Stormwater Management Program (SWMP)

SERVING AGRICULTURE SINCE 1906

PROGRAM – Year 18
April 2025

Written description as required by the State of Washington Department of Ecology: Eastern Washington Phase II Municipal Stormwater Permit

National Pollutant Discharge Elimination System and State Waste Discharge General Permit for Discharges from Small Municipal Separate Storm Sewers in Eastern Washington

In compliance with the provisions of The State of Washington Water Pollution Control Law Chapter 90.48 Revised Code of Washington
and
The Federal Water Pollution Control Act
(The Clean Water Act)
Title 33 United States Code, Section 1251 et seq.

Sunnyside Valley Irrigation District
120 South 11th Street
P.O. Box 239
Sunnyside, WA 98944
Permittee Permit #WAR04-6204
2024 Annual Report due 03-31-2025
SWMP Plan on the SVID website: www.svid.org

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Abbreviations and Acronyms

AKART – All Known, Available, and Reasonable methods of prevention, control and Treatment
BMP(s) – Best Management Practice(s)
CITY or City - City of Sunnyside
CFR – Code of Federal Regulations
CESCL – Certified Erosion & Sediment Control Lead
CWA – Clean Water Act
DID – Drainage Improvement District
DR – SVID Drain
Ecology – Washington State Department of Ecology
ESA – Endangered Species Act
EWA – Eastern Washington
GIS – Geographic Information System
H&S – Health & Safety
IDDE – Illicit Discharge Detection and Elimination
ILA – Interlocal Agreement or Intergovernmental Local Agreement
JD – SVID Joint Drain
JHA – Jurisdiction Having Authority
LID – Low Impact Development
MEP – Maximum Extent Practicable
MS4 – Municipal Separate Storm Sewer System
NFPA – National Fire Protection Association
NOI – Notice of Intent
NPDES – National Pollutant Discharge Elimination System
O&M – Operation and Maintenance
POTW – Publicly Owned Treatment Works
Primary Permittee – City of Sunnyside
RCW – Revised Code of Washington State
RM – River Mile
RSWG – Regional Stormwater Working Group (Yakima County, City of Yakima, City of Selah, City of Union Gap, and City of Sunnyside)
RSWMP or RSMP – Regional Stormwater Management Program
Secondary Permittee – Sunnyside Valley Irrigation District
SVID or District – Sunnyside Valley Irrigation District
SWD – State Waste Discharge
SWMP – Stormwater Management Program
SWMP Plan – Stormwater Management Program Plan
SWPPP – Stormwater Pollution Prevention Plan
TBD – To be Determined
TMDL – Total Maximum Daily Load
TSS – Total Suspended Solids
UA – Urbanized Area
UGA – Urban Growth Area
USEPA – United States Environmental Protection Agency
WAC – Washington Administrative Code
WW – SVID Wasteway
YCHD – Yakima County Health District

Overview

1.1) Introduction

A Stormwater Management Program (SWMP) is a set of actions and activities designed to reduce the discharge of pollutants from a regulated Small Municipal Separate Storm Sewers (MS4) to the maximum extent practicable (MEP) and to protect water quality. The SVID Stormwater Management Program primarily focuses on the MS4 stormwater conveyance system located in the SVID Campus Facilities. The campus facilities consist of three areas which contain building structures, heavy equipment maintenance lots, and material storage yards. Area One encompasses the Administrative Main Office, the Maintenance Shop, Carpenters Shop, Propane Filling Station, and several associated outbuildings and sheds. Heavy equipment and vehicle fleet storage lots are also located directly north of the Administrative Main Office at 120 South 11th Street. All stormwater inlets associated with the parking lot of the Administrative Main Office are piped to the City's sanitary sewer located on E. Blaine Avenue. In Area Two there is the West Pipe Yard located on the west side of 11th street between Yakima Valley Highway and E. Blaine Avenue. Whereas, in Area Three there is the Field Office and East Pipe Yard located at 1105 Yakima Valley Highway. Figure 1 illustrates the SVID Campus Facilities and its boundaries. SVID did not make any significant stormwater management modifications or expansions within its campus facilities during the last 2024 calendar year.

1.2) SVID History

The Sunnyside Division encompasses all lands served by the Sunnyside Canal. The Sunnyside Division serves 94,614 irrigable acres and is comprised of the Sunnyside Valley Irrigation District (SVID), two ditch companies known as Konowac Ditch Company and Piety Flat Ditch Company, and the five cities of Zillah, Granger, Sunnyside, Grandview, and Prosser. The SVID provides irrigation service to roughly 92,000 acres with mostly senior, non-proratable rights. The Sunnyside Division has, in the aggregate, two-thirds senior or non-proratable rights and one-third junior or proratable rights.

The Sunnyside Division dates back to 1890 when the Northern Pacific Railroad began construction of the Sunnyside Canal. The United States Bureau of Reclamation (then known as the United States Reclamation Service) purchased the Sunnyside Canal in 1905 and by 1923 completed the Sunnyside Division of the Yakima Reclamation Project.

On March 10, 1906, the Sunnyside Water Users Association was formed to provide an entity to contract with the United States Reclamation Service. On January 22, 1917, the Sunnyside Valley Irrigation District was organized to replace the Sunnyside Water Users Association.

The Bureau of Reclamation operated the Sunnyside Division until 1945. Beginning with the 1946 irrigation season, SVID has operated and maintained its facilities as well as the joint use facilities of the Sunnyside Division.

SVID is a governmental entity and is not privately owned or operated for profit. It is operated by the landowners of the district for their mutual benefit.

1.3) Description of SVID Drainage System within the City of Sunnyside

In the early 1900's Drainage Improvement Districts (DID) were created to lower the groundwater table and to drain overland runoff due to excess irrigation flows from an area. This was achieved through collector surface ditches, and subsurface drains and pipes that discharge to other receiving waterbodies. One of these DIDs, DID 3 went under SVID authority in 1996 and was renamed the drain system DR 3. There are multiple dendritic and rectangular drainage patterns of DR 3; however, it is not a unique name for all the drains located strictly within the City of Sunnyside. In addition, two other DIDs came under SVID's authority and were renamed DR 19 and DR 20. The current status of these DIDs is that both DR 19 and DR 20 actively convey irrigation return flows east of Sulphur Wasteway. There are three joint drains (JD) that lie within the City limits. These joint drains are JD 33.4, JD 35.4, and JD 37.9.

A small segment of DR 3 begins in the West Pipe Yard. SVID drains, joint drains, and wasteways were constructed before the urban development and growth of the City. All DR 3 drains convey irrigation return flow water to joint drains JD 33.4 and JD 35.4, and Sulphur Wasteway. The JD 33.4 and JD 35.4 also conveys its water to Sulphur Wasteway. The Sulphur Wasteway then conveys its water to the Lower Yakima River at mile (RM) 61.0. The West and East Pipe yards (Areas Two and Three) are comprised mostly of pervious (or "permeable") dirt and gravel which allows a majority of precipitation and/or snowmelt within those campus facility areas to undergo infiltration.

The Sunnyside Valley Irrigation District operates as a Secondary Permittee whereas the City of Sunnyside is the Primary Permittee under the Eastern Washington (EWA) Phase II Municipal Stormwater Permit. The City of Sunnyside describes in their SWMP that SVID is the jurisdiction having authority (JHA) over its owned and operated drains, joint drains, and/or wasteways within incorporated city limits. Several City storm drain inlets have their pipe system outlets connected to the SVID irrigation return flow drains and/or joint drains within city limits, predominantly but not limited to DR 3 and JD 33.4.

