PROGRAM ACTIVITIES FOR 2012

Following are the activities that will occur during 2012 to reduce the discharge of pollutants from Western Washington University's storm water system to the maximum extent practicable and to protect the water quality of out-flowing waterways.

Coordination

- The University, through the department of Facilities Management (FM) and the University's Environmental Health and Safety office (EHS) will actively maintain open communication with the City of Bellingham's department for storm water management, operators of other local MS4's, and the Department of Ecology 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 storm water discharges on receiving water and the steps than can be taken to reduce pollutants in storm water runoff.
- The Environmental Health and Safety office (EHS) will assist in providing Stormwater training and training 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.
- FM will provide additional Stormwater Management information through the University's Communication online publication "Western Today" @ (http://www.onlinefast.org/wwutoday/) and through the FM Director's "Desk Notes" @ (http://www.onlinefast.org/wwutoday/search/node/desk%20notes)

Public Involvement and Participation

- Maintain Western's SWMP website (http://www.wwu.edu/depts/fm/index.shtml) and promote use for public information and comment. FM or EHS will periodically list applicable Stormwater Management topics on the university's main webpage @ http://www.onlinefast.org/wwutoday/

Illicit Discharge Detection and Elimination

- Comply with all relevant ordinances, rules, and regulations of the local jurisdiction (CoB) that govern non-storm water discharges; construction phase

storm water pollution prevention measures; and post-construction storm water 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 to 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.
- The University's Environmental Health and Safety office (EHS) will provide initial training that will closely follow WWU' SWMP to new employees whose construction, operations, or maintenance job functions may impact storm water quality. SWMP training along with BMP's will be an annual requirement for those employees. Refresher training nominally will be semi-annual or more frequent for employees whose job functions more readily may impact storm water quality.
- All WWU employees in the Outdoor Maintenance Shop will use secondary containment for any transport of pesticides across campus. Additionally ALL portable fuel tanks are to be approved secondary containment type containers.
- All Facilities Management personnel that transport hazardous materials will be provided training and necessary secondary containment Personal Protective Equipment (PPE) as required 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 sometime transport hazardous materials. A review of hazardous materials will determine which campus personnel are provided with this additional training.

<u>Gravel Parking Lots Storm Water Runoff Control</u>

- The south campus Stormwater Detention Vault and Bio-swale Filtration System will be upgraded summer 2012. The public works project, PW656

Stormwater Detention Facility Restoration, will include modifications to the stormwater detention vault that is beneath the south campus tennis courts. Flow control and sediment trapping features will be added to the existing vault including improved engineered maintenance components to enhance the water quality flowing into the filtration elements south of Bill MacDonald Way.

- Additionally included in PW656 is the renovation of the Bio-swale Filtration System south of Bill MacDonald Way. A new primary catch basin will be installed for better sediment control and improved maintenance. The entire Bio-swale Filtration System will have the existing vegetation and base materials removed. New filtration vegetation and base materials will be installed to improve water quality that flows into Taylor Creek.

- Stormwater runoff control measure features will be reworked at the Lincoln Creek Transportation Center (LCTC). Improved filtration, additional catch basins and flow direction will be installed at the main access/egress point into this parking facility.

- 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. Parking Services, under the Department of Public Safety, 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 the gravel parking lots. FM and EHS will work in association with the Parking Services maintenance personnel in addressing turbid water issues.

- Involve the University's EHS office 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.

- Facilities Management has requested funding through the campus Capital Budget Office for FY13-15 to the Washington State Legislature to replace the gravels lots on campus and provide a maintainable surface where WWU can meet the requirements of its secondary MS4 permit with the CoB. Facilities Management will monitor this funding request for approval.

- Continue to explore temporary solutions for FY2012 and future funding to the Lincoln Creek Transportation Center (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.

Construction Site Storm Water Runoff Control

- Comply with all relevant ordinances, rules and regulations of the City of Bellingham, and other applicable local jurisdictions that govern construction phase storm water 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 requirements for construction sites and must comply with Bellingham city construction requirements as well as those through Bellingham Public Works.
- Obtain, as required, National Pollutant Discharge Elimination System (NPDES) permits that cover the storm water 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. The EHS department will provide refresher training to FM project managers on a specified time frame throughout the project as determined by EHS. Nominally this will be an annual requirement.
- Coordinate with the Department of Ecology, or local jurisdiction, to provide access for inspection of construction sites or other land disturbances greater than or equal to one acre.

Post-construction Storm Water Management for New Development and Redevelopment

- Comply with all relevant ordinances, rules and regulations of the City of Bellingham, and other applicable local jurisdictions that govern post-construction storm water pollution prevention measures.
- Comply with the Minimum Technical Requirements for post construction storm water 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. This is a pre-work inspection where all of the PPE and preventive storm water BMP's must be in place and signed off by EHS. It is similar in nature to a "hot work permit" in major

construction. These pre-work inspected work conditions ensure that precautionary materials and equipment is in place should there be a spill to prevent storm water pollution.

- All Facilities Management 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 will have visible labels for “spill kit inside”. FM employees are expected to respond if they see any type of leak to minimize storm water pollution and to immediately notify their supervisors and the FM Work Control Center and EHS.

- The Facilities Managements main complex will have storm water 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 Facilities Management Maintenance Warehouse (MW), south campus and one in our SMATE (Science, Math and Technology Education) facility main mechanical room, central campus.

- The other is at the Shannon Point Marine Center @ Shannon Point, Anacortes, Washington. It is located under the overhang of the main 3 story research building.

- Maintain a maintenance and operation plan, including pollution prevention and good housekeeping procedures, to minimize storm water 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 storm water quality.

- FM will move to improve the internal tracking measures for M & O through the campus Facilities Administration Management Information System (FAMIS). Annual maintenance for Stormwater Management is recorded here.

<u>Reporting Requirements</u>

- No later than December 31, 2012 prepare program activities for 2013 and update the relevant SWMP documents.

- No later than March 31, 2012, submit an Annual Report to the Department of Ecology, using the forms provided.

General Conditions

- Comply with the general conditions of the storm water permit as identified by the Department of Ecology in accordance with the following:

Discharges and activities consistent with terms and conditions of permit
Proper operation and maintenance
Spill notification
Prohibition of intentional storm water 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