City of Olympia
2024 Stormwater Management Program Plan

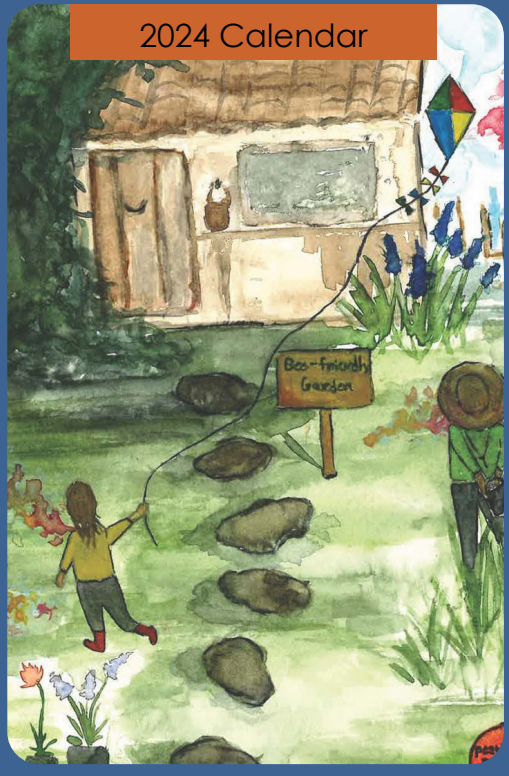


Table of Contents

List of Tables

Appendices

Introduction

Purpose of the Stormwater Management Program Plan (SWMP Plan)

All stormwater runoff flowing through Olympia's catch basins, pipes, ponds, and ditches is managed according to the requirements of a permit first issued by the Washington State Department of Ecology (Ecology) in January of 2007. The *Western Washington Phase II Municipal Stormwater Permit*; *National Pollutant Discharge Elimination System* (NPDES) *and State Waste Discharge General Permit for discharges from Small Municipal Separate Storm Sewers in Western Washington* (Permit) requires the City to take actions such as educate the public and encourage non-polluting behaviors, respond to spills, look for illegal dumping and cross-connections, enforce erosion and sediment control at construction sites, and use best practices for land management and stormwater system maintenance.

This Stormwater Management Program Plan (SWMP Plan) is designed to reduce the discharge of pollutants from Olympia's regulated MS4 (municipal separate storm sewer system) to the maximum extent practicable, meet state AKART (all known and reasonable technologies) requirements, and protect water quality and beneficial uses of local receiving waters.

Implementation Timing

The City of Olympia currently operates under the 2019-2024 NPDES Permit. The permit was re-issued July 1, 2019 and became effective August 1, 2019. This is the third generation of the NPDES Permit. The next five-year permit cycle is 2024-2029.

A Gantt Chart was created to help illustrate program task requirements and current schedule status. The Gantt Chart can be viewed at the end of this document in Appendix A.

Olympia Storm and Surface Water Utility – Other Activities

The Utility maintains over 157 miles of underground drainage pipe, over 7,700 storm drains, and 433 stormwater treatment and flow control BMPs/facilities which carry stormwater runoff from roads and rooftops to our streams and Budd Inlet. We work on many levels to prevent flooding and protect water quality and aquatic habitat. This involves working closely with residents, businesses, and other government agencies to maintain a safe and healthy environment for people and wildlife.

Relationship to Other Plans

The Storm and Surface Water Utility is guided by the 2018 Storm and Surface Water Plan (Plan). The Plan was adopted on April 10, 2018 by the Olympia City Council. This Plan aligns with Olympia's Comprehensive Plan and focuses on the programs and policies of the Utility. This SWMP Plan represents a subset of the activities performed and is coordinated by the Utility across the City organization specifically governed by the Permit.

The Permit as Document Map

This SWMP Plan follows section S5 of the Permit and is required to be updated each year. The tables below identify permit requirements on the left column with a description about how the City of Olympia is implementing those requirements on the right column. Permit requirements are shared between multiple lines of business at the City as part of ongoing programs.

Stormwater Planning (S5.C1.)

Table 1 summarizes the requirements of Permit Special Condition S5.C1 and outlines the corresponding activities.

Table 1. Stormwater Planning

Permit Requirements	Planned and Ongoing Activities
Each Permittee shall implement a Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. *a. By August 1, 2020, each Permittee shall convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.*	City of Olympia has created *an interdisciplinary team* which includes staff from Parks, Arts and Recreation, Community Planning and Development, and Public Works departments. These departments worked together to develop a Charter which was completed in September 2020 to meet the NPDES stormwater planning requirements. This team continues to meet intermittently as needed for planning discussion items that arise. And has been tapped for discussion during the development of the Stormwater Management Action Plan (SMAP). On October 5, 2023, 40 staff associated with the interdisciplinary team as well as some field staff attended a Stormwater Workshop. The purpose of this workshop was to reinforce the significance of water quality protection among staff, provide essential training, acknowledge commendable successes, and gather valuable feedback through a survey. The keynote address included messages from Squaxin Island Tribe Vice Chair Jaimie Cruz and City Councilmember Dani Madrone.
b. Coordination with long-range plan updates. *i. Each Permittee shall describe how stormwater management needs and protection / improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies in their jurisdiction. The reporting shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning or taking into account stormwater management needs or limitations.*	Multiple meetings and discussions by the interdisciplinary team have occurred. This team has been working to answer permit-related planning questions by reviewing existing long-range plans and are developing ideas on incorporating stormwater management goals into future planning processes and documents. Team members reviewed existing long-range plans to determine how stormwater management needs and protection and/or improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies in Olympia. Plans reviewed by this team included the following: • Comprehensive Plan (adopted December 16, 2014, and current through an amendment passed November 2021) • Parks, Arts & Recreation Plan (2022-2028) • Transportation Master Plan (2021) • Wastewater Management Plan (2020) • Water System Plan (Draft 2022) This plan has no reference of stormwater impacts on water quality. • Waste Resources Management Plan (Draft 2023) • Adopted Capital Facilities Plan (2023-2028) • *Storm and Surface Water Plan* (2018) This plan sets strategic goals for the Storm and Surface Water Utility. The details are not provided in the tables below. View complete document here: *https://www.olympiawa.gov/services/water_resources/water_plans,_regulations___reports/storm___surface_water_plan.php* As required by the permit, a review and response to Stormwater Planning Annual Report questions was completed by March 31, 2021 and again by January 1, 2023.

c. Low impact development code-related requirements.	Olympia continues to require LID Principles and LID BMPs when updating, revising, and developing new municipal codes, rules, standards, or other enforceable documents, as needed. LID regulations were passed by Olympia's City Council on July 12, 2016. LID is designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible is the preferred and commonly-used approach and method to site development. Annually, Olympia will assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs.
d. Stormwater Management Action Planning	Olympia has assessed existing information related to our local receiving waters and contributing area conditions to identify which receiving waters will most likely benefit from stormwater management planning. Based on this analysis a catchment within the Indian Creek basin was selected for development of a full Stormwater Management Action Plan.
Receiving Water Assessment *Due no later than March 31, 2022*	The assessment includes a watershed inventory with a brief description of the relative existing conditions of the receiving waters and the contributing areas. The inventory includes each receiving water name, its total watershed area, the percent of the total watershed area that is in Olympia's jurisdiction, and findings of stormwater management influence assessment for each basin. An updated map of the delineated basins is also included.
Receiving Water Prioritization *Due no later than June 30, 2022*	Olympia developed and implemented a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SWMP actions, and other land/development management actions. In addition to findings from the receiving waters assessment, prioritization was informed by a community-based process that includes input from other City departments, local natural resources and planning organizations, local tribes, the City of Olympia Utility Advisory Committee, and the public.
Stormwater Management Action Plan (SMAP) *Due no later than March 31, 2023*	Olympia's SMAP for Indian Creek catchment area identifies: a) A description of the stormwater facility retrofits needed for the area, including the BMP types and preferred locations. b) Land management/development strategies and/or actions identified for water quality management. c) Targeted, enhanced, or customized implementation of stormwater management actions related to permit sections within S5, including: • IDDE field screening, • Prioritization of Source Control inspections, • O&M inspections or enhanced maintenance, or • Public Education and Outreach behavior change programs Identified actions support other specifically identified stormwater management strategies and actions for the basin overall, or for the catchment area.

	d) If applicable, identification of changes needed to local long-range plans, to address SMAP priorities. e) A proposed implementation schedule and budget sources for: • Short-term actions (i.e., actions to be accomplished within six years), and • Long-term actions (i.e., actions to be accomplished within seven to 20 years). A process and schedule to provide future assessment and feedback to improve the planning process and implementation of procedures or projects.

