

REGIONAL STORMWATER MANAGEMENT PROGRAM FOR UNION GAP

IN COMPLIANCE WITH THE EASTERN WASHINGTON PHASE II MUNICIPAL
STORMWATER PERMIT



WAR04-6010 - CITY OF UNION GAP

PROGRAM - YEAR 14

APRIL 2023

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Abbreviations and Acronyms

AKART – All Known, Available, and Reasonable methods of control and Treatment
BMP – Best Management Practice
Co-permittees – Yakima County, City of Yakima, City of Union Gap, City of Sunnyside
DDD - Dichlorodiphenyldichloroethane
DDE – Dichlorodiphenyldichloroethylene
DDT – Dichlorodiphenyltrichloroethane
Ecology – Washington State Department of Ecology
ESA – Endangered Species Act
GIS - IDDE – Illicit Discharge Detection and Elimination
ILA – Interlocal Agreement or Intergovernmental Local Agreement
LID – Low Impact Development
MEP – Maximum Extent Practicable
MS4 – Municipal Separate Storm Sewer System
NOI – Notice of Intent
NPDES – National Pollutant Discharge Elimination System
O&M – Operation and Maintenance
PAH – Polyaromatic Hydrocarbon
POTW – Publicly Owned Treatment Works
RCW – Revised Code of Washington State
RSL – Regional Stormwater Lead
RSWG – Regional Stormwater Working Group
RSWMP – Regional Stormwater Management Program
SWPPP – Stormwater Pollution Prevention Plan
SWMP – Stormwater Management Program
TBD – to be determined
TMDL – Total Maximum Daily Load
TSS – Total Suspended Solids
UA – Urbanized Area
UGA – Urban Growth Area
UIC – Underground Injection Control
USEPA – United States Environmental Protection Agency
VE – Value Engineering
WAC – Washington Administrative Code
YCHD – Yakima County Health District

1.1 Regulatory Environment

The Clean Water Act, enacted in 1972, contains the legal requirement for protecting the quality of waters of the nation. The Act authorizes the USEPA Administrator to carry out its requirements. USEPA initially focused water quality improvement efforts on reducing discharges of pollutants from pipes (point sources), primarily wastewater from industrial processes and municipal sewer treatment facilities.

Diffuse sources of pollutants (non-point sources) also contribute to water pollution nationwide. Runoff from stormwater can collect pollutants as it flows across the landscape and discharges to surface and ground water. As a result, USEPA has begun to regulate urban stormwater discharges by requiring municipalities to obtain National Pollutant Discharge Elimination System (NPDES) permits for stormwater.

Phase I of the NPDES Stormwater Program began in 1990. Large and medium size municipalities with populations greater than 100,000 were required to develop and implement SWMPs. Phase II of the regulations requires small municipalities (<100,000) and contiguous areas with smaller – but still urban – communities to develop and implement SWMPs. In February 2007, the Department of Ecology issued the Eastern Washington Phase II Municipal Stormwater Permit, requiring the co-permittees to submit a Notice of Intent (NOI) seeking coverage and to comply with the terms of the permit. Ecology required permittees and co-permittees to submit an NOI for coverage and to comply with the current Phase II Municipal Stormwater Permit effective August 1, 2019.

Phase II communities must implement performance measures that reduce pollutants in stormwater to the “maximum extent practicable” (MEP). MEP is the technology-based standard established by Congress in CWA §402(p)(3)(B)(iii). The SWMP focuses on performance measures that are technically sound and cost effective, while meeting permit requirements

2 PROGRAM ELEMENTS AND PERFORMANCE MEASURES

This section describes the eight SWMP elements (program elements) contained in the permit:

- 1) Public Outreach and Education
- 2) Public Involvement and Participation
- 3) Illicit Discharge Detection and Elimination
- 4) Construction Stormwater Runoff Control
- 5) Post-Construction Stormwater Management for New Development and Redevelopment
- 6) Municipal Operations and Maintenance

The SWMP addresses the program elements above through the development of performance measures. Each performance measure contains measurable activities that describe specific actions taken to implement the performance measure.

The program elements are organized consistent with the permit structure in Sections S5, S7 and S8. Each program element contains an introductory statement that generally discusses permit requirements and identifies other program elements related to the current program element, called supporting program elements. Fact sheets then describe the performance measures within the program element, state goals, identify existing activities, provide measurable activities, and identify assessment documents. A performance measure fact sheet example is provided ([Figure 2](#)). A table summarizing the performance measures, implementation schedules and responsible departments is provided at the end of each program element.

