**City of Tacoma NPDES Phase I Stormwater General Permit Coordination and Compliance Plan, <Insert City of Tacoma Department Here>**

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# **Coordination Plan Contacts - Who:**

* Environmental Services - Environmental Program Group – NPDES Section (EPG)
	+ Main Contact <Insert Main EPG Contact for Coordination>
* <Insert All Affected Parties as separate bullets.>
	+ Main Contact <Insert Main Contact for Other Groups>

# **Introduction**

**Background**

The City of Tacoma maintains a National Pollutant Discharge Elimination System Phase I Municipal Stormwater Permit (Permit). This Permit allows the City of Tacoma to discharge stormwater to receiving waterbodies. The City is required by the Washington State Department of Ecology to maintain this Permit. Nearly every department within the City of Tacoma plays a role in Permit implementation. This document describes the Permit sections that are most relevant to your department, how you play a role in those Permit sections, and describes when enhancements may be necessary to ensure Permit compliance. This document is meant to evolve over time and to be a tool to aid in coordination.

**EPG Technical Support**

EPG is happy to provide technical support for this coordination and compliance plan. Feel free to contact us for any questions, to provide Permit associated trainings, and/or any other Permit or stormwater related items.

**Relevant Permit Sections**

The following pages contain references to Permit sections that your group interacts with. In some instances, the Permit sections are verbatim while in other instances the Permit Sections have been paraphrased for ease of understanding the intent of the Permit section. The complete Phase I Municipal Stormwater Permit can be viewed at: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Municipal-Stormwater-Phase-I-Permit>.

The Who, What, When, Where, Why and How are presented in the following tables and pages to help groups understand their role in Permit compliance and to help further coordination efforts amongst various departments.

**EPA Tribal Permit Disclaimer:** The EPA Permit for discharge into Tribal Waters may affect Tacoma’s stormwater system (MS4) Permit Coverage Area and this work. This cannot be determined until the EPA Permit is complete.

# **S1.A – Geographic Area of Permit Coverage and S1.F**

Permit Language

S1.A: "This Permit covers discharges from large and medium Municipal Separate Storm Sewer Systems (MS4s), as established at Title 40 CFR 122.26, except for the Washington State Department of Transportation’s MS4s."

S1.F: “All MS4s owned or operated by Permittees named in S1.B and located in another city or county area requiring coverage under this Permit or either the Western Washington Phase II Municipal Stormwater Permit or the Eastern Washington Phase II Municipal Stormwater Permit are also covered under this Permit.”

Why is this relevant to my group?

Your department is fund responsible for and/or operates/maintains parcels within the geographic area of permit coverage (this may be referred to as owning those parcels in subsequent language). Attachment 1 contains a list of parcels that your department is fund responsible for and/or operates. The attachment contains two separate lists. The first list represents parcels of land that contain stormwater features. The second list are parcels that do not have stormwater components. The City of Tacoma Right-of-Way is considered part of the geographic area of permit coverage as well.

What is My Responsibility (How do I ensure Permit compliance)?

* Familiarize yourself with the parcels you own by reviewing the list in Attachment 1.
* Recognize that these parcels must comply with conditions of the Permit.

Coordination Plan

* EPG will inform you if they are aware of any changes in parcel ownership/operation on a yearly basis.
* ES – <Insert name of group> will inform EPG if they are aware of any changes in parcel ownership/operation on a yearly basis.

# **S5.A – Stormwater Management Program Development (SWMP) – Tracking**

Permit Language

“S5.A.2.   Each Permittee shall track the cost or estimated cost of development and implementation of each component of the SWMP. This information shall be provided to Ecology upon request.”

Why is this relevant to my group?

Your department implements certain components of the SWMP as described in this coordination plan (these will be the S5 Components described on the pages below).

What is My Responsibility (How do I ensure Permit compliance)?

* The ability to provide EPG costs or estimated costs of implementation of each component of the SWMP and provide this information to ES-EPG if asked.

Coordination Plan

* EPG-NPDES will work with <Insert name of group> to estimate cost of implementation as needed. <Insert name of group> does not have charge codes specific to Permit related activities – time is typically charges to specific projects.
* EPG will inform you of exact information that is needed and when.
* Information on cost estimates may be requested by Ecology at any time.

