

Attachment 1 - Stormwater Management Program Update

Introduction

The National Pollutant Discharge Elimination System (NPDES) Permit Program is a requirement of the Federal Clean Water Act intended to protect and restore waters for “fishable and swimmable” uses. The Federal Environmental Protection Agency delegated permitting authority to state environmental agencies. In Washington, the NPDES-delegated authority is the Washington State Department of Ecology (Ecology). Since the City of Federal Way (City) operates a small municipal separate storm sewer system (MS4) that serves less than 100,000 people, it is designated as a “Phase II” community and must comply with Ecology’s Western Washington Phase II NPDES Municipal Stormwater Permit (Permit). The first Permit was issued to the City in 2007 and the current Permit was re-issued in 2012. A new Permit was to be issued July 2018, however, Ecology extended the terms of the current Permit and it will continue to stay in effect through July 2019.

The Permit allows municipalities to discharge stormwater runoff from the MS4 into the State’s water bodies (e.g., streams, rivers, lakes, wetlands, Puget Sound, etc.) as long as municipalities implement measures to protect water quality to the “maximum extent practicable” through the application of best management practices. These required practices, specified in the Permit, are implemented through the City’s Stormwater Management Plan (SWMP). Permit section S5.2.A requires that the City detail “activities for the upcoming calendar year” in order to meet Permit requirements. These activities are documented within the SWMP and organized according to the following program components as outlined in the Permit:

- Public Education and Outreach (S5.C.1)
- Public Involvement and Participation (S5.C.2)
- Illicit Discharge Detection and Elimination (S5.C.3)
- Control of Runoff from New Development, Redevelopment, and Construction Sites (S5.C.4)
- Pollution Prevention and Municipal Operations and Maintenance (S5.C.5)
- Monitoring (S8)

The goal of the SWMP is to apply all known and reasonable technologies (AKART) to reduce the discharge of pollutants into area receiving waters, protect surface waters from water quality degradation, and conserve aquatic ecosystems.

Public Education and Outreach

The Surface Water Management Division (SWM) provides ongoing public education and outreach designed to reduce and eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. Staff utilizes a variety of approaches to inform targeted audiences about stormwater issues and provides specific actions people can follow to minimize stormwater pollution.

S5.C.1.a.i and ii Targeted Stormwater Outreach

A summary of educational activities scheduled for 2019 is provided as follows:

- Continue to make improvements to the Storming the Sound with Salmon (SSS) Program. In 2016, SWM determined the culminating release event was not providing a learning opportunity for high school aged students. In 2016, 2017, and 2018, SWM worked with the Federal Way Public Schools to implement various options for the final phase of the SSS program at the high school level. Evaluation of these options provided insight and direction for planning a more relevant experience for high school students in the 2018/2019 school year. In 2019, SWM will work on developing a meaningful, age-appropriate experience for high school students that will include a capstone project within environmental sciences courses. This will help connect students to career opportunities in the environmental field and involve them in an authentic research experience. The capstone project will include water quality sampling, monitoring, and testing in a waterway local to their school and proposing an action project based on the data collected.
- Continue to sponsor the salmon release event in the spring for the SSS program and make meaningful changes to the program's implementation. Each year, students participate in a daylong field trip to release their Salmon into the West Hylebos Creek and participate in water and ecological related presentations and activities led by staff and several volunteer environmental organizations. Past events spanned four days and were open to classes in grades K-6. This year the event will span five days, and will become a grade level experience for all fourth graders.
- Develop an Interlocal Agreement (ILA) with the City of Federal Way Public Schools to standardize SSS implementation for all schools that participate. The ILA will also provide clearly defined areas of responsibility for the City and for the School District and provide a framework for program sustainability.
- Continue to partner with the Environmental Coalition of South Seattle (ECOSS) to provide stormwater education and free spill kits to businesses in the automotive and restaurant industries. ECOSS provides stormwater inspection support, customized spill plans, and spill response training for managers and employees. In previous years, ECOSS was funded by a regional grant to provide this outreach effort to twenty area businesses, particularly to businesses that had multi-lingual employees. Although grant funding is no longer available, SWM intends to continue this program, targeting outreach to businesses with activities that are prone to spills, such as restaurants and automotive support services.
- Continue to produce newsletters and other publications that address a variety of topics on pollution prevention and general awareness of stormwater related issues. In August 2018, SWM switched to a shared monthly e-newsletter with the City's Solid Waste Division. This has enabled

SWM to reach a wider audience, and to provide more time-sensitive information related to upcoming events and Permit-related issues.

- Continue to sponsor stormwater and environmental related workshops. Since 2017 the City has partnered with a locally-owned fresh food marketplace to host the City's Green Living Workshop Program in an effort to increase awareness of this program. Due to the substantive increase in participation, SWM will continue to partner with Solid Waste to sponsor free classes to the public on topics such as green cleaning, natural lawn care, water conservation, rain gardens, and the use of rain barrels.
- As a result of local organizations increasing their use of charity car wash ticket programs run through the Pacific Northwest Car Wash Association and Brown Bear Car Wash, the City reduced the number of fish friendly car wash kits available to the public in 2018. These kits are designed to divert wash water to the sanitary sewer system and are loaned out by the City for charity car washes at no cost. Due to more organizations using external charity car wash ticket programs, only 6 kits were checked out in 2018—less than in previous years. In 2019, SWM will continue to encourage the use of charity car wash ticket programs and will reduce the number of car wash kits available for check out to two.
- Continue to provide educational markers for installation near catch basins that drain to the MS4. The markers inform the public that the drains discharge to local waterways.
- Continue to run the Scoop the Poop Campaign. In 2018, the City focused on audience and behavior research, identification of motivators and barriers to picking up pet waste, and the adoption of specific strategies to address the identified motivators/barriers using focus groups, door-to-door surveys, and a pre-survey mailer to the targeted area, tabling at community events, and a "Scoop the Poop Pledge." In 2019, staff will focus on outreach to enlist the help of local pet-related businesses to disseminate the message. Outreach will also include a press release, social media posts, and a pet waste specific page on the Surface Water website. Water quality staff will also conduct monthly fecal testing within the watershed to determine trends in water quality data.
- Continue to partner with Solid Waste staff to initiate Social Media Marketing efforts in 2019, which consists of a Public Works Facebook page and a monthly Constant Contact e-newsletter. SWM will use the page to reach a broader segment of the City's residents, and to advertise events, promote programs, and post related news and events from other sources to increase awareness of stormwater issues.
- In 2018, SWM staff planned to begin transcreating the most frequently used education and outreach materials, as well as BMP fact sheets most frequently used for water quality correction notices for area businesses. Staff worked with volunteers to adapt the general SWM informational brochure into Korean, and procured large restaurant BMP posters in Spanish. In 2019, staff will continue to expand the number of education and outreach materials offered in languages besides English. SWM participated in a regional outreach campaign which created a set of three PSA's focused on pet waste pickup, fixing car leaks, and natural yard care. The ads aired in English on multiple networks throughout the Puget Sound region, including Federal



Way, and copies of the ads were made available to municipalities in English, Spanish, Korean, and Vietnamese. In 2019, copies of the ads in all languages will be posted on the City's YouTube page, shared through social media, including Constant Contact and Facebook, and the Korean language ads will be shared at a Korean quarterly meeting.

S5.C.1.b Creating Stewardship Opportunities

- In 2018, SWM staff researched best practices and methodologies for building a Stream Team or Stream Stewards Program. In 2019, SWM Staff will develop a plan for re-implementation of a Stream Team program and research the viability of an Adopt-a-Drain program.
- Continue to host volunteer events that encourage public participation in stewardship activities. Activities may include storm drain marking, removing invasive plants species, planting native vegetation, and removing garbage and debris from local waterbodies.

S5.C.1.c Measuring Outreach Effectiveness

- In 2019, SWM will continue to support the regional efforts of the Don't Drip and Drive campaign by promoting the campaign on social media, recruiting automotive businesses to participate, and serving on the Don't Drip and Drive Steering Committee.

Public Involvement & Participation

The City encourages the public and interested parties to participate in the decision-making process involving the development and implementation of NPDES Permit related activities and programs.

S5.C.2.a and S5.C.2.b Involving the Public in the SWMP

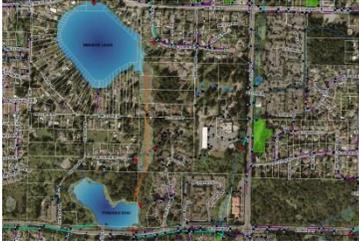
Opportunities for public participation in the development of the SWMP include the following:

- January 16, 2019: Public Input Meeting on the City's Storm Water Management Program (SWMP) Plan and SWM Comprehensive Plan Update;
- March 4, 2019: Land Use and Transportation Committee meeting;
- March 19, 2019: City Council meeting. The Council reviews the programmatic and policy changes proposed under the SWMP and allows public comment on all agenda items.
- The City's Surface Water Management webpage displays the updated SWMP and the Annual Report. Opportunity for public comment and participation is made possible via e-mail year round.

Illicit Discharge Detection & Elimination

Federal Way maintains a robust Illicit Discharge Detection & Elimination (IDDE) Program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.

