City of Olympia
2025 Stormwater Management Program Plan
DRAFT


2024 Calendar Cover

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Introduction

Purpose of the Stormwater Management Program Plan (SWMP Plan)

Since 2007, Stormwater runoff flowing through Olympia's catch basins, pipes, ponds, and ditches is managed according to the requirements of the *Western Washington Phase II Municipal Stormwater Permit (Permit).* The Permit requires the City to take actions such as educating the public and encouraging non-polluting behaviors, respond to spills, look for illegal dumping and cross-connections, enforce erosion and sediment control at construction sites, ensure inspections and maintenance of public and private stormwater infrastructure and use best practices for land management and development.

This Stormwater Management Program Plan (SWMP Plan) is designed to reduce the discharge of pollutants from Olympia's regulated municipal separate storm sewer system (MS4) 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.

The SWMP Plan is required to be updated annually as a condition of the Permit. It outlines the actions that the City proposes to take in 2025, and highlights accomplishments completed in 2024 to meet Permit requirements. Another purpose of this document is to inform the Olympia community about the work the City is doing and to provide an opportunity to give feedback on this work.

Coordination & Timing

The City of Olympia currently operates under the 2024-2029 Phase II Municipal Stormwater Permit. The Permit was re-issued July 1, 2024 and became effective August 1, 2024. This is the fourth generation of the Permit. In Washington State, EPA delegates administration of municipal stormwater permits to the Department of Ecology (Ecology). In addition, Ecology-issued permits also apply regulations under the State Water Pollution Control Act (Chapter 90.48 RCW).

The City's Storm and Surface Water Utility (Utility) in the Public Works Department holds the primary responsibility for developing and implementing the City's stormwater management programs and tracking Permit requirements. However, compliance with the Permit requires internal coordination and documentation of activities across several City work groups and departments. In 2025, Utility staff will coordinate City-wide efforts to ensure that current and planned activities meet Permit requirements. Compliance activities include efforts carried out by Public Works, Information Technology, Community Planning & Economic Development and Climate Program, Parks, Arts & Recreation, and the City Manager's Office (including City Attorney), Strategic Communications, Finance, Fire, and Police Departments.

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

Olympia Storm and Surface Water Utility Activities

The Utility maintains over 166 miles of underground drainage pipe, over 7,700 storm drains, and 433 stormwater treatment and flow control facilities which carry stormwater runoff from roads, parking lots and rooftops to our streams and Budd Inlet. We work on many levels to prevent flooding, protect water quality and restore aquatic habitat. This involves working closely with residents, businesses, and other government agencies to maintain a safe and healthy environment for people, pets and wildlife.

Relationship with Other Plans and Activities

The 2018 Storm and Surface Water Plan (Plan) guides Storm and Surface Water Utility work. The Plan was adopted on April 10, 2018, by the Olympia City Council and is updated every 5-10 years. 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 coordinated by the Utility across the City organization specifically governed by the Permit. Although not directly required by the Permit, Olympia's extensive habitat restoration efforts further our stormwater management goals.

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 of how the City of Olympia is meeting those requirements on the right column. Permit requirements are shared between multiple divisions 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 such as water quality management tools to protect receiving waters. *a. Each Permittee shall continue to convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.*	City of Olympia has created *interdisciplinary teams* which include staff from Parks, Community Planning and Development, Climate Program, Transportation, Operations and Maintenance, and Waste Resources. The teams work together to inform and assist in the development strategies and actions to carry out the programmatic elements of the Permit and the goals and objectives of the Storm and Surface Water Plan and City's Comprehensive Plan. Teams meet on an ongoing basis: • Engineering and Planning and Environmental Services (E2) • City Coordination • Stormwater Operations Problem Solving team (STOPS) • City-wide Long-Range Planning
b. Coordination with long-range plan updates.	Ongoing work is done to integrate Permit-related planning with existing short and long-range plans and to incorporate stormwater management goals into future planning processes and documents. This helps us determine how stormwater management needs and protection and improvement of receiving water health are (or are not) informing planning processes and influencing policies and implementation strategies in Olympia. Plans reviewed or updated include the following: • *Comprehensive Plan Updates* • *Parks, Arts & Recreation Plan* • *Transportation Master Plan* • *Wastewater Management Plan* • *Water System Plan* • *Waste Resources Management Plan* • *Capital Facilities Plan* • *Storm and Surface Water Plan*

Permit Requirements	Planned and Ongoing Activities
c. Low impact development code-related requirements. i. *Permittees shall continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.* *The intent shall be to make LID the preferred and commonly used approach to site development. The local development-related codes, rules, standards, or other enforceable documents shall be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations, where feasible.* (a) *Annually, each Permittee shall assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated in accordance with the 2013 Permit, and the measures developed to address the barriers. If applicable, the report shall describe mechanisms adopted to encourage or require implementation of LID principles or LID BMPs.*	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. • *12.02* • *16.48* • *16.60* • *17.20* • *18.02* • *18.04* • *18.06* • *18.36* • *18.38* • *18.64*
d. Stormwater Management Action Planning i. *Complete and submit a SMAP for at least one new high priority catchment area, or additional actions for existing SMAP. .Due no later than March 31, 2027.*	Olympia has assessed conditions and criteria related to our local receiving waters and surrounding contributing areas to identify which receiving waters would benefit from stormwater management planning. Based on this analysis a catchment within the Indian Creek basin was chosen for development of a Stormwater Management Action Plan (SMAP) in 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, include: • Prioritization of Source Control inspections (ongoing) • O&M inspections or enhanced maintenance (ongoing) • Public Education and Outreach behavior change programs (ongoing) • Habitat enhancement and restoration (ongoing) In 2025, staff will reassess to determine one new high priority catchment area in addition to Indian Creek catchment. The assessment will include a public involvement strategy inviting the community to engage and provide input into the selection process.

