

STORM WATER POLLUTION PREVENTION PLAN
FIR STREET MAINTENANCE FACILITY
CITY OF MT. VERNON

Prepared for
Mt. Vernon Public Works Department
Mt. Vernon, Washington
October 2008

Disclaimer on this Municipal Separate Storm Sewers (MS4) Stormwater Pollution Prevention Plan (SWPPP): At the time of development, the Washington State Department of Ecology (DOE) was not providing guidance on the MS4 SWPPP. Therefore, the following resources were used to assist in the development of this SWPPP: The Industrial Stormwater General Permit, The California Stormwater Quality Association Stormwater Best Management Practice Handbook (January 2003), King County Stormwater Pollution Prevention Manual (January 2005), the City of Port Angeles Public Works and Utilities Maintenance facility ("Corp Yard") Stormwater Pollution Prevention Plan (May 2007) and Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments (October 2004).

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LIST OF ACRONYMS

BMP – Best Management Practice
CB – Catch Basin
CMP – Corrugated Metal Pipe
CWA – Clean Water Act
DEM – Skagit County Department of Emergency Management
EPA – Environmental Protection Agency
MH - Manhole
MS4 – Municipal Separate Stormwater System
NPDES – National Pollutant Discharge Elimination System
OWS – Oil/Water Separator
P2 – Pollution Prevention Team
Phase II Permit - Department of Ecology's Phase II Western Washington Phase II Municipal Stormwater Permit
PVC – Poly vinyl chloride pipe
PWED – Public Works Engineering Division
SPPM - King County Stormwater Pollution Prevention Manual
SWPPP – Stormwater Pollution Prevention Plan
WDOE – Washington State Department of Ecology
WSDOT – Washington State Department of Transportation
WSP – Washington State Patrol

LIST OF DEFINITIONS

The majority of the definitions below come from the Washington Department of Ecology Western Washington Phase II Municipal Stormwater Permit. Definitions not provided from the Permit were taken from other sources, including the Washington Department of Ecology Stormwater Management Manual for Western Washington, EPA NPDES website glossary, and the Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments.

Best Management Practices (BMPs) are the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by the Department that, when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to waters of Washington State..

Combined Sewer means a sewer which has been designed to serve as a sanitary sewer and a storm sewer, and into which inflow is allowed by local ordinances.

Discoloration is a means by which to characterize stormwater. Typically, stormwater is yellowish in color. Discoloration however, other than turbidity, can indicate whether there is rust from iron pipes or iron bacteria, as seen by a yellowish/red color or if paint or cleaning agent emulsions have entered the stormwater system, as indicated by a white cloudy color.

Erosion and Sediment Control BMPs mean BMPs that are intended to prevent erosion and sedimentation, such as preserving natural vegetation, seeding, mulching and matting, plastic covering, and sediment traps and ponds. Erosion sediment control BMPs are synonymous with stabilization and structural BMPs.

Floatables is a means by which to characterize stormwater. A floatable is used as an indicator if very obvious trash or other controllable debris, such as landscaping material, leaf litter, etc has entered into the storm system.

Foam is a means by which to characterize stormwater. Foam is used as an indicator that potentially soap or other cleaning products have entered into the storm system. However, stormwater can often be slightly foamy from pollen and other natural organic material. The way to tell the difference is by touch and smell. If the foam is persistent and accompanied by a fragrant odor, it is most probably coming from a cleaning product. If the suds break up quickly, then it is most likely from turbulence and/or natural conditions.

Hazardous Substance is 1.) Any material that poses a threat to human health and/or the environment. Typical hazardous substances are toxic, corrosive, ignitable, explosive or chemically reactive. 2.) Any substance designated by EPA to be reported if a designated quantity of the substance is spilled in the waters of the United States or is otherwise released into the environment.

Hyperchlorinated means water that contains more than 10 mg/Liter chlorine. Disinfection of water mains and appurtenances requires a chlorine residual of 10 mg/L at the end of the disinfection period. This level is well above the Maximum Residual Disinfectant Level of an annual average of 4 mg/Liter chlorine for potable water.

Illegal Dumping means any intentional and non-permitted disposal of any substance other than stormwater into the municipal separate storm sewer system, unless otherwise called out as an allowed non-stormwater discharge.

Illicit Connection means any man-made conveyance that is connected to a municipal separate storm sewer without a permit, excluding roof drains and other similar type connections. Examples include sanitary sewer

connections, floor drains, channels, pipelines, conduits, inlets or outlets that are connected directly to the municipal separate storm sewer system.

Illicit Discharge means any discharge to the municipal separate storm sewer that is not composed entirely of storm water except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from fire fighting activities.

Industrial Stormwater General Permit (ISGP) means the NPDES Industrial Stormwater General Permit, issued by Ecology for stormwater discharges associated with industrial activities (Issued 2002, modified 2004, effective January 2005).

Material Storage Facilities means an uncovered area where bulk materials (liquid, solid, granular, etc.) are stored in piles, barrels, tanks, bins, crates, or other means.

Municipal Separate Storm Sewer System (MS4) means 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, storm water, 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) means 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 Department of Ecology.

Non-Stormwater Discharges are discharges of process wastewaters, vehicle wash waters, cooling waters, or any other wastewaters associated with the facility into the stormwater collection system. Other discharges must be addressed in a separate NPDES permit. (EPA) See also **Illicit Discharges**. Certain non-stormwater discharges are conditionally approved under the ISGP but are subject to specific provisions, including identifying the location, flow volumes, quality, potential for water quality issues and ability to apply appropriate BMPs. Examples of conditionally approved non-stormwater discharges under an ISGP include:

- Discharges from fire fighting activities;
- Fire protection system flushing, testing, and maintenance;
- Discharges of potable water including water line flushing, provided that water line flushing must be de-chlorinated prior to discharge;
- Uncontaminated air conditioning or compressor condensate;
- Irrigation drainage;
- Uncontaminated ground water or spring water;
- Discharges associated with dewatering of foundations, footing drains, or utility vaults where flows are not contaminated with process materials such as solvents;

Incidental windblown mist from cooling towers that collects on rooftops or areas adjacent to the cooling tower. This does not include intentional discharges from cooling towers such as piped cooling tower blow down or drains

Odor is a means by which to characterize stormwater. Contaminants in stormwater can give off specific odors, which should be described as best as possible. Odors can include rotten eggs, solvent, fuel/oil, cleaning agent, etc. When noting odors, make sure the odor is not related to other sources beyond the runoff being inspected. If gasoline or a flammable solvent is suspected, leave the immediate area, notify facility management immediately and take action to prevent fire or explosion.

Operational source control BMPs are schedules of activities, prohibition of practices, and other managerial practices to prevent or reduce pollutants from entering stormwater. Operational BMPs include formation of a pollution prevention team, good housekeeping, preventative maintenance procedures, spill prevention and clean-up, employee training, inspections of pollutant sources and BMPs, and record keeping. They can also include process changes, raw material/product changes, and recycling wastes.

Outfall means a 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 sewer systems, 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.

Runoff is water that travels across the land surface and discharges to water bodies either directly or through a collection and conveyance system. See also "Stormwater".

Run-on is stormwater runoff from another entity/jurisdiction or another area of the property that is not subject to the provision at issue.

Sediment/Erosion-Sensitive Feature means an area subject to significant degradation due to the effect of construction runoff or areas requiring special protection to prevent erosion.

Sheen is used as an indicator in stormwater flows of petroleum products. Sheen looks like a rainbow hue on the water surface, and is commonly indicative of petroleum products, often present from parking lot runoff.

Significant Material includes, but is not limited to, raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under Section 101 (14) of CERCLA; any chemical the facility is required to report pursuant to Section 313 of Title III of SARA; fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with stormwater discharges.