55.C.3.a Municipal Stormwater Drainage System Map



In 2018, SWM performed routine updates to the MS4 mapping and also concentrated on an update to the identification and mapping of the City's outfalls within the MS4. In 2019, SWM Staff will continue routine updates that result from: the City's Video Inspection Program, completed new development or redevelopment as-builts, and field verifications from utility locates. Additionally, SWM Staff will evaluate sub-watershed basin boundaries for possible adjustment and mapping updates.

55.C.3.b Water Pollution Prevention Ordinance

City Ordinance 09-619 prohibits non-stormwater discharges into the City's MS4. Examples of illicit discharges include trash, food wastes, construction materials, petroleum products, paint, pesticides, fertilizers, soap, and wash water. The SWM Water Quality Section implements escalating enforcement procedures and actions pursuant to those outlined in Chapter 1.15 Federal Way Revised Code (FWRC). In 2018, enforcement procedures were reviewed and updated to achieve more efficient compliance and legally enforce monetary penalties for those violators that continually fail to comply. In 2019, SWM staff will incorporate the updated IDDE Field Procedures and Response Plan into its ongoing IDDE program.

55.C.3.c Ongoing IDDE Program to Detect Non-stormwater Discharges and Illicit Connections & 55.C.3.d Implement an Ongoing Program Designed to Address Illicit Discharges

The City met the Permit requirement for screening 40 percent of the City's stormwater system for illicit connections through recurring source control inspections, video inspections, and stormwater facility inspections. This program is ongoing, and in 2019 SWM staff will:

- Continue to inspect private commercial stormwater systems that discharge into the City's MS4 to ensure maintenance complies with standards outlined in the Permit. SWM Staff incorporates an education and outreach program into the commercial site inspection program. This component provides advance notice and site specific information of stormwater systems to property owners and their representatives. In addition, the outreach program provides information on BMPs targeted to each site's commercial activities and land use. In 2019, SWM staff will be placing a special emphasis on source control best practices. Staff will work to incorporate more feedback mechanisms from property owners and managers to ensure outreach methods and materials are accessible and effective, and will use the collected data to update outreach efforts for commercial sites.
- Analyze data collected during the 2013-18 Commercial Site Inspection program to prioritize sites for future inspection. The data includes land use, compliance history, and pollution risks associated with each site.
- Continue to utilize the IDDE database created in 2017 for staff use. The database increases

efficiencies in reporting and recording spills and respective response actions. The database was created in 2017 and was updated in 2018 to allow for geographic and trend assessments. A spill analysis of the 2013-18 Permit cycle was conducted to evaluate hot spots in the City for illicit discharges, further broken down by type of discharge, drainage basin, and year. The results of this analysis will be used in 2019 to assist staff in identifying seasonal and/or geographic trends in repeated water quality violations. SWM Staff will utilize this analysis to target outreach and technical assistance in an effort to reduce common illicit discharges.

- Utilize the updated IDDE Field Procedures and Response Plan for all incoming employees to provide an introduction to the program and orient them with City procedures for investigating, identifying, enforcing, and eliminating illicit discharges and illicit connections.

55.C.3.e IDDE Staff Training

SWM staff will continue to provide annual training to all City of Federal Way field staff and police personnel in the identification of illicit discharges and notification to appropriate authorities. Additionally, all maintenance personnel, SWM Water Quality staff, and SWM Inspectors are trained annually in spill response and first responder hazard awareness. SWM staff will continue to review field procedures for identifying, tracing, reporting, and documenting all reported illicit discharges.

55.C.3.e Program Recordkeeping

In addition to the IDDE database created in 2017, SWM staff utilize a public works maintenance management software system, VUEWorks, to track and record all reported water quality violations and associated documents, including: photographs, site maps, correspondence, legal actions, and final resolution. Commercial site inspections are tracked through a Microsoft Excel spreadsheet and active construction sites are tracked through the City's permitting system. In 2019, Public Works Inspectors will initiate tracking of interim TESC inspections of active construction sites within VUEWorks.

Controlling Runoff from Construction Sites



Construction site run-off is a major contributor to water quality degradation in the greater Puget Sound region. To address this issue, the City adopted the current King County Stormwater Design Manual and the City of Federal Way Addendum in 2016. Changes were made to development-related standards in 2016 to make Low Impact Development (LID) the preferred and commonly used approach in site development.

55.C.4.a Apply Stormwater Management Standards to Development, Redevelopment, and Construction Sites

Federal Way Public Works Development Standards, codified under FWRC 19.135.130, and the King County Stormwater Design Manual, as amended and adopted under City Ordinance 16-828, includes minimum requirements for stormwater design and construction for the protection of water quality and the reduction of pollutant discharge.

S5.C.4.b Review and Inspect Development/Redevelopment Projects

In 2019, Public Works Development Services will continue to implement the City's permitting process including civil/site plan review and approval for compliance with City of Federal Way standards. Public projects in the right-of-way that trigger local permits will be reviewed by internal stormwater engineers. During construction, Public Works staff will continue to conduct weekly site inspections to ensure implementation of proper temporary erosion and sediment control (TESC) BMPs. City inspectors have the authority to enforce TESC standards for both private and public projects in order to reduce pollutants in stormwater runoff to the MS4 from new development, redevelopment, and construction site activities.

In 2019, the City will be updating the Development Standards, which will include a review of planned LID criteria. This review is part of the City's effort to require LID principles and LID BMPs to make it the preferred and commonly used approach to site development.

S5.C.4.c Post Construction Operation and Maintenance

The City has an ongoing program to verify that long-term operation and maintenance (O&M) of post construction stormwater facilities and BMPs is implemented. The City requirements for maintenance standards are identified under the 2016 King County Stormwater Design Manual Appendix A, *Maintenance Requirements for Flow Control, Conveyance, and Water Quality Facilities*. In 2019, Public Works staff will continue post construction inspections prior to release of warranty bonds. In addition, SWM staff will review post construction inspection procedures in conjunction with the Development Standards update.

S5.C.4.d Notice of Intent (NOI)

The City includes notification of the requirement to meet NOI in the pre-application comments, during the review for land use, and during plan review for building permit phases depending on the project. The development services project manager makes periodic inquiries to the on-line permit to verify compliance.

S5.C.4.e Staff Training

Plan reviewers are managed by a professional licensed engineer and all City staff responsible for approval and/or inspection of new development, redevelopment, or construction are certified in Construction Erosion and Sediment Control Lead (CESCL). City inspectors are also sent through the Washington Department of Transportation Local Technical Assistance Program (LTAP) for construction inspection and documentation training.

S5.C.4.f Low Impact Development Code-related Requirements

In 2016, the City completed this requirement to review and where necessary revise enforceable documents to make LID the preferred and commonly used approach to development. The City continues to utilize Public Works Development Standards, which function as the City's enforceable document related to local development, and was updated in 2016 and again in 2017. In 2019, the Public Works Development Standards will be updated and SWM staff will review and propose any necessary revisions for continued permit compliance.

S5.C.4.g Watershed-scale Stormwater Planning

Not applicable. The City of Federal Way does not have coverage area in a watershed selected by a Phase I county for watershed-scale stormwater planning under condition S5.C.5.c of the *Phase I Municipal Stormwater Permit*.

Pollution Prevention, Operations & Maintenance

SWM has an ongoing program to reduce stormwater impacts associated with maintenance and operations of City streets, facilities, and properties. The program applies to drainage infrastructure, which includes catch basins, pipes, open channels, as well as residential and regional retention/detention facilities.



5.C.5.a Maintenance Standards

- In 2019, SWM maintenance personnel will continue to implement maintenance standards as outlined in the amended and adopted 2016 King County Stormwater Design Manual, which includes Appendix A: *Maintenance Requirements for Flow Control, Conveyance, and Water Quality Facilities*.

55.C.5.b Annual Inspection of Flow Control and Runoff Treatment Facilities

- Continue to inspect known municipally owned and operated stormwater treatment and flow control facilities as required by the Permit. Control structures, retention/detention ponds, and bioswales are inspected and maintained annually. Any repairs required are recorded and scheduled in the City's maintenance management and tracking system, VUEWorks.
- In 2018, SWM implemented mobile technology into its inspection program which allows for electronic recording, filing, and scheduling for inspection results. In 2019, SWM will implement the second phase of this program which will provide real time recording into the City's maintenance management and tracking program software. This will result in streamlined operations. Also in 2019, this inspection program will be expanded to include outfalls and control structures.
- SWM Inspectors will continue to use the Video Inspection Program (Program) as a tool to proactively manage the stormwater system to prevent flooding, drainage problems, and other water quality concerns. The Program also supports several NPDES-related activities including ongoing comprehensive mapping of the system, evaluation of management practices, and the improvement of the ability to trace spills and identify illicit connections to the MS4.

55.C.5.c Major Storm Event Inspections

- SWM Staff will continue to inspect facilities vulnerable to surface water related problems during and after major storm events to ensure the systems are functioning properly, and to determine/conduct any maintenance or repair needs.

55.C.5.d Catch Basin Inspection Program & 55.C.5.e Compliance with Inspection requirements

- SWM will continue to inspect and clean (when necessary) catch basins owned by the City. In 2018, SWM incorporated an annual assessment into the City's catch basin inspection program. In 2019, SWM will continue to review the City's circuit schedules, actual inspection results, cleaning and

maintenance records, new development or redevelopment schedules, changes in commercial use, and evaluation of previous year's snow and ice operations. SWM will use this assessment to adjust the City's circuits in order to comply with the requirements of an alternate inspection schedule under the next permit cycle.

