



MEMORANDUM

TO: CITY OF DUPONT
FROM: DOMINIC MILLER, P.E. *DM*
KERRI SIDEBOTTOM, P.E.
DATE: OCTOBER 28, 2022
SUBJECT: DUPONT HOFFMAN HILL WELL PFAS
SYSTEM STORMWATER ANALYSIS
CITY OF DUPONT, PIERCE COUNTY,
WASHINGTON
G&O #21235

BACKGROUND

The City of DuPont is proposing to construct a new water treatment plant at the Hoffman Hill well site. The development will include several carbon vessels situated on a concrete pad, utility vaults, and installation of new water mains to connect to the existing well facility. The treatment plant will be constructed just east of the existing Hoffman Hill Well, Reservoir, and Booster Station. The installation of the water mains and other underground utilities is an exempt activity for stormwater purposes, as the overlying surfaces in these areas will be replaced in-kind.

The existing Hoffman Hill Well and Reservoir site includes stormwater conveyance that drains runoff from the site to the north into the City's system. This conveyance extends north to Hoffman Hill Boulevard, then north along Ridge View Drive and west along Sinclair Drive to outlet to a wetland near the City's western edge. The conveyance includes pipe ranging from 8-inch diameter to 24-inch diameter.

The following figures and documents are attached to this report:

FIGURES

1. Project Site.

ATTACHMENTS

1. Manual Flowcharts for Minimum Requirements.





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STORMWATER REQUIREMENTS

The City has adopted the 2019 version of the Department of Ecology Stormwater Management Manual for Western Washington (Manual). This memo documents the relevant stormwater requirements and the measures taken to satisfy these requirements.

EXISTING FACILITIES

The site includes a booster station building, well enclosure, water storage reservoir, and access road. The entire parcel covers an area of 1.77 acres, and existing impervious coverage on the site totals approximately 30,650 square feet, or approximately 40 percent of the site. All of this area is considered non-pollution generating, as the driveway is secured by a locking gate and is only accessed by maintenance personnel infrequently. The total land cover of the site is noted in Table 1.

The stormwater drainage appears to be functional at this time, and no drainage complaints associated with the existing site conveyance have been noted.

PROPOSED DEVELOPMENT

The proposed development includes the addition of a concrete pad, carbon treatment vessels, and a utility vault east of the existing site improvements.

Table 1 includes the existing and proposed site areas.

TABLE 1

Site Areas

Land Cover	Existing Areas	Proposed New Areas	Change
Parking, Driveway, Road ¹	15,131	15,495	+364
Sidewalk	0	0	0
Roof/Facility Pad	22,009	24,052	+2,043
Cleared, Lawn/Landscape	22,885	20,478	-2,407
Forested	17,240	17,240	0

1. Driveways and parking are considered nonpollution generating, as access to the site is secured and vehicle traffic is infrequent.



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Runoff from all of the new impervious surfaces will be collected and conveyed to the existing stormwater conveyance system on site, which discharges via the City's system to a wetland north of the site. Runoff modeling was not completed for this site, as the site is below the flow control threshold, as described below.

The project limits, or the total disturbed area, including the new hard surfaces and the utility trenching area to be resurfaced in-kind totals 10,550 square feet. The area associated with utility trenching is subject only to Minimum Requirement #2, and is therefore not considered in the evaluation of the minimum requirement thresholds. Without the utility trenching area, which is exempt from the stormwater requirements (aside from MR #2), the disturbed area totals approximately 6,650 square feet.

MINIMUM REQUIREMENTS

The project qualifies as a redevelopment project, as more than 35 percent of the land cover within the project area is currently impervious. More than 2,000 square feet of new plus replaced hard surface is proposed, and the disturbed area is less than 7,000 square feet. Per Figure I-3.2 in the Manual, the project is subject to Minimum Requirements #1-#5 for the new/replaced hard surfaces. Since the total area of new hard surface that is proposed is less than 5,000 square feet, and no significant conversion of native vegetation to lawn or pasture is proposed, no other requirements are mandated.

Minimum Requirement #1 – Preparation of Stormwater Site Plans

This memo serves to document the proposed stormwater controls for the project. The planset indicates the locations of all TESC and permanent stormwater management facilities.

Minimum Requirement #2 – Construction Stormwater Pollution Prevention Plan (SWPPP)

The Contractor will be responsible for preparing and maintaining the final SWPPP during construction.

Minimum Requirement #3 – Source Control of Pollution

Appropriate source controls will be installed on site to prevent pollution from entering stormwater during construction. No source control measures are anticipated to be necessary following construction aside from standard source control procedures that the City already practices. The following activity sheets are included in the O&M documentation attached to this report:



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- S410 BMPs for Correcting Illicit Discharges to Storm Drains
- S453 BMPs for Formation of a Pollution Prevention Team
- S454 BMPs for Preventative Maintenance/Good Housekeeping
- S455 BMPs for Spill Prevention and Cleanup
- S456 BMPs for Employee Training
- S457 BMPs for Inspections
- S458 BMPs for Record Keeping
- S431 BMPs for Washing and Steam Cleaning Vehicles/Equipment/Building Structures
- S415 BMPs for Maintenance of Public and Private Utility Corridors and Facilities
- S417 BMPs for Maintenance of Stormwater Drainage and Treatment Systems
- S411 BMPs for Landscaping and Lawn/Vegetation Management
- S442 BMPs for Labeling Storm Drain Inlets on Your Property

Construction stormwater pollution will be managed as described in the Contractor's SWPPP.

Minimum Requirement #4 – Preservation of Natural Drainage Systems and Outfalls

The soils in this location are highly permeable and there are no indications that channelized runoff flows offsite. The existing stormwater conveyance system will be maintained, which flows downslope to the north toward a regional infiltration pond. This is the direction in which runoff would naturally flow if there were no development on site, but it is likely that most runoff would infiltrate naturally.

Minimum Requirement #5 – On-Site Stormwater Management

The project triggers only Minimum Requirements #1-5, and List #1 is considered for the site. A small amount of new roof area is proposed. Dispersion is infeasible without first collecting the runoff from the proposed concrete pad and vault, as the new facilities are located in a low-lying area on site. Biofiltration and infiltration are not proposed, as the site is adjacent to a drinking water well. Permeable pavements are not suitable for the site, as the concrete pads must be designed to support the carbon vessels. BMP T5.13: Post-Construction Soil Quality and Depth will be applied to any disturbed pervious areas on site.



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OFFSITE ANALYSIS

The project is located within the Nisqually River-Frontal Puget Sound drainage basin, but there are no signs of surface runoff or channelization of flows on the project site. Runoff from this area would naturally flow to the north and west toward Puget Sound. The project area is on a local hill, and there is no indication that runoff from offsite could reach the site. Local soils generally infiltrate surface runoff well.

Currently, runoff from the hard surfaces on site is collected and conveyed north towards a wetland north of Sinclair Drive, and further northwest to the Sound. There are no apparent drainage problems within the site or downstream of the site.

The project will tie runoff from the proposed impervious areas to the existing system. A new 8-inch diameter storm drain will connect to the existing system.

