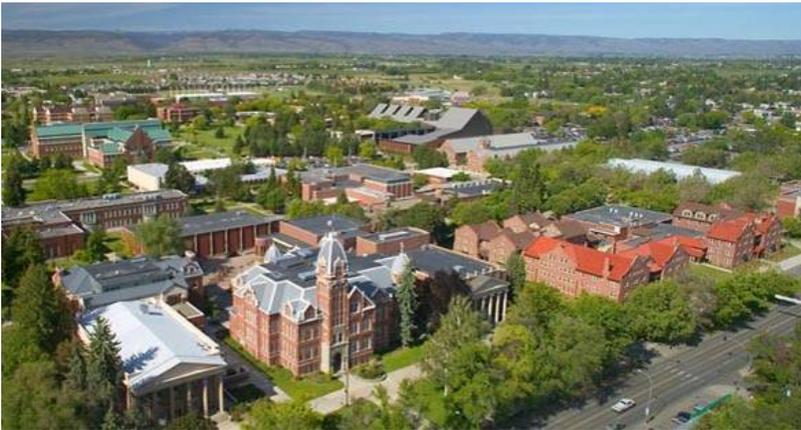


*This 2007 SWMP is an attachment to CWU's 2007 Annual Report to  
the Department of Ecology for its Phase II NPDES Permit*

Central Washington University

## 2007 Stormwater Management Program and Implementation Checklist

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## Section I—Background

### Introduction

The recently issued *National Pollutant Discharge Elimination System and State Waste Discharge General Permit for Discharges from Small Municipal Separate Storm Sewers in Eastern Washington*, hereafter referred to as the Phase II Permit, outlines stormwater program activities and implementation milestones that permittees must follow to comply with the federal Clean Water Act. All Phase II jurisdictions are expected to develop a Stormwater Management Program (SWMP) that includes the required activities, implement those activities within the required timeframes of the permit term, and submit annual reports to the Washington State Department of Ecology (Ecology) by March 31<sup>st</sup> each year to document progress toward complete program implementation.

The Phase II permit was issued by Ecology on January 17, 2007, and became effective on February 16, 2007. The permit covers a five-year period that expires on February 15, 2012. While the actual years of the permit run from February 16 to February 15 of the next year, the reporting requirements cover a calendar year from January 1 to December 31. The permit will be reviewed and renewed for a second, five-year period starting in 2012.

The Phase II Permit automatically applies to cities and counties with populations less than 100,000 located within or partially within a federally designated urbanized area and that operate a municipal separate storm sewer system (MS4) which discharges to a “water” of Washington State (i.e., a river, stream, wetland, etc.). Urbanized areas are defined as population centers with greater than 50,000 people and densities of at least 1,000 people per square mile, and are based on the 2000 census. For future permits, the urbanized area will be based on the most recent federal census.

Ecology also can designate cities with a population of 10,000 or more that are located outside of urbanized areas as additional permittees. Designation criteria can include considerations such as discharge to sensitive waters, high population density, high growth or growth potential, contiguity to an urbanized area, significant contribution of pollutants to waters of the U.S., or ineffective protection of water quality by other programs. The City of Ellensburg (City) has been designated by Ecology as a Phase II permittee based on the Year 2000 census population of approximately 15,400.

As a result of the City’s designation as a Phase II permittee, Ecology subsequently designated Central Washington University (CWU) as a Secondary Permittee with coverage under the Phase II Permit. While the effective date of the Phase II Permit is February 16, 2007, CWU’s official effective date is November 8, 2007 – the date on which CWU was given notification of coverage under the Phase II Permit by Ecology. The geographic extent of coverage under

## Section I—Background

Continued

the permit includes those properties owned and operated by CWU that collect or convey stormwater runoff located within Ellensburg.

Located in the heart of the Kittitas Valley, Central Washington University first opened in 1891 as the State Normal School, focused primarily on the education of teachers. From its founding to its present stature as one of six four-year, state supported, public higher education institutions, CWU has experienced substantial change. The campus has grown from two acres to 380 acres, and become a dominant feature in the urban landscape of the Ellensburg community. In order to address the requirements and deadlines of the NPDES Phase II Permit, CWU has contracted with a local consulting firm to provide stormwater planning services. The stormwater planning project was initiated in June 2007.

### Stormwater Management Program Components

The Phase II Permit is broken down into six components, and the implementation and enforcement of the six components is collectively referred to as a municipality's SWMP. The six components are:

1. Public Education and Outreach
2. Public Participation and Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management for New Development and Redevelopment
6. Pollution Prevention and Good Housekeeping for Municipal Operations

In addition to these six minimum elements, the NPDES II Permit also requires the following:

1. Compliance with stormwater provisions of approved Total Maximum Daily Loads (TMDLs);
2. Monitoring and program evaluation; and
3. Record keeping and annual reporting.

The SWMP is designed to reduce the discharge of pollutants from municipalities to the maximum extent practicable, to satisfy the state requirement to apply "All Known, Available, and Reasonable methods of prevention, control and Treatment" (AKART) prior to discharge, and to protect water quality. The Phase II Permit requires that specified activities from each category above be completed each year in order to achieve full compliance by the end of the first permit term.

## Stormwater Program Planning

As CWU addresses the requirements and deadlines of the NPDES Phase II Permit, it is important that tools be available to help the university know what elements of the permit are due each year and to track the status of what is being successfully implemented. A detailed breakdown (matrices) of required annual NPDES activities is currently being prepared for CWU. The detailed annual listing of required activities, combined with estimates of needed equipment, staffing, and funding, will represent an “Implementation Plan” that CWU can use to track permit elements that are due in any given year and make judgments about the resources needed to meet the requirements. The Implementation Plan matrices will also aid in: (1) tracking program implementation; (2) preparing and updating CWU’s required NPDES Phase II SWMP; and (3) preparing and submitting required annual NPDES Phase II reports to Ecology.

The Implementation Plan to be developed for CWU will represent the culmination of various work and related analyses, and is anticipated to be completed by early 2008. The work conducted as part of this process will include: (1) documentation of CWU’s existing stormwater program activities, services, and levels of funding; (2) a review of current stormwater requirements through a regulatory assessment; and (3) performing a regulatory “gap analysis” to identify enhanced or new activities required for compliance. The process is described further in the following sections.

## Section 2—Summary of Stormwater Program Definition Process

CWU's existing stormwater program has been documented based on various sources of data and information provided by CWU staff. Information provided by CWU included organizational charts, responsibility matrices, annual budgets, staff salaries and benefits, maps, operation and maintenance activities, and other related information. A "stormwater program self-assessment questionnaire form" was also developed and used to establish a baseline understanding of CWU's existing stormwater management activities and priorities. The questionnaire sought information about existing CWU activities related to the regulatory requirements, as well as existing equipment, capital project needs, and estimates of current expenditures. A meeting was held with CWU staff on December 7, 2007 to review and complete the questionnaire form. CWU staff finalized and returned the questionnaire form on January 7, 2008.

Local receiving water issues [303(d) listings, TMDLs, etc.] and other issues that may affect stormwater management requirements were downloaded from various agency sources and reviewed. Additional CWU stormwater program components will be recommended to help comply with any applicable local TMDLs. TMDL related recommendations include activities such as participating in local water quality monitoring activities, providing educational information to the public, and other related activities.

## Section 3—Stormwater Management Program

A stormwater regulatory assessment was conducted based on review of the Phase II Permit, along with guidance provided in the Model Municipal Program for Eastern Washington. Information about CWU's existing stormwater program activities were compared to the regulatory requirements of the permit to identify the "gap" between what is currently being done and what will need to be done each year to ensure compliance with the permit. The results of this analysis served as the basis for the development of written documentation of CWU's SWMP, which is to be submitted with the annual report to Ecology. The following sections describe the actions that CWU has taken, or will take to comply with the requirements of the Phase II Permit.

To aid in tracking permit requirements, this section has been organized into the six components that correspond with the Special Conditions for Secondary Permittees as outlined in the Phase II Permit. Further, each section describes the permit requirements, current CWU activities, and planned actions to be implemented during Year 2 of the permit term. CWU's expected activities over the 5-year permit term are included in the attached detailed annual stormwater program implementation matrices (Appendix A).

It should be noted that Special Conditions S7 (Compliance with TMDLs), S8 (Monitoring and Program Evaluation), and S9 (Reporting and Record Keeping) also apply to permit holders. However, while compliance activities are not required to be included in the SWMP, compliance with S7 and S8 are to be addressed in the annual report to Ecology. The permit and annual reporting requirements for these conditions are described as they relate to the implementation of CWU's overall stormwater program.

In addition, permit conditions, such as Special Conditions S1 through S4 and General Conditions G1 through G21, apply to permit holders, though they do not result in specific program activities, nor is the SWMP required to document compliance with these activities. These additional conditions cover topics such as who is covered by the Phase II Permit; what discharges are authorized under the permit; legal guidelines for transferring, revoking, and appealing the permit; and penalties for non-compliance.

### Public Education and Outreach—Special Condition S6.D.1

#### Regulatory Requirements

CWU must develop and implement a Public Education and Outreach (PE&O) Program aimed at distributing educational material to their students and staff about the impacts of stormwater discharges to water bodies and the steps that can be taken to reduce pollutants in stormwater. CWU's education and outreach information will address the following topics:

- How stormwater runoff affects local waterbodies;
- Proper use and application of pesticides and fertilizers;
- Benefits of using well-adapted vegetation;

## Section 3—Stormwater Management Program

Continued

- Alternative equipment washing practices, including lawnmowers, cars, and trucks, that minimize pollutants in stormwater;
- Benefits of proper vehicle maintenance and alternative transportation choices; proper handling and disposal of wastes, including the location of hazardous waste collection facilities in the area;
- Hazards associated with illicit connections; and
- Benefits of litter control and proper disposal of pet waste.

CWU must also label all their storm drain inlets by the end of the permit term.

### Status of Existing Activities

CWU currently does not perform Public Education and Outreach activities.

### Year 2 Activities

CWU will label 25% of their storm drain inlets as “Drains to Stream” or “Dump no Waste”. CWU may choose to coordinate with the City as the City begins to implement their own PE&O Program to comply with the requirements of the NPDES Phase II Permit.