Source Control BMPs means a structure or operation that is intended to prevent pollutants from coming into contact with stormwater through physical separation of areas or careful management of activities that are sources of pollutants. The Western Washington Stormwater Management Manual separates source control BMPs into two types. *Structural source control BMPs* are physical, structural, or mechanical devices or facilities that are intended to prevent pollutants from entering stormwater. *Operational BMPs* are non-structural practices that prevent or reduce pollutants from entering stormwater.

Spill means a release, either accidental or intentional, of a non-stormwater material.

Stormwater means runoff during and following precipitation and snowmelt events, including surface runoff and drainage.

Stormwater Management Manual for Western Washington means the 5-volume technical manual (Publications Nos. 99-11 through 15 for the 2001 version and Publication Nos. 05-10-029-033 for the 2005

version (The 2005 version replaces the 2001 version)) prepared by Ecology for use by local governments that contains BMPs to prevent, control, or treat pollution in stormwater.

Stormwater Management Program (SWMP) means a set of actions and activities designed to reduce the discharge of pollutants from the regulated small MS4 to the maximum extent practicable and to protect water quality, and comprising the components listed in S5 of S6 of the Western Washington Phase II Municipal Stormwater Permit and any additional actions necessary to meet the requirements of applicable requirements.

Structural source control BMPs are physical, structural, or mechanical devices or facilities that are intended to prevent pollutants from entering stormwater. Structural source control BMPs typically include:

- Enclosing and/or covering the pollutant source (building or other enclosure, a roof over storage and working areas, temporary tarp, etc.).
- Segregating the pollutant source to prevent run-on of stormwater, and to direct only contaminated stormwater to appropriate treatment BMPs.

Treatment BMPs are intended to remove pollutants from stormwater. A few examples of treatment BMPs are Wetponds, oil/water separators, biofiltration swales, and constructed wetlands.

Turbidity is a means by which to characterize stormwater. The dispersion or scattering of light in a liquid, caused by suspended solids and other factors; commonly used as a measure of suspended solids in a liquid.

Vehicle Maintenance or Storage Facility means an uncovered area where any vehicles are regularly washed or maintained, or where at least 10 vehicles are stored.

Water Quality means the chemical, physical, and biological characteristics of water, usually with respect to its suitability for a particular purpose.

Waters of the State includes those waters as defined as “waters of the United States” in 40 CFR Subpart 122.2 within the geographic boundaries of Washington state and “waters of the state” as defined in Chapter 90.48 RCW, which include 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.

STORMWATER POLLUTION PREVENTION PLAN

1. INTRODUCTION

This section provides the background information for this Stormwater Pollution Prevention Plan (SWPPP) including applicable permit requirements and the intended goals and objectives. This section also provides the limitations of this document.

1.1 Background

This Stormwater Pollution Prevention Plan (SWPPP) applies to the City of Mount Vernon's (City) Fir Street Vehicle Maintenance Facility (Facility) located at 401 West Fir Street, Mount Vernon, WA 98273 (See Figure 2-1). This SWPPP identifies actions that Facility staff will take to comply with the terms and conditions of the Department of Ecology's Western Washington Phase II Municipal Stormwater Permit (Phase II Permit). This SWPPP is required to be developed for the Facility under the City's Phase II Permit by February 15, 2010, as listed in under permit condition S5.C.5.i.

As stated in the Phase II Permit condition S5.C.5.i, the following activities are required:

- Implement non-structural Best Management Practices (BMPs) immediately after the SWPPP is developed or updated.
- Include a schedule for implementation of structural BMPs.
- Inspect effectiveness of BMPs periodically.
- The permit does not require monitoring in general for the SWPPP. However, this SWPPP calls for periodic visual inspections during wet and dry conditions
- Update SWPPP on an annual basis and when major BMP and/or administrative role revisions occur

1.2 Goals and Objectives

This SWPPP is intended to satisfy the following goals:

- Implement and maintain Best Management Practices (BMPs) that identify, reduce, eliminate, and/or prevent the discharge of stormwater pollutants
- Prevent violations of surface water quality, ground water quality, or sediment management standards; and
- Eliminate the discharges of unpermitted process wastewater, domestic wastewater, non-contact cooling water, and other illicit discharges to stormwater drainage systems.

Given these goals, the specific objectives which this SWPPP intends to satisfy include the following:

- Identify potential sources of stormwater pollution that may affect the quality of stormwater discharges associated with the Facility
- Evaluate the potential for stormwater contamination from the identified potential sources
- Identify the stormwater BMPs that will be used at the Facility for the prevention and control of pollutants in stormwater discharges and
- Identify operations, maintenance, inspections and record keeping needed for these BMPs

This SWPPP will be reviewed by the Pollution Prevention (P2) Team annually to ensure that the elements of the plan are effective. The P2 team is discussed in detail in Section 3.2. Modifications to the SWPPP will be made on an annual basis and on an as needed basis to reflect changing conditions at the Facility, such as new or differing operations, facility modifications, and BMPs. Appendix E contains the SWPPP Revision Form, which will be completed when revisions are conducted.

1.3 Limitations

Because SWPPPs are a new requirement for maintenance facilities, there are no specific templates for municipal facility plans. Additionally, at the time of development, the Washington State Department of Ecology (DOE) was not providing guidance on the MS4 SWPPP. Therefore, the following resources were used to assist in the development of this SWPPP:

- The Industrial Stormwater General Permit
- The California Stormwater Quality Association Stormwater Best Management Practice Handbook (January 2003)
- King County Stormwater pollution Prevention Manual (January 2005)
- The City of Port Angeles Public Works and Utilities Maintenance facility (“Corp Yard”) Stormwater Pollution Prevention Plan (May 2007) &
- Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments (October 2004).

This SWPPP is intended to meet requirements of the Permit while also providing a user friendly document. The Appendices of this document contain the most relevant information for municipal staff work with the boundaries of the maintenance facility. The document itself contains useful information for those in charge of administrating and keeping records of implementation of the plan.

STORMWATER POLLUTION PREVENTION PLAN

2. FACILITY ASSESSMENT

This section provides an overview of the Facility and operations, general Facility drainage pathways, including figures providing a vicinity map and Maintenance Facility map, a description of Maintenance Facility activities and materials stored onsite.

2.1 Overview of Facility and Operations

The City's Fir Street Facility is located at 401 W. Fir Street and encompasses a rectangular area of approximately 6 acres accommodating a variety of Public Works buildings and activities, including vehicle maintenance activities (see Figure 2-1). Figure 2-1 provides a Vicinity Map of the area and was created using the City's existing GIS and 2 site visits. Approximately 2 acres of the southern portion of the Facility are paved, whereas the remaining 3.9 in the northern portion are unpaved.

The Facility is owned by the City of Mt. Vernon and is bordered by a secured fence and one main entry point that is locked after business hours. There is an additional exit that is used for yard waste crew at the North end of the property.

This Facility serves multiple functions for the City's Public Works Department, including:

- Streets Division, which operates and maintains the streets, storm drain and sanitary sewer collections systems of the City
- Equipment Maintenance Division, which maintains the City's equipment fleet
- Solid Waste Division, whose responsibilities include the collection and disposal of all municipal solid waste/garbage, and operation of yard waste
- Surface Water Utility Division, which work with stormwater conveyance and flood control facilities
- Wastewater Utility Division, which works with wastewater conveyance and treatment

2.2 Facility Drainage

The Facility, as shown in Figure 2-2, is served by both the City's Municipal Separate Stormwater System (MS4) and sanitary sewer system. The site contains a total of ten catch basins (three storm and seven sewer), one Oil/Water separator (OWS) and one open ditch. *Figure 2-2* shows an estimate of the boundary between storm and sewer systems and the location of the storm and sewer catch basins, based on two site visits. Figure 2-2 was developed using the City's GIS data and information gathered during site visits. The potential sources of stormwater contaminants are discussed in Section 3.