- To assist with this effort, SWM has implemented a new inspection program using mobile technology that provides more accurate measuring and tracking of catch basin sediment levels. The technology also provides better record keeping, ensuring that maintenance is performed on those catch basins meeting or exceeding the threshold within the six-month permit-required timeline.
- SWM will continue to inspect and clean all arterial catch basins within the City.

S5.C.5.f Practices, Policies, and Procedures to Reduce Impacts of Stormwater Runoff Related to Municipal Operations

- In 2018, SWM Staff implemented new procedures and practices for managing the stormwater infrastructure maintenance program. Included in the updated program were changes in scheduling, tracking, and recording of maintenance activities. In 2019 SWM will review the 2018 program and update the current maintenance Standard Operating Procedures (SOPs) to incorporate changes made to the program.
- Also in 2019, SWM will review Streets and Parks O&M SOPs for adherence to permit requirements for reduction of stormwater impacts associated with maintenance activities.

S5.C.5.g Training Program for Operation and Maintenance Personnel

- City field staff is trained annually in IDDE and spill response procedures. In 2019, field staff responsible for construction operations, street maintenance, parks, and facilities maintenance will also receive updated training in construction BMPs, spill response, and review of Stormwater Pollution Prevention Plan (SWPPP) and TESC requirements.
- Maintenance personnel are trained on a rotational basis for pesticide/herbicide application and this program will continue in 2019.

S5.C.5.h Implement a Stormwater Pollution Prevention Plan for Heavy Equipment, Maintenance, and Storage Yards

- In 2019, the City will review and update the SWPPP for the Public Works/Parks Maintenance Yard Annex located at 31130 28th Avenue South. In addition, a generic SWPPP for all City-owned sites that have above-ground storage tanks will be developed and disseminated to responsible staff.
- Staff will continue to review policies and procedures to ensure proper pollution management practices are consistently being implemented and documented.

S5.C.5.i Operation, Maintenance, and Repair Records

- In 2018, a review of records retention and data collection was done as part of the updated procedures and practices for operation, maintenance, and repair. In 2019, SWM will be completing

the implementation plan for digitizing all O&M and repair records as well as standardizing maintenance records procedures.

- Also in 2019, SWM will review recording and tracking procedures for Streets and Parks personnel.

Monitoring

A collaborative monitoring program is paid for by Western Washington NPDES Permittees, administered by Ecology, and designed to monitor and evaluate the effectiveness of the best management practices specified in the Permit. The goal of the monitoring program is to provide an unbiased assessment of whether stormwater management actions are resulting in genuine progress towards regional water quality targets. In 2019, the City will continue to pay into the collective fund and support the implementation of the three components of the Regional Stormwater Monitoring Program:

- In-stream monitoring to measure whether the health of lowland streams and shorelines in Puget Sound is improving or declining;
- Stormwater effectiveness studies to provide widely applicable information about what best management practices work, or don't work, and how to improve stormwater management; and
- Source Identification Information Repository designed to share information about source identification and elimination methods and identify opportunities for regional solutions to common illicit discharges and pollution problems.

Conclusion

The Annual Report and SWMP update is posted on the City of Federal Way website at:

<http://www.cityoffederalway.com/sites/default/files/Documents/Department/PW/Surface%20Water/com%20bined%20files.pdf>.

If at any time the City is unable to comply with the terms and conditions of the Permit, staff must notify Ecology within 30 days of becoming aware that non-compliance has occurred. Written notification must include a description of the non-compliance issue and steps planned or taken to achieve compliance. The City remains in compliance with the Permit and is using all known, available, and reasonable methods of prevention, control, and treatment to prevent pollution into the surface waters of Washington State.

Attachment 2 - Description of 2018 Public Education Activities

Public Events

In 2018, the Surface Water Management Division continued to create a more public presence. To this end, City staff tabled at three community events over the summer, including three Federal Way Farmers Markets, Federal Way Kid's Day, and one of the City's "Movie in the Park" nights.

Storming the Sound with Salmon Program

The Storming the Sound with Salmon program is an annual stormwater education program developed and implemented by the City and the Federal Way Public Schools in 2012. The program includes classroom curriculum focusing on stormwater education and provides students with the opportunity to raise salmon at their school. At the end of the school year, students participate in a salmon release event where they release the salmon into a local creek and spend the day participating in outdoor learning at a local park. In May, the City held four salmon release events serving over 900 students from 35 different schools.

Natural Yard Care Classes

The City collaborated with Tilth Alliance to host a series of three Natural Yard Care classes in 2018. The topics included "Fall Lawn Care," "Do More with Your Yard," and "Hands-On: Lawn Care, Soil Building and Planting," and were taught by experts from Tilth Alliance and the Garden Hotline. A total of 22 people attended the three workshops.

Waterworks Grant

The Waterworks Grant, awarded to the City on April 13, 2016 by the King County Natural Resources and Parks Waste Water Treatment Division, provided the City funding to create a video on the Storming the Sound with Salmon Program, which was completed in January 2018. The video will be used as a tool for other jurisdictions who may be thinking about starting their own similar program. Filming began in December 2017, with video completion in January 2018.

Green Living Workshops

The Surface Water Management Division and the Solid Waste & Recycling Division staff collaborate to provide free educational workshops for residents on topics related to stormwater and sustainability. Topics in 2018 included: Edible Gardening, Green Cleaning, Worms Bins & Backyard Composting, Marine Debris, Natural Landscaping, Noxious Weeds, Zero Waste, and Fruit Tree Pruning.

Volunteer Events

The Surface Water Management Division recognizes and appreciates the hard work of volunteers that donate their time to improve the water quality of stormwater and our local surface waters. The City held five volunteer events in 2018 totaling 392 volunteer hours, and hosted one recurring volunteer who totaled nine hours. Volunteer activities included removing invasive plants, cleaning up local parks and streams, and assisting with Storming the Sound with Salmon.

E-Newsletter

In 2018, public education staff transitioned from a print quarterly newsletter to monthly e-newsletters in collaboration with the Solid Waste Division. E-newsletters allowed the division to

provide more timely information to the public on seasonal stormwater issues and upcoming events.

Environmental Coalition of South Seattle (ECOSS)

The City collaborated with ECOSS, a non-profit organization, which provided multilingual stormwater outreach to 45 businesses in the City. ECOSS provided free spill kits, custom spill plans and training so businesses knew how to quickly deal with spills and illicit discharges.

Car Wash Program

The City's car wash program informs businesses and charity groups that it is a violation of City Code to allow dirty soapy water from car washing to enter storm drains. Realizing that car washes are an important fundraising tool for many groups in the community, the City offers an environmentally safe solution. The City has special kits available that pump wash water into the sanitary sewer system, keeping contaminants out of local surface waters. During 2018, five charity organizations checked out the kits six times, at no charge, from the Public Works Department. The City also advertises charity car wash ticket programs through the Puget Sound Car Wash Association (PSCWA) and Brown Bear as alternatives to the car wash kits. In 2018, local organizations bought 597 car wash tickets through PSCWA and 4,492 through Brown Bear.

Various Publications

Each year, the Surface Water Management Division produces new and updated public education materials as needed. In 2018, some of the materials created included translating the general Surface Water Management brochure into Korean, and updating the Scoop the Poop brochure to make it more easily translated in the future.

Puget Sound Starts Here Commercial Series

The Surface Water Management Division participated in a regional outreach effort coordinated by Stormwater Outreach for Regional Municipalities (STORM), which involved a series of three commercials that aired on all Comcast platforms from June to September. Each commercial was a call to action that focused on a different BMP: natural yard care, pet waste, and fixing car leaks.

Pet Waste Survey

As part of the Scoop the Poop Program the Surface Water Management Division conducted a survey of residents within the Upper Joe's Creek Watershed to gauge knowledge of pet waste issues. The City mailed the survey to 1,330 residents, and received 133 responses. The responses will be analyzed in 2019 and used to determine outreach strategies going forward.

Training

City staff participated in a number of trainings in 2018 related to the City's Stormwater Management program. Trainings varied in the number of staff in attendance.

Internal Training:

NPDES Presentation to Land Use and Transportation Committee & City Council
IDDE Training for Fire Department
IDDE Training for Police Department
IDDE Response Training for Field Staff

Amanda Database Program
VUEWorks Database program
Website Training

External Training:

Regional Education and Outreach Annual Symposium
CESCL Training for Inspectors
King County Stormwater Design Manual Training
Certified Stormwater Inspector Training
Trenching and Shoring Certification
Confined Space Certification
Pipe Assessment Certification
Manhole Assessment Certification
Lateral Assessment Certification
Automated Sustainable Stormwater Design with XPDRAINAGE Webinar
Asset Management as a Process Workshop
Planning for Infrastructure Replacement Workshop

Attachment 3 - Evaluation & Measurement of a Selected Education Program

Summary

The City of Federal Way has been partnering with ECOSS (Environmental Coalition of South Seattle) to provide multicultural outreach on spill kits to businesses in Federal Way since 2013. In 2018, ECOSS engaged with 45 multicultural and English-speaking businesses on behalf of Federal Way to teach them about stormwater pollution prevention, help them save money by providing spill kits at no cost, and promote the protection of Puget Sound.