Figure 2. Performance Measure Template

PERFORMANCE MEASURE <i>Permit section, name of Performance Measure, implementation deadline</i>
GOAL An anticipated outcome that guides the use of the performance measure.
EXISTING ACTIVITIES This section describes existing activities associated with the performance measure. Additional actions implemented by the permittees relating to S5.B of the permit are described here.
MEASURABLE ACTIVITIES This section lists the quantifiable activities that describe how the performance measure will be accomplished and the responsible party. Measurable activities are those actions describing what will be done to comply with the permit. Activities include such things as reviewing or developing a specific number and type of document or procedure, providing a specific number and type of training, etc.
ASSESSMENT This section identifies documentation needed to assess performance measures as required by the permit.
ACCOMPLISHMENTS This section will list measureable activities accomplished during the previous calendar year. A statement is provided if no activities were required during the previous calendar year.
APPROPRIATENESS This section will contain an evaluation of the appropriateness of the Performance Measure, as required by permit section S8.B.2.

2.1 Public Education and Outreach Program Element (S5.B.1)

The Public Education and Outreach Program Element focuses on educating the public about the potential impact of stormwater discharges on receiving waters. Increased public knowledge about how their actions and choices affect stormwater and ultimately the water bodies of Union Gap. Public Education should result in increased public acceptance and support of the stormwater program.

2.1.1 Permit Requirements for Public Education and Outreach

Section S5.B.1 of the Eastern Washington Phase II NPDES Stormwater Permit requires permittees to continue to implement public education and outreach program strategies and activities. The strategies shall be designed to reach all targets audiences in Union Gap.

2.1.2 Supporting Program Elements

The Public Participation and Involvement Program Element works with the Public Education and Outreach Program Element by encouraging citizens to become informed and involved in the stormwater program. Specific outreach tasks are also identified in the Illicit Discharge and Detection Elimination, Construction and Post-Construction Program Elements.

2.1.3 Performance Measures

The City anticipates continuing the partnership with the Regional Stormwater Group (RSWG) which involves collaboration with Yakima County, City of Sunnyside, and the City of Selah to assist with the Public Education and Outreach element. The City will also continue the partnership with Franklin County Conservation District to achieve the Public Education and Outreach element through their Drain Rangers program.

Performance Measure

S5.B.1a. Implement the 2023 Public Outreach Plan

ILA=Yes

GOAL

Educate the public, businesses and the development community about:

- 1) Potential pollution impacts of stormwater on receiving waters.
- 2) Illicit discharges.
- 3) The impact of development on stormwater pollution.

EXISTING ACTIVITIES

In accordance with the 2023 Public Outreach Plan, a general public message of “Only Rain in the Drain!” is being distributed. See current accomplishments and planned activities below.

MEASURABLE ACTIVITIES

Measureable activities for Public Outreach and Education will be in accordance with the 2023 Public Outreach Plan.

ASSESSMENT

The City of Union Gap actively participates in the Regional Stormwater Working Group (RSWG) which involves collaboration with Yakima County, City of Sunnyside, and the City of Selah. Union Gap partners with the RSWG to assist with the Public Education and Outreach element (S5.B.1) of the Eastern Washington Phase II Municipal Stormwater permit. All permittees are required to implement a public education and outreach program designed to reach target audiences to educate and encourage changed behaviors. The RSWG has contracted with the Franklin County Conservation District to achieve this goal through their Drain Rangers Program. This course is provided on an as requested basis, depending on the organization the RSWG is supporting. Students range between the ages of 6-14. At the end of each class, students participate in a check on learning activity. Students are asked to reciprocate on thing they learned during the class, and then they participate in a question and answer activity to reinforce the knowledge learned. They are also provided activity books to help the retention of new information. Upon completion of each class, the total number of students is recorded, intermediate and middle schools.

ACCOMPLISHMENTS

The 2023 Public Outreach Plan focused on a broad range of audiences, with approximately 70% being directly focused youth education and awareness. Utilizing the “Only Rain in the Drain!”, originally developed by Asotin County under an Ecology Grant of Regional or Statewide Significance (GROSS) grant, the RSWG continues to develop awareness and prevention materials to educate our youth, and provide training tools through several marketing channels. The message was distributed through extensive community program activities, website outreach services, online videos, and social media sites. This year’s efforts continued into the broadening our direct “community marketing” concepts.

The regional stormwater program reached out to children and the public in 2022 during the Central Washington State Fair; which provides a booth annually for stormwater education. RSWG and ILA partner staff manned the booth, along with staff from the Yakima Nation and the City of Yakima, and provided a large quantity of stormwater education and awareness give-away items for a broad range of target markets. Staff were available to answer questions about the stormwater program and educate the public on how to identify and report illicit discharge.

Lastly, new outreach material was developed in response to a review of illicit discharge complaints that were called in to the County over the last two years. A brochure outlining the acceptable ways to drain and clean swimming pools and hot tubs was created in 2018 for homeowners. This brochure was available for handout at the 2022 CWSF booth and is available for handout in the City of Union Gap City Hall lobby. Training materials already developed that target sources of stormwater pollution such as construction site track out and other forms of illicit discharge are always available, in English and Spanish. Brochures and newsletters are also available at the front counter of Public Services Department offices that provide details on BMPs and recent stormwater activities.

APPROPRIATENESS

Public Outreach is very appropriate, especially during the interim permit period. Most permit compliance efforts in 2022 have been focused on Public Outreach.