Public Education and Outreach (S5.C2.)

Table 2 summarizes the requirements of Permit Special Condition S5.C2. and outlines the corresponding activities.

Table 2. Public Education and Outreach

Permit Requirements	Planned and Ongoing Activities
Include an education and outreach program designed to: • *Build general awareness about methods to address and reduce stormwater runoff.* • *Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.* • *Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.*	The Olympia Storm and Surface Water Utility has a robust public outreach and education program. The Utility employs two dedicated full-time staff focused on developing and implementing general awareness, stewardship, and pollution prevention programs. Place-based programs and activities are designed to increase understanding and connection to the aquatic habitats and receiving waters that the Utility works to protect. These programs emphasize the effects of stormwater runoff on people, habitats, and wildlife that rely on healthy water sources. They include a range of pollution prevention engagement initiatives addressing multiple audiences. These programs offer information and resources to promote best management practices and stewardship actions that protect water quality.
The minimum performance measures: *a. Each Permittee shall implement an education and outreach program for the area served by the MS4.* *i.* ***General awareness.*** *To build general awareness, Permittees shall annually select at a minimum one target audience and one subject area*	Each year Olympia engages in the Puget Sound Starts Here Month campaign. Olympia participated in and contributed financially to the regional Don't Wait to Inflate digital media campaign. The 2023 campaign focused on reducing tire wear particles and 6PPD-Q. Additionally, staff distributed 2,500 BMP coffee sleeves to 17 Olympia bars and restaurants. . . Olympia holds an ILA with South Sound Green to deliver a high-quality K-12 environmental education program. The program focusses on water quality testing and analysis and near shore habitat ecosystems. Additionally, Olympia sponsors the *Water Resources Stewardship Through Art calendar* contest for middle-school students. In 2023, Olympia piloted Stormwater Week at Washington Middle School reaching 230 6th grade students. The pilot was extremely successful. Staff have plans to expand the curriculum to additional middle schools in 2024., In 2023, Olympia and REEP partners deepened their collaboration with CIELO, a community support organization dedicated to promoting community, self-sufficiency, and leadership among Latinos in the South Puget Sound region. Staff participated in three Cielo-sponsored events. Additionally, the partners collaborated with CIELO staff to co-create three events aimed at educating attendees about aquatic habitats and species, as well as actions to protect them. For each of these events, transportation, food, and translation services were provided to increase participation and accessibility to the Latin-X community.
a) Target Audiences: General public (including overburdened communities, or school age children) or businesses (including home-based and mobile businesses) *b) Target Audiences: Engineers, contractors, developers, or land use planners*	A newsletter called "Five Things" is inserted into all utility bills provided to utility customers. This insert provides education and outreach for all our programs. Illicit discharges and improper disposal of waste and stormwater pollution prevention practices are specifically addressed. Additional information is provided to city staff during onboarding, during trainings, and with signage in appropriate work locations. Staff continued work with regional partners to prioritize diversity, equity, and inclusion in our outreach and engagement programs. In the fall, partners implemented a one-day facilitated equity retreat to begin the development of a five-year equity plan. In 2023, outreach materials covering a range of topics were translated

c) Permittees shall provide subject area information to target audience on an ongoing or strategic schedule.	into Spanish. This effort included updating and translating the Temporary Erosion and Sediment Control (TESC) BMP Guidance flip book for contractors and developers into Spanish.
*ii. **Behavior change**. To affect behavior change, permittees shall select, at a minimum, one target audience and one BMP.* • *Target Audiences: Residents, landscapers, property manages/owners, developers, school age children, or businesses (including home-based or mobile businesses)* • *By February 1, 2021, each Permittee shall follow social marketing practices and methods, similar to community-based social marketing, and develop a campaign that is tailored to the community, including development of an evaluation plan.* • *Develop a strategy and schedule for a new target audience and BMP behavior change campaign. No later than April 1, 2021.* • *By March 31, 2024, evaluate and report on the changes in understanding and adoption of targeted behaviors resulting from the implementation strategy and any planned or recommended changes to the campaign in order to be more effective.*	To meet permit requirements, the City of Olympia partnered on a Regional *Dumpster Lid Social Marketing Campaign*. The regional group working on the dumpster lid campaign became known as the Dumpster Outreach Group (DOG). Internally, the team consisted of Olympia Water Resources and Waste Resources staff. The campaign is focused on commercial businesses using dumpsters. Elements of the program include the importance of 'Why' keeping dumpster lids closed is a water quality issue, as well as dumpster area best management practices, to keep pollutants out of stormwater. During 2022 staff sent outreach letters to 81 businesses with observed open lids. Additionally, staff conducted 60 on-site visits with business owners, managers, and staff. Site visits included delivering BMP outreach materials, placing stickers and signs in dumpster areas and placing window clings for businesses pledging to keep dumpster lids closed. In 2023, staff continue to move forward with this body of work. Dumpster lid data collection took place from July 2023 through January 2024. The data collected includes information on closed lids. A final evaluation report will be completed by March 31, 2024. This report will document changes in understanding and adoption of behaviors related to closed lids and recommend changes to the campaign to increase its effectiveness.
*iii. **Stewardship.** Each Permittee shall provide and advertise stewardship opportunities and/or partner with existing organizations (including non-permittees) to encourage residents to participate in activities or events planned and organized within the community.*	The City of Olympia partners with Thurston County and the Cities of Tumwater and Lacey in a Regional Environmental Education Partnership (REEP). The partnership has existed for over 30 years and is known as Stream Team of Thurston County. The partnership is formally acknowledged in an Interlocal Agreement with an annual work plan and budget. The partnership continues to provide exceptional outreach to residents of Thurston County. A quarterly newsletter, monthly emails, social media posts and website advertise stewardship events and activities and actions for clean water sponsored by the city and partners. *Home - Stream Team* Water Resources also continues to partner with Parks, Arts & Recreation on stewardship activities through vegetation, habitat, and restoration work such as volunteer invasive species removal and tree planting activities at city-managed greenspaces. In 2021, the City of Olympia became a certified Bee City USA affiliate, committed to reversing the trend in declining bee pollinator species by decreasing the amount of pesticides used, creating opportunities for pollinator habitat, and providing educational resources for the public. *Bee City (olympiawa.gov)*

Public Involvement and Participation (S5.C3.)

Table 3 summarizes the requirements of Permit Special Condition S5.C3. and outlines the corresponding activities.

Table 3. Public Involvement and Participation

Permit Requirements	Planned and Ongoing Activities
Permittees shall provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities.	The Stormwater Management Program Plan (SWMP) and National Pollutant Discharge Elimination System (NPDES) annual report are discussed, reviewed, and amended through a formal public review process that includes the Utility Advisory Committee (UAC) Work Plan and meetings. Additional special recognition events are featured at City Council meetings as appropriate, to highlight local pollution prevention and stewardship events and campaigns.
The minimum performance measures: *a. Permittees shall create opportunities for the public, including overburdened communities, to participate in the decision-making process involving the development, implementation and update of the Permittee's SMAP and SWMP.*	City staff have been participating in Environmental Justice meetings organized by Washington Storm Center to determine 1) how to better meet permit compliance and identification of tools for jurisdictions, and 2) how to better improve the permit writing process through discussions with other stakeholders including Tribes, NGO's, Environmental Groups, and other agencies. Staff have also been communicating with the new Diversity and Equity committee coordinator for ideas and feedback in our efforts to develop stormwater programs, especially in the development of the Stormwater Management Action Plan (SMAP). Our local Regional Environmental Education Partnership (REEP) was tasked in their 2021 workplan to identify overburdened communities across the county and consider outreach approaches. This effort has led to the development of an equity index. A service equity analysis of education and outreach efforts over the past ten years was completed in 2022. This information guides outreach and engagement planning to ensure programs are inclusive, accessible and representative of the entire community and result in fair distribution of benefits in Olympia and county-wide.
b. Each permittee shall post on their website their SWMP Plan and the annual report required under S9.A, no later than May 31 each year.	The City of Olympia posts the SWMP Plan on the Water Plans, Regulations & Reports page no later than May 31 each year. The Annual update can be found under State regulations: Western Washington Phase II Municipal Stormwater Permit. Water Plans, Regulations & Reports (olympiawa.gov)

MS4 Mapping and Documentation (S5.C4.)

Table 4 summarizes the requirements of Permit Special Condition S5.C4. and outlines the corresponding activities.