## Public Involvement and Participation—Special Condition S6.D.2

### Regulatory Requirements

The Public Involvement and Participation (PI&P) activities to be implemented by CWU include publishing a public notice in the local newspaper, soliciting public review of the SWMP, and making the latest version of the SWMP available to the public. All of these items are due in Year 5 of the permit term (required by July 2011).

### Status of Existing Activities

CWU currently does not have a public involvement and participation policy in place.

### Year 2 Activities

There are no requirements for Year 2 of the Permit. It is recommended that the SWMP be posted on CWU's website and be updated annually.

## Illicit Discharge Detection and Elimination—Special Condition S6.D.3

### Regulatory Requirements

CWU must develop, implement, and enforce a program to detect and eliminate illicit discharges into its MS4. This element of the SWMP requires that CWU: (1) develop and adopt appropriate policies that prohibit non-stormwater (illicit) discharges and illegal dumping; (2) develop and implement an enforcement plan to ensure compliance with the

## Section 3—Stormwater Management Program

Continued

illicit discharge policies; (3) develop a map of the MS4, showing the location of all known storm drain outfalls, labeling the receiving waters, and delineating the areas contributing runoff to each outfall; (4) conduct field inspections and visually inspect for illicit discharges at all known outfalls; (5) develop procedures for characterizing illicit discharges, spills, or illegal dumping, and procedures for tracing and removing sources of illicit discharges; (6) develop and implement a spill response plan that includes coordination with a qualified spill responder; (7) provide adequate training for relevant staff; and (8) keep records of inspections and follow-up activities, staff training, and other related items.

### Status of Existing Activities

CWU has a fairly complete map of its MS4, including an inventory of existing storm system facilities and infrastructure. The location of known storm drain outfalls are included on the map, however areas contributing runoff to each outfall need to be delineated. Source tracing and removal activities are limited and conducted on an as-needed basis. CWU has a spill prevention plan that was created in August 1999.

### Year 2 Activities

CWU will adopt and enforce a policy that specifically prohibits non-stormwater (illicit) discharges to its MS4. The staff will comply with all relevant ordinances, rules, and regulations of the City that pertain to non-stormwater discharges. CWU will develop and implement an enforcement plan, including enforcement mechanisms, to ensure compliance with the illicit discharge policy. CWU will also conduct a visual inspection of at least one third of all known outfalls, documenting the status of each outfall. The staff will keep records of inspections and any follow-up activities.

CWU will begin to develop an IDDE Program Plan to address policy enforcement, staff training needs, priority areas, field assessments, complaint handling, discharge characterization methods, hazard assessment, spill response and containment, tracing methods, sampling/analyzing techniques, removal methods, interface with other agencies, and program evaluation methods. The spill prevention plan mentioned above will need to be updated and included as an appendix in the IDDE Program Plan.

## Construction Site Stormwater Runoff Control—Special Condition S6.D.4

### Regulatory Requirements

This element of the SWMP requires that CWU: (1) comply with all ordinances, rules, and regulations of the City that govern construction phase stormwater pollution prevention measures; (2) obtain coverage under the *General NPDES Permit for Stormwater Discharges Associated with Construction Activities* for all applicable construction projects under the control of CWU; (3) coordinate with the City regarding construction projects owned and operated

## Section 3—Stormwater Management Program

Continued

by other entities that have the potential to discharge into CWU's storm drain system to ensure that the City achieves compliance with its own ordinances; (4) provide training to educate appropriate staff in erosion and sediment control best management practices (BMPs) and requirements; and (5) coordinate with Ecology and the City to provide access for inspection of construction sites or other land disturbances during the active grading and/or construction period.

### **Status of Existing Activities**

CWU currently complies with all ordinances, rules, and regulations of the City regarding stormwater through the local building permit process. CWU currently coordinates with Ecology and the City to provide access for inspection of construction sites. CWU now ensures that all construction projects requiring a stormwater permit obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction Activities.

### **Year 2 Activities**

CWU does not have a formal process in place to ensure coordination with the City regarding the use of stormwater pollution prevention measures on construction projects that occur on campus property that are not specifically CWU projects. A formal Memorandum of Understanding (MOU) with the Ellensburg Water Company, the City, and the Washington State Department of Transportation may be the preferred avenue for having formal documentation and notification of construction activities. CWU will provide training to relevant staff to educate them on erosion and sediment control BMPs and requirements.

CWU may begin incorporating the minimum technical requirements for stormwater management listed in Appendix 1 of the NPDES Phase II Permit for new development and redevelopment projects. The City is required to adopt Appendix 1 (or equivalent requirements) into their ordinances by Year 3 to control construction and post-construction stormwater runoff, at which time CWU will have to comply. Becoming familiar with the language and requirements now will ease the transition in Year 3.

## **Post-Construction Stormwater Management for New Development and Redevelopment—Special Condition S6.D.5**

### **Regulatory Requirements**

This element of the SWMP requires that CWU: (1) comply with all ordinances, rules, and regulations of the City that govern post-construction stormwater pollution prevention measures; and (2) coordinate with the City regarding projects owned and operated by other entities that have the potential to discharge into CWU's storm sewer lines to ensure that the City achieves compliance with its own ordinances.

## Section 3—Stormwater Management Program

Continued

### Status of Existing Activities

CWU currently complies with the City's existing ordinance and storm drainage standards which address post-construction stormwater management. However, the City's ordinance and existing standards need to be updated to meet NPDES Phase II requirements. As discussed previously, the City is required to adopt Appendix 1 (or equivalent requirements) as part of their stormwater-related ordinances. CWU will need to incorporate these new/revised post-construction stormwater pollution prevention measures into planned future projects.

### Year 2 Activities

As stated above in the Construction Site Stormwater Runoff Control section, CWU will need to create a formal MOU with the Ellensburg Water Company, the City, and the Washington State Department of Transportation in order to have formal documentation and notification of construction activities that occur within the boundaries of CWU.

## Pollution Prevention and Good Housekeeping for Municipal Operations— Special Condition S6.D.6

### Regulatory Requirements

CWU must develop and implement a municipal operation and maintenance (O&M) plan to minimize stormwater pollution from activities conducted by the university. The O&M Plan shall include appropriate pollution prevention and good housekeeping (PP&GH) procedures for various university operations, activities, and/or facilities (e.g., maintenance associated with stormwater collection and conveyance systems, municipal buildings, parks and open space, vehicle fleets, etc.). The O&M Plan shall include a schedule of inspections and record keeping requirements. CWU must obtain permit coverage for all facilities that are required to be covered under the *General NPDES Permit for Stormwater Discharges Associated with Industrial Activities*. In addition, CWU must develop and implement a formal training program for all staff whose job functions may impact stormwater quality.

### Status of Existing Activities

CWU has an informal street sweeping program in place for campus roads and parking lots. Facilities Management Department staff currently perform catch basin cleaning and other storm system maintenance on a limited basis. University fleet washing and maintenance is currently conducted in a contained building, which likely meets this component of the regulatory requirements. However, these and other existing activities and policies need to be documented in a formal O&M Plan. In addition, numerous other CWU operation and maintenance activities (e.g., parks and open space, university buildings, stormwater management facilities, etc.) need to be examined, and modified as needed, to protect water quality.

## Section 3—Stormwater Management Program

Continued

### Year 2 Activities

CWU will continue to maintain its street sweeping program and perform storm system maintenance and inspections, with proper documentation. CWU will continue to seek coverage under the statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. CWU will also begin developing a good housekeeping plan and schedule (O&M Plan) for municipal operation and maintenance activities aimed at preventing and reducing water quality impacts. A documented training program for all employees whose construction, operations, or maintenance job functions may impact stormwater quality (to be included in the O&M Plan) will begin in Year 2 to address: the importance of protecting water quality; the requirements of the Permit; operation and maintenance requirements; inspection procedures; ways to perform their job activities to prevent or minimize impacts to water quality; and procedures for reporting water quality concerns, including potential illicit discharges. CWU may consider partnering with the City to have a regional decant facility constructed for the management of wastes generated as a result of stormwater maintenance activities (catch basin cleaning, etc.).

### Compliance with Total Maximum Daily Load Allocations

#### Regulatory Requirements

Ecology conducted a review of all TMDLs approved by EPA at the time of the final permit issuance (January 17, 2007) to determine whether stormwater, including municipal stormwater sources, were identified in any of the TMDLs. Ecology did not identify any TMDLs with established load or waste load allocations for municipal stormwater discharges covered under the permit. Since Ecology has not identified any TMDLs with more specific requirements than those found in the NPDES Phase II Permit, compliance with the permit constitutes compliance with applicable TMDLs. However, CWU is encouraged to participate in the development of local TMDLs to ensure that stormwater impacts are responsibly addressed and to help control potential future costs.

### Monitoring and Program Evaluation Requirements

#### Regulatory Requirements

Although water sampling or other testing is not specifically required during the first permit term, CWU must annually report any stormwater monitoring or studies and investigations conducted by, on behalf of, or reported to CWU. CWU must also perform an annual assessment of the appropriateness of the BMPs identified for each SWMP component.

## Section 3—Stormwater Management Program

Continued

### **Status of Existing Activities and Needs**

These requirements will be fulfilled as the SWMP is further developed and implemented. CWU is encouraged to sponsor or participate with local agencies conducting routine or special water-quality studies (e.g., local conservation district) to determine baseline conditions in local area receiving waters.

### **Reporting and Record Keeping Requirements**

#### **Regulatory Requirements**

CWU is required to prepare and submit an annual report to Ecology. The report must include the most current version of CWU's SWMP and status of compliance with the various conditions outlined in the permit. The annual report must include: (1) the status of implementation of each SWMP component; (2) an assessment of CWU's progress in meeting the minimum performance standards; (3) a summary of CWU's evaluation of their SWMP; (4) if applicable, notification that CWU is relying on another governmental agency (e.g., City) to satisfy any of the obligations under the permit; and (5) other reporting requirements.

#### **Status of Existing Activities and Needs**

CWU will need to develop and implement an on-going process for gathering, recording, maintaining, and using information to track the development and implementation of their SWMP. Designated staff will need to itemize the types of record keeping needed for the various program components, meet with various departments to assess needs for new or enhanced processes, create record keeping forms and protocols, and work with staff at various levels to implement the process.