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 encourage 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 natural environment 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. 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 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 35 years and is known as Stream Team of Thurston County. The partnership is formally acknowledged in a five-year (2025-2029) 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 promote watershed stewardship events and activities and actions for clean water.
The minimum performance measures: *a. Each Permittee shall implement an education and outreach program. The program design shall be based on local or regional water quality information and priority audience characteristics to identify high priority audiences, subject areas, and BMPs. Based on the priority audience's demographic, the Permittee shall consider delivering its selected messages in language(s) other than English, as appropriate to the priority audience.* i. ***General awareness.*** *To build general awareness, Permittees shall annually select at a minimum one target audience and one subject area either (a) or (b):*	In 2024, Olympia and REEP partners deepened and expanded their partnership with CIELO, a community support organization dedicated to promoting community, self-sufficiency, and leadership among Latinos in the South Puget Sound region. REEP Partners collaborated with CIELO staff to co-create three events aimed at educating attendees about aquatic habitats and species, salmon recovery 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. Additionally, REEP Partners supported CEILO's Dia De La Familia and Las Posadas events by sponsoring Stream Team outreach tables and providing translation at the events. The 2025 REEP Workplan dedicates staff time and resources to continue collaboration with CIELO and to co-create events for 2025. Each year Olympia engages in the Puget Sound Starts Here Month campaign. Olympia advised and contributed financially to the regional Don't Wait to Inflate digital media campaign. The 2024 campaign focused on reducing tire wear particles and 6PPD-Q. Olympia zip codes alone had over 53,000 YouTube impressions with 1379 click throughs

	and over 52,500 digital media impressions .Videos and social media posts were viewed in English, Spanish, Korean and Vietnamese. 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, near shore habitat ecosystems and teacher training. Additionally, Olympia sponsors the Water Resources Stewardship Through Art calendar contest and street sweeper decal contest for middle-school students. The City's Street Sweeping webpage was updated in 2024, including the *Enhanced Street Sweeping Storymap* with interactive web map application showing the last six dates when any street has been swept. In 2024, Olympia expanded Stormwater Week to include Washington and Marshall Middle Schools reaching 558, 6-8 grade students. The students took pre and post curriculum surveys. Student responses showed a significant increase in understanding of Stormwater Week topics and the actions they can take to protect Olympia's waterways.
a) Priority Audiences: General public (including overburdened communities, or school age children, college/university, or trade students) or businesses (including home-based and mobile businesses). Subject areas: • *General impacts of stormwater on surface waters, including impacts from impervious surfaces.* • *Low impact development (LID) principles and LID BMPs.* *b) Priority Audiences: Engineers, contractors, developers, property owners/managers or land use planners. Subject areas:* • *Technical standards for stormwater site erosion control plans.* • *LID principles and LID BMPs.* • *Source control BMPs for building materials to reduce pollution to stormwater, including but not limited to stormwater pollution from PCB-containing materials.* *c) Permittees shall provide subject area information to target audience on an ongoing or strategic schedule.* *ii. **Behavior change**. To affect behavior change, permittees shall select, at a minimum, one target audience and one BMP.* *a) Priority Audiences: Residents, landscapers, property managers/owners, developers, school age children, college/university, trade students or businesses (including home-based or mobile businesses).*	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, reporting spills and stormwater pollution prevention best practices are specifically addressed. Staff continued work with regional partners to prioritize diversity, equity, and inclusion in our outreach and engagement programs. Following a one-day facilitated equity retreat, staff worked with a consultant to develop the 2025-2027 Equity Action Plan. In 2024, we continued our efforts to transcreate materials into Spanish. This effort included translating 12 Kids Activity Sheets focused on stewardship and stormwater pollution prevention, developing a career flyer and Save our Salmon worksheets. The REEP 2025 Workplan allocates staff time and resources to continue collaboration with CIELO, to transcreate additional materials and to increase Stream Team website accessibility. Additionally, the partners will expand on a collaboration with the Hands On Children's Museum begun in late 2024. The partnership will allow both entities to expand audience reach, prioritize equity and promote watershed stewardship awareness and actions. Yauger Park Interpretive Project was completed in September of 2024. This project uses interpretive elements to communicate how Yauger Park Regional Stormwater Complex [YPRSC] benefits the surrounding community and life downstream. Information focuses on the park being designed to flood and treat polluted runoff. The elements include 5 small signs (13''x 24") with information about stormwater facility features and actions for clean water, a 36" x 42" intro sign and five 4' metal salmon sculptures on 8' poles which draw park visitors to the stormwater park and informative signs. The project also includes multimedia content, narrated video with drone fly over, QR codes leading to City webpages and a blog post.

b) Social marketing campaign development. Based on the recommendation from 2024 evaluation and report, no later than July 1, 2025, each Permittee shall follow social marketing practices and methods and develop a campaign that is tailored to the community, including development of a program evaluation plan. Each Permittee shall: *1. Develop a strategy and schedule to implement the existing campaign more effectively; or* *2. Develop a strategy and schedule to expand the existing campaign to a new priority audience or BMPs; or* *3. Develop a strategy and schedule for a new priority audience and BMP behavior change campaign.* *c) Behavior change campaign implementation. No later than September 1, 2025, begin to implement the strategy developed in S5.C.2.a.ii.(b).* *d) Behavior change campaign evaluation. No later than March 31, 2029, evaluate and submit report on:* *1. The changes in understanding and adoption of behaviors resulting from the implementation of the strategy; and* *2. Any planned or recommended changes to the campaign to be more effective; describe the strategies and process to achieve the results.* e) *Behavior change campaign adaptive management. Permittees shall use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program.*	To meet 2019-2024 permit requirements, the City of Olympia implemented the *Dumpster Lid Social Marketing Campaign*. Mid-way through 2024, the campaign transitioned from education and outreach staff to Source Control staff to implement the materials and messaging of the campaign. Materials 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 site visits prompts and BMP outreach materials are given to businesses. Additionally, staff place stickers and signs in dumpster areas reminding employees to keep dumpster lids closed. Throughout the dumpster campaign education and outreach staff coordinated with Olympia's Waste Resources Department. Through site visits, staff occasionally identified dumpsters with missing lids and/or missing plugs and were able to coordinate to resolve issues immediately. A final evaluation report was completed by March 31, 2024. This report documented significant changes in understanding and adoption of behaviors related to keeping dumpster lids closed and recommended changes to the campaign to increase its effectiveness in the future. In 2025 we will continue our Dumpster Campaign coordinating with Source Control staff to prioritize businesses in the Indian Creek Basin (SMAP area). However, for our primary Social Marketing Campaign we will develop a strategy and schedule for a new priority audience and BMP behavior change campaign focused on Adopt A Drain. We will develop a strategy and schedule to implement the new campaign no later than July 1st and begin implementing the campaign by September 1st.
*iii. **Stewardship.** Each Permittee shall provide, partner with or promote stewardship opportunities to encourage residents or businesses to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and watershed habitat improvement. Permittees may provide, partner with, or promote stewardship opportunities created or organized by existing organizations (including non-Permittees).*	Water Resources continues to partner with Parks, Arts & Recreation and Steam Team 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. Each Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP and SMAP.	The Stormwater Management Program Plan (SWMP Plan) and National Pollutant Discharge Elimination System (NPDES) Annual Report are discussed, reviewed, and amended through a 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. Permittees shall document specific outreach measures for overburdened communities.* i. *Annually, document specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities.* ii. *No later than December 31, 2026, document methods used to identify overburdened communities*	In 2025 City staff will continue to participate 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 will continue to communicate with the City's Diversity and Equity committee coordinator for ideas and feedback in our efforts to develop stormwater programs, especially in the development of the SMAP prioritization. In 2025 staff will coordinate with University of Washington GIS cohort to update datasets for the Olympia and Thurston County Equity Index. This Equity Index is used to inform outreach and engagement planning and SMAP 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 REEP programs. A few public involvement strategies are anticipated for the City's SMAP and SWMP Plan in 2025: • In April staff will present the 2025 SWMP Plan to the Olympia Rotary Club. • In the spring of 2025 staff will begin working with the City's Strategic Communications team to develop a public involvement strategy for the 2026 SWMP Plan including SMAP • In the summer of 2025 staff will meet with tribal representatives to discuss SMAP basin prioritization and solicit input for the 2027 SWMP Plan. • In October of 2025 staff will present the SWMP Plan to the Watershed Resource Inventory Area 13 (WRIA 13) Salmon Habitat Recovery Lead Entity and ask for feedback on aspects of the plan. Staff will specifically be asking for input on our basin prioritization (SMAP) selection. • In October of 2025 staff will present the Draft 2026 SWMP Plan to the UAC and ask for input.