Table 4. MS4 Mapping and Documentation

Permit Requirements	Planned and Ongoing Activities
Include an ongoing program for mapping and documenting the MS4. ***Minimum performance measures:*** *a. Ongoing Mapping. Each Permittee shall maintain mapping data for the features listed below.*	The City has mapped tributary conveyances to, and including, all known outfalls and discharge points within the City of Olympia. A map of these basins appears in Appendix A. Ongoing mapping continues within the City of Olympia to improve spatial coverage and overall data quality. The City also performs CCTV inspections as part of an asset management program to better understand the integrity of the MS4 system, prioritize repair work, and reduce related risks. New connections to the MS4 are identified through the Community Planning and Development review and building permit process. The permit review requires submittal of electronic copies of newly constructed drainage systems that will be turned over to Public Works for post-construction facility inspection and maintenance. As-built documentation is archived and available for all new development projects. Private connections allowed under new permits are manually added to the City's MS4 mapping data set by GIS personnel.
b. New Mapping. *i. No later than January 1, 2020, begin to collect size and material for all known MS4 outfalls during normal course of business (e.g. during field screening, inspection, or maintenance) and update records.* *ii. No later than August 1, 2023, complete mapping of all known connections from the MS4 to a privately-owned stormwater system.*	The City has been collecting size and material for all known MS4 outfalls prior to this permit requirement. A continued effort to update our data is an ongoing aspect of the program. Discharges to private systems have been and will continue to be identified while mapping of the MS4 All known connections from the MS4 to a privately-owned stormwater system have been identified and mapped.
c. No later than August 1, 2021, the required format for mapping is electronic with fully described mapping standards.	The City is mapping in the required electronic format and uses ArcGIS ESRI software and geodatabases housed on City servers.
d. To the extent consistent with national security laws and directives, each Permittee shall make available to Ecology, upon request, available maps *e. Upon request, and to the extent appropriate, Permittees shall provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees.*	The City is prepared to respond appropriately to any mapping requests.

Illicit Discharge Detection and Elimination (S5.C5.)

Table 5 summarizes the requirements of Permit Special Condition S5.C5. and outlines the corresponding activities.

Table 5. Illicit Discharge Detection and Elimination

Permit Requirements	Planned and Ongoing Activities
Include an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. ***Minimum performance measures:***	The City of Olympia achieves compliance with S5.C.5 through implementation of the programs described in this section. Olympia has an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.
a. The program shall include procedures for reporting and correcting or removing illicit connections, spills, and other illicit discharges when they are suspected or identified.	Olympia implements the *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual – May 2020* Revision to meet these requirements. *https://www.wastormwatercenter.org/permit-assistance/municipal/permit-assistance-2/ic-id/*
b. Permittees shall inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.	Residents and businesses throughout Olympia receive information about hazards associated with illicit discharges and improper disposal of waste through the Utility Billing Insert *Five Things Newsletter and Stream team Newsletter and social media.* Additionally, businesses contacted through the Dumpster Lid Campaign received outreach materials on how to manage waste and hazardous waste, how to report and respond to spills and how to store and contain cooking oils and other hazardous liquids. All new employees to Olympia receive information on how to identify spills and illicit discharges and to contact Public Works dispatch at 360-753-8333 for proper response, containment and cleanup.
c. Each Permittee shall implement and ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law.	The Olympia Municipal Code Chapter 13.16 *Storm and Surface Water Management* provides for the regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the City's MS4 to the maximum extent allowable under state and federal law. *Chapter 13.16 STORM AND SURFACE WATER MANAGEMENT (codepublishing.com)* Specific sections of the municipal code that meet this requirement are identified below: • Ch 13.16.030 Prohibited uses of the storm drainage system • Ch 13.16.040 Discharge or connection to storm drainage system • Ch 13.16.150 Right of entry for inspection, code enforcement and repair • Ch 13.16.180 Enforcement – Civil and criminal penalties – Public nuisance

Permit Requirements	Planned and Ongoing Activities
d. Each Permittee shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4. *The program shall include the following components: Procedures for conducting investigations of the Permittee's MS4, including field screening and methods for identifying potential sources. These procedures may also include source control inspections.* • *All Permittees shall complete field screening for an average of 12% of the MS4 each year.*	Each year the Stormwater Utility implements a Pipe Conveyance Screening Program to inspect storm sewer pipes for condition rating and maintenance needs. During these CCTV screenings, staff and/or contractors also investigate signs of illicit discharges and cross-connections. The Utility screens an average of 35 percent of the MS4 each year. This percentage includes inspections of conveyance pipes, catch basins, maintenance holes, and stormwater treatment and flow control devices. The calculation is based on total inspection and asset count data collected from various database management systems. For conveyance pipes, data is gathered using CCTV using GraniteNet software from CUES, Inc., which includes length televised and Pipeline Assessment Certification Program (PACP) related information. For catch basin, maintenance holes, treatment, and flow control devices, data is collected using ESRI's Field Maps Applicator, which includes condition reports and inspection work order asset tracking. During the last permit cycle, the Utility also screened all known stormwater outfalls and other locations where stormwater leaves the MS4, to check for any illicit discharge indicators, including dry weather flow and other evidence of non-permitted substances. Olympia publicly lists and publicizes the Public Works Dispatch telephone number (360-753-8333) for public reporting of spills and other illicit discharges. All municipal field staff, who as part of their normal job responsibilities, might encounter or otherwise observe an illicit discharge and/or illicit connection to the MS4, have been trained on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. Follow-up training is provided as needed to address changes in procedures, techniques, requirements, or staffing. The most recent training for all municipal field staff occurred in February 2021.
e. Each Permittee shall implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4.	Olympia's ongoing illicit discharge program includes the following: • Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the City, as well as procedures to address the evaluation of whether the discharge must be immediately contained and steps to be taken for containment of the discharge. • Procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening maintenance holes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures. • Procedures for eliminating the discharge, including notification of appropriate authorities (including owners or operators of interconnected MS4s); notification of the property owner; technical assistance; follow-up inspections; and use of the compliance strategy developed pursuant to S5.C.5.c.iv, including escalating enforcement and legal actions if the discharge is not eliminated. • Compliance with above is achieved by meeting the following timelines: • Immediate response to, and reporting of, all illicit discharges including spills, which are determined to constitute a threat to human health, welfare, or the environment, consistent with General Condition G3.

Permit Requirements	Planned and Ongoing Activities
	• Investigate (or refer to the appropriate agency with the authority to act) within 7 days, on average, any complaints, reports, or monitoring information that indicates a potential illicit discharge. • Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection, to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection. • Upon confirmation of an illicit connection, use of the compliance strategy in a documented effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 are eliminated.
f. Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of the training provided and the staff trained.	All municipal field staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills and illicit connections, are trained to conduct these activities. Ongoing training occurs as needed and appropriate, to address changes in procedures, techniques, and requirement of staffing. The most recent training for all municipal field staff occurred in February 2021. On October 5, 2023, key staff responsible for stormwater management and programmatic elements of the permit received training. The training included a high-level overview of illicit discharge identification, spill prevention, and incident reporting.
g. Recordkeeping: Each Permittee shall track and maintain records of the activities conducted to meet the requirements of this Section.	Olympia tracks and maintains records of the activities conducted to meet the requirements of this section. All discharges that meet G3 notification requirements are submitted to WA Ecology's ERTS system. In the Annual Report, Olympia submits data for the illicit discharges, spills and illicit connections including those that were found by, reported to, or investigated by the Stormwater Utility during the previous calendar year. The data includes the information specified in Appendix 12 and WQWebIDDE. Spill related service requests and inspections are currently stored in the CityWorks work order and workflow tracking system

Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C6.)

Table 6 summarizes the requirements of Permit Special Condition S5.C6. and outlines the corresponding activities.

