



2021 NPDES Permit Update & **Stormwater Management Program**

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WESTERN WASHINGTON PHASE II MUNICIPAL STORMWATER PERMIT

A FEDERAL CLEAN WATER ACT
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) AND
WASHINGTON STATE WASTE DISCHARGE GENERAL PERMIT



City of Bellevue, Washington
NPDES ANNUAL REPORT
DRAFT 2021 STORMWATER
MANAGEMENT PROGRAM PLAN /
2020 COMPLIANCE REPORT

January 2021



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Direction for today

Seeking feedback on the 2021
Stormwater Management Program
(SWMP)



THE DRAIN IS JUST FOR RAIN

Agenda

- History of the NPDES permit
- 2019-2024 permit requirements
- The 2021 SWMP
- Public meeting

City of Bellevue NPDES History

- 1st permit issued in 2007 – based on 1990 census. Bellevue is a Phase II permittee.
- 5-year permit term that allows for stormwater discharge to Waters of the State.
- Issued by the Department of Ecology under the Federal Clean Water Act
- Progressive - building off the previous permit conditions.
- Reissued in 2013 and again in 2019. Each had a one-year extension.
- Current WW Phase I/II NPDES permits are under appeal by Puget Soundkeeper Alliance. Bellevue has elected to intervene.

2019-2024 NPDES Phase II Permit Requirements

- S5.C.1 - Stormwater Planning
- S5.C.2 - Public Education and Outreach (E&O)
- S5.C.3 - Public Involvement and Participation
- S5.C.4 – MS4 Mapping and Documentation
- S5.C.5 - Illicit Discharge Detection and Elimination (IDDE)
- S5.C.6 - Controlling Runoff from New Development, Redevelopment, and Construction Sites
- S5.C.7 - Operations and Maintenance (O&M)
- S5.C.8 – Source Control Program for Existing Development
- S8 - Monitoring and Assessment

Significant changes from previous permits



Stormwater Planning

Identify & prioritize watersheds/drainage basins.

Create a Stormwater Management Action Plan (SMAP) for one basin.

Likely that we will be required to implement the SMAP next permit cycle.



Source Control

New inspection, education and enforcement program.

Dedicated resources – new program and new FTE.

Designed to reduce potential pollutants from entering the stormwater system.

Stormwater Management Program (SWMP) Plan

- Required to be updated annually.
- The SWMP covers the 5-year permit term (2019-2024).
- Provide opportunity for Public Involvement & Participation.
- Provides guidance to staff on permit requirements.
- Provides an outline to the public on how we manage our NPDES obligations.
- Formatting follows the permit.
- Each section indicates the requirements, current activities & future actions.
- Guidance document for staff & interested parties.
- Updated annually no later than March 31st.
 - Submitted to Ecology with Annual Report.

SWMP Administration

- Annually prepare and/or update the Stormwater Management Program Plan.
- Submit the annual report to Ecology by March 31st.
- For 2021, we will be required to include a written description of our internal coordination mechanisms.

Stormwater Planning

- Convene an interdisciplinary team by August 1, 2020.
- Respond to the series of Stormwater Planning Annual Report Questions in March 2021 and again in March 2023.
- Submit a watershed inventory and a brief description of the receiving waters in March of 2022.
- Document the prioritized and ranked list of receiving waters in June of 2022.
- Develop a SMAP for at least one high priority catchment area in March 2023.

Public Education & Outreach

- Annually select at a minimum one target audience and one subject.
- By July 2020, conduct a new evaluation of the effectiveness of an ongoing behavior change campaign.
- By February 2021, follow social marketing practices and methods.
- Implement the strategy developed no later than April 2021.
- Evaluate and report on changes in understanding and adoption of targeted behaviors by March 2024.

Public Involvement & Participation

- Annually invite the public to comment on the SWMP.
- Post on the City website the SWMP Plan and the annual report no later than May 31st each year.
- Outreach program to be included as part of the upcoming Watershed Management Planning process.

Mapping & Documentation

- By January 2020, begin to collect size and material for all known MS4 outfalls.
- By August 2023, complete mapping of all known connections from the MS4 to a privately-owned stormwater system.
- Format for our mapping is required to electronic with fully described mapping standards by August 2021.

Illicit Discharge Detection & Elimination (IDDE)

- Establish and maintain an ongoing program to prevent, detect, characterize, trace and eliminate illicit connections and discharges.
- Provide training to staff responsible for IDDE activities.
- Complete field screening for an average of 12% of the MS4 each year beginning August 2019.