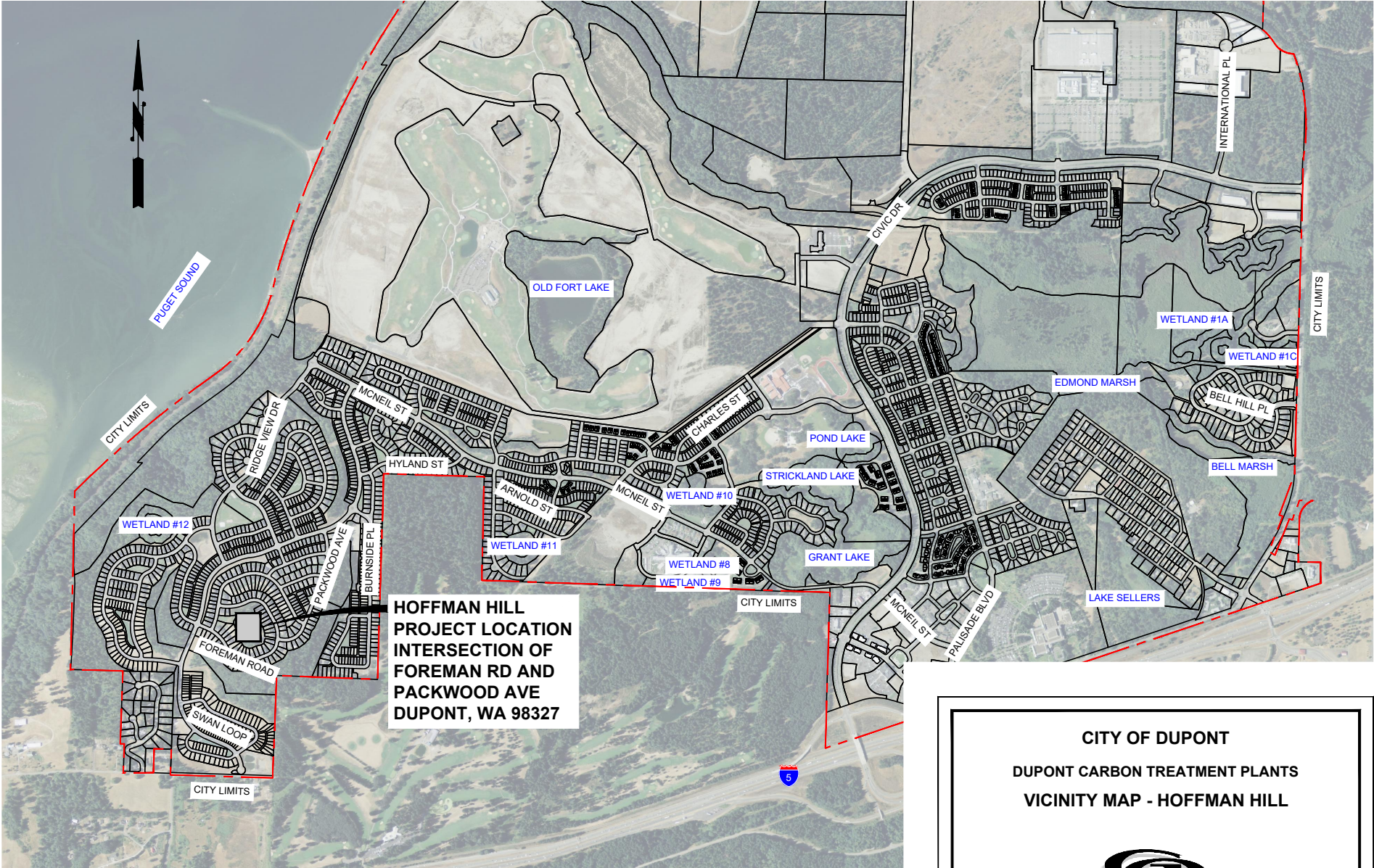
PFAS ANALYSIS

The project proposes running backwash water from the carbon treatment vessels into the on-site stormwater system. Raw water is used for the backwash process and is run through the vessels from bottom to top. The backwash water exits the vessels through the central valve skid and flows to the proposed catch basins connected to the existing storm system. Since the PFAS chemicals adsorb into the granulated activated carbon (GAC), no harmful chemicals are being introduced into the storm system by this system. The raw water running through the vessels will only pick up minor sediment present at the top layer of the GAC clogging up the carbon filtration system. For these reasons, no additional filtration or treatment will be required for backwash water entering into the storm system.