Table 6. Controlling Runoff from New Development, Redevelopment, and Construction Sites

Permit Requirements	Planned and Ongoing Activities
Implement and enforce a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities. The program shall apply to private and public development, including transportation projects. ***Minimum performance measures:*** *a. Implement an ordinance or enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.* *Each Permittee shall adopt and make effective a local program, no later than June 30, 2022, that meets the requirements of S5.C.6.b(i) through (iii), below…*	Current codes and rules are set forth in the following list: OMC Title 13 Public Services Chapter 13.16 Storm and Surface Water Management *City of Olympia (codepublishing.com)* 13.16.017 Drainage Design and Erosion Control Manual – Adopted 2022 *https://www.codepublishing.com/WA/Olympia/?Olympia13/Olympia1316.html#13.16.017* 2021 Engineering Design and Development Standards Chapter 5 Stormwater, Effective February 9, 2022 *https://www.codepublishing.com/WA/Olympia/?edds/OlympiaEDDS05.html#5.010* To meet the requirements of the 2019 Permit, modifications were made to Olympia's Drainage Design and Erosion Control Manual. This enforceable ordinance and manual meet the equivalent to the Stormwater Management Manuals for Western Washington by Ecology. Olympia will continue the implementation of existing programs as required in S5.C.6.

b. The ordinance or other enforceable mechanism shall include the Minimum Requirements, thresholds, and definitions in Appendix 1…	The City of Olympia updated the Drainage Design and Erosion Control Manual effective November 28, 2022. This is the enforceable mechanism that includes at a minimum:
	
	• The minimum requirements, thresholds, and definitions in Appendix 1 for new development, redevelopment, and construction sites.
	• Requirements that include the following limitations and criteria that, when used to implement the minimum requirements in Appendix 1 will protect water quality, reduce the discharge of pollutants to the Maximum Extent Practicable (MEP), and satisfy the State requirement under Chapter 90.48 RCW to apply AKART prior to discharge:
	  ○ Site planning requirements
	  ○ BMP selection criteria
	  ○ BMP design criteria
	  ○ BMP infeasibility criteria
	  ○ LID competing needs criteria
	  ○ BMP limitations
	• Legal authority through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities, approved under the provisions of this section that discharge to the Permittee's MS4.
	
	Drainage Design and Erosion Control Manual (olympiawa.gov)

Permit Requirements	Planned and Ongoing Activities
c. The program shall include a permitting process with site plan review, inspection and enforcement capability to meet the standards listed in (i) through (iv) below, for both private and public projects, using qualified personnel…	Planning, Building, Engineering, and Water Resources Lines of Business work together to ensure compliance with permitting, site plan review, inspection, and enforcement capabilities. This includes ongoing meetings of an interdepartmental workgroup, plan review, work by building inspectors, a TESC inspector and documentation in the City's permit tracking database. At a minimum, this program is applied to all sites that meet the minimum thresholds adopted pursuant to S5.C.6.b.i, above. • Review of all stormwater site plans for proposed development activities. • Inspect all construction sites that meet the minimum thresholds. • Inspect all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. Enforce as necessary based on the inspection. • Inspect all stormwater and flow control BMPs/facilities, and catch basins, in new residential developments every six months, until 90% of the lots are constructed (or when construction has stopped and the site is fully stabilized), to identify maintenance needs and enforce compliance with the maintenance standards as needed. • Inspect all permitted development sites upon completion of construction and prior to final approval or occupancy, to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities. Enforce as necessary based on the inspection. • Compliance with the inspection requirements, above, is determined by the presence and records of an established inspection program designed to inspect all sites. Compliance during this permit term is determined by achieving at least 80% of required inspections. These inspections may be combined with other inspections, provided they are performed using qualified personnel. • The program includes a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notice of violations, and other enforcement records. Records of maintenance inspections and maintenance activities are maintained. • An enforcement strategy is implemented to respond to issues of non-compliance.
d. The program shall make available, as applicable, the link to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity and, as applicable, a link to the electronic Industrial Stormwater General Permit NOI form for industrial activity to representatives of proposed new development and redevelopment.	This requirement is covered in the SmartGov community permitting portal. *https://ci-olympia-wa.smartgovcommunity.com/Public/DocumentsView/Download/653c57fe-b4ea-4d6d-a5e9-aa02015e9800*

Permit Requirements	Planned and Ongoing Activities
e. Each Permittee shall ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from the new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections and enforcement, are trained…	Staff with primary job duties implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections and enforcement have received training through means of Certified Erosion Sediment Control Lead (CESCL), Low Impact Development (LID), on the job training, and other ongoing training activities. Staff positions with these primary job duties include the following: • Current Planners • Plans Examiners • Building and Engineering Inspectors • Code Enforcement • Stormwater Engineer • Construction Stormwater Inspector

Operations and Maintenance (S5.C7.)

Table 7 summarizes the requirements of Permit Special Condition S5.C7. and outlines the corresponding activities.

Table 7. Operations and Maintenance

Permit Requirements	Planned and Ongoing Activities
Implement and document a program to regulate maintenance activities and to conduct maintenance activities by the Permittee to prevent or reduce stormwater impacts. ***Minimum performance measures:***	The purpose of the maintenance standard is to determine if maintenance is required. The maintenance standard is not a measure of the facility's required condition at all times between inspections. Exceeding the maintenance standard between inspections and/or maintenance activities is not a permit violation. Unless there are circumstances beyond Olympia's control, when an inspection identifies an exceedance of the maintenance standard, maintenance shall be performed: • Within 1 year for typical maintenance of facilities, except catch basins. • Within 6 months for catch basins. • Within 2 years for maintenance that requires capital construction of less than $25,000. Circumstances beyond Olympia's control include denial or delay of access by property owners, denial or delay of necessary permit approvals, and unexpected reallocation of maintenance staff to perform emergency work.
a. Implement maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington. For facilities which do not have maintenance standard the Permittee shall develop a maintenance standard. No later than June 30, 2022, the Permittees shall update their maintenance standards as necessary to meet the requirements of this section.	The Stormwater Utility currently inspects and maintains all catch basins on a two-year cycle. Every catch basin is cleaned during the time of inspection. Any structural issues are recorded and issued a work order for maintenance within six months.
b. Maintenance of stormwater facilities regulated by the Permittee • *The program shall include provisions to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S.5.C.6.c and shall be maintained in accordance with S5.C.7.a*	The Utility operates a stormwater facility inspection program for multi-family residential, commercial, and HOAs. The Utility provides a resources page for property owners to meet inspection and maintenance requirements, including a free online stormwater facility inspection and maintenance training *course* for property owners, contractors and property managers. *Private Stormwater System Maintenance (olympiawa.gov)* Maintenance agreements that clearly identify the party responsible for maintenance in accordance with the maintenance standards established under S5.C.7.a, requires inspection of facilities in accordance with the requirements below, and establishes enforcement procedures. These agreements are filed and recorded with the Thurston County Auditor. Annual inspections of all stormwater treatment and flow control BMPS/facilities that discharge to the MS4 and were permitted by Olympia according to S5.C.6.c, including those permitted in accordance with requirements adopted pursuant to the 2007-2019 Ecology municipal stormwater permits.

Permit Requirements	Planned and Ongoing Activities
• *Compliance with the inspection requirements in (b), above, shall be determined by the presence and records of an established inspection program designed to inspect all facilities, and achieving at least 80% of required inspections*	The City has required maintenance agreements since the late 1980's, though not all agreements have been recorded. For parcels without a recorded agreement, the City also requires inspection and maintenance of facilities in accordance with the Drainage Manual so facilities function as designed. The code reference is OMC 13.16.170 Stormwater facility maintenance. *https://www.codepublishing.com/WA/Olympia/?Olympia13/Olympia1316.html#13.16.170* The program inspects 100% of facilities adopted pursuant to the 2007-2024 Ecology municipal stormwater permits annually.
• *The program shall include a procedure for keeping records of inspections and enforcement actions by staff…*	The program keeps records of inspections, technical assistance, and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records.
c. Maintenance of stormwater facilities owned and operated by the Permittee. • *Each Permittee shall implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control BMPS/facilities and taking appropriate maintenance actions in accordance with the adopted maintenance standards.* • *Each Permittee shall spot check potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events (24 hour storm event with a 10 year or greater recurrence interval.)* • *Each Permittee shall inspect all catch basins and inlets owned or operated by the Permittee every two years. Clean catch basins if the inspection indicates cleaning is needed…* • *The catch basin inspection schedule of every two years may be changed as appropriate to meet the maintenance standards based on maintenance records of double the length of time of the proposed inspection frequency.* • *Compliance with the inspection requirements above, shall be determined by the presence of an established inspection program achieving at least 95% of required inspections.*	The Vegetation & Habitat Operations and Stormwater/Wastewater Operations work groups operate programs to inspect and maintain all City of Olympia stormwater facilities. Stormwater and treatment flow control BMPs/facilities receive annual inspections and maintenance in accordance with maintenance standards defined in the adopted Olympia Drainage Design and Erosion Control Manual. The body of this work is documented and recorded using ArcGIS ESRI Field Maps technology and work order management systems (currently CityWorks). An important mission of the Utility is to provide public and environmental safety through reduced flooding potential. A "hot spots" list and inventory of potentially vulnerable stormwater infrastructure receives inspection and maintenance during most rain events. This list and inventory are cataloged and maintained using ArcGIS mapping. Spot checks for potentially damaged stormwater treatment and flow control BMPs/facilities occurs during and after all major storm events required after a 24-hour storm event with a 10 year or greater recurrence interval. Spot checks frequently occur after many lower-intensity storms than is required by the permit. The Utility currently inspects and maintains all catch basins on a two-year cycle. Every catch basin receives cleaning maintenance at the time of inspection. The body of this work is documented and recorded using ArcGIS ESRI Field Maps technology and a work order management system. Analyzing catch basin inspection and cleaning records spanning from 2015-2022, City staff utilized ArcGIS to identify a more efficient approach to examining and maintaining catch basins. Based on this analysis, an updated route protocol and ground-truthing pilot could enhance the catch basin inspection schedule, potentially increasing staff capacity. The freed-up resources could then be redirected towards addressing other essential infrastructure maintenance needs. The Utility continues to remain in compliance with inspection requirements.