SVID's secondary focus of this SWMP, as part of its Illicit Discharge Detection and Elimination (IDDE) program component, is to also improve water quality in its drainage system by identifying and eliminating any sources that contribute high densities of coliform bacteria (e.g., *Fecal coliform* and *E. coli*) to the SVID drains, joint drains, and wasteways districtwide, and within the City of Sunnyside (Figures 2 and 3). The upcoming 2025 yearly program activities will involve continuing coordination efforts with the City of Sunnyside in monitoring and assessing levels of bacteria concentration at specific DR 3 and JD 33.4 locations above and below the city boundary limits.

Additionally, it is the goal of SVID to work with the City of Sunnyside to identify and eliminate any illicit connections and/or discharges to SVID's drainage system.

1.4) Regulatory Environment

The Clean Water Act (CWA) institutes the basic structure for managing discharges of pollutants into the waters of the United States and establishing quality standards for surface waters. The first major legislation addressing pollution of the country's rivers, streams, and lakes was enacted in 1948, called the Federal Water Pollution Control Act. However, in 1972 Congress rewrote the act, known today as the CWA, to eliminate cumbersome enforcement mechanisms and provide more adequate protection for the nation's waters. The CWA authorizes the United States Environmental Protection Agency (USEPA or EPA) to implement pollution control programs such as setting wastewater standards for industry, and develop national water quality criteria recommendations for all contaminants in surface waters. Therefore, a National Pollution Discharge Elimination System (NPDES) program was created under the CWA to establish conditions and permitting for discharges of pollutants into the waters of the United States. The CWA made it unlawful for any person or entity to discharge any pollutant from a point source into waters of the United States, unless a NPDES permit was obtained under its provisions. According to Title 40 Code of Federal Regulations (CFR) 122.2 a "point source" means any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel, or other floating craft from which pollutants are or may be discharged. However, this term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

An NPDES permit is typically a license for a facility to discharge a specified amount of pollutant into a receiving water under certain conditions. Permits may also authorize facilities to process, incinerate, landfill, or beneficially use sewage sludge. The two basic types of NPDES permits issued are individual and general permits. An individual permit is tailored to one specific entity where discharge characteristics are variable and do not fit a general permit category. A general permit covers a group of dischargers with similar qualities within a given geographical location.

In addition, the CWA authorizes EPA to delegate the implementation of the NPDES permit program to state, tribal, and territorial governments, enabling them to perform many of the permitting, administrative, and enforcement aspects of the NPDES program. Currently 46 states and one territory have received authorization to administer the NPDES program. Washington State received its authorization to administer the NPDES permit program in 1973. The Department of Ecology (Ecology) is the Washington State agency that administers and write the NPDES permits, which in turn are also recognized as State Waste Discharge (SWD) permits. Several NPDES and SWD permits issued and implemented by Ecology, in regards to the regulation of discharges from Municipal Separate Storm Sewer Systems (MS4s), are municipal stormwater general permits.

Since the 1990s the NPDES Stormwater Program in the State of Washington has evolved into two phases of permit development, review and issuance, and coverage for MS4s. Phase I of the Municipal Stormwater Permit requires large and medium size municipalities, both incorporated cities with a population of over 100,000 people and unincorporated counties with populations of more than 250,000 people (based on the 1990 U.S. census), to obtain coverage, and develop and implement SWMPs. Likewise, Phase II of the Municipal Stormwater Permit applies to smaller municipalities with less than 100,000 in population size and unincorporated urban growth areas that are contiguous to permitted urbanized areas that are under the local jurisdictional control, whether it is a municipality or county (Primary Permittees). In February 2007, Ecology issued the first version of the EWA Phase II Municipal Stormwater Permit, requiring permittees to submit a Notice of Intent (NOI) seeking coverage and to comply with the terms of the permit. This permit also applies to MS4s operated by other types of public entities located in a Phase I or II city or county, such as ports, prison complexes, park districts, universities, and/or diking and drainage districts (Secondary Permittees).

Figure 1. SVID Campus Facilities. The campus consists of three areas:

1. Area One – Administration consisting of the Main Office, Maintenance Shop, Propane Filling Station, Carpentry Shop, and several outbuildings.
2. Area Two – West Pipe Yard with associated DR 3 manholes, one inside and one outside the boundary fence.
3. Area Three – Field Office and East Pipe Yard.