2.2 Public Involvement and Participation Program Element

The Public Involvement and Participation Program Element provides opportunities for the public to become involved in decisions related to reducing pollutants in stormwater. Through participation, the public provides valuable input and assistance in program development and implementation. Increased public involvement and participation result in increased public acceptance and support of the program, and help to ensure a successful and effective program.

2.2.1 Permit Requirements for Public Involvement and Participation

Continue to provide ongoing opportunities for the public to participate in SWMP decision-making. Post online annual reports and SWMP Plan for previous calendar year by May 31 of each year.

2.2.2 Supporting Program Elements

The regional stormwater website (Public Education and Outreach Program Element) will provide an accessible means of disseminating the SWMP information.

2.2.3 Performance Measures

PERFORMANCE MEASURE

S5.B.2 Public Input on SWMP

ILA=No

GOAL

Promote public participation in the design and implementation of the SWMP. The SWMP document provides the blueprint for regional compliance with the Permit. Public input will be solicited on this document to ensure all interested parties have a voice in activities that are conducted to comply with the Permit and reduce potential impacts associated with stormwater discharge from the regional permittees.

EXISTING ACTIVITIES

The City of Union Gap complies with existing State and local public notice requirements regarding the adoption of public plans or policies implemented.

A specific public input opportunity has been conducted in past years to describe the program and solicit input. These meetings that are open to the public to attend take quarterly, have been sparsely attended. Notifications of the meeting times and dates are announced on RSWG Newsletter and Website. Due to the lack of public participation, no changes to the program have been implemented.

MEASURABLE ACTIVITIES

1. City of Union Gap has posted the SWMP document on the Stormwater web page and updated at least annually.
2. The RSWG publishes the date and time of each meeting on multiple advertising outlets in an effort to bring awareness to the public and seek participation.

ASSESSMENT

1. Receive, address and log comments received at any time of the year regarding the SWMP.

ACCOMPLISHMENTS

- No SWMP comments were received during the past calendar year.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP.

2.3 Illicit Discharge Detection and Elimination (IDDE) (S5.B.3)

Most urban storm drain systems convey flows other than stormwater. These non-stormwater discharges enter the storm drain system from a variety of sources, such as landscape irrigation or car washing, and illicit discharges (sources of pollutants that enter the storm drain system through illicit connections and illegal dumping). Non-stormwater contributions and illicit discharges are potential sources of pollutants discharged from the MS4 that may adversely impact receiving waters. The Eastern Washington Phase II NPDES Stormwater Permit requires the permittees to “detect and eliminate” non-stormwater discharges to the storm drain system.

2.3.1 Permit Requirements for Illicit Discharges

The Eastern Washington Phase II NPDES Stormwater Permit requires permittees to continue implementing the enforceable mechanism to prohibit illicit discharges, compliance strategy, IDDE and municipal staff training, citizen hotline and IDDE response, and maintain map of MS4.

2.3.2 Supporting Program Elements

Many operations such as hazardous waste pickup activities, MS4 and DID maintenance, street sweeping and roadwork, partially address this program element’s intent. City of Union Gap has prohibitions in our code making it illegal to pollute the storm drain system. The Public Education and Outreach Program and Municipal Operations/Good Housekeeping Program elements also inform public employees, businesses, and the public of hazards including human and environmental health risks associated with illegal discharges and improper disposal of waste.

2.3.3 Performance Measures

PERFORMANCE MEASURE

S5.B.3 Maintain map of MS4

ILA=No

GOAL

A map of the MS4 is required to effectively identify extent of the storm drain system, identify where pollutants may enter the system and prevent illicit discharges. Ecology requires permittees to maintain a map of their stormwater system and update the map as changes occur.

EXISTING ACTIVITIES

The MS4 has been mapped in the City of Union Gap in accordance with the current permit.

The Construction Activities and Post-Construction SMP Elements both require knowledge of the MS4 location to determine if proposed activity will discharge to the MS4 and is therefore regulated. A general permit requirement is to conduct spot checks of the MS4 following storms with a return frequency greater than the 25 year event. A knowledge of the system location is critical to this task.

MEASURABLE ACTIVITIES

Document changes made to GIS layers that were used to develop the system maps.

ASSESSMENT

1. List of changes made to map layers. GIS metadata is an ideal vehicle to maintain a log or list of changes.

ACCOMPLISHMENTS

- GIS mapping is continuously updating as new MS4 locations are installed.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in our SWMP. Mapping, followed by smoke testing to confirm connections, has resulted in determination of illicit and non-stormwater connections from the MS4. Mapping has also identified areas where outfalls can be eliminated, reducing the impact of flow and pollutants to receiving waters. Improvements to water quality should result from removal of illicit connections and elimination of outfalls.

PERFORMANCE MEASURE

S5.B.3 Continue Enforcement of Illicit Discharge Ordinances

ILA=No

GOAL

Enforce ordinances to prohibit illicit discharges to the storm drain system.

