

PROGRAM ACTIVITIES FOR 2011

Following are the activities that will occur during 2011 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), 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 that can be taken to reduce pollutants in storm water runoff.
- 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.wvu.edu/depts/fm/>) and promote use for public information and comment.

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.

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- 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.
- All Facilities Management personnel that transport hazardous materials will be provided training and necessary secondary containment Personal Protective Equipment (PPE) as required to do 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 might at sometime transport hazardous materials. A review of hazardous materials will determine which campus personnel are provided with this additional training.

Gravel Parking Lots Storm Water Runoff Control

- 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 Parking Lots.
- Improve response to any turbid water discharge from the gravel parking lots.
- 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.

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- Initiate the request for funding through the 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. Coordination for funding requests will be through the University's EHS office and Facilities Management.

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.
- 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 semi-annual.
- 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)

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

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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)

Reporting Requirements

- No later than March 31, 2011, submit an Annual Report to the Department of Ecology, using the forms provided.
- No later than December 31, 2011 prepare program activities for 2012 and update the relevant SWMP documents.

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