PROGRAM ACTIVITIES FOR 2022

PERMIT # WAR045701

Following are the 2022 planned program activities to reduce the discharge of pollutants from Western Washington University's stormwater systems to the maximum extent practicable and to protect the water quality of out-flowing waterways.

The goal is to strengthen the activities of past years and to identify new topics resulting from any required permit changes. Many topics remain the same as those in Program Activities for 2016.

Coordination

- Through the departments of Facilities Development and Operations (FDO) and Environmental Health and Safety (EHS), the University will actively maintain open communication with the City of Bellingham's (CoB) Public Works Department, operators of other local MS4s, and the Washington State Department of Ecology (DoE) to exchange best practices and address issues and concerns.

Public Education and Outreach

- Prepare and distribute educational information to students and staff on the impact of stormwater discharges on receiving water and the steps than can be taken to reduce pollutants in stormwater runoff.

- EHS will assist in providing stormwater training and related materials to the campus student Residence Halls EcoReps. The EcoReps are elected sustainability representatives for leadership in energy and material conservation in campus residence halls. EcoReps are typically trained in November each year.

- FDO will provide additional stormwater management program (SWMP) information through the University's Communication online publication "Western Today" at https://westerntoday.wwu.edu and through the FM Director's "Desk Notes" which are published quarterly.

Public Involvement and Participation

- Maintain Western's SWMP website https://www.fm.wwu.edu/facilities-maintenance-operations/stormwater-management-program/ and promote use for public information and comment. FDO or EHS will periodically list applicable Stormwater Management topics on the university's Western Today webpage at https://westerntoday.wwu.edu

Illicit Discharge Detection and Elimination

- Comply with all relevant ordinances, rules, and regulations of CoB that govern non-stormwater discharges, construction phase stormwater pollution prevention measures, and post-construction stormwater pollution prevention measures, including proper operation and maintenance of MS4.

- Maintain SWMP policies and procedures; adopt additional policies and procedures as necessary.

- Conduct field inspections and visually inspect for illicit discharges at all known outfalls of MS4. Inspection activities include identification and removal of any illicit discharges and recording of inspections and follow-up activities.

- Continue to provide training for all relevant staff on proper Best Management Practices (BMP) to prevent spills and illicit discharges.

- Establish a BMP database with specific controls, examples, and photos for WWU personnel to follow.

- EHS will provide initial training that will closely follow WWU SWMP to new employees whose construction, operations, or maintenance job functions may impact stormwater quality. SWMP training along with BMPs will be an annual requirement for those employees. Refresher training may be required more frequently for employees whose job functions more readily may impact stormwater quality.

- All employees in the Outdoor Maintenance Shop will use secondary containment for any transport of pesticides across campus. Additionally, ALL portable liquid fuel tanks are to be approved secondary containment type containers.

- All FDO personnel who transport hazardous materials will be provided training, necessary secondary containment, and personal protective equipment (PPE) as required when doing their assigned work. A review of hazardous materials will determine which FM shops are provided with this additional training.

- EHS will provide additional training for secondary containment across campus to any other departments that may at some time transport hazardous materials. A review of hazardous materials will determine which campus personnel are provided with this additional training.

- In the event of an illicit discharge, FDO will respond and take appropriate corrective action. FDO will then coordinate with EHS to make the call to DoE, reporting the incident in order to have an Environmental Report Tracking System (ERTs) report generated. The ERTs report is to be sent to the FDO SWMP manager for electronic filing. All ERTs reports will then be attached to the online annual Stormwater Report.

South Campus and Lincoln Creek Parking Lots Stormwater Runoff Control

- The south campus Stormwater Detention Vault and Bio-swale Filtration System were upgraded in the summer of 2012. The public works project (PW656) included modifications to the stormwater detention vault that is beneath the tennis courts. Flow control and sediment trapping features were added to the existing vault including improved engineered maintenance components to enhance the water quality flowing into the filtration elements. Monitoring of the outflow into Taylor Creek will determine how well the new improvements have worked.

- The Bio-swale Filtration System south of Bill MacDonald Way had a new catch basin installed, as mentioned above with PW 656, for better sediment control and improved maintenance. The entire bio-swale existing vegetation and base materials were removed to improve the water quality that flows into Taylor Creek. New base materials and vegetation were installed. Continue to monitor the bio-swale discharge into Taylor Creek.

- Provide training, or coordinate with existing training programs, to educate relevant staff in erosion and sediment control BMPs and requirements, or hire trained contractors to perform the work.

- FDO Outdoor Maintenance provides maintenance and repair work for all campus parking lots including the Lincoln Creek Transportation Center (LCTC).

- Improve response to any turbid water discharge from LCTC. FDO and EHS will work in association with Outdoor Maintenance personnel in addressing turbid water issues.

- Involve EHS more into the mainstream provisions of the MS4 permit to assist with training and compliance issues, especially with the transportation of hazardous chemicals. See attachments to the 2011 report.

- Continue to explore temporary solutions for FY2022-23 and future funding to LCTC stormwater issues. The future completion of phased work would have resolved the stormwater issues at this site. Economic downturn has left this as an unfunded project from the state. The main concern was the access apron into and out of the

parking lot. Small works project SP013 reconfigured the area of water collection and installed improved catch basins. This work was completed in the summer of 2012. The resulting construction project has significantly reduced stormwater tracking out to Lincoln Street. Surface water runoff near the road outlet to Lincoln Street continues to be a concern. Continue to monitor stormwater tracking out to Lincoln Street.

Construction Site Stormwater Runoff Control

- Comply with all relevant ordinances, rules, and regulations of CoB and other applicable local jurisdictions that govern construction phase stormwater pollution prevention measures.

- The Office of Facilities Development & Capital Budget (FDCB) has the responsibility to monitor and manage public works contractors on campus. Stormwater management is part of their requirement for construction sites and must comply with CoB construction requirements as well as those through Bellingham's Department of Public Works.

- As required, obtain National Pollutant Discharge Elimination System (NPDES) permits that cover the stormwater discharges associated with the construction activity, prior to discharging.

- Provide training, or coordinate with existing training programs, to educate relevant staff in erosion and sediment control BMPs and requirements, or hire trained contractors to perform the work. EHS will provide refresher training to FDO project managers on a specified time frame throughout the project as determined by EHS. Nominally this will be annual.

- Coordinate with DoE or CoB to provide access for inspection of construction sites or other land disturbances greater than or equal to one acre.

Post-Construction Stormwater Management for New Development and Redevelopment

- Comply with all relevant ordinances, rules, and regulations of DoE and CoB that govern post-construction stormwater pollution prevention measures.

- Comply with the Minimum Technical Requirements for post-construction stormwater controls for new development and redevelopment of construction sites or other land disturbances greater than or equal to one acre.

Pollution Prevention and Good Housekeeping Maintenance and Operation (M&O)

- A permit system has been initiated by EHS and FM that requires signed approval by EHS prior to any soil disturbance over 5 cubic feet. This is a pre-work inspection where all of the PPE and preventive stormwater BMPs must be in place and signed off by EHS. It is similar in nature to a "hot work permit" system, commonly used in maintenance and construction industries. These pre-work inspected work conditions ensure that precautionary materials, equipment, and processes are in place, should there be a spill, to prevent stormwater pollution.

- All FDO vehicles and select powered equipment will have an onboard spill kit. These will vary in size but will have basic spill response materials such as booms, absorbent pads, safety gloves, a safety suit, and a plastic waste material storage bag. Said vehicles and equipment will have visible labels stating "spill kit inside". FDO employees are expected to respond if they see any type of leak to minimize stormwater pollution and to immediately notify their supervisors, the FM Work Control Center, and EHS.

- FDO's main complex will have stormwater catch basin covers available near each catch basin. Correctly sized catch basin covers are stored in clearly marked PVC storage tubes.

- Three large spill response kits with wheels are available on WWU's campus. These response kits can be rolled or lifted into the back of a pickup truck.

    - Two sizeable spill response kits on wheels are located on the main Bellingham campus: one at the FDO Maintenance Warehouse (MW) room 105 and one in the Science, Math and Technology Education (SMATE) building, main mechanical room number 101.
    - The third kit is at the Shannon Point Marine Center located at Shannon Point in Anacortes, Washington. It is located under the overhang of the main three-story research building.

- Coordinate inspection of WWU stormwater collection systems with CoB stormwater inspectors and specialists for annual stormwater inspections.

- Maintain a maintenance and operation (M&O) plan, including pollution prevention and good housekeeping procedures, to minimize stormwater pollution from activities conducted by WWU. The M&O plan includes relevant training of all employees whose construction, operations, or maintenance job functions may impact stormwater quality.

- FM will continuously improve the internal tracking measures for M&O through the campus facilities Asset & Inventory management (AiM) system. Annual maintenance for stormwater management is recorded here.

Reporting Requirements

- No later than March 31, 2022, submit an Annual Report to the DoE, using the online Secure Access Washington reporting method: https://secureaccess.wa.gov/myAccess/saw/select.do

- No later than December 31, 2022, prepare the updated Program Activities for 2023 and update the relevant SWMP documents.

General Conditions

- Comply with the general conditions of the stormwater permit as identified by the DoE in accordance with the following:

  Discharges and activities consistent with terms and conditions of permit
  Proper operation and maintenance
  Spill notification
  Prohibition of intentional stormwater bypass
  Right of entry allowed
  Duty to mitigate
  No conveyance of property rights
  Compliance with other laws and statutes
  Monitoring
  No re-entry of removed substances
  Severability
  Revocation of coverage
  Transfer of coverage
  General permit modification and revocation
  Reporting a cause for modification or revocation
  Appeals
  Penalties
  Duty to reapply
  Certification and signature
  Non-compliance notification