## Section 4—Detailed Annual Stormwater Program Implementation Matrices

A detailed matrix of required annual stormwater activities has been developed for CWU as part of the formal gap analysis process described earlier. For convenience, a summary table has been provided for each of the Phase II Permit requirements and CWU's expected activities over the 5-year permit term (Appendix A). Appendix A is in a check list format to assist CWU in determining what needs to be done for a particular activity in any given year and to track the status of program implementation over time. The check list is meant to be used by CWU staff to help develop the program and track what needs to be done by when on an annual basis.

As discussed earlier, the annual matrices are based primarily upon the final NPDES Phase II General Permit for Eastern Washington. However, professional judgment and experience with similar projects has been used to “fill in the blanks” when necessary, such as describing the intermediate steps necessary to meet regulatory deadlines. The activities in the matrices reflect what NPDES II requires and when, not what CWU may already be doing. In some cases, CWU has already at least partially met NPDES requirements. It should also be pointed out that the schedule developed for the required activities generally reflects the minimum required timeframes (deadlines) for implementation over the 5-year term of the permit. However, some activities will be started in earlier years based on anticipated level-of-effort, expected timeframes, and local preferences.

Appendix A—Annual Stormwater Program  
Implementation Checklist

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
<b>NPDES</b>			
<b>A. General NPDES Requirements</b>			
<b>YEAR 1</b>			
A1. Prepare Notice of Intent (NOI).	CWU prepared and submitted NOI on October 11, 2007.	NOI prepared and submitted.	√
A2. Pay Annual Permit Fee.	CWU - \$2,700	Pay fee.	√
A3. Comply with all relevant ordinances, rules, and regulations of the City of Ellensburg that govern non-stormwater discharges; construction phase stormwater pollution prevention measures; and post-construction stormwater pollution prevention measures, including proper operation and maintenance of the MS4.	CWU to have something in writing and adopted by Board of Trustees. The City will develop and adopt discrete ordinances to comply with NPDES requirements associated with IDDE, construction site stormwater runoff, and post-construction stormwater management. Adoption of ordinances assumed to occur during Year 3.	Create a written policy and formally adopt existing and relevant City ordinances, rules, and regulations.	
<b>YEAR 2</b>			
A2. Pay Annual Permit Fee.	CWU - \$2,700	Pay fee.	
A3. Comply with all relevant ordinances, rules, and regulations of the City of Ellensburg that govern non-stormwater discharges; construction phase stormwater pollution prevention measures; and post-construction stormwater pollution prevention measures, including proper operation and maintenance of the MS4.	CWU to have something in writing and adopted by Board of Trustees. The City will develop and adopt discrete ordinances to comply with NPDES requirements associated with IDDE, construction site stormwater runoff, and post-construction stormwater management. Adoption of ordinances assumed to occur during Year 3.	Track status of City's efforts to develop and adopt discrete stormwater-related ordinances. Update written policy, as necessary.	
<b>YEAR 3</b>			
A2. Pay Annual Permit Fee.	CWU - \$3,500	Pay Fee.	
A3. Comply with all relevant ordinances, rules, and regulations of the City of Ellensburg that govern non-stormwater discharges; construction phase stormwater pollution prevention measures; and post-construction stormwater pollution prevention measures, including proper operation and maintenance of the MS4.	CWU to have something in writing and adopted by Board of Trustees. The City will develop and adopt discrete ordinances to comply with NPDES requirements associated with IDDE, construction site stormwater runoff, and post-construction stormwater management. Adoption of ordinances assumed to occur during Year 3.	Continue to track status of City's efforts to develop and adopt discrete stormwater-related ordinances. Update written policy, as necessary.	
<b>YEAR 4</b>			
A2. Pay Annual Permit Fee.	CWU - \$4,000	Pay Fee.	
A3. Comply with all relevant ordinances, rules, and regulations of the City of Ellensburg that govern non-stormwater discharges; construction phase stormwater pollution prevention measures; and post-construction stormwater pollution prevention measures, including proper operation and maintenance of the MS4.	CWU to have something in writing and adopted by Board of Trustees. Assume City has developed and adopted discrete ordinances to comply with NPDES requirements associated with IDDE, construction site stormwater runoff, and post-construction stormwater management.	Continue to comply with all relevant ordinances, rules, and regulations of the City that pertain to stormwater. Update written policy, as necessary.	
<b>YEAR 5</b>			
A2. Pay Annual Permit Fee.	CWU - \$4,500	Pay Fee.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
<b>NPDES</b>			
<b>B. Public Education and Outreach: Students, staff, etc.</b>			
<b>YEAR 1</b>			
	Note that minimum requirements do not begin until Year 3.		
<b>YEAR 2</b>			
	Note that minimum requirements do not begin until Year 3.		
<b>YEAR 3</b>			
B1. Distribute educational information to students and staff on the impacts of stormwater discharges on receiving waters, and steps that can be taken to reduce pollutants in stormwater runoff. Different combinations of topics shall be addressed each year.	Assume that educational information developed distributed in the form of stormwater brochures. Topics to be covered include: 1) how stormwater runoff affects local waterbodies; 2) proper use and application of pesticides and fertilizers; 3) benefits of using well-adapted vegetation; 4) alternative equip. washing practices that minimize pollutants in stormwater; 5) benefits of proper vehicle maintenance and alternative transportation choices, proper handling and disposal of wastes, including location of hazardous waste collection facilities; 6) hazards associated with illicit connections; and 7) benefits of litter control and proper disposal of pet waste.	Develop and distribute educational information to students and staff with different topic(s) addressed each year.	
B2. Begin labeling storm drain inlets owned and operated by CWU. Storm drain inlets located in maintenance yards, parking lots, along sidewalks, and at pedestrian access points shall be clearly and permanently labeled with the message "Dump No Waste" or similar saying and indicating the point of discharge as a stream, lake, or ground water.	Assume 50% of all storm drain inlets labeled by end of Year 3 and remainder no later than 180 days prior to expiration date of Permit (by Aug 2011). Must also re-label inlets that are no longer clearly visible or easily readable within 90 days. Assume that work to label inlets starts in Year 3 due to relatively few inlets on university property (approx. 235 storm drain inlets).	Label 50% of all storm drain inlets on university property. Maintain records of the location and number of inlets labeled annually.	
<b>YEAR 4</b>			
B1. Distribute educational information to students and staff on the impacts of stormwater discharges on receiving waters, and steps that can be taken to reduce pollutants in stormwater runoff. Different combinations of topics shall be addressed each year.	Assume that educational information developed distributed in the form of stormwater brochures. Topics to be covered include: 1) how stormwater runoff affects local waterbodies; 2) proper use and application of pesticides and fertilizers; 3) benefits of using well-adapted vegetation; 4) alternative equip. washing practices that minimize pollutants in stormwater; 5) benefits of proper vehicle maintenance and alternative transportation choices, proper handling and disposal of wastes, including location of hazardous waste collection facilities; 6) hazards associated with illicit connections; and 7) benefits of litter control and proper disposal of pet waste.	Continue to develop and distribute educational information to students and staff.	
B2. Continue labeling storm drain inlets owned and operated by CWU. Storm drain inlets located in maintenance yards, parking lots, along sidewalks, and at pedestrian access points shall be clearly and permanently labeled with the message "Dump No Waste" or similar saying and indicating the point of discharge as a stream, lake, or ground water.	Assume 50% of all storm drain inlets labeled by end of Year 3 and remainder no later than 180 days prior to expiration date of Permit (by Aug 2011). Must also re-label inlets that are no longer clearly visible or easily readable within 90 days. Assume that work to label inlets starts in Year 3 due to relatively few inlets on university property (approx. 235 storm drain inlets).	Label remaining 50% of storm drain inlets on university property. Maintain records of the location and number of inlets labeled annually.	
<b>YEAR 5</b>			
B1. Continue distributing educational information to students and staff on the impact of stormwater discharges on receiving waters, and steps that can be taken to reduce pollutants in stormwater runoff. Different combinations of topics shall be addressed each year.	Assume that educational information developed distributed in the form of stormwater brochures. Topics to be covered included in Years 3 & 4. Assume some key staff time to review and update public education and outreach activities and/or strategy employed to date.	Review and update public education and outreach activities and/or strategy as needed. Continue to develop and distribute educational information to students and staff.	
B2. Continue labeling storm drain inlets owned and operated by CWU. Storm drain inlets located in maintenance yards, parking lots, along sidewalks, and at pedestrian access points shall be clearly and permanently labeled with the message "Dump No Waste" or similar saying and indicating the point of discharge as a stream, lake, or ground water.	Inlets must be re-labeled within 90 days if they are no longer clearly visible or easily readable. Assume some staff time during Year 5 to periodically inspect labeled inlets and re-label as necessary. Assume 5% of labeled inlets need to be re-labeled on an annual basis.	Periodically inspect labeled storm drain inlets and re-label as necessary. Maintain records of the location and number of inlets re-labeled annually.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
<b>NPDES</b>			
C. Public Involvement and Participation: Solicit public review of stormwater management program via public notification, website posting, etc.			
<b>YEAR 1</b>			
	Note that minimum requirements do not begin until early in Year 5.		
<b>YEAR 2</b>			
	Note that minimum requirements do not begin until early in Year 5.		
<b>YEAR 3</b>			
	Note that minimum requirements do not begin until early in Year 5.		
<b>YEAR 4</b>			
	Note that minimum requirements do not begin until early in Year 5.		
<b>YEAR 5</b>			
C1. Publish a public notice in the local newspaper and solicit public review of the SWMP.	Assume 1 week of supervisor time to write public notice for release to local newspaper and to respond to any phone calls and/or complaints received from the public. Due 180 days prior to expiration date of Permit (by Aug 2011).	Publish a public notice for distribution in local newspaper. Respond to public input received.	
C2. Make the latest updated version of the SWMP available to the public via the CWU website.	Assume costs for coordination and posting of updated SWMP on website. Due 180 days prior to expiration date of Permit (by Aug 2011).	Coordinate with appropriate CWU Dept to post SWMP on website.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List ✓
<b>NPDES</b>			
<b>D. Illicit Discharge Detection and Elimination: Develop, implement, and enforce program to detect and eliminate polluted non-stormwater discharges into the MS4.</b>			
<b>YEAR 1</b>			
D1. Develop and adopt appropriate policies prohibiting illicit discharges and illegal dumping; Identify possible enforcement mechanisms for use in the development of an Enforcement Plan.	The policies shall address, at a minimum: illicit connections; non-stormwater discharges as defined in the Phase II Permit; and spilling, dumping, or otherwise improperly disposing of hazardous materials, pet waste, and litter. Policy must be developed and adopted by Board of Trustees by end of Year 1. Assume some time by staff to investigate and identify possible enforcement mechanisms by the end of Year 1; consider those currently employed by the University for other purposes. Enforcement plan to be developed in Year 2 (by May 2009) and included as part of written IDDE Program Plan.	Create an internal policy for adoption by Board of Trustees. Consider adopting City's or other similar IDDE policy.	
D4. Provide continued staff training or coordinate with existing training efforts to educate relevant staff on proper BMPs for preventing spills and illicit discharges.	Assume that existing trained staff continue to receive annual refresher courses. Training of additional staff must be conducted no later than 180 days prior to expiration date of Permit (by Aug 2011). However, assume that some training of additional staff begins in Year 2 in order to conduct activities related to IDDE Program, including illicit discharge detection, field assessments, tracing methods, spill response, enforcement activities, etc.	Continue to provide staff training through annual refresher courses for those currently trained. Identify additional staff to be trained starting in Year 2.	
<b>YEAR 2</b>			
D1. Develop an Enforcement Plan using the enforcement mechanisms identified during Year 1 to ensure compliance with illicit discharge policies. Enforcement activities to begin in Year 2.	Assume that development of enforcement plan will require staff time, internal coordination, possible consultant assistance, and legal review. Enforcement plan to be developed and implement in Year 2 (by May 2009) and included as part of written IDDE Program Plan.	Develop an enforcement plan consistent with the selected enforcement mechanism(s).	
D2. Begin developing written IDDE Program Plan that addresses enforcement; staff training needs; field assessments; on-campus complaint handling; discharge characterization methods, hazard assessment, and spill response and containment; tracing methods; sampling and analysis techniques; termination/removal methods; interface with local agencies; and program evaluation methods.	Assume that once appropriate policies prohibiting illicit discharges and illegal dumping are approved, enforcement and other related activities are phased-in starting in Year 2. Assume that written guidance is needed for orderly implementation. Assume preparation involves various departments and requires a fair amount of staff time to prepare plan. Funding estimate is only for lead compliance staff. Assume some initial training training course is needed for staff involved in IDDE Program with costs covered under staff education (D4).	Develop IDDE Program Plan using guidance documents from Center for Watershed Protection, Ecology, or others as an aid. Enforcement Plan and existing Spill Response Plan to be included with IDDE Plan. Involve multiple staff as needed. Provide initial training for relevant staff.	
D3. Begin implementation of IDDE Program and enforcement mechanism. CWU staff to conduct field inspections and visually inspect for illicit discharges at 1/3 of all known outfalls that discharge to surface waters.	Field assessments include visual inspection of outfalls during dry weather and documentation of observations and findings consistent with IDDE Program Plan. Assume that some screened outfalls appear suspicious and require follow-up work including the collection of samples, source tracing and removal activities, and possibly enforcement actions consistent with enforcement plan.	Conduct field assessments at 1/3 of all known outfalls and conduct necessary follow-up activities to ensure termination of illicit discharges identified. Keep records of inspections and follow-up activities.	
D4. Provide continued staff training or coordinate with existing training efforts to educate relevant staff on proper BMPs for preventing spills and illicit discharges.	Assume that existing trained staff continue to receive annual refresher courses. Training of additional staff must be conducted no later than 180 days prior to expiration date of Permit (by Aug 2011). However, assume that some training of additional staff begins in Year 2 in order to conduct activities related to IDDE Program, including illicit discharge detection, field assessments, tracing methods, spill response, enforcement activities, etc.	Continue to provide staff training through annual refresher courses for those currently trained. Identify additional staff to be trained and provide appropriate training.	
D5. CWU to complete remaining mapping of storm sewer system (MS4), showing locations of all known storm drain outfalls, labeling receiving waters, and delineating the areas (catchment areas) contributing runoff to each outfall. Include field surveys to verify locations of outfalls and identify previously unknown outfalls.	Note that minimum requirements do not require mapping to be completed until Year 5. However, map of MS4 necessary for staff to conduct visual inspections for illicit discharges during Year 2 as part of field assessment work required under IDDE Program. Assume that CWU has completed approximately 2/3 of required MS4 mapping and some field survey work. Assume that remaining mapping activities and additional field-related activities will be carried out under direction of permit compliance staff during Year 2.	Complete mapping of storm sewer system (MS4).	
<b>YEAR 3</b>			
D2. Complete written IDDE Program Plan started in Year 2 that addresses enforcement; staff training needs; field assessments; on-campus complaint handling; discharge characterization methods, hazard assessment, and spill response and containment; tracing methods; sampling and analysis techniques; termination/removal methods; interface with local agencies; and program evaluation methods.	Assume that once appropriate policies prohibiting illicit discharges and illegal dumping are approved, enforcement and other related activities are phased-in starting in Year 2. Assume that written guidance is needed for orderly implementation. Assume training course for staff involved in IDDE Program is continued from Year 2 with costs covered under staff education (D4).	Complete IDDE Program Plan using guidance documents. Enforcement Plan and existing Spill Response Plan to be included with IDDE Plan. Provide continued training for relevant staff.	
D3. Continue implementation of IDDE Program and enforcement mechanism. CWU staff to conduct field inspections and visually inspect for illicit discharges at 1/3 of all known outfalls that discharge to surface waters.	Field assessments include visual inspection of outfalls during dry weather and documentation of observations and findings consistent with IDDE Program Plan. Assume that some screened outfalls appear suspicious and require follow-up work including the collection of samples, source tracing and removal activities, and possibly enforcement actions consistent with enforcement plan.	Conduct field assessments at 1/3 of all known outfalls and conduct necessary follow-up activities to ensure termination of illicit discharges identified. Keep records of inspections and follow-up activities.	
D4. Provide continued staff training or coordinate with existing training efforts to educate relevant staff on proper BMPs for preventing spills and illicit discharges.	Assume that existing trained staff continue to receive annual refresher courses. Training of additional staff must be conducted no later than 180 days prior to expiration date of Permit (by Aug 2011). However, assume that some training of additional staff begins in Year 2 in order to conduct activities related to IDDE Program, including illicit discharge detection, field assessments, tracing methods, spill response, enforcement activities, etc.	Continue to provide staff training through annual refresher courses for those currently trained. Provide annual refresher for additional staff trained.	
D5. Update completed map of CWU MS4, including new and removed connections, updates to system characteristic data and information, location of previously unknown outfalls and connections, etc.	Assume that CWU has completed MS4 mapping and field survey work by end of Year 2. Assume minimal work needed for annual updates to map by permit compliance staff.	Annually update MS4 mapping.	
<b>YEAR 4</b>			
D2. Review and update written IDDE Program Plan as needed.	Assume limited staff time to review, evaluate, and update written IDDE Program Plan. Assume training course for staff involved in IDDE Program is continued from Year 3 with costs covered under staff education (D4).	Review, evaluate, and update written IDDE Program Plan as needed. Includes review and update of Enforcement Plan and existing Spill Response Plan. Provide continued training for relevant staff.	
D3. Continue implementation of IDDE Program and enforcement mechanism. CWU staff to conduct field inspections and visually inspect for illicit discharges at 1/3 of all known outfalls that discharge to surface waters.	Field assessments include visual inspection of outfalls during dry weather and documentation of observations and findings consistent with IDDE Program Plan. Assume that some screened outfalls appear suspicious and require follow-up work including the collection of samples, source tracing and removal activities, and possibly enforcement actions consistent with enforcement plan.	Conduct field assessments at 1/3 of all known outfalls and conduct necessary follow-up activities to ensure termination of illicit discharges identified. Keep records of inspections and follow-up activities.	
D4. Provide continued staff training or coordinate with existing training efforts to educate relevant staff on proper BMPs for preventing spills and illicit discharges.	Assume that existing trained staff continue to receive annual refresher courses. Training of additional staff must be conducted no later than 180 days prior to expiration date of Permit (by Aug 2011). However, assume that some training of additional staff begins in Year 2 in order to conduct activities related to IDDE Program, including illicit discharge detection, field assessments, tracing methods, spill response, enforcement activities, etc.	Continue to provide staff training through annual refresher courses for those currently trained. Provide annual refresher for additional staff trained.	