The drainage area of this Facility is relatively flat and bounded by the Washington State Department of Transportation (WSDOT) I-5 right of way and associated drainage system to the West. There are three outfalls whose drainage directly enters the WSDOT system. The most southerly outfall receives runoff water from the paved area, primarily from roofs of the garage/wash bay and the streets department buildings. Prior to draining to the outfall, water is collected through a small stormwater conveyance system containing three catch basins. Catch Basins 2 and 3 (CB2 and CB3) respectively, drain into Catch Basin 1 (CB1), which subsequently drains into the WSDOT ditch, located west of the property.

Two outfalls receives runoff from the unpaved portion in the northern part of the property, and receive runoff water primarily from the miscellaneous storage area and from the open ditch which runs through the northern part of the yard, splitting off at the gravel mounds.

Kulshan Creek flows under the facility in a large pipe and passes through the large pump station onsite before daylighting on the west side of I-5 into the Skagit River.

The remainder enters the City's sanitary sewer system, flowing predominantly northbound, to a sanitary pump station located at the northern edge of the property.

A variety of maintenance materials are stored on-site, including sewer pipes, new dumpsters, refuse and scrap metal bins, miscellaneous materials and material stock piles. A detailed list of these materials which are stored outside can be found in Table 2-3.

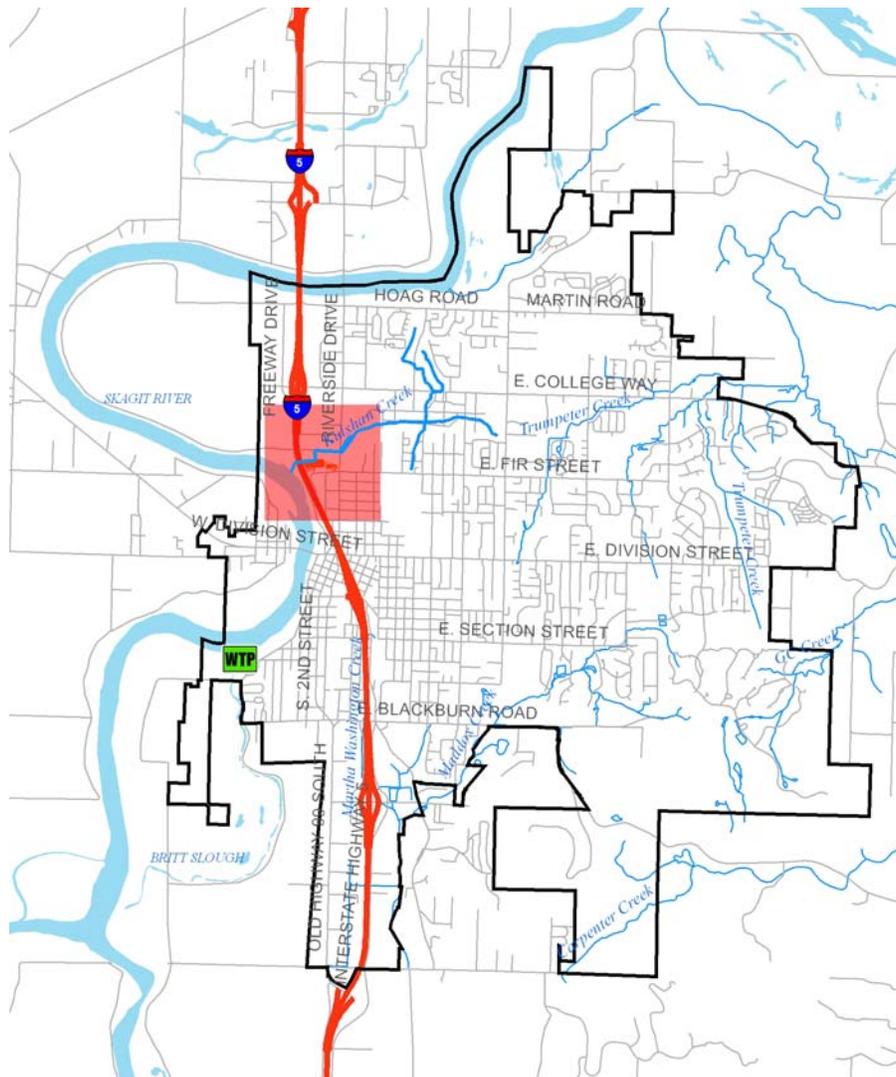


Figure 2-1 Vicinity Area Map

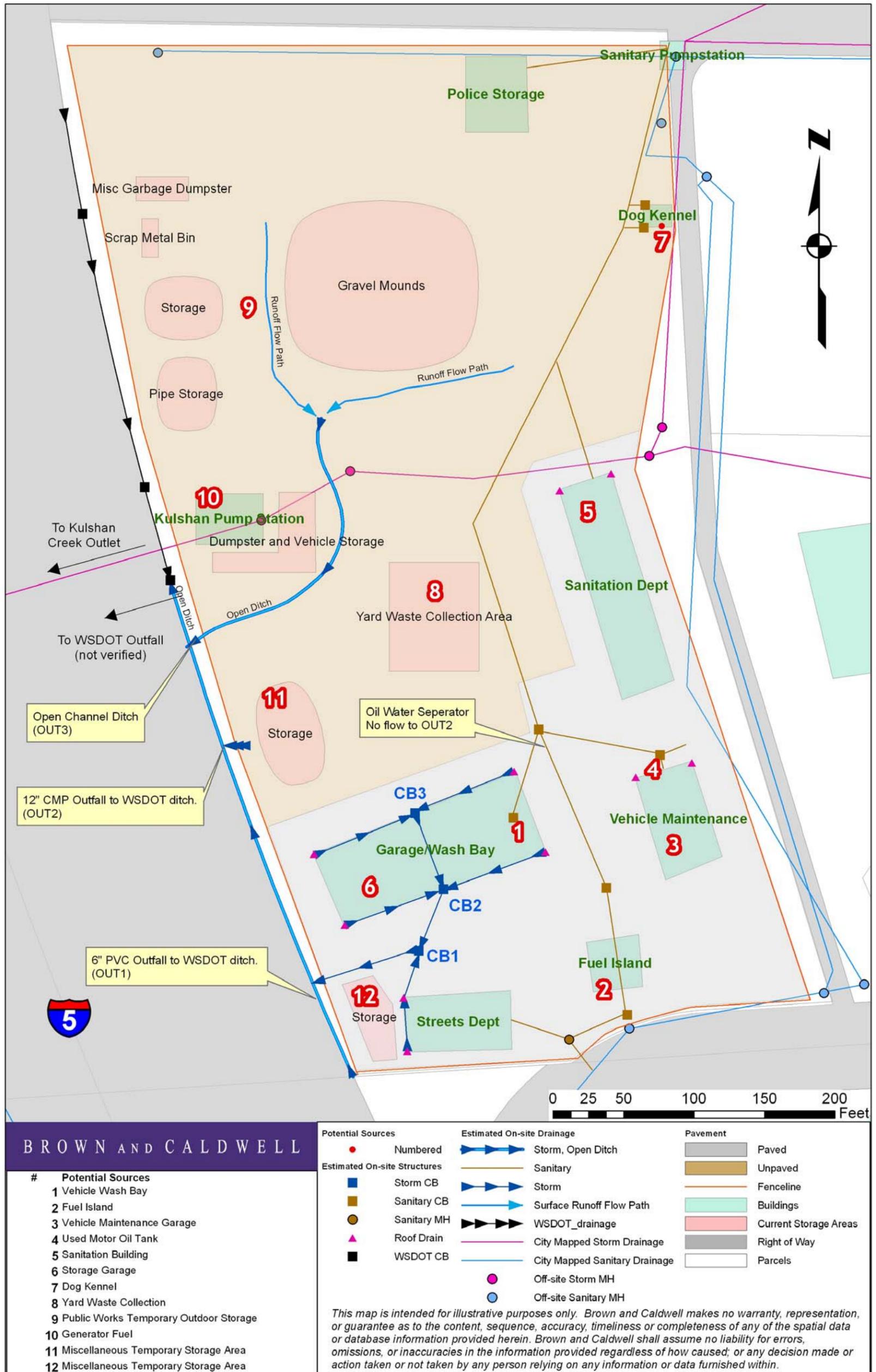


Figure 2-2 Maintenance Facility Map (source: City GIS data and information collected in the field)

2.3 Description of Maintenance Facility Activities

This Facility serves multiple functions for the City's Public Works Department. Many of the activities are performed in areas that drain to sewer and are not part of this plan. Table 2-1 below provides a list of the activities that are conducted in areas that drain to the storm drainage system, along with general locations and potential pollutant effects on stormwater runoff.