The Surface Water Management Division chose 54 businesses to work with, based on the most active violators. Of these 54 businesses, 8 had gone out of business, 20 received spill kits, 26 participated in post-service surveys, and one declined service. ECOSS staff provided outreach materials in multiple languages, including Spanish, Vietnamese, Korean, Somali, Mandarin/Cantonese, and other languages as needed.

ECOSS worked with a social marketing consultant to determine the perceived barriers and benefits of these businesses that would either prevent or motivate them to participate in the program. With their barriers and benefits research, they provided a number of outreach materials to the businesses:

- Program Brochure
- Instruction Poster
- Spill Kit Content Sheet
- Pledge Sheet
- Spill Plan
- Site Map

ECOSS conducted initial and follow-up visits to all businesses. During initial visits, staff conducted a baseline survey of owners or staff to get a sense of levels of knowledge of stormwater issues and beliefs about the responsibility of the business to clean up their own spills. A representative sample of the businesses was then contacted to complete a post-survey. When two or more years have passed since an initial visit to a business, ECOSS treats the business as a new site visit and provides all of the same resources as they do for an initial visit.

Data**Types of Businesses Visited:**

- 48% Food Service
- 22% Automotive
- 15% Grocery Mart
- 8% Gas Station
- 7% Washing

Languages Spoken:

- 27% Spanish
- 27% Korean
- 7% Hindi
- 7% Mandarin
- 6% Punjabi
- 6% English
- 6% Cantonese
- 4% Arabic
- 4% Japanese
- 4% Thai
- 2% Vietnamese
- 2% Japanese
- 2% Russian

Outcomes for 2018:

- 45 businesses received spill training, a spill kit, spill plan, and site map.

Recommendations and Next Steps:

- Continue providing the program in 2019 in order to solidify knowledge of spill prevention and clean-up within the business community and build long-term relationships.
- Revisit businesses to provide updated training as needed.
- Allocate more staff time to the program.

City staff is working on compiling data on spill kit outreach in the City from 2013-18 in order to determine trends among the businesses reached and assess next steps.

VUEWorks #	IDDE Discovery	Property Name	Physical Address	Discovery Date	Completed Date	Parcel #	ERTS #	Current Status	Type of IDDE
S-0118-0064	ERTS	Puget Sound Energy Oil Spill	30240 8th Ave. S.	17-Jan-18	24-Jan-18	5152600050	678556	ERTS report received regarding small spill of transformer fluid in residential cul-de-sac. Internal staff investigated and deployed absorbent materials to eliminate discharges in roadway. Vactor truck arrived onsite shortly after to clean out impacted catch basins. No impact to nearby surface waters. Violation letter sent to Puget Sound Energy; no further action required.	Spill
S-0118-0102	WM	Pickup Trucks with Debris	2409 SW 344th Pl.	16-Jan-18	19-Jan-18	8947200020	N/A	Staff received a call from Waste Management regarding a broken down pickup with open oil containers in the bed of the truck that could be leaking. Staff investigated the site and noted pickups full of trash and debris. No discharges or sheens observed in the roadway. No further action needed.	Poor BMPs
S-0118-0103	Hotline	Insituform Water Tank Dumping	8th Ave. S. & S. 298th St.	24-Jan-18	29-Jan-18	ROW	N/A	Permit counter received call about potential illegal dumping in residential storm drain. Water quality staff investigated further and did not observe any evidence of illicit discharges. Further investigation unearthed that the discharge was from a potable water tank owned by Insituform. Allowable discharge. No further action needed.	Dumping
S-0118-0110	Hotline	Drip Pan Oil Spill	824 S. 309th St.	26-Jan-18	29-Jan-18	9315000080	N/A	Oil spill reported in residential area. Staff investigated site and observed oil spill on the roadway from a drip pan under a parked pickup truck. Absorbent materials were used to contain the spill and were later disposed of. Follow-up investigation showed no oil sheen nor discharge to stormwater system. No further action needed.	Spill
S-0218-0011	Internal PW	Oil Spill - Street Sweeper	356th and Pacific Hwy S.	02-Feb-18	02-Feb-18	ROW	N/A	Internal notification about possible oil spill in gutter area off 356th St. and Pacific Hwy. Maintenance staff investigated, utilized absorbent materials to eliminate the discharge, and found no discharge to stormwater system. No further action needed.	Spill
S-0218-0013	Hotline	Sewage in Yard	2667 SW 332nd St	02-Feb-18	05-Feb-18	894430074001	N/A	Hotline call received from someone suspecting neighbor of pumping sewer wastewater into nearby storm drain. Staff investigated the site and found two workers repairing broken sewer line beneath house. No sewer discharges to storm system, and instructed workers on appropriate BMPs. Called landlord and said this is a landlord/tenant issue to fix broken sewer line. Confirmed that he would fix it. No further action needed.	Dumping
S-0218-0028	Internal SWM	E&E Foods/Salmolux Inc.	34100 9th Ave. S.	07-Feb-18	16-May-18	1321800020	N/A	Internal staff reported unsanitary conditions involving fish wastes around the site at E&E Foods/Salmolux Inc. fish processing plants. Discharges were eliminated and plants ceased operations in May 2018. No further action needed.	Poor BMPs
S-0218-0029	Lakehaven	Denny's	2132 S. 320th St.	06-Feb-18	14-May-18	2423200040	N/A	Lakehaven notified city staff about a clogged grease interceptor causing discharges in the parking lot at Denny's. Staff investigated and met contractor onsite that was cleaning all grease traps. Violation letter sent and property manager emailed documentation that blockage was identified and cleared. No further action required.	Poor BMPs
S-0218-0033	Internal SWM	Black Angus	2400 S. 320th St.	07-Feb-18	06-Apr-18	0921049276	N/A	Grease discharges from poorly kept dumpster area at Black Angus. Violation letter sent and property management replaced grease tote and cleaned up surrounding discharges. No further action required.	Poor BMPs
S-0218-0035	Internal SWM	Puerto Vallarta	2002 SW Campus Dr.	07-Feb-18	09-Mar-18	1321039108	N/A	Grease dumped into storm drain at north end of parcel by restaurant staff. Violation letter sent and storm drain was vactored by property management. No further action needed.	Dumping
S-0218-0039	Internal SWM	R90304 - sediment in CB	2028 SW 306th Pl	07-Feb-18	21-Feb-18	ROW	N/A	Internal notification about turbidity/erosion control issue on residential plat. Located storm drains heavily impacted with sediment that were purposefully filled in and no longer in use. Sediment washed downstream into open conveyance along ROW. Maintenance crew cleared impacted conveyances. No further action needed.	Poor BMPs
S-0218-0041	Code Enforcement	Mirak Oriental Restaurant	31260 Pacific Hwy S	08-Feb-18	16-Feb-18	0921049265	N/A	Internal code enforcement staff notified water quality staff that a local restaurant was allegedly washing chicken over a storm drain. Staff investigated and did not observe any contaminants in the storm drain nor evidence of washing activities around the storm drain. Sent restaurant a technical assistance letter. No further action needed.	Dumping
S-0218-0048	Hotline	Mud - Oil ERTS	27916 21st Ave S	12-Feb-18	23-Feb-18	7575620640	679212	ERTS report received regarding mud and oil all over ROW coming from residential construction site. Staff investigated and found sediment track-out but no oil discharges. Violation letter sent to property owner. Site stabilized and discharges eliminated. No further action needed.	Poor BMPs