D6. Develop and implement a Spill Response Plan that includes coordination with a qualified spill responder.	Note that minimum requirements do not require that Spill Response Plan be completed until Year 5 (by Aug 2011). However, response plan necessary for staff to address spill response and containment, hazard assessment, coordination with qualified local spill responder, etc. Assume costs for incident response and related activities covered under implementation of IDDE Program (D3). Assume that existing Spill Prevention Control and Countermeasure (SPCC) Plan developed for CWU Main Campus addresses spill response and is included in IDDE Program Plan. However, existing plan likely need to be reviewed by permit compliance staff and updated in Year 4.	Review and update existing plan, including the collection of necessary information and coordination with qualified spill responder. Update IDDE Program Plan when completed. Incorporate into future staff training as appropriate. Distribute updated spill response plan with various CWU Depts., City, emergency response, fire department, and other involved parties.	
<b>YEAR 5</b>			
D2. Review and update written IDDE Program Plan as needed.	Assume limited staff time to review, evaluate, and update written IDDE Program Plan. Assume training course for staff involved in IDDE Program is continued from Year 4 with costs covered under staff education (D4).	Review, evaluate, and update written IDDE Program Plan as needed. Includes review and update of Enforcement Plan and current Spill Response Plan. Provide continued training for relevant staff.	
D3. Continue implementation of IDDE Program and enforcement mechanism. CWU staff to conduct field inspections and visually inspect for illicit discharges at 1/3 of all known outfalls that discharge to surface waters.	Field assessments include visual inspection of outfalls during dry weather and documentation of observations and findings consistent with IDDE Program Plan. Assume that some screened outfalls appear suspicious and require follow-up work including the collection of samples, source tracing and removal activities, and possibly enforcement actions consistent with enforcement plan.	Conduct field assessments at 1/3 of all known outfalls and conduct necessary follow-up activities to ensure termination of illicit discharges identified. Keep records of inspections and follow-up activities.	
D4. Provide continued staff training or coordinate with existing training efforts to educate relevant staff on proper BMPs for preventing spills and illicit discharges.	Assume that existing trained staff continue to receive annual refresher courses. Training of additional staff must be conducted no later than 180 days prior to expiration date of Permit (by Aug 2011). However, assume that some training of additional staff begins in Year 2 in order to conduct activities related to IDDE Program, including illicit discharge detection, field assessments, tracing methods, spill response, enforcement activities, etc.	Continue to provide staff training through annual refresher courses for those currently trained. Provide annual refresher for additional staff trained. Evaluate need for training update.	
D5. Update completed map of CWU MS4, including new and removed connections, updates to system characteristic data and information, location of previously unknown outfalls and connections, etc.	Assume that CWU has completed MS4 mapping and field survey work by end of Year 2. Assume minimal work needed for annual updates to map by permit compliance staff.	Annually update MS4 mapping.	
D6. Review and update Spill Response Plan as needed. Continue to implement plan.	Note that minimum requirements do not require that Spill Response Plan be completed until Year 5 (by Aug 2011). However, response plan necessary for staff to address spill response and containment, hazard assessment, coordination with qualified local spill responder, etc. Assume costs for incident response and related activities covered under implementation of IDDE Program (D3). Assume some time for plan to be reviewed by permit compliance staff and updated as needed (e.g., updates of contact personnel information and phone numbers, etc.).	Review revised plan and update as necessary. Include updated version in IDDE Program Plan and redistribute current version to various CWU Depts., City, emergency response, fire department, and other involved parties.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
<b>NPDES</b>			
<b>E. Construction Site Stormwater Runoff Control: Conduct activities and coordinate with local jurisdiction to reduce pollutants in runoff to the MS4 from construction sites one or more acres in size.</b>			
<b>YEAR 1</b>			
E1. For all construction projects under the control of CWU which require a construction stormwater permit, CWU shall obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with <i>Construction Activities</i> , or an alternative NPDES permit prior to discharging construction related stormwater.		Write up internal procedures for FMD level NPDES application. (Contractor must apply for construction general permit for any land disturbing project over 1 acre.	
E2. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		Write up a M.O.U with the EWC, City, and State DOT for formalized documentation and notification of activities.	
E3. Provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control BMPs and requirements, or hire trained contractors to perform the work.		Provide training.	
E4. Coordinate as requested with Ecology or the City of Ellensburg to provide access for inspection of construction sites or other land disturbances, which are under the control of CWU during the active grading and/or construction period.		None	
E5. Use the Minimum Technical Requirements in Appendix 1 of the Eastern Washington Phase II Stormwater Permit as a reference for all new projects owned or operated by CWU.	Not necessary until Year 3, but good to incorporate into existing policy to be prepared. CWU will be required to follow Appendix 1 when the City of Ellensburg adopts the Construction and Post Construction ordinances in Year 3.	Incorporate this with E1 policy.	
<b>YEAR 2</b>			
E1. For all construction projects under the control of CWU which require a construction stormwater permit, CWU shall obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with <i>Construction Activities</i> , or an alternative NPDES permit prior to discharging construction related stormwater.		Update language determined in Year 1 if needed.	
E2. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		Update language determined in Year 1 if needed.	
E3. Provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control BMPs and requirements, or hire trained contractors to perform the work.		Provide training.	
E4. Coordinate as requested with Ecology or the City of Ellensburg to provide access for inspection of construction sites or other land disturbances, which are under the control of CWU during the active grading and/or construction period.		None	
E5. Use the Minimum Technical Requirements in Appendix 1 of the Eastern Washington Phase II Stormwater Permit as a reference for all new projects owned or operated by CWU.	CWU will be required to follow Appendix 1 when the City of Ellensburg adopts the Construction and Post Construction ordinances in Year 3.	Follow requirements in Appendix 1 for new projects.	
<b>YEAR 3</b>			
E1. For all construction projects under the control of CWU which require a construction stormwater permit, CWU shall obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with <i>Construction Activities</i> , or an alternative NPDES permit prior to discharging construction related stormwater.		Update language determined in Year 1 if needed.	
E2. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		Update language determined in Year 1 if needed.	
E3. Provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control BMPs and requirements, or hire trained contractors to perform the work.		Provide training.	
E4. Coordinate as requested with Ecology or the City of Ellensburg to provide access for inspection of construction sites or other land disturbances, which are under the control of CWU during the active grading and/or construction period.		None	
E5. Comply with the Minimum Technical Requirements in Appendix 1 of the Eastern Washington Phase II Stormwater Permit to be included on all new projects owned or operated by CWU.		Follow requirements in Appendix 1 for new projects.	
<b>YEAR 4</b>			
E1. For all construction projects under the control of CWU which require a construction stormwater permit, CWU shall obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with <i>Construction Activities</i> , or an alternative NPDES permit prior to discharging construction related stormwater.		Update language determined in Year 1 if needed.	
E2. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		Update language determined in Year 1 if needed.	
E3. Provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control BMPs and requirements, or hire trained contractors to perform the work.		Provide training.	
E4. Coordinate as requested with Ecology or the City of Ellensburg to provide access for inspection of construction sites or other land disturbances, which are under the control of CWU during the active grading and/or construction period.		None	
E5. Comply with the Minimum Technical Requirements in Appendix 1 of the Eastern Washington Phase II Stormwater Permit to be included on all new projects owned or operated by CWU.		Follow requirements in Appendix 1 for new projects.	
<b>YEAR 5</b>			
E1. For all construction projects under the control of CWU which require a construction stormwater permit, CWU shall obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with <i>Construction Activities</i> , or an alternative NPDES permit prior to discharging construction related stormwater.		Update language determined in Year 1 if needed.	
E2. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		Update language determined in Year 1 if needed.	
E3. Provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control BMPs and requirements, or hire trained contractors to perform the work.		Provide training.	
E4. Coordinate as requested with Ecology or the City of Ellensburg to provide access for inspection of construction sites or other land disturbances, which are under the control of CWU during the active grading and/or construction period.		None	
E5. Comply with the Minimum Technical Requirements in Appendix 1 of the Eastern Washington Phase II Stormwater Permit to be included on all new projects owned or operated by CWU.		Follow requirements in Appendix 1 for new projects.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
<b>NPDES</b>			
<b>F. Post Construction Stormwater Management: Coordinate with local jurisdiction to address post construction stormwater runoff to the MS4 from sites one or more acres in size.</b>			
<b>YEAR 1</b>			
F1. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		May need to enhance standard language that is written into specifications for projects, and incorporate into A3 policy.	
<b>YEAR 2</b>			
F1. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		Coordinate with the City of Ellensburg.	
<b>YEAR 3</b>			
F1. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		Coordinate with the City of Ellensburg.	
<b>YEAR 4</b>			
F1. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		Coordinate with the City of Ellensburg.	
<b>YEAR 5</b>			
F1. Coordinate with the City of Ellensburg regarding projects owned and operated by other entities which discharge into CWU's MS4, to assist the City of Ellensburg with achieving compliance with all relevant ordinances, rules, and regulations.		Coordinate with the City of Ellensburg.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
<b>NPDES</b>			
<b>G. Pollution Prevention and Good Housekeeping for Municipal Operations: Develop and implement an on-going O&amp;M program, including a staff training program, aimed at preventing or reducing pollutant runoff from municipal operations.</b>			
<b>YEAR 1</b>			
G1. As of the effective date of the permit, have reviewed all university "industrial" facilities/sites and sought coverage under statewide NPDES Industrial Stormwater General Permit for sites meeting criteria for coverage.		Not applicable at this time.	
G2. CWU to continue performing existing storm system maintenance activities. Includes on-going inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facility (BMP) maintenance, and proper waste disposal.		City to continue existing storm system inspection and maintenance activities.	
<b>YEAR 2</b>			
G2. CWU to continue performing existing storm system maintenance activities. Includes on-going inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facility (BMP) maintenance, and proper waste disposal.		CWU to continue existing storm system inspection and maintenance activities.	
G3. Begin developing a good housekeeping plan and schedule (O&M Plan) for university operation and maintenance activities aimed at preventing and reducing water quality impacts. Must be at least as protective as relevant chapters of the E. WA Stormwater Manual and must include provisions for record keeping. The O&M Plan must address the following types of facilities or activities that are present within the permittee's boundaries: stormwater collection and conveyance system O&M; road, highway, and parking lot O&M; vehicle fleet storage, washing, and maintenance; building cleaning, washing, painting and other O&M activities; park and open space O&M activities; material and equipment storage areas and maintenance areas; and all other facilities that can reasonably be expected to discharge contaminated runoff. The O&M Plan must include a schedule of inspections and requirements for record keeping, and identify the department (and as appropriate, specific staff) responsible for performing each activity.	O&M Plan is due by the end of Year 3. Assume that it takes two years to fully develop the O&M Plan and that appropriate staff from the various Departments/Divisions are involved (this is a large effort and could easily take longer).	Begin developing a good housekeeping plan and schedule (O&M Plan) for municipal operation and maintenance activities aimed at preventing and reducing water quality impacts. Must be at least as protective as relevant chapters of the E. WA Stormwater Manual. Must include schedule for inspections and address methods of record keeping.	
G4. Seek coverage under statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. Use applicable source control and good housekeeping BMPs during all university construction projects.	Assume that NPDES Construction Stormwater permits are being sought for projects, as needed, and that appropriate construction and post construction controls are employed. Assume that projects not subject to NPDES permitting still include source control and good housekeeping BMPs as applicable. However, need to create and maintain records of such.	Need money and staff to create and maintain records of seeking and complying with construction permits for municipal projects.	
<b>YEAR 3</b>			
G3. Complete development and begin implementation of the good housekeeping plan and schedule (O&M Plan) started in year 2.	Cost presented here assume that leadership, technical support, advice, and record keeping is provided by stormwater compliance staff who work to complete the plan.	Complete development of good housekeeping plan and schedule (O&M Plan) for university operation and maintenance activities. Begin implementation of the plan working with affected departments and divisions. Maintain records.	
G4. Seek coverage under statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. Use applicable source control and good housekeeping BMPs during all construction projects.	Assume that NPDES Construction Stormwater permits are being sought for projects, as needed, and that appropriate construction and post construction controls are employed. Assume that projects not subject to NPDES permitting still include source control and good housekeeping BMPs as applicable. However, need to create and maintain records of such. Cost of seeking and compliance with construction permit will be borne by Department/Division executing project.	Need money and staff to create and maintain records of seeking and complying with construction permits for university projects. Technical assistance to project proponent would cost more.	
G5. Begin developing a good housekeeping staff training program (materials, schedules, who gets what training, etc. ) to meet the needs of the O&M Plan completed in G1. Training must include all employees whose construction, operations, and maintenance job functions may impact stormwater quality. Training shall address the importance of protecting water quality, the requirements of the NPDES permit, proper O&M requirements, inspection procedures, ways to perform their job while protecting water quality, procedures for reporting water quality concerns and suspected illicit discharges.	Assume that it takes at least one year to develop the good housekeeping training program and that appropriate staff from the various departments/divisions are involved (this is a large effort and could easily take longer). Assume program development is lead by stormwater compliance staff and is a direct stormwater program cost.	Develop good housekeeping training materials and program, involve various affected departments/divisions and associated staff.	
G6. Begin implementing storm system maintenance activities in accordance with appropriate schedules. Includes inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facilities (BMP) maintenance, and proper waste disposal.	Assume that it takes 2 years to fully phase-in enhanced activities. Assume that facilities do not exist for proper waste disposal (construction of a "vector" waste dewatering/decant facility may be required). Assume that most necessary heavy equipment is available, however some specialized equipment may need to be rented. Costs here are for phasing-in full stormwater system maintenance and oversight by compliance staff who review and record practices and provide technical assistance.	Estimated costs for enhanced maintenance program with stormwater compliance staff to provide oversight and technical assistance during implementation of new/changed practices, assure record as kept. Work closely with responsible departments/divisions. Additional cost for coordinating with the City of Ellensburg to construct a new decant facility (total \$100,000) at 20% this year for engineering.	
G7. Begin implementing enhanced pollution prevention and good housekeeping practices established in the O&M plan for roads and parking lots. Need to address deicing, anti-icing, and snow removal practices; snow disposal areas; material (e.g. salt, sand, or other chemical) storage areas; all-season BMPs to reduce road and parking lot debris and other pollutants from entering the MS4.	Assume that it takes 2 years to fully phase-in activities. Assume that street sweeping continues to be one of the preferred all season BMPs employed by CWU with additional water quality-oriented weather report-based sweeping in some areas on a seasonal basis. Assume that snow removal and ice control activities continue at current level of effort and that waste and snow disposal areas are available. Costs here are for improved materials and for stormwater compliance staff to review and record practices and provide technical assistance.	Estimated costs for enhanced practices with stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible departments/divisions.	
G8. Begin conducting all vehicle and equipment washing and maintenance in a self-contained building or wash area and/or maintenance area where all wash water is kept out of the MS4.	Assume that physical facilities are readily available for washing and maintenance work. Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Some costs for changed practices may have to be borne by the department/division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G9. Begin implementing pollution prevention and good housekeeping practices established in the O&M Plan for external building maintenance activities at all university-owned buildings. The O&M Plan shall address exterior cleaning and maintenance of buildings, including cleaning, washing, painting and other maintenance activities.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G10. Begin implementing pollution prevention and good housekeeping practices established in the O&M Plan at all university-owned parks and open spaces. The Plan shall address proper application of fertilizer, pesticides, and herbicides; sediment and erosion control; BMPs for landscape maintenance and vegetation disposal; and trash management.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Park storm system, park/open space O&M activities, and changed practices. Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G11. Begin developing Stormwater Pollution Prevention Plans to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas not covered by a statewide NPDES Industrial Stormwater General Permit.	Assume that it takes at least one year to identify/screen all known facilities, evaluate practices, develop SWPPPs, and identify training needs. Assume cost estimate only involves NPDES permit compliance official leading development of the SWPPP and training materials, and conducting training, not the cost of implementing the SWPPP on site, which will be borne by the department/division operating the site.	Develop Stormwater Pollution Prevention Plans to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas not covered by a statewide NPDES Industrial SW General Permit.	