Table 2-1 General Facility Activities and their *Potential* Effects on Stormwater

Facility Activity (Activity Sheet Reference from King County BMPs ¹)	Description Facility Activity (Fig. 2-2 Location)	Potential Pollutants in Stormwater Runoff								
		Sediment / Suspended Solids	Nutrients	Metals	Bacteria	Oil & Grease	Organics/HY drocarbons	Pesticides	Oxygen Demanding Substances	Abnormal pH
Storage of Liquid Materials in Stationary Tanks (A2)	A 150-gallon above ground storage tank containing used motor oil is located on the north edge of the Vehicle Maintenance building (Area 4).		X	X		X	X	X	X	X
Storage of Soil, Sand and Other Erodible Materials, including Yard Waste (A4)	On the unpaved areas in the northern section of the site are Gravel Mounds and a Yard Waste Collection Area There is also a Miscellaneous Storage Area west of the Streets Department offices. (Area 8, 9, 11 & 12)	X	X	X					X	X
Storage of Scrap and Recycling Materials (A9)	Storage of salvaged and scrap materials and equipment are found throughout the site, predominantly on the unpaved areas in the northern part of the Facility. This includes a scrap metal bin in the northwest area, abandoned appliances which have been collected and sewer pipes. (Area 8, 9, 11 & 12)	X		X		X	X	X	X	
Painting, Finishing, and Coating of Vehicles, Products, and Equipment (A22)	Paint is stored under the Garage/Wash Bay (Area 6)	X		X		X	X		X	X
Vehicle and Equipment Parking and Storage (A31)	Parking of fleet vehicles happens throughout the site, predominantly on the paved area in the southern portion.	X		X		X	X			
Other activities	Snow removal, paint thinner, and Striping Equipment (Stored in Area 6)	x				x				

¹ King County Stormwater Pollution Prevention Manual, January 2005 Inventory of Significant Materials and Chemicals

2.4 Inventory of Significant Materials and Chemicals

Table 2-2 lists the materials and chemicals that are stored in areas that drain to the storm drainage system and pose a potential threat to stormwater. Quantities were estimated using best engineering judgment. It should be noted that materials are moved around frequently and thus, quantities are constantly changing.

Table 2-2 Materials Exposed or Potentially Exposed to Rainfall/Runoff

List of Exposed Significant Materials	Period of Exposure	Quantity Exposed	Map Location(s)	Method of Storage, Handling and Disposal
Yard Waste	Continuous	3 x 30 yd ³ yard waste dumpsters	Area 8	Dumpsters are emptied as needed
Miscellaneous Drainage & Utility Equipment	Continuous	70 yd ²	Areas 9, 10, 11 & 12	Piles, used when needed
Liquid Asphalt	Continuous	300 gallons	Area 9	Stored in drum on equipment
Garbage Dumpsters	Continuous	0 to 80 dumpsters	Area 9	Stored for rental and removed when rented
Gravel, Sand and Other Material Stockpiles	Continuous	1300 yd ³	Area 9	Stockpiles
Road Maintenance Stockpiles (cold mix, crushed gravel, recycled asphalt)	Continuous	Up to 200 yd ³	Area 9	Stockpiles
Temporary Storage of Sweeping Material	Continuous	100 yd ³	Area 9	Sent to decanter at treatment plant
Garbage Trucks	Continuous	8	Outside of Building 5	Garbage is removed from trucks before parking over night
Miscellaneous Maintenance Vehicles	Continuous	up to 12	Areas 6 & 1	Vehicles are stored under cover

STORMWATER POLLUTION PREVENTION PLAN

3. BEST MANAGEMENT PRACTICES (BMPs)

This section describes Best Management Practices (BMPs) that are currently implemented and required for the site. Tables are provided which list BMPs, current and required, for activities which drain to the storm drainage system. This section also discusses the Pollution Prevention (P2) team, training requirements, and the treatment BMPs currently in place at the site. This section also includes a discussion on BMPs for areas with the facility that drain to the sanitary sewer system.

3.1 Current and Required BMPs for Facility Activities

Stormwater BMPs include structures, activities, or practices which will help prevent or reduce stormwater pollution. The predominant BMP used at the Facility is termed operational source control BMPs, which are activities and practices that are implemented to prevent stormwater pollution. These practices include the following which are discussed in further detail below:

- Performing Good Housekeeping Practices & Preventative Maintenance Actions
- Developing A Pollution Prevention (P2) Team
- Training Staff Annually
- Updating Plan

Good Housekeeping Practices & Preventative Maintenance

Good housekeeping practices include activities designed to prevent or minimize the use of materials that may become stormwater runoff pollutants, as it is better to keep pollutants out of stormwater rather than having to remove them later.

In general, good housekeeping focuses on keeping the Facility area clean and orderly, storing materials under roofs whenever possible, and handling materials and wastes in a manner that minimizes risk and potential pollutant run-on and runoff. A variety of good housekeeping practices have been developed to reduce or eliminate run-on and runoff pollutants from general Facility activities. They are summarized in Table 3-1 below.

Activity	Frequency
Routine Sweeping of Paved Surfaces	As Needed
Periodic Cleanup of Debris and Old Equipment	Quarterly
Removal of Trash and Garbage	On-Going
Routine Inspection for Leaks or Spills	Daily
Waste and Material Minimization Programs	On-Going
Prevention of Bulk Material Stockpiles from Eroding, such as using covers or berms, as applicable.	After use
Preventing Run-on and runoff	On-Going

Table 3-2 shows activities that drain to the storm system and their respective current and recommended BMPs. The specific activity BMPs listed in Tables 3-2 have been adapted from the King County (Municipal) Stormwater Pollution Prevention Plan and are included as separate activity pull-out sheets in Appendix A for ease of use in the field.

In addition, good housekeeping practices include measures to keep contaminated wash water generated by various activities from entering the storm drainage system. Diversion of such water to the sanitary sewer system is an option upon approval by staff managing the sewer system.

Table 3-2 Current and Recommended BMPs¹ for Maintenance Facility Activities which Drain to Storm System

Facility Activity (Activity Sheet)	Location on Figure 2-2	Current BMPs	Recommended BMPs
Storage of Liquid Materials in Stationary Tanks (A2)	6	<ul style="list-style-type: none"> ■ Stored under cover to prevent contact with rain 	<ul style="list-style-type: none"> ■ Place drip pans or absorbent materials beneath all mounted taps and at all potential drip and spill locations during filling and unloading of tanks. ■ Sweep and clean the area as needed. Do not hose down area to storm drain. ■ Check tanks daily for leaks and spills. Replace tanks that are leaking, corroded, or otherwise deteriorating. Collect any spilled liquids and properly dispose of them. ■ Inspect spill control devices regularly to remove separated floatables. ■ Place applicable activity sheet in building for easy reference. ■ Store under roof or other structures as appropriate. ■ Provide primary and secondary containment for dangerous or hazardous materials.
Storage of Soil, Sand and Other Erodible Materials (A4)	8 & 9		<ul style="list-style-type: none"> ■ Spread gravel in unpaved area (currently primarily dirt) to limit site erosion. ■ Armor, line or pave stormwater ditch to limit ditch erosion. ■ Barricade and/or gravel travel surfaces which have high traffic areas. ■ Cover and contain the stockpiles of raw materials to prevent stormwater from running onto the covered piles. Don't hose down the contained stockpile area into storm drain ditch. ■ If stockpile is too large to feasibly be covered and contained, implement an erosion control practice at the perimeter and as needed to prevent erosion and runoff into the storm system. ■ Additional BMPs specific to this activity can be found in Section 2-03 of the City of Mount Vernon's Engineering Standards document. Applicable typical ESC measures include covering measures, perimeter protection, dust control and traffic area stabilization.
Storage of Solid Waste and/or Food Wastes (A8)	8, 9, 11 & 12	<ul style="list-style-type: none"> ■ Waste is removed from slabs daily and dumpsters are emptied as needed 	<ul style="list-style-type: none"> ■ Cover storage containers with leak proof lids or some other means. If waste is not in containers, cover all waste piles (plastic tarps are acceptable coverage) and prevent stormwater run-on and run-off with a berm or similar method. ■ Check storage containers as needed for leaks and ensure that lids are on tightly. ■ Dispose of rinse and wash water from cleaning containers into sanitary sewer system. ■ Repair containers to protect against leaks

