



Secondary Permittees

Municipal Stormwater Permit
Mount Vernon, Washington
March 9, 2007



What is a secondary permittee?

- Ecology created the term
- Federal regulation have a broad definition of a municipality
- Ecology provided a path to compliance for “municipalities” with limited land use authority.



Secondary permittees...

- Not cities or counties
- Public body created pursuant to state law
- Own or operate a stormwater conveyance or collection system
- Connected to urban area
- Serve a population > 1000



Out?

- If your district or institution does not meet the definition, do the following...

Continue to manage
stormwater responsibly

No action for permit is required



What is a secondary permittee supposed to do?

- Apply
 - › Consider applying as a co-permittee
 - › Submit a Notice of Intent (Appendix 5)
- Comply with applicable permit
 - › Develop a Stormwater Management Program
 - › Report
 - › Coordinate



Stormwater Management Program

Six minimum measures to control pollution to the maximum extent practicable



Stormwater Management Program

- S6.D.1. Public Education and Outreach
- S6.D.2. Public Participation and Involvement
- S6.D.3. Illicit Discharge Detection & Elimination
- S6.D.4. Construction Site Runoff Control
- S6.D.5. Post Construction Stormwater Management for New Development and Redevelopment
- S6.D.6. Pollution Prevention and Good Housekeeping



Stormwater Management Program

That's pretty clear isn't it

- Do the minimum
- Achieve maximum

And

The world will be a beautiful
place



Stormwater Management Program

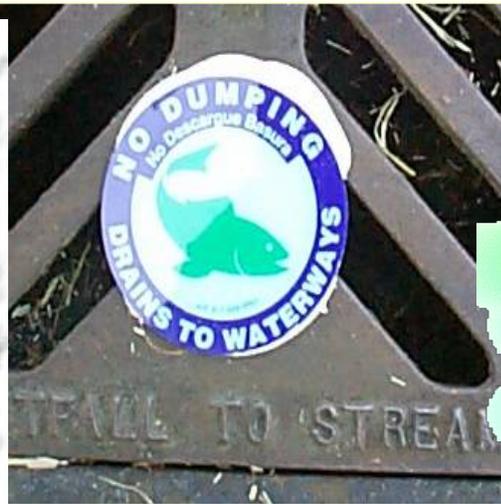
How much is enough?

- Condition S6 takes each of the six measures and defines how much is enough.
- If you comply with Condition S6, you will control pollution to the maximum extent practicable.



Public Education and Outreach

- Label inlets “Dump No Waste”
 - › People have to know where it is an inappropriate place to drain oil, wash cars, etc if they are going to avoid it.





Public Education and Outreach

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 - › People have to know where it is an inappropriate place to drain oil, wash cars, etc if they are going to avoid it.
- Education Material (Ports, Higher Ed.)
 - › Identify what kinds of pollution might get into your system and tell people why they should protect your system from those pollutants.



Public Education and Outreach

WHEN YOUR PET GOES ON THE LAWN,
REMEMBER IT DOESN'T JUST
GO ON THE LAWN.





Public Involvement

- Public Review of SWMP
 - › Let people know what is planned and review public comments on the planned SWMP
- Public Access to SWMP
 - › Provide upon request
 - › Post on website if you have one.



Illicit Discharge Detection and Elimination (IDDE)

- Prohibit Illicit Discharges
 - › Identify 'em
 - › Find 'em
 - › Eliminate 'em





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All non stormwater discharges are illicit but some are not so significant as others.



Construction Site Stormwater Runoff Control

- Comply with Ecology CSWGP and Local Jurisdiction stormwater requirements
- Coordinate with Ecology and or Local Jurisdiction to provide site access
- Train staff or hire trained contractors to maintain BMPs on construction sites



Post-Construction Stormwater Management for New Development and Redevelopment

A long title but a simple list

- Comply with local jurisdiction
- Coordinate with local jurisdiction



Pollution Prevention and Good Housekeeping for Municipal Operations

- Develop an Operation and Maintenance plan to prevent pollution
 - › Where does the dirt go when you wash it off?