FIGURE 1

PROJECT VICINITY



CITY OF DUPONT
DUPONT CARBON TREATMENT PLANTS
VICINITY MAP - HOFFMAN HILL



Gray & Osborne, Inc.
CONSULTING ENGINEERS



ATTACHMENTS

- 1. Manual Flowcharts for Minimum Requirements.**
- 2. Source Control BMPs**



Figure I-3.1: Flow Chart for Determining Requirements for New Development

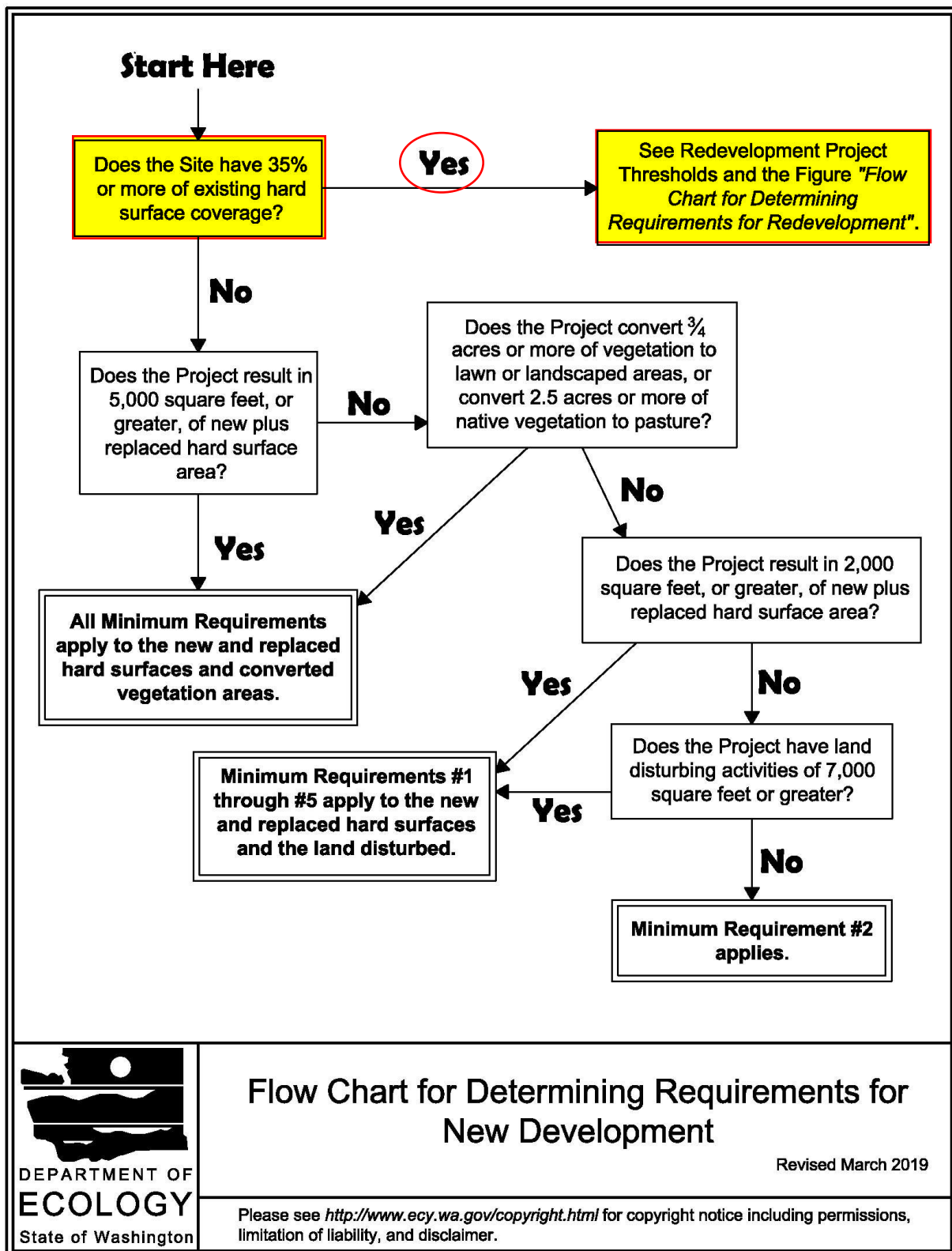


Figure I-3.2: Flow Chart for Determining Requirements for Redevelopment

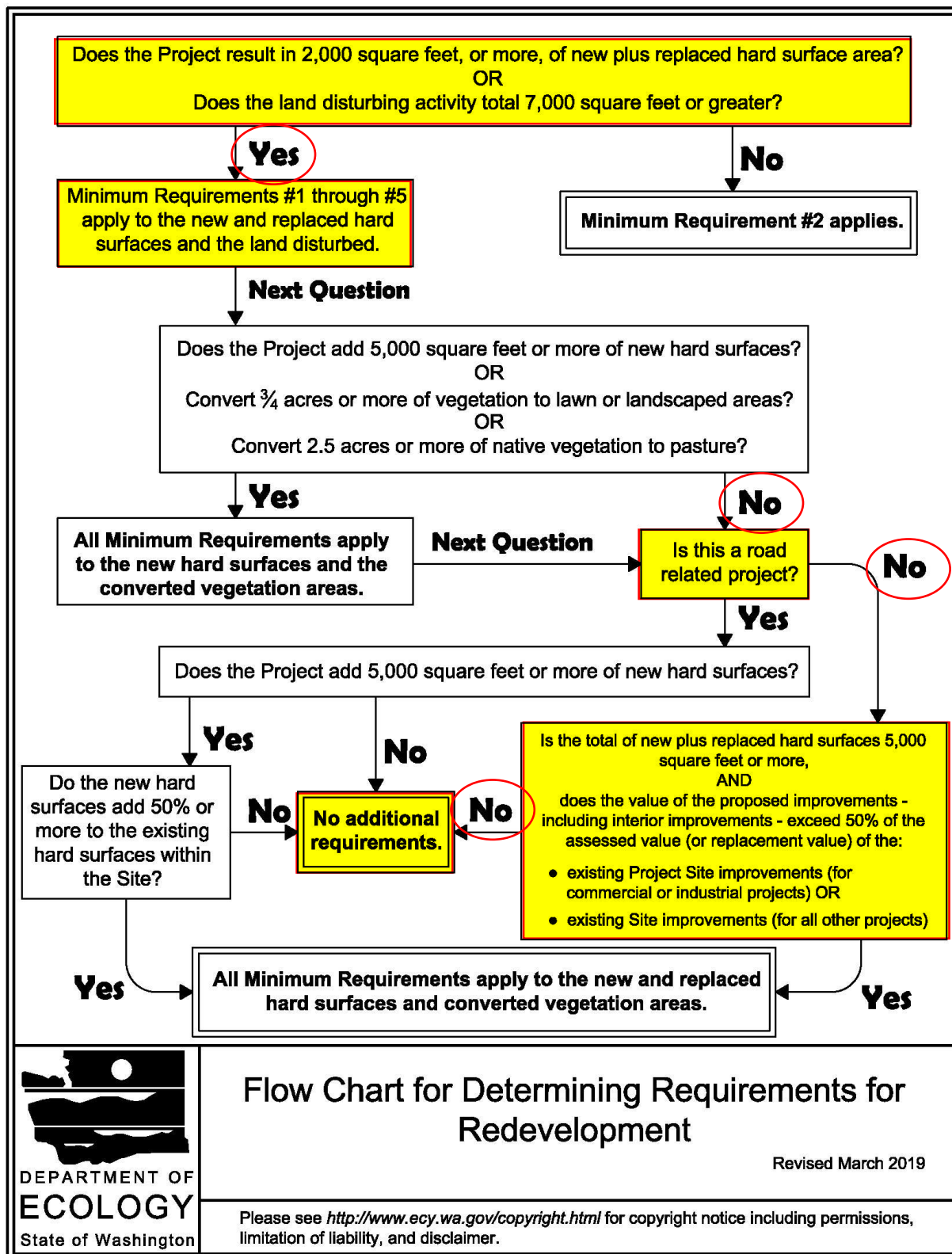
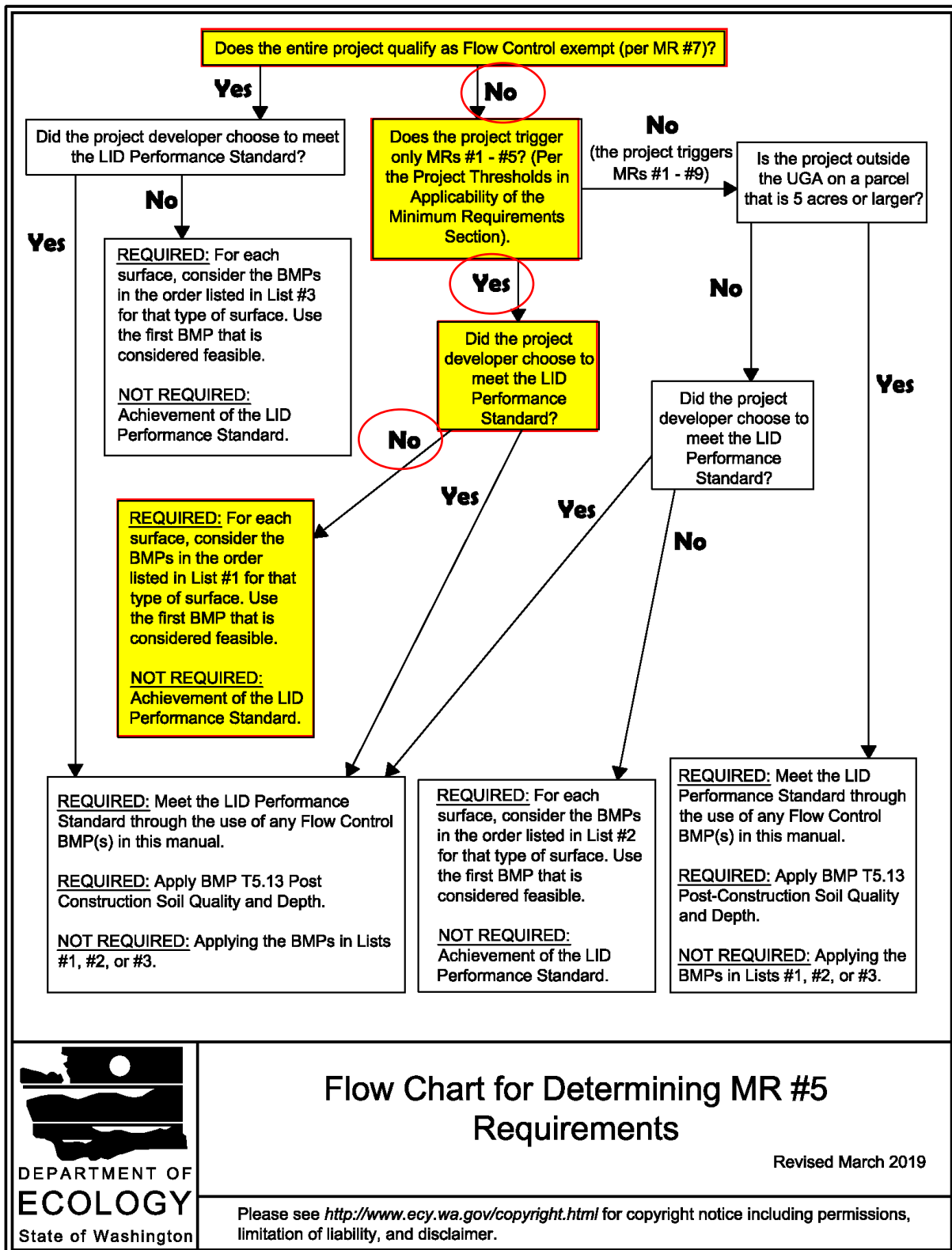


Figure I-3.3: Flow Chart for Determining MR #5 Requirements



S410 BMPs for Correcting Illicit Discharges to Storm Drains

Description of Pollutant Sources: Illicit discharges are unpermitted sanitary or process wastewater discharges to a storm sewer or to surface water, rather than to a sanitary sewer, industrial process wastewater, or other appropriate treatment. They can also include swimming pool water, filter backwash, cleaning solutions/washwaters, cooling water, etc. Experience has shown that illicit discharges are common, particularly in older buildings.

Pollutant Control Approach: Identify and eliminate unpermitted discharges or obtain an NPDES permit, where necessary, particularly at industrial and commercial facilities.

Applicable Operational BMPs:

- For all real properties, responsible parties must examine their plumbing systems to identify any potential illicit discharges. Review site plans, engineering drawings, or other sources of information for the plumbing systems on the property.
- If an illicit discharge is suspected, trace the source using an appropriate method such as visual reconnaissance, smoke test, flow test, dye test with a nontoxic dye, or closed circuit television (CCTV) inspection. These tests are to be performed by qualified personnel such as a plumbing contractor. Note: Contact Ecology prior to performing a dye test which may result in a discharge to a receiving water.
- If illicit connections are found, permanently plug or disconnect the connections.
- Eliminate prohibited discharges to storm sewer, ground water, or surface water.
- Convey unpermitted discharges to a sanitary sewer if allowed by the local sewer authority, or to other approved treatment.
- Obtain all necessary permits for altering or repairing side sewers and plumbing fixtures. Restrictions on certain types of discharges, particularly industrial process waters, may require pretreatment of discharges before they enter the sanitary sewer. It is the responsibility of the property owner or business operator to obtain the necessary permits and to replace the connection.
- Obtain appropriate state and local permits for these discharges.

Recommended Additional Operational BMPs:

At commercial and industrial facilities, conduct a survey of wastewater discharge connections to storm drains and to surface water as follows:

- Conduct a field survey of buildings, particularly older buildings, and other industrial areas to locate storm drains from buildings and paved surfaces. Note where these discharge.
- During non-stormwater conditions, inspect each storm drain for non-stormwater discharges. Record the locations of all non-stormwater discharges. Include all permitted discharges.
- If useful, prepare a map of each area. Show on the map the known location of storm sewers, sanitary sewers, and permitted and unpermitted discharges. Aerial photos may be useful. Check records such as piping schematics to identify known side sewer connections and show these on the map. Consider using smoke, dye, or chemical analysis tests to detect connections between two conveyance systems (e.g., process water and stormwater). If desirable, conduct TV inspections of the storm drains and record the footage on videotape.
- Compare the observed locations of connections with the information on the map and revise the map accordingly. Note suspect connections that are inconsistent with the field survey.
- Identify all connections to storm sewers or to surface water and take the actions specified above as applicable BMPs.

S453 BMPs for Formation of a Pollution Prevention Team

The pollution prevention team should be responsible for implementing and maintaining all BMPs and treatment for the site. This team should be able to address any corrective actions needed on site to mitigate potential stormwater contamination. The team members should:

- Consist of those people who are familiar with the facility and its operations.
- Possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at your facility, and who can evaluate the effectiveness of control measures.
- Assign pollution prevention team staff to be on duty on a daily basis to cover applicable permittee facilities when those facilities are in operation.
- Have the primary responsibility for developing and overseeing facility activities necessary to comply with stormwater requirements.
- Have access to all applicable permit, monitoring, SWPPP, and other records.
- Be trained in the operation, maintenance and inspections of all BMPs and reporting procedures.
- Establish responsibilities for inspections, operation, maintenance, and emergencies.
- Regularly meet to review overall facility operations and BMP effectiveness.

S454 BMPs for Preventive Maintenance / Good Housekeeping

Preventative maintenance and good housekeeping practices reduce the potential for stormwater to come into contact with pollutants and can reduce maintenance intervals for the drainage system and sewer system.

Applicable BMPs:

- Prevent the discharge of unpermitted liquid or solid wastes, process wastewater, and sewage to ground or surface water, or to storm drains that discharge to surface water, or to the ground. Conduct all oily parts cleaning, steam cleaning, or pressure washing of equipment or containers inside a building, or on an impervious contained area, such as a concrete pad. Direct contaminated stormwater from such an area to a sanitary sewer where allowed by local sewer authority, or to other approved treatment.
- Promptly contain and clean up solid and liquid pollutant leaks and spills including oils, solvents, fuels, and dust from manufacturing operations on an exposed soil, vegetation, or paved area.
- If a contaminated surface must be pressure washed, collect the resulting washwater for proper disposal (usually involves plugging storm drains, or otherwise preventing discharge and pumping or vactoring up washwater, for discharge to sanitary sewer or for vactor truck transport to a waste water treatment plant for disposal).
- Do not hose down pollutants from any area to the ground, storm drains, conveyance ditches, or receiving water. Convey pollutants before discharge to a treatment system approved by the local jurisdiction.
- Sweep all appropriate surfaces with vacuum sweepers quarterly, or more frequently as needed, for the collection and disposal of dust and debris that could contaminate stormwater. Use mechanical sweepers, and manual sweeping as necessary to access areas that a vacuum sweeper can't reach to ensure that all surface contaminants are routinely removed.
- Do not pave over contaminated soil unless it has been determined that ground water has not been and will not be contaminated by the soil. Call Ecology for assistance.
- Construct impervious areas that are compatible with the materials handled. Portland cement concrete, asphalt, or equivalent material may be considered.
- Use drip pans to collect leaks and spills from industrial/commercial equipment such as cranes at ship/boat building and repair facilities, log stackers, industrial parts, trucks and other vehicles stored outside.
- At industrial and commercial facilities, drain oil and fuel filters before disposal. Discard empty oil and fuel filters, oily rags, and other oily solid waste into appropriately closed and properly labeled containers, and in compliance with the Uniform Fire Code or International Building Code.
- For the storage of liquids use containers, such as steel and plastic drums, that are rigid and

durable, corrosion resistant to the weather and fluid content, non-absorbent, water tight, rodent-proof, and equipped with a close fitting cover.

- For the temporary storage of solid wastes contaminated with liquids or other potential polluted materials use dumpsters, garbage cans, drums, and comparable containers, which are durable, corrosion resistant, non-absorbent, non-leaking, and equipped with either a solid cover or screen cover to prevent littering. If covered with a screen, the container must be stored under a roof or other form of adequate cover.
- Where exposed to stormwater, use containers, piping, tubing, pumps, fittings, and valves that are appropriate for their intended use and for the contained liquid.
- Clean oils, debris, sludge, etc. from all stormwater facilities regularly, including catch basins, settling/detention basins, oil/water separators, boomed areas, and conveyance systems to prevent the contamination of stormwater. Refer to [Ecology Requirements for Generators of Dangerous Wastes](#) in [I-2.15 Other Requirements](#) for references to assist in handling potentially dangerous waste.
- Promptly repair or replace all substantially cracked or otherwise damaged paved secondary containment, high-intensity parking, and any other drainage areas, subjected to pollutant material leaks or spills. Promptly repair or replace all leaking connections, pipes, hoses, valves, etc., which can contaminate stormwater.
- Do not connect floor drains in potential pollutant source areas to storm drains, surface water, or to the ground.

Recommended BMPs:

- Where feasible, store potential stormwater pollutant materials inside a building or under a cover and/or containment.
- Minimize use of toxic cleaning solvents, such as chlorinated solvents, and other toxic chemicals.
- Use environmentally safe raw materials, products, additives, etc. such as substitutes for zinc used in rubber production.
- Recycle waste materials such as solvents, coolants, oils, degreasers, and batteries to the maximum extent feasible. Contact Ecology's *Hazardous Waste & Toxics Reduction Program* at <https://ecology.wa.gov/About-us/Get-to-know-us/Our-Programs/Hazardous-Waste-Toxics-Reduction> for recommendations on recycling or disposal of vehicle waste liquids and other waste materials.
- Empty drip pans immediately after a spill or leak is collected in an uncovered area.
- Stencil warning signs at stormwater catch basins and drains, e.g., “Dump no waste – Drains to waterbody”.
- Use solid absorbents, e.g., clay and peat absorbents and rags for cleanup of liquid spills/leaks, where practicable.
- Promptly repair/replace/reseal damaged paved areas at industrial facilities.

- Recycle materials, such as oils, solvents, and wood waste, to the maximum extent practicable.

Note: Evidence of stormwater contamination by oils and grease can include the presence of visible sheen, color, or turbidity in the runoff, or present or historical operational problems at the facility. Operators can use simple pH tests, for example with litmus or pH paper. These tests can screen for high or low pH levels (anything outside a 6.5-8.5 range) due to contamination in stormwater.

S455 BMPs for Spill Prevention and Cleanup

Description of Pollutant Sources: Spills and leaks can damage public infrastructure, interfere with sewage treatment, and cause a threat to human health or the environment. Spills are often preventable if appropriate chemical and waste handling techniques are practiced effectively and the spill response plan is immediately implemented. Additional spill control requirements may be required based on the specific activity occurring on site.

Applicable BMPs:

Spill Prevention

- Clearly label or mark all containers that contain potential pollutants.
- Store and transport liquid materials in appropriate containers with tight-fitting lids.
- Place drip pans underneath all containers, fittings, valves, and where materials are likely to spill or leak.
- Use tarpaulins, ground cloths, or drip pans in areas where materials are mixed, carried, and applied to capture any spilled materials.
- Train employees on the safe techniques for handling materials used on the site and to check for leaks and spills.

Spill Plan

- Develop and implement a spill plan and update it annually or whenever there is a change in activities or staff responsible for spill cleanup. Post a written summary of the plan at areas with a high potential for spills, such as loading docks, product storage areas, waste storage areas, and near a phone. The spill plan may need to be posted at multiple locations. Describe the facility, including the owner's name, address, and telephone number; the nature of the facility activity; and the general types of chemicals used at the facility.
- Designate spill response employees to be on-site during business activities. Provide a current list of the names and telephone numbers (home and office) of designated spill response employees who are responsible for implementing the spill plan.
- Provide a site plan showing the locations of storage areas for chemicals, inlets/catch basins, spill kits and other relevant infrastructure or materials information.
- Describe the emergency cleanup and disposal procedures. Note the location of all spill kits in

the spill plan.

- List the names and telephone numbers of public agencies to contact in the event of a spill.

Spill Cleanup Kits

- Store all cleanup kits near areas with a high potential for spills so that they are easily accessible in the event of a spill. The contents of the spill kit must be appropriate to the types and quantities of materials stored or otherwise used at the facility, and refilled when the materials are used. Spill kits must be located within 25 feet of all fueling/fuel transfer areas, including on-board mobile fuel trucks.

Note: Ecology recommends that the kit(s) include salvage drums or containers, such as high density polyethylene, polypropylene or polyethylene sheet-lined steel; polyethylene or equivalent disposal bags; an emergency response guidebook; safety gloves/clothes/equipment; shovels or other soil removal equipment; and oil containment booms and absorbent pads; all stored in an impervious container.

Spill Cleanup and Proper Disposal of Waste

- Stop, contain, and clean up all spills immediately upon discovery.
- Implement the spill plan immediately.
- Contact the designated spill response employees.
- Block off and seal nearby inlets/catch basins to prevent materials from entering the drainage system or combined sewer.
- Use the appropriate material to clean up the spill.
- Do not use emulsifiers or dispersants such as liquid detergents or degreasers unless disposed of properly. Emulsifiers and dispersants are not allowed to be used on surface water, or in a place where they may enter storm drains, surface waters, treatments systems, or sanitary sewers.
- Immediately notify Ecology and the local jurisdiction if a spill has reached or may reach a sanitary or storm sewer, ground water, or surface water. Notification must comply with state and federal spill reporting requirements.
- Do not wash absorbent material into interior floor drains or inlets/catch basins.
- Place used spill control materials in appropriate containers and dispose of according to regulations.

S456 BMPs for Employee Training

Train all employees that work in pollutant source areas about the following topics:

- Identifying Pollution Prevention Team Members.
- Identifying pollutant sources.

- Understanding pollutant control measures.
- Spill prevention and response.
- Emergency response procedures.
- Handling practices that are environmentally acceptable. Particularly those related to vehicle/equipment liquids such as fuels, and vehicle/equipment cleaning.

Additional specialized training may be needed for staff who will be responsible for handling hazardous materials.

S457 BMPs for Inspections

Qualified personnel shall conduct inspections monthly. Make and maintain a record of each inspection on-site. The following requirements apply to inspections:

- Be conducted by someone familiar with the facility's site, operations, and BMPs.
- Verify the accuracy of the pollutant source descriptions in the SWPPP.
- Assess all BMPs that have been implemented for effectiveness and needed maintenance and locate areas where additional BMPs are needed.
- Reflect current conditions on the site.
- Include written observations of the presence of floating materials, suspended solids, oil and grease, discoloration, turbidity and odor in the stormwater discharges; in outside vehicle maintenance/repair; and liquid handling, and storage areas. In areas where acid or alkaline materials are handled or stored use a simple litmus or pH paper to identify those types of stormwater contaminants where needed.
- Eliminate or obtain a permit for unpermitted non-stormwater discharges to storm drains or receiving waters, such as process wastewater and vehicle/equipment washwater.
- Identify actions to address inspection deficiencies.

S458 BMPs for Record Keeping

See the applicable permit for specific record-keeping requirements and retention schedules for the following reports. At a minimum, retain the following reports for five years:

- Inspection reports which should include:
 - Time and date of the inspection
 - Locations inspected
 - Statement on status of compliance with the permit
 - Summary report of any remediation activities required
 - Name, title, and signature of person conducting the inspection

- Reports on spills of oil or hazardous substances in greater than Reportable Quantities (Code of Federal Regulations Title 40 Parts 302.4 and 117). Report spills of the following: antifreeze, oil, gasoline, or diesel fuel, that cause:
 - A violation of the State of Washington's Water Quality Standards.
 - A film or sheen upon or discoloration of the waters of the State or adjoining shorelines.
 - A sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

To report a spill or to determine if a spill is a substance of a Reportable Quantity, call the Ecology regional office and ask for an oil spill operations or a dangerous waste specialist:

- Northwest Region (425)649-7000
- Southwest Region (360)407-6300
- Eastern Region (509)329-3400
- Central Region (509) 575-2490

In addition, call the Washington Emergency Management Division at 1-800-258-5990 or 1-800-OILS-911 AND the National Response Center at 1-800-424-8802.

Also, refer to *Focus on Emergency Spill Response* ([Ecology, 2009](#)).

The following is additional recommended record keeping:

Maintain records of all related pollutant control and pollutant generating activities such as training, materials purchased, material use and disposal, maintenance performed, etc.

S431 BMPs for Washing and Steam Cleaning Vehicles / Equipment / Building Structures

Description of Pollutant Sources: Pollutant sources include the commercial cleaning of vehicles, aircraft, vessels, and other transportation, restaurant kitchens, carpets, and industrial equipment, and large buildings with low- or high-pressure water or steam. This includes “charity” car washes at gas stations and commercial parking lots. The cleaning can include hand washing, scrubbing, sanding, etc. Washwater from cleaning activities can contain oil and grease, suspended solids, heavy metals, soluble organics, soaps, and detergents that can contaminate stormwater.

Permitting Requirements: Obtain all necessary permits for installing, altering, or repairing onsite drainage and side sewers. Restrictions on certain types of discharges may require pretreatment before they enter the sanitary sewer.

Pollutant Control Approach: The preferred approach is to cover and/or contain the cleaning activity, or conduct the activity inside a building, to separate the uncontaminated stormwater from the washwater sources. Convey washwater to a sanitary sewer after approval by the local sewer authority. Provide temporary storage before proper disposal, or recycling. Under this preferred approach, no discharge to the ground, to a storm drain, or to surface water should occur.

The Industrial Stormwater General Permit prohibits the discharge of process wastewater (e.g., vehicle washing wastewater) to ground water or surface water. Stormwater that commingles with process wastewater is considered process wastewater.

Facilities not covered under the Industrial Stormwater General Permit that are unable to follow one of the preferred approaches listed above may discharge washwater to the ground only after proper treatment in accordance with *Vehicle and Equipment Washwater Discharges Best Management Practices Manual* ([Ecology, 2012](#)).

The quality of any discharge to the ground after proper treatment must comply with Ecology's Ground Water Quality Standards, [Chapter 173-200 WAC](#).

Facilities not covered under the Industrial Stormwater General Permit that are unable to comply with one of the preferred approaches and want to discharge to storm sewer, must meet their local stormwater requirements. Local authorities may require treatment prior to discharge.

Contact the local Ecology Regional Office to discuss permitting options for discharge of washwater to surface water or to a storm drain after on-site treatment.

Applicable Structural Source Control BMPs:

Conduct vehicle/equipment washing in one of the following locations:

- At a commercial washing facility in which the washing occurs in an enclosure and drains to the sanitary sewer, or

- In a building constructed specifically for washing of vehicles and equipment, which drains to a sanitary sewer.

Conduct outside washing operations in a designated wash area with the following features:

- In a paved area, construct a spill containment pad to prevent the run-on of stormwater from adjacent areas. Slope the spill containment area to collect washwater in a containment pad drain system with perimeter drains, trench drains or catchment drains. Size the containment pad to extend out a minimum of four feet on all sides of the washed vehicles and/or equipment.
- Convey the washwater to a sump (like a grit separator) and then to a sanitary sewer (if allowed by the local Sewer Authority), or other appropriate wastewater treatment or recycle system. The containment sump must have a positive control outlet valve for spill control with live containment volume, and oil/water separation. Size the minimum live storage volume to contain the maximum expected daily washwater flow plus the sludge storage volume below the outlet pipe. Shut the outlet valve during the washing cycle to collect the washwater in the sump. The valve should remain shut for at least two hours following the washing operation to allow the oil and solids to separate before discharge to a sanitary sewer.
- Use a two way valve for discharges from the containment pad. This valve should be normally switched to direct water to treatment, but may be switched to the drainage system after that pad is clean to handle stormwater runoff. The stormwater can then drain into the conveyance/discharge system outside of the wash pad (essentially bypassing the sanitary sewer or recycle system). Post signs to inform people of the operation and purpose of the valve. Clean the concrete pad thoroughly until there is no foam or visible sheen in the washwater prior to closing the inlet valve and allowing uncontaminated stormwater to overflow and drain off the pad.

Note that the purpose of the valve is to convey only washwater and contaminated stormwater to a treatment system.

- Collect the washwater from building structures and convey it to appropriate treatment such as a sanitary sewer system if it contains oils, soaps, or detergents. If the washwater does not contain oils, soaps, or detergents (in this case only a low pressure, clean, cold water rinse is allowed) then it could drain to soils that have sufficient natural attenuation capacity for dust and sediment.
- Sweep surfaces prior to cleaning/washing to remove excess sediment and other pollutants.
- If roof equipment or hood vents are cleaned, ensure that no washwater or process water is discharged to the roof drains or drainage systems.
- Label all mobile cleaning equipment as follows: "Properly dispose of all wastewater. Do not discharge to an inlet/catch basin, ditch, stream, or on the ground."

Recommended Additional BMPs:

- Mark the wash area at gas stations, multifamily residences and any other business where non-employees wash vehicles.

- Operators may use a manually operated positive control valve for uncovered wash pads, but a pneumatic or electric valve system is preferable. The valve may be on a timer circuit and opened upon completion of a wash cycle. After draining the sump or separator, the timer would then close the valve.
- Minimize the use of water and detergents in washing operations when practicable.
- Use phosphate-free biodegradable detergents when practicable.
- Use the least hazardous cleaning products available.
- Consider recycling the washwater.

Operators may use soluble/emulsifiable detergents in the wash medium and should use it with care and the appropriate treatment. Carefully consider the selection of soaps and detergents and treatment BMPs. Oil/water separators are ineffective in removing emulsified or water soluble detergents. Another treatment appropriate for emulsified and water soluble detergents may be required.

Exceptions:

- At gas stations (for charity car washes) or commercial parking lots, where it is not possible to discharge the washwater to a sanitary sewer, a temporary plug or a temporary sump pump can be used at the storm drain to collect the washwater for off-site disposal such as to a nearby sanitary sewer.
- New and used car dealerships may wash vehicles in the parking stalls as long as employees use a temporary plug system to collect the washwater for disposal as stated above, or an approved treatment system for the washwater is in place.

At industrial sites, contact Ecology for NPDES Permit requirements even when not using soaps, detergents, and/or other chemical cleaners in washing trucks.

S415 BMPs for Maintenance of Public and Private Utility Corridors and Facilities

Description of Pollutant Sources: Corridors and facilities at petroleum product pipelines, natural gas pipelines, water pipelines, electrical power transmission corridors, and rights-of-way can be sources of pollutants such as herbicides used for vegetation management, and eroded soil particles from unpaved access roads. At pump stations, waste materials generated during maintenance activities may be temporarily stored outside. Additional potential pollutant sources include the leaching of

preservatives from wood utility poles, PCBs in older transformers, water removed from underground transformer vaults, and leaks/spills from petroleum pipelines. The following are potential pollutants: oil and grease, TSS, BOD, organics, PCBs, pesticides, and heavy metals.

Pollutant Control Approach: Implementation of spill control plans as well as control of fertilizer and pesticide applications, soil erosion, and site debris that can contaminate stormwater.