Table 3-2 Current and Recommended BMPs¹ for Maintenance Facility Activities which Drain to Storm System

Facility Activity (Activity Sheet)	Location on Figure 2-2	Current BMPs	Recommended BMPs
Storage of Scrap and Drainage Materials (A9)	9, 11 & 12	<ul style="list-style-type: none"> ▪ Materials are typically stored for less than 2 weeks 	<ul style="list-style-type: none"> ▪ Designate an area to drain gasoline, engine fluids, and other contaminated liquids from scrapped items. Dispose and store waste properly, or preferably recycle it, before the items are placed in the scrap storage area. ▪ Drain and transfer fluids from vehicles and other equipment to storage containers only in designated areas located on impervious surfaces or over drip pans. ▪ Check incoming scrap materials and equipment for potential fluid contents and batteries. Always use the designated fluid draining/dismantling area. ▪ All scrap metal removed from equipment or vehicles that may contribute pollutants to surface of water or groundwater due to wash off from rainwater contact must be covered and raised off the ground. ▪ Cover or enclose stockpiles of any material that has the potential to contaminate stormwater runoff. Stockpiled materials must not enter the storm drainage system. ▪ Inspect the storage area regularly to check for contamination from stockpiles or containers. Promptly clean up any leaks, spills, or contamination in the storage area. ▪ Collect and properly dispose of loose scrap and other particles. Do not hose down the area to storm drain. ▪ Store and maintain appropriate spill cleanup materials in a location known to all and ensure that employees are familiar with the spill cleanup procedures.
Painting, Finishing, and Coating of Vehicles, Products, and Equipment (A22)	1, 3, & 6	<ul style="list-style-type: none"> ▪ Activity is conducted indoors ▪ Materials are stored under cover ▪ Spill kits are located in all buildings 	<ul style="list-style-type: none"> ▪ Use ground cloths or other methods to collect dust and debris from sanding operations. Do not hose down the area to the storm drainage system. ▪ For outside work: use ground cloths and/or drip pans in locations where paints are carried and applied. ▪ Store and maintain appropriate spill cleanup materials in a location known to all. Ensure compliance with Federal OSHA regulations. ▪ Sweep the area at the end of each day at a minimum.

Table 3-2 Current and Recommended BMPs¹ for Maintenance Facility Activities which Drain to Storm System

Facility Activity (Activity Sheet)	Location on Figure 2-2	Current BMPs	Recommended BMPs
Vehicle and Equipment Parking and Storage (A31)	Throughout paved area	<ul style="list-style-type: none"> ■ Indoor drains from Sanitation Building flow to sanitary sewer. ■ Storage Garage is covered. ■ Paved area is cleaned by street sweepers daily 	<ul style="list-style-type: none"> ■ Sweep parking areas as needed to collect dirt, waste, and debris. Do not hose down area to the storm drainage system. ■ If washing/pressure washing of the parking areas occurs, the wash water must be collected and discharged to a sanitary sewer system.
	Throughout unpaved area		<ul style="list-style-type: none"> ■ Gravel and dirt lots may require additional BMPs to prevent sediment laden water from leaving site. ■ Since vehicles can track dirt out of the parking and storage areas onto public roadways, basic sediment control may need to be installed if other BMPs do not adequately control sediment laden water from entering stormwater water systems.

¹ King County Stormwater Pollution Prevention Manual, January 2005

3.2 Pollution Prevention (P2) Team

The City has defined members of the Facility Pollution Prevention (P2) Team. The team consists of staff from the various departments responsible for performing the key SWPPP on-site activities. Table 3-3 below lists the P2 members, their contact information and their responsibilities.

Position	Name & Contact Information	Responsibilities
Public Works Engineering Division	Blaine Chesterfield xxx-xxx	Overall coordination and permit compliance
Transportation Operations Manager	Charlie Tewalt xxx-xxx	Oversee cleaning of sewer/storm lines Performs/updates BMPs for automotive maintenance shop, fueling and used fluid management
Equipment Maintenance Supervisor	Gary Owens xxx-xxx	Performs/updates BMPs for OWS Performs SWPPP inspections, SWPPP updates and maintains the SWPPP within office
Health and Sanitation Supervisor	Scott Sutherland xxx-xxx	Performs/updates BMPs for vehicle wash area Performs/updates BMPs for yard management

3.3 Training

A requirement of the Phase II Municipal Stormwater Permit is providing training to the Facility employees whose activities could impact stormwater quality. In 2008, pollution prevention training and IDDE awareness training were provided to all city employees who work at the Facility.

Employee training is an on-going program, and will be provided for all existing employees on an annual basis and for all new employees when they begin work at the Facility. In addition, personnel are to be reminded of the goals and objectives of the SWPPP requirements during the monthly safety training sessions. Training material content will include the information in this SWPPP, such as a review of the Facility map and drainage, current BMPs, spill response procedures and quarterly visual inspection procedures. Appendix D contains the Annual SWPPP Employee Training Form, which should be completed as trainings are conducted.

3.4 Treatment BMPs

In addition to the operational source control BMPs, there is currently an OWS in place which collects water from the Garage/Wash Bay (Areas 6 & 1), the Fuel Island (Area 2) and the Vehicle Maintenance Shed (Areas 3 and 4). Water from the OWS drains into the sanitary sewer system and is cleaned annually.

3.5 Sanitary Sewer Drainage Considerations

Although this SWPPP focuses primarily on BMPs for protecting stormwater quality, the following two sections address BMPs that should be considered for those activities which drain into the sanitary system. Table 3-4 shows the activities conducted at the Facility that drain to the sanitary sewer system. Also shown are the areas where these activities are occurring at the Facility along with their potential pollutants that could be in the runoff. Section 3.6 recommends BMPs to address these activities.

Table 3-4 General Facility Activities which Drain to the Sanitary Sewer System and Potential Pollutants in their Runoff

Facility Activity (Activity Sheet Reference from King County BMPs ¹)	Description Facility Activity (Fig. 2-2 Location)	Potential Pollutants in their Runoff								
		Sediment / Suspended Solids	Nutrients	Metals	Bacteria	Oil & Grease	Organics/Hy drocarbons	Pesticides	Oxygen Demanding Substances	Abnormal pH
Vehicle Washing and Steam Cleaning (A13)	Vehicle washing for 400+ city vehicles of all types occurs at the Garage/Wash Bay, which is covered, paved and drains to the sanitary sewer system. (Area 1)	X	X	X		X	X	X	X	X
Fueling Operations (A17)	Fueling is conducted at the Fuel Island on the south side of the Facility via an underground storage tank. It is covered, paved, and drains to the sanitary sewer system. In addition there is a berm located on the south side. (Area 2)			X		X	X		X	
Engine Repair and Maintenance (A18)	At the Vehicle Maintenance building maintenance is conducted on 400+ city vehicles of all types. A solvent tank, antifreeze supply and used batteries are stored. It is covered, paved and drains to the sanitary sewer system. (Area 3)	X		X		X	X		X	X
Storage of Liquid Materials in Portable Containers (A3)	Typical motor repair liquids are stored inside shop. This area drains to the sanitary sewer system. (Area 3)		X	X		X	X	X	X	X
Dog Kennel (A34)	On the northwest side of the facility is a small dog kennel used for stray dogs. This area drains to the sanitary sewer system. (Area 7)	X			X				X	

¹ King County Stormwater Pollution Prevention Manual, January 2005

3.6 Sanitary Sewer BMP Consideration

Although the area that drains to the sewer is not covered under this document, there are several BMPs that could easily be conducted to help prevent water pollution and heavy loadings to the Wastewater Treatment Plant (WWTP). Table 3-3 lists the current and recommended BMPs for the activities which drain to the sanitary sewer system.