Permit Requirements	Planned and Ongoing Activities
d. Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. *No later than December 31, 2022, document the practices, policies, and procedures.*	Practices and policies to reduce stormwater impacts from all lands owned or maintained by the City are routinely implemented across City operations, including the categories listed below. Collecting and documenting these procedures was completed by December 31, 2022. Ongoing documentation of activities will be completed as procedures change. The Utility maintains documentation of practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by City of Olympia. Activities addressed: • Pipe cleaning • Cleaning of culverts that convey stormwater in ditch systems • Ditch maintenance • Street cleaning • Road repair and resurfacing, including pavement grinding • Snow and ice control • Utility installation • Pavement striping maintenance • Maintaining roadside areas, including vegetation management • Dust control • Application of fertilizers, pesticides, and herbicides • Sediment and erosion control • Landscape maintenance and vegetation disposal • Trash and recycling waste removal • Trash, graffiti, and pet/human waste management • Exterior building cleaning and maintenance • Equipment Maintenance
e. Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality.	Operations and maintenance field staff have received training addressing the importance of protecting water quality, operation and maintenance standards, inspection procedures, relevant SWPPPs, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. All maintenance leads have completed Certified Erosion and Sediment Control Lead (CESCL) training. An abbreviated Erosion Control Plan is used for ground disturbing work when affecting more than 100 square feet of earth and any saw cutting or ditching activities occur.

Permit Requirements	Planned and Ongoing Activities
f. Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards… *As necessary, update SWPPPs no later than December 31, 2022*	The City of Olympia's Maintenance Center and Squaxin Park Maintenance Facility have site specific SWPPPs which receive monthly site inspections. Corrective actions are taken when an inspection identifies a violation of the SPPP standards. These SWPPPs are updated on an as-needed basis, to reflect current city operations and conditions. At a minimum, these SWPPPS include: • A detailed description of the operational and structural BMPs in use at each facility and a schedule for implementation of additional BMPs when needed. • Annual inspections of the facility, including visual observations of discharges, to evaluate the effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed. The results of these inspections must be documented in an inspection report or checklist. • An inventory of the materials and equipment stored on site, and the activities conducted at the facility, which may be exposed to precipitation or runoff and could result in stormwater pollution. • A site map showing the facility's stormwater drainage, discharge points, and areas of potential pollutant exposure. • A plan for preventing and responding to spills at the facility which could result in an illicit discharge.
g. Maintain records of the activities conducted to meet the requirements of this section.	Records are collected and maintained on site in a SWPPP site binder as well as electronically for all employees to access.

Source Control Program for Existing Development (S5.C8.)

Table 8 summarizes the requirements of Permit Special Condition S5.C8. and outlines the corresponding activities.

Table 8. Source Control Program for Existing Development

Permit Requirements	Planned and Ongoing Activities
Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4.	City of Olympia staff have developed a Business Source Control program with a focus on pollution prevention. The program requires the following: • Application of operational source control BMPs, and if necessary, structural source control BMPS or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities. • Inspections of pollutant generating sources at publicly and privately owned institutional, commercial, and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4. • Application and enforcement of local ordinances at sites, identified pursuant to S5.C.8.b.ii, including sites with discharges authorized by a separate NPDES permit. • Practices to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers from the sites identified in the inventory. City staff currently co-facilitate the regional Business Inspection Group (BIG) in collaboration with the Washington Storm Center. This group receives participation by more than fifty municipalities in Washington State. The Business Inspection Program Report was published in January 2020. *BIG (Business Inspection Group) – Washington Stormwater Center (wastormwatercenter.org)* BIG secured $280k in funding from the Stormwater Action Monitoring Effectiveness studies to develop the *Source Control Inspection Program Guidance Manual – Washington Stormwater Center (wastormwatercenter.org)*. This eight-chapter manual was completed in December 2022. Training to municipalities throughout Western Washington was also completed in December 2022. Olympia inspection staff attended these in person trainings in late 2022 and early 2023.
b. Minimum performance measures: *i. No later than August 1, 2022, permittees shall adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.*	A team of staff reviewed Olympia's municipal code Chapter 13.16 Storm and Surface Water Management in preparation of meeting this permit requirement. As a result, the code was updated to include the following new sections: OMC 13.16.010 T. Definitions for "Source Control BMP" OMC 13.16.015 Water quality standards. OMC 13.16.045 Pollution prevention requirements. OMC 13.16.175 Conflicts

Permit Requirements	Planned and Ongoing Activities
ii. No later than August 1, 2022, the Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. *iii. No later than January 1, 2023, Permittees shall implement and inspection program for sites identified pursuant to S5.C.8.b.ii, above.* *iv. No later than January 1, 2023, each Permittee shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period…* *v. Permittees shall train staff who are responsible for implementing the source control program to conduct these activities.*	Staff developed an inventory using business licenses obtained through the Department of Revenue and City business licenses applying the North American Industry Classification System (NAICS) codes as required by the municipal stormwater permit Appendix 8. Other environmental considerations, including proximity to critical resources and presence of hazardous materials, were also used to develop the list. The inventory includes: • Businesses and/or sites identified based on the presence of activities that are pollutant generating. • Other pollutant generating sources, based on complaint response, such as home-based businesses and multi-family sites. The inspection program for sites identified pursuant to S5.C.8.b.ii, above include: • All identified sites with a business address shall be provided information about activities that may generate pollutants and the source control requirements applicable to those activities. • Annual inspections equal to 20% of the businesses and/or sites listed in the source control inventory to assess BMP effectiveness and compliance with source control requirements. Follow-up compliance inspections at the same site may count toward the 20% inspection rate. • Inspection of 100% of sites identified through credible complaints. • Inspections based on complaints, or when the property owner denies entry, may be included for 20% inspection rate. Implementation of a progressive enforcement policy requiring sites to comply with stormwater requirements within a reasonable time period includes: • If determined, through inspections or otherwise, that a site has failed to adequately implement required BMPs, Olympia shall take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections. • When determined that a site has failed to adequately implement BMPs after a follow-up inspection(s), Olympia shall take enforcement action as established through authority in OMC 13.16, or through the judicial system. • Records, including documentation of each site visit, inspection report, warning letters, notices of violations, and other enforcement records, demonstrating an effort to bring sites into compliance will be maintained. Records of sites that are not inspected because the property owner denies entry will also be maintained. • Non-emergency violations of OMC 13.16 may be referred to Ecology. *Business Pollution Prevention - City of Olympia* An online e-training curriculum covering the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures was developed by Washington Stormwater Center technical advisory committee, which included representation by Olympia Staff. This free online resource was launched in April 2023, providing necessary training for municipal inspection staff. *Source Control Inspection Online Training (thinkific.com)*

Compliance with Total Maximum Daily Load (TMDLs) Requirements (S7.)

Table 9 summarizes the requirements of Permit section S7. Compliance with TMDLs and outlines the corresponding activities.