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. All other submittals shall be available to the public upon request.	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.* *i. Known MS4 outfalls and known MS4 discharge points.* *(a) Map outfall size and material, where known.* *ii. Receiving waters, other than groundwater.* *iii. Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.* *iv. Geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters.* *v. Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. Including tributary conveyance type, material, and size where known and associated drainage areas and land us* *vi. Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities.* *vii. All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.* *viii. All known connections from the MS4 to a privately owned stormwater system*	The City has mapped tributary conveyances to, and including, all known outfalls and discharge points within the City of Olympia. Ongoing mapping continues within the City of Olympia to improve spatial data coverage and data quality. The City also performs storm pipe 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.

Permit Requirements	Planned and Ongoing Activities
b. New Mapping. *ix. No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known.* *x. No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Permittees shall develop and follow a methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed.* *xi. No later than March 31, 2028, implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee. Submit with the March 31, 2028 Annual Report a map(s) (pdf) and table (.xlsx) with a breakdown of the MS4 tributary basins quantifying estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.* *No later than December 31, 2028, using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.*	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. The City of Olympia completed a Tree Canopy Assessment in 2023 following standard protocol recommended by the US Forest Service – Urban & Community Forestry Program. The assessment includes an analysis of tree canopy percent cover based on a variety of geographies, such as stream basin, census block group, and land use designation. This assessment will be used to develop an Urban Forest Management Plan by 2026 to establish tree canopy goals and strategies to manage the urban forest to support stormwater management, among other citywide objectives. In 2025 staff will coordinate with University of Washington GIS student cohort to update datasets for the Olympia Equity Index. The Equity Index is an interactive mapping tool which: • Uses spatial data sets to display levels of burden across the city by census block. • Includes 5 metrics that form the Index framework. • Includes 21 indicator datasets aligned with the framework metrics The Equity Index will be used to map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.
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 required in S5.C.4.a through c, above. *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 prohibit, 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 prohibit, 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. The program shall also include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4. *Illicit connections and illicit discharges shall be identified through, but not limited to, field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections, and/or monitoring information, as appropriate.*	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, Public Works E-News 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 ordinance or other regulatory mechanism in effect as of the effective date of this Permit shall be revised, if necessary, to meet the requirements of this Section no later than July 1, 2027.	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: *i. 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. The Permittee shall implement a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns. Screening for illicit connections may be conducted using Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2020), or another methodology of comparable or improved effectiveness. The Permittee shall document the field screening methodology in the Annual Report.* *(a) All Permittees shall complete field screening for an average of 12% of the MS4 each year.* *ii. A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.* iii. *An ongoing training program for all municipal field staff who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, 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 shall be provided, as needed, to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of the trainings provided and the staff trained.*	Each year the Stormwater Utility continues its Pipe Conveyance CCTV Inspection Program using GraniteNet software to condition rate and locate storm sewer pipe ds, illicit discharges, and cross-connections. GraniteNet collects data under the rules of the National Association of Sewer Service Companies (NASSCO) in the Pipeline Assessment Certification Program (PACP). The Utility screens an average of 35 percent of the MS4 each year. Screening includes inspections of conveyance pipes, catch basins, maintenance holes, and stormwater treatment facilities, and flow control devices. The calculation is based on inspection totals for pipe length and asset count data collected from various database management systems. GraniteNet is used for conveyance pipes and Esri's Field Maps Applicator is used for catch basins, maintenance holes, treatment facilities, and flow control devices. MS4 screening includes condition reports and work order asset tracking through CityWorks software. During 2025, staff will begin rescreening 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. Additionally, staff promote spill reporting throughout our *5 Things* utility Bill Inserts, on our Public Works E-newsletters and on our Stream Team publications and on social media. 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. In 2025 Olympia field staff met with Ecology Spill Preparedness and Response team to discuss their technical assistance program and answer staff questions as part of our ongoing staff training. City staff are planning an IDDE training in Fall 2025 for field staff. This training will encompass an overview of permit requirements, as well as existing and updated procedures for both field and office staff.

Permit Requirements	Planned and Ongoing Activities
e. Each Permittee shall implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4. *i. Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee. Procedures shall address the evaluation of whether the discharge must be immediately contained and steps to be taken for containment of the discharge.* *ii. Procedures for the post-emergency clean-up of firefighting activities:* *iii. No later than December 31, 2026, the Permittee shall coordinate with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when PFAS-containing AFFFs are used during emergency firefighting activities.* *(a) No later than January 1, 2027, the Permittee shall update and implement procedures to minimize discharges to the MS4 during post- emergency clean-up and disposal activities including, but not limited to, the immediate clean-up in all situations where PFAS-containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4. The Permittee is not expected to deploy control measures during an emergency.*	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 the 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. ○ 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 requirements 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.

Permit Requirements	Planned and Ongoing Activities
	On January 14, 2025, key staff met with the Ecology Spill Prevention and Response team to discuss how Ecology and Olympia manage illicit discharges and the multiple ways Ecology can be used as a resource for illicit discharges in Olympia limits. The next training of all municipal field staff is scheduled to begin in Fall 2025 to provide an overview of illicit discharge identification, spill prevention, and incident reporting, as well as new and revised procedures.
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 13 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.* *b. No later than June 30, 2027, each Permittee shall adopt and make effective a local program, that meets the requirements of S5.C.6.b(i) through (iii), below, and shall apply to all applications submitted.* *c. The ordinance or other enforceable mechanism shall include, at a minimum:* *i. The Minimum Requirements, thresholds, and definitions in Appendix 1, or the 2019 Appendix 1 amended to include the changes identified in Appendix 10, or Phase I program approved by Ecology and amended to include Appendix 10, for new development, redevelopment, and construction sites. Adjustment and exceptions criteria equivalent to those in Appendix 1 shall be included. More stringent requirements may be used, and/or certain requirements may be tailored to local circumstances through the use of Ecology-approved basin plans or other similar water quality and quantity planning efforts. Such local requirements and thresholds shall provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1.* *ii. The local requirements shall include the following requirements, limitations, and criteria that, when used to implement the minimum requirements in Appendix 1 (or program approved by Ecology under the 2024 Phase I Permit), will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the State requirement under Chapter 90.48 RCW to apply AKART prior to discharge.*	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.