Controlling Runoff from New Development, Redevelopment & Construction Sites

- Implement an ordinance or other enforceable mechanism that addresses runoff from development, redevelopment, and construction.
- Adopt and make effective a local program, no later than June 2022 that meets the requirements set forth in the Permit.
 - Site planning,
 - Best Management Practices (BMP) selection criteria,
 - BMP design criteria,
 - BMP infeasibility criteria,
 - Low Impact Development (LID) competing needs criteria,
 - BMP limitations.

Operations & Maintenance

- Ongoing program for inspection and maintenance of stormwater facilities owned, operated or regulated by the City.
- By June 2022, update the Stormwater maintenance standards as necessary to meet the requirements of the Permit
- By December 2022, document the practices, policies and procedures to reduce stormwater impacts.
- Update Stormwater Pollution Prevention Plans by December 2022.

Source Control Program for Existing Development

- By August 2022, adopt and make effective an ordinance(s), or other enforceable document, requiring the application of source control BMPs
- Establish a Source Control inventory by August 2022
- Implement an inspection program for identified sites by January 2023
- By January 2023, implement a progressive enforcement policy

2020 Compliance Report

- *Fully compliant in 2020.*
- *Still gathering final numbers for reporting to Ecology.*
- *Over 12000 public and private structures/stormwater water facilities were inspected.*
 - *Cleaning/maintenance needs appear to be lower than in previous years.*
- *Education and Outreach and training programs affected more than other program areas by COVID.*
- *Illicit discharge investigations and private drainage inspection efforts also affected to a lesser scale.*

Questions & Comments

The Stormwater Management Program Plan is available at:

BellevueWA.gov/Stormwater-Management-Program

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SWMP Administration

S5.A - SWMP Administration – 2019-2024 Planned Activities		
<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
SWMP preparation, updates and annual submittal with the Annual Report.	Annually - March 31st	The SWMP is prepared annually in January-February and submitted to Ecology with the annual compliance report on or before March 31 st .
Submit the annual report electronically using Ecology's Water Quality Permitting Portal (WQWebPortal).	Annually -March 31st	The annual report is prepared in January-February annually and submitted to Ecology on or before March 31 st .
Permittees shall include a written description of internal coordination mechanisms in the Annual Report due no later than March 31, 2021.	March 31, 2021	To encourage collaboration and efficient use of resources, the City's NPDES Coordinator works closely with member of affected Departments to ensure NPDES Permit requirements are within compliance and to obtain information necessary to submit the annual compliance report. The affected departments include Utilities, Development Services Department (DSD), Information Technology (IT), Civic Services, Fire, Planning and Community Development (PCD), City Attorney's Office (CAO), Finance, Parks and Community Services (Parks), Transportation (Trans.), Police, City Clerk's Office, and the City Manager's Office (CMO).

Stormwater Planning

S5.C.1 – Stormwater Planning – 2019-2024 Planned Activities		
<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
Convene an interdisciplinary team to inform and assist in the development, progress and influence of this program.	August 1, 2020	The City has a Watershed Management Team that serves to meet this requirement. A portion of the team's work is to respond to Stormwater Planning questions and prepare necessary documentation.
On or before March 31, 2021, the Permittee shall respond to the series of Stormwater Planning Annual Report Questions to describe how anticipated stormwater impacts on water quality were addressed, if at all, during the 2013-2019 permit term.	March 31, 2021	See the Annual Report in Section 12 of the SWMP; questions 6-13.
On or before January 1, 2023, the Permittee shall respond to the series of Stormwater Planning Annual Report Questions to describe how anticipated stormwater impacts on water quality are currently being addressed.	January 1, 2023	To be evaluated in 2022
By March 31, 2022, submit a watershed inventory and include a brief description of the relative conditions of the receiving waters and the contributing areas.	March 31, 2022	The City has an existing watershed inventory of 26 drainage basins. Further refinement is under development.
No later than June 30, 2022, document the prioritized and ranked list of receiving waters.	June 30, 2022	To be developed in 2022 as part of the Watershed Management Plan.
Stormwater Management Action Plan (SMAP) - No later than March 31, 2023, Permittees shall develop a SMAP for at least one high priority catchment area.	March 31, 2023	To be developed in 2022/2023 as part of the Watershed Management Plan.