Pollution Prevention and Good Housekeeping for Municipal Operations

WASHINGTON
DEPT.
E.C.





Pollution Prevention and Good Housekeeping for Municipal Operations

- Develop an Operation and Maintenance plan to prevent pollution
 - › Where does the dirt go when you wash it off?
 - › How are materials stored protected from stormwater?
 - › What chemicals do you use?



What about the Rest

- The six minimum measures for secondary permittees are in Special Condition 6 (S6)
- That is about 7 pages out of the 50
- Should you care about the other 40+?

You should know what is there.



What about the rest?

- S1 tells who is regulated and where
 - › Not a big deal once you decide the permit is appropriate.
- S2 describes what discharge are authorized

S1

pg 1

S2

pg 6



What about the rest?

- S3 describes what parts of the permit apply
 - › It tells you that S5 doesn't matter to secondary permittees
- S4 - compliance with standards
 - › Your stormwater should not cause a violation of WQS
 - › S4.F describes what happens when it does

S3

pg 7

S4

pg 7



What about the rest?

- S5 Is for cities and counties
 - S6 We have that one covered
 - S7 TMDLs/Appendix 2
 - › No special requirements for Secondary Permittees at this time
 - S8 Monitoring
 - › None required of Secondary Permittees
 - › Describe any that did take place
 - S9 Reporting/Appendix 4
 - › Annual Reports due in March
- | | |
|----|----------|
| S5 | pg 9 |
| S7 | EW pg 33 |
| | WW pg 30 |
| S8 | EW pg 34 |
| | WW pg 31 |
| S9 | EW pg 38 |
| | WW pg 34 |



The Fine Print

General Conditions

- Common sense required!
- Report when there is a problem
- G19 – Who can sign for your entity

AND Definitions



Timeline

4 ½ years to do it all

- Immediate
 - › Construction and Post Construction
 - Comply with Local jurisdiction regulations
 - › Good Housekeeping
 - Industrial Stormwater Coverage



Year One Timeline (up to Feb 08)

- IDDE
 - › Develop policies prohibiting illegal discharges and dumping
 - › Identify enforcement mechanisms

3 ½ years left for the rest



Year 1.5 Timeline (up to Aug 08)

- IDDE
 - › Develop and implement an enforcement plan

3 years left for the rest



Year 2 Timeline (up to Feb 09)

- IDDE
 - › Field inspections procedures for illicit discharges identification and elimination
 - › Begin inspections of 1/3 of outfalls each year

2 ½ years left for the rest



Year 2 Timeline (up to Feb 09)

- Illicit discharge



2 ½ years left for the rest



Year 3 Timeline (up to Feb 2010)

- Public Education and Outreach
 - › 50% of storm inlets labeled

1 ½ years left for the rest



Year 3 Timeline (up to Feb 2010)

- Public Education and Outreach
 - › 50% of inlets labeled
 - › Ports, Colleges and Universities
 - Education of tenants and residents

1 ½ years left for the rest

WHEN YOU'RE FERTILIZING THE LAWN,
REMEMBER YOU'RE NOT JUST
FERTILIZING THE LAWN.





Year 4.5 Timeline (up to Aug 2011)

- Public Education and Outreach
 - › 100% of inlets labeled
- Public Involvement
 - › Public comment on SWMP
- IDDE
 - › Storm drainage map
 - › Spill Response Plan

There is no rest



What should you start doing?

Apply

Comply

Pay permit fees

Begin documenting program

Funding the program

What must be completed in 2007

WASHINGTON STATE
DEPARTMENT OF
E C O L O G Y

Nada
Nothing
That's it!

Unless...