Table 3-3 Current and Recommended BMPs for Maintenance Facility Activities which Drain to Sanitary Sewer System¹

Activity	Location on Figure 2-2	Current BMPs	Recommended BMPs
Vehicle Washing and Steam Cleaning (A13)	1	<ul style="list-style-type: none"> ▪ Area is covered and paved ▪ In-sloped wash bay ▪ Catch Basins are cleaned annually 	<ul style="list-style-type: none"> ▪ Store all wash chemicals under cover. ▪ Handle chemicals in areas that flow to sanitary sewer system. ▪ Designate wash areas with well marked signs indicating where and how washing must be done.
Fueling Operations (A17)	2	<ul style="list-style-type: none"> ▪ Area is covered and paved ▪ Spill kits are stored and maintained on site. ▪ Annual Spill Response training is conducted to all employees. 	<ul style="list-style-type: none"> ▪ Never hose down the fueling area to storm drains ▪ Post signs to remind employees not to top off the fuel tank when filling.
Engine Repair and Maintenance (A18)	3	<ul style="list-style-type: none"> ▪ Activity is conducted indoors ▪ Used batteries are kept inside covered buildings at all times and picked up every 3 weeks. ▪ Storage of used oil underground then pumped out 	<ul style="list-style-type: none"> ▪ If temporary work is being conducted outside—use tarp, ground cloth, or drip pans beneath the vehicle or equipment to capture all spills and drips. ▪ Employees must be educated on proper handling and disposal of engine fluids. ▪ Spill cleanup material should be stored and maintained in a location know to all. ▪ Employees should be familiar with spill cleanup procedures. ▪ Good housekeeping should be conducted, which includes sweeping area as needed and wiping spills with rags immediately so that chemicals can not get tracked out of the garage.

Table 3-3 Current and Recommended BMPs for Maintenance Facility Activities which Drain to Sanitary Sewer System¹

Activity	Location on Figure 2-2	Current BMPs	Recommended BMPs
Storage of Liquid Materials in Stationary Tanks (A2) & Portable Containers (A3)	3 & 4	<ul style="list-style-type: none"> ▪ Oil from portable containers are kept indoors and emptied to outdoor tank via a sealed pipe through the wall ▪ Outdoor waste oil tank is emptied every 3 weeks ▪ Catch basin downstream has an OWS and flows to sanitary sewer system ▪ Spill kits are stored and maintained on site. 	<ul style="list-style-type: none"> ▪ Place drip pans or absorbent materials beneath all mounted taps and at all potential drip and spill locations during filling and unloading of tanks/containers. ▪ Conduct regular containment/berm inspections ▪ Sweep and clean the area as needed. ▪ Check tanks daily for leaks and spills. Replace tanks that are leaking, corroded, or otherwise deteriorating. Collect all spilled liquids and properly dispose of them. ▪ Inspect spill control devices regularly to remove separated floatables. ▪ Place tight-fitting lids on all containers. ▪ Enclose or cover the containers where they are stored. ▪ Raise containers off the ground by using a spill containment pallet or similar method that has provisions for spill control. ▪ Any collected liquids or soiled absorbent materials must be reused, recycled, or disposed of properly.
Vehicle and Equipment Parking and Storage (A31)	Throughout paved area	<ul style="list-style-type: none"> ▪ Indoor drains from buildings flow to sanitary sewer system. ▪ Storage Garage is covered. ▪ Street sweeping is conducted daily. 	<ul style="list-style-type: none"> ▪ Do not hose down the area to any storm drainage system. ▪ If washing/pressure washing of the parking and storage areas occurs, the wash water must be collected and discharged to a sanitary sewer or other treatment system.
Dog Kennel (A34)	7	<ul style="list-style-type: none"> ▪ Kennel drains flow to sanitary sewer system. 	<ul style="list-style-type: none"> ▪ Regularly sweep and clean animal areas to collect and properly dispose of droppings, uneaten food, and other potential pollutants. ▪ Ensure wash/rinse water drains to sanitary sewer system.

¹ King County Stormwater Pollution Prevention Manual, January 2005

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4. MONITORING (VISUAL INSPECTIONS)

There are no permits or other conditions that prescribe or require stormwater sampling for this Facility. The stormwater BMP monitoring for this facility will rely upon quarterly wet and dry weather visual inspections of discharge quality to indicate obvious or potential problems and an annual BMP evaluation. Coupled with the other BMPs for this Facility, as discussed in Section 3, this approach should be well suited to minimize the potential for adverse conditions on stormwater quality. The two primary purposes of the monitoring are to:

- Assess illicit and non-stormwater discharges and
- Determine if BMPs need maintenance.

4.1 Drainage & Outfall Characteristics

The three outfalls which drain stormwater off-site and have been chosen for the quarterly wet and dry weather visual inspections are: Outfall 1 (OUT1), Outfall 2 (OUT2) and Outfall 3 (OUT3). The locations of these outfalls are shown in Figure 2-2.

OUT1 is a 6” white PVC pipe which drains into the WSDOT ditch and is located west of Area 12. It receives runoff water from the roof drains of the Garage/Wash Bay and the Streets Department Building, the paved areas surrounding this building, and from the Potential Source Area #12-miscellaneous storage area.

OUT2 is a 12” CMP which also drains into the WSDOT ditch and is located west of Area 11. This pipe was originally connected to the OWS, however, the OWS connection is currently plugged with grout and so no flow, except for possible subsurface infiltration, is expected to be seen at this inspection point. If discharge water is seen during the quarterly inspections a follow-up investigation should be performed to determine if there is any illicit connection there may be a connection into this pipe.

OUT3 is located at the end of the open ditch, prior to discharging off-site. This ditch runs throughout the unpaved northern-section of the site and collects runoff from Area 8 (yard waste collection area), 9 (gravel mounds and miscellaneous temporary storage) and 10 (Kulshan pump station).

4.2 Quarterly Wet & Dry Weather Visual Inspections

Inspections of all three outfalls will be performed on a quarterly basis during wet and dry weather conditions. Appendix B contains the Inspection forms. There are a total of eight forms, two for each quarter, one for the wet weather inspection and one for the dry weather inspection. Inspections will be performed by a designated member of the P2 team.

Wet weather inspections means that discharges from the identified outfalls will be assessed during a significant rainfall resulting in visible stormwater runoff and discharges from the site. This rainfall should be approximately 0.1” or more in a 24-hour period, but site conditions and local rainfall patterns should be taken into account so that inspections can begin soon after significant runoff begins. It should be noted that inspections are not required to be conducted outside of regular business hours or during unsafe conditions.

Dry weather inspections should be conducted when no rain has occurred at the Facility for at least 24 hours prior to inspection.