S-1217-0035	Hotline	ProTouch	31414 Pacific Hwy S	07-Dec-17	16-Feb-18	0921049286	N/A	Anonymous complaint about hose discharging brown water at local auto detailing shop. Staff investigated and did not observe any hoses except those in car washing area that drain directly to sanitary sewer. No further action needed.	Poor BMPs
S-0218-0086	Internal SWM	Monster Burgers	1703 S 324th St	20-Feb-18	12-Mar-18	2501200110	N/A	Internal notification about grease and wash water being discharged from back door of restaurant. Staff investigated, confirmed discharges, and sent violation letter. Impacted storm drains were vacated and discharges eliminated. No further action needed.	Dumping
S-0218-0066	Internal PW	320th and 1st	32015 1st Ave S (in front of)	16-Feb-18	23-Feb-18	ROW	N/A	Internal staff observed small amount of oil on roadway. Maintenance crew deployed absorbent materials and catch basin socks to eliminate the discharge and prevent stormwater system impacts. No further action needed.	Spill
S-0318-0011	Code Enforcement	Haz Waste Buckets by Vacant Albertson's	33620 21st Ave SW	02-Mar-18	01-May-18	2421039001	N/A	Internal staff observed several buckets of hazardous waste material at a commercial property parking lot area. The buckets were secure and not actively leaking. Property owner was contacted and his staff removed the buckets.	Dumping
S-0318-0053	Internal SWM	Old Country Buffet	1816 S 320th St	14-Mar-18	30-Mar-18	0921049208	N/A	Internal staff observed cooking grease discharges over roadway and in nearby catch basin resulting from a recent washing of the grease tote. Violation letter sent and follow-up inspection confirmed elimination of all discharges.	Poor BMPs
S-0318-0071	Internal SWM	Evergreen Plaza	2200 S 320th St	20-Mar-18	30-Mar-18	2423200050	N/A	Internal staff noted heavy cooking grease discharges in storm drain near restaurant in large strip mall. Violation letter sent to property owner and follow-up inspection confirmed that all discharges were eliminated. Sent BMP resources to all food establishments in strip mall.	Dumping
S-0318-0103	Internal SWM	Little Caesar's	2500 SW 336th St	29-Mar-18	19-Apr-18	1321039096	N/A	While conducting annual commercial site inspection, internal staff noted wash water discharging from back door of restaurant to nearby catch basin, also impacted with garbage. Violation letter sent and follow-up inspection confirmed discharges were eliminated.	Poor BMPs
S-0418-0015	Internal SWM	Safeway	2109 SW 336th St	02-Apr-18	01-Jun-18	8732170020	N/A	Internal staff noted rust discharges from the trash compactor that impacted two catch basins onsite. Violation letter sent and follow-up inspection confirmed corrective actions were completed and discharges eliminated.	Poor BMPs
S-0418-0016	Internal SWM	Fred Meyer	33702 21st Ave SW	02-Apr-18	13-Jun-18	9301000010	N/A	Internal staff observed grease tote and trash compactor discharges during annual inspection. Violation letter sent and follow-up inspection confirmed no further discharges onsite. Store manager told staff he implemented a new employee training on grease disposal to prevent further discharges.	Poor BMPs
S-0418-0022	Internal SWM	AutoZone	33510 21st Ave SW	04-Apr-18	05-Apr-18	1321039100	N/A	During annual inspection, staff noted large quantity of garbage and open oil containers in the dumpster area of AutoZone and had staff clean up a large oil sheen in front of the enclosure. Violation letter sent and follow-up inspection confirmed corrective measures have been implemented.	Poor BMPs
S-0418-0027	Internal SWM	Goldmaur SF Building Site	32527 44th Ave S	04-Apr-18	05-Apr-18	2824100620	N/A	Internal erosion control inspection found turbid discharges from Goldmaur development site. Construction crew immediately began pumping turbid water from worksite and eliminated the trenches causing the discharges. Follow-up inspection the day after confirmed no further turbid discharges. Violation letter with technical assistance sent to contractor. No further action needed.	Poor BMPs
S-0418-0028	Internal SWM	Pavilions Centre	31513 Pacific Hwy S	06-Apr-18	29-May-18	0821049181	N/A	During annual inspection, staff noted poorly kept grease totes resulting in grease discharges washing down the loading bay and into the storm system. Violation letter sent and follow-up inspection confirmed that discharges were eliminated and BMPs implemented for improved housekeeping with regards to grease disposal.	Poor BMPs
S-0418-0032	Hotline	Rico's Tires	29314 Pacific Hwy S	10-Apr-18	13-Apr-18	3040200070	N/A	Hotline call received about oil and grease discharges all over parking lot. Internal staff investigated, confirmed discharges, and spoke with manager about cleaning up the discharges. Violation letter sent and follow-up inspection confirmed all prior discharges were eliminated.	Poor BMPs
S-0418-0043	Hotline	Eagle Tire	1515 S 344th St	13-Apr-18	13-Apr-18	8897000030	N/A	Hotline call received about an oil spill in parking lot of Eagle Tire. Internal staff investigated and found that spill originated from the ROW, not the business. No impact to MS4 observed, and staff placed absorbent booms to clean up discharges. No further action needed.	Spill

S-0418-0044	Hotline	Carpet Cleaner	28620 14th Ave S	13-Apr-18	13-Jun-18	7203000410	N/A	Hotline call received from individual claiming that neighbor owns a carpet shampoo business and dumps wash water in a nearby open conveyance. Internal staff investigated and found no traces of wash water, and sampled for surfactants and had nominal results. Follow-up investigations found no discharges as well. Called complainant to call in when discharges occur again. No call received for two months after initial complaint. Case inactive and no further action needed.	Dumping
S-0418-0048	ERTS	Lakota Creek	2800 Dash Point Rd	05-Mar-18	06-Mar-18	1221039167	679626	Resident submitted ERTS regarding Lakota Creek mudslide area and her concerns that the cleanup was not fully complete. Internal staff confirmed that project repair is complete and guard rail has been removed from the creek. No further action needed.	Other
S-0418-0051	ERTS	Lakehaven Water Main	34727 Pacific Hwy S	17-Apr-18	27-Apr-18	ROW	680695	Graham Contracting submitted ERTS report regarding turbid discharges to storm drains due to a cracked water main during construction. All impacted storm drains were cleaned. No further action needed.	Spill
S-0518-0001	Internal SWM	Lakecrest Shopping Center	28855 Military Rd S	20-Apr-18	25-May-18	0421049037	N/A	During annual inspection, internal staff noted failing BMPs behind market area, including a leaky grease tote. Violation letter sent and follow-up inspection confirmed that grease tote has been moved indoors with secondary containment and all prior discharges have been eliminated.	Poor BMPs
S-0518-0002	Internal SWM	Saigon Plaza	31248 Pacific Hwy S	25-Apr-18	08-May-18	0921049109	N/A	Internal staff noted grease discharges into storm drain during annual inspection. Violation letter sent and follow-up inspection confirmed that secondary containment is now in place for grease tote and prior discharges have been eliminated.	Poor BMPs
S-0518-0004	Internal SWM	The Ram	31920 Gateway Center Blvd S	01-May-18	31-May-18	0921049035	N/A	During annual inspection, internal staff noted leaking grease containers near a storm drain and a pile of old grease on the roadway near another storm drain, but no active discharges to system. Violation letter sent and follow-up inspection confirmed discharges have been eliminated and manager said grease totes are now on an increased, weekly maintenance schedule to prevent further discharges.	Poor BMPs
S-0518-0041	Internal SWM	Celebration Center	32057 Pacific Hwy S	04-May-18	09-May-18	1500500110	N/A	During annual inspection, internal staff observed wash water contamination in catch basin. Violation letter sent and prior discharges were confirmed to be eliminated during follow-up inspection.	Dumping
S-0518-0042	Internal SWM	South Garden Court Condos	1830 S 336th St	04-May-18	31-May-18	7880700000	N/A	During annual inspection, internal staff observed pressure washing discharges entering storm drains in the condo complex. Large amounts of sediment and cleaning agents were washed into storm drains. Violation letter sent and follow-up inspection confirmed that prior discharges were eliminated.	Poor BMPs
S-0518-0086	Internal SWM	Maaco Collision Repair & Auto Painting	32828 Pacific Hwy S	17-May-18	04-Oct-18	7978800040	N/A	During annual inspection, internal staff observed wash water and surfactant discharges entering the storm drains near garage area. Violation letter sent, and follow-up inspection confirmed all corrective actions were completed.	Poor BMPs
S-0518-0087	Internal SWM	Jim's Detail Shop	32610 Pacific Hwy S	17-May-18	28-Sep-18	1621049025	N/A	During annual inspection, internal staff observed wash water discharges in catch basins near garage area and that overflow from OWS is discharging into storm drain. Violation letter sent, and follow-up inspection confirmed that discharges were eliminated and plug is in place to prevent any overflow from OWS to storm system.	Poor BMPs
S-0518-0119	Internal SWM	Best Western	32124 25th Ave S	22-May-18	Ongoing	7978200540	N/A	During annual inspection, internal staff noted potential illicit connection. Violation letter sent and staff spoke onsite with property manager. Staff, property manager, and vector company found obstacles with vector work and discussed options for moving forward. Extension granted. Further noncompliance with addressing potential illicit connection and failure to complete required annual maintenance of storm system finally resulted in an Order to Correct. Illicit connection investigated in January 2019 and confirmed not to be an illicit connection. Vector work scheduled for the spring. Fines are currently accruing for this site and enforcement is ongoing until all corrective actions are complete.	Other
S-0518-0128	Hotline	Cedar Creek Condos	20th Ave S	31-May-18	31-May-18	N/A	N/A	Resident reported dark and stagnant water in the creek behind her residence. Internal staff investigated and found no sources of pollution. Nearby infrastructure also has low levels of flow and stagnant creek water is consistent with low flow. No further action needed.	Other