What *might* have to be submitted

- **If** it is known that your stormwater is causing a violation of water quality standards
 - › Report under S4.F
- **If** you know you are out of compliance with the permit
 - › Report under G20
- **Change** in Co-permittee or shared responsibility
 - › Revise NOI and/or Report under S1.D.3.d

What will be in the first annual report

- Answers to 20 questions
 - › Yes, No + comments
 - › Many will not be relevant
- Some will have a deadline after the end of the reporting period
 - › “Develop no later than one year after the effective date of this permit.”
 - › Check NO and report status if not yet complete.



Regional Contacts

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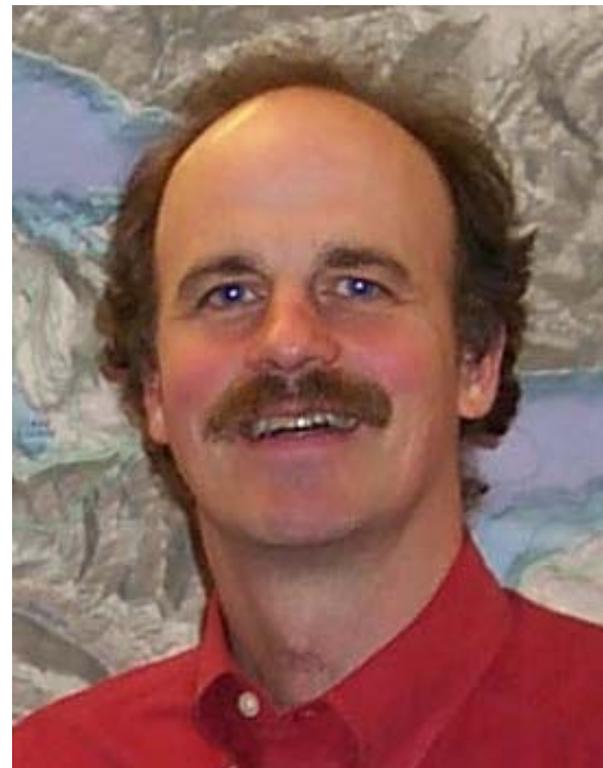
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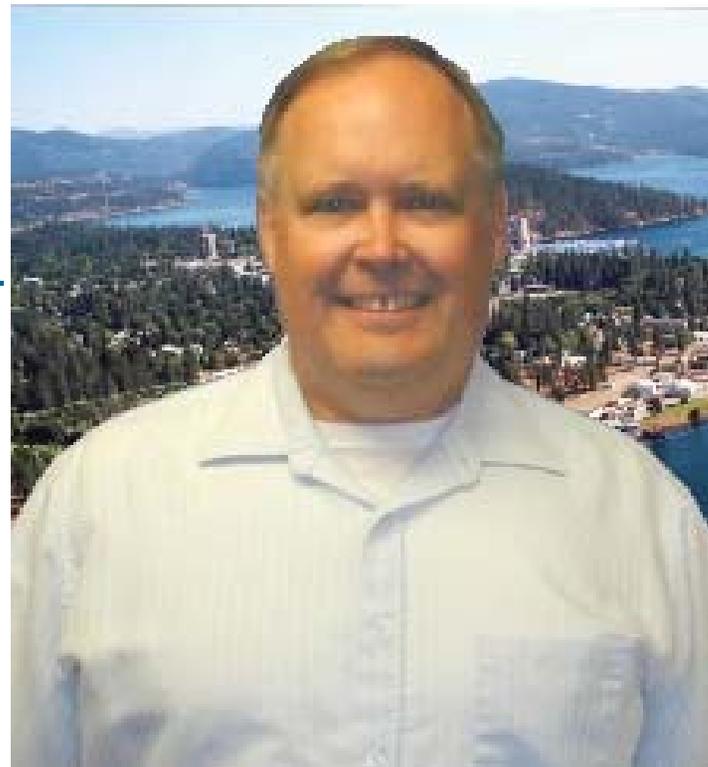
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Done!