Permittees shall document how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the state AKART requirements.	
iv. The 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.	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)

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 Divisions 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, prior to clearing and construction, all permitted development sites 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 with no less than 4 months between inspections, 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 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 annually. 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 to representatives of proposed new development and redevelopment, 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, and a link to the online registration requirements for Underground Injection Control (UIC) wells. *Permittees shall continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.*	This requirement is covered in the SmartGov community permitting portal. *https://ci-olympia-wa.smartgovcommunity.com/Public/DocumentsView/Download/653c57fe-b4ea-4d6d-a5e9-aa02015e9800* *https://ci-olympia-wa.smartgovcommunity.com/Public/DocumentsView*
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

Stormwater Management for Existing Development (S5.C7.)

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

Table 7 - Stormwater Management for Existing Development

Permit Requirements	Planned and Ongoing Activities
Each Permittee shall implement a Program to control or reduce stormwater discharges to waters of the State from areas of existing development. The Program shall aim to focus on strategic stormwater investments over longer planning timeframes.	Stormwater Management for Existing Development (S5.C7.) is an added element to the 2024-2029 Permit. This section aligns with the City's Stormwater Management Action Plan (SMAP) that adopts a planning approach that emphasizes improvements to receiving water quality and habitat under both existing and anticipated future developed conditions. The purpose is to focus on strategic stormwater investments aimed at preventing water quality degradation and/or improving conditions in receiving waters harmed by past development.

The minimum performance measures: *a. Permittees shall implement stormwater facility retrofits, or tailored SWMP actions that meet the criteria described in Appendix 12, using one or a combination of the following:* *i. Strategic stormwater investments identified in Stormwater Management Action Plan(s) (SMAPs, S5.C.1.d.), or similar stormwater planning process; and/or* *ii. Opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.*	Stormwater investments are focused on retrofits to reduce stormwater discharges to waters of the state from areas of existing development. Either identified through the SMAP process within the prioritized basin(s) or as an opportunistic investment outside of SMAP area(s) to improve stormwater management and infrastructure. In addition to structural stormwater retrofits such as Low Impact Development (LID), flow control or treatment facilities efforts may include focused, enhanced, or customized implementation of stormwater management actions *within SMAPS*: • Focused or more frequent IDDE field screening • Prioritization of Source Control inspections • O&M inspections or enhanced maintenance of facilities you own or operate • Maintenance that requires capital construction of more than $25,000 • Public Education and Outreach behavior change programs to support SMAP actions for the receiving water overall, or for the catchment area in particular. Opportunistic stormwater investments include structural retrofits and non-structural project types, implemented *outside of SMAPs*, that Permittees may implement to receive credit toward managed acres: • Flow control or treatment facilities • Maintenance with capital construction costs ≥ $25,000 (limited credit) • Property Acquisition for Water Quality and/or Flow Control Benefits (limited credit) • Restoration of Riparian Buffers (limited credit) • Restoration of Forest Cover (limited credit) • Permanent Removal of Impervious Surfaces (limited credit) • Enhanced Sweeping and Line Cleaning (limited credit)
b. With each Annual Report, provide a list of planned, individual projects scheduled for funding or implementation during this Permit term. *c. No later than March 31,2028 Permittees shall fully fund, start construction or completely implement project(s) that meet the assigned equivalent acreage and submit documentation with the Annual Report as described in Appendix 12.*	Olympia is required to fully find, start construction or completely implement LID, flow control or treatment BMP projects and management actions that meet the assigned equivalent of 9 managed acres. Annually Olympia will submit a list of planned projects scheduled for funding or implementation that meet the criteria described in Appendix 12. Current planned opportunistic stormwater projects include: • Green Stormwater Retrofit at Rogers and Hays is on Ecology's Draft Funding Offer list eligible for $759,220. • Brawne Avenue Stormwater Retrofit Project became fully funded in FY 2024 with the award of a grant from the Department of Ecology. The total cost of the project is estimated at $495,295.29 and the grant award is up to $421,001.00. The project is scheduled for construction in 2025.

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. The program shall include application of source control BMPs, inspections, and enforcement. *Minimum performance measures:* *a. Permittees shall enforce ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.* *Permittees shall update and make effective the ordinance(s), or other enforceable documents, as necessary to meet the requirements of this Section no later than August 1, 2027.* b. *Permittees shall implement a program to identify publicly and privately owned institutional, commercial and industrial sites which have the potential to generate pollutants to the MS4. Permittees shall update the inventory at least once every 5 years.* *i. Businesses and/or sites identified based on the presence of activities that are pollutant generating (refer to Appendix 8); and* *ii. Other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites.* *c. Permittees shall implement an inspection program, performed by qualified personnel, for sites identified pursuant to S5.C.8.a..i. above.* i. *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. This information shall be provided by mail, telephone, electronic communications, or in person. This information may be provided all at one time or spread out over the Permit term to allow for tailoring and distribution of the information during site inspections.*	City of Olympia staff launched the Source Control Program in 2023 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. In the latter half of 2025, staff plan to review and update the current business inventory list. This will follow the Permit 5-year cycle and will provide an opportunity to remove businesses that have closed and add new businesses that have opened. Site specific historical data will be retained for future reference. With the implementation of the new inventory, all sites will receive letters providing information about the Source Control Program, information about potential pollution generating activities, the BMPs applicable to those activities, and a link to the City's webpage with additional resources and information.

