

Eastern Washington Phase II Municipal Stormwater Permit

National Pollutant Discharge Elimination System and
State Waste Discharge General Permit for Discharges
From Small Municipal Separate Storm Sewers in Eastern Washington (MS4)

Permit No. WAR04-6204

Stormwater Management Program
(SWMP)

03-31-08
Program Year 1
Attachment 4

Sunnyside Valley Irrigation District
120 South 11th Street
PO Box 229
Sunnyside, WA 98944-1579

Sunnyside Valley Irrigation District Stormwater Management Program

Overview

The Sunnyside Irrigation District (SVID) is a secondary permittee within the Eastern Washington Phase II Municipal Stormwater Permit Program. The city limits of Sunnyside are the boundaries for which drains and or wasteways are included within the Stormwater Management Program (SWMP). The SWMP is designed to reduce the discharge of pollutants from regulated small MS4s to the maximum extent practicable and protect water quality.

The SVID operations office, maintenance shop, and storage yards are included in the SWMP. SVID drains and wasteways were constructed before and during the growth of the City of Sunnyside. Stormwater from the City of Sunnyside is conveyed into SVID drains and wasteways (see map 1.). All drains convey irrigation water and possible stormwater to the Sulphur Creek Wasteway. The Sulphur Creek Wasteway conveys its water to the Yakima River.

SVID is starting the discussion process of a memorandum of understanding (MOU) with the City of Sunnyside (COS) to coordinate pollution reduction efforts.

SVID History

SVID is the largest entity in the Sunnyside Division which encompasses all lands served by the Sunnyside Canal. The Sunnyside Division serves 99,244 irrigable acres and is comprised of three irrigation districts: Sunnyside Valley Irrigation District, Grandview Irrigation District and Benton Irrigation District, two ditch companies Konowac Ditch Company and Piety Flat Ditch Company, and five cities and towns Zillah, Granger, Sunnyside, Grandview and Prosser. SVID provides irrigation service to roughly 86,500 acres with mostly senior, non-proratable rights. The Sunnyside Division has, in the aggregate, 2/3 senior or non-proratable rights and 1/3 junior or proratable rights.

The Sunnyside Division dates back to 1890 when the Northern Pacific Railroad began construction of the Sunnyside Canal. The United States Bureau of Reclamation (then known as the United States Reclamation Service) purchased the Sunnyside Canal in 1905 and by 1923 completed the project.

On March 10, 1906, the Sunnyside Water Users Association was formed to provide a liaison between the federal government and the landowners. On January 22, 1917, the Sunnyside Valley Irrigation District was formed to replace the Sunnyside Water Users Association.

The Bureau of Reclamation operated the Sunnyside Division until 1945. Beginning with the 1946 irrigation season, SVID has operated and maintained its facilities as well as the joint use facilities of the Sunnyside Division.

SVID is a governmental entity and is not privately owned or operated for profit. Under contract with the United States, SVID operates and maintains federal facilities that are the Sunnyside Division of Yakima Reclamation Project.

2. SWMP Components: Program Elements and Performance Measures

Section two describes the six Stormwater Management Program elements contained in the secondary permit: 1) Public Education and Outreach, 2) Public Involvement and participation, 3) Illicit Discharge and Elimination, 4) Construction Site Stormwater Runoff Control, 5) Post-Construction Stormwater Management for New Development and Redevelopment, and 6) Pollution Prevention and Good Housekeeping for Municipal Operations.

The program elements are organized consistent with the permit structures in section S6.

Figure 2. Performance Measure Template

PERFORMANCE MEASURE

Permit section, name of Performance Measure, Implementation deadline

GOAL

An anticipated outcome that guides the use of the performance measure.

EXISTING ACTIVITIES

This section describes existing activities associated with the performance measure. SVID may not be responsible for all activities (e.g. volunteer groups and countywide programs), but they affect the local community and represent stormwater management activities already underway by SVID.

MEASUREABLE ACTIVITIES

This section lists the quantifiable activities that describe how the performance measure will be accomplished.

ASSESSMENT

This section identifies documentation needed to assess performance measures as required by the permit.

2.1. Public Education and Outreach Program Element

The Public Education and Outreach Program Element focuses primarily on educating the SVID employees. The City of Sunnyside will take the lead on public education of landowners within the city limits of Sunnyside concerning the potential impact of stormwater discharges on receiving waters. The receiving waters are defined as SVID drains. These drains discharge into the Sulphur Creek Wasteway and then into the Yakima River at Mile 61.0. Increased employee and irrigator knowledge about how their actions and choices affect stormwater and ultimately the Yakima River. Public education for both SVID employees and landowners should result in increased public acceptance and support of the stormwater program.

2.1.1. *Permit Requirements for Education and Outreach*

Section S6.D.1 of the Eastern Washington Phase II NPDES Stormwater permit requires the permittee to implement the following stormwater education strategies:

- a. SVID storm drain inlets at the office facility, maintenance yards, parking lot, along sidewalks, and at pedestrian access points shall be clearly and permanently labeled with the message "Dump no waste" and indicating the point of discharge as the Yakima River.
 - i. SVID has identified the storm drain inlets at the office facility which includes the parking lots, maintenance shop, and maintenance yards at 120 South 11th Street, Sunnyside, Washington, 98944.
 - ii. No later than three years from the date of permit coverage, at least 50 percent of these inlets shall be labeled.
 - iii. As identified during visual inspection and regular maintenance of storm drain inlets, any inlet having a label that is no longer clearly visible and/or easily readable shall be re-labeled within 90 days.