G12. Begin conducting spot checks of stormwater treatment and flow control facilities after major rainfall events (greater than 10 year, 24-hour recurrence interval).	Assume that inspection is performed by properly trained maintenance staff using standardized field data collection forms. Stormwater compliance staff will oversee work, provide technical assistance, and ensure that records are kept.	Conduct spot checks of stormwater treatment and flow control facilities after major rainfall events. Identify repair or maintenance needs, resolve concerns, and maintain records.	
<b>YEAR 4</b>			
G4. Seek coverage under statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. Use applicable source control and good housekeeping BMPs during all construction projects.	Assume that NPDES Construction Stormwater permits are being sought for projects, as needed, and that appropriate construction and post construction controls are employed. Assume that projects not subject to NPDES permitting still include source control and good housekeeping BMPs as applicable. However, need to create and maintain records of such. Cost of seeking and compliance with construction permit will be borne by Department/Division executing project.	Need money and staff to create and maintain records of seeking and complying with construction permits for projects. Technical assistance to project proponent would cost more.	
G5. Finish developing and execute a good housekeeping training program for the various staff groups.	Assume formal day of training in-house and time in the field. Assume training is lead by stormwater compliance staff and is a direct stormwater program cost.	Conduct good housekeeping training program for various affected Departments/Divisions and associated staff.	
G6. Continue phasing-in and implementing enhanced storm system maintenance activities in accordance with appropriate schedules. Includes inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facilities (BMP) maintenance, and proper waste disposal.	Assume that it takes 2 years to fully phase-in enhanced activities. Assume that facilities exist for proper waste disposal (construction of a "vactor" waste dewatering/decant facility may be required). Assume that most necessary heavy equipment is available, however some specialized equipment may need to be rented. Costs here are for phasing-in full stormwater system maintenance and oversight by compliance staff who review and record practices and provide technical assistance.	Estimated costs for enhanced maintenance program with stormwater compliance staff to provide oversight and technical assistance during implementation of new/changed practices, assure record as kept. Work closely with responsible Departments/Divisions. Additional cost for coordinating with the City of Ellensburg to construct a new decant facility (total \$100,000) at 80% this year for construction.	
G7. Continue phasing-in and implementing enhanced pollution prevention and good housekeeping practices established in the O&M plan for roads, highways, parking lots. Need to address snow removal, de-icing, snow disposal, material storage & application, and all season BMPs to reduce pollution into the MS4.	Assume that it takes 2 years to fully phase-in activities. Assume that street sweeping continues to be one of the preferred all season BMPs employed by CWU with additional water quality oriented weather report based sweeping in some areas on a seasonal basis. Assume that snow removal and ice control activities continue at current level of effort and that waste and snow disposal areas are available. Costs here are for improved materials and for stormwater compliance staff to review and record practices and provide technical assistance.	Estimated costs for enhanced practices with stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible Departments/Divisions.	
G8. Continue conducting all vehicle and equipment washing and maintenance in self-contained building or wash area and/or maintenance areas where all wash water is kept out of the MS4.	Assume that physical facilities are readily available for washing and maintenance work. Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Some costs for changed practices may have to be borne by the Department/Division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible Department/Division.	
G9. Continue phasing-in and implementing pollution prevention and good housekeeping practices established in the O&M Plan for building maintenance activities at all university-owned buildings.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G10. Continue phasing-in and implementing pollution prevention and good housekeeping practices established in the O&M Plan at all university-owned parks and open spaces.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Park storm system, park/open space O&M activities, and changed practices. Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G11. Finish developing and begin implementing Stormwater Pollution Prevention Plans to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas not covered by a statewide NPDES Industrial Stormwater General Permit. Develop training materials and execute training as needed.	Assume cost estimate only involves NPDES permit compliance official leading development of the SWPPP and training materials, and conducting training, not the cost of implementing the SWPPP on site, which will be borne by the department/division operating the site. Assume that level of effort drops in years 4-5 because training materials, training program, and procedures have already been established.	Complete Stormwater Pollution Prevention Plans to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas, conduct training, implement SWPPPs.	
G12. Conduct spot checks at stormwater treatment and flow control facilities after major rainfall events (greater than 24-hour, 10 year recurrence interval).	Assume that inspection is performed by properly trained maintenance staff using standardized field data collection forms. Stormwater compliance staff will oversee work, provide technical assistance, and ensure that records are kept.	Conduct spot checks of stormwater treatment and flow control facilities after major rainfall events. Identify repair or maintenance needs, resolve concerns, and maintain records.	
G13. As soon as practicable, execute any repair and maintenance projects needed based on observations made during regular inspections or spot checks of stormwater treatment and flow control facilities.	Could involve anything from light maintenance to major reconstruction. Cost estimate here will generally assume that few major construction or reconstruction projects are needed (or will help be paid for by multiple departments/divisions). Cost here is for stormwater compliance staff to provide technical support and approval of needed repairs, ensure that records are kept, and provide some funding for the project.	Fix or repair observed problems at stormwater treatment and flow control facilities after major storm events. Keep records of repairs and costs.	
G14. Begin using source control and good housekeeping BMPs during other university activities and at other university sites that would reasonably be expected to discharge contaminated runoff.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
<b>YEAR 5</b>			
G4. Seek coverage under statewide NPDES Construction Stormwater General Permit for projects meeting criteria for coverage. Use applicable source control and good housekeeping BMPs during all construction projects.	Assume that NPDES Construction Stormwater permits are being sought for projects, as needed, and that appropriate construction and post construction controls are employed. Assume that projects not subject to NPDES permitting still include source control and good housekeeping BMPs as applicable. However, need to create and maintain records of such. Cost of seeking and compliance with construction permit will be borne by Department/Division executing project.	Need money and staff to create and maintain records of seeking and complying with construction permits for projects. Technical assistance to project proponent would cost more.	
G5. Update good housekeeping training of staff groups as needed.	Assume formal day of training in-house and time in the field. Assume training is lead by stormwater compliance staff and is a direct stormwater program cost.	Evaluate need for training update. Update and repeat good housekeeping training program for various affected departments/divisions and associated staff.	
G6. Fully implement enhanced storm system maintenance activities in accordance with appropriate schedules. Includes inspection of system components, catch basin and culvert cleaning, open channel cleaning and trash removal, structural BMP inspection, runoff treatment and flow control facility (BMP) maintenance, and proper waste disposal.	Assume that facilities exist for proper waste disposal (modification of existing "vactor" waste dewatering/decant facility may be required). Assume that most necessary heavy equipment is available, however some specialized equipment may need to be rented. Costs here are for phasing-in full stormwater system maintenance and oversight by compliance staff who review and record practices and provide technical assistance.	Estimated costs for enhanced maintenance program with stormwater compliance staff to provide oversight and technical assistance during implementation of new/changed practices, assure record as kept. Work closely with responsible Departments/Divisions.	