ii. *The Permittee shall annually complete the number of inspections equal to 20% of the businesses and/or sites listed in their source control inventory to assess BMP effectiveness and compliance with source control requirements. The Permittee may count follow-up compliance inspections at the same site toward the 20% inspection rate. The Permittee may select which sites to inspect each year and is not required to inspect 100% of sites over a 5-year period. Sites may be prioritized for inspection based on their land use category, potential for pollution generation, proximity to receiving waters, or to address an identified pollution problem within a specific geographic area or sub-basin.* iii. *Each Permittee shall inspect 100% of sites identified through credible complaints.* iv. *Permittees may count inspections conducted based on complaints, or when the property owner denies entry, to the 20% inspection rate.* v. *Annual Reporting of inspections shall be organized by business type or activities with potential to generate pollutants to the MS4.* d. *Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as specified below:* i. *If the Permittee determines, through inspections or otherwise, that a site has failed to adequately implement required BMPs, the Permittee shall take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections.* ii. *When a Permittee determines that a site has failed to adequately implement BMPs after a follow-up inspection(s) the Permittee shall take enforcement action as established through authority in its municipal codes or ordinances, or through the judicial system.* iii. *Each Permittee shall maintain records, including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records demonstrating an effort to bring sites into compliance. Each Permittee shall also maintain records of sites that are not inspected because the property owner denies entry.*	In 2024 staff inspected 175 businesses equaling 20% of the current inventory. None of the sites required enforcement protocol. The number of inspections in 2025 is anticipated to be the same. At the end of 2024, staff utilized funds from the Capacity Grant to purchase 30 5-gallon universal spill kits to provide to businesses on the source control inventory during inspections. In 2025, staff will distribute spill kits to businesses on a priority basis. In 2025 staff will distribute a regionally adopted spill plan form to businesses that do not have a current spill plan for their site. In 2025 staff will develop a strategy to inform businesses operators and owners of commercial, industrial and multi-story residential buildings constructed between 1950-1979 of building wash down restrictions. We will provide information regarding the identification and assessment of building materials with the potential to contain PCBs and building wash down Source Control BMPs to eliminate PCBs from entering the M4. Through the assistance of an intern, staff created 69 informational fact sheets for Source Control BMPs outlined in the Olympia Drainage Design and Erosion Control Manual (DDECM). In 2025, these fact sheets will be made available to business operators and property owners during source control inspections. Additionally, staff updated the format of the site inspection form in 2024 to better align with the priorities of the Source Control Program.

iv. *A Permittee may refer non-emergency violations of local ordinances to Ecology, provided, the Permittee also makes a documented effort of progressive enforcement. At a minimum, a Permittee's enforcement effort shall include documentation of inspections and warning letters or notices of violation.* v. *Application and enforcement of local ordinances at sites identified pursuant to S5.C.8.a.i., including sites with discharges authorized by a separate NPDES permit.* e. *Permittees shall train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases and enforcement procedures. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staff. Permittees shall document and maintain records of the training provided and staff trained.*	In the fall of 2024, Source Control staff attended an in-person Source Control Training hosted by the Washington Stormwater Center and presented by CWT Training Academy. 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 provides necessary training for municipal inspection staff. Source Control inspection staff annually complete this training as a refresher. City staff initiated the regional Business Inspection Group (BIG) in collaboration with the Washington Storm Center. The Business Inspection Program Report co-developed by Olympia staff was published in January 2020. Staff continue to collaborate regionally and participate in BIG meetings. Meetings often introduce speaker trainings and information such as lessons learned and best practices for implementing a successful Source Control Program.

Operations and Maintenance (S5.C9.)

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

Table 9 - 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:*** *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, or a Phase I program approved by Ecology. For facilities which do not have a maintenance standard the Permittee shall develop a maintenance standard. No later than June 30, 2027, the Permittees shall update their maintenance standards as necessary to meet the requirements of this section.* *i. 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 is not a Permit violation.* *ii. Unless there are circumstances beyond the Permittee'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 the Permittee's control include denial or delay of access by property owners, denial or delay of necessary Permit approvals, and unexpected reallocations of maintenance staff to perform emergency work. For each exceedance of the required timeframe, the Permittee shall document the circumstances and how they were beyond their control.*	In 2025, City of Olympia Operations and Maintenance staff plan to meet all Permit requirements through various programs and activities aimed at: • Inspecting, cleaning, and documenting defects of approximately half of the city's catch basins. • Continuing to perform it's street sweeping program with the use of two sweepers covering planned routes that cover arterials, connectors, and neighborhood streets in an effort to improve stormwater quality • Expanding ditch maintenance through the use of a new ditch inspection program. Using a newly developed inspection collection tool to create a full inventory of city ditches and document their condition and need for maintenance. • Cleaning/restoring city owned/maintained storm ponds that have been identified through inspections. • Replacing filter cartridges in stormwater treatment facilities that have been identified as needing replacement. • Responding to service requests where a spill has been reported to provide any cleaning, protections of the MS4, documenting with an inspection and reporting to proper authorities. • Performing needed repairs of stormwater facilities that have been identified as defective through service requests, structure inspections, pipeline CCTV inspections, or engineering or special group directives that have created work orders to direct and document the work.
b. Maintenance of stormwater facilities regulated by the Permittee i. *The program shall include provisions to verify adequate long-term O&M of stormwater treatment and flow control*	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

BMPs/facilities that are permitted and constructed pursuant to S.5.C.6.c and shall be maintained in accordance with S5.C.9.a. *The provisions shall include:* (a) *Implementation of an ordinance or other enforceable mechanism that:* • *Clearly identifies the party responsible for maintenance in accordance with maintenance standards established under S5.C.9.a.* • *Requires inspection of facilities in accordance with the requirements in (b), below.* • *Establishes enforcement procedures.* (b) *Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the Permittee according to S5.C.6.c, including those permitted in accordance with requirements adopted pursuant to the 2007-2024 Ecology municipal stormwater permits, unless there are maintenance records to justify a different frequency. Inspections shall be conducted by qualified personnel or a qualified third party.* *Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – Certification and Signature.* ii. *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 annually.* iii. *The program shall include a procedure for keeping records of inspections and enforcement actions by staff, qualified personnel, and qualified third parties, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.*	inspection and maintenance training *course* for property owners, property managers and contractors. *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 2007-2024 Ecology municipal stormwater permits. 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 keeps records of inspections, technical assistance, and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. In 2025, Olympia staff plan to discuss options for development of GIS based program inspections and record management system to increase overall efficiency of the program. In 2025 staff will implement an updated facility maintenance inspection form used by property owners, property management, and contractors. The form will streamline processes for inspectors and property owners, managers and contractors.
c. Maintenance of stormwater facilities owned and operated by the Permittee. i. *Each Permittee shall implement a program to annually inspect all municipally owned or operated stormwater treatment and*	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

flow control BMPS/facilities and taking appropriate maintenance actions in accordance with the adopted maintenance standards. ii. *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.) If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control BMPs/facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.* iii. *Each Permittee shall continue to 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…* *(a) 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.* *(b) Inspections every two years may be conducted on a "circuit basis" whereby 25% of catch basins and inlets within each circuit are inspected to identify maintenance needs. Include an inspection of the catch basin immediately upstream of any MS4 outfall, discharge point, or connections to public or private storm systems, if applicable. Clean all catch basins within a given circuit for which the inspection indicates cleaning is needed to comply with maintenance standards established under S5.C.9.a, above.* *(c) The Permittee may clean all pipes, ditches, and catch basins and inlets within a circuit once during the Permit term. Circuits selected for this alternative must drain to a single point.* iv. *Compliance with the inspection requirements above, shall be determined by the presence of an established inspection program achieving at least 95% of required inspections.*	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 are expected to be redirected toward addressing other permit requirements and essential infrastructure maintenance needs. An updated route protocol and ground-truthing pilot is expected to be initiated in 2025. The Utility continues to remain in compliance with inspection requirements.