Public Education & Outreach

S5.C.2 – Education and Outreach – 2019-2024 Planned Activities		
<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
Permittees shall annually select at a minimum one target audience and one subject area as defined in the permit, to provide subject area information to the target audience on an ongoing or strategic schedule.	Ongoing - Annually	Outreach will continue in the form of school programs, tabling at community events, and information in the city's newsletter and utilities bill inserts.
No later than July 1, 2020, each Permittee shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign and document lessons learned.	July 1, 2020	<p>Because the city discontinued the previous behavior change campaign after evaluation, we will instead share lessons learned from our 2019 Stormwater Runoff Awareness, Attitudes, and Behavior Survey of Residents.</p> <p>Bellevue will develop a strategy and schedule for a new target audience under option 3 in S5.C.2.a.ii.(c)</p> <p>Bellevue has joined with regional partners to support outreach for management of solid waste dumpsters at commercial dumpster areas.</p>
By February 1, 2021, each Permittee shall follow social marketing practices and methods, similar to community based social marketing and develop a campaign tailored to the community.	February 1, 2021	Planning to help lead regional effort to prevent pollution around commercial dumpster areas.
No later than April 1, 2021, begin to implement the strategy developed.	April 1, 2021	A pilot rollout of commercial dumpster awareness targeting 2 businesses will be implemented by April 1st, 2021 followed by a more aggressive schedule to 10-20 businesses.
No later than March 31, 2024, evaluate and report on changes in understanding and adoption of targeted behaviors and any planned or recommended changes to the campaign in order to be more effective.	March 31, 2024	To be developed following implementation of the dumpster outreach strategy.

Public Involvement & Participation

S5.C.3 – Public Involvement & Participation – 2019-2024 Planned Activities		
<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
<ul style="list-style-type: none"> Each Permittee shall post on their website their SWMP Plan and the annual report no later than May 31st each year. 	Annually – May 31	<p>The draft SWMP is posted for comment in mid to late January annually. A Public Hearing is held annually at the City's Environmental Services Commission meeting in February.</p> <p>The final SWMP is included in the submittal to Ecology and is posted to the City website along with the annual report on or before May 31st annually. Typically, this occurs in late March-early April.</p>

Mapping & Documentation

S5.C.4 – MS4 Mapping & Documentation – 2019-2024 Planned Activities

<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
No later than January 1, 2020, begin to collect size and material for all known MS4 outfalls during normal course of business.	January 1, 2020	Ongoing
No later than August 1, 2023, complete mapping of all known connections from the MS4 to a privately-owned stormwater system.	August 1, 2023	Mapping of private connections is underway.
No later than August 1, 2021, the required format for mapping is electronic with fully described mapping standards.	August 1, 2021	The City has fully described mapping standards. Stormwater system information is available to download via GIS Shapefiles on the City website.

Illicit Discharge Detection & Elimination

S5.C.5 – Illicit Discharge Detection & Elimination – 2019-2024 Planned Activities

<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
All Permittee's shall complete field screening for an average of 12% of the MS4 each year. Permittee's shall annually track total percentage of the MS4 screened beginning August 1, 2019.	August 1, 2019	Ongoing. The City tracks MS4 screening through the Operations and Maintenance inspection program. Approximately 50% of the system is inspected annually.

Controlling Runoff from New Development, Redevelopment & Construction Sites

S5.C.6 – Controlling Runoff from New Development, Redevelopment & Construction Sites - 2019-2024 Planned Activities

<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
Each Permittee shall adopt and make effective a local program, no later than June 30, 2022 that meets the requirements set forth in the Permit.	June 30, 2022	The City implemented an ordinance in 2016 that meets the current Permit requirements. (Ord 6321) (See BCC 24.06 & 24.06.065)

Operations & Maintenance

S5.C.7 – Operations & Maintenance - 2019-2024 Planned Activities		
<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
No later than June 30, 2022, Permittees shall update their maintenance standards as necessary to meet the requirements of the Permit.	June 30, 2022	The City has administratively adopted the Stormwater Management Manual for Western Washington as our maintenance standards.
No later than December 31, 2022, document the practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the Permittee, and road maintenance activities under the functional control of the Permittee.	December 31, 2022	Documentation associated with impacts to meet this requirement is captured in the City's work order tracking system (Maximo). Further refinement is under development.
As necessary, update SWPPPs no later than December 21, 2022 per Permit requirements.	December 21, 2022	Under review.

Source Control Program for Existing Development

S5.C.8 – Source Control Program for Existing Development - 2019-2024 Planned Activities

<u>Activity</u>	<u>Due Date</u>	<u>Status/Notes</u>
No later than August 1, 2022, Permittees shall adopt and make effective an ordinance(s), or other enforceable document, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.	August 1, 2022	Source Control Program development is scheduled to begin in January of 2022. Existing code may satisfy this requirement.
No later than August 1, 2022, Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial and industrial sites which have the potential to generate pollutants to the MS4.	August 1, 2022	Source Control Program development is scheduled to begin in January of 2022.
No later than January 1, 2023, Permittees shall implement an inspection program for identified sites.	January 1, 2023	Source Control Program development is scheduled to begin in January of 2022.
No later than January 1, 2023, Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable timeframe as specified in the Permit.	January 1, 2023	Source Control Program development is scheduled to begin in January of 2022.