


# City of SeaTac

## Policies and Procedures

<b>Policy Number:</b>	CW - 017
<b>Policy Name:</b>	National Pollutant Discharge Elimination System Permit Compliance - Roles & Responsibilities Policy
<b>Department(s):</b>	Community and Economic Development, Finance and Systems, Human Resources, Parks, Recreation and Facilities and Public Works
<b>Effective Date:</b>	08/12/15
<b>Supersedes:</b>	N/A
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<b>Approved by:</b>	Todd Cutts, City Manager
<b>Signature:</b>	

**Purpose:**

The Western Washington Phase II Municipal Stormwater Permit (NPDES permit) is a federal permit issued to the City, which allows municipal stormwater systems to discharge stormwater to surface waters of the state.

(<http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phaseIIww/wwphiipermmit.html>)

The NPDES permit contains conditions which are satisfied by several departments working together, including Community and Economic Development, Finance and Systems, Human Resources, Parks & Recreation and Public Works. It is a condition of the 2013 – 2018 NPDES permit (Section S5.A.5.b) that the City develop a coordination mechanism to assist with permit compliance.

The overarching purpose of the NPDES permit is to protect and improve our natural water ways – creating a healthy environment. This purpose aligns directly with the City goal to “Enhance our Community”. It is through interdepartmental cooperation that City staff can work hand in hand to enhance our natural resources and the livability of SeaTac and help create a safe, active and attractive City.

This policy clarifies roles and responsibilities to ensure City departments are working together both effectively and efficiently in support of NPDES compliance and City goals.

**Policies:**

- 1) The NPDES permit affects the activities for several City departments, and as such, the NPDES permit is viewed as a citywide permit.
- 2) It is essential that all departments work both individually and cooperatively to enhance our community, as well as protect and improve our natural water ways.
- 3) Lead Department: The Public Works Department is responsible for coordinating citywide compliance efforts, as well as assisting all affected City departments in meeting their roles and responsibilities both effectively and efficiently. To ensure these efficiencies, all departments will work cooperatively with the lead department, responding and providing accurate tracking and reporting information in a timely manner.
- 4) Public Works' Stormwater Compliance Manager is identified as the point person (NPDES Permit Coordinator) for NPDES coordination and support. The NPDES Permit Coordinator is responsible for educating, assisting, guiding and coordinating compliance efforts to allow departments to efficiently meet NPDES requirements and City goals. His or her duties also include:
  - a. Coordinate, sign and submit all NPDES permit related submittals to Washington State Department of Ecology (Ecology).
  - b. Coordinate NPDES compliance efforts for the City, including collecting tracking and reporting data from the different departments, as well as preparing and submitting annual reports and updates to the Stormwater Management Program Plan to the Department of Ecology.
  - c. Assist the different city departments in understanding their individual roles and responsibilities and assist in modifying their processes and procedures as necessary to meet the conditions of the NPDES permit (see Section 11).
  - d. Assist in the development or update of departmental programs or procedures necessary to meet NPDES requirements and City goals.
  - e. Assist in training efforts, where applicable.
  - f. Work with individual departments to assist in resolving issues of non-compliance, as well as drafting and submitting G3 or G20 non-compliance notification letters to Ecology.
  - g. Ensure that training on illicit discharge detection and reporting is provided for all municipal field staff.
- 5) All municipal field staff are responsible for reporting all suspected illicit discharges to the City's Spill Hotline 206-973-4770.
- 6) All affected city departments are responsible for working with the NPDES Permit Coordinator to resolve instances of permit noncompliance, including:
  - a. Notifying the NPDES Permit Coordinator as soon as they become aware of any instance of non-compliance with these policies and procedures; and
  - b. Identifying steps and a timeline for resolving issues of non-compliance that will be identified in G3 or G20 notifications to Ecology.

## 7) Compliance with Standards

### a. Building and Land Management Standards

The daily activities in all affected City departmental operations that can impact stormwater or water quality must be consistent with applicable adopted building and land management standards listed below. These building and land management activities include, but are not limited to: maintenance, cleaning, painting, and vegetation management, etc.

- i. King County's Stormwater Pollution Prevention Manual (SMC 12.10.010)
- ii. City of SeaTac Integrated Pest and Vegetation Management Plan (SMC 12.10.010)

### b. Stormwater Standards

All stormwater development review, inspection and maintenance activities must be consistent with the currently adopted stormwater standards:

- i. The King County Surface Water Design Manual (KCSWDM) as amended by the City of SeaTac Addendum to the KCSWDM (SMC 12.10.010), and supplemented by:
  - The ESA Regional Road Maintenance Guidelines;
  - Low Impact Development Technical Guidance Manual for the Puget Sound

8) All affected City departments are responsible for ensuring the annual maintenance of all City-owned or operated stormwater facilities located on properties under each departments' purview consistent with Section S5.C5 of the NPDES Permit.

9) All affected City departments are responsible for training staff, keeping records and providing accurate tracking and reporting data to the NPDES Permit Coordinator for the NPDES programs under their purview (see Section 11)

## 10) Departmental Responsibilities

It is the responsibility of each department director to assign the duties and responsibilities identified in this policy to the appropriate members of their staff, as well as ensure they are being implemented correctly. This clarification of roles and responsibilities is intended to improve both efficiency and effectiveness in meeting these obligations, and provide more direct channels of communication between departments. Assistance in identifying and understanding these responsibilities is available from the NPDES Coordinator.