# **S5.C.2 - Mapping**

Permit Language

“S5.C.2: The SWMP shall include an ongoing program for mapping and documenting the MS4.”

Why is this relevant to my group?

Your department owns/operates parcels of land that contain MS4 components.

What is My Responsibility (How do I ensure Permit compliance)?

* Familiarize yourself with the City of Tacoma DART Map, AccessES, or tMap. These are all outward facing GIS interfaces that show the MS4 components. AccessES also shows private stormwater systems.
	+ AccessES is available here: <https://esgis.cityoftacoma.org/accesses/>
	+ City of Tacoma DART Map is available here: <https://www.tacomapermits.org/dart-map>
	+ City of Tacoma tMap is available here: <https://tmap.cityoftacoma.org/>
* If your group adds new stormwater features to any parcel that is not required to obtain a City of Tacoma Permit to do so – inform ES-EPG as soon as possible.

Coordination Plan

* ES-EPG coordinate with ES – AMG (Asset Management Group) to ensure the City GIS contains all necessary information.

# **S5.C.3 - Coordination**

Permit Language

“S5.C.: The SWMP shall include coordination mechanisms among departments within each jurisdiction to eliminate barriers to compliance with the terms of this Permit.”

Why is this relevant to my group?

Your department is responsible for ensuring compliance with the Permit.

What is My Responsibility (How do I ensure Permit compliance)?

* Familiarize yourself with the City of Tacoma Compliance with Ecology Phase I Municipal Stormwater Permit memo (Interdepartmental Coordination Memo) – See Attachment 2.
* Contact ES – EPG with Permit related questions.
* Review this coordination plan and suggest updates as necessary.

Coordination Plan

* ES-EPG will set up regular meetings with your group to discuss this coordination plan and other Permit related issues that may come up on an as-needed basis.

# **S5.C.5 – Controlling Runoff from New Development Redevelopment, and Construction Sites**

Not Exact Permit Language – Intent Language Only Shown

This Permit section is relevant to construction projects. The Permit requires certain projects to:

* Comply with the Stormwater Management Manual, which may include writing reports;
* Perform inspections before, during, and after work;
* Maintain inspection records; and
* Ensure all personnel completing work are properly trained.

Why is this relevant to my group?

Construction projects may occur on parcels of land you own/operate and work within the Right-of-Way.

What is My Responsibility (How do I ensure Permit compliance)?

* Understand when and how to obtain appropriate City of Tacoma Construction Permits.
* If work does not require City of Tacoma Permits, contact ES-EPG to see if stormwater mitigation is required. Stormwater mitigation is typically required in the following circumstances:
	+ The project disturbs 7,000 square feet of land, or
	+ The project adds or replaces 2,000 square feet of hard surface

Coordination Plan

* For work that does not require City of Tacoma Permits but requires compliance with this Permit section, ES-EPG will provide technical assistance regarding Stormwater Site Plan and Construction Stormwater Pollution Prevention Plan development.
* ES-EPG will set up regular meetings with your group to discuss this coordination plan and other Permit related issues that may come up on an as-needed basis.

# **S5.C.8 – Source Control**

Not Exact Permit Language – Intent Language Only Shown

This Permit section is intended to reduce the amount of pollutants that discharge into the stormwater system. The Permit requires:

* All lands apply Best Management Practices to pollutant generating surfaces. This includes items such as sweeping, labeling catch basins, conducting certain activities inside if necessary, and others based upon the specific pollutant sources.

Why is this relevant to my group?

* Activities conducted by your group or that occur on the parcels of land that you own or operate create pollutants.

What is My Responsibility (How do I ensure Permit compliance)?

* Understand the pollutant creating activities that your group does both on individual parcels and in the City ROW.
* Apply Best Management Practices to control pollutants.
* Attachment 3 contains a list of activities appropriate for your group and the associated BMPs from the City of Tacoma Stormwater Management Manual that should be used to control pollutants associated with those activities. The Best Management Practices can be found in Volume 6 of the City of Tacoma Stormwater Management Manual: www.cityoftacoma.org/stormwatermanual
* Train staff on required BMPs. This training is typically completed at the start of employment and once every 5 years.

Coordination Plan

* ES-EC completes annual inspections at needed sites.
* ES-EPG manages and maintains the City of Tacoma Stormwater Management Manual – for any questions – contact Mieke Hoppin at mhoppin@cityoftacoma.org or 253-502-2105.