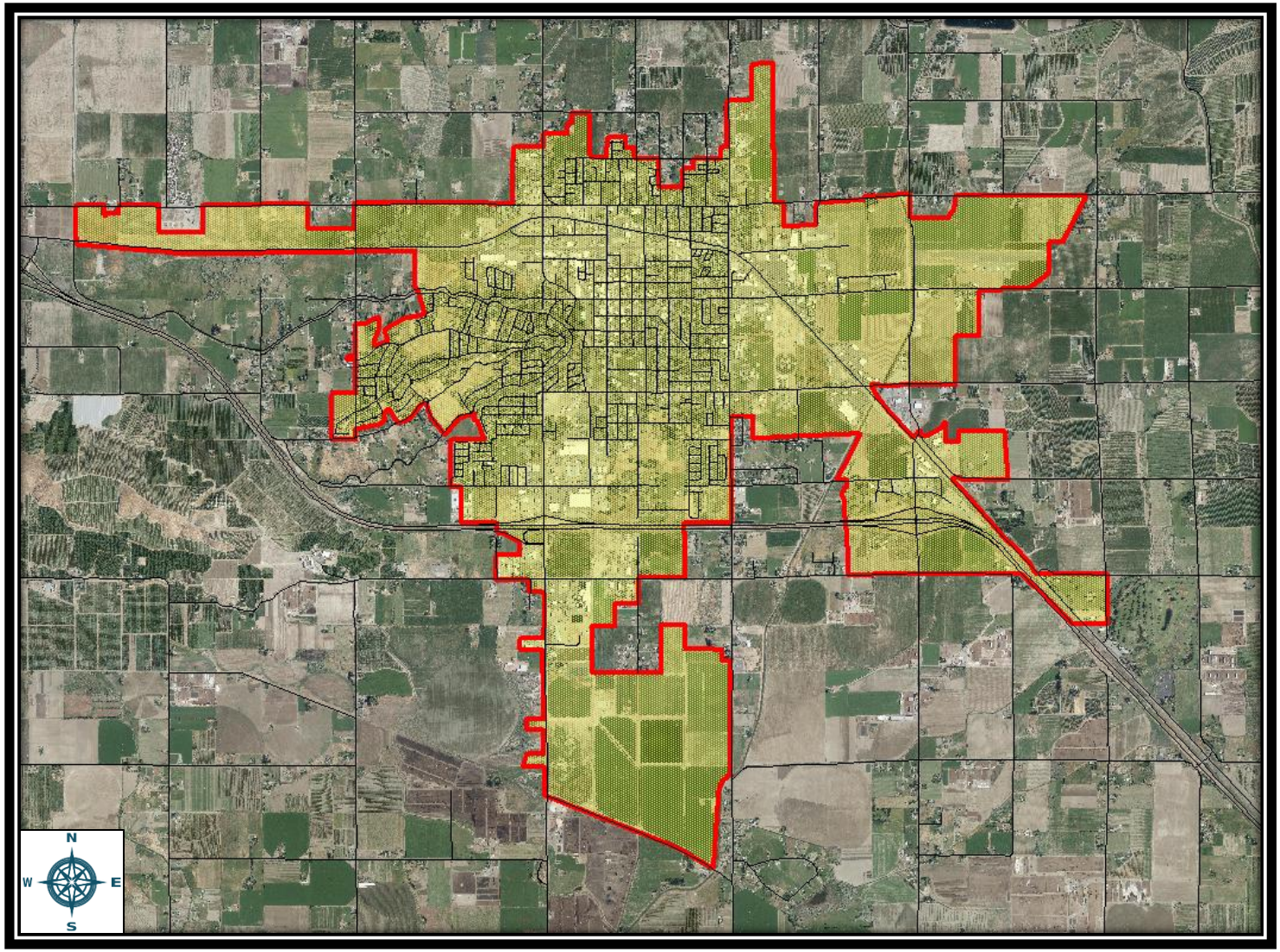

Figure 2. City of Sunnyside Geographic Area of MS4 Permit Coverage

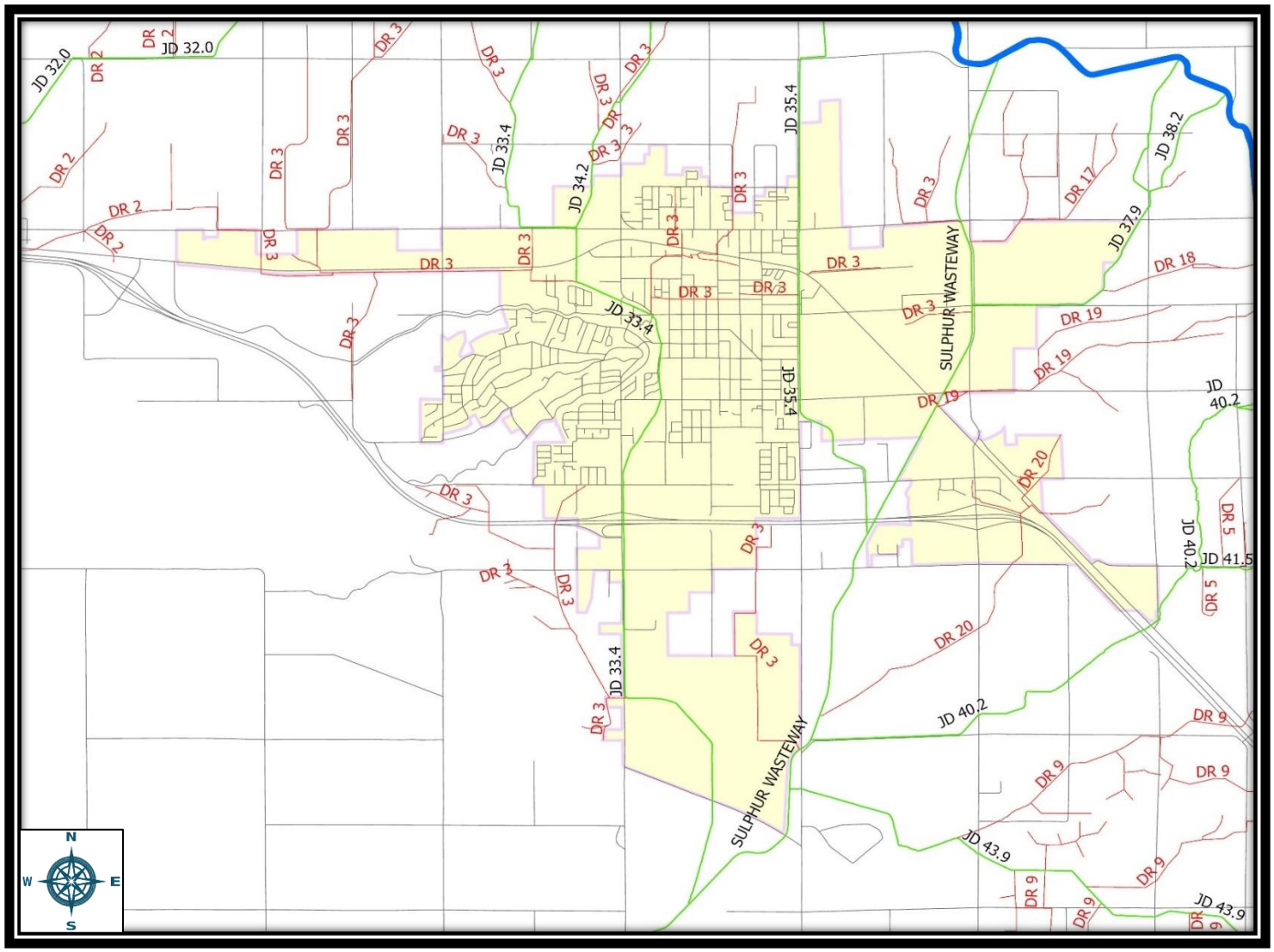

Figure 3. SVID Drains, Joint Drains, and Wasteways within the City of Sunnyside

SWMP Components: Program Elements and Performance Measures

Section two describes the six SWMP program elements for secondary permittees contained in the current municipal stormwater general permit:

2.1) S6.D.1 Public Education and Outreach
2.2) S6.D.2 Public Involvement and Participation
2.3) S6.D.3 Illicit Discharge Detection and Elimination
2.4) S6.D.4 Construction Site Stormwater Runoff Control
2.5) S6.D.5 Post-Construction Stormwater Management for New Development and Redevelopment
2.6) S6.D.6 Pollution Prevention and Good Housekeeping for Municipal Operations.

The program elements are organized consistent with the permit structural components in section S6 of the current ***Eastern Washington (EWA) Phase II Municipal Stormwater Permit*** for Secondary Permittees. The SWMP Plan will address the program elements above through the development, application, and use of performance measures. Each performance measure shall contain measurable activities that describe specific actions taken to implement the performance measure. A performance measure fact sheet example is provided below (Figure 4). The SWMP Plan shall include a description of program activities for the upcoming 2025 calendar year.

Additionally, after conducting a public review and comment period in the early Fall of 2023, Ecology recently reissued a new version of the EWA Phase II Municipal Stormwater Permit on July 1st, 2024 before the previous version expired on July 31st, 2024. The current permit went into effect on August 1st, 2024; therefore, this SWMP and each annual plan update will be maintained to meet any existing and new requirements for the next five years until the permit expiration date on July 31st, 2029.

PERFORMANCE MEASURE

Permit section, name of Performance Measure, implementation deadline

GOAL

Goal is defined as an anticipated outcome that guides the use of the performance measure.

EXISTING ACTIVITIES

This section describes existing activities associated with the performance measure. SVID may not be responsible for all activities (e.g. volunteer groups and countywide programs), but they affect the local community and represent stormwater management activities already underway by SVID. Additional actions implemented by the secondary permittee relating to S6.B. of the permit are described here.

MEASUREABLE ACTIVITIES

This section lists the quantifiable activities that describe how the performance measure will be accomplished. The measurable activities are actions describing what will be done to comply with the permit. Activities include such things as reviewing or developing a specific number and type of document or procedure, providing a specific number and type of training, etc.

ASSESSMENT

This section identifies documentation needed to assess performance measures as required by the permit.

ACCOMPLISHMENTS

This section will list measurable activities accomplished during the previous calendar year. A statement is provided if no activities were required during the previous calendar year.