### a. Public Works

- i. The Public Works (PW) Department is responsible for meeting the majority of the conditions of the NPDES permit including Sections: S5.C.1 Public Education and Outreach, S5.C.2 Public Involvement, S5.C.3 Illicit Discharge Detection and Elimination, S5.C.5 Operations and Maintenance, and portions of Section S5.C.4

related to Capital Improvement Project (CIP) design review, construction and inspections, post construction stormwater system inspection and maintenance.

ii. PW CIP Projects

1. Public Works is responsible for NPDES compliance on all Public Works CIP projects. These responsibilities include:
  - a) Conducting stormwater development review and inspections consistent with adopted standards and policies.
  - b) Design review and inspection tracking and reporting.
  - c) Tracking, reporting and justifying any deviations (e.g. variances, exceptions) from adopted stormwater development review standards.
  - d) Collection of final as-built stormwater system drawings for new and redevelopments (preferably as geo-referenced ESRI-compatible files, such as: DWG, DXF, ESRI shape, ESRI geodatabase, or DGN file formats) and distribution of these as-builts to designated GIS and Public Works staff. Scanning and tracking physical and digital copies of drawings.<sup>1</sup>
  - e) Updating all affected city codes, policies, plans and standards, implemented by or under the purview of PW necessary to meet the terms of the NPDES Permit.

iii. Public Works is also specifically responsible for:

1. NPDES Permit coordination
2. Annual Reporting
3. Development and submittal of the Stormwater Management Program Plan
4. Serving as point of contact for the Department of Ecology regarding issues of the Permit
5. Coordinating and submitting G3 and G20 noncompliance notifications

b. Community and Economic Development

The Community and Economic Development (CED) Department is generally responsible for implementing Section S5.C4 of the NPDES Permit entitled “Controlling Runoff from New Development, Redevelopment and Construction Sites”. These responsibilities include, but are not limited to:

- i. Conducting development review consistent with adopted standards and policies.
- ii. Tracking and reporting development review activities and permits.
- iii. Tracking, reporting and justifying any deviations (e.g. variances, exceptions) from adopted stormwater development review standards.
- iv. Collection of final as-built stormwater system drawings for new and applicable redevelopments (preferably as geo-referenced ESRI-compatible files, such as: DWG,

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<sup>1</sup> Procedures for collecting, tracking, recording, mapping and distributing as-builts drawings are currently under review and will be addressed in a separate document (i.e. policy or process improvement).

- DXF, ESRI shape, ESRI geodatabase, or DGN file formats) and distribution of these as-builts to designated GIS Group and Public Works staff. Scanning and tracking physical and digital copies of drawings.<sup>2</sup>
- v. Managing, and tracking stormwater maintenance bonds for facilities associated with a specific development review activity or permit.
  - vi. Updating all affected city codes, policies, plans and standards, implemented by or under the purview of CED necessary to meet the terms of the NPDES Permit.
    - 1. Exceptions – Revision to SMC 12.10 – Surface and Stormwater Management Code, as well as the adoption of surface water design manual and its addendum, is the responsibility of the Public Works Department. However, as stakeholders of the manual and its addendum, CED will assist in the development and update of these documents.
- c. Finance and Systems – Geographic Information Systems (GIS)
- The GIS Group is responsible for maintaining and updating the City’s storm system mapping as identified in Section S5.C.3.a of the Permit. GIS’s maintenance and updating of stormwater mapping is based on information collected in the field or provided in drawings by Public Works or Community and Economic Development departments. [Note: The GIS Group creates protocols for field data collection, but is not responsible for field work, beyond prototyping.]
- d. Parks, Recreation and Facilities
- i. The Parks and Recreation Department (Parks) is responsible for performing work consistent with adopted building and land management standards (See section 7 of this policy) in all operations and maintenance activities on City owned or operated properties under their purview.
  - ii. Parks is also responsible for ensuring the annual maintenance of all stormwater facilities located on properties under their purview consistent with the terms of Section S5.C5 of the NPDES permit.
- e. Human Resources
- The Human Resource Department will assist the PW Department in its IDDE training efforts by generating and providing a list of all municipal field staff within two weeks of a request from the PW Department.
- f. NPDES Departmental Level Policies
- i. Given the scope of NPDES responsibilities assigned to the Public Works and CED Departments, said departments will create individual department policies assigning roles and responsibility among their department and division management and staff. Said departmental policies will be completed within 6 months of the date of this citywide policy.
  - ii. The NPDES Permit Coordinator will assist these departments in creating these departmental level policies.

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<sup>2</sup> Procedures for collecting, tracking, recording, mapping and distributing as-builts drawings are currently under review and will be addressed in a separate document (i.e. policy or process improvement).

**Procedures:**

- 1) The NPDES Permit Coordinator will notify all affected departments of their individual NPDES reporting requirements on or before January 15<sup>th</sup> of each year.
- 2) All affected departments will report NPDES annual tracking information to the NPDES Permit Coordinator on or before February 15<sup>th</sup> of each year.
- 3) If departments are unable to meet the above timeline, they must promptly notify the NPDES Permit Coordinator in order to jointly establish a definitive completion date.