Table 9. Compliance with TMDLs

Permit Requirements	Planned and Ongoing Activities
The following requirements apply if an applicable TMDL is approved for stormwater discharges from MS4s owned or operated by the Permittee. *A. For applicable TMDLs listed in Appendix 2, affected Permittees shall comply with the specific requirements identified in Appendix 2. Each Permittee shall keep records of all actions …* *B. For applicable TMDLs not listed in Appendix 2, compliance with this Permit shall constitute compliance with those TMDLs.*	The City of Olympia S7. Compliance with TMDLs Program will implement this section by: A. Olympia has kept and continues to keep records of all actions required by this Permit that are relevant to applicable TMDLs within their jurisdiction. The status of the TMDL implementation shall be included as part of the Annual Report submitted to Ecology. Each Annual Report shall include a summary of relevant SWMP, and Appendix 2 activities conducted in the TMDL area to address the applicable TMDL parameter(s). See Specific Actions below for a summary of actions. B. For applicable TMDLs not listed in Appendix 2, compliance with this Permit shall constitute compliance with those TMDLs. See Specific Actions below for a summary of actions.
Specific Actions	
WRIA 13 – Henderson Inlet Watershed Fecal Coliform Bacteria Water Quality Improvement Project *1. Annually implement the following BMPs in areas discharging to the Henderson Inlet via the MS4 in accordance with S5.C.6 of the Western Washington Phase II Permit:* • *Require phosphorus control for new and redevelopment projects that discharge via MS4 to Woodard Creek and meet the project thresholds in Appendix 1, MR #6: Runoff Treatment of the Western Washington Phase II Permit.* *2. Revise the City's coordinated plan with the City of Lacey to monitor and reduce fecal coliform bacteria discharges from the Fones/Taylor wetland treatment facilities by December 31, 2019 in accordance with S5.C.5 Illicit Discharge and Elimination of the Western Washington Phase II Permit.*	Through site plan review and permitting, development occurring within the Woodard Creek basin requires phosphorus control water quality treatment. It should be recognized that the TMDL study was conducted prior to the construction of the Fones Road Ditch Stormwater Facility by the Cities of Olympia and Lacey in 2004. This joint facility consists of an upper facility (Lacey's) that flows to a lower facility (Olympia's). Lacey's stormwater facility is located North of 14th Avenue east of Fones Road in Olympia and consists of a two-cell treatment/infiltration pond to treat Lacey's stormwater originating from South Sound Center, portions of Pacific Avenue, and residential areas south of Pacific Avenue, prior to flowing into a stormwater conveyance under Fones Road to combine with Olympia's Stormwater System. The combined discharge flows to Olympia's stormwater facility that is located behind Home Depot on Fones Road and consists of two ponds; an upper wet pond, and a large lower pond that was designed as an infiltration pond. The facility has a very large capacity, with discharges to Woodard Creek occurring after major storm events.

Permit Requirements	Planned and Ongoing Activities
• *Submit a revised program plan to Ecology that includes a timeline for implementation, sampling frequencies, and identifies, at the minimum, who will be responsible for sampling, investigations, and enforcement by December 31, 2019.* • *If sampling results indicate potential illicit discharges, conduct an investigation in accordance with S5.C.5. of the Western Washington Phase II Permit* • *Submit a summary of the coordinated efforts with sampling, investigation and enforcement actions taken with each annual report.*	The Water Quality Implementation Plan for the Henderson Inlet TMDL (Hempleman, 2008) identified two main actions for the headwater of Woodard Creek: stormwater treatment for the Taylor wetland stormwater discharge, and monitoring discharge, if any, for bacteria. In Table 7 of the Implementation Plan, the stormwater facility is noted as being constructed, and implementation status was "completed." The discharge monitoring for bacteria was first coordinated between the Cities of Lacey and Olympia in 2013. Since then, there have been two revisions to this plan, with the latest occurring on December 30, 2019. Compliance with the plan continues annually through coordinated sampling efforts. During 2022, the third-party lab identified in the coordinated monitoring plan ceased operation. In 2023, representatives from the Cities of Olympia and Lacey held discussions with Ecology TMDL and Permit writing teams to outline necessary actions for staying compliant with the existing coordinated monitoring plan as well as potential changes for the 2024-2029 NPDES Permit. A summary of coordinated sampling efforts and results are submitted with the Annual NPDES Report. Though not directly related to the TMDL, the City of Olympia and LOTT Clean Water Alliance currently have a limited term interlocal agreement to help fund wastewater pumping of occupied RV's throughout LOTTs service area. The City has been working diligently to ensure protection of surface waters in areas with individuals living in RVs that drain to our MS4 or receiving waters.
WRIA 13 – Deschutes River Watershed *Annually report on temperature reduction measures in the watershed.*	The City of Olympia met this requirement through the following actions: • Applying the City's Drainage Design and Erosion Control Manual (DDECM) for new and redevelopment, including the DDESM's low impact development (LID) requirements. • City of Olympia's code and Engineering Development and Design Standards (EDDS) limits the amount of impervious (hard) surfaces and promotes the use of LID approaches. • Implementing the City's Shoreline Master Program and Critical Area Ordinance which requires stream buffers for new development. • Stewardship activities through Water Resources Habitat Program and Parks, Arts and Recreation program, where tree planting and restoration activities take place in critical areas which buffer wetlands and streams.

Monitoring and Assessment (S8.)

Table 10 summarizes the requirements of Permit section S8. Monitoring and Assessment and outlines the corresponding activities for the Program.

Table 10. Monitoring and Assessment

Permit Requirements	Planned and Ongoing Activities
A. Regional Status and Trends Monitoring *B. Stormwater Management Program Effectiveness and Source Identification Studies*	City of Olympia selected option A for compliance with Phase I Permit requirement S8. Monitoring and Assessment due no later than December 1, 2019. Options chosen: • **Regional Status and Trends Monitoring** - Option #a. (S8.A.2.a) *a. Make annual payments into a collective fund to implement regional receiving water status and trends monitoring of small streams and marine nearshore areas in Puget Sound. The annual payments into the collective fund are due on or before August 15 each year beginning in 2020. Submit payments according to Section S8.D.* • **Stormwater Management Program Effectiveness and Source Identification Studies –** Option # a. (S8.B.2.a) *a. Make annual payments into a collective fund to implement effectiveness and source identification studies. The annual payments into the collective fund are due on or before August 15 each year beginning in 2020. Submit payments according to Section S8.D.* The City of Olympia participates in a collective Stormwater Action Monitoring (SAM) program to implement the above programs. These studies help provide more detailed water quality analysis and can be helpful in identifying effective pollution prevention and treatment strategies and tools based on land use and intensity analogs in other urban watersheds. *Stormwater Action Monitoring - Washington State Department of Ecology*

Reporting Requirements (S9.)

Table 11 summarizes the requirements of this Permit section and outlines the corresponding activities.

Table 11. Reporting Requirements

Permit Requirements	Planned and Ongoing Activities
A. *No later than March 31 of each year, each Permittee shall submit an Annual Report. The* *reporting period for the Annual Report will be the previous calendar year unless otherwise specified.*	Please find the current *City of Olympia's Annual Report* at Water Plans, Regulations & Reports: State regulations – Western Washington Phase II Municipal Stormwater Permit - *https://www.olympiawa.gov/services/water_resources/water_plans,_regulations___reports/index.php*

Conclusion and Contact Information

The 2024 SWMP Plan describes the actions and activities that Olympia plans to implement over the coming year to manage stormwater and protect the land and waterscapes it affects. Central to that effort is internal coordination among all Olympia departments and lines of business, subject to Permit requirements. This coordination mechanism successfully engages staff across the organization, minimizing barriers to achieving Permit compliance.

Olympia is committed to implementing the programs described herein and recognizes that doing so contributes to two very important objectives:

1. Protection of Olympia's waters and lands so its community members can enjoy them safely today and for generations to come; and,
2. Compliance with the City's NPDES Phase II Municipal Stormwater Permit.

The SWMP Plan is a living document that will be updated continually as circumstances change. The SWMP plan will be updated annually throughout the Permit term to reflect changes in the City's approach to stormwater management and Permit compliance. Olympia will continue to invite the public to participate in decision-making processes regarding the City's SWMP. For more information on participation opportunities, see Table 3 - Public Involvement and Participation (S5.C3.) of this plan.