Applicable Operational BMPs:

- Minimize the amount of herbicides and other pesticides used to maintain access roads and facilities.
- Implement [S411 BMPs for Landscaping and Lawn / Vegetation Management](#).
- Comply with [WSDA Pesticide Regulations](#) (see [I-2.15 Other Requirements](#)).
- When removing water or sediments from electric transformer vaults, determine the presence of contaminants before disposing of the water and sediments.
 - This includes inspecting for the presence of oil or sheen, and determining from records or testing if the transformers contain PCBs.
 - If records or tests indicate that the sediments or water are contaminated above applicable levels, manage these media in accordance with applicable federal and state regulations, including the federal PCB rules (40 CFR 761) and the state MTCA cleanup regulations ([Chapter 173-340 WAC](#)).
 - Water removed from the vaults can be discharged in accordance with the federal 40 CFR 761.79, and state regulations ([Chapter 173-201A WAC](#) and [Chapter 173-200 WAC](#)), or via the sanitary sewer if the requirements, including applicable permits, for such a discharge are met. (See also [Requirements for Stormwater Discharges to Public Sanitary Sewers, Septic Systems, Dead-End Sumps, and Industrial Waste Treatment Systems](#) and [Ecology Requirements for Generators of Dangerous Wastes in I-2.15 Other Requirements](#)).
- Stabilize access roads or areas of bare ground with gravel, crushed rock, or another method to prevent erosion. Use and manage vegetation to minimize bare ground/soils that may be susceptible to erosion.
- Provide maintenance practices to prevent stormwater from accumulating and draining across and/or onto roadways. Convey stormwater through roadside ditches and culverts. The road should be crowned, outsloped, water barred, or otherwise left in a condition not conducive to erosion. Appropriately maintaining grassy roadside ditches discharging to surface waters is an effective way of removing some pollutants associated with sediments carried by stormwater.
- Maintain ditches and culverts at an appropriate frequency to ensure that plugging and flooding across the roadbed, with resulting overflow erosion, does not occur.
- Apply the appropriate BMPs in this Volume for the storage of waste materials that can contaminate stormwater.

Recommended Operational BMPs:

- When selecting utility poles for a specific location, consider the potential environmental effects of the pole or poles during storage, handling, and end-use, as well as its cost, safety, efficacy, and expected life. Use wood products treated with chemical preservatives made in accordance with generally accepted industry standards such as the American Wood Preservers Association Standards (see <http://www.awpa.com/standards/>). Consider alternative materials or technologies if placing poles in or near an environmentally sensitive area, such as a wetland or a drinking water well. Alternative technologies include poles constructed with material (s) other than wood such as fiberglass composites, metal, or concrete. Consider other technologies and materials, such as sleeves or caissons for wood poles, when they are determined to be practicable and available.
- As soon as practicable remove all litter from wire cutting/replacing operations.
- Implement temporary erosion and sediment control in areas cleared of trees and vegetation and during the construction of new roads.

S417 BMPs for Maintenance of Stormwater Drainage and Treatment Systems

Description of Pollutant Sources: Facilities include roadside catch basins on arterials and within residential areas, conveyance systems, detention facilities such as ponds and vaults, oil/water separators, biofilters, settling basins, infiltration systems, and all other types of stormwater treatment systems presented in [Volume V](#). Oil and grease, hydrocarbons, debris, heavy metals, sediments and contaminated water are found in catch basins, oil and water separators, settling basins, etc.

Pollutant Control Approach: Provide maintenance and cleaning of debris, sediments, and other pollutants from stormwater collection, conveyance, and treatment systems to maintain proper operation.

Applicable Operational BMPs:

Maintain stormwater treatment facilities per the operations and maintenance (O&M) procedures presented in [Appendix V-A: BMP Maintenance Tables](#) in addition to the following BMPs:

- Inspect and clean treatment BMPs, conveyance systems, and catch basins as needed, and determine necessary O&M improvements.
- Promptly repair any deterioration threatening the structural integrity of stormwater facilities. These include replacement of clean-out gates, catch basin lids, and rock in emergency spillways.
- Ensure adequacy of storm sewer capacities and prevent heavy sediment discharges to the sewer system.
- Regularly remove debris and sludge from BMPs used for peak-rate control, treatment, etc. and discharge to a sanitary sewer if approved by the sewer authority, or truck to an appropriate local or state government approved disposal site.
- Clean catch basins when the depth of deposits reaches 60 percent of the sump depth as measured from the bottom of basin to the invert of the lowest pipe into or out of the basin. However, in no case should there be less than six inches clearance from the debris surface to the invert of the lowest pipe. Some catch basins (for example, WSDOT's *Catch Basin Type 1L* ([WSDOT, 2011](#))) may have as little as 12 inches sediment storage below the invert. These catch basins need frequent inspection and cleaning to prevent scouring. Where these catch basins are part of a stormwater collection and treatment system, the system owner/operator may choose to concentrate maintenance efforts on downstream control devices as part of a systems approach.
- Properly dispose of all solids, polluted material, and stagnant water collected through system cleaning. Do not decant water back into the drainage system from eductor trucks or vacuum equipment since there may be residual contaminants in the cleaning equipment. Do not jet material downstream into the public drainage system.
- Clean woody debris in a catch basin as frequently as needed to ensure proper operation of the catch basin.
- Post warning signs; “Dump No Waste - Drains to Ground Water,” “Streams,” “Lakes,” or emboss on or adjacent to all storm drain inlets where possible.
- Disposal of sediments and liquids from the catch basins must comply with [Appendix IV-B: Management of Street Waste Solids and Liquids](#).

S411 BMPs for Landscaping and Lawn / Vegetation Management

Description of Pollutant Sources: Landscaping can include grading, soil transfer, vegetation planting, and vegetation removal. Examples include weed control on golf course lawns, access roads, and utility corridors and during landscaping; and residential lawn/plant care. Proper management of vegetation can minimize excess nutrients and pesticides.

Pollutant Control Approach: Maintain appropriate vegetation to control erosion and the discharge of stormwater pollutants. Prevent debris contamination of stormwater. Where practicable, grow plant species appropriate for the site, or adjust the soil properties of the site to grow desired plant species.

Applicable BMPs:

- Install engineered soil/landscape systems to improve the infiltration and regulation of stormwater in landscaped areas.
- Select the right plants for the planting location based on proposed use, available maintenance, soil conditions, sun exposure, water availability, height, sight factors, and space available.
- Ensure that plants selected for planting are not on the noxious weed list. For example, butterfly bush often gets planted as an ornamental but is actually on the noxious weed list.

The Washington State Noxious Weed List can be found at the following webpage:

<https://www.nwcb.wa.gov/printable-noxious-weed-list>

- Do not dispose of collected vegetation into waterways or storm sewer systems.
- Do not blow vegetation or other debris into the drainage system.
- Dispose of collected vegetation such as grass clippings, leaves, sticks by composting or recycling.
- Remove, bag, and dispose of class A & B noxious weeds in the garbage immediately.
- Do not compost noxious weeds as it may lead to spreading through seed or fragment if the composting process is not hot enough.
- Use manual and/or mechanical methods of vegetation removal (pincer-type weeding tools, flame weeders, or hot water weeders as appropriate) rather than applying herbicides, where practical.
- Use at least an eight-inch "topsoil" layer with at least 8 percent organic matter to provide a sufficient vegetation-growing medium.
 - Organic matter is the least water-soluble form of nutrients that can be added to the soil. Composted organic matter generally releases only between 2 and 10 percent of its total nitrogen annually, and this release corresponds closely to the plant growth cycle. Return natural plant debris and mulch to the soil, to continue recycling nutrients indefinitely.
- Select the appropriate turfgrass mixture for the climate and soil type.
 - Certain tall fescues and rye grasses resist insect attack because the symbiotic endophytic fungi found naturally in their tissues repel or kill common leaf and stem-eating lawn insects.

