



Water Quality Program

Permit Submittal Electronic Certification

Permittee: MILL CREEK CITY

Permit Number: WAR045529

Site Address: 15728 MILL CRK BLVD
MILL CREEK, WA 98012

Submittal Name: MS4 Annual Report Phase II Western

Version: 1

Due Date: 3/31/2024

Questionnaire

Number	Permit Section	Question	Answer
1	S5.A	Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.	Not Applicable
2	S5.A	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)	2024 Stormwater Management Pla_2_04012024163611
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.	Yes
4	S5.A.5.b	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)	Yes
5	S5.C.1.	Have you convened an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program? (S.5.c.1). August 1, 2020	Yes
14	S5.C.1.b	Did you submit a report as described in S5.C.1.b.i(b)? (Required to submit no later than January 1, 2023)	Yes Comment: The City provided a copy of the relevant section of the Capital Improvement Plan and copies of relevant questions from previous NPDES Phase II annual report questions relating to this reporting requirement.
15	S5.C.1.c	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)	No
16	S5.C.1.c	From the assessment described in S5.C.1.c.i (a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)	No
20	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)	No

21	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.	2023 Summary of General Awareness_21_03122024140817
24	S5.C.2	Began implementing strategy outlined in S.5.C.2.a.ii(c) (S5.C.2.a.ii(d) – Required by April 1, 2021)	Yes
25	S5.C.2	Attach the report developed in accordance with S5.C.2.a.ii(e), which evaluated the changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy and any planned or recommended changes to the program in order to be more effective. (Required no later March 31, 2024)	Not Applicable
26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.	No Comment: Staff and communication platform resources necessary to support an active participation by residents, beyond those described in general awareness efforts, were not available during 2023.

27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a)	The primary means used in Mill Creek are online social networking to direct the public to either web-based or public City Council meetings. As the primary overburdened/disadvantaged demographic in Mill Creek are the elderly and/or disabled and there is widespread access to the internet within the city, online participation is an important tool for involving our public. The public engagement element has lagged as overall SMAP development itself has been delayed, due to continued staff shortages, lack of other internal resources (i.e. GIS) and unresolved approaches to management on a private property at the top of the watershed, but as of August 2023, engineering staff has grown, the availability and authorization of ARPA funds to secure contracts has increased, and repair needs to stormwater infrastructure in the selected subbasin have necessitated engagement with affected residents for developing a scope of work, request for proposals, contractor selection, site visits and preliminary design and schedule development.
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)	Yes
28a	S5.C.3.	List the website address in Comments field.	www.millcreekwa.gov
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii?	Yes
30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)	Yes

30a	S5.C.4.	Attach a spreadsheet that lists the known outfalls' size and material(s).	2023 Inventory of Mapped Storm_30a_030420241 93355
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)	No
33	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste? (S5.C.5.b)	Yes
33a	S5.C.5	Actions taken to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.	General information provided under the Surface Water Topics section of the city's website. Also found under relevant sections of the Municipal Code (available online). Additionally featured on educational material at public events, both those sponsored by the city and those sponsored by other organizations.
34	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.	Yes
35	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.	Yes
35a	S5.C.5	Cite field screening methodology in Comments field.	Visual and olfactory evaluations of water and sediments, along with measured accumulations to assess potential exceedance of maintenance standards, observed during required catch basin and stormwater facility inspections.
36	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)	2
36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened.	The City used the Source Control (Business/Site) Inspection Program Guidance Manual, Herrera 2022.
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.)	58

38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)	It is posted on the city's website, and advertised through social media. The contact phone number has also been provided to the local fire district and the two water/sanitary sewer utility districts all serving Mill Creek.
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.	No
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.	No
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f.	Yes
42	S5.C.5	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12.	WAR045529-2023-ImportedIDDEs_04012024162546
43	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.	Yes
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)	0
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)	0
47	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)	Yes
47a	S5.C.6.	Number of site plans reviewed during the reporting period.	1
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential?	Yes
48a	S5.C.6.	If no, inspected, prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)?	Yes
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.	Yes
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii.	1

49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv?	Yes
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v)	Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)	Yes
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv) (S5.C.7.c.viii)	0
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)	No
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d)	Yes
55	S5.C.6.	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e)	Yes
56	S5.C.7.	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.7.a.?	Yes
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a)	No
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard.	Yes
59a	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.	Not Applicable
60	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))?	Yes

61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b)	No
61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b)	Not Applicable
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii)	No
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	No
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	37
63b	S5.C.7.	Number of facilities inspected during the reporting period.	37
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period.	0
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i.	Not Applicable
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.	Yes
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.7.c.iii)	No
66a	S5.C.7.	Number of known catch basins?	4036
66b	S5.C.7.	Number of catch basins inspected during the reporting period?	0
66c	S5.C.7.	Number of catch basins cleaned during the reporting period?	0 Comment: The City of Mill Creek lacks its own vector capabilities for catch basin cleaning and must contract with outside resources. The contracting and performance for this service was unable to be completed before fall and winter rains eliminated the prospect of anything other than emergency cleaning until the return of predictably dry weather.
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii.(a)-(c))	Not Applicable
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d)	Yes

70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e)	Yes
71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f)	Yes
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.)	Yes
74a	S5.C.8	Number of total sites identified for the inventory.	368
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023).	Yes
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023).	No Comment: Implementing a progressive enforcement policy per S5.C.8.b.iv has lagged as Mill Creek continues to have limited staff available to support progressive code enforcement. A G20 letter will be submitted.
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv.	Summary of Actions Taken to Im_77_03072024165507
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken.	Business Inspections Completed_78_03072024165507
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v?	No
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)	Yes
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)	WQ sampling for North Creek TM_81_03062024092706
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)	Yes
84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?	Yes

87	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, attach a data and analysis report per S8.C.1. and Appendix 9. (Due annually beginning March 31, 2021.)	Not Applicable
88	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)	Yes
89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Yes
90	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)	Not Applicable
91	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
92	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)	Not Applicable
93	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)	Yes
94	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.	18
94a	G20	List permit conditions described in non-compliance notification(s).	S5.A.3 S5.C.1.b.i.(b) S5.C.1.c.i. S5.C.1.c.i(a) S5.C.1.d.iii S5.C.2.a.iii. S5.C.5.d.i. S5.C.5.d.iii. S5.C.5.e. S5.C.6.c.vi S5.C.7.b.i(b) S5.C.7.b.ii S5.C.7.c.i S5.C.7.c.iii S5.C.8.b.ii S5.C.8.b.iv S5.C.8.b.iii S5.C.8.b.v

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Date