S-0618-0004	Hotline	Quiet Forest II	32716 3rd Pl S, Unit 25321	01-Jun-18	04-Jun-18	7016810000	N/A	Hotline call received regarding wash water runoff from someone cutting tiles in their driveway. Internal staff investigated and found no evidence of any discharges in the vicinity. No enforcement or further action needed.	Dumping
S-0618-0010	Internal SWM	Powell's Woods	430 S Dash Point Rd	31-May-18	31-May-18	0521049207	N/A	While at Powell's Woods for an internal meeting, staff observed wash water discharges in a deep storm structure on the property. Sample taken and tested high for surfactants. Staff attempted to identify the source but could not find any discharges upstream in the stormwater system. As the source could not be identified, case became inactive and no further action needed.	Other
S-0618-0045	Hotline	Leaking Semis	341st Pl S and 18th Pl S	11-Jun-18	12-Jun-18	ROW	N/A	Resident reported multiple semis parking in an area near his place of work that are causing oil stains on the road. Internal staff investigated the site and there were no semis present on the street name provided. Small oil stains noted in the ROW, but no active discharges or large sheens. As there were no active discharges, this case was deemed inactive. The site was added to the source control schedule to ensure no issues moving forward.	Poor BMPs
S-0618-0051	Code Enforcement	Driveway Sandbags	33513 18th Ave S	12-Jun-18	12-Jun-18	4129400020	N/A	Code compliance staff notified water quality about sand bags at the end of a driveway. Internal staff investigated the site and did not note any active discharges. All sand bags were intact and being used as a temporary fix for a portion of unstable asphalt in the driveway. Not a water quality issue and no further action needed.	Other
S-0618-0057	In Person	Northwest Plaza	840 S 333rd St	13-Jun-18	06-Sep-18	9265000150	N/A	While on a walk near City Hall, internal staff observed turbid discharges resulting from pressure washing at a site being developed. Violation letter sent, and follow-up site inspection confirmed that discharges were eliminated.	Poor BMPs
S-0618-0080	Hotline	Catherine Concrete Company	28802 8th Ave S	18-Jun-18	12-Jul-18	5152930260	N/A	Resident notified staff about colored concrete discharges into ROW from recent driveway installation at a neighbor's residence. Internal staff investigated and noted dried evidence of red concrete discharges into ROW, but only slight residue near downstream catch basins. Violation letter sent to contractor with technical assistance information. No further action needed.	Poor BMPs
S-0618-0093	Hotline	Jack in the Box	2400 SW 336th St	20-Jun-18	2-Jul-18	1321039110	N/A	Citizen called in to report cooking grease being dumped into storm drain by Jack in the Box. This site was also past their compliance period for annual maintenance of their storm system and a Notice and Order was sent. Communication with property owner and restaurant manager resulted in discharges being eliminated from storm drains, and technical assistance letter sent regarding dumpster housekeeping. Site to be added to source control check schedule.	Poor BMPs
S-0618-0098	Internal SWM	Discount Guns	1401 S. 324th St.	15-Jun-18	Ongoing	1500500140	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed on 1-18-19, after compliance deadline. Currently assessing fines for noncompliance and awaiting payment.	Other
S-0618-0099	Internal SWM	Panda Express Strip Mall	31827 Pacific Hwy S	15-Jun-18	27-Jul-18	0821049126	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed within compliance period.	Other
S-0618-0100	Internal SWM	Wells Fargo	1424 S 320th St	15-Jun-18	30-Jul-18	0821049052	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed within compliance period.	Other
S-0618-0101	Internal SWM	Concrete slurry	32431 50th Pl SW	15-Jun-18	12-Jul-18	8732190300	N/A	During an annual inspection, internal staff observed concrete slurry wash water discharging into ROW and nearby catch basin but no contractor onsite. Responsible party could not be determined, case went inactive and no enforcement taken.	Poor BMPs
S-0618-0102	Internal SWM	Kolossus SoftWash	32829 4th Ln S	20-Jun-18	11-Jul-18	9268710180	N/A	During an annual inspection, internal staff observed wash water discharges from roof washing activities. Violation letter sent to contractor with technical assistance measures. No further action needed.	Poor BMPs
S-0618-0104	Hotline	Cereghino Concrete	5121 SW 324th Pl	21-Jun-18	11-Jul-18	1898310430	682134	Resident called in to report that the contractors working on his neighbor's driveway were discharging slurry into the ROW and impacting a nearby storm drain. Internal staff investigated and instructed crew to clean out discharges right away. Workers cleaned out the impacted storm drains and violation letter sent to contractor.	Poor BMPs
S-0618-0120	Hotline	Mystery Hose	28912 5th Ave S	25-Jun-18	10-Jul-18	5152980020	N/A	Resident called in to report a hose from a neighbor's rockery that occasionally has liquid coming from it that flows to the ROW and into a storm drain. Internal staff investigated and determined source to be groundwater only from landscaping. No further action needed.	Poor BMPs

S-0618-0128	Code Enforcement	Backyard Landscaping	32808 4th Ave SW	25-Jun-18	26-Jun-18	9264911490	N/A	Code compliance staff passed along resident complaints regarding a neighbor discharging wash water and landscaping materials to a nearby storm drain. Internal staff investigated and found no evidence of any discharges at neighbor's property or in the storm drain. Instructed resident to call water quality staff if additional discharges are seen. No further reports made, case went inactive, and no further action needed.	Poor BMPs
S-0618-0129	Internal SWM	ProTouch	31414 Pacific Hwy S	26-Jun-18	21-Sep-18	0921049286	N/A	Internal staff observed large amounts of exposed sediment in the parking lot area due to excavation work on the property. Further investigation noted that the sediment has reached several onsite catch basins and resulted in turbid discharges as well. Violation letter sent and discharges were eliminated.	Poor BMPs
S-0618-0135	Internal SWM	HACT Construction	32020 1st Ave S	25-Jun-18	11-Jul-18	1721049058	N/A	Internal staff observed pressure washing activities in parking lot area of commercial property. Violation letter sent to contractor with technical assistance.	Poor BMPs
S-0618-0094	Hotline	Corliss	35053 Enchanted Pkwy S	20-Jun-18	08-Aug-18	2021049116	N/A	Hotline call received that reported track-out from sand and gravel company, Corliss. Ecology Sand & Gravel Permit coordinator notified. Ecology issued violation letter and Corliss responded with confirmation of increased BMPs to prevent track-out. Site added to source control schedule for continual monitoring moving forward.	Poor BMPs
S-0718-0061	Internal PW	Oil in CBs	SW 361st ST & 8th Ave SW	20-Jul-18	23-Jul-18	ROW	N/A	During routine catch basin inspections, internal staff observed oil in several arterial catch basins. Source could not be identified and vector company came to clean impacted catch basins under City contract.	Dumping
S-0718-0087	Internal PW	Clarion Hotel	31611 Pete von Reichbauer Way S	23-Jul-18	02-Oct-18	0921049291	N/A	Internal staff observed sediment track-out resulting from construction activities at Clarion Hotel. City's street sweeping contractor observed the discharges and eliminated most, but two catch basins still impacted. Violation letter sent and property owner eliminated the discharges to the catch basins.	Poor BMPs
S-0718-0096	Internal SWM	Illahee MS	36001 1st Ave S	24-Jul-18	03-Aug-18	3021049013	N/A	Internal staff observed what appeared to be white paint discharges in 3-4 catch basins in the ROW while conducting catch basin inspections. City issued work order with vector company to eliminate discharges. Further investigation could not determine a source. No further action needed.	Dumping
S-0718-0103	Internal SWM	Puget Sound Coach Lines	32610 Pacific Hwy S	26-Jul-18	12-Sep-18	1621049025	N/A	Internal staff conducted an inspection at a new bus washing facility and noted a strong odor of cleaning agents in and around nearby storm drain. Sample taken and tested high for surfactants. Violation letter sent, and follow-up with property manager confirmed elimination of discharges and implementation of BMPs to prevent further wash water contamination.	Poor BMPs
S-0718-0111	Internal SWM	Lakehaven Water Main Break	2nd Pl SW south of Dash Point Rd	30-Jul-18	14-Aug-18	ROW	N/A	Internal staff reported water main break that occurred while Lakehaven Water & Sewer District was performing maintenance work. Lakehaven eliminated the resulting turbid discharges. No further action needed.	Spill
S-0718-0088	Internal SWM	Commons Mall Concrete Pond	2001 S 320th St	24-Jul-18	02-Aug-18	7622400010	N/A	Internal maintenance crew reported grease discharges in the concrete vault at the Commons Mall. Further investigation found no specific source of the discharges, and determined the discharges had built up gradually over a long period of time. Further source tracing ensued, and no source could be found. Vault was cleaned out and no further action needed.	Poor BMPs
S-0718-0097	Hotline	Khalsa Gurmat Center	2835 S 344th St	25-Jul-18	03-Aug-18	6142603025	N/A	Citizen complaint received regarding prohibited discharges observed in a storm drain at the Khalsa Gurmat Center. Internal staff investigated and noted some trash and debris in the storm drain, and spoke to the center staff onsite. Violation letter sent and discharges were confirmed to be eliminated upon further investigation.	Poor BMPs
S-0718-0108	Hotline	Chevron AM/PM	27121 Military Rd S, Kent, WA 98032	28-Jul-18	30-Jul-18	2822049174	N/A	Hotline call received that reported wash water discharges from charity car wash. Further investigation found that the location is in Kent, and staff forwarded the complaint to their water quality department.	Poor BMPs
S-0818-0006	Hotline	Residential Oil Dumping	32934 2nd Pl SW	02-Aug-18	02-Aug-18	9264910350	N/A	Resident called to report oil dumped in the ROW of her cul-de-sac. Internal staff investigated and found wet spot in the asphalt. Deployed absorbent and swept up material, and then noted that the wet spot was caused by groundwater pushing up from beneath. No further action needed.	Dumping
S-0818-0035	Hotline	Cadillac	Corner of S 302nd Pl and 3rd Ave S	08-Aug-18	16-Aug-18	ROW	N/A	Resident called to report old car parked on the corner in their neighborhood for several months and an oil stain it is creating in the road. Internal staff investigated and saw no evidence of an oil stain; forwarded to PD for removal of abandoned vehicle. No further action needed.	Poor BMPs