Visual inspections consist of making observations of the visual characteristics of discharges from the outfalls and recording them on the appropriate forms. These observations include recording the absence or presence and degree of the indicators outlined below:

- **Floatables:** Floatables indicate if obvious trash or other controllable debris, such as landscaping material, leaf litter, etc has entered into the storm system.
- **Foam:** Foam indicates that potentially soap or other cleaning products have entered into the storm system. However, stormwater can often be slightly foamy from pollen and other natural organic material. The way to tell the difference is by appearance and smell. If the foam is persistent and accompanied by a fragrant odor, it could be related to a cleaning product. If the suds break up quickly, then it could be from turbulence and/or natural conditions.
- **Sheen:** Sheen, which also looks like a rainbow hue on the water surface, is commonly indicative of petroleum products, often present from parking lot runoff. . If gasoline or a flammable solvent is suspected, leave the immediate area, notify facility management immediately and take action to prevent fire or explosion.
- **Turbidity:** Turbidity, which makes the water appear cloudy, is usually an indication of dirt or sediment in the water.
- **Odor:** Certain contaminants in stormwater can give off specific odors, which should be described as best as possible. Odors can include those similar to rotten eggs, solvent, fuel/oil, cleaning agent, etc. When noting odors, make sure the odor is not related sources other than beyond the runoff being inspected. If gasoline or a flammable solvent is suspected, leave the immediate area, notify the Facility management immediately and take action to prevent fire or explosion. (See spill response procedures in Section 5 of this SWPPP.)
- **Discoloration:** A red/orange color can indicate rust from iron pipes or iron bacteria. Other colors such as white could indicate paint or cleaning agent emulsions.
- **Flow:** Note presence or discharge from each outfall. If flow is present, the approximate discharge rate will be indicated on the inspection form (i.e. < 10gpm or >10 gpm).

4.3 Annual BMP Evaluation

The Annual BMP Evaluation Form, located in Appendix C, will be completed on an annual basis by a member of the P2 team and is intended to assess the current BMPs in place at the Facility. Outcomes from this Evaluation will help to determine if any additional BMPs need to be put in place or if current BMPs should be modified.

4.4 SWPPP Revisions

Appendix E contains the SWPPP Revisions Form, which should be revised whenever the SWPPP is modified, specifically under the following conditions:

- Significant changes occur at the Facility which affect current BMPs and could affect stormwater quality and
- On an annual basis to reflect any administrative changes, including P2 team members

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5. SPILL RESPONSE

This section was adapted from the Spill Response Plan in Section 7 of the City's IDDE Plan. This section describes the procedures that should be taken to notify the correct authority in the case of a spill.

5.1 Spill Response Plan and Emergency Cleanup

This section describes the Facility's Spill Response Plan (SRP). This section can serve as a stand alone document that can help municipal employees understand their responsibilities in the field for characterizing, reporting, eliminating, and cleaning up spills.

5.2 Purpose

The purpose of responding to pollutant spill events is to contain the spill in order to minimize detrimental impacts to the environment and life safety. This SRP is intended for the use by the City of Mount Vernon's Facility employees while conducting field activities at the Facility. Responding properly to spills involves following a set procedure including what to look for to identify spills, how to report spills accurately, and proper notification procedures/protocols..

Spill events should be properly cataloged in a database for the following reasons:

- Support clean-up, mitigation or enforcement measures of the event
- Identify patterns of pollutant releases for which structural (versus housekeeping) BMPs may be necessary
- Analyze pollutant spill events at the Facility and develop solutions to minimize the number and detrimental impacts of these spills (i.e., failures in source control)
- Comply with NPDES Permit requirements

5.3 Initial Response

All employees who work at the Facility should be trained to follow the specified procedures for initial response, clean up, and public involvement. The first and most important consideration when responding to a spill is life safety. Appendix F contains a flow chart of the procedures that should be followed by all municipal employees who come into contact with a spill at the site.

5.3.1 Spill Characterization

Spills can be identified by various means, including observing a spill while working on site or identifying an illicit discharge while conducting a visual inspection. In either case, the employees' first response task is to contact the Mount Vernon Public Works Engineering Division (PWED). Employees should be prepared to answer such following questions from the PWED:

- 1) Where is the spill located?
 - a) Parking lot
 - b) Ditch

- 2) Can you identify properties of the spilled material, such as what it is and what quantity has spilled?
- a) Does the material involved have ANY indication of being hazardous (for example, flammable, corrosive, or dangerous in nature)?
ACTION: *If you can NOT identify the product involved, STOP and follow these procedures:*
 1. Back away from the product
 2. Prevent others from approaching the product
 3. Call the police: #911 and Fire Department at 360-336-6277
 - b) Odor
 - c) Solid or liquid
 - d) Texture (do not touch to make this determination unless it is clearly non-hazardous)
 - e) Water soluble (such as latex paint, soap, milk, concrete, anti-freeze, mud, pool water, dye, etc.)
 - f) Non-water soluble (such as oil, hydraulic fluid, diesel fuel, etc.)
 - g) Can the material be identified by the source?
- 3) Additional information to consider, which could impact and affect response procedures:
- a) What time of day is this spill occurring?
 - b) What are the current and prospective weather conditions?

The ability to answer these questions will assist the PWED in subsequently identifying the appropriate authorities for site cleanup, assessment and evaluation. Based on the situation, the PWED may instruct the first responder on various tasks which could include the following:

5.3.2 Spill Cleanup Responsibilities

The employee may be able to conduct an on-site evaluation and spill containment prior to the PWED or other authorities entering the site.

An employee may conduct spill containment and/or cleanup only if the following conditions are met:

- Without jeopardizing safety, the employee should attempt to evaluate if the material is not a hazardous material
- AND employee considers themselves prepared and trained to respond to the spill
- Employees who are not comfortable responding to the spill should request assistance from PWED

Employees should be trained in spill containment and cleanup. A summarized list of what to do in preparing for the spill containment and cleanup is as follows:

- Ensure proper health and safety gear based on spill type
- Evaluate if you can prevent the spill material from entering the drainage system and/or receiving water body
- If possible, cover the downhill storm drain or use a material to block flow into surface waters

If possible, prior to and during the cleanup procedures, it is advised to photo document the spill. This documentation will help in subsequent spill response assessments.

5.4 Public Works Engineering Division (PWED) Notification Responsibilities

Based on the nature of the spill (material/quantity/location) the PWED will respond accordingly, as described below. The detailed response flow chart, located in Appendix F will be used by all emergency responders.

Several agencies become involved in a spill response depending on the situation. The following gives a brief overview of when certain agencies become involved:

5.4.1 Mount Vernon Fire Department

The Fire Department is contacted when a spill is:

- Beyond the first responder's ability to clean up
- Potentially hazardous

Once the fire department arrives on the scene of a spill, they will make the decision whether or not to call the Skagit County Department of Emergency Management (DEM).

5.4.2 Skagit County Department of Emergency Management (DEM)

Because the City is not equipped to clean up hazardous spills, the City utilizes outside agencies such as DEM, WDOE and other agencies to assist. The *Local Emergency Planning Committee (L.E.P.C.) Hazardous Materials Contingency Plan* (Contingency Plan) has previously served as the City's Spill Response Plan. The DEM is called upon by the first responder when:

- Spill clean up is beyond the capabilities of the fire department
- Spill is hazardous

The Skagit County DEM purpose is to:

- Provide a means to plan for, train, respond to and mitigate effects of hazardous materials incidents in Skagit County.
- Identify local, state, and federal responsibilities for hazardous materials incident response and management, which includes preparation for and response to any incident involving hazardous substances or material which, when uncontrolled may be harmful to people, animals, property or the environment.
- Outline a county on-scene coordination and management system for hazardous materials incidents.
- Identify resources available within and outside the community for hazardous materials incident planning, training, response, cleanup and mitigation.

5.4.3 Washington State Highway Patrol (WSP)

The Washington State Highway Patrol (WSP) is contacted by the first responder when a spill is:

- Believed to enter the City's drainage system from a State Highway or State Highway outfall
- Entering WSDOT drainage system from the City

In accordance with RCW 70.136.030, the WSP has been designated as the hazardous materials incident command agency for all hazardous incidents on state highways including those within the City of Mount Vernon. DEM has been designated Incident Command for the rest of the county.