EXISTING ACTIVITIES

Yakima County Health District (YCHD) enforces County ordinances for solid waste disposal, sewage disposal, and does outreach, inspections, and enforcement particularly as relates to septic tanks and septic tank pumps. YCHD investigates improper sewage disposal practices as reported by the public. These activities reduce the likelihood of stormwater contamination from improperly maintained or sited septic systems.

The City of Union Gap ordinances prohibiting illicit connections and discharge to their MS4.

MEASURABLE ACTIVITIES

Yakima County and each jurisdiction will maintain a log of illicit discharge and connection calls, observations and complaints; maintain a record of their notification and follow-up to resolve the discharge or connection.

ASSESSMENT

Number and types of cases will be reviewed and used for input into the Public Outreach program as appropriate. Construction track-out has been identified as a consistent IDDE issue and has been included for a targeted outreach campaign in 2023.

ACCOMPLISHMENTS

City of Union Gap reported 1 case.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. Water quality should improve over time as code enforcement personnel contact potential violators, public education messages highlight the new requirement and illicit connections are removed as a result of the ordinance.

PERFORMANCE MEASURE

S5.B.3 Continue IDDE Response Activities

GOAL

Continue procedures for consistent regional investigations to detect and address non-stormwater discharges to the regulated MS4, including spills, illicit connections, and illegal dumping.

EXISTING ACTIVITIES

The regional co-permittees have programs to address spills and illegal dumping of hazardous materials, including those that may reach the MS4. In the event of a spill, local emergency response agencies within the County are supplemented by a Regional Response Team and Ecology. Illegal dumping of hazardous materials is regulated by State Dangerous Waste requirements (WAC 173-303-145) and the Uniform Fire Code.

MEASURABLE ACTIVITIES

1. City of Union Gap will continue to implement procedures for the following activities required by the permit:
 - Locating priority areas;
 - Field assess 40% of the MS4 to detect and identify illicit discharges and connections
 - Characterizing discharges found by or reported to the Permittees;
 - Tracing the source of illicit discharges;
 - Ending the discharge.

The collection of procedures and their implementation shall constitute the illicit discharge detection and elimination “program” required by §S5.3.c of the permit.

2. City of Union Gap will report all illicit discharge activity in their annual reports.
3. City of Union Gap will report all illicit discharge activity in the annual reports and SWMP.

ASSESSMENT

1. Document activities to identify and eliminate non-stormwater discharges.
2. Record citizen complaints and responses regarding illicit discharges to the storm drain system.
3. Record illicit discharges identified, investigated, including date and location of incident, type and quantity of material dumped or discharged, and municipal response, and all other information required by Appendix 7 of the permit.
4. Document enforcement actions taken to eliminate illicit discharges.

ACCOMPLISHMENTS

- Dry weather inspections were undertaken during maintenance activities.
- No inspections resulted in source tracing.
- No formal enforcement actions were taken by the co-permittees.

APPROPRIATENESS

Identification and removal of illicit discharges and connections will improve water quality discharged from the regional MS4s to area water bodies.

PERFORMANCE MEASURE

S5.B.3 Maintain Illicit Discharge Hotline

GOAL

Advertise and maintain a regional hotline for receipt of calls reporting illicit discharges. A hotline or telephone number for receiving public observations or complaints related to illicit discharge is required by the Permit.

EXISTING ACTIVITIES

Related activities include those systems in place to take emergency calls related to hazardous materials or illegal dumping.

MEASURABLE ACTIVITIES

1. City of Union Gap will use Ecology's IDDE database to track illicit discharge reports and follow-up actions.
2. City of Union Gap will forward calls to the hotline when appropriate or notify County stormwater staff when illicit discharge calls are received by their jurisdictions.

ASSESSMENT

1. Maintain a database of calls received and follow-up actions taken.

ACCOMPLISHMENTS

- Hotline established 2007. The number is 509.574.2300
- Zero calls were received in 2022.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. It is anticipated that hotline use will increase as the public becomes more aware of stormwater problems through the public education program.

PERFORMANCE MEASURE

S5.B.3 IDDE and Municipal staff training

GOAL

Train staff that 1) receive calls about illicit discharges, 2) may encounter illicit discharges in the course of their work, and 3) will investigate illicit discharges. Training will be tailored to each group of employees and focus on specific procedures developed under other Performance Measures in this Program Element.

EXISTING ACTIVITIES

Most employee groups already conduct some form of regular training on procedures, safety, or trade specific practices. Our field employee associated with the RSWG undergoes training regarding illicit discharge.

MEASURABLE ACTIVITIES

1. Yakima County presently offers training classes every other month; which is available for all RSWG members, their employees, and the public for participation.
2. City of Union Gap will identify appropriate personnel and provide opportunities for staff to be trained.

ASSESSMENT

1. Document training events. Include number of employees, class rosters, locations.
2. Maintain training presentations for each group of employees.

ACCOMPLISHMENTS

- Individual refresher trainings are available by Yakima County upon request for City of Union Gap.