Questions about the City's SWMP should be directed to:

Jeremy Graham
NPDES Coordinator
Phone 360.753.8097
Email *jgraham@ci.olympia.wa.us*

Western WA Municipal Stormwater Permit (olympiawa.gov)

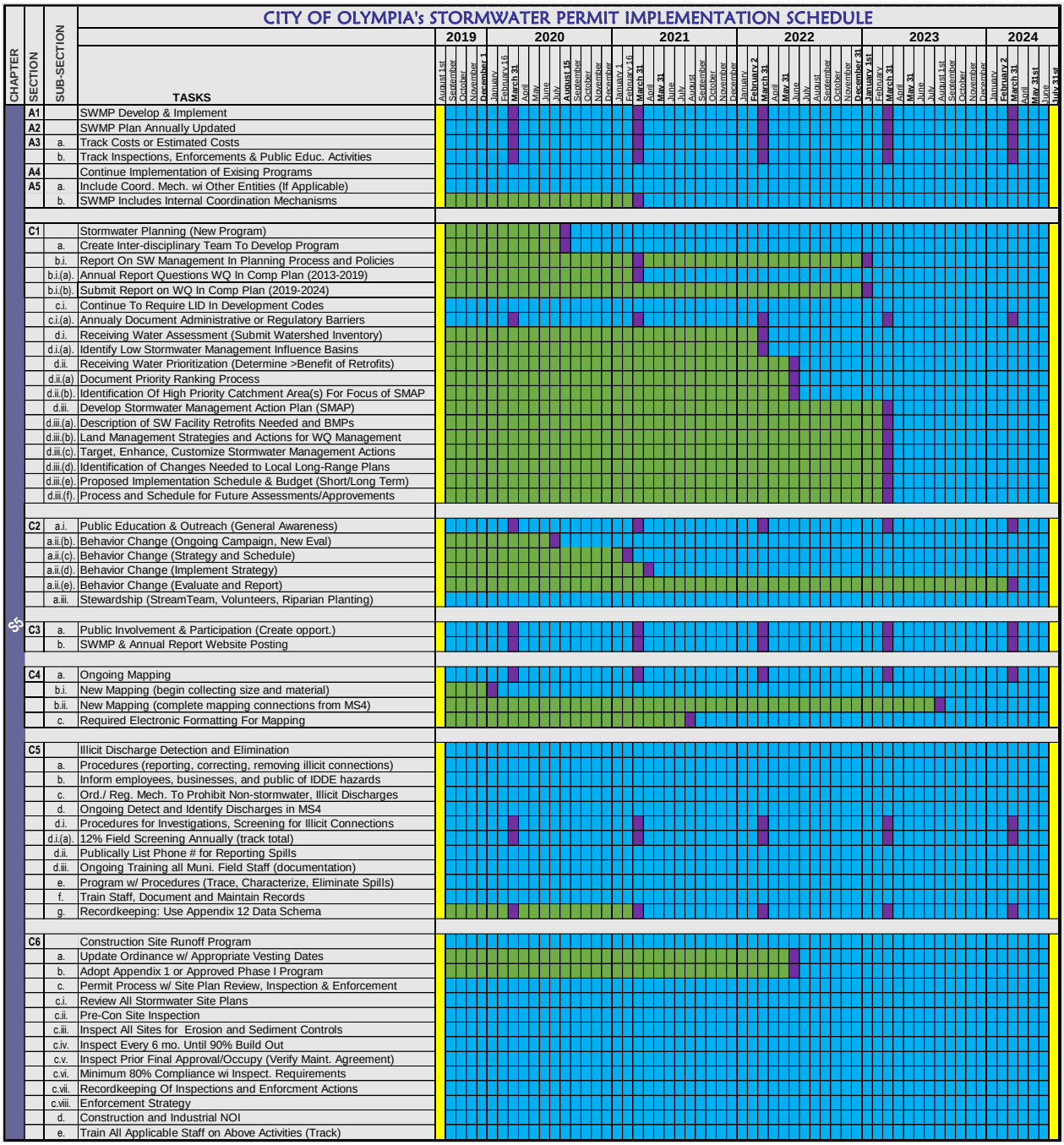
https://www.olympiawa.gov/services/water_resources/water_plans,_regulations___reports/western_wa_municipal_stormwater_permit.php

Glossary

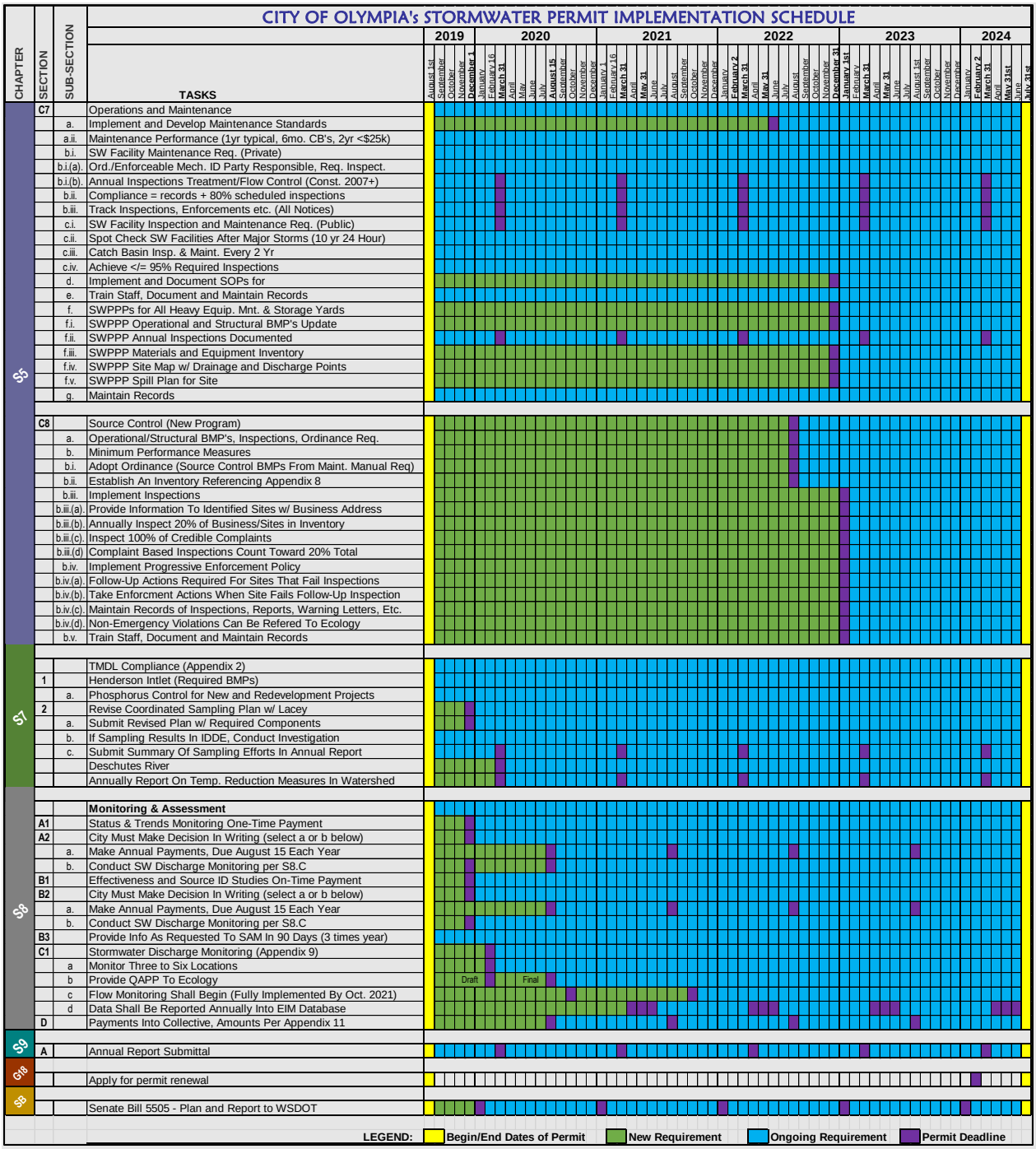
Glossary Term	Definition
All known, available and reasonable methods of prevention, control and treatment (AKART)	All known, available, and reasonable methods of prevention, control and treatment. See also State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW. Refers to the State Water Pollution Control Act, chapter 90.48.010 RCW and chapter 90.48.520 RCW.
Best Management Practices (BMP)	The schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by Ecology that, when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to waters of Washington State.
Business Inspection Group (BIG)	A regional business inspection group that meets via Web-Ex to share information and collaborate on topics surrounding source control business inspections and new permit requirements.
Illicit discharge	Any discharge to a MS4 that is not composed entirely of stormwater or of non-stormwater discharges allowed as specified in this permit (S5.C.3 and S6.D.3).
Illicit Discharge Detection and Elimination (IDDE)	An ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.
Maximum Extent Practicable (MEP)	Refers to paragraph 402(p)(3)(B)(iii) of the federal Clean Water Act which reads as follows: "Permits for discharges from municipal storm sewers shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques, and system, design, and engineering methods, and other such provisions as the Administrator or the State determines appropriate for the control of such pollutants."
Municipal Separate Storm Sewer System (MS4)	A conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels or storm drains): (i) Owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of Washington State. (ii) Designed or used for collecting or conveying stormwater. (iii) Which is not a combined sewer; (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.; and (v) Which is defined as "large" or "medium" or "small" or otherwise designated by Ecology pursuant to 40 CFR 122.26.
Secure Access Washington (SAW)	A central login that lets you access the online services of multiple state agencies. A server provided by Washington's Consolidated Technology Services.