G7. Fully implement enhanced pollution prevention and good housekeeping practices established in the O&M plan for roads, highways, parking lots. Need to address snow removal de-icing, snow disposal, material storage & application, and all season BMPs to reduce pollution into the MS4.	Assume that street sweeping continues to be one of the preferred all season BMPs employed by CWU with additional water quality oriented weather report based sweeping in some areas on a seasonal basis. Assume that snow removal and ice control activities continue at current level of effort and that waste and snow disposal areas are available. Costs here are for improved materials and for stormwater compliance staff to review and record practices and provide technical assistance.	Estimated costs for enhanced practices with stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible Department/Divisions.	
G8. Fully implement all vehicle and equipment washing and maintenance in self-contained building or wash area and/or maintenance areas where all wash water is kept out of the MS4.	Assume that physical facilities are readily available for washing and maintenance work. Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Some costs for changed practices may have to be borne by the Department/Division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible Department/Division.	
G9. Fully implement pollution prevention and good housekeeping practices established in the O&M Plan for maintenance activities at all university-owned buildings.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Stormwater compliance staff to provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G10. Fully implement pollution prevention and good housekeeping practices established in the O&M Plan at all university-owned parks and open spaces.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work.	Park storm system, park/open space O&M activities, and changed practices. Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	
G11. Fully implement Stormwater Pollution Prevention Plans to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas not covered by a statewide NPDES Industrial Stormwater General Permit. Update training materials and execute training as needed.	Assume cost estimate only involves NPDES permit compliance official leading development of the SWPPP and training materials, and conducting training, not the cost of implementing the SWPPP on site, which will be borne by the department/division operating the site. Assume that level of effort drops in years 4-5 because training materials, training program, and procedures have already been established.	Implement Stormwater Pollution Prevention Plans to protect water quality at material storage areas, heavy equipment storage areas, and maintenance areas, conduct training, implement SWPPPs.	
G12. Conduct spot checks at stormwater treatment and flow control facilities after major rainfall events (greater than 24-hour, 10 year recurrence interval).	Assume that inspection is performed by properly trained maintenance staff using standardized field data collection forms. Stormwater compliance staff will oversee work, provide technical assistance, and ensure that records are kept.	Conduct spot checks of stormwater treatment and flow control facilities after major rainfall events. Identify repair or maintenance needs, resolve concerns, and maintain records.	
G13. As soon as practicable, execute any repair and maintenance projects needed based on observations made during regular inspections or spot checks of stormwater treatment and flow control facilities.	Could involve anything from light maintenance to major reconstruction. Cost estimate here will generally assume that few major construction or reconstruction projects are needed (or will help be paid for by multiple departments/divisions). Cost here is for stormwater compliance staff to provide technical support and approval of needed repairs, ensure that records are kept, and provide some funding for the project.	Fix or repair observed problems at stormwater treatment and flow control facilities after major storm events. Keep records of repairs and costs.	
G14. Fully implement source control and good housekeeping BMPs during other university activities and at other university sites that would reasonably be expected to discharge contaminated runoff.	Costs here are for stormwater compliance staff to review and record practices and provide technical assistance. Cost of changed practices is borne by the department/division conducting the work. Assume that there are several facilities meeting criteria.	Stormwater compliance staff provide oversight and technical assistance during implementation of changed practices, assure records are kept. Work closely with responsible department/division.	