S-0818-0049	Internal SWM	Public Storage	32615 Pacific Hwy S	13-Aug-18	31-Oct-18	1721049097	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed within compliance period.	Poor BMPs
S-0818-0050	Internal SWM	76 Station	2535 S 320th St	13-Aug-18	16-Jan-19	5999700010	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed and was scheduled within compliance period, so no fines were issued.	Poor BMPs
S-0818-0051	Internal SWM	Calvary Evangelical Lutheran Church	2415 S 320th St	13-Aug-18	11-Sep-18	7978200525	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed within compliance period.	Poor BMPs
S-0818-0075	Lakehaven	Paint in ROW	32711 17th Ave SW	17-Aug-18	22-Aug-18	0104550250	N/A	Lakehaven notified city staff about report they received from resident about paint in the ROW near Alderbrook Park. Internal staff investigated and spoke with painting contractor onsite. Bucket of paint was knocked over by a truck and paint discharges were being cleaned up when complainant came onsite. Discharges did not reach catch basin. Violation letter sent and paint cleaned up from ROW.	Dumping
S-0518-0124	Internal PW	5 gallon buckets	SR 509 Eastbound	30-May-18	30-May-18	ROW	N/A	Internal staff reported 3 abandoned, 5-gallon buckets in ROW. Internal maintenance staff investigated and discovered that buckets contained fish cleaning wastes. Disposed of buckets at maintenance facility. No further action needed.	Dumping
S-0818-0073	Hotline	Lakehaven Sewer Back-up	28620 hwy 99	19-Aug-18	19-Aug-18	3322049042	N/A	Hotline call received that reported sewage running out of apartment complex. Internal maintenance staff investigated and found that no sewage runoff has reached the MS4. Lakehaven Water & Sewer District notified of possible blockage and came onsite to clean up discharges. No further action needed.	Poor BMPs
S-0818-0079	Hotline	Residential CB Odor	2017 S 302nd Pl	20-Aug-18	16-Oct-18	7982800020	N/A	Hotline call received that reported a terrible odor coming from a storm drain in a residential cul-de-sac. Internal staff investigated and suspected possible illicit connection. TV inspection conducted but no source identified. Catch basin vactored by City. Further investigation found that nearby homeowner was washing food wastes down his downspout from an outdoor kitchen and the spoiled food caused the pungent odor. Violation letter sent, and follow-up investigation confirmed that discharges were eliminated and no further discharges have entered the system.	Poor BMPs
S-0818-0094	Internal SWM	LL Management LLC	260 SW 297th St	22-Aug-18	Ongoing	7205310070	N/A	During a single-family home site inspection, internal staff noted failing erosion control BMPs and posted a cease activity. Track-out and sediment discharges also resulted in the issuance of a violation letter from water quality. Noncompliance on the site led to a Notice and Order being issued, and staff worked with property owner to communicate BMPs moving forward. Site was confirmed to be stabilized on 1-18-19, after compliance deadline. Currently assessing fines for noncompliance and awaiting payment.	Poor BMPs
S-0818-0105	Internal SWM	Safeway	2109 SW 336th St	24-Aug-18	29-Aug-18	8732170020	N/A	While conducting source control checks, internal staff noted clear water discharging from a small drain abutting the exterior wall of store. Staff communicated with property managers and they determined that there was a blockage in their drainage system. All lines were jetted to ensure drainage efficacy. No further action needed.	Other
S-0818-0106	Internal SWM	Northshore Village Center	2140 SW 356th St	24-Aug-18	19-Oct-18	2521039002	N/A	While conducting source control checks, internal staff noted garbage and construction material discharges in storm drains. Violation letter sent, and follow-up inspection confirmed that discharges were eliminated and measures are being taken to prevent further discharges.	Poor BMPs
S-0918-0093	Internal SWM	Tacoma Floors	1001 S 344th St	21-Sep-18	18-Oct-18	2021049159	N/A	Internal staff observed pressure washing activities resulting in wash water discharges to the storm system. Property owner immediately ordered a vactor company to clean the system and staff sent a technical assistance letter.	Poor BMPs
S-1018-0003	Hotline	Marine View Oil Spill	29838 Marine View Drive	01-Oct-18	01-Oct-18	5153200130	N/A	Hotline call received that reported a fuel spill. Internal maintenance staff investigated and found a small spill that they promptly cleaned up with absorbent materials. No further action needed.	Spill
S-1118-0019	Internal SWM	Commons Mall	1928-B South Commons	01-Nov-18	27-Nov-18	7622400010	N/A	While conducting source control site checks, internal staff noted a lot of garbage and debris near the cinema dumpster area. Violation letter sent, and follow-up inspection confirmed corrective actions were complete.	Poor BMPs

S-1118-0020	Email	Jet Chevrolet	35700 Enchanted Pkwy S	02-Nov-18	06-Nov-18	2821049069	N/A	Lakehaven staff notified City staff about wash water discharges in parking lot area. Internal staff investigated and observed active wash water discharges and oil stains across parking lot. Notified manager onsite and they began immediately eliminating all discharges. Technical assistance violation letter sent, no further action needed.	Poor BMPs
S-1118-0021	Hotline	Twin Lakes House Fires	32202 and 32210 40th Pl SW	05-Nov-18	05-Nov-18	8731960390, 8731960380	N/A	Hotline call received about a gas main repair in neighborhood with recent house fires. Internal staff investigated and did not observe any illicit discharges entering the stormwater system or surface waters as a result of the firefighting activities. No further action needed.	Other
S-1118-0045	Hotline	Colonial Forest Condos	32600 1st Ave S	09-Nov-18	15-Nov-18	1697300000	N/A	Citizen called in to notify City staff about a possible harmful substance being used to clean rooves in her condo complex. Internal staff investigated and found no such chemicals or evidence of discharges. Staff also spoke with property management who assured they are using all proper BMPs with regards to property maintenance. As no discharges were found, case closed for inactivity and no further action needed.	Poor BMPs
S-1118-0028	Internal PW	Car Fire	1st Way SW & 1st Ct SW	06-Nov-18	21-Nov-18	ROW	N/A	Internal staff observed a car fire with potential discharges. Internal inspectors investigated and found that debris from the fire impacted several arterial catch basins. Work order submitted for City contractor to vacator catch basins. Once cleaned, no further action needed.	Spill
S-1118-0093	Hotline	Gas Spill	150 South 294th Place	21-Nov-18	21-Nov-18	ROW	N/A	Hotline call received about a gas spill on the street. Internal staff investigated and found just traces of oil left, and no liquid gas to clean up. No further action needed.	Spill
S-1118-0116	Internal SWM	Sparks Car Care	32627 Pacific Hwy S	01-Nov-18	01-Nov-18	0380900045	N/A	While conducting source control checks, internal staff observed a large oil sheen in front of the garage area. Spoke with manager onsite and they immediately cleaned up the oil spill. No further action required.	Poor BMPs
S-1118-0117	Internal SWM	E F Autosales LLC	1710 S 341st Pl	15-Nov-18	15-Nov-18	3903800130	N/A	While conducting source control checks, internal staff observed a small antifreeze spill in front of the garage. Spoke with manager onsite and he immediately cleaned up the spill and put a drip pan under the leaking vehicle. No further action needed.	Poor BMPs
S-1118-0118	Lakehaven	Taqueria la Tentacion	28718 Military Rd	06-Nov-18	06-Nov-18	5529000230	N/A	Lakehaven notified City staff about possible dumping of grease from a food truck. Internal staff investigated and found that the catch basin in question was full of decomposing leaves, but no grease discharges. No further action needed.	Poor BMPs
S-1118-0119	Internal SWM	E&E Foods	34100 9th Ave S	14-Nov-18	17-Jan-19	1321800020	N/A	During the commercial site inspection, internal staff observed fish processing wastes being improperly handled at the site. Technical assistance letter sent to manager and City staff conducted walk-through with BMPs at the facility. Inspection correction notice sent for stormwater system maintenance and all maintenance completed. No further action required.	Poor BMPs
S-1118-0126	SKFR	A&A Autobody	33905 Pacific Hwy S	30-Nov-18	7-Jan-19	2021049090	N/A	South King Fire & Rescue notified Water Quality staff about a site with large amounts of automotive debris near wetland. Internal staff investigated and confirmed large amounts of debris in storage yard and uncovered vehicles and vehicle parts. Violation letter sent, and discharges confirmed to be eliminated during follow-up inspection. Secondary containment also being used. Nothing further.	Poor BMPs
S-1118-0127	Email	Payless Auto Mart	29805 Pacific Hwy S 98003	30-Nov-18	06-Dec-18	0421049157	N/A	Lakehaven notified City staff about potential automotive discharges throughout parking lot at towing shop. Internal staff investigated and confirmed several discharges throughout lot. Informed onsite staff and they cleaned all discharges up immediately. Technical assistance violation letter sent; nothing further required.	Poor BMPs
S-1218-0009	Hotline	Residential CB Discharge	#6292 616 South 328th Place	28-Nov-18	29-Nov-18	ROW	N/A	Hotline call received about oily, sticky substance in residential catch basin. Internal staff investigated and noted oil discharges on lid and in catch basin. Work order submitted for new grate lid and vacotring of catch basin. Once complete, internal staff disseminated BMP resources to area residents as the source of the discharges was unknown. No further action required.	Poor BMPs
S-1218-0013	Internal SWM	Lennar Northwest Inc.	Retreat Meadows Short Plat, 1st Way S.	27-Nov-18	28-Nov-18	ROW	N/A	Internal staff observed turbid discharges at residential short plat site. Contractor began implementing BMPs to contain sediment. Further inspections confirmed sediment containment. No further action required.	Poor BMPs
S-1218-0026	Internal SWM	Water Bury Apartments	32905 19th Pl S	08-Jun-18	27-Jul-18	7978800360	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vacator work completed within compliance period.	Poor BMPs
S-1218-0027	Internal SWM	David Messner (Property Manager)	33434 8th Ave S	26-Jun-18	9-Jan-19	6064300000	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vacator work completed within compliance period.	Poor BMPs