APPROPRIATENESS

It is anticipated that as employee awareness goes up, the number of reported discharges to the MS4 will also increase, and the number of municipal spills will go down.

Construction Activities Program Element (S5.B.4)

Stormwater draining from construction sites can be a significant source of sediment and attached pollutants. Failure to implement adequate erosion and sediment performance measures can result in higher contributions of sediment to waters than previously contributed from undisturbed land. Excessive sediment loading can result in impacts to water quality. In addition, erosion and sediment transport are vehicles for other pollutants associated with construction activities (such as solvents, petroleum products, trash, pesticides, fertilizers, concrete and paint). Track-out from construction sites continues to be a common source of illicit discharge complaints.

2.3.4 Permit Requirements for Construction Activities

The Eastern Washington Phase II NPDES Stormwater Permit requires the regional municipalities to continue implementing and enforcing program to reduce pollutants from construction activities, including ordinance, providing information to construction operators on training; site plan review and permitting, inspections, and training.

2.3.5 Supporting Program Elements

Local citizens will be more aware of the importance of protecting stormwater quality through public outreach activities. The public participation and IDDE program elements provide mechanisms for the public to notify City of Union Gap inspectors of potential water quality issues.

2.3.6 Performance Measures

PERFORMANCE MEASURE

S5.B.4.a Enforce Construction Site Stormwater Ordinance

GOAL

Enforce an ordinance to require implementation and maintenance of BMPs for erosion and sediment controls at defined construction sites.

EXISTING ACTIVITIES

Construction Stormwater Permits are required by State regulation for construction sites impacting one acre or more.

City of Union Gap adopted an ordinance or resolution; which is listed below: Jurisdiction

	<u>Date Adopted</u>	<u>Ordinance/Resolution Number</u>
City of Union Gap	February 8, 2010	2660

MEASURABLE ACTIVITIES

1. Each jurisdiction will enforce its own ordinance.

ASSESSMENT

1. The number of ordinance enforcement actions will be reported in the annual report.

ACCOMPLISHMENTS

- No enforcement activities were required during the 2022 calendar year.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. Water quality should improve over time as code enforcement personnel contact violators, and the public education message regarding illicit discharges is better known.

PERFORMANCE MEASURE

S5.B.4.b. Continue Construction Site Plan Review

GOAL

Implement procedures for review and approval of stormwater best management practices used during construction activities.

EXISTING ACTIVITIES

Construction and development projects are currently required to obtain coverage under the Ecology General Permit for Construction Sites, using BMPs and standards found in the Stormwater Management Manual for Eastern Washington (2019).

MEASURABLE ACTIVITIES

1. City of Union Gap will review construction project plans that require erosion and sediment control BMPs identified in the ordinance adopted in S5.B.4.a of the permit.

ASSESSMENT

1. Record the number of erosion and sediment control plans received, reviewed, and approved/disapproved by staff.

ACCOMPLISHMENTS

- Number of construction site plans reviewed and approved in 2022:

	<u>Plans Reviewed</u>	<u>Plans Approved</u>
City of Union Gap	7	7

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. The procedure and training should help reviewers assure projects are compliant with the ordinance and minimize construction stormwater runoff and improving water quality.

PERFORMANCE MEASURE

S5.B.4.c. Continue Construction Site Inspection

GOAL

Inspect construction sites to ensure that BMPs are installed and functioning correctly to prevent discharge to the MS4.

EXISTING ACTIVITIES

Regional municipalities have established construction inspection programs that ensure building code compliance. Inspectors visit each site during active phases of construction to record the activities conducted at the site and to ensure construction is being completed according to plans.

Public complaints for construction activities are routed to local building departments; some stormwater construction complaints are routed to stormwater staff. All jurisdictions require applicants to obtain an Ecology Construction Stormwater Permit when projects will meet certain thresholds. Erosion and sediment control permit issues with these permits are referred to the Washington Department of Ecology. Construction sites, regardless of size or Ecology permit status, must retain construction sediment on site in all jurisdictions under the illicit discharge ordinances.

MEASURABLE ACTIVITIES

1. City of Union Gap will keep records of inspections and enforcement actions by staff.
2. City of Union Gap will provide training to construction site inspection staff including:
 - Erosion and sediment controls and other stormwater quality control requirements for construction activities.
 - Procedures for enforcing code compliance, such as issuance of citations or notices of noncompliance.
 - Jurisdictions may opt to send staff to CESCL training and have staff maintain their certification.

ASSESSMENT

1. Document training events. Include number of employees, class rosters, locations.
2. Record the number of inspections and enforcement actions performed by staff.

ACCOMPLISHMENTS

- Number of construction site inspections and enforcement actions in 2020:

	Site Inspected	Enforcement Actions
City of Union Gap	7	0

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. The procedure and training should help inspectors assure projects are compliant with the ordinance during inspections. The inspections should help resolve any deficiencies in BMP selection or installation this minimizing construction stormwater runoff and improving water quality.