Figure 4. Performance Measure Template

2.1) Public Education and Outreach

The Public Education and Outreach Program Element focuses primarily on educating SVID district employees or landowners/water users. The City of Sunnyside, as the primary permittee, will take the lead on public education of local residential homeowners and businesses within the city limits of Sunnyside concerning the potential impact of stormwater discharges on receiving waters. The receiving waters are defined as SVID drains, joint drains, and wasteways. The DR 3 drains discharge into joint drains JD 33.4 and JD 35.4, and Sulphur Wasteway. Then, both joint drains discharge into the Sulphur Wasteway which consequently discharges into the Yakima River at RM 61.0. SVID will provide resources on Best Management Practices (BMPs) for its employees and irrigators. SVID education for district employees and/or landowners, and local citizens should result in increased public acceptance and support of the City's stormwater management program.

Section S6.D.1 of the EWA Phase II Municipal Stormwater Permit requires that each Secondary Permittee shall implement the following stormwater education strategies:

a. Storm drain inlets owned or operated by the Secondary Permittee (Figure 1) that are located in maintenance yards, in parking lots, along sidewalks, and at pedestrian access points shall be clearly labeled with the message similar to "Dump no waste – Drains to waterbody".

   As identified during visual inspection and regular maintenance of storm drain inlets on the campus facility per the requirements of S6.D.3.d (pages 31 – 33 below) and S6.D.6.a.i (pages 52 – 55 below) in the EWA Phase II Municipal Stormwater Permit or as otherwise reported to the Secondary Permittee, any inlet having a label that is no longer clearly visible and/or easily readable shall be re-labeled within 90 days.

b. Each year beginning no later than three years from the date of permit coverage, public ports, colleges, and universities shall distribute educational information to tenants and residents on the impact of stormwater discharges on receiving waters, and steps that can be taken to reduce pollutants in stormwater runoff. This permit requirement is not applicable to SVID.

PERFORMANCE MEASURE

S6.D.1 Implement the 2025 Public Education and Outreach Plan

GOAL

S6.D.1.a. Define inlets and outlets of urban stormwater drainage on the SVID Campus Facilities and clearly label the storm drain inlets with a message similar to "Dump no waste – Drains to waterbody". Any inlet having a label that is no longer clearly visible and/or easily readable will be re-labeled within 90 days.

S6.D.1.b. Beginning each year no later than three years from the initial date of permit coverage, public ports, colleges, and universities shall distribute educational information to tenants and residents on the impact of stormwater discharges on receiving waters, and steps that can be taken to reduce pollutants in stormwater runoff. SVID is not a public port nor a college or university; therefore, this public education and outreach requirement does not apply. However, SVID will be supportive of the City of Sunnyside's and Yakima County's public education and outreach plans within their own SWMPs.

EXISITING ACTIVITIES

SVID located a total of twelve drainage inlets on the campus facilities, and identified nine out of the twelve which have the potential to collect precipitation and/or stormwater runoff. There are two storm manholes (one functions as a catch basin), five standard catch basins, one vehicle wash bay drain inlet, one infiltration catch basin, two floor drains (protected by building roofs), and one oil-water separator within the SVID Campus Facilities (Figure 1). The oil-water separator from the vehicle wash bay is cleaned by a licensed contract hauler who disposes of the waste in an environmentally responsible manner. All oil-water separator maintenance records are kept on file at SVID.

The drain inlets located in Area One of the SVID Campus Facilities, except for the two floor drains not exposed to precipitation and/or stormwater runoff, are piped to the City of Sunnyside sanitary sewer along E. Blaine Avenue. The SVID campus footprint identifies the inlet locations and SVID has the construction layout plans of Area One illustrating the stormwater outlet discharge points to the sanitary sewer. In Area Three, the storm drain inlet in front of the Field Office parking lot functions as a catch basin that has a solid lid cover while SVID determined that any stormwater runoff entering this catch basin is minimal and will undergo infiltration to the north underneath Yakima Valley Highway. Furthermore, the storm drain inlet outside the fence line on the west side of the East Pipe Yard functions as a catch basin which can drain some stormwater runoff overflow to the DR 3 manhole across S. 11th Street which is located outside the fence line on the east side of the West Pipe Yard (Area Two). The DR 3 manhole outside the fence line in Area Two has a solid lid cover type whereas the DR 3 manhole located inside the West Pipe Yard of the same area has a grate lid cover type, which allows it to function as a catch basin. Both of these existing DR 3 manholes in Area Two are clearly labeled, and the DR 3 manhole inside the West Pipe Yard will mostly allow precipitation and/or stormwater runoff to undergo infiltration, but can convey overflow to the west.

SVID Engineering Department maintains all SVID distribution (irrigation conveyance) and drainage system locations in both electronic GIS and hard copy map formats. In addition, the Yakima County GIS Department provides monthly services and data updates to SVID's GIS program files. Yakima County also provides mapping and data services for the City of Sunnyside.

MEASURABLE ACTIVITIES

SVID will continue monitoring the stormwater drainage and MS4 system features on its campus facilities. Any drain inlets that collect precipitation and/or stormwater runoff with a label no longer clearly visible and/or easily readable will be re-labeled within 90 days.

ASSESSMENT

1. Document and track all visual inspection forms and maintenance of stormwater drainage (i.e., MS4 system) within the SVID Campus Facilities during the 2025-2026 reporting year.

2. Re-label the stormwater drain inlets (manholes and catch basins) on the SVID Campus Facilities within 90 days using the district's customized stencils "Dump no waste – Drains to waterbody".

ACCOMPLISHMENTS

1. SVID re-labeled all stormwater drain inlets that were no longer clearly visible or easily readable on its campus facilities within 90 days during the 2024-2025 reporting year.

2. SVID will be researching other types of storm drain inlet labels, such as plastic or aluminum markers, which will last longer and not degrade as much compared to the spray paint stencil label types.

2.2) Public Involvement and Participation

The Public Involvement and Participation Program Element provides opportunities for the public to become involved in decisions related to reducing pollutants in stormwater. Through participation the public can provide valuable input and assistance to a regulated small MS4's stormwater management program, and be given opportunities to play an active role in both the development and implementation of the program. Increased public knowledge about how certain actions and choices affect stormwater and ultimately the water bodies of the Lower Yakima River Basin should result in increased public acceptance and support of the stormwater program. An active and involved community is meaningful to the success of a stormwater management program because it allows for the following:

- **Broader public support** since citizens actively engaged in the stormwater program development, implementation, and update process would be less likely to challenge the program since they have been included and had opportunities to provide their own input.

- **A broader base of expertise** and **economic benefits** since the community can be available and a valuable intellectual resource at no cost.

- **Conduit to other programs** as citizen volunteers can serve as liaisons who provide important cross-connections and relationships with other local community, regional, and government programs. This benefit is valuable when trying to implement a stormwater program on a watershed basis because it allows interested citizen groups, such as environmental/conservation organizations, to volunteer to take on specific tasks in dealing with best management practices (BMPs) and/or stormwater control measures to meet any number of MS4 permit conditions.

Nonetheless, the SVID Campus Facilities are a closed campus to the public, except for the Field Office parking lot in Area Three. Therefore, the public will not be involved in making stormwater management decisions related to construction and/or maintenance activities that could affect the MS4 system within the campus facilities; however, SVID welcomes public feedback or input about this SWMP.