S-1218-0028	Internal SWM	32020 Professional Plaza LLC	32020 1st Ave S	08-Jun-18	Ongoing	1721049058	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Letter returned to sender as undeliverable and another copy sent to new address. Awaiting completed notice and compliance.	Poor BMPs
S-1218-0029	Internal SWM	Kindercare Learning Centers	33504 13th Pl S	08-Jun-18	Ongoing	9265030035	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed on 1-16-19, after compliance deadline. Currently assessing fines for noncompliance and awaiting payment.	Poor BMPs
S-1218-0030	Internal SWM	Kaiser Permanente of WA	301 S 320th St	13-Jun-18	13-Dec-18	1721049105	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed within compliance period.	Poor BMPs
S-1218-0031	Internal SWM	Children's World Learning	32324 1st Ave S	14-Jun-18	12-Nov-18	1721049137	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed within compliance period.	Poor BMPs
S-1218-0035	Internal SWM	Branches Garden Center LLC	3909 S 320th St	05-Jun-18	Ongoing	2368000040	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Granted two week extension based on the quantity of work to be done. Awaiting compliance.	Poor BMPs
S-1218-0036	Internal SWM	Trinity Glass International	33615 1st Way S	26-Sep-18	11-Oct-18	9265040180, 9265040190	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed within compliance period.	Poor BMPs
S-1218-0037	Internal SWM	New Church of Federal Way	33901 9th Ave S	26-Sep-18	20-Dec-18	9264800160	N/A	Noncompliance with annual stormwater maintenance requirements resulted in issuance of Notice and Order. Vactor work completed within compliance period.	Poor BMPs
S-1218-0050	Internal SWM	Federal Way High School	30611 16th Ave S	11-Dec-18	Ongoing	0821049001	685912	Internal staff observed heavy turbid discharges flowing from the high school construction site and submitted ERTS. Violation letter sent. Further investigations continue to note failing erosion control BMPs and samples taken are highly turbid. Notice and Order issued. Discharges are not yet under control. Daily fines are accruing as contractor works toward compliance.	Poor BMPs
S-1218-0055	Internal SWM	Optimus Construction	3700 S 320th St	13-Dec-18	20-Dec-18	5515600037	N/A	While conducting the commercial site inspection, internal staff observed pressure washing activities that caused wash water and sediment to enter several onsite catch basins. Violation letter sent, and follow-up inspection confirmed that all impacted catch basins and nearby open conveyance were cleaned.	Poor BMPs
S-1218-0057	Code Enforcement	Eric Matsumoto	32340 19th Ct SW	13-Dec-18	14-Dec-18	0104540630	N/A	Code Enforcement staff notified Water Quality staff about a muddy sidewalk area that could be a potential illicit discharge. Internal staff investigated and found that sidewalk area was cleaned by owner. No stormwater impacts.	Poor BMPs
S-1218-0065	Internal SWM	Club Palisades Apartment	2211 S Star Lake Rd	14-Dec-18	Ongoing	7204800095	N/A	While conducting site inspections, internal staff observed leaking fluids from the compactor and debris littered in the disposal area. Violation letter sent. Property manager is working on compactor repairs and additional BMPs. Awaiting final confirmation of compliance from property manager.	Poor BMPs
S-1218-0083	ERTS	New Storage Facility Construction Site	33620 21st Ave SW	19-Dec-18	21-Dec-18	2421039001	686069	ERTS report received regarding turbid discharges coming from a residential construction site. Internal staff investigated and spoke with site manager. All BMPs are in place and functioning properly. No turbid discharges observed, nor impacts to stormwater system. No further action required.	Poor BMPs
S-1218-0113	ERTS	Costco Gasoline	35100 Enchanted Pkwy S	27-Dec-18	27-Dec-18	2192600290	686271	ERTS report received regarding oil spill from overfilling vehicle at gas pump. Report stated that the spill had already been cleaned up by Costco gas employees. No impact to storm system. No further action needed.	Spill
S-1218-0110	Internal SWM	Federal Way City Hall	33325 8th Ave S	26-Dec-18	26-Dec-18	9265000290	686396	Tanker truck had a diesel spill behind City Hall while trying to refill the generator. Internal staff responded and deployed absorbent materials. No impact to storm system. No further action required.	Spill
S-1218-0124	Code Enforcement	Suspected Mobile Home Discharge	33305 43rd Ave SW	28-Dec-18	Ongoing	1421039043	N/A	Code Enforcement staff notified Water Quality staff about a possible ongoing illicit discharge/connection at a residential property abutting upper Joe's Creek. King County Health officials did a site investigation but did not follow up with enforcement because no active discharges were noted. Days later a neighbor called into the hotline to report the activities, and Water Quality staff sampled upstream and downstream of the property. Awaiting lab analysis to direct potential enforcement.	Dumping



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Jim Ferrell, Mayor

December 12, 2018

Danielle DeVoe, Municipal Stormwater Permit Coordinator
Water Quality Program
Department of Ecology
300 Desmond Drive SE
Lacey, WA 98504-7600

RE: Requested follow up documentation regarding Catch Basin Inspection Schedule for Public Stormwater Facilities Regulated by the City of Federal Way

Dear Danielle,

This written statement by the City of Federal Way (City) serves to document changes in the City's catch basin inspection program to comply with the 2012 Western Washington Phase II Municipal Stormwater Permit (permit), Special Condition S5.C.5.d, which outlines options available to Permittees for inspection schedules of stormwater catch basins.

Public Works has been designated by the Mayor of the City of Federal Way as the Department responsible for implementation of the permit. The Surface Water Management Division (SWM) has been identified as the lead for implementation of Special Condition S5.C.5.d, maintenance of stormwater facilities owned or operated by the City. As such, SWM successfully implemented a catch basin inspection schedule for non-arterial catch basins based on drainage basins, average land use, topography, maintenance records, and collected data from inspections conducted since 2012. This allowed for an inspection of all catch basins to occur at least once by August 1, 2017.

The City's catch basin inspection schedule applies to non-arterial catch basins only, as the City's current inventory of 3,381 arterial catch basins is inspected and cleaned annually. The remaining 9,212 CBs were inspected on a schedule that was based on an analysis of inspection and cleaning records during the calendar years 2002 to 2008. In February 2018 Department of Ecology's (Ecology) Municipal Stormwater Permit Coordinator for South King County, Ben Billick, reviewed the City's analysis and resultant alternate inspection program and determined the City's schedule was a hybrid of an alternate less frequent approach and a circuit approach, as outlined in Department of Ecology Publication Number 13-10-019, *Catch Basin Inspection Alternative for Phase I and II Municipal Stormwater Permittees*. After conversations with Ecology staff and in response to Ecology's review of the City's program, provided as Attachment 1, SWM has made modifications to the inspection schedule as of June 2018 to incorporate suggestions from Ecology. This letter is provided as the requested follow up documentation of those modifications.

The City confirms that the catch basin alternate inspection schedule is identified by 'circuits' that were established based on three factors: average land use, street designation (non-arterial), and configuration of the MS4. In response to Ecology's review on the status of the off year circuits, i.e. circuits not included within the current year's annual inspections, SWM has modified the annual inspections of non-arterial catch basins to include an inspection of 25% of each off-year circuit in addition to the regularly scheduled circuits. This will enable the City to complete an inspection of all catch basins within the two-year requirement under this permit cycle and collect the data for analysis of the City's circuits for future implementation of a less frequent inspection schedule.

SWM has incorporated an annual assessment which will review the City's circuit schedules, actual inspection results, cleaning and maintenance records, new development or redevelopment schedules, changes in commercial use, and evaluation of previous year's snow and ice operations. SWM will use this assessment to adjust the City's circuits in order to comply with the requirements of an alternate inspection schedule under the next permit cycle. To assist with this effort, SWM has implemented a new inspection program using real time mobile technology that provides more accurate measuring and tracking of catch basin sediment levels. The technology also provides better record keeping, ensuring that maintenance is performed on those catch basins meeting or exceeding the threshold within the six (6) month permit required time period.

Pursuant to Ecology's recommendations, the City has modified its hybrid approach to catch basin schedules to better align with permit requirements and has incorporated an annual assessment of the program to plan for an alternate inspection schedule approach.

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violation.

Sincerely,



EJ Walsh, P.E.
Public Works Director

EW/tt:mt

cc: Leah Myhre, NPDES Coordinator
Dayfile