ES-EPG will coordinate training requirements to ensure all appropriate staff are trained on the 5-year cycle. Open Space will ensure all new staff receive training.

# **S5.C.9 – Illicit Connections and Illicit Discharge Elimination**

Not Exact Permit Language – Intent Language Only Shown

This Permit section is intended to ensure spills and other illicit discharges are appropriately handled. The Permit requires:

* Procedures for reporting and correcting spills and illicit discharges.
* Training for all staff who may encounter spills and illicit discharges.

Note: The requirements of this section are also relevant to Permit Section G3 Reporting which has specific reporting requirements for spills and illicit discharges.

Why is this relevant to my group?

Your department may encounter spills and/or may spill materials during regular operations.

What is My Responsibility (How do I ensure Permit compliance)?

* Know how to identify a spill.
	+ “Spill – An unintended discharge of a pollutant or other substance that is not composed entirely of stormwater or of non-stormwater discharges allowed as specified in TMC 12.08 into the municipal stormwater system, groundwater, a receiving water, or ground surface.”
* Immediately clean up a spill if feasible. Feasibility is based upon staff safety, size of spill, and supplies.
* Know who to call for assistance with spill cleanup.
* Follow the NPDES Stormwater Permit Spill Reporting Requirement Flowchart. The flowchart is provided in Attachment 4 to this document for reference.
* Ensure all staff are trained on spill management.

Coordination Plan

* ES-EC will report all spills to necessary agencies and complete necessary documentation for the NPDES Permit.

ES-EPG will coordinate the Illicit Discharge Awareness/Spills training – which is required every two years.

# **S5.C.10 – Operation and Maintenance Program – Facility Maintenance**

Permit Language

“S5.C.10: Each Permittee shall implement and document a program to regulate maintenance activities and to conduct maintenance activities by the Permittee to prevent or reduce stormwater impacts.”

“S5.C.10.c.  Maintenance of stormwater facilities owned or operated by the Permittee

i.   Each Permittee shall implement a program to annually inspect all stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee. Permittees shall implement appropriate maintenance action(s) in accordance with adopted maintenance standards.

“S5.C.10.d.   Maintenance of Catch Basins Owned or Operated by the Permittee

i. Each Permittee shall annually inspect all catch basins and inlets owned or operated by the Permittee, or implement alternatives below.”

“S5.C.10.f.  Implement an ongoing training program for employees of the Permittee who have primary construction, operations, or maintenance job functions that may impact stormwater quality.”

Why is this relevant to my group?

Your department owns/operates parcels of land that contain stormwater features.

What is My Responsibility (How do I ensure Permit compliance)?

* Ensure inspect all catch basins on parcels of land you own/operate on an annual basis.
* Ensure catch basins are maintained if necessary.
* Ensure stormwater treatment and flow control facilities are maintained as necessary based upon ES-EC inspection.
* Maintain catch basin inspection records.
* Ensure materials removed during maintenance operations are properly disposed of (Permit Section G10 – Removed Substances).
* Ensure Permit required maintenance timelines are met:
	+ Within 1 year for typical maintenance of facilities, except catch basins.
	+ Within 6 months for catch basins.
	+ Within 2 years for maintenance that requires capital construction of less than $25,000.
* Provide ES-EPG catch basin inspection and maintenance records regularly.
* Provide ES-EPG stormwater treatment and flow control facilities maintenance records regularly.
* Train employees on inspection and maintenance of stormwater facilities.

Coordination Plan

* ES-Transmission will complete annual catch basin inspection, maintain catch basins or ensure maintenance of catch basins.
* ES-Transmission will maintain catch basin inspection records.
* ES-Transmission will maintain stormwater treatment and flow control facilities or ensure maintenance of such facilities by contracting with ES-Operations and Maintenance or Outside Contractors.
* AMG will ensure maintenance occurs within the required timelines described above and ensure sediment is properly disposed.
* ES-Transmission will maintain inspection and maintenance records.
* ES-EC will inspect all stormwater treatment and flow control facilities.
* ES-EC will inform ES-Transmission if maintenance is required for any stormwater treatment and/or flow control facilities.