Stormwater Action Monitoring (SAM)	A collaborative, Western Washington regional stormwater monitoring program that is funded by more than 90 cities and counties, the ports of Seattle and Tacoma, and the Washington State Department of Transportation under the general municipal stormwater permits.
Stormwater Management Action Plan	The document required by Ecology to assess and complete a receiving water assessment and prioritization of at least one priority catchment area located within the City's jurisdiction.
Stormwater Management Program (SWMP)	A set of actions and activities designed to reduce the discharge of pollutants from the MS4 to the MEP and to protect water quality, and comprising the components listed in S5 (for cities, towns, and counties) or S6 (for Secondary Permittees) of this Permit and any additional actions necessary to meet the requirements of applicable TMDLs pursuant to S7 *Compliance with TMDL Requirements,* and S8 *Monitoring and Assessment*.
Stormwater Treatment and Flow Control BMPs/Facilities	Detention facilities, permanent treatment BMPs/facilities; and bioretention, vegetated roofs, and permeable pavements that help meet Appendix 1 Minimum Requirements #6 (treatment), #7 (flow control), or both.
Stormwater Work Group (SWG)	Group who prioritizes and selects stormwater-related studies and monitoring activities and oversees SAM.
Total Maximum Daily Load (TMDL	A water cleanup plan. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still meet water quality standards, and an allocation of that amount to the pollutant's sources. A TMDL is the sum of the allowable loads of a single pollutant from all contributing point and nonpoint sources. The calculation must include a margin of safety to ensure that the water body can be used for the purposes the state has designated. The calculation must also account for seasonable variation in water quality. Water quality standards are set by states, territories, and tribes. They identify the uses for each water body, for example, drinking water supply, contact recreation (swimming), and aquatic life support (fishing), and the scientific criteria to support that use. The Clean Water Act, section 303, establishes the water quality standards and TMDL programs.
WQWebIDDE	Short for water quality website illicit discharge detection and elimination, is the name given to Ecology's database for municipalities to submit spill/incident reporting and response data. The WQwebIDDE's database platform is located online in Ecology's WQwebPortal, hosted through Secure Access Washington (SAW).

Appendix A
Permit Task Requirements and Schedules



Continued…


CITY OF OLYMPIA's STORMWATER PERMIT IMPLEMENTATION SCHEDULE
CHAPTER
SECTION
SUB-SECTION
TASKS
2019
2020
2021
2022
2023
2024
August 1st
September
October
November
December 1
January
February 16
March 31
April
May
June
July
August 15
September
October
November
December 1
January
February 16
March 31
April
May 31
June
July
August
September
October
November
December
January
February 2
March 31
April
May 31
June
July
August
September
October
November
December 31
January 1st
February
March 31
April
May 31
June
July
August 1st
September
October
November
December
January
February 2
March 31
April
May 31st
June
July 31st
S5
C7 Operations and Maintenance
a. Implement and Develop Maintenance Standards
a.ii. Maintenance Performance (1yr typical, 6mo. CB's, 2yr <$25k)
b.i. SW Facility Maintenance Req. (Private)
b.i.(a). Ord./Enforceable Mech. ID Party Responsible, Req. Inspect.
b.i.(b). Annual Inspections Treatment/Flow Control (Const. 2007+)
b.ii. Compliance = records + 80% scheduled inspections
b.iii. Track Inspections, Enforcements etc. (All Notices)
c.i. SW Facility Inspection and Maintenance Req. (Public)
c.ii. Spot Check SW Facilities After Major Storms (10 yr 24 Hour)
c.iii. Catch Basin Insp. & Maint. Every 2 Yr
c.iv. Achieve </= 95% Required Inspections
d. Implement and Document SOPs for
e. Train Staff, Document and Maintain Records
f. SWPPPs for All Heavy Equip. Mnt. & Storage Yards
f.i. SWPPP Operational and Structural BMP's Update
f.ii. SWPPP Annual Inspections Documented
f.iii. SWPPP Materials and Equipment Inventory
f.iv. SWPPP Site Map w/ Drainage and Discharge Points
f.v. SWPPP Spill Plan for Site
g. Maintain Records
C8 Source Control (New Program)
a. Operational/Structural BMP's, Inspections, Ordinance Req.
b. Minimum Performance Measures
b.i. Adopt Ordinance (Source Control BMPs From Maint. Manual Req)
b.ii. Establish An Inventory Referencing Appendix 8
b.iii. Implement Inspections
b.iii.(a). Provide Information To Identified Sites w/ Business Address
b.iii.(b). Annually Inspect 20% of Business/Sites in Inventory
b.iii.(c). Inspect 100% of Credible Complaints
b.iii.(d) Complaint Based Inspections Count Toward 20% Total
b.iv. Implement Progressive Enforcement Policy
b.iv.(a). Follow-Up Actions Required For Sites That Fail Inspections
b.iv.(b). Take Enforcment Actions When Site Fails Follow-Up Inspection
b.iv.(c). Maintain Records of Inspections, Reports, Warning Letters, Etc.
b.iv.(d). Non-Emergency Violations Can Be Refered To Ecology
b.v. Train Staff, Document and Maintain Records
S7
TMDL Compliance (Appendix 2)
1 Henderson Intlet (Required BMPs)
a. Phosphorus Control for New and Redevelopment Projects
2 Revise Coordinated Sampling Plan w/ Lacey
a. Submit Revised Plan w/ Required Components
b. If Sampling Results In IDDE, Conduct Investigation
c. Submit Summary Of Sampling Efforts In Annual Report
Deschutes River
Annually Report On Temp. Reduction Measures In Watershed
S8
Monitoring & Assessment
A1 Status & Trends Monitoring One-Time Payment
A2 City Must Make Decision In Writing (select a or b below)
a. Make Annual Payments, Due August 15 Each Year
b. Conduct SW Discharge Monitoring per S8.C
B1 Effectiveness and Source ID Studies On-Time Payment
B2 City Must Make Decision In Writing (select a or b below)
a. Make Annual Payments, Due August 15 Each Year
b. Conduct SW Discharge Monitoring per S8.C
B3 Provide Info As Requested To SAM In 90 Days (3 times year)
C1 Stormwater Discharge Monitoring (Appendix 9)
a Monitor Three to Six Locations
b Provide QAPP To Ecology
Draft
Final
c Flow Monitoring Shall Begin (Fully Implemented By Oct. 2021)
d Data Shall Be Reported Annually Into EIM Database
D Payments Into Collective, Amounts Per Appendix 11
S9
A Annual Report Submittal
G18
Apply for permit renewal
S8
Senate Bill 5505 - Plan and Report to WSDOT
LEGEND:
Begin/End Dates of Permit
New Requirement
Ongoing Requirement
Permit Deadline

Appendix B
Underground Injection Control Program

Ecology has added requirements for Underground Injection Control (UIC) wells. This appendix lays out the reference material for installation, maintenance & operation, education & outreach, illicit discharge & elimination, and annual reporting of changes.

Permit Requirements	Planned and Ongoing Activities
S2.A.1 Discharges to groundwaters of the State through facilities regulated under the Underground Injection Control (UIC) program, Chapter 173-218 WAC, are not authorized under this permit.	The Underground Injection Control Program (UIC) administered by WA Ecology protects groundwater quality by regulating discharges to UIC wells. UIC wells are fabricated structures used to discharge fluids into the subsurface. Examples are drywells, infiltration trenches with perforated pipe, and any structure deeper than the widest surface dimension (see Reference 6 or Chapter I-4 UIC Program in the 2019 Stormwater Management Manual for Western Washington (SWMMWW) 2019SWMMWW (wa.gov). For single family projects, drywells that are located immediately adjacent to buildings and infiltrate roof runoff directly from the gutters and downspouts do not need Ecology registration. Open ponds are not considered injection wells. Olympia uses the presumptive approach to meet UIC Program rule authorization as allowed by Ecology. The City has a single jurisdiction wide Stormwater Management Program (SWMP) that combines requirements for both the municipal UIC wells and the municipal separate storm sewer system (MS4). City of Olympia Drainage Design and Erosion Control Manual requires permit applicants to provide proof of UIC registration if it is required by Ecology prior to plan approval or permit issuance (see Volume I Section I-2.14 pg 35 and I-4 pp 90-106). The City of Olympia Design Manual is an equivalent to the SWMMWW. Note that existing UIC wells that are unable to obtain Ecology rule authorization and UIC site ID number without modification may require design review and permit approval per City of Olympia requirements for such. See *Drainage Design and Erosion Control Manual (olympiawa.gov)* for a program description that addresses UIC well registration.