- b. SVID will be supportive of the COS's public education. It will continue to distribute educational articles in the RSBOJC Update, a publication of the Roza-Sunnyside Board of Joint Control, on the impact of stormwater discharges on receiving waters, and the steps that may be taken to reduce pollutants in stormwater runoff. This publication is sent to all landowners in the Sunnyside Valley Irrigation District, which includes most households in the City of Sunnyside. All landowners shall receive educational information about the following topics:
 - i. How stormwater runoff affects local waterbodies;

- ii. Proper use and application of pesticides and fertilizers;
- iii. Benefits of using well-adapted vegetation;
- iv. Alternative equipment washing practices including cars and trucks that minimize pollutants in stormwater;
- v. Benefits of proper vehicle maintenance and alternative transportation choices; proper handling and disposal of wastes, including the location of hazardous waste collection facilities in the area;
- vi. Hazards associated with illicit connections; and
- vii. Benefits of litter control and proper disposal of pet waste.

Compliance with this requirement can be achieved through participation in the City of Sunnyside's Public Education and Outreach Program.

2.1.2. Supporting Program Elements

The public involvement and participation program element works with the Public Education and Outreach Program Element by encouraging citizens to be informed and involved in the stormwater program.

2.1.3. Performance Measures

- SVID will document comments addressed to the stormwater articles in the RSBOJC Update
- SVID will document the number of calls reporting dumping; an increase will be considered as an informed citizenry.

2. 2. Public Involvement and Participation Program Element

The Public Involvement and Participation element involves SVID publishing a public notice in the local paper to solicit public review of the SWMP.

PERFORMANCE MEASURE

S6.D.1.a. Identify storm drain inlets operated by SVID by 02/2010

GOAL

Identify all inlet drains operated by SVID in the office and shop facility.

EXISTING ACTIVITIES

All inlet drains operated by SVID in the office and shop facility have been identified.

MEASURABLE ACTIVITIES

A map showing the location of the inlet drains will be made and available to the public and the City of Sunnyside.

ASSESSMENT

1. Develop a GIS map showing the location of the Office Facility and the inlet drains.

PERFORMANCE MEASURE

S6.D.1.b. Distribute educational information to landowners by SVID by 02/2010

GOAL

Distribute educational materials on stormwater pollution prevention to employees and those landowners who reside within the City of Sunnyside.

EXISTING ACTIVITIES

The RSBOJC Update, a publication for landowners of the Sunnyside Valley Irrigation District, has had articles on the MS4 process. This publication will be used to present stormwater pollution prevention Best Management Practices (BMP) to landowners who reside within the city limits of Sunnyside.

The Canal Zone News, a SVID employee oriented publication, currently has educational and safety articles. SVID will run BMP articles for preventing stormwater pollution while performing job tasks.

MEASURABLE ACTIVITIES

1. SVID will publish articles in the RSBOJC update and Canal Zone News on the following subjects:

All landowners and employees shall receive educational information about the following topics:

- i. How stormwater runoff affects local waterbodies;
- ii. Proper use and application of pesticides and fertilizers;
- iii. Benefits of using well-adapted vegetation;
- iv. Alternative equipment washing practices including cars and trucks that minimize pollutants in stormwater;
- v. Benefits of proper vehicle maintenance and alternative transportation choices; proper handling and disposal of wastes, including the location of hazardous waste collection facilities in the area;
- vi. Hazards associated with illicit connections; and
- vii. Benefits of litter control and proper disposal of pet waste.

ASSESSMENT

- Maintain a file of all published articles for the RSBOJC Update and the Canal Zone News publications.
- Track the distribution of outreach material including audience, quantity, and date.
- Document any comments or suggestions made by the community regarding outreach materials.

PERFORMANCE MEASURE

S6.D.2.a. Publish a public notice of SWMP by July of 2011

GOAL

Publish the SWMP in The Sun Daily News, the City of Sunnyside local newspaper, to solicit public comment on the SVID SWMP.

EXISTING ACTIVITIES

None to date.

MEASURABLE ACTIVITIES

Develop the SWMP for public review. The SWMP is living document and will be enhanced through the program years.

ASSESSMENT

1. Publish the SWMP in the Sun Daily News.
2. Publish the SWMP on the SVID website for comment and review.
3. Document any comments or suggestions made by the community regarding outreach materials.

PERFORMANCE MEASURE

S6.D.2.b. Make the latest update of the SWMP available to the public, 07/2011

GOAL

Publish the latest edition of the SWMP on the SVID website to solicit public comment.

EXISTING ACTIVITIES

SVID has a website.

MEASURABLE ACTIVITIES

Develop the SMPW for public review on the website.

- Place the latest version on the website and track public comment of the SWMP.
- Place stormwater links on the website; link to the City of Sunnyside's website.
- Provide information on BMPs
- Encourage the public to contact SVID if they see any illegal dumping or know of illicit connections to the drains, joint drains, or wasteways.

ASSESSMENT

1. Maintain a monthly report of website traffic.
2. Keep a log of website changes with new SWMP versions.
3. Document any comments or suggestions made by the community regarding the content of the website.

2.3. Illicit Discharge Detection and Elimination (IDDE) Program Element

The Eastern Washington Phase II NPDES Stormwater Permit requires each Secondary Permittee to comply with all relevant ordinances, rules, and regulations of the local jurisdiction(s) in which the Secondary Permittee is located that govern non-stormwater discharges.

SVID shall cooperate with the City of Sunnyside to detect and eliminate illicit discharges to SVID drains which discharge to the Sulphur Creek Wasteway. The Sulphur Creek Wasteway discharges to the Yakima River. SVID will comply with all relevant ordinances, rules, and regulations of the City of Sunnyside as listed in the Regional Stormwater Management Program for Yakima County and the Cities of Yakima, Union Gap, and Sunnyside. This document resides on the Yakima County website at: <http://www.co.yakima.wa.us/Stormwater/Documents/RSWaMP.pdf>

An illicit connection is a physical connection to the SVID drain or joint drain that has not been approved by SVID and is not carrying irrigation return flow. Illegal dumping is the intentional or inadvertent dumping of prohibited materials into the drain and or wasteways.

2.3.1 Permit Requirements for Illicit Discharges

- a. The Eastern Washington Phase II NPDES Stormwater Permit requires SVID to comply with all relevant ordinances, rules, and regulations of the City of Sunnyside which governs non-stormwater discharges.
- b. SVID will develop and adopt appropriate policies prohibiting illicit discharges and illegal dumping no later than one year from the date of permit coverage. Identify possible enforcement mechanisms no later than one year from the date of permit coverage; and, no later than eighteen months from the date of permit coverage, develop and implement an enforcement plan using these mechanisms to ensure compliance with illicit discharge policies. These policies shall address, at a minimum:
 - illicit connections;
 - non-stormwater discharges as defined below;
 - and spilling, dumping, or otherwise improperly disposing of:
 - Hazardous materials, pet waste, and litter.
- i. Non-stormwater discharges covered by another NPDES permit and discharges from emergency fire fighting activities are allowed in the MS4 in accordance with *S2. Authorized Discharges*.
- ii. The policies do not need to prohibit the following categories of non-stormwater

discharges:

- Diverted stream flows;
- Rising ground waters;
- Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20));
- Uncontaminated pumped ground water;
- Foundation drains;
- Air conditioning condensation;
- Irrigation water from agricultural sources that is commingled with urban Stormwater;
- Springs;
- Water from crawl space pumps;
- Footing drains; and
- Flows from riparian habitats and wetlands.

iii. The policies shall prohibit the following categories of non-stormwater discharges unless the stated conditions are met:

Discharge	Permit Condition
Potable water sources including water line flushing, hyper chlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water.	Planned discharges shall be de-chlorinated to a concentration of 0.1 ppm or less, pH-adjusted if necessary, and volumetrically and velocity controlled to prevent resuspension of sediments
Discharges from lawn watering and other irrigation runoff.	These discharges shall be minimized at the SVID facilities site through water conservation efforts. SVID will assist the City of Sunnyside in education with the RSBOJC Update publication.
Dechlorinated swimming pool discharges.	SVID has no swimming pools.
Street and sidewalk wash water, water used to control dust, and routine external building wash down that does not use detergents.	SVID shall reduce these discharges through education and/or water conservation efforts. To avoid washing pollutants into the MS4, SVID shall minimize the amount of street wash and dust control water used. At active construction sites, street sweeping shall be performed prior to washing the street.
Other non-stormwater discharges	Shall be in compliance with the requirements of a stormwater pollution prevention plan reviewed by the Permittee

- c. SVID will by 12/15/2011 develop a storm sewer system map showing the locations of all known storm drain outfalls, labeling the receiving waters, and delineating the areas contributing runoff to each outfall. Make the map (or completed portions of the map) available on request to Ecology and/or to other Permittees or Secondary Permittees. The preferred, but not required, format of submission will be an electronic format with fully described mapping standards. An example description is provided on Ecology's website.
- d. Conduct field inspections and visually inspect for illicit discharges at all known outfalls that discharge to surface waters. Visually inspect at least one third (on average) of all known outfalls each year beginning no later than two years from the date of permit coverage. Develop and implement procedures to identify and remove any illicit discharges. Keep records of inspections and follow-up activities.

PERFORMANCE MEASURE

S6.D.3.a. Comply with ordinances, rules and regulation of COS, 02/16/2007

GOAL

Comply with all ordinances, rules, and regulations of the City of Sunnyside relevant to non-stormwater discharges.

EXISTING ACTIVITIES

SVID has met with the City of Sunnyside Director of Public Works. SVID has held discussions with staff engineers concerning stormwater issues.

The SVID Board developed a policy prohibiting illicit discharges and illegal dumping. This policy was passed as Resolution 2008-02-01 "Prevention of Illicit Discharges". The first resolution of five speaks to this compliance:

1. Non-stormwater discharges from SVID owned / operated property within the boundaries of the City of Sunnyside shall comply with all relevant ordinances, rules, and regulations of the City of Sunnyside.
2. SVID will administer the outfalls into SVID's drainage system and will delegate any regulatory responsibility to the City of Sunnyside for enforcement of both stormwater and illicit discharges that enter SVID's drainage system directly or via the City of Sunnyside's stormwater collection system.
3. SVID shall in cooperation with the City of Sunnyside maintain and update a storm sewer system map showing the locations of all known storm drain outfalls, labeling the receiving waters, and delineating the areas contributing runoff to each outfall. The map shall be available on request to Ecology and the City of Sunnyside.
4. SVID shall conduct field inspections and visually inspect for illicit discharges at all known outfalls that discharge to its drainage system. SVID will visually inspect at least one third (on average) of all known outfalls each year.
5. SVID shall identify and take appropriate actions in conjunction with the City of Sunnyside to remove any illicit discharges and keep records of inspections and follow-up activities.

MEASURABLE ACTIVITIES

Know all relevant ordinances, rules, and regulations concerning stormwater.

1. Track all stormwater meetings with the City of Sunnyside.
2. Track all changes to current protocol as a result of meetings with the City of Sunnyside.

ASSESSMENT

1. Keep a log of all meetings and letters between the City of Sunnyside and SVID.
2. Document any comments or suggestions made by the City of Sunnyside regarding out the content of the website.

PERFORMANCE MEASURE

S6.D.3.b. Develop appropriate policies prohibiting illicit discharges, 02/16/2008

GOAL

Develop and adopt polices prohibiting illicit discharges and illegal dumping.

EXISTING ACTIVITIES

The SVID Board developed a policy prohibiting illicit discharges and illegal dumping. This policy was passed as Resolution 2008-02-01 “Prevention of Illicit Discharges”.

1. Non-stormwater discharges from SVID owned / operated property within the boundaries of the City of Sunnyside shall comply with all relevant ordinances, rules, and regulations of the City of Sunnyside.

2. SVID will administer the outfalls into SVID’s drainage system and will delegate any regulatory responsibility to the City of Sunnyside for enforcement of both stormwater and illicit discharges that enter SVID’s drainage system directly or via the City of Sunnyside’s stormwater collection system.

3. SVID shall in cooperation with the City of Sunnyside maintain and update a storm sewer system map showing the locations of all known storm drain outfalls, labeling the receiving waters, and delineating the areas contributing runoff to each outfall. The map shall be available on request to Ecology and the City of Sunnyside.

4. SVID shall conduct field inspections and visually inspect for illicit discharges at all known outfalls that discharge to its drainage system. SVID will visually inspect at least one third (on average) of all known outfalls each year.

5. SVID shall identify and take appropriate actions in conjunction with the City of Sunnyside to remove any illicit discharges and keep records of inspections and follow-up activities.

MEASURABLE ACTIVITIES

1. SVID will document the activities of the Prevention of Illicit Discharges policy
2. Track all stormwater meetings with the City of Sunnyside.

ASSESSMENT

1. Adjust current policy or adopt an additional policy(ies) if new information becomes available and requires a SVID Board resolution.

PERFORMANCE MEASURE

S6.D.3.c. Develop an electronic storm sewer system map , 12/2011

GOAL

An electronic map of the office facilities and the drains, joint drains, and wasteways within the City of Sunnyside is required to effectively identify where the City of Sunnyside stormwater drains empty into the SVID irrigation return flow drains.

SVID will develop an electronic, GIS, map of all SVID drains, joint drains, and wasteways within in the Sunnyside city limits. SVID will provide an electronic format with fully described mapping standards. SVID will label all known storm drain outfalls, and label the Sulphur Creek Wasteway and the Yakima River as the receiving waters. A separate map of the office facility and its drain system will be made. The following layers and themes will be used:

- Drain locations
- Manhole locations
- Roads
- Office facility location; a separate map file may be constructed due to scale.
- Boundary of City of Sunnyside limits

This mapping project will be coordinated with the City of Sunnyside and will incorporate the City's storm drain location outfalls to the SVID drains.

SVID will make the map (or completed portions of the map) available on request to Ecology and/or to other Permittees.

EXISTING ACTIVITIES

1. The drain, joint drains, and wasteway positions are being surveyed by SVID.
2. SVID does have GIS capability and the parcels are updated each month by the Yakima County GIS personnel.
3. Aerial Photography is available for the mapping layer, as well as roads, irrigation and cultural features.

MEASURABLE ACTIVITIES

1. Trimble Survey of manholes, drains, joint drains, and wasteways.
2. Construction of GIS layers for an electronic map.

3. Coordinate the SVID survey and mapping with the City of Sunnyside mapping of storm drain inlets.

ASSESSMENT

1. GIS layers of new information or corrected information
2. City of Sunnyside review and accuracy assessment of the drains, manholes, and stormwater inlet.

PERFORMANCE MEASURE

S6.D.3.d. Conduct field inspections for illicit discharges, one third done by 02/2009

GOAL

Conduct field inspections and visually inspect for illicit discharges at all known outfalls that discharge to surface waters. Visually inspect at least one third (on average) of all known outfalls each year beginning no later than February, 2009.

Develop and implement procedures to identify and remove any illicit discharges. Keep records of inspections and follow-up activities.

EXISTING ACTIVITIES

1. Forms entitled 'Suspected fecal coliform in irrigation drains' are in use by employees as part of the field inspection of drains.
2. Landowner concern forms are in use and will be adjusted to include illicit discharges, dumping, and stormwater concerns called into SVID.
3. SVID routinely checks all drains, joint drains, and wasteways for illicit discharges and dumping. Drains are field checked after major storms for competency.
4. SVID has procedures in place to remove illicit discharges such as:
 1. pipes tapped into drains, joint drains, and wasteways,
 2. illegal dumping
 3. organic debris, abandoned vehicles and appliances

MEASURABLE ACTIVITIES

1. Training will be provided to SVID staff members who take citizen and landowner calls and the form will be updated to reflect illicit discharge, dumping, and stormwater flooding.
2. SVID will document the calls, investigation response, laboratory values, and quantity and type of material dumped or discharged into irrigation return flow drains.
3. SVID will keep records of drain inspections and follow-up activities.
4. SVID will coordinate with the City of Sunnyside in conducting field inspections and exchange information.

ASSESSMENT

1. Forms will be in place for all field inspections, citizen complaints, and illicit discharge removal.
2. All inspections and procedures forms will be on file in the District office.

PERFORMANCE MEASURE

S6.D.3.e. Develop a spill response plan by 12/2011

GOAL

Develop and implement a spill response plan that includes coordination with a qualified spill responder.

EXISTING ACTIVITIES

1. SVID has an acrolein spill plan in place for the Office Facility; this includes an emergency response checklist for acrolein spills.
2. Three SVID employees are trained in the 40 hour HAZWOPER, Level B responder class.
3. Most SVID field employees and all supervisors have a public operator's spray license with Laws and Safety endorsement and are qualified to respond to herbicide and stormwater spills.
4. SVID has consulted with the City of Sunnyside Fire Department and has provided a map of the Office Facility. The Fire Department has the locations and types of hazardous materials for the Office Facility site.

MEASURABLE ACTIVITIES

1. SVID will have an MOU in place to coordinate with the City of Sunnyside concerning spill removal.
2. SVID will have a qualified spill responder as a backup to staff.

ASSESSMENT

1. SVID will have a spill plan in place before or on the 2011 deadline.

PERFORMANCE MEASURE

S6.D.3.f. Provide staff training to prevent spills and discharges

GOAL

Train all relevant staff in BMPs for preventing spills and illicit discharges. This training will be incorporated into the routine safety meetings held during the year.

EXISTING ACTIVITIES

1. SVID has a Safety and Training Coordinator on staff. The Coordinator addresses spill response at safety meetings along with other pertinent safety information. The Coordinator holds or supplies information for staff training meetings during the year. Signed safety sheets along with the prepared information are filed for documentation. These training sessions include:
2. Annual All staff safety meeting, held each December
3. Annual Ditchriders meeting
4. Annual Public Operator Spray License meeting
5. Annual Acrolein crew safety meeting
6. Monthly safety meeting which has both union and management representation and an elected individual from each division
7. Weekly staff safety meetings are held by each supervisor with their crew; Coordinator supplies information for the meeting

MEASURABLE ACTIVITIES

1. Show the video program “After the Rain: Urban Runoff (VTP 029), 1999, OSU Extension and Experiment Station Communications. A comprehensive exam will follow the video.
2. Document all safety meetings.
3. Include more stormwater BMPs for the employees within the safety meetings

ASSESSMENT

1. Document each training event with signature sheets for attendance.
2. Maintain safety meetings for each group of employees

2.4 Construction Site Stormwater Runoff Control

Stormwater draining from construction sites can be a significant source of sediment and attached pollutants. Excessive sediment loading can result in impacts to water quality and not be in compliance with the State of Washington Water Quality Standards.

2.4.1 Permit Requirements for Construction Site Stormwater Runoff Control

The Eastern Washington Phase II NPDES Stormwater Permit requires each Secondary Permittee to comply with all relevant ordinances, rules, and regulations of the local jurisdiction(s) in which the Secondary Permittee is located that govern non-stormwater discharges. SVID must:

1. For all construction projects under SVID control which require a construction stormwater permit, SVID shall obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction Activities, or an alternative individual NPDES permit prior to discharging construction related stormwater.
2. Coordinate with the City of Sunnyside regarding projects owned and operated by other entities which discharge into the SVID drains, joint drains, and wasteways.
3. Provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control *BMPs* and requirements, or hire trained contractors to perform the work.
4. Coordinate as requested with Ecology or the local jurisdiction to provide access for inspection of construction sites or other land disturbances.

PERFORMANCE MEASURE

S6.D.4.a. Comply with all ordinances, rules, and regulations from permit coverage

GOAL

Comply with all ordinances, rules, and regulations of the City of Sunnyside that govern construction phase stormwater pollution prevention measures. This will be done from the time of permit coverage.

EXISTING ACTIVITIES

Construction Stormwater Permits are required by State regulation, but not local ordinance, for construction sites impacting one acre or more.

MEASURABLE ACTIVITIES

1. SVID will meet with the City of Sunnyside to review rules and coordinate actions.

ASSESSMENT

1. Document each meeting event or letters with the City of Sunnyside
2. Maintain a list of any adopted construction stormwater ordinances put forth by the City of Sunnyside.

PERFORMANCE MEASURE

S6.D.4.b. Obtain coverage under NPDES General Permit if required

GOAL

For all construction projects under the control of the Secondary Permittee which, require a construction stormwater permit, SVID will obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction Activities, or an alternative individual NPDES permit prior to discharging construction related stormwater.

EXISTING ACTIVITIES

1. All SVID construction within the City limits of Sunnyside currently requires all staff and outside entities to comply with all relevant local, state, and federal requirements.
2. SVID uses state and federal standards prescribed in *Stormwater Management Manual for Eastern Washington, 09/2004, Publication number 04-10-076*.
3. All projects are tracked and documented on the Engineering Master Work Schedule. This schedule has a check point for all relevant permits.

MEASURABLE ACTIVITIES

1. SVID Engineering Department will review all projects to determine those that need apply for the NPDES permit.

ASSESSMENT

1. Document each project reviewed.

PERFORMANCE MEASURE

S6.D.4.c. Coordinate with the City of Sunnyside to achieve compliance

GOAL

SVID will coordinate with the City of Sunnyside regarding projects owned and operated by other entities which discharge into SVID's drains, joint drains, and wasteways, to assist the local jurisdiction with achieving compliance with all relevant ordinances, rules, and regulations of the City of Sunnyside.

EXISTING ACTIVITIES

1. All SVID construction within the city limits of the City of Sunnyside currently require all staff and outside entities to comply with all relevant local, state, and federal requirements.
2. SVID uses state and federal standards prescribed in *Stormwater Management Manual for Eastern Washington, 09/2004, Publication number 04-10-076*.

MEASURABLE ACTIVITIES

1. SVID will document all meetings and letters with the City of Sunnyside concerning construction.

ASSESSMENT

1. Document each project reviewed.

PERFORMANCE MEASURE

S6.D.4.d. Provide training to relevant staff in erosion and sediment control

GOAL

SVID will provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control *BMPs* and requirements, or hire trained contractors to perform the work.

EXISTING ACTIVITIES

All SVID construction within the City limits of Sunnyside currently require all staff and outside entities to comply with all relevant local, state, and federal requirements. SVID uses state and federal standards prescribed in *Stormwater Management Manual for Eastern Washington, 09/2004, Publication number 04-10-076*.

SVID has a Safety and Training Coordinator on staff. The Coordinator addresses erosion and sediment control at safety meetings along with other pertinent safety information. The Coordinator conducts meetings or supplies information for staff training meetings during the year. Signed safety sheets along with the prepared safety information are filed for documentation. These training sessions include:

1. Annual All staff safety meeting, held each December
2. Annual Ditchriders meeting
3. Annual Public Operator Spray License meeting
4. Annual Acrolein crew safety meeting
5. Monthly safety meeting which has both union and management representation and an elected individual from each division
6. Weekly staff safety meetings are held by each supervisor with their crew; Coordinator supplies information for the meeting

MEASURABLE ACTIVITIES

1. Show the video program "After the Rain: Urban Runoff (VTP 029), 1999, OSU Extension and Experiment Station Communications. A comprehensive exam will follow the video.
2. Conduct specific erosion and sediment control for CDL operators and supervisors.
3. Document all safety meetings.

4. Include more erosion and sediment control information and training for employees within the safety meetings

ASSESSMENT

1. Document each training class.
2. All CDL license holders are trained in appropriate erosion and sediment control techniques.

2.5. Post-Construction Stormwater Management for New Development and Redevelopment

Impacts to water quality caused by development can be minimized through implementing post-construction stormwater quality performance measures. SVID will comply with the standards set by the City of Sunnyside.

Permit Requirements for Post-construction Stormwater Management

The Eastern Washington Phase II NPDES Stormwater Permit requires each Secondary Permittee to comply with all relevant ordinances, rules, and regulations of the local jurisdiction(s) in which the Secondary Permittee is located that govern post-construction stormwater pollution prevention measures.

Coordinate with the local jurisdiction regarding projects owned and operated by other entities which discharge into SVID's drains, joint drains, and wasteways, to assist the local jurisdiction with achieving compliance with all relevant ordinances, rules, and regulations of the City of Sunnyside.

PERFORMANCE MEASURE

S6.D.5.a. Comply with all relevant ordinances, rules, and regulations

GOAL

SVID will comply with all relevant ordinances, rules, and regulations of the City of Sunnyside in which SVID is located that govern post-construction stormwater pollution prevention measures.

EXISTING ACTIVITIES

All SVID construction within the limits of the City of Sunnyside currently require all staff and outside entities to comply with all relevant local, state, and federal requirements. SVID uses state and federal standards prescribed in *Stormwater Management Manual for Eastern Washington, 09/2004, Publication number 04-10-076* and refer to *Regional Stormwater Management Program for Yakima County and the Cities of Yakima, Union Gap, and Sunnyside*.