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, 2027, document the practices, policies, and procedures.* *xv. Building exterior cleaning and maintenance.* *(a) For Permittee-owned buildings built or renovated between 1950- 1980, update policies, practices, or procedures to include Source Control BMPs to minimize PCBs from entering the MS4. Permittees shall not discharge washdown water to the MS4 if the building is confirmed or suspected to have PCB-containing materials.* *xvi. Preparing Permittee-owned buildings for renovation or demolition.* *(b) Update policies, practices, or procedures to include Source Control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.* *e. No later than July 1, 2027, develop and implement a municipal street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality*	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
f. Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the Industrial Stormwater General Permit or another NPDES permit that authorizes stormwater discharges associated with the activity. SWPPS shall include the following information: *i. A detailed description of the operational and structural BMPs in use at the facility and a schedule for implementation of additional BMPs when needed. BMPs selected shall be consistent with the Stormwater Management Manual for Western Washington, or a Phase I program approved by Ecology. The SWPPP shall be updated as needed to maintain relevancy with the facility.*	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 SWPPP standards. Both SWPPPs will be reviewed and updated in 2025 to reflect current city operations and conditions and new procedures pertaining to Source Control BMPs to minimize PCBs from entering the MS4. 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.

ii. At minimum, 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 shall be documented in an inspection report or check list. *iii. 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.* *iv. A site map showing the facility's stormwater drainage, discharge points, and areas of potential pollutant exposure.* *v. A plan for preventing and responding to spills at the facility which could result in an illicit discharge.* *g. Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality.*	• 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. Records are collected and maintained on site in a SWPPP site binder as well as electronically for all employees to access. 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. 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.

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

Table 10 summarizes the requirements of Permit section S7. Compliance with TMDLs and outlines the corresponding activities.

Table 10 - 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:* *a. 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. Continue to communicate with the City of Lacey to monitor and reduce fecal coliform bacteria discharges from the Fones/Taylor wetland treatment facilities by December 31, 2024 in accordance with S5.C.5 Illicit Discharge Detection and Elimination of the Western Washington Phase II Permit.* *a. Continue fecal coliform sampling. The sampling program shall require at least one sampling event during the wet season (November through April) in each of Year 1 and Year 3 of the permit cycle. The sampling program shall also require specific*	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
sampling locations, sampling protocols, parameters, analytical methods, and timelines for implementation. *b. If sampling results indicate potential illicit discharges, conduct an investigation in accordance with S5.C.5 of the Western Washington Phase II Permit.* *c. Submit a summary of 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 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 in December of 2024. 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. These changes are reflected in the left had column. A summary of coordinated sampling efforts and results are submitted with the Annual NPDES Report. The Cities of Lacey and Olympia updated their coordinating sampling plan to reflect new permit requirements in 2024. The City of Olympia will continue to monitor the precipitation to sample at least once during the 2024-2025 wet season.
WRIA 13 – Deschutes River Watershed *Annually report on temperature reduction measures in the watershed.*	The City of Olympia meets 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.
WRIA 13- Budd Inlet Dissolved Oxygen *Actions required:* • No later than March 31, 2025, annually report on municipal stormwater BMPs implemented (in addition to those already	In 2024 with the delivery of Olympia's second high-efficiency regenerative air sweeper, the City was able to fully implement its enhanced street sweeping program. Olympia's enhanced street sweeping program is a recognized water quality best management practice (BMP). It targets areas with high potential to improve water quality in

Permit Requirements	Planned and Ongoing Activities
required by S5 of the permit) since the effective date of this permit (August 1, 2024) to help control nutrients for areas discharging to Budd Inlet via the MS4. • No later than December 31, 2027, begin using existing data to conduct spatial analysis of nutrient loading from the MS4. This analysis shall consider land use sources of nutrients, existing municipally owned/operated BMPs, and privately owned BMPs regulated by the Permit that provide management of nutrients, and which drain to and are discharged from the MS4. • No later than August 1, 2028, develop and implement priority BMPs to minimize the transport of nutrients via the MS4. • Designate areas discharging via the MS4 to Budd Inlet as high priority areas for illicit discharge detection and elimination. Complete IDDE screening for nutrient sources in 100% of these areas by July 31, 2029, and implement the schedules and activities identified in S5.C.5 of the Western Washington Phase II Permit in response to any illicit discharges found. • • For the actions described above, prioritize work and implementation actions within areas identified as priorities by the TMDL that are within the applicable jurisdiction, including East Bay Drive, West Bay Drive and Deschutes Parkway, tributaries draining directly to Budd Inlet, with extra emphasis on Schneider Creek, Ellis Creek, Mission Creek, Moxlie Creek, Percival Creek, Black Lake, and Black Lake Ditch.	receiving waters: high use roadways, curbed streets, canopy cover, and road sections with no stormwater runoff treatment. The goal of enhanced street sweeping is to collect sediment and associated pollutants before reaching the municipal separate stormwater system (MS4) and receiving water bodies. Unlike standard broom street sweeping, enhanced methods use regenerative air technology to pick up smaller particles, including fine sediment that not only includes pollutants but also includes significant nutrient loads. Removing organic debris from streets prevents nutrients, such as phosphorus and nitrogen from entering waterways through natural decomposition. View Olympia's *Enhanced Street Sweeping Program Story Map* In 2024 staff collaborated with Thurston County, Tumwater, and Lacey to identify land use coefficients that we could use for a spatial analysis of nutrient loading from the MS4. We agreed on using Ecology's Western Washington NPDES Phase I Stormwater Permit Final S8.D Data Characterization 2009-2013 outfall data. Here's a *link* to the referenced table in *Appendix I – Contaminate Loads*. For our purposes we will use Table I-2. Statistical summary of contaminant mass loads (kg) by parameter and land use, and Table I-5. Statistical summary of contaminant load per area (kg ha-1) by parameter and land use. In 2025 staff will develop a strategy to conduct a spatial analysis that includes land use sources of nutrients, municipally owned/operated BMPs, and privately owned BMPs that provide management of nutrients, and which drain to and are discharged from the MS4 to Budd Inlet. We anticipate the analysis will be completed in 2026. The analysis will inform the designation of high priority areas and prioritize implementation of IDDE screening and BMPs to minimize the transport of nutrients from these areas. Requirements of the TMDL will be emphasized as a weighted criteria in the SMAP prioritization process as well as the Stormwater Management for Existing Development (SMED) prioritization of stormwater investments in stormwater retrofit projects and non-structural project types.

Monitoring and Assessment (S8.)

Table 11 summarizes the requirements of Permit section S8. Monitoring and Assessment and outlines the corresponding activities for the Program.

Table 11 - 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 was due December 1, 2024.

Reporting Requirements (S9.)