# **S5.C.10 – Operation and Maintenance Program – Reducing Stormwater Impacts**

Permit Language

“S5.C.10.e.  Each Permittee shall implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. Lands owned or maintained by the Permittee include, but are not limited to: parking lots, streets, roads, highways, buildings, parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities.

The following activities shall be addressed:

i. Pipe cleaning

ii. Cleaning of culverts that convey stormwater in ditch systems

iii. Ditch maintenance

iv. Street cleaning

v. Road repair and resurfacing, including pavement grinding

vi. Snow and ice control

vii. Utility installation

viii. Maintaining roadside areas, including vegetation management

ix. Dust control

x. Pavement striping maintenance

xi. Application of fertilizers, pesticides, and herbicides according to the instructions for their use, including reducing nutrients and pesticides using alternatives that minimize environmental impacts

xii. Sediment and erosion control

xiii. Landscape maintenance and vegetation disposal

xiv. Trash and pet waste management

xv. Building exterior cleaning and maintenance”

“S5.C.10.f.  Implement an ongoing training program for employees of the Permittee who have primary construction, operations, or maintenance job functions that may impact stormwater quality.”

Why is this relevant to my group?

Your department owns/maintains lands or right-of-way owned by the City of Tacoma.

What is My Responsibility (How do I ensure Permit compliance)?

* Consider the activities that may occur on your site and activities that your group conducts in the right-of-way.
* Conduct activities in accordance with the City of Tacoma Utility Employee Stormwater Quality Best Management Practices Manual (BMP Manual). The BMP Manual is available here: <https://www.cityoftacoma.org/cms/One.aspx?portalId=169&pageId=147435>.
	+ If BMPs are not followed in accordance with the BMP Manual – provide ES-EPG with documentation as to how the maintenance activities are conducted such that stormwater is not affected.
* Ensure all staff are trained on the appropriate BMPs for the type of work performed. Training modules and instructions for informing Human Resources about training are available at the link below. Ensure staff are trained on all appropriate modules for the type of work that individual employee participates in. Ensure WCC also receive training – WCC crew training roster does not have to be submitted to HR. <https://www.cityoftacoma.org/cms/One.aspx?portalId=169&pageId=147435>
* Supervisory staff shall participate in the O&M user group facilitated by ES-EPG.
	+ If you are not currently receiving emails from this group – contact Ken Burkart at kburkart@cityoftacoma.org to be added to this list.
	+ Supervisory staff shall verify that crews are using appropriate BMPs. See information about reporting under BMP Collector App at: <https://www.cityoftacoma.org/cms/One.aspx?portalId=169&pageId=147435>

Coordination Plan

* ES-EPG manages the BMP Manual, O&M Users Group, and BMP App. If there are any issues/concerns with any items provided at: <https://www.cityoftacoma.org/cms/One.aspx?portalId=169&pageId=147435> contact Ken Burkart – kburkart@cityoftacoma.org

# **S9 – Reporting (See S5.C Sections Above for Specific Records)**

Permit Language

“S9.B.   Each Permittee is required to keep all records related to this Permit and the SWMP for at least five years.”

Why is this relevant to my group?

Your department is responsible for ensuring compliance with portions of the Permit as described above.

What is My Responsibility (How do I ensure Permit compliance)?

* Maintain records.
* Keep records.
* Supply any and all records to ES-EPG upon request.