PERFORMANCE MEASURE

S5.B.4.d Provide Construction Training Opportunity Information

GOAL

Gather and provide information on training opportunities in the Pacific Northwest and nationally that are applicable to the proper selection, installation, and maintenance of construction site sediment control BMPs.

EXISTING ACTIVITIES

Yakima County provides periodic training opportunity information to the RSWG members and the public on Yakima County's Stormwater Management website, <https://www.yakimacounty.us/1749/Training>

MEASURABLE ACTIVITIES

1. City of Union Gap will provide information they receive on training opportunities through professional contacts or other sources.

ASSESSMENT

1. Maintain a record of training opportunities identified and made available.

ACCOMPLISHMENTS

- Training opportunities were provided on the Regional Stormwater web site as they were available.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. Training opportunities were regularly visited on the Regional Stormwater web site.

2.4 Post-Construction SWMP Element (S5.B.5)

Impacts to water quality caused by development can be minimized through implementing post-construction stormwater quality performance measures. The performance measures and tasks outlined in this section require new development and major redevelopment projects to incorporate post construction stormwater BMPs and to ensure that the measures are operated and maintained once construction is complete.

2.4.1 Permit Requirements for Post-Construction Stormwater Management

The Eastern Washington Phase II NPDES Stormwater Permit requires the permittees to address post-construction stormwater runoff to the MS4 from new development and redevelopment projects within the permit area. Continue to implement ordinance addressing post-construction runoff controls; site plan review and permitting, requiring long-term maintenance; inspections; staff training; and enforcement.

2.4.2 Supporting Program Elements

Public education and outreach programs promote awareness of the importance of stormwater quality controls. Public participation in the development and implementation of the SWMP will be critical to the plan's success. The Construction Program works in parallel with this program element as sites are inspected during construction and post-construction.

2.4.3 Performance Measures

PERFORMANCE MEASURE

S5.B.5 Enforce Post-Construction Stormwater Ordinances and Conduct Stormwater Plan Review

GOAL

Enforce ordinances to require post-construction stormwater runoff controls for discharges to the MS4 from new development or re-development projects discharging to public MS4s.

EXISTING ACTIVITIES

City of Union Gap requires new developments to retain stormwater on site, to a 25-year design storm, using methods found in the Yakima Regional Stormwater Manual. To obtain short or long subdivision approval, proposed development projects in City of Union Gap require a site drainage plan demonstrating how stormwater will be retained and infiltrated on site.

Ordinances were adopted in February 2010 as follows:

<u>Jurisdiction</u>	<u>Date Adopted</u>	<u>Ordinance/Resolution Number</u>
City of Union Gap	February 8, 2010	2660

MEASURABLE ACTIVITIES

1. City of Union Gap will review construction project plans that require post-construction stormwater BMPs identified in the ordinance adopted in S5.B.5.a of the permit.
2. City of Union Gap will conduct annual training sessions for post-construction plan review staff as needed, depending on staff turnover.

ASSESSMENT

1. Record the number of post-construction stormwater control plans received, reviewed and approved/disapproved by staff.
2. Document training events. Include dates, names of employees in attendance, activity/course description, and location.

ACCOMPLISHMENTS

- Number of post-construction site plans reviewed and approved in 2022.

	<u>Plans Reviewed</u>	<u>Plans Approved</u>
Union Gap	7	7

- City of Union Gap did 7 qualifying private post-construction BMP's that required inspection.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. Water quality should improve over time as code enforcement personnel contact potential violators, public education messages highlight the new requirement and that proper BMP facilities are selected and designed correctly as a result of the ordinance.

PERFORMANCE MEASURE

S5.B.5. Continue Post-Construction Site Inspections

GOAL

Inspect sites discharging to the MS4 to ensure appropriate post-construction BMPs are installed and functioning correctly.

EXISTING ACTIVITIES

City of Union Gap has established a construction inspection program. Inspector visits each construction site during active phases of public improvements and private development to record the activities conducted at the site and to ensure construction is completed according to approved plans. program exists for follow-up once construction is completed.

Public complaints for flooding and water quality are routed to the Yakima County Flood Control Zone District (FCZD), city public works, or wastewater departments. Response generally consists of a site visit to view the problem and check for physical obstruction, blockage or source control needs to resolve the complaint.

MEASURABLE ACTIVITIES

1. City of Union Gap will inspect post-construction BMP sites that discharge to the MS4 to ensure that BMPs are installed in accordance with approved plans.
2. City of Union Gap will inspect newly constructed and existing BMPs that discharge to the MS4 to ensure they are performing as designed.
3. The City of Union Gap will provide training to post-construction site inspectors including BMP types and functions.