Section S6.D.2 of the EWA Phase II NPDES Municipal Stormwater permit requires that each Secondary Permittee shall implement the following public involvement and participation strategies. Each year, no later than May 31, each Secondary Permittee shall:

a. Make the Annual Report available on SVID's website.

b. Make the latest updated version of the SWMP Plan available on SVID's website.

PERFORMANCE MEASURE

S6.D.2 Implement the 2025 Public Involvement and Participation Plan

GOAL(s)

S6.D.2.a. Make the 2024 Annual Report available to the public by posting the permit report submittal on the SVID website by May 31st, 2025.

S6.D.2.b. Make the latest updated version of the SWMP Plan available to district employees and/or public by posting the document on the SVID website by May 31st, 2025.

EXISITING ACTIVITIES

SVID annually updates its SWMP Plan and posts the current version to the Secondary Permittee's website: http://www.svid.org/ on the **Your District** drop down menu and under the **Water Quality** section, and also posted as a resource on the **Water Quality** webpage. A copy of the Annual Report will only be found as a resource on the **Water Quality** webpage.

MEASURABLE ACTIVITIES

1. SVID will post the completed 2024 Annual Report Submittal on its website by May 31st, 2025.

2. SVID shall post the latest updated version of the District's SWMP and 2025 Plan on its website by May 31st, 2025.

ASSESSMENT

SVID will assess any comments, feedback, and/or suggestions made by the community regarding the SWMP resources posted on the District's website. Additionally, SVID will provide timely responses to any public record requests.

ACCOMPLISHEMENTS

SVID received no SWMP comments from landowners in the district or the local community during the past 2024 calendar year.

SVID constructed and implemented a new, updated district website in June 2023. An individual **Water Quality** webpage was setup for convenient access to various water quality resources including the District's SWMP documents.

2.3) Illicit Discharge Detection and Elimination

One important issue related to stormwater management is the detection and elimination of illicit discharges. An "illicit discharge" means any discharge to a municipal separate storm sewer system (MS4) that is not composed entirely of stormwater or non-stormwater discharges as specified in S6.D.3.b of the EWA Phase II Municipal Stormwater Permit, also listed below in this section of the SVID SWMP. There are some exceptions to classifying a discharge as "illicit". These exceptions include discharges from NPDES-permitted sources and discharges from fire-fighting activities.

Illicit discharges are considered "illicit" because MS4s are not designed to accept, process, or discharge such non-stormwater waste (or stormwater pollutants). Types of stormwater pollutants associated with illicit discharges are listed below in Table 1. Illicit discharges can enter a MS4 system through either direct connections such as a wastewater pipe either mistakenly or deliberately connected to the storm drains, or indirect connections (e.g., infiltration into the MS4 from a damaged domestic wastewater line, hazardous material spills released into MS4 drain inlets, and/or paint or used oil washed directly into a MS4 system). Stormwater is different from domestic wastewater (or sanitary sewage) in which it does not flow to a treatment plant (i.e., POTW), but instead discharges to surface waters. Therefore, illicit discharges that end up in stormwater and are untreated can contribute an excessive amount of pollutants to receiving water bodies (e.g., SVID drains, joint drains, and/or wasteways within the City of Sunnyside). Stormwater pollutant levels from illicit discharges have been illustrated in numerous research studies around the United States to be high enough to significantly degrade receiving water quality and threaten aquatic ecosystems, wildlife, and human health.

Total Suspended Solids (TSS)
Organic, Inorganic, and Soluble Matter/Debris (leads to higher Turbidity)
Coliform Bacteria (*Fecal, E. coli*), Other Pathogens or Viruses
Nitrate + Nitrite (NO_3/NO_2)
Total Kjeldahl Nitrogen (TKN)
Ammonia (NH_3)
Total Phosphorus (TP), Organophosphates (OP)
Chlorine (Cl)
Copper (Cu)
Lead (Pb)
Zinc (Zn)
Total Organic Carbon (TOC)
Hydrocarbons, Fossil Fuels

Table 1. Stormwater Pollutants Associated with Illicit Discharges

The EWA Phase II Municipal Stormwater Permit requires secondary permittees to "detect and eliminate" non-stormwater discharges to the MS4 storm drain system. The only allowable non-stormwater discharges to the MS4 are listed below in this section of the SVID SWMP, which are in reference to S6.D.3.b.i and S6.D.3.b.ii of the EWA Phase II Municipal Stormwater Permit.

Section S6.D.3 of the EWA Phase II Municipal Stormwater Permit requires that each Secondary Permittee shall implement the following six (a-f below) illicit discharge detection and elimination strategies to its MS4. Each Secondary Permittee shall:

a. From the initial date of permit coverage, comply with all relevant ordinances, rules, and regulations of the local jurisdiction(s) in which the Secondary Permittee is located that govern non-stormwater discharges.

b. Implement appropriate policies prohibiting illicit discharges and an enforcement plan to ensure compliance with illicit discharge policies. There policies shall address, at a minimum: illicit connections; non-stormwater discharges, including spills, of hazardous materials; and improper disposal of pet waste and litter. Policies shall be revised, if necessary, to meet the requirements of this section no later than July 1st, 2027.

   i. *Allowable discharges.* The policies do not need to prohibit the following categories of non-stormwater discharges:

      • Diverted stream flows

      • Rising groundwaters

      • Uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005(b)(20))

      • Uncontaminated pumped groundwater

      • Foundation drains

      • Air conditioning condensation

      • Irrigation water from agricultural sources that is commingled with urban stormwater

      • Springs

      • Uncontaminated water from crawl space pumps

      • Footing drains

      • Flows from riparian habitats and wetlands.

      • Non-stormwater discharges authorized by another NPDES or SWD permit.

- Non-stormwater discharges from emergency firefighting activities in accordance with S2 - *Authorized Discharges*.

ii. *Conditionally allowable discharges*. The policies may allow the following categories of non-stormwater discharges only if the stated conditions are met and such discharges are allowed by local codes:

Category of Non-Stormwater Discharge	**SVID Campus Facilities Permit Condition**
Discharges from potable water sources, including but not limited to water line flushing, hyperchlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water.	Planned discharges shall be dechlorinated to a total residual chlorine concentration of 0.1 ppm or less, pH-adjusted if necessary, and volumetrically and velocity-controlled to prevent resuspension of sediments in the MS4.
Discharges from lawn watering and other irrigation runoff. These discharges shall be minimized through, at a minimum, public education activities and water conservation efforts conducted by the Secondary Permittee and/or the local jurisdiction.	The SVID Campus Facilities maintain proper lawn watering and uses water conservation efforts. The sprinklers are monitored and maintained for efficiency.
Dechlorinated swimming pool, spa, and hot tub discharges. The discharges shall be dechlorinated to a total residual chlorine concentration of 0.1 ppm or less, pH-adjusted and reoxygenated, if necessary, and volumetrically and velocity-controlled to prevent resuspension of sediments in the MS4. Discharges shall be thermally controlled to prevent an increase in temperature of the receiving water. Swimming pool cleaning wastewater and filter backwash shall not be discharged to the MS4.	SVID has no swimming pools or spas.
Street and sidewalk wash water and water used to control dust. The Secondary Permittee shall reduce these discharges through, at a minimum, public education activities and/or water conservation efforts conducted by the Secondary Permittee and/or the local jurisdiction. To avoid washing pollutants into the MS4, the Secondary	SVID shall reduce these discharges through education and/or water conservation efforts. To avoid washing pollutants into the MS4 system within the Campus Facilities, SVID will minimize the amount of street wash and dust control water used.

