

Our NPDES Phase II Municipal Stormwater Permit requires that we implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program is to include:

- i. Application of operational source control BMPs, and if necessary, structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities.
- ii. Inspections of pollutant generating sources at publicly and privately owned institutional, commercial, and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4.
- iii. Application and enforcement of local ordinances at sites, including sites with discharges authorized by a separate NPDES (i.e., Industrial) permit.
- iv. Practices (BMP's) to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers from the sites identified in the inventory.

No later than August 1, 2022, we must adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.

- Completed. Ordinance 6877 adopted July 18, 2022.

No later than August 1, 2022, we must establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4.

- An inventory has been prepared using 2022 business license information provided by the Community Development Department. The inventory was reduced to approximately 1505 businesses by removing business types that are not included in Appendix 8 and are not thought to be potential sources of pollutants.
- Additional sites will be added to the inventory and inspected based on credible complaints received.
- The inventory will be updated to account for new businesses or changes in use.

No later than January 1, 2023, we must implement an inspection program for sites on our inventory. We are required to annually conduct inspections equal to 20% of the number of businesses in our inventory. Re-inspections count as a separate inspection. (Twenty percent of 1505 equals 301 annual inspections).

- Electronic newsletter articles introducing the Business Inspection Program were sent to Auburn businesses through the Chamber of Commerce in October, November and December of 2022.
- A brochure was developed on source control best management practices which will be handed out during inspections.
- Keep the Lid Closed posters and stickers were printed to use as outreach material, and to further expand our public education behavior change program.
- A program rollout document was finalized in December of 2022 outlining the City's plan for implementing the Source Control Inspection Program beginning in January of 2023.

No later than January 1, 2023, we are to implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as outlined in the Permit.

- The Source Control Pollution Prevention Program Inspection Standard Operation Procedures document was completed in September of 2022 which documents the City's progressive enforcement procedures.

We are to train staff who are responsible for implementing the source control program to conduct these activities.

- Two inspection staff and the Storm Drainage Engineer attended the October 2022 Source Control Inspection Training course in Federal Way.