Table 12 summarizes the requirements of this Permit section and outlines the corresponding activities.

Table 12 - 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_utilities/water_plans,_regulations___reports/index.php*

Conclusion and Contact Information

The 2025 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 divisions, subject to Permit requirements. This coordination mechanism successfully engages staff across the City, minimizing barriers to achieving Permit compliance.

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

1. Protection of Olympia's waters and lands so all community members can enjoy them safely today and for generations to come; and,
2. Compliance with the City's Phase II Municipal Stormwater Permit.
3. Commitment to salmon recovery and tribal treaty rights to fish and protect habitat.

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 community to participate in decision-making processes regarding the City's SWMP and SMAP. 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:

Susan McCleary
Stormwater Associate Planner
Phone 360.570-3794
Email smccleary@ci.olympia.wa.us

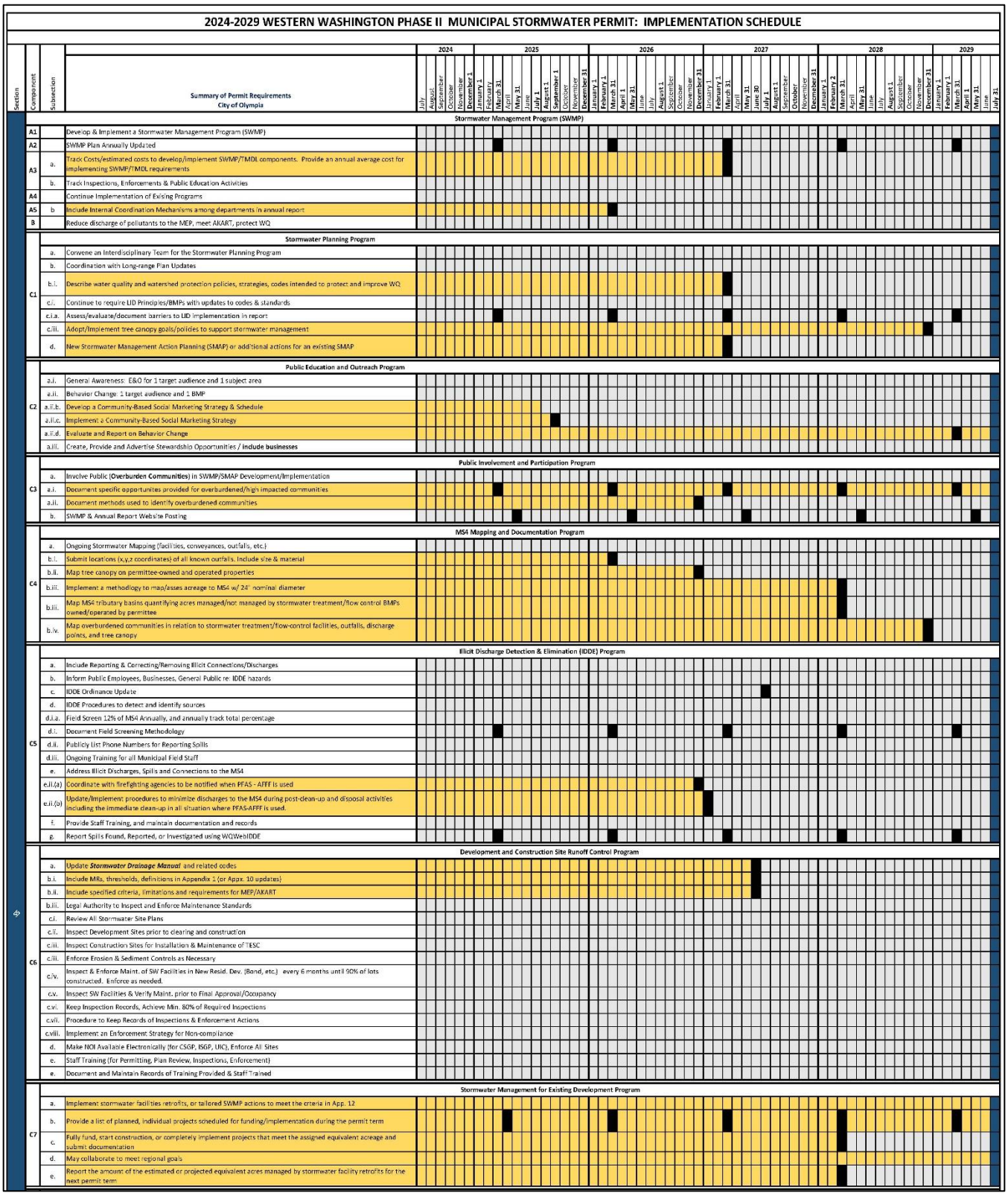
Western WA Municipal Stormwater Permit

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 waste, 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