# **Attachment 1 – List of Parcels You Own/Operate**

# **Table 1 –Source Control Selection Table**

**<delete items that are not relevant to a specific department, add additional items as needed>**

| **BMP**  | **Property/Site Type or Activity Type** | **Potential Pollutant(s) Associated with Activity or Pollutant that BMP is being used for.** |
| --- | --- | --- |
| BMP S100: Correcting Illicit Discharges to the Stormwater System | All commercial and industrial sites. | Wastewater, process water. |
| BMP S101: Labeling Stormwater Inlets | All commercial and industrial sites. | Wastes from dumping. |
| BMP S102: Formation of a Pollution Prevention team | All commercial and industrial sites. |   |
| BMP S103: Preventative Maintenance/Good Housekeeping | All commercial and industrial sites. |   |
| BMP S104: Spill Prevention and Cleanup | All commercial and industrial sites. | Leaks and spills of liquid and solid waste. |
| BMP S105: Employee Training | All commercial and industrial sites. |   |
| BMP S106: Inspections | All commercial and industrial sites. |   |
| BMP S107: Record Keeping | All commercial and industrial sites. |   |
| BMP S108: Washing Best Management Practices for All Activities | Outside washing of any kind and/or where washing activities may come into contact with precipitation or stormwater. | Toxic hydrocarbons, organic compounds, oils and greases, nutrients, heavy metals, pH, suspended solids, biochemical oxygen demand (BOD), chemical oxygen demand (COD), soaps, detergents, soluble organics |
| BMP S109: Cleaning or Washing of Tools, Equipment, and Machinery | Outside washing of tools, equipment or machinery and/or where washing may come into contact with precipitation or stormwater. | Toxic hydrocarbons, organic compounds, oils and greases, nutrients, heavy metals, pH, suspended solids, biochemical oxygen demand (BOD), chemical oxygen demand (COD) |
| BMP S110: Cleaning or Washing of Cooking Equipment | Outside washing of cooking equipment including floor mats and/or where washing may come into contact with precipitation or stormwater. | pH, oil and grease, nutrients, suspended solids, biochemical oxygen demand (BOD) |
| BMP S111: Cleaning Building Structures and Related Equipment | Outside washing of building structures including pressure washing of sidewalks, walkways, etc. and/or where washing may come into contact with precipitation or stormwater. | Heavy metals, pH, suspended solids, grit, paint chips, and biochemical oxygen demand (BOD) |
| BMP S112: Washing, Pressure Washing, and Steam Cleaning of Vehicles | Outside washing of vehicles, aircraft, vessels/boats, and construction vehicles like backhoes and/or where washing may come into contact with precipitation or stormwater. | Oil and grease, heavy metals, pH, suspended solids, soluble organics, soaps, detergents |
| BMP S113: Dock Washing | Dock washing. Not dry docks, graving docks, or marine railway cleaning operations. | Dirt, bird feces, soaps, detergents |
| BMP S114: Loading and Unloading Areas for Liquid and Solid Material | Loading and unloading of liquid and solid materials at industrial and commercial sites. | Fuel leaks and spills, oils, powders, organics, heavy metals, salts, acids, alkalis |
| BMP S115: Storage or Transfer (Outside) of Solid Raw Materials, By-Products or Finished Products | Outside storage or transfer of solid raw materials, by-products or finished products and/or where storage may come into contact with precipitation or stormwater. | Total suspended solids (TSS), BOD, organics, dissolved salts |
| BMP S116: Storage of Dry Pesticides and Fertilizers | Outside storage of dry pesticides and fertilizers and/or where storage may come into contact with precipitation or stormwater. | Pesticides and fertilizers |
| BMP S117: Storage of Solid Wastes and Food Wastes  | Outside storage of solid waste including ordinary garbage and/or where storage may come into contact with precipitation or stormwater. | Toxic organic compounds, oil and grease, heavy metals, nutrients, suspended solids, COD, BOD |
| BMP S118: Storage of Liquid, Food Waste or Dangerous Waste Containers | Outside storage of liquid, food waste, or dangerous waste containers and/or where storage may come into contact with precipitation or stormwater. | Oil and grease, acid/alkali, pH, BOD, metals |
| BMP S119: Storage of Liquids in Above-Ground Tanks | Outside storage of liquids in above-ground tanks and/or where storage may come into contact with precipitation or stormwater. | Oil and grease, organics, acid/alkali, heavy metals |
| BMP S120: Temporary Storage or Processing of Fruits or Vegetables | Outside storage and/or processing of fruits and vegetables or where processes may come into contact with precipitation or stormwater. | Nutrients, soil, color |