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
<b>NPDES</b>			
<b>H. Compliance with Total Maximum Daily Load Allocations</b>			
<b>YEAR 1</b>			
H1. If applicable, CWU shall comply with the specific requirements identified in Appendix 2 of the Eastern Washington Phase II NPDES Permit. CWU shall keep records of all actions required by this permit that are relevant to applicable TMDLs within their jurisdiction.	Not applicable at this time.	Participation in TMDL development may be desirable.	
H2. For applicable TMDLs not listed in Appendix 2, compliance with this permit shall constitute compliance with those TMDLs.	Not applicable at this time.	None	
<b>YEAR 2</b>			
H1. Participate in the development of TMDLs.			
H2. Comply with applicable TMDL provisions (could involve outfall monitoring, retrofitting treatment into existing storm drains, enhanced source control efforts, etc.).			
H3. Track status of TMDL implementation progress. Track and record stormwater efforts aimed at addressing TMDLs on receiving waters.			
<b>YEAR 3</b>			
H1. Participate in the development of TMDLs.			
H2. Comply with applicable TMDL provisions (could involve outfall monitoring, retrofitting treatment into existing storm drains, enhanced source control efforts, etc.).			
H3. Track status of TMDL implementation progress. Track and record stormwater efforts aimed at addressing TMDLs on receiving waters.			
<b>YEAR 4</b>			
H1. Participate in the development of TMDLs.			
H2. Comply with applicable TMDL provisions (could involve outfall monitoring, retrofitting treatment into existing storm drains, enhanced source control efforts, etc.).			
H3. Track status of TMDL implementation progress. Track and record stormwater efforts aimed at addressing TMDLs on receiving waters.			
<b>YEAR 5</b>			
H1. Participate in the development of TMDLs.			
H2. Comply with applicable TMDL provisions (could involve outfall monitoring, retrofitting treatment into existing storm drains, enhanced source control efforts, etc.).			

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
<b>NPDES</b>			
<b>I. Monitoring and Program Evaluation Requirements</b>			
<b>YEAR 1</b>			
I1. Describe any stormwater monitoring or studies conducted during the reporting period, to be submitted with the annual report.	If stormwater monitoring was conducted on behalf of CWU, or if studies or investigations conducted by other entities were reported to CWU, a brief description of the type of information gathered or received shall be included in the annual report(s) covering the time period(s) during which the information was received.		
I2. Assess the appropriateness of the BMPs identified by CWU for each component of the SWMP and any changes made, or anticipated to be made, to the BMPs that were previously selected to implement the SWMP, and why. To be submitted in each annual report.			
<b>YEAR 2</b>			
I1. Describe any stormwater monitoring or studies conducted during the reporting period, to be submitted with the annual report.	If stormwater monitoring was conducted on behalf of CWU, or if studies or investigations conducted by other entities were reported to CWU, a brief description of the type of information gathered or received shall be included in the annual report(s) covering the time period(s) during which the information was received.	Provide a brief description of the type of information gathered or received if any.	
I2. Assess the appropriateness of the BMPs identified by CWU for each component of the SWMP and discuss any changes made, or anticipated to be made, to the BMPs that were previously selected to implement the SWMP, and why. To be submitted in each annual report.			
I3. Recommend that CWU participate in or establish a local water-quality monitoring program to assess baseline conditions and to evaluate effectiveness of SWM Program or TMDL implementation activities. Includes monitoring outfall quality to receiving waters. Provide a description of any stormwater monitoring or studies conducted by or on behalf of the CWU and include in annual report.	Recommended activity for CWU to consider. Specific water sampling and testing not required during effective term of permit, unless required as part of applicable TMDL. Assume some participation by City with local agencies conducting routine or special water quality monitoring studies.	Participate in local water quality monitoring studies. Submit description of water quality monitoring studies with annual report to Ecology.	
<b>YEAR 3</b>			
I1. Describe any stormwater monitoring or studies conducted during the reporting period, to be submitted with the annual report.	If stormwater monitoring was conducted on behalf of CWU, or if studies or investigations conducted by other entities were reported to CWU, a brief description of the type of information gathered or received shall be included in the annual report(s) covering the time period(s) during which the information was received.	Provide a brief description of the type of information gathered or received if any.	
I2. Assess the appropriateness of the BMPs identified by CWU for each component of the SWMP and discuss any changes made, or anticipated to be made, to the BMPs that were previously selected to implement the SWMP, and why. To be submitted in each annual report.			
I3. Recommend that CWU participate in or establish a local water-quality monitoring program to assess baseline conditions and to evaluate effectiveness of SWM Program or TMDL implementation activities. Includes monitoring outfall quality to receiving waters. Provide a description of any stormwater monitoring or studies conducted by or on behalf of the City and include in annual report.	Recommended activity for CWU to consider. Specific water sampling and testing not required during effective term of permit, unless required as part of applicable TMDL. Assume some participation by City with local agencies conducting routine or special water quality monitoring studies.	Participate in local water quality monitoring studies. Submit description of water quality monitoring studies with annual report to Ecology.	
<b>YEAR 4</b>			
I1. Describe any stormwater monitoring or studies conducted during the reporting period, to be submitted with the annual report.	If stormwater monitoring was conducted on behalf of CWU, or if studies or investigations conducted by other entities were reported to CWU, a brief description of the type of information gathered or received shall be included in the annual report(s) covering the time period(s) during which the information was received.	Provide a brief description of the type of information gathered or received if any.	
I2. Assess the appropriateness of the BMPs identified by CWU for each component of the SWMP and discuss any changes made, or anticipated to be made, to the BMPs that were previously selected to implement the SWMP, and why. To be submitted in each annual report.			
I3. Recommend that CWU participate in or establish a local water-quality monitoring program to assess baseline conditions and to evaluate effectiveness of SWM Program or TMDL implementation activities. Includes monitoring outfall quality to receiving waters. Provide a description of any stormwater monitoring or studies conducted by or on behalf of the City and include in annual report.	Recommended activity for CWU to consider. Specific water sampling and testing not required during effective term of permit, unless required as part of applicable TMDL. Assume some participation by City with local agencies conducting routine or special water quality monitoring studies.	Participate in local water quality monitoring studies. Submit description of water quality monitoring studies with annual report to Ecology.	
<b>YEAR 5</b>			
I1. Describe any stormwater monitoring or studies conducted during the reporting period, to be submitted with the annual report.	If stormwater monitoring was conducted on behalf of CWU, or if studies or investigations conducted by other entities were reported to CWU, a brief description of the type of information gathered or received shall be included in the annual report(s) covering the time period(s) during which the information was received.	Provide a brief description of the type of information gathered or received if any.	
I2. Assess the appropriateness of the BMPs identified by CWU for each component of the SWMP and discuss any changes made, or anticipated to be made, to the BMPs that were previously selected to implement the SWMP, and why. To be submitted in each annual report.			