Permittee shall minimize the amount of street wash and dust control water used.	
Routine external building washdown that does not use detergents for buildings before 1950 and after 1980. These discharges shall be reduced through, at minimum, public education activities or water conservation efforts, or both. Structures confirmed or suspected to have PCB-building materials shall not discharge washdown to the MS4 system. Structures built between 1950-1980 and determined to be without PCB-containing materials may conduct routine building washdown (without detergents), as described above.	SVID shall reduce these discharges through water conservation efforts and will prevent any external building washdown (without detergents) from entering the MS4 system on its campus facilities.
Other non-stormwater discharges shall be in compliance with the requirements of a pollution prevention plan reviewed by the Permittee which addresses control of such discharges.	SVID is in compliance with the requirements of the SVID stormwater pollution prevention plan (SWPPP) for campus facility activities.

iii. The Secondary Permittee shall address any category of discharges in (i) or (ii) above if the discharge is identified as a significant source of pollutants to waters of the State.

c. Maintain a storm sewer system map showing the locations of all known storm drain outfalls and discharge points, labeling the receiving waters, other than groundwater, and delineating the areas contributing runoff to each outfall and discharge point. Make the map (or completed portions of the map) available upon request to Ecology and, to the extent appropriate, to other Permittees.

   i. No later than December 31st, 2026, the required format for mapping is an electronic format with fully described mapping standards.

   ii. No later than March 31st, 2027, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. This reporting shall include the size and material of the outfalls.

d. Conduct field inspections and visually inspect for illicit discharges at all known MS4 outfalls and discharge points. Visually inspect at least one third (on average) of all known outfalls and discharge points each year beginning no later than two years from the initial date of permit coverage. Implement procedures to identify and remove any illicit discharges. Keep records of inspections and follow-up activities.

e. Implement a spill response plan that includes coordination with a qualified spill responder.

f. No later than two years from the initial date of permit coverage, provide staff training or coordinate with existing training efforts to educate staff on proper best management practices for preventing illicit discharges. Train all Permittee staff who, as part of the normal job responsibilities, have a role in preventing such illicit discharges.

PERFORMANCE MEASURE

S6.D.3 Comply with all relevant ordinances, rules, and regulations of the City of Sunnyside concerning non-stormwater discharges

GOAL

S6.D.3.a. Act in accordance with all ordinances, rules, and regulations of the City of Sunnyside relevant to non-stormwater discharges.

EXISITING ACTIVITIES

SVID has complied with all relevant City of Sunnyside ordinances, rules, and regulations governing non-stormwater discharges.

SVID management will continue to pursue communication efforts with the City of Sunnyside Manager and/or Director of Public Works regarding stormwater issues. Also, the SVID Drains and Water Quality Supervisors occasionally communicate with the City of Sunnyside Wastewater and/or Stormwater Division Supervisors and their associated staff concerning stormwater, surface/subsurface water, and/or sewer issues. Since 2011 both public entities have worked together on resolving illicit connections and/or discharges to either agency's drainage system, and identifying manhole locations and drain lines where commingling of different water types occurs.

SVID has an electronic archival storage system and a Public Records Request Officer. Correspondence in the form of emails, letters, and/or voicemails with the City of Sunnyside are archived.

MEASURABLE ACTIVITIES

SVID will continue to follow all relevant ordinances, rules, and regulations concerning stormwater and non-stormwater discharges to the MS4 storm drain inlets on its campus facilities**.** SVID shall perform the following activities during the 2025-2026 reporting year:

1. Engage in meetings when necessary with the City of Sunnyside.

2. Track all changes made to the current protocol of the SVID SWMP and Annual Plan as necessary from the result of meeting outcomes with the City of Sunnyside.

3. Prior to construction of any structure, grading or improvements to the MS4 stormwater drainage system on the SVID campus facilities, SVID will submit any stormwater plans to the City of Sunnyside for approval, and in addition pay the necessary fees required to be issued a stormwater construction permit by the City.

ASSESSMENT

1. Assess any comments, feedback, and/or suggestions made by the City of Sunnyside regarding the content of the SVID's SWMP and Annual Plan, website, and/or stormwater construction plans.

ACCOMPLISHMENTS

During the past 2024 calendar year SVID did not received any comments from the City of Sunnyside, or the local community regarding the content of its SWMP and Annual Plan, or website. Currently, there are no stormwater construction plans in the development process for the SVID campus facilities [please refer to the last sentence of the *Introduction* section on Page 5 of this SVID SWMP].

PERFORMANCE MEASURE

S6.D.3 Continue Implementation of the District's Resolution and Enforcement Plan for Prohibiting Illicit Discharges

GOAL

S6.D.3.b. First, continue to implement the SVID policy resolution preventing illicit discharges and/or illegal dumping or disposal of waste into any property (e.g. drainage system) owned / operated by the district. Second, utilize the SVID enforcement plan when necessary to ensure compliance with the district's resolution prohibiting illicit discharges and/or improper disposal of waste into any of SVID's facilities.

EXISITING ACTIVITIES

A little over a decade ago SVID Management adopted a policy resolution to prevent illicit discharges; promote the proper management and disposal of toxic materials; implement education and outreach activities which shall inform public employees, businesses, and the public of hazards associated with illegal discharges and improper disposal of waste. The **resolution** titled RESOLUTION 2008-02-01 PREVENTION OF ILLICIT DISCHARGES was approved by SVID's Board of Directors and signed on February 5th, 2008. Then, this policy was recently amended and titled RESOLUTION 2022-05-01 PREVENTION OF ILLICIT DISCHARGES. It was approved by SVID's Board of Directors and signed on May 5th, 2022. The current policy resolution to prohibit and prevent illicit discharges states the following:

1. Non-stormwater discharges from SVID owned / operated property within the boundaries of the City of Sunnyside shall comply with all relevant ordinances, rules, and regulations of the City of Sunnyside.

2. SVID will administer the outfalls into SVID's drainage system and will delegate any regulatory responsibility to the City of Sunnyside for enforcement of both stormwater and illicit discharges that enter SVID's drainage system directly or via the City of Sunnyside's stormwater collection system.

3. SVID will in cooperation with the City of Sunnyside maintain and update a drainage system map showing the locations of all known City storm drain outfalls, labeling the receiving waters, and delineating the areas contributing runoff to each outfall. The map shall be available on request to Ecology and the City of Sunnyside. SVID will conduct field inspections and visually inspect for illicit discharges at all known outfalls that discharge to its drainage system. SVID will visually inspect at least one third (on average) of all known outfalls each year.

4. SVID will take appropriate steps to identify illicit discharges and take appropriate actions to remove any illicit discharges and keep records of inspections and follow-up activities. If illicit discharges are found to come from a City facility, SVID will delegate any investigation, inspection, regulatory, and follow-up responsibilities to the City for

compliance and enforcement.