MEASURABLE ACTIVITIES

1. SVID will document all meetings and letters with the City of Sunnyside concerning post construction.

ASSESSMENT

1. Document each project reviewed.

2.6 Pollution Prevention and Good Housekeeping for Municipal Operations Program Element

2.6.1 Permit requirements for Pollution Prevention and Good Housekeeping

a. Secondary Permittees must develop and implement a municipal operation and maintenance (O&M) plan to minimize stormwater pollution from activities conducted by SVID. The O&M Plan shall include appropriate pollution prevention and good housekeeping procedures for all of the following operations, activities, and/or types of facilities that are present within the SVID office facility boundaries.

1. SVID will also coordinate with the City of Sunnyside to prevent and reduce pollutants from entering SVID drains, joint drains, and wasteways. SVID will consider the following activities and identify those that may contribute to stormwater pollution. The following facilities will be considered:
 - i. Stormwater collection and conveyance systems
 - ii. Roads, highways, and parking lots
 - iii. Vehicle fleets
 - iv. External building maintenance
 - v. Parks and open space
 - vi. Material storage areas
 - vii. Other facilities that would reasonably be expected to discharge contaminated runoff.
- b. The Secondary Permittee shall also have permit coverage for all facilities owned, or operated by SVID that are required to be covered under the General NPDES Permit for Stormwater Discharges Associated with Industrial Activities.
- c. The O&M Plan shall include sufficient documentation and records as necessary to demonstrate compliance with the O&M Plan requirements above. These records will be on file at the Sunnyside Valley Irrigation District Office.
- d. Train all employees whose construction, operations, or maintenance job functions may impact stormwater quality.

PERFORMANCE MEASURE

S6.D.6.a. Develop and implement an O&M Plan to minimize stormwater pollution, by 02/2010

GOAL

Secondary Permittees must develop and implement a municipal operation and maintenance (O&M) plan to minimize stormwater pollution from activities conducted by SVID. The O&M Plan shall include appropriate pollution prevention and good housekeeping procedures for all of the following operations, activities, and/or types of facilities that are present within the SVID office facility boundaries.

- i. Stormwater collection and conveyance system, including catch basins, stormwater sewer pipes, open channels, culverts, structural stormwater controls, and structural runoff treatment and/or flow control facilities. The O&M Plan shall address, but is not limited to:
 - a. Scheduled inspections and maintenance activities, including cleaning and proper disposal of waste removed from the system. Secondary Permittees shall properly maintain stormwater collection and conveyance systems owned or operated by the Secondary Permittee and regularly inspect and maintain all structural post-construction stormwater BMPs to ensure facility function
 - b. For facilities located in Eastern Washington, Secondary Permittees shall establish maintenance standards that are as protective as or more protective of facility function than those specified in Chapters 5, 6 and 8 of the 2004 *Stormwater Management Manual for Eastern Washington*.
 - c. Secondary Permittees shall conduct spot checks of stormwater treatment and flow control facilities following a 24 hour storm event with a 10-year or greater recurrence interval.
- ii. Roads, highways, and parking lots. The O&M Plan shall address, but is not limited to: deicing, anti-icing, and snow removal practices; snow disposal areas; material (e.g. salt, sand, or other chemical) storage areas; all-season BMPs to reduce road and parking lot debris and other pollutants from entering the MS4.
- iii. Vehicle fleets. The O&M Plan shall address, but is not limited to: storage, washing, and maintenance of municipal vehicle fleets; and fueling facilities. Secondary Permittees shall conduct all vehicle and equipment washing and maintenance in a self-contained covered building or in designated wash and/or maintenance areas.

- iv. External building maintenance. The O&M Plan shall address, building exterior cleaning and maintenance including cleaning, washing, painting and other maintenance activities.
- v. Parks and open space. The O&M Plan shall address, but is not limited to: proper application of fertilizer, pesticides, and herbicides; sediment and erosion control; BMPs for landscape maintenance and vegetation disposal; and trash management.
- vi. Material storage areas, heavy equipment storage areas, and maintenance areas. Secondary Permittees shall develop and implement a Stormwater Pollution Prevention Plan to protect water quality at each of these facilities owned or operated by the Secondary Permittee and not covered under the General NPDES Permit for Stormwater Discharges Associated with *Industrial Activities* or under another NPDES permit that covers stormwater discharges associated with the activity.
- vii. Other facilities that would reasonably be expected to discharge contaminated runoff. The O&M Plan shall address proper stormwater pollution prevention practices for each facility. Other facilities that would reasonably be expected to discharge contaminated runoff. The O&M Plan shall address proper stormwater pollution prevention practices for each facility.

EXISTING ACTIVITIES

1. An O&M plan exists to minimize stormwater pollution from irrigation return flow activities. All drains, joint drains, and wasteways are inspected after storms and checked for debris. A policy is in place for citizens and landowners to call SVID after hours for emergency stormwater damage notification.
2. SVID performs routine cleaning of all drains, joint drains, and wasteways.
3. SVID currently uses Chapters 5, 6, and 8 of the 2004 *Stormwater Management Manual for Eastern Washington* and requires all contractors to use the guidelines as well in a binding contract.
4. The Office facility and the yard are cleaned of debris once a week and spot checked between the routine cleaning.
5. All vehicle washing is done in a designated wash pad with an oil and water separator. The sludge is hauled off site in an environmentally sensitive manner via a contract hauler. Documentation of hauling is available on file at the district office.
6. All maintenance of heavy equipment is done in a self-contained covered building. All used oil and oil filters are contract hauled off site in an

environmentally sensitive manner. Documentation of hauling is available on file at the district office.