- The fungus causes no known adverse effects to the host plant or to humans.
- Tall fescues and rye grasses do not repel root-feeding lawn pests such as Crane Fly larvae.
- Tall fescues and rye grasses are toxic to ruminants such as cattle and sheep
- Endophytic grasses are commercially available; use them in areas such as parks or golf courses where grazing does not occur.
- Local agricultural or gardening resources such as Washington State University Extension office can offer advice on which types of grass are best suited to the area and soil type.
- Use the following seeding and planting BMPs, or equivalent BMPs, to obtain information on grass mixtures, temporary and permanent seeding procedures, maintenance of a recently planted area, and fertilizer application rates: [BMP C120: Temporary and Permanent Seeding](#), [BMP C121: Mulching](#), [BMP C123: Plastic Covering](#), and [BMP C124: Sodding](#).
- Adjusting the soil properties of the subject site can assist in selection of desired plant species. Consult a soil restoration specialist for site-specific conditions.

Recommended Additional BMPs:

- Conduct mulch-mowing whenever practicable.
- Use native plants in landscaping. Native plants do not require extensive fertilizer or pesticide applications. Native plants may also require less watering.
- Use mulch or other erosion control measures on soils exposed for more than one week during the dry season (May 1 to September 30) or two days during the rainy season (October 1 to April 30).
- Till a topsoil mix or composted organic material into the soil to create a well-mixed transition layer that encourages deeper root systems and drought-resistant plants.
- Apply an annual topdressing application of 3/8" compost. Amending existing landscapes and turf systems by increasing the percent organic matter and depth of topsoil can:
 - Substantially improve the permeability of the soil.
 - Increase the disease and drought resistance of the vegetation.
 - Reduces the demand for fertilizers and pesticides.
- Disinfect gardening tools after pruning diseased plants to prevent the spread of disease.
- Prune trees and shrubs in a manner appropriate for each species.
- If specific plants have a high mortality rate, assess the cause and replace with another more appropriate species.
- When working around and below mature trees, follow the most current American National Standards Institute (ANSI) ANSI A300 standards (see

http://www.tcia.org/TCIA/BUSINESS/ANSI_A300_Standards_/TCIA/BUSINESS/A300_Standards/A300_Standards.aspx?hkey=202ff566-4364-4686-b7c1-2a365af59669) and International Society of Arboriculture BMPs to the extent practicable (e.g., take care to minimize any damage to tree roots and avoid compaction of soil).

- Monitor tree support systems (stakes, guys, etc.).
 - Repair and adjust as needed to provide support and prevent tree damage.
 - Remove tree supports after one growing season or maximum of 1 year.
 - Backfill stake holes after removal.
- When continued, regular pruning (more than one time during the growing season) is required to maintain visual sight lines for safety or clearance along a walk or drive, consider relocating the plant to a more appropriate location.
- Make reasonable attempts to remove and dispose of class C noxious weeds.
- Re-seed bare turf areas until the vegetation fully covers the ground surface.
- Watch for and respond to new occurrences of especially aggressive weeds such as Himalayan blackberry, Japanese knotweed, morning glory, English ivy, and reed canary grass to avoid invasions.
- Plant and protect trees per [BMP T5.16: Tree Retention and Tree Planting](#).
- Aerate lawns regularly in areas of heavy use where the soil tends to become compacted. Conduct aeration while the grasses in the lawn are growing most vigorously. Remove layers of thatch greater than ¾-inch deep.
- Set the mowing height at the highest acceptable level and mow at times and intervals designed to minimize stress on the turf. Generally mowing only 1/3 of the grass blade height will prevent stressing the turf.
 - Mowing is a stress-creating activity for turfgrass.
 - Grass decreases its productivity when mowed too short and there is less growth of roots and rhizomes. The turf becomes less tolerant of environmental stresses, more disease prone and more reliant on outside means such as pesticides, fertilizers, and irrigation to remain healthy.

Additional BMP Information:

- King County's *Best Management Practices for Golf Course Development and Operation* ([King County, 1993](#)) has additional BMPs for Turfgrass Maintenance and Operation.
- King County, Seattle Public Utilities, and the Saving Water Partnership have created the following natural lawn and garden care resources that include guidance on building healthy soil with compost and mulch, selecting appropriate plants, watering, using alternatives to pesticides, and implementing natural lawn care techniques.

- *Natural Yard Care - Five steps to make your piece of the planet a healthier place to live* ([King County and SPU, 2008](#))
- *The Natural Lawn & Garden Series: Smart Watering* ([Saving Water Partnership, 2006](#))
- *Natural Lawn Care for Western Washington* ([Saving Water Partnership, 2007](#))
- *The Natural Lawn & Garden Series: Growing Healthy Soil; Choosing the Right Plants; and Natural Pest, Weed and Disease Control* ([Saving Water Partnership, 2012](#))
- The International Society of Arboriculture (ISA) is a group that promotes the professional practice of arboriculture and fosters a greater worldwide awareness of the benefits of trees through research, technology, and education. ISA standards used for managing trees, shrubs, and other woody plants are the American National Standards Institute (ANSI) A300 standards. The ANSI A300 standards are voluntary industry consensus standards developed by the Tree Care Industry Association (TCIA) and written by the Accredited Standards Committee (ASC). The ANSI standards can be found on the ISA website: www.isa-arbor.com/education/publications/index.aspx
- Washington State University's *Gardening in Washington State* website at <http://gardening.wsu.edu> contains Washington State specific information about vegetation management based on the type of landscape.
- See the *Pacific Northwest Plant Disease Management Handbook* ([Pscheidt and Ocamb, 2016](#)) for information on disease recognition and for additional resources.

S442 BMPs for Labeling Storm Drain Inlets On Your Property

Description of Pollutant Sources: Waste materials dumped into storm drain inlets can have severe impacts on receiving waters. Posting notices regarding discharge prohibitions at storm drain inlets can prevent waste dumping. Storm drain signs and stencils are highly visible source controls that are typically placed directly adjacent to storm drain inlets.

Pollutant Control Approach: The stencil, affixed sign, or metal grate contains a brief statement that prohibits dumping of improper materials into the urban runoff conveyance system. Storm drain messages have become a popular method of alerting the public about the effects of and the prohibitions against waste disposal.

Applicable Operational BMPs:

- Label storm drain inlets in residential, commercial, industrial areas, and any other areas where contributions or dumping to storm drains is likely.
- Stencil or apply storm drain markers adjacent to storm drain inlets to help prevent the improper disposal of pollutants. Or, use a storm drain grate stamped with warnings against polluting.
- Place the marker in clear sight facing toward anyone approaching the inlet from either side.
- Use a brief statement and / or graphical icons to discourage illegal dumping. Examples include:
 - “No Dumping – Drains to Stream”
 - “No Pollutants – Drains to Puget Sound”
 - “Dump No Waste – Drains to Lake”
 - “No Dumping – Puget Sound Starts Here”
- Check with your local government agency to find out if they have approved specific signage and / or storm drain message placards for use. Consult the local agency stormwater staff to determine specific requirements for placard types and methods of application.
- Maintain the legibility of markers and signs. Signage on top of curbs tends to weather and fade. Signage on face of curbs tends to be worn by contact with vehicle tires and sweeper brooms.
- When painting stencils or installing markers, temporarily block the storm drain inlet so that no pollutants are discharged from the labeling activities.

Optional Operational BMPs:

Use a stencil in addition to a storm drain marker or grate to increase visibility of the message.

Reference for this BMP: [\(CASQA, 2003\)](#)

Figure IV-7.6: Storm Drain Inlet Labels



Storm Drain Inlet Labels

Revised October 2017

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