

PROGRAM ACTIVITIES FOR 2015

PERMIT # WAR04-5701

Following are the 2015 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 in Program Activities for 2012. Some minor changes have been added or deleted.

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 (CoB) Public Works Department, operators of other local MS4's, and the Washington State Department of Ecology to exchange best practices and address issues and concerns. This will include new changes to the extended permitting process for renewal of the 2012 Department of Ecology Stormwater Management Permit.

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 that can be taken to reduce pollutants in stormwater runoff.
- The Environmental Health and Safety office 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. EcoReps are trained typically in November each year.
- FM will provide additional stormwater management program (SWMP) information through the University's Communication online publication "Western Today" at <http://www.onlinefast.org/wwutoday/> and through the FM Director's "Desk Notes" which is published quarterly.

Public Involvement and Participation

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- Maintain Western's SWMP website <http://www.wvu.edu/fm/StormWaterMgmt/index.shtml> and promote use for public information and comment. FM or EHS will periodically list applicable Stormwater Management topics on the university's Western Today webpage at <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-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.
- The University's Environmental Health and Safety office 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 BMP's 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 WWU 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 Facilities Management personnel that transport hazardous materials will be provided training and necessary secondary containment and personal protective equipment (PPE) as required doing their assigned work. A review of

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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.

Gravel Parking Lots Stormwater Runoff Control

- The south campus Stormwater Detention Vault and Bio-swale Filtration System was 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 in PW 656, for better sediment control and improved maintenance. The entire Bio-swale existing vegetation and base materials were removed to improve 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.
- 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). FM provides additional services and assistance to Parking Services as needed.
- 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.

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- Facilities Management is requesting funding through the campus Capital Budget Office for Fiscal Years (FY) 2015-2017 to the Washington State Legislature to replace the gravel lots on the south portion of 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 FY2015 and future funding to the Lincoln Creek Transportation Center 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. A 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 into 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 the City of Bellingham, 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 requirements for construction sites and must comply with Bellingham City construction requirements as well as those through Bellingham's Department of Public Works.
- Obtain, as required, 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. 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 annual.

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- 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 Stormwater 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 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 BMP's 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 Facilities Management 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 for "spill kit inside". FM 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.
- The Facilities Management'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 Facilities Management Maintenance

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Warehouse (MW) room 105 and one in the Science, Math and Technology Education (SMATE) facility main mechanical room number 101.

- The other 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 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 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.

Reporting Requirements

- No later than March 31, 2015, submit an Annual Report to the Department of Ecology, using the forms provided.
- No later than December 31, 2014 prepare Program Activities for 2015 and update the relevant SWMP documents.

General Conditions

- Comply with the general conditions of the stormwater 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 stormwater bypass
Right of entry allowed
Duty to mitigate
No conveyance of property rights
Compliance with other laws and statutes

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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