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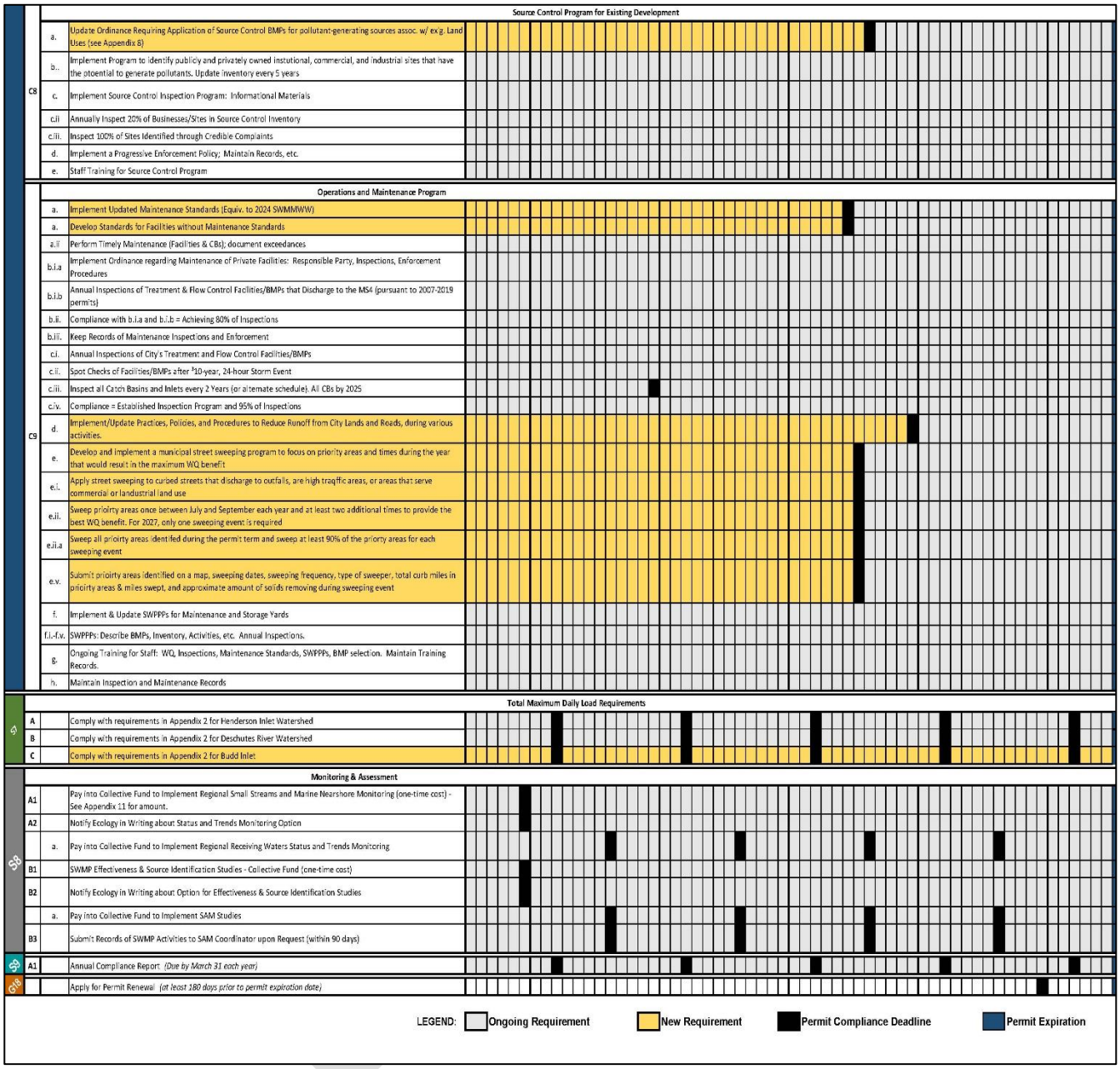
Source Control Program for Existing Development
C8
a. Update Ordinance Requiring Application of Source Control BMPs for pollutant-generating sources assoc. w/ ex.g. Land Uses (see Appendix 8)
b.. Implement Program to identify publicly and privately owned institutional, commercial, and industrial sites that have the otcential to generate pollutants. Update inventory every 5 years
c. Implement Source Control Inspection Program: Informational Materials
c.ii Annually Inspect 20% of Businesses/Sites in Source Control Inventory
c.iii. Inspect 100% of Sites Identified through Credible Complaints
d. Implement a Progressive Enforcement Policy; Maintain Records, etc.
e. Staff Training for Source Control Program
Operations and Maintenance Program
C9
a. Implement Updated Maintenance Standards (Equiv. to 2024 SWMMWW)
a. Develop Standards for Facilities without Maintenance Standards
a.ii Perform Timely Maintenance (Facilities & CBs); document exceedances
b.i.a Implement Ordinance regarding Maintenance of Private Facilities: Responsible Party, Inspections, Enforcement Procedures
b.i.b Annual Inspections of Treatment & Flow Control Facilities/BMPs that Discharge to the MS4 (pursuant to 2007-2019 permits)
b.ii. Compliance with b.i.a and b.i.b = Achieving 80% of Inspections
b.iii. Keep Records of Maintenance Inspections and Enforcement
c.i. Annual Inspections of City's Treatment and Flow Control Facilities/BMPs
c.ii. Spot Checks of Facilities/BMPs after ³10-year, 24-hour Storm Event
c.iii. Inspect all Catch Basins and Inlets every 2 Years (or alternate schedule). All CBs by 2025
c.iv. Compliance = Established Inspection Program and 95% of Inspections
d. Implement/Update Practices, Policies, and Procedures to Reduce Runoff from City Lands and Roads, during various activities.
e. Develop and implement a municipal street sweeping program to focus on priority areas and times during the year that would result in the maximum WQ benefit
e.i. Apply street sweeping to curbed streets that discharge to outfalls, are high traqffic areas, or areas that serve commercial or landustrial land use
e.ii. Sweep priority areas once between July and September each year and at least two additional times to provide the best WQ benefit. For 2027, only one sweeping event is required
e.ii.a Sweep all priority areas identifed during the permit term and sweep at least 90% of the priorty areas for each sweeping event
e.v. Submit priority areas identified on a map, sweeping dates, sweeping frequency, type of sweeper, total curb miles in priority areas & miles swept, and approximate amount of solids removing during sweeping event
f. Implement & Update SWPPPs for Maintenance and Storage Yards
f.i.-f.v. SWPPPs: Describe BMPs, Inventory, Activities, etc. Annual Inspections.
g. Ongoing Training for Staff: WQ, Inspections, Maintenance Standards, SWPPPs, BMP selection. Maintain Training Records.
h. Maintain Inspection and Maintenance Records
Total Maximum Daily Load Requirements
S
A Comply with requirements in Appendix 2 for Henderson Inlet Watershed
B Comply with requirements in Appendix 2 for Deschutes River Watershed
C Comply with requirements in Appendix 2 for Budd Inlet
Monitoring & Assessment
S8
A1 Pay into Collective Fund to Implement Regional Small Streams and Marine Nearshore Monitoring (one-time cost) - See Appendix 11 for amount.
A2 Notify Ecology in Writing about Status and Trends Monitoring Option
a. Pay into Collective Fund to Implement Regional Receiving Waters Status and Trends Monitoring
B1 SWMP Effectiveness & Source Identification Studies - Collective Fund (one-time cost)
B2 Notify Ecology in Writing about Option for Effectiveness & Source Identification Studies
a. Pay into Collective Fund to Implement SAM Studies
B3 Submit Records of SWMP Activities to SAM Coordinator upon Request (within 90 days)
S9 A1 Annual Compliance Report (Due by March 31 each year)
C10 Apply for Permit Renewal (at least 180 days prior to permit expiration date)
LEGEND: Ongoing Requirement New Requirement Permit Compliance Deadline Permit Expiration

Appendix B

Underground Injection Control Program

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 (UIC) Program, Chapter 173 -218 WAC, administered by WA Ecology protects groundwater quality by regulating discharges to UIC wells. These wells discharge fluids into the subsurface and come in many variations. For more information, visit: Volume I Chapter 4 page 157 for I-4 UIC Program Guidelines in the 2024 Stormwater Management Manual for Western Washington (SWMMWW) *2019SWMMWW (wa.gov).* Olympia uses the presumptive approach to meet UIC Program rule authorization as allowed by Ecology. This means the City has a single jurisdiction wide Stormwater Management Program (SWMP) that combines requirements for both municipal UIC wells and the municipal separate storm sewer system (MS4). All UIC wells must be registered using Ecology's online registration process before use. Registrations for UIC wells that manage stormwater must be submitted 60 days prior to well construction. There is no fee to register injection wells. See the following website for details: *https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/underground-injection-control-program/register-uic-wells-online* 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.