7. BMPs for landscaping maintenance are used by a contract provider. All herbicides and fertilizers are properly applied with no run off.

MEASURABLE ACTIVITIES

1. Formalize the existing stormwater plans for the maintenance shop and heavy equipment yards.
2. Track after hour calls of stormwater flooding in the City of Sunnyside city limits.

ASSESSMENT

1. Retain inspection forms of drains, joint drains, and wasteways.
2. Report results of inspections and repairs and predict trends.

PERFORMANCE MEASURE

S6.D.6.b. Secondary Permittees shall have NPDES coverage for stormwater discharges associated with Industrial Activities

GOAL

To have all required permits.

EXISTING ACTIVITIES

No additional permit is required at this time.

MEASURABLE ACTIVITIES

None to date.

ASSESSMENT

If required, a permit would be obtained.

PERFORMANCE MEASURE

S6.D.6.c. O&M Plan shall include sufficient documentation and records

GOAL

To electronically store Good Housekeeping records and have documentation on site at the SVID District Office Facility.

EXISTING ACTIVITIES

1. A daily electronic record of the Maintenance Shop employee tasks and activities is routinely circulated to SVID personnel. The vehicle maintenance and cleaning of the associated equipment and storage yards is recorded by the Maintenance Shop.
2. The Water Quality Laboratory has a weekly report distributed to SVID personnel and lists the bacteria and turbidity tests if stormwater discharge is sampled. A bacterium sampling protocol is in place if suspected bacteria are in a drain. A stormwater sampling protocol for the Sunnyside Canal is in place for a 2 year plus storm event.
3. A daily electronic record of the Drain Crew employee tasks and activities is routinely circulated to SVID personnel. This report will record any crew activity in the drains within the city limits in the City of Sunnyside.

MEASURABLE ACTIVITIES

1. Place all electronic records for the Maintenance Shop and Water Quality weekly reports in a file that can be readily accessed by SVID personnel.

ASSESSMENT

1. An electronic file will document the tasks.

PERFORMANCE MEASURE

S6.D.6.d. Train all employees whose job may impact stormwater quality.

GOAL

Train all employees whose job may impact stormwater quality.

EXISTING ACTIVITIES

SVID has a Safety and Training Coordinator on staff. The Coordinator addresses stormwater quality at safety meetings along with other pertinent safety information. The Coordinator conducts meetings or supplies information for staff training meetings during the year. Signed safety sheets along with the prepared safety information are filed for documentation. These training sessions include:

1. Annual All staff safety meeting, held each December
2. Annual Ditchriders meeting
3. Annual Public Operator Spray License meeting
4. Annual Acrolein crew safety meeting
5. Monthly safety meeting which has both union and management representation and an elected individual from each division
6. Weekly staff safety meetings are held by each supervisor with their crew; Coordinator supplies information for the meeting

MEASURABLE ACTIVITIES

1. Managers and Supervisors will identify those departments and employees who require training. Staff will be trained in:
 - i. The importance of protecting water quality,
 - ii. The requirements of this Permit,
 - iii. Operation and maintenance requirements,
 - iv. Inspection procedures,
 - v. Ways to perform their job activities to prevent or minimize impacts to water quality, and
 - vi. Procedures for reporting water quality concerns, including potential

1. SVID will train employees in-house or bring in certified trainers.

ASSESSMENT

1. A record of the training event and the list of training materials will be on file.
2. Records of the date, location, and employees in attendance will be maintained.

Abbreviations and Acronyms

AKART – All Known, Available, and Reasonable Methods of Control and Treatment
BMP – Best Management Practices
Co-Permittees – City of Sunnyside
COS - City of Sunnyside
Ecology – Washington State Department of Ecology
ESA – Endangered Species Act
GIS – Geographic Information System
IDDE – Illicit Discharge Detection and Elimination System
ILA – Interlocal Agreement or Intergovernmental Local Agreement
LID – Low Impact Development
MEP – Maximum Extent Practicable
MS4 – Municipal Separate Storm Sewer System
NOI – Notice of Intent
NPDES – National Pollutant Discharge Elimination System
O&M – Operation and Maintenance
POTW – Publicly Owned Treatment Works
RCW – Revised Code of Washington State
RSL – Regional Stormwater Lead
RSPG – Regional Stormwater Policy Group (Yakima County, City of Yakima, City of Union Gap, City of Sunnyside)
RSWG – Regional Stormwater Working Group (Yakima County, City of Yakima, City of Union Gap, City of Sunnyside)
RSWMP – Regional Stormwater Management Program
SVID – Sunnyside Valley Irrigation District
SWPPP – Stormwater Pollution Prevention Plan
TBD – To be Determined
TMDL – Total Maximum Daily Load
TSS – Total Suspended Solids
UA – Urbanized Area
UGA – Urban Growth Area
UIC – Underground Injection Control
USEPA – United States Environmental Protection Agency
WAC – Washington Administrative Code