| BMP S121: Parking and Storage for Vehicles and Equipment | All properties where cars are parked. | Toxic hydrocarbons, organic compounds, oil and grease, metals, suspended solids |
| BMP S122: Fueling at Dedicated Stations | Onsite fueling from a stationary pump to mobile vehicle or equipment.  | Fuels, lube oil, radiator coolants, vehicle washwater |
| BMP S123: Mobile Fueling of Vehicles and Heavy Equipment | Fueling by tank trucks that are driven to the location. | Fuels, lubrication oils, fuel additives. |
| BMP S124: In-Water and Over-Water Fueling | Transfer of fuels from a stationary pump to vehicles or equipment in water or over water. | Fuels, lubrication oils, fuel additives. |
| BMP S125: Vehicle Maintenance Activities | All vehicle maintenance activities including mobile vehicle maintenance at construction sites. | Toxic hydrocarbons, toxic organic compounds, oil and grease, pH, heavy metals |
| BMP S126: Demolition  | Removal of existing building or other structures. | Toxic organic compounds, heavy metals, asbestos, suspended solids |
| BMP S127: Building Repair, Remodeling, and Construction | Activities associated with construction of buildings and other structures, remodeling, and general exterior repair work. | Toxic organics, suspended solids, heavy metals, asbestos, pH, oils, PCBs, grease |
| BMP S128: Roof and Building Drains  | Commercial and industrial sites with roofs. | Metals, solvents, acidic/alkaline pH, BOD, organics |
| BMP S129: Roof Vents | Processes that vent emissions to the roof and/or that may accumulate pollutants on the roof such as stone cutting, metal grinding, spray painting, paint stripping, galvanizing and electroplating. | Metal dust, grease, solvents, hydrocarbons, fines, stone dust |
| BMP S130: Manufacturing - Outside | Manufacturing takes place outside, has taken place outside or where inside operations may affect outside areas. | Toxic organic compounds, heavy metals, asbestos, suspended solids |
| BMP S131: Manufacturing and Post-Processing of Metal Products | Manufacturing or post-processing of metal products that occurs outside and/or where manufacturing or post-processing may come into contact with precipitation or stormwater. | Toxic organic compounds, heavy metals, oil and grease, pH, suspended solids, BOD |
| BMP S132: Painting, Finishing, and Coating of Vehicles, Boats, Buildings, and Equipment | Painting, finishing, and coating including surface preparation. | Organic compounds, oils and greases, heavy metals, and suspended solids |
| BMP S133: Concrete and Asphalt Mixing and Production at Stationary Sites | Mixing raw materials onsite to produce concrete or asphalt and subsequent uses such as pouring concrete structures and making other concrete or asphalt products. | Toxic hydrocarbons, toxic organic compounds, oils and greases, heavy metals, and pH |
| BMP S134: De-Icing and Anti-Icing Operations for Streets and Highways | Using de-icing and/or anti-icing products including use on streets and sidewalks. | Calcium magnesium acetate (CMA), calcium chloride, magnesium chloride, sodium chloride, urea, and potassium acetate |
| BMP S135: Streets | General maintenance and enhancement of streets. | Lawn clippings, sediment, vehicle liquids, tire wear residue, heavy metals, animal wastes, lawn chemicals, paint, and combustion by-products |
| BMP S136: Utility Corridors and Utility Vaults | Construction and maintenance of utility corridors such as pipeline and overheard power corridors and facilities and maintenance of above and below ground utility vaults. | Sediment, oil and grease, BOD, organics, PCBs, pesticides, and heavy metals |
| BMP S137: Maintenance of Ditches and Culverts | Maintenance of ditches and culverts that are designed for or can transport stormwater. | Litter, eroded soil, oils, vegetative particles, and heavy metals |
| BMP S138: Water Reservoir, Transmission Mainline, Wellhead, and Hydrant Flushing Activities | Operations of water infrastructure including emergency response activities. | Sediments, rust, turbidity and suspended solids, bacteria, and chlorinated water |
| S139: Stormwater System Maintenance | All properties with stormwater systems. | Excess sediment, oils, hydrocarbons and sediment |
| BMP S140: Dust Control at Disturbed Land Areas and Unpaved Roadways and Parking Lots | Properties and the ROW with disturbed land areas, unpaved driving surfaces and parking lots that may create dust. | Dust |
| BMP S141: Dust Control at Manufacturing Areas | Properties where product manufacturing and processing creates dust.  | Grain dust, sawdust, coal, gravel, crushed rock, cement, and boiler fly ash |
| BMP S142: Soil Erosion and Sediment Control at Commercial and Industrial Sites | Properties whose operations may cause erosion.  | Soil |
| BMP S143: Landscaping and Lawn/Vegetation Management | Properties and areas in the ROW that have landscaping and/or lawn areas. | Toxic organic compounds, heavy metals, oils, total suspended solids, coliform bacteria, fertilizers, and pesticides. |
| BMP S144: Pesticides and Integrated Pest Management | Properties and the ROW that may require the use of pesticides. | Pentachorophenol, carbamates, organometallics, and sediment |
| BMP S145: Fertilizer Application | Properties and the ROW that may use fertilizers for vegetation management. | Phosphorous, nitrogen, and coliform bacteria |
| BMP S146: Irrigation | Properties and ROW that use irrigation. | Chlorinated potable water, sediment |
| BMP S147: Commercial Animal Handling Areas | Properties that handle animals such as kennels, day care services, and veterinarians. | Coliform bacteria, nutrients, total suspended solids, and animal-related pharmaceuticals |
| BMP S148: Goose Waste | Area of properties or ROW with chronic accumulation of goose waste. | Nutrients, parasites |
| BMP S149: Pet Waste | Pet owners, property managers, and environmental stewards. | Nutrients, viruses, bacteria |
| BMP S167: Rooftop Dog Runs | Properties that provide uncovered rooftop or above ground plaza dog runs. | Nutrients, viruses, bacteria |
| BMP S150: Log Sorting and Handling | Storage, sorting, and handling logs for production into wood or paper products. | Oil and grease, BOD, settleable solids, total suspended solids (including soil), high and low pH, heavy metals, pesticides, wood-based debris, and leachate. |
| BMP S151: Wood Treatment Areas | Wood treatment including both anti-staining and wood preserving under pressure processes or by dipping or spraying. | Wood treating chemicals, BOD, suspended solids, oil and grease, benzene, toluene, ethylbenzene, phenol, chlorophenols, nitrophenols, heavy metals, and PAH |
| BMP S152: Color Events | Events that involve the use of powdered and/or liquid dyes. | Dye |
| BMP S153: Farmer's Markets | Farmer's Markets | Nutrients, soaps, grease, oil |
| BMP S154: Nurseries and Greenhouses | Commercial container plant, greenhouse grown, and cut foliage production. | Phosphorous, nitrogen, sediment, bacteria, organics |
| BMP S155: Recyclers and Scrap Yards | Reclamation of various materials for resale or scrap. | Oil and grease, ethylene and propylene glycol, total suspended solids, BOD, heavy metals, and acidic pH. |
| BMP S156: Commercial Composting | Commercial composting facilities operating outdoors without cover or when the operation may come into contact with precipitation or stormwater. | Nutrients, biochemical oxygen demand (BOD), organics, coliform bacteria, acidic pH, color, and suspended solids |
| BMP S157: Commercial Printing Operations | Commercial printing. | TSS, pH, heavy metals, oil and grease, and COD |
| BMP S158: Boat Building, Mooring, Maintenance, and Repair  | Properties that build, moor, and maintain boats. | TSS, oil and grease, organics, copper, lead, tin, and zinc |
| BMP S159: Swimming Pools, Spas, Hot Tubs, and Fountains | Properties with swimming pools, spas, hot tubs, and/or fountains for recreational and/or decorative purposes. | Nutrients, suspended solids, chlorine, pH, and chemical oxygen demand (COD) |
| BMP S160: Railroad Yards | Railroad yards. | Oil and grease, TSS, BOD, organics, pesticides, and metals |
| BMP S161: Well, Utility, Directional and Geotechnical Drilling | Drilling water wells and utilities, environmental protection and monitoring wells, and geotechnical borings that use machinery in the drilling. | Sediment, contaminated soil |
| BMP S162: Proper Disposal | Disposing of any liquid or solid waste. | Liquid and solid waste. |
| BMP S163: Cover the Activity with a Roof or Awning | Structural BMP to protect the activity from coming into contact with stormwater. |   |
| BMP S164: Cover the Activity with an Anchored Tarp or Plastic Sheet | Structural BMP designed to prevent precipitation and stormwater from reaching the activity or material. |   |
| BMP S165: Pave the Activity Area and Slope to a Sump, Holding Tank, or Oil/Water Separator | Structural BMP that applies to many activities that cannot be covered efficiently.  |   |
| BMP S166: Surround the Activity Area with a Curb, Dike, or Berm, or Elevate the Activity | Structural BMPs that prevent stormwater from reaching the activity area. |   |

# **Figure 1 - NPDES Stormwater Permit Spill Reporting Requirement Flowchart**

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# **Attachment 2 – Interdepartmental Coordination Memo**

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