Summary of Regulatory Requirements	Notes & Assumptions	Assessment of New Activities Needed for Compliance	Status Check List √
<b>NPDES</b>			
<b>J. Reporting and Record Keeping Requirements</b>			
<b>YEAR 1</b>			
J1. Develop written Stormwater Management Program (SWMP) for submittal in permit year 2 with annual report, follow program component format established by Ecology.	Must submit a copy of SWMP to Ecology with the annual report beginning no later than March 31, 2008. Assume that development of the SWMP begins during permit year 1.	Prepare SWMP according to Ecology format. Assume a significant effort by multiple staff.	
J2. Develop and implement an ongoing process for gathering, recording, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals). Information to be provided in annual report includes the status of implementation of each component in the SWMP; an assessment of CWU's progress towards meeting the minimum performance standards established for each of the minimum control measures of the SWMP; a summary of CWU's evaluation of their SWMP; and notice that CWU is relying on the City of Ellensburg to satisfy obligations under this permit.	Assume that this involves lead permit compliance staff: (1) itemizing the types of recordkeeping needed for each category of permit requirement; (2) meeting with various department/divisions to learn about current record keeping activities; (3) assessing the need for new processes or changes or enhancements to existing processes; (4) creating or modifying record keeping forms as needed; (5) and working with various directors/managers/staff to ensure implementation of the new processes.	Itemize the types of recordkeeping needed for permit; meet with various department/divisions; assess need for new or changed processes; create record keeping forms/protocols; work with directors/managers/staff to implement. Significant effort by staff at multiple levels.	
<b>YEAR 2</b>			
J1. Update written Stormwater Management Program (SWMP) for submittal in permit year 3 with annual report.	Assume this update occurs in the 4th quarter with the updated plan submitted with annual report in the following permit year.	Update SWMP according to Ecology format. Assume a fair effort by multiple staff.	
J2. Continue ongoing process for gathering, recording, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals).	Assume that this involves reviewing and modifying the process developed as needed.	Complete development of record keeping forms/protocols; work with directors/managers/staff to implement. Fair effort by staff at multiple levels.	
J3. Use information from J2 to evaluate the effectiveness of the SWMP components implemented to date, including whether the SWMP is preventing adverse impacts to water quality.	Assume this is a relatively simple process that considers the activities detailed for each SWMP component and cross-check them against records (e.g., reaching target audiences, site plan review and inspection program goals, storm system maintenance inspection goals, and other measurable goals established). Also cross-check activities against established literature, studies, and accepted BMP manuals to assess impact to water quality. Assume that this analysis is presented/discussed in a narrative portion of the annual report.	Develop evaluation approach, conduct evaluation, prepare narrative of process and results for inclusion in annual report to Ecology.	
J4. Prepare and submit year 1 annual report and SWMP to Ecology. Use annual report form established by Ecology. The annual report must describe the status of compliance with permit conditions, including: (1) the status of implementation of each component of the SWMP; (2) an assessment of progress towards meeting the minimum performance standards (measurable goals) established for each minimum control measure of the SWMP; and (3) summary of SWMP evaluation (including evaluation of effectiveness of SWMP and appropriateness of BMPs selected). Note if relying upon another entity for implementation of any BMPs or other permit obligations.	Reports are due no later than March 31 each year beginning in 2008. Assume that in later years, it takes a fairly senior staff person working half time from January 1 to March 31 to prepare the report - including gathering all of the records, meeting with departments/division/staff responsible for various components, tracking down/reviewing all necessary records, preparing summaries and maps, etc. Effort may be less in first couple years but will grow in later years as required SWMP activities implemented increase.	Prepare and submit annual report.	
J5. Include notification of any jurisdictional boundary changes resulting in an increase or decrease in CWU's geographic area of permit coverage during the reporting period, and implications for the SWMP.		Include notification of any boundary changes and implications for the SWMP.	
<b>YEAR 3</b>			
J1. Update written Stormwater Management Program (SWMP) for submittal in permit year 4 with annual report.	Assume this update occurs in the 4th quarter with the updated plan submitted with annual report in the following permit year.	Update SWMP according to Ecology format. Assume a fair effort by multiple staff.	
J2. Continue ongoing process for gathering, recording, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals).	Assume that this involves reviewing and modifying the process developed as needed.	Complete development of record keeping forms/protocols; work with directors/managers/staff to implement. Fair effort by staff at multiple levels.	
J3. Use information from J2 to evaluate the effectiveness of the SWMP components implemented to date, including whether the SWMP is preventing adverse impacts to water quality.	Assume this is a relatively simple process that considers the activities detailed for each SWMP component and cross-check them against records (e.g., reaching target audiences, site plan review and inspection program goals, storm system maintenance inspection goals, and other measurable goals established). Also cross-check activities against established literature, studies, and accepted BMP manuals to assess impact to water quality. Assume that this analysis is presented/discussed in a narrative portion of the annual report.	Review/update evaluation approach, conduct evaluation, prepare narrative of process and results for inclusion in annual report to Ecology.	
J4. Prepare and submit year 2 annual report and SWMP to Ecology. Use annual report form established by Ecology. The annual report must describe the status of compliance with permit conditions, including: (1) the status of implementation of each component of the SWMP; (2) an assessment of progress towards meeting the minimum performance standards (measurable goals) established for each minimum control measure of the SWMP; and (3) summary of SWMP evaluation (including evaluation of effectiveness of SWMP and appropriateness of BMPs selected). Note if relying upon another entity for implementation of any BMPs or other permit obligations.	Reports are due no later than March 31 each year beginning in 2008. Assume that in later years, it takes a fairly senior staff person working half time from January 1 to March 31 to prepare the report - including gathering all of the records, meeting with departments/division/staff responsible for various components, tracking down/reviewing all necessary records, preparing summaries and maps, etc. Effort may be less in first couple years but will grow in later years as required SWMP activities implemented increase.	Prepare and submit annual report.	
J5. Include notification of any jurisdictional boundary changes resulting in an increase or decrease in CWU's geographic area of permit coverage during the reporting period, and implications for the SWMP.		Include notification of any boundary changes and implications for the SWMP.	
<b>YEAR 4</b>			
J1. Update written Stormwater Management Program (SWMP) for submittal in permit year 4 with annual report.	Assume this update occurs in the 4th quarter with the updated plan submitted with annual report in the following permit year.	Update SWMP according to Ecology format. Assume a fair effort by multiple staff.	
J2. Continue ongoing process for gathering, recording, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals).	Assume that this involves reviewing and modifying the process developed as needed.	Enact record keeping forms/protocols; work with directors/managers/staff to implement. Fair effort by staff at multiple levels.	
J4. Prepare and submit year 3 annual report and SWMP to Ecology. Use annual report form established by Ecology. The annual report must describe the status of compliance with permit conditions, including: (1) the status of implementation of each component of the SWMP; (2) an assessment of progress towards meeting the minimum performance standards (measurable goals) established for each minimum control measure of the SWMP; and (3) summary of SWMP evaluation (including evaluation of effectiveness of SWMP and appropriateness of BMPs selected). Note if relying upon another entity for implementation of any BMPs or other permit obligations.	Reports are due no later than March 31 each year beginning in 2008. Assume that in later years, it takes a fairly senior staff person working half time from January 1 to March 31 to prepare the report - including gathering all of the records, meeting with departments/division/staff responsible for various components, tracking down/reviewing all necessary records, preparing summaries and maps, etc. Effort may be less in first couple years but will grow in later years as required SWMP activities implemented increase.	Prepare and submit annual report.	
J5. Include notification of any jurisdictional boundary changes resulting in an increase or decrease in CWU's geographic area of permit coverage during the reporting period, and implications for the SWMP.		Include notification of any boundary changes and implications for the SWMP.	

YEAR 5			
J1. Update written Stormwater Management Program (SWMP) for submittal in permit year 1 (2nd permit cycle) with annual report.	Assume this update occurs in the 4th quarter with the updated plan submitted with annual report in the following permit year.	Update SWMP according to Ecology format. Assume a fair effort by multiple staff.	
J2. Continue ongoing process for gathering, recording, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate permit compliance/noncompliance, and evaluate the effectiveness of SWMP implementation (develop measurable goals).	Assume that this involves reviewing and modifying the process developed as needed.	Enact record keeping forms/protocols; work with directors/managers/staff to implement. Fair effort by staff at multiple levels.	
J3. Use information from J2 to evaluate the effectiveness of the SWMP components implemented to date, including whether the SWMP is preventing adverse impacts to water quality.	Assume this is a relatively simple process that considers the activities detailed for each SWMP component and cross-check them against records (e.g., reaching target audiences, site plan review and inspection program goals, storm system maintenance inspection goals, and other measurable goals established). Also cross-check activities against established literature, studies, and accepted BMP manuals to assess impact to water quality. Assume that this analysis is presented/discussed in a narrative portion of the annual report.	Review/update evaluation approach, conduct evaluation, prepare narrative of process and results for inclusion in annual report to Ecology.	
J4. Prepare and submit year 4 annual report and SWMP to Ecology. Use annual report form established by Ecology. The annual report must describe the status of compliance with permit conditions, including: (1) the status of implementation of each component of the SWMP; (2) an assessment of progress towards meeting the minimum performance standards (measurable goals) established for each minimum control measure of the SWMP; and (3) summary of SWMP evaluation (including evaluation of effectiveness of SWMP and appropriateness of BMPs selected). Note if relying upon another entity for implementation of any BMPs or other permit obligations.	Reports are due no later than March 31 each year beginning in 2008. Assume that in later years, it takes a fairly senior staff person working half time from January 1 to March 31 to prepare the report - including gathering all of the records, meeting with departments/division/staff responsible for various components, tracking down/reviewing all necessary records, preparing summaries and maps, etc. Effort may be less in first couple years but will grow in later years as required SWMP activities implemented increase.	Prepare and submit annual report.	
J5. Include notification of any jurisdictional boundary changes resulting in an increase or decrease in CWU's geographic area of permit coverage during the reporting period, and implications for the SWMP.		Include notification of any boundary changes and implications for the SWMP.	