ASSESSMENT

1. Record the number of post-construction stormwater control site inspections performed by staff.

ACCOMPLISHMENTS

- Number of post-construction site inspections in 2022:

Site Inspected

City of Union Gap 7

Private post construction BMPs are required to retain the 25-year storm event and do not discharge to the public MS4. Sites are inspected during rain events to ensure compliance. Public post construction BMPs are inspected during construction to ensure that they are constructed in accordance with design.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. The procedure and training should help inspectors assure projects are compliant with the ordinance during inspections. The inspections should help resolve any deficiencies in BMP installation improving water quality by providing for adequate treatment and flow control.

PERFORMANCE MEASURE

S5.B.4 Provide Post-Construction Training Information

GOAL

Gather and provide information on training opportunities applicable to the proper selection, installation, and maintenance of post-construction stormwater control BMPs.

EXISTING ACTIVITIES

Yakima County provides periodic reports containing training opportunities to the regional permittees. Training information is available on the Regional Stormwater Management website. Training opportunities are also widely available on Ecology's list-serves, via corporate mailings and online.

MEASURABLE ACTIVITIES

1. Yakima County provides a list of post-construction BMP training opportunities on the RSMP website. Sources include the World Wide Web (internet), newsletters, and social media.
2. Regional permittees provide information they receive on training opportunities through professional contacts or other sources.

ASSESSMENT

1. A record of training opportunities are identified and made available.

ACCOMPLISHMENTS

- Training opportunities were made available on the stormwater web site as they became available.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. Training opportunities were regularly visited pages on the Regional Stormwater web site.

2.5 Pollution Prevention & Good Housekeeping for Municipal Operations Program Element

Stormwater discharges from municipal operations conducted by public agencies with permitted MS4's are regulated under the Eastern Washington Phase II NPDES Stormwater Permit.

2.5.1 Permit Requirements for Pollution Prevention and Good Housekeeping

Regulated communities must continue implementation of MS4 O&M plan; inspect stormwater treatment and flow control facilities every two years; conduct spot checks after storm events; conduct O&M and SWPPP requirements for municipal lands and facilities; and train staff.

2.5.2 Supporting Program Elements

Additional performance measures that partially address this program element include detecting and eliminating illicit discharges to the storm drain systems described above in Section 2.3.

Some key municipal facilities are already required to develop SWPPP plans for compliance with the Washington Department of Ecology Industrial Stormwater General Permit.

2.5.3 Performance Measures

PERFORMANCE MEASURE

<i>S5.B.6 Follow O&M Plans at Municipal Facilities</i>

GOAL

Perform activities identified in existing Operation and Maintenance Plans (O&M Plans) for designated co-permittee facilities.

EXISTING ACTIVITIES

City of Union Gap's Public Works Department continues its catch basin cleaning and street sweeping programs as the basic element of the pollution prevention and good housekeeping for municipal operations.

MEASURABLE ACTIVITIES

1. City of Union Gap will perform activities identified in O&M plans for municipal facilities.

ASSESSMENT

1. Record O&M Plan implementation and monitoring of activities or operations that potentially impact stormwater quality.

ACCOMPLISHMENTS

- O&M plans were followed in accordance with O&M manuals developed.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. It is anticipated that implementation of the practices identified in the O&M plans will improve water quality discharged from the MS4.

<i>S5.B.6.ii.c Spot Check MS4s Following >25 Year Events</i>
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GOAL

Conduct infrastructure spot checks following storm runoff events following larger storms that may damage the MS4.

EXISTING ACTIVITIES

City of Union Gap has an ongoing responses to major runoff and flood events.

MEASURABLE ACTIVITIES

City of Union Gap will perform activities identified in the O&M plan for municipal facilities.

ASSESSMENT

Record O&M Plan implementation and monitoring activities or operations that potentially impact stormwater quality.

ACCOMPLISHMENTS

- O&M plans were followed in accordance with O&M manuals developed for regional municipal facilities.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. It is anticipated that implementation of the practices identified in the O&M plans will improve water quality discharge from the MS4.

<i>S5.B.6 Spot Check MS4s Following >25 year events</i>

GOAL

Conduct infrastructure spot checks following storm runoff events following larger storms that may damage the MS4.

EXISTING ACTIVITIES

The City of Union Gap has an ongoing responses to major runoff and flood events.

MEASURABLE ACTIVITIES

1. City of Union employees that require training.
2. City of Union Gap will collect inspection reports and compile it for the annual permit report.

ASSESSMENT

1. Retain inspection forms.
2. Report results of inspections and repairs made.

ACCOMPLISHMENTS

- No event equal to or greater than the 25-year, 24-hour event was recorded in 2022.

APPROPRIATENESS

This Performance Measure is a permit requirement and is included in the SWMP. Spot inspections are an effective method to assess any damage to stormwater flow control an treatment facilities after large storm events.

2.6 Monitoring and Program Evaluation Element

The Monitoring and Assessment portion of the permit consists of two sections: Stormwater Management Program Effectiveness Studies and Reporting.

Stormwater Management Program Effectiveness studies are studies designed to evaluate the effectiveness of permit-required stormwater management program elements, activities, and best management practices were a requirement added to the 2014-2019 cycle of the permit. These studies are selected, proposed, developed, and conducted by the Permittees during each permit cycle. Permittees are required to collaborate with other permittees in the development of these studies. When the studies are completed, the lead entity of each study reports the final results and recommendations for future actions. The results of effectiveness studies are used by Ecology to revise compliance requirements and make in future versions of the permit. Permittees are required to report on effectiveness study activities with each Annual Report.

2.6.1 Permit Requirements for Monitoring and Program Evaluation

Ecology does not require permittees to collect water samples during the term of the current permit unless they are characterizing an illicit discharge or complying with a TMDL. Annual reports must include a description of any sampling conducted. The annual report must also include an assessment of the appropriateness of each component of the SWMP and, if changes are anticipated, why those changes are being implemented. Municipalities must prepare for sampling in the next permit cycle by developing a monitoring plan that identifies two monitoring questions, identifies three outfalls, and identifies at least two BMPs for effectiveness monitoring.

2.6.2 Supporting Program Elements

None to date.

2.6.3 Performance Measures

<i>S8 Monitoring & Assessment Performance Measure</i>
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GOAL

Collect and report water samples in response to illicit discharge investigations and TMDL requirements.

EXISTING ACTIVITIES

No sampling in related programs occurred in 2022.

MEASURABLE ACTIVITIES

1. Continue to participate in implementation of the eight Ecology-approved studies that were selected per Section S8.B in the Eastern Washington Phase II Municipal Stormwater Permit.
2. Coordinate with other Permittees in the Urban Area to plan and being an additional Stormwater Management Program effectiveness study.
3. City of Union Gap will continue to participate in implementing the eight Ecology-approved studies.

ASSESSMENT

1. Conduct the BMP Inspection and Maintenance Effectiveness Study according to the Ecology-approved QAPP.
2. Publish a final report and factsheet following completion of the BMP Inspection and Maintenance Effectiveness Study

ACCOMPLISHMENTS

- City of Union Gap contracted with Osborn Consulting to complete the QAPP.

APPROPRIATENESS

This performance measure is a permit requirement and is included in the SWMP. Development of the effectiveness studies is generally considered good practice to direct future efforts to ensure stormwater management program elements are effective at improving water quality and cost effective.

GLOSSARY

Best Management Practices (BMPs) – Best management practices are 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 receiving waters.

Maximum Extent Practicable (MEP) – 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.

Measurable Goal – Definable tasks or accomplishments that are associated with a performance measure.

Municipal Separate Storm Sewer System (MS4) – A conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains): (i) owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State Law) having jurisdiction over disposal of wastes, stormwater, or other wastes, including special districts under State Law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States; (ii) designed or used for collecting or conveying stormwater; (iii) which is not a combined sewer; and (iv) which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

National Pollutant Discharge Elimination System (NPDES) - The national program for issuing, modifying, revoking, and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 402, 318, and 405 of the Federal Clean Water Act, for the discharge of pollutants to surface waters of the state from point sources. These permits are referred to as NPDES permits and, in Washington State, are administered by the Washington State Department of Ecology.

New Development – Land disturbing activities, including Class IV general forest practices that are conversions from timber land to other uses; structural development, including construction or installation of a building or other structure; creation of impervious surfaces; and subdivision, short subdivision and binding site plans, as defined and applied in Chapter 58.17 RCW. Projects meeting the definition of redevelopment shall not be considered new development.

Outfall – Means point source as defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges to waters of the State and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels, or other conveyances which connect segments of the same stream or other waters of the State and are used to convey waters of the State.

Performance Measure – An activity performed to implement one of the eight permit program elements.

Point Source – Any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural runoff.

Program Element – One of the eight program components included in Sections S5.B.1 through S5.B.6, S7, and S8 of the Eastern Washington Phase II Municipal Stormwater Permit.

Redevelopment - The replacement or improvement of impervious surfaces on a developed site.

Return Frequency or Recurrence Interval - A statistical term for the average expected time interval between events (e.g., flows, floods, droughts, or rainfall) that equal or exceed given conditions. Recurrence interval can be converted to probability by dividing the return frequency into one year. For example, a 100-year event has a one percent chance of occurring in any given year ($1/100 = 0.01$); a 5-year event has a 20 percent chance ($1/5 = 0.20$) of occurring in any given year.

Runoff - Water that travels across the land surface, or laterally through the ground near the land surface, and discharges to water bodies either directly or through a collection and conveyance system. Runoff includes stormwater and water from other sources (e.g. snowmelt) that travels across the land surface.

Stormwater Pollution Prevention Plan (SWPPP) – A documented plan to implement measures to identify, prevent, and control the contamination of point source discharges of stormwater.

Waters of the State – Those waters as defined as waters of the United States in 40 CFR 122.2 within the geographic boundaries of Washington State and waters of the state as defined in Chapter 90.48 RCW which includes: lakes, rivers, ponds, streams, inland waters, underground waters, salt waters and all other surface waters and water courses within the jurisdiction of the State of Washington.