5.4.4 Washington State Department of Ecology (WDOE)

WDOE is contacted by the first responder when a spill is:

- Considered to be an emergency
- Appearing to pose a threat to public safety or environment
- Hazardous, Flammable, or Unknown
- Over 55 gallons
- Entering surface waters

WDOE is the state agency which is authorized to coordinate and/or perform the cleanup of the spill in an emergency situation. In the situation that the spill event occurs on public property, spill material will be put into abandoned drums by WDOE. When calling WDOE, be prepared to answer the following questions:

- Where is the spill?
- What spilled?
- How much spilled?
- How concentrated is the spilled material?
- Who spilled the material?
- Is anyone cleaning up the spill?
- Are there resource damages (e.g. dead fish or oiled birds)?
- Who is reporting the spill?
- How can we get back to you?

There are four numbers that should be called in the event that a spill requires contacting WDOE:

1. National Response Center: 1-800-424-8802
2. Washington Emergency Management Division: 1-800-258-5990
3. Skagit County Health Department: 360-336-9380
4. WDOE Northwest Regional Office: 425-649-7000

5.4.5 Sewer or Water Utilities

Spill events caused from a sanitary sewer or water main break should be reported immediately to Public Utility District No. 1 or the City's wastewater department.

In the event that a spill is generated from a sewer or water utility break, PWED should be contacted at 360-336-6204. The following should be identified or addressed:

- Water main break flowing into storm drainage system and/or stream
- Sanitary sewer spill entering drainage system and/or water body (stream or lake)

5.4.6 Sewer/Drainage Operations & Maintenance

Sewer/drainage operators should be contacted when a spill:

- Enters the public storm drainage system
- Enters or is within 1,000 feet of a body of water (stream or lake)
- Leaves the public drainage system and is heading for a private system

- Is over 55 gallons

5.4.7 Private Drainage Contractor

Private Drainage contractor (from Yellow Pages™) should be contacted when a spill:

- Originates and is contained in a private drainage system
- Originates on private property, but enters into public drainage system. Private drainage contractor should be called to eliminate the source on the private property while the PWED should also be notified to clean up the public drainage system.
- Originates on public property but enters into private drainage system. The PWED should be notified immediately to eliminate the source and contact the property owner to ask for permission to clean up spill that has entered onto private property. The property owner may elect to contact a private drainage contractor instead.
- Originates from private property and enters within 1,000 feet of a body of water (stream or lake).

5.4.8 Construction Projects

Spills can occur from private and/or public construction sites. The following respective agencies should be called in a spill event:

- **Planning, Community Economic Development Inspection/Code Compliance** office should be notified of spills on private construction.
- **Transportation** office should be notified on spills generated from transportation related project construction
- **Public Works Engineering Division** office should be notified on spills generated from utilities related construction.
- **The Chief of Fire Prevention (Fire Marshall)** shall be notified when any hazardous material spill occurs.

5.5 Spill Response Contact Phone Numbers

Table 5-1 below provides the phone numbers of the listed agencies to be contacted in the event of a spill.

Table 5-1 Spill Response Responsible Matrix Phone Log	
Agency/Department	Phone Number
Mount Vernon Public Work Engineering Division	306-336-6204
Fire Department	360-336-6277
Skagit County DEM	360-428-3250
State Highway Patrol	911
Washington State Department of Ecology	see below
- National Response Center	1-800-424-8802
-Washington Emergency Management Division	1-800-258-5990
-Northwest Regional Office	425-649-7000
Planning, Community Economic Development Inspection/Code Compliance	360-336-6214
Drainage Operations & Maintenance	360-336-6217
Skagit County Health Department	306-336-9380

Agency/Department	Phone Number
Skagit County Public Utilities Department	306-424-7104
Private Drainage Contractors	See Yellow Pages™

5.6 Spill Response Report

The Spill Response Report Form, included in Appendix F, must be completed after each spill event, as it is a requirement of the City's NPDES permit. After each spill, the PWED will properly document the spill on this Spill Response Form and maintain the documentation within the master Spill Response Plan and within this SWPPP.

The documentation will include photographs of the spills, including its source and end locations. Where possible, digital photos should be taken and maintained in an organized location within the computer files of Public Works. The spills location will also be recorded on a map, such as on Figure 2-2.

Depending on the situation, authorities may come to the site to sample the material and the receiving water. Any results obtained from this sampling activity, and subsequent sampling/monitoring events should be kept with the Spill Response documents.

In spill events where the source of the pollutant can't be identified, documentation shall include the location of the most upstream structure in which evidence of the pollutant can be found. This documentation is intended to assist in tracing specific pollutants from recurring events by allowing the responder to continue a search from the last known structure (from a previous spill event) and eventually trace it back to its source.

5.7 List of Past Significant Spills and Leaks

Appendix F also includes the List of Significant Spills and Leaks Form, which should be updated after spills and/or leaks occur. This recorded information will assist in future stormwater pollution prevention techniques and trainings.

5.8 Recordkeeping

All forms completed pursuant to this SWPPP will be maintained for at least 5 years. Maintained documentation will include at least the following forms:

- All Wet and Dry Weather Visual Inspection Forms, located in Appendix B
- The Annual BMP Evaluation, located in Appendix C
- All SWPPP Employee Training forms, located in Appendix D
- The SWPPP Revisions Form, located in Appendix E &
- All Spill Response Reporting Forms, located in Appendix F

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6. REFERENCES

California Stormwater Quality Association Stormwater Best Management Practice Handbook, Municipal. January 2003. Available at the following website: www.camphandbooks.com

Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments by the Center for Watershed Protection and Robert Pitt University of Alabama. October 2004

King County Stormwater Pollution Prevention Manual (SPPM). January 2005. Available at the following website: <http://dnr.metrokc.gov/wlr/dss/sppm.htm>

U.S. Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Glossary. Available at the following website: <http://cfpub.epa.gov/npdes/glossary>

APPENDIX A: BMP ACTIVITIES

This Appendix contains the activity sheets specific to Mt. Vernon's Maintenance Facility, as adapted from King County's Municipal Stormwater Pollution Prevention Program. The following Activity Sheets are enclosed:

- A2: Storage of Liquid Materials in Stationary Tanks
- A3: Storage of Liquid Materials in Portable Containers
- A4: Storage of Soil, Sand, and Other Erodible Materials
- A5: Storage of Pesticides and Fertilizers
- A8: Storage of Solid Waste and Food Wastes (including Cooking Grease)
- A9: Storage of Scrap, Recycling Materials (including Auto Recycling Facilities)
- A13: Vehicle Washing and Steam Cleaning
- A17: Fueling Operations
- A18: Engine Repair and Maintenance
- A22: Painting, Finishing, and Coating of Vehicles, Products and Equipment
- A31: Vehicle and Equipment Parking and Storage
- A34: Keeping Animals in Controlled Areas

APPENDIX B: VISUAL INSPECTION FORMS

This appendix contains the following Visual Inspection Forms:

- Winter Wet Weather Visual Inspection Form-To Be Completed January 1 – March 31
- Spring Wet Weather Visual Inspection Form-To Be Completed April 1 – June 30
- Summer Wet Weather Visual Inspection Form-To Be Completed July 1 – September 30
- Fall Wet Weather Visual Inspection Form-To Be Completed October 1 – December 31
- Winter Dry Weather Visual Inspection Form-To Be Completed January 1 – March 31
- Spring Dry Weather Visual Inspection Form-To Be Completed April 1 – June 30
- Summer Dry Weather Visual Inspection Form-To Be Completed July 1 – September 30
- Fall Dry Weather Visual Inspection Form-To Be Completed October 1 – December 31

APPENDIX C: ANNUAL BMP EVALUATION

This appendix contains the Annual BMP Evaluation Form.

APPENDIX D: ANNUAL SWPPP EMPLOYEE TRAINING

This appendix contains the SWPPP Annual Training Form:

APPENDIX E: SWPPP REVISION FORM

This appendix contains the SWPPP Revision Form:

APPENDIX F: SPILL RESPONSE FORMS

This appendix contains the following:

- Spill Response Flow Chart
- Spill Response Reporting Form
- List of Significant Spills and Leaks