Illicit connections are defined as any physical connection into an SVID piped or open facility waterways that do not have an SVID permit approved by the district's Engineering Department. Illegal dumping is defined as the intentional or inadvertent disposal of prohibited hazardous waste or materials into SVID's owned and operated facilities. SVID's Drains (DRs), Joint Drains (JDs), and Wasteways are some of the specific facility waterways that the district owns, operates, and maintains. The appropriate government agency will be contacted for enforcement as necessary when the source of the illicit connection and/or discharge is located. SVID's latest **enforcement plan** was updated on April 6th, 2023 and states the following:

1. SVID regularly patrols the drainage system. The drainage system is also routinely sampled for water quality during both the irrigation and non-irrigation season. If an illicit discharge is observed in the drainage system by sight, smell, or sampling, SVID investigates all known inflows to that point in the drainage system. If the illicit discharge cannot be located, a series of water samples is collected to isolate and detect the discharge.

2. Once the source is identified, the owner of the illicit discharge is notified and advised to immediately correct the problem.

3. If resistance is met in eliminating the illicit discharge and the likelihood of its reoccurrence, the appropriate enforcement authority is contacted to address the issue.

4. The City of Sunnyside is contacted if the discharge is from land use actions within the jurisdictional boundary of city limits.

5. The Yakima or Benton County Health Department is contacted if the discharge is from an *E. coli* human-origin source(s) outside the jurisdictional boundary of the City of Sunnyside.

6. The Washington Department of Ecology is contacted if the discharge is from a discharge from any other source(s) or exceeds State of Washington Water Quality Standards for primary contact recreation bacteria criteria in fresh water.

MEASURABLE ACTIVITIES

1. SVID will document the activities related to the District's Prevention of Illicit Discharges resolution, and the enforcement plan to ensure compliance with the District's policies concerning illicit discharges.

2. When necessary SVID will coordinate with and provide technical support to the City of Sunnyside to reduce and/or eliminate illicit discharges into SVID drains, joint drains, and wasteways (Figure 3) before entering and within the jurisdictional boundary of the incorporated city. The technical support includes analysis of the City of Sunnyside's sampling data, verification of connections or relationships between SVID's drainage

system and the City's system(s), peer sampling events if needed, and SVID water quality sampling to eliminate illicit sources from creating high bacteria counts before they enter the city limits.

3. SVID shall address any illicit discharges into its owned / operated drainage system districtwide. This will also include addressing any category of discharges in (i) or (ii) on pages 20-22 above if the discharge is identified as a significant source of pollutants that would result in a violation of a Water Quality Standard for Surface Waters of the State of Washington.

4. SVID will update the information listed on its illicit discharge enforcement plan for clarification purposes, and to coordinate with updated criteria established in the latest certified version of the Water Quality Standards for Surface Waters of the State of Washington.

ASSESSMENT

1. Maintain records of communication and activities related to illicit discharge detections and eliminations districtwide.

2. If needed, amend the current resolution and/or enforcement plan regarding the prevention of illicit discharges districtwide, or adopt an additional policy if new information becomes available and requires a SVID Board resolution.

ACCOMPLISHMENTS

During the past 2024 calendar year the Water Quality Staff, as directed by SVID management, has been performing extensive bacteria (i.e., *E. coli and Fecal coliform*) sampling and analytical testing of DR 3 and JD 33.4 return flow at several locations above and below the city limits of Sunnyside. The lab result data reports are kept on file by the district, and are intended to provide a resource for tracking the effectiveness of any stormwater or sewer inspection, and/or maintenance work performed by the City's Wastewater Division. In addition, the DR 3 and JD 33.4 sampling and testing allows SVID to monitor any elevated bacteria concentration levels that could be directly related to any identifiable, illicit sources of contamination into SVID's drains and joint drains near and within the city limits. SVID believes this data collection and sharing will continue to maintain collaboration efforts with the City of Sunnyside in supporting the prevention of illicit connections and/or discharges to SVID's drainage system.

PERFORMANCE MEASURE

S6.D.3 Maintain and/or update the district's electronic stormwater MS4 map

GOAL

S6.D.3.c. Maintain a storm sewer system map showing the locations of all known storm drain outfalls and discharge points, labeling the receiving waters, other than groundwater, and delineating the areas contributing runoff to each outfall and discharge point. Make the map (or completed portions of the map) available on request to Ecology and, to the extent appropriate, to other Permittees. The required format for mapping is an electronic format with fully described mapping standards. Also, submit locations of all known MS4 outfalls on SVID Campus Facilities, including the size and material, with each Annual Report.

EXISITING ACTIVITIES

SVID is in the continual process of updating its districtwide distribution and drainage maps through field-verified locates. The distribution maps consist of the district's canal, laterals, and deliveries system whereas the drainage maps illustrate the district's drains, joint drains, and wasteways. There are also maps with both layers of the distribution and drainage systems. Districtwide locates are conducted to determine where SVID lines and manholes are in relationship to other public or private utility lines. Also, SVID engineers survey all construction projects and adds this data information to the district's AutoCAD databases. Meanwhile, the Water Quality Department provides map feature updates to the Engineering Department regarding the MS4 system within the campus facilities. Historical maps of the MS4 system on the campus facilities will be kept and archived.

SVID has had Geographical Information System (GIS) capabilities since the early 2000s. The districts' land parcels and irrigation layer theme maps are updated monthly by Yakima County GIS personnel. There are multiple SVID mapping layer themes available showcasing where the irrigation district's facilities are approximately located. Any new knowledge obtained regarding the location and vicinity of SVID's owned / operated facilities and/or property is modified by the Engineering Department. SVID acknowledges that the vicinity GIS map locations of the drains, joint drains, manholes, and district campus stormwater drain inlets are for visual reference only and that accuracy of physical locations is not guaranteed.

MEASURABLE ACTIVITIES

1. SVID will continue to update its GIS and AutoCAD database files as needed. The Water Quality Department will provide map feature updates of the MS4 system on the campus facilities as needed to the Engineering Department.

2. The district shall perform field data measurements when engineering surveys and/or irrigation facility locates are requested.

3. SVID shall make the MS4 drainage system map (or completed portions of the maps

available) to Department of Ecology upon request and, to the extent appropriate, to the City of Sunnyside.

4. SVID will compile the information on the size and material of each MS4 outfall on its campus facilities and submit this information with each annual report no later than March 31st, 2027.

ASSESSMENT

1. Monitor the list of changes made to the SVID drainage system layer theme GIS maps.

2. Retain historical maps of the districtwide drainage system, and MS4 system within SVID Campus Facilities.

3. Update size and material information of MS4 outfalls on SVID Campus Facilities as necessary whenever major construction changes occur to the MS4 system.

ACCOMPLISHMENTS

GIS layer theme maps are continuously updated as new MS4 locations are installed or existing MS4 system components are modified within the district campus facilities, and/or current or new drainage facility locations districtwide are modified.

During the 2021 calendar year the district's Water Quality Department completed the process of compiling and analyzing into one datafile all historical and recent sampling events, field records, and monitoring data at DR 3 locations within the northern section of the City of Sunnyside limits, which also included GIS generated site-specific maps. This project was intended to provide technical support to the City of Sunnyside and Department of Ecology by identifying bacterial sources (i.e., *E. coli and Fecal coliform*), and verifying connections or relationships between SVID's irrigation return flow drainage system and the City's MS4 system. When time permits in 2025, additional data analysis will occur with historical and recently sampled DR 3 locations near and outside the southwest section of the City of Sunnyside limits.

SVID updated the map features (Figure 3) of its drains, joint drains, and wasteways within the City of Sunnyside this past 2024 calendar year.

PERFORMANCE MEASURE

S6.D.3 Conduct field inspections for illicit discharges into the regulated MS4

GOAL

S6.D.3.d. Conduct field inspections and visually inspect for illicit discharges at all known MS4 outfalls and discharge points within the SVID Campus Facilities. Visually inspect at least one third (on average) of all known outfalls and discharge points each year beginning no later than two years from the initial date of permit coverage. Implement procedures to identify and remove any illicit discharges. Keep records of inspections and follow-up activities.

EXISITING ACTIVITIES

1. The SVID water quality staff routinely inspects all identified MS4 storm drain inlets for illicit discharges on the SVID Campus Facilities (Figure 1) at least one third (on average) each year, if not more than what is required by the permit. Monitoring of the campus facilities MS4 storm drain inlets is prioritized especially during and after a major storm event within the area of Sunnyside. The field inspection information (i.e., weather and MS4 conditions) are recorded on an Illicit Discharge Detection and Elimination (IDDE) stormwater inspection form.

2. SVID continues to implement the District's Resolution and Enforcement Plan for Prohibiting Illicit Discharges when necessary if an illicit connection and/or discharge is detected into a drain, joint drain, or wasteways owned / operated by SVID districtwide. The resolution and enforcement plan are detailed above on pages 26-27 of this SVID SWMP and 2025 Plan. All field inspection and sampling information are recorded on surface ditch and manhole field data sheets.

3. The SVID Drains crew throughout each year routinely patrols and inspects districtwide all drains, joint drains, and wasteways for illicit discharges and illegal dumping.

4. Districtwide landowner reporting or notifications are received and addressed in a timely manner, as well as the appropriate staff (i.e., supervisor or assistant manager) being sent out to the area of concern to investigate and potentially resolve the issue. If no compromise is reached, then the appropriate regulatory authorities will be notified as stated in the district's resolution and enforcement plan for prevention of illicit discharges.

5. SVID currently has operating and maintenance procedures in place to remove illicit discharges when detected such as:

    - illicit connections or pipes tapped (without SVID permit authorization) into a district owned / operated drain, joint drain, and/or wasteway.

    - illegal dumping of hazardous materials and/or waste.

- organic debris, abandoned vehicles, appliances, etc.

MEASURABLE ACTIVITIES

1. SVID will visually inspect at least one third (on average) of all known outfalls and discharge points on the campus facilities each year beginning no later than two years from the initial date of permit coverage. SVID will continue to document all field inspections of the MS4 system on the campus facilities using an Illicit Discharge Detection and Elimination (IDDE) Inspection Form including the conditions of weather and the storm drain inlets. All MS4 inspection and maintenance records, and follow-up activities will be archived and readily available for public record requests.

2. The district shall document communications, investigative responses and efforts, and information in regards to reported illicit discharges or concerns within district boundary limits made by the public or another agency.

3. SVID will continue to coordinate efforts and provide technical support to the City of Sunnyside when conducting fieldwork, and/or exchanging information when necessary that is related to activities for preventing illicit discharges within city limits.

ASSESSMENT

1. Document all records of inspections and follow-up activities related to illicit discharge detections and eliminations into SVID owned / operated drains, joint drains, and wasteways districtwide.

2. Inspection forms, emails, letters, laboratory test results of collected water samples, and reports of illicit discharge elimination activities are archived and kept on site at the district for future reference or review by authorized personnel.

ACCOMPLISHMENTS

The City of Sunnyside and SVID have been working together diligently to identify and remove illicit bacteria sources (i.e., *E. coli and Fecal* coliform) from SVID's drainage system within city limits. Since 2016 both agencies have invited one another to attend field inspections (i.e., camera inspections, smoke tests, and/or water quality sampling) of their storm, sewer, and/or irrigation return flow drain lines to locate any defects within the different systems. This is still an ongoing and time-consuming process that will presumably improve the removal efficiency of illicit connections and/or discharges to SVID's drainage system within city limits.

During the past 2024 calendar year the Water Quality Staff, as directed by SVID management, has been performing extensive bacteria (i.e., *E. coli and Fecal coliform*) sampling and analytical testing of DR 3 and JD 33.4 return flow at several locations above and below the city limits of Sunnyside. The lab result data reports are kept on file by the district, and are intended to provide a resource for tracking the effectiveness of any stormwater or sewer inspection, and/or maintenance work performed by the City's Wastewater Division. In addition, the DR 3 and JD

33.4 sampling and testing allows SVID to monitor any elevated bacteria concentration levels that could be directly related to any identifiable, illicit sources of contamination into SVID's drains and joint drains near and within the city limits. SVID believes this data collection and sharing will continue to maintain collaboration efforts with the City of Sunnyside in supporting the elimination and prevention of illicit connections and/or discharges to SVID's drainage system.

PERFORMANCE MEASURE

S6.D.3 Continue to implement the district's Spill Response Plan

GOAL

S6.D.3.e. Implement a spill response plan that includes coordination with a qualified spill responder.

EXISITING ACTIVITIES

1. SVID has a spill prevention, guidance, and response plan in place districtwide as well as for the campus facilities which includes an emergency response checklist for any spills or unplanned discharges. The SVID Campus Facilities includes the Administration Office and fenced storage and/or Maintenance Shop yards (Area One), the Field Office and fenced East Pipe Yard (Area Three), and a fenced West Pipe Storage yard (Area Two). Figure 1 illustrates the stormwater drain inlet locations within the SVID Campus Facilities.

2. All SVID field employees and supervisors, except for Engineering staff, have a public operator pesticide license with a Laws and Safety Category Endorsement, and are qualified to respond to herbicide and/or other chemical spills. A Public Operator licensee is trained and certified as a spill responder when they obtain a license after passing the Laws and Safety Exam.

3. SVID consults annually with the City of Sunnyside Fire Department and has provided firefighters with a map of the SVID Campus Facilities. The Fire Department has on record the locations and types of hazardous materials stored on the SVID Campus Facilities.

4. The Health & Safety Director at the district has modeled a spill response based on Washington State Department of Agriculture - pesticide applicator Laws and Safety guidelines, and Washington State Department of Ecology Spill Reporting and Cleanup guidelines.

MEASURABLE ACTIVITIES

1. SVID staff will be the first responders when notified and/or detection occurs of any hazardous chemical or oil spills into districtwide project waterways, and/or the MS4 system on the campus facilities. If staff are unable to respond, the appropriate emergency response agency (i.e., local, county, state, and/or federal) will be contacted. The district's spill response plan will be implemented whenever an emergency spill situation arises.

2. All spill prevention guidance documents, and the district's spill response plan will be reviewed each year and updated as necessary.

ASSESSMENT

1. A record of staff responding to spills will be documented and maintained.

2. All spill prevention guidance and response documents will be tracked, updated, and kept on file at the district office(s).

ACCOMPLISHMENTS

SVID reviewed and updated some of the information (emergency contact numbers, staff personnel changes, etc.) on its districtwide spill response plans and guidance documents this past 2024 calendar year.

PERFORMANCE MEASURE

S6.D.3 Provide staff training to prevent spills and discharges

GOAL

S6.D.3.f. No later than two years form the initial date of permit coverage, provide staff training or coordinate with existing training efforts to educate staff on proper best management practices (BMPs) for preventing illicit discharges. Train all Permittee staff who, as part of their normal job responsibilities, have a role in preventing such illicit discharges.

EXISITING ACTIVITIES

1. SVID has a Health & Safety (H&S) Director on staff. The H&S Director addresses spill response guidelines at safety committee meetings along with other pertinent safety information regarding the usage, hazards, and storage of chