

# Stormwater Management Program

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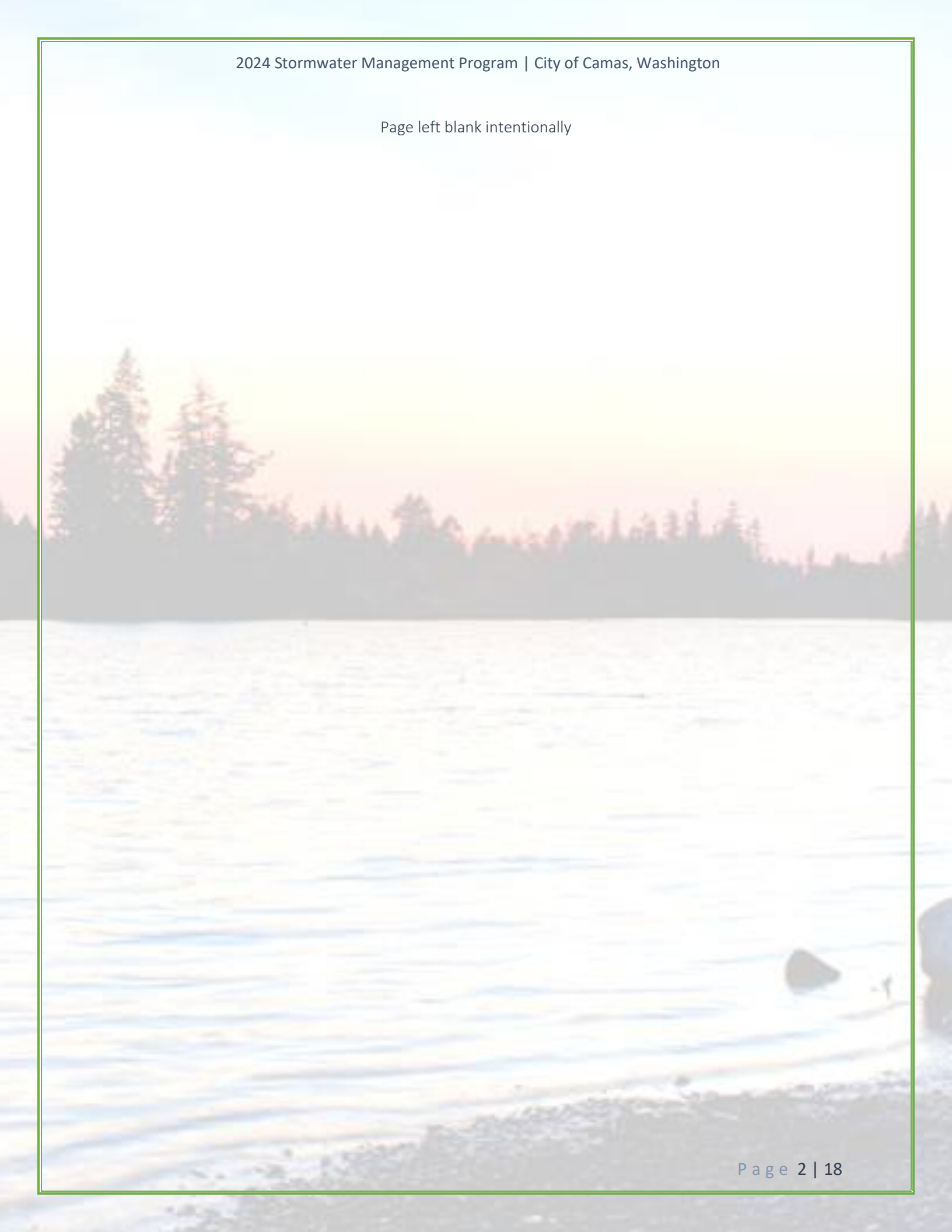
2024

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City of Camas  
Stormwater Division | Public Works



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# Introduction



The National Pollutant Discharge Elimination System (NPDES) Permit (Permit) addresses water pollution from point sources into surface waters, such as rivers, lakes, and streams. The U.S. Environmental Protection Agency (EPA) gave the Washington State Department of Ecology (Ecology) authority to write and issue the NPDES Permit in Washington State. The Western Washington Phase II Municipal Stormwater Permit was first issued by Ecology in 2007.

The City of Camas (City) Municipal Separate Storm Sewer System (MS4) is regulated by the Permit. The Permit was reissued on July 1, 2019 and became effective August 1, 2019. The Permit cycle is from August 1, 2019 to July 1, 2024. The City will continue to implement the current program and include new permit requirements as they come into effect.

The Stormwater Management Program (SWMP) is required per Section S5 of the Permit. The SWMP is organized per the program components listed in S5.C. The SWMP is updated annually and submitted to Ecology by March 31<sup>st</sup> of each year. The SWMP consist of the following components (components, current activities and planned activities are discussed in the SWMP):

- S5.C.1 Stormwater Planning
- S5.C.2 Public Education and Outreach
- S5.C.3 Public Involvement and Participation
- S5.C.4 MS4 Mapping and Documentation
- S5.C.5 Illicit Discharge Detection and Elimination
- S5.C.6 Controlling Runoff from New Development, Redevelopment, and Construction Sites
- S5.C.7 Operations and Maintenance
- S5.C.8 Source Control Program for Existing Development

The SWMP is designed to protect water quality by reducing the discharge of pollutants from the regulated small MS4 to the maximum extent practicable (MEP) and meet state all known, available, and reasonable methods of prevention, control, and treatment (AKART) requirements, and protect water quality.

The City has an ongoing program for gathering, tracking, maintaining and using information to evaluate the SWMP development, implementation, permit compliance, and to set priorities.

The SWMP is a planning and implementation document. The program has three separate objectives depending on the intended audience:

- Ecology – Provide written documentation on how the City will meet the permit requirements for the SWMP.
- The Public – Solicit input and build local support for the City’s SWMP.
- City Staff and Officials – Build support and understanding for the SWMP.

## S5.C.1 Stormwater Planning

The City has three distinct watersheds: the Lacamas Lake Basin, the Columbia River Basin and the Washougal River Basin. The three watersheds ultimately drain into the Pacific Ocean. The City has been rapidly growing since 2015, adding a significant amount of both new people and infrastructure to the City's watersheds. A Comprehensive Stormwater Plan was developed in 2013 to plan for new stormwater regulations and future capital improvements that would help meet the City's goals and growth demands. The Stormwater Planning program is to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.

### **PERMIT REQUIREMENTS (S5.C.1):**

- A. Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program, by August 1, 2020.
- B. Coordination with long-range plan updates:
  - Describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies. The report shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning or taking into account stormwater management needs or limitations.
  - Respond to questions in Annual Report, describe how anticipated stormwater impacts on water quality were addressed, if at all, during 2013-2019 permit term, on or before March 31, 2021.
  - Respond to questions in Annual Report, describe how water quality is being

addressed, if at all, during this permit term, on or before January 1, 2023.

### C. Low impact development code-related requirements:

- Continue to require Low Impact Development (LID) Principles and LID Best Management Practices (BMPs) when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.
- Annually, 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.

### D. Stormwater Management Action Planning:

#### ***Receiving Water Assessment:***

- Document and assess existing information related to the local receiving waters and contributing area conditions to identify which receiving waters are most likely to benefit from stormwater management planning.
- 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. Indicate which receiving waters will be included in the prioritization process. Include a map of the delineated basins with references to the watershed inventory table.
- Identify which basins are expected to have a relatively low Stormwater Management Influence for SMAP. Basins having relatively low expected Stormwater Management

Influence for SMAP do not need to be included in the prioritization process.

**Receiving Water Prioritization:**

- Develop and implement a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SWMP actions, and other land/development management actions (different than the existing new and redevelopment requirements). Document the prioritized and ranked list of receiving waters no later than June 30, 2022.
- Document the priority ranking process used to identify high priority receiving waters. May reference existing local watershed management plan(s) as source(s) of information or rationale for the prioritization.
- The ranking process shall include the identification of high priority catchment area(s) for focus of the SMAP.

**Stormwater Management Action Plan (SMAP):**

No later than March 31, 2023, develop a SMAP for at least one high priority catchment area that identifies all of the following:

- A description of the stormwater facility retrofits needed for the area, including the BMP types and preferred locations.
- Land management/development strategies and/or actions identified for water quality management.
- Targeted, enhanced, or customized implementation of stormwater management actions related to permit sections within S5, including: IDDE field screening, Prioritization of Source Control inspections, O&M inspections or enhanced maintenance, Public Education and Outreach behavior change programs. Identified actions shall support

other specifically identified stormwater management strategies and actions for the basin overall, or for the catchment area in particular.

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

**CURRENT ACTIVITIES (S5.C.1):**

The City's Stormwater Control Ordinance (CMC 14.02) will maintain the requirements for LID Principles and LID BMPs in all developments within city limits.

The City interdisciplinary team will continue to collaborate in the stormwater planning process. The core team members include the Public Works Director, Utilities Manager, Operations Supervisor and Stormwater Permit Manager. Other departments may be involved, as needed. City Council and stakeholders will be notified and part of the decision-making process as planning progresses.

The City completed and submitted their Stormwater Management Action Plan in 2023.

**PLANNED ACTIVITIES (S5.C.1):**

The City's short-term actions in support of stormwater facility retrofits will be detailed feasibility reviews to identify and prioritize retrofit projects for the long-term planning of the SMAP.

The City applied for two Water Quality Combined Funding Grants, the Downtown Regional

Stormwater Retrofit Project, and the Crown Park Regional Stormwater Retrofit Project. These projects were identified via the SMAP process. The grant funds will help the City complete the planning and design phases of the two projects. The projects will provide treatment to stormwater

from 216 acres of largely untreated area. As part of the long-term planning goals proposed in the SMAP, the City has identified the need for a Stormwater Master Plan update and utility rate studies for stormwater.

## S5.C.2 Public Education & Outreach

The City implemented an education and outreach program for the area served by the MS4. The targeted audience is the public which includes schools, contractors, developers, homeowners, material suppliers, and business owners (both public and private). The program is designed to educate the targeted audience on the stormwater problem and provide specific actions they can follow to minimize the problem.

### **PERMIT REQUIREMENTS (S5.C.2):**

Implement an education and outreach program for the area served by the MS4. The program shall be based on local water quality information and target audience characteristics to identify high priority target audiences, subject areas, and/or BMPs.

#### A. General Awareness:

- General Public (including overburden communities, or school age children), or Businesses (including home-based and mobile businesses). Subject areas:
  - 1) General impacts of stormwater on surface waters. Including impacts from impervious surfaces.
  - 2) Low impact development (LID) principles and LID BMPs.
- Engineers, Contractors, Developers, and Land-use Planners. Subject areas:
  - 1) Technical standards for stormwater site and erosion control plans.
  - 2) LID principles and LID BMPs.
  - 3) Stormwater treatment and flow control BMPs/facilities.

- Provide subject area information to the target audience on an ongoing or strategic schedule.

#### B. Behavior Change:

- Residents, Landscapers, Property/Owners, Developers, School age children, or Businesses (including home-based or mobile businesses)

#### ***BMPs:***

- 1) Use and storage of: pesticides, fertilizers, and/or other household chemicals.
- 2) Use and storage of: automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials.
- 3) Prevention of illicit discharges.
- 4) Yard care techniques protective of water quality.
- 5) Carpet cleaning.
- 6) Repair and maintenance BMPs for: vehicles, equipment, and/or home/building.
- 7) Pet waste management and disposal.
- 8) LID Principles and LID BMPs.
- 9) Stormwater facility maintenance, include LID facilities.
- 10) Dumpster and trash compactor maintenance.
- 11) Litter and debris prevention.
- 12) Sediment and erosion control.
- 13) Source Control BMPs.
- 14) Locally-important, municipal stormwater-related subject area.

- Conduct Evaluation of Effectiveness: No later than July 1, 2020, evaluate the effectiveness of an ongoing behavior change campaign.
- By February 1, 2021, follow social marketing practices and methods, similar to community-based social marketing to develop a campaign that is tailored to the community, including development of a program evaluation plan.
  - 1) Develop a strategy and schedule to more effectively implement the existing campaign; or
  - 2) Develop a strategy and schedule to expand the existing campaign to a new target audience or BMPs; or
  - 3) Develop a strategy and schedule for a new target audience and BMP behavior change campaign.
- No later than April 1, 2021, begin to implement the strategy developed.
- No later than March 31, 2024, evaluate and report on:
  - 1) The changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy; and
  - 2) Any planned or recommended changes to the campaign in order to be more effective; describe the strategies and process to achieve the results.
- Use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program.



C. Stewardship: Provide and advertise stewardship opportunities and/or partner with existing organizations (including non-permittees) to encourage residents to participate in activities or events planned and organized within the community.

**CURRENT ACTIVITIES (S5.C.2):**

General Public and General Awareness:

- Participated in tree planting events at WaferTech and along Everett Street
- Maintain stormwater website
- Pet waste management and disposal
- Proper disposal of household hazardous waste
- Prohibit illegal dumping and littering in stormwater facilities
- Illicit discharge hotline and flyer
- KPTV 'Clean Water' public service announcement campaign
- Quarterly stormwater social media posts
- Labeling events at Camas Farmers Market to spread the word on Private Stormwater Facilities, IDDE, Poop Smart, Don't Drip and Drive and other stormwater program activities

Behavior Change:

Pet waste is an ongoing issue in the City. The City evaluated the existing pet waste program and decided to continue to tackle the pet waste issue. The City has joined forces with Clark County and neighboring cities to promote pet waste management with the Canines for Clean Water Campaign. The team developed a behavior change campaign strategy and schedule. The City continues to implement the strategy developed for the pet waste management campaign. The City hands out "There is no poop fairy" signs to residents and HOA's that experience excessive dog poop on lawns and in public spaces.

Stewardships:

- Doody Pledge
- Backyard Habitat Certification Program
- Ivy League
- Lacamas Lake Clean-up
- Student Video Contest

**PLANNED ACTIVITIES (S5.C.2):**

The City will continue to implement the Current Activities.

## C5.C.3 Public Involvement & Participation

Public involvement and participation is important in creating an effective stormwater management program.

### **PERMIT REQUIREMENTS (S5.C.3):**

- A. Create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementing and update of the SMAP and SWAP.
- B. City shall post the SWMP Plan and the annual report on the website, no later than May 31<sup>st</sup> of each year. All other submittals shall be available to the public upon request.

### **CURRENT ACTIVITIES (S5.C.3)**

The City utilizes various communication mediums to convey involvement and participation events to the public, such as: social media, City website, newspaper articles and other web-based channels.

The City posts the latest annual report and Stormwater Management Program (SWMP) on the website by March 31<sup>st</sup> each year. When the updated SWMP is posted on the City's website, a newsfeed is generated to notify the public and request for comments on the SWMP.

The City generates monthly to quarterly stormwater related topics and posts on City's social media to promote education and awareness. A link to the SWMP and SMAP are included in the post to help generate awareness and opportunity for the public to provide comments.

### **PLANNED ACTIVITIES (S5.C.3):**

The City will continue to implement the Current Activities and explore other means of public involvement opportunities. The public was a key stakeholder that we asked for input during the SMAP process. Environmental justice data was





incorporated in the development of the SMAP. The City will continue to incorporate feedback

from stakeholders in SMAP developments and decision making processes.

## S5.C.4 MS4 Mapping and Documentation

The City has an ongoing program for mapping and documentation of the MS4.

other Permittees. Permit does not preclude the City from recovering reasonable costs associated with fulfilling mapping information requests by federally recognized Indian Tribes, municipalities and other Permittees.

### **PERMIT REQUIREMENTS (S5.C.4):**

#### A. Ongoing Mapping of MS4:

- Known MS4 outfalls and known MS4 discharge points.
- Receiving waters, other than groundwater.
- Public stormwater treatment and flow control BMPs/facilities
- Geographic areas that do not discharge stormwater to the surface waters.
- Tributary conveyance to all known outfalls and discharge points with a 24 inch diameter or larger, or an equivalent cross-sectional area for non-pipe system (tributary conveyance type, material, size, associated drainage areas, land use).
- Connections between the MS4 owned or operated by the other municipalities or public entities.
- All connections to the MS4 authorized or allowed by the City after February 16, 2007.

#### B. New Mapping requirements:

- No later than January 1, 2020, begin to collect size and material for all known MS4 outfalls during normal course of business and update records.
- No later than August 1, 2023, complete mapping of all known connections from the MS4 to a privately owned stormwater system.

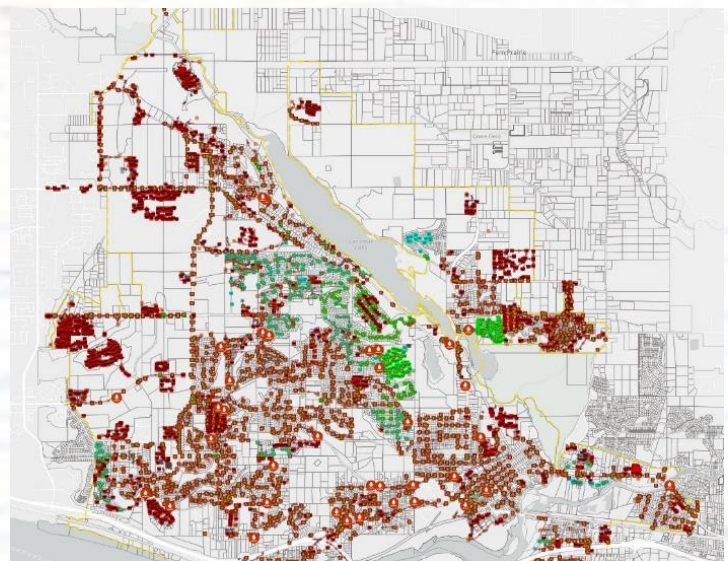
C. No later than August 1, 2021, the required format for mapping is electronic with fully described mapping standards.

D. Upon request, make maps available to Ecology.

E. Upon request, and to the extent appropriate, provide mapping information to federally recognized Indian Tribes, municipalities, and

### **CURRENT ACTIVITIES (S5.C.4):**

The City maintains the MS4 mapping by incorporating record drawing information from new developments and correcting existing features as needed. All known MS4 outfalls (size and material) have been added to the MS4 mapping update as needed. All known connections from the MS4 to privately owned stormwater system have been mapped. Staff are using GPS to add and adjust assets to correct locations. Desktop data entry using as-builts is being conducted to clean up the City's GIS layer. The City MS4 mapping is performed in ArcGIS.



### **PLANNED ACTIVITIES (S5.C.4):**

The City will continue to update and maintain MS4 mapping within ArcGIS.

## S5.C.5 Illicit Discharge and Elimination (IDDE)

Discharges from cities often include waste and wastewater from sources other than stormwater. Illicit discharges are those that enter the public storm system in two ways, (1) by direct connection of wastewater piping to storm lines; or (2) through indirect connections, such as infiltration from cracked wastewater piping, dumping of illicit material into storm drains, or accidental spills that result in wastewater flowing into storm drains.

### **PERMIT REQUIREMENTS (S5.C.5):**

- 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 must be identified through, but not limited to: field screening, inspections, complaints/report, construction inspections, maintenance inspections, source control inspections, and/or monitoring information, as appropriate.
- B. Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- C. Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the MS4 to the maximum extent allowable under state and federal law. The ordinance shall include escalating enforcement procedures and actions.
- D. Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit discharges and illicit connections into the MS4.
- Implement a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns. Complete field screening for an average of 12% of the MS4 each year. Annually track total percentage of the MS4 screened beginning August 1, 2019.
- Provide a publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
  - Ongoing training program for all municipal field staff on identification of an illicit discharge and/or connection, and on proper procedures for reporting and responding to the illicit discharge and/or connection. Provide follow-up training as needed to address changes in procedures, techniques, requirements, or staffing. Document and maintain records of the trainings provided and the staff trained.
- E. Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the MS4.
- Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the City. Procedures shall 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.
  - Procedures for eliminating the discharge, including notification of appropriate authorities and property owners.
- F. Ensure municipal 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. Provide follow-up training as needed to address changes in procedures, techniques, requirements, or

staffing. Document and maintain records of the training provided and the staff trained.

G. Recordkeeping: Track and maintain records of the activities conducted. In the Annual Report, submit data for the illicit discharges, spills and illicit connections including those that were found by, reported to, or investigated by the City during the previous calendar year.

**CURRENT ACTIVITIES (S5.C.5):**

The City’s Illicit Detection and Discharge Elimination Ordinance (CMC 14.04) incorporates the various aspects of the Permit requirements.

The ongoing IDDE program includes procedures for addressing illicit discharges, source tracing, and eliminating the discharge.

The IDDE program continues to educate the public on the harmfulness of improper disposal of waste. An educational IDDE flyer with the hotline number is available to the public at City Hall, the Operations Center, and at tabling events at the Camas Farmers Market. The same information is available on the City’s website where the public can access all year round.

The City maintains a hotline and mobile application (CamasConnect 24/7) that allows citizens to report illicit discharges/connections. Calls/complaints are routed to the appropriate staff. All reports are investigated immediately upon submission.

Outfall inspections are the chosen method for field screening assessment. The City tracks the total percentage of outfalls screened annually since the issuance of this current Permit.

Field staff are trained when first hired and then annually. Records of staff training is documented.

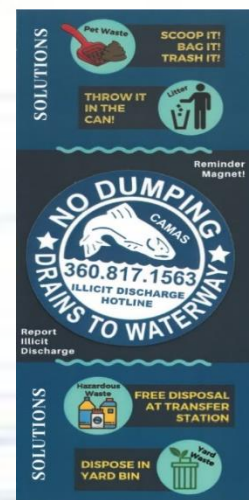
All inspections, investigations, illicit discharges and spill-related activities are tracked in excel spreadsheets and Customer Relationship Management (CRM) Software.



The City completed IDDE reporting data in accordance with the format provided in Appendix 12. The IDDE reporting data will be submitted with the Annual Report.

**PLANNED ACTIVITIES (S5.C.5):**

The City will continue to implement the Current Activities.



## S5.C.6 Controlling Runoff from Development & Construction

The City will implement, and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. The program shall apply to private and public development, including transportation projects.

### **PERMIT REQUIREMENTS (S5.C.6):**

A. Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.

- Adopt and make effective a local program, no later than June 30, 2022, that meets the requirements of Section B [S5.C.6.b(i) through (iii)], below, and shall apply to applications submitted.
  - 1) On or after July 1, 2022.
  - 2) Prior to January 1, 2017, that have not started construction by January 1, 2022.
  - 3) Prior to July 1, 2022, that have not started construction by July 1, 2027.

B. The ordinance shall include, at a minimum:

- The Minimum Requirements, thresholds, and definitions in Appendix 1, or the 2013 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. Such local requirements and thresholds shall provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1.
- The local requirements shall include the following requirements, 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 MEP, and satisfy the State requirements under chapter 90.48 RCW to apply AKART prior to discharge:

- 1) Site planning requirements
- 2) BMP selection criteria
- 3) BMP design criteria
- 4) BMP infeasibility criteria
- 5) LID competing needs criteria
- 6) BMP limitations

- The legal authority, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities that discharge to the MS4.

C. The program shall include a permitting process with plan review, inspection and enforcement capability to meet the standards listed below, for both private and public projects, using qualified personnel. At a minimum, the program shall be applied to all sites that meet the minimum thresholds adopted pursuant to Section B [S5.C.6.b.i].

- Review all stormwater site plans for proposed development activities.
- Inspect, prior to clearing and construction, all known development sites that have a high potential for sediment transport.
- 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 treatment and flow control BMPs/facilities, and catch basins, in new residential developments every six months, until 90% of the lots are constructed (or when construction has stopped and the

site is fully stabilized), to identify maintenance needs and enforce compliance with 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 controls. Verify that a maintenance plan is completed and responsibility for maintenance is assigned. Enforce as necessary based on the inspection.
- Compliance by achieving at least 80% of scheduled inspections.
- Include a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.
- An enforcement strategy shall be developed and implemented to respond to issues of non-compliance.

D. Make available the link to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form and Industrial Stormwater General Permit NOI form. Continue to enforce local ordinances controlling runoff site that are also covered by stormwater permits issued by Ecology.

E. Ensure that municipal staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training must be provided as needed to address changes in procedures and techniques or staffing. Document and maintain records of the training provided and the staff trained.

**CURRENT ACTIVITIES (S5.C.6):**

The City has an ongoing program for the permit process with plan review, inspections and enforcement capabilities. All inspections are documented.

The City's Stormwater Control Ordinance (CMC 14.02) was adopted on February 1, 2010 and revised November 21, 2016, and incorporates the various Permit requirements.

The City adopted (CMC 14.02.050) the latest Stormwater Management Manual for Western Washington (SWMMWW) to help control runoff from developments and construction sites. The requirements, limitations, and criteria of the SWMMWW will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy State AKART.

All applicable field staff are trained in erosion control inspection and have a Certified Erosion and Sediment Control Lead (CESCL) certification.



The City continues to refine the tracking mechanism for inspections and enforcements, development inspection procedures and site plan review standards.

**PLANNED ACTIVITIES (S5.C.6):**

The City will continue to implement the Current Activities.

## S5.C.7 Operations & Maintenance

The City developed and implemented an Operations and Maintenance (O&M) program to regulate and conduct maintenance activities to prevent or reduce stormwater impacts.

### **PERMIT REQUIREMENTS (S5.C.7):**

A. Implement maintenance standards that are as protective, or more protective, of facility function than those specified in the SWMMWW. Maintenance standards shall be developed for facilities that do not have maintenance standards. No later than June 30, 2022, maintenance standards shall be updated to meet Permit requirements.

- Unless there are circumstances beyond the City's control, when an inspection identifies an exceedance of the maintenance standards, maintenance shall be performed:
  1. Within 1 year for typical maintenance of facilities, except catch basins.
  2. Within 6 months for catch basins.
  3. Within 2 years for maintenance that requires capital construction of less than \$25,000.
- For each exceedance of the required timeframe, the Permittee shall document the circumstances and how they were beyond their control.

B. Implement a stormwater facility maintenance program for facilities regulated by the City.

- Implementation of an ordinance or other enforceable mechanism.
- Annual inspections of all private stormwater treatment and flow control BMPs/facilities that discharges to the MS4 and were permitted by the City, including those permitted in accordance with requirements adopted pursuant to the 2007-2019 Permits.
- Compliance with the inspection requirements by achieving at least 80% of required inspections.

- The program shall include a procedure for keeping records, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.

C. Implement a stormwater facility maintenance program for facilities owned or operated by the City.

- Annual inspection of all municipally owned or operated permanent stormwater treatment and flow control facilities, and taking appropriate maintenance actions.
- Spot checks of potentially damaged permanent treatment and flow control facilities after major storm events. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards.
- Inspect all catch basins and inlets owned or operated by the City every two years. Clean catch basins, if the inspection indicates cleaning is needed to comply with maintenance standards established in the SWMMWW.
- Compliance by achieving 95% of required inspections.

D. No later than December 31, 2022, implement and document maintenance practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities under the functional control of the City. Lands owned or maintained by the City include, but are not limited to: streets, parking lots, roads, highways, buildings, parks, open spaces, road right-of-ways, maintenance yards, and stormwater treatment and flow control BMPs/facilities.



**Program shall address the following activities:**

- Pipe cleaning
  - Clean 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 pet waste management
  - Building exterior cleaning and maintenance
- E. Implement an on-going training program for staff whose primary construction, operations, or maintenance job functions may impact stormwater quality. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Document and maintain records of training provided and staff trained.
- F. Implementation of a Stormwater Pollution Prevention Plan (SWPPP) for all heavy

equipment maintenance or storage yards and material storage facilities owned or operated by the City. Update SWPPP no later than December 31, 2022, to include the following information:

- A detailed description of the operational and structural BMPs in use at the facility and a schedule for implementation of additional BMPs when needed.
  - Perform annual inspections of the facility, including visual observations of discharges, to evaluate effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed. The results of the inspections must be documented in an inspection report or check list.
  - 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 would result in an illicit discharge.
- G. Maintain records of inspections and maintenance or repair activities conducted by the City and private property owners.

**CURRENT ACTIVITIES (S5.C.7):**

The Operations storm maintenance crew has an ongoing program to inspect and clean catch basins, and to inspect and maintain public stormwater facilities. Street sweeping is done on a regular basis. There is a list of 'Hot Spots' that are checked after all major storm events.

The City has an ongoing program to inspect private stormwater facilities and coordinate with private owners for maintenance.

The City has an ongoing training program for employees, who encounter stormwater on a regular basis, to learn the importance of protecting water quality.

A SWPPP was developed for the City Operations Center to comply with permit requirements. This is a dynamic document, contents are updated as needed. The SWPPP was updated in December 2022.

The City updated the maintenance standards in June 2022.

The City has partnered with other local jurisdictions to support a Catch Basin Cleaning Assistance Program which allows private owners to pay only \$50 per catch basin cleaning. The program is presented to HOA's and businesses during stormwater facility inspections, Camas Farmers Market and Source Control Inspections



**PLANNED ACTIVITIES (S5.C.7):**

The City will continue to implement the Current Activities and the activity below.

## S5.C.8 Source Control Program for Existing Development

City shall implement a program to prevent and reduce pollutants in runoff from publicly and privately owned institutional, commercial and industrial sites that discharge to the MS4.

**PERMIT REQUIREMENTS (S5.C.8):**

- A. No later than August 1, 2022, adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.
- Applicable operational source control BMPs shall be required for all pollutant generating sources. Structural source control BMPs, or treatment BMPs/facilities, or both, shall be

required for pollutant generating sources if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards because of inadequate stormwater control.

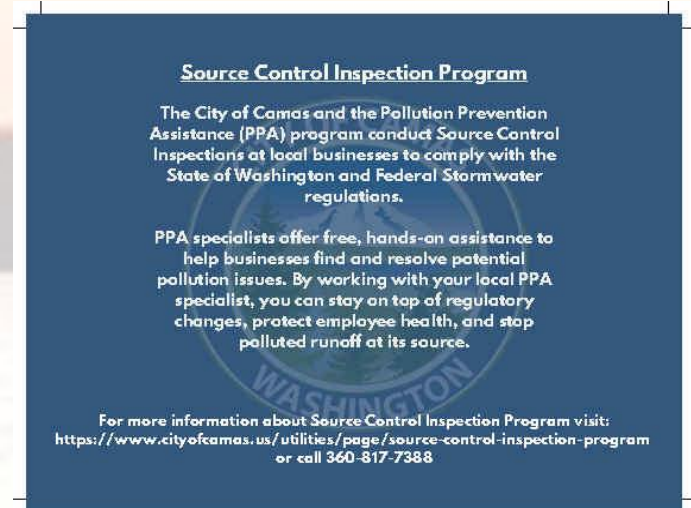
- B. No later than August 1, 2022, establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. The inventory shall include: businesses, home-based businesses and multi-family sites.



- C. No later than January 1, 2023, implement an inspection program for sites identified in the inventory.
- 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.
  - Annually, complete the number of inspections equal to 20% of the businesses and/or site listed in their source control inventory to assess BMP effectiveness and compliance with source control requirements.
  - Inspect 100% of sites identified through credible complaints.
- D. No later than January 1, 2023, implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period.
- E. Ensure municipal staff who are responsible for implementing the source control program are trained 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. Provide follow-up training as needed to address changes in procedures, techniques, requirements, or staff. Document and maintain records of the training provided and the staff trained.

**CURRENT ACTIVITIES (S5.C.8):**

The City has created a Business Inventory List of publicly and privately owned institutional, commercial, and industrial sites in accordance with Appendix 8 of the Permit. The City has adopted a Water Resources Protection ordinance CMC14.04. The City has entered an Interlocal Agreement with Clark County Public Health, Ecology, and Washougal to fund a full-time employee to assist with City source control inspections. Postcards explaining the Source Control Program and a link to the Source Control webpage on City’s website were sent to all businesses on the Business Inventory List.



**PLANNED ACTIVITIES (S5.C.8):**

The City has implemented a business inspection program. City staff will follow up on all public requests for source control issues as well as any follow up issues during initial source control inspections.

## S8 Monitoring & Assessment

All Permittees shall provide, in each annual report, a description of any stormwater monitoring or stormwater-related studies conducted during the

reporting period. If other stormwater monitoring or stormwater-related studies were conducted on behalf of the Permittee during the reporting

period, or if stormwater-related investigations conducted by other entities were reported during the reporting period, a brief description of the type of information gathered or received shall be included in the annual report.

Permittees are not required to provide descriptions of any monitoring, studies, or analyses conducted as part of the Regional Stormwater Monitoring Program (RSMP) in annual reports. If a Permittee conducts independent monitoring in accordance with requirements in [S8.C], annual reporting of

such monitoring must follow the requirements specified in that section.

During the last Permit cycle (2013-2019), the City selected Status and Trend Monitoring [S8.A.2.a] and Effectiveness Studies [S8.B.2.a]. This Permit cycle the City will continue to pay into the annual collective fund to implement monitoring and studies. The payments into the collective fund are due to Ecology annually beginning August 15, 2020. The City's annual contribution for monitoring is \$5,636 and for studies are \$6,977.

## S9 Reporting Requirements

- A. An annual report is required to be submitted no later than March 31<sup>st</sup> of each year of the Permit, beginning in 2020. The report covers the reporting period from January 1<sup>st</sup> through December 31<sup>st</sup> unless otherwise specified.
- B. The City is required to keep all records related to the Permit and the SWMP for at least five (5) years.
- C. All records related to this permit and the City's SWMP shall be available to the public at reasonable times during business hours. A copy of the most recent annual report will be provided to any individual or entity, upon request.
  - A reasonable charge may be assessed for making photocopies of records.
  - City may require reasonable advance notice of intent to review records related to this permit.
- D. The annual report shall include the following:
  - The current Stormwater Management Plan (SWMP);
  - Submittal of the annual report form as provided by Ecology pursuant to S9.A, describing the status of implementation of the requirements of this permit during the reporting period.
- E. No later than March 31<sup>st</sup> of each year, the new annual report and the updated SWMP will be available to the public on the City's webpage at <https://www.cityofcamas.us/publicworks/page/npdes-permit>
  - Attachments to the annual report form including summaries, descriptions, reports, and other information as required, or as applicable, to the requirements of this permit during the reporting period.
  - If applicable, notice that MS4 is relying on another governmental entity to satisfy any of the obligation under this permit.
  - Certification and signature pursuant to G19.D, and notification of any changes to authorization pursuant to G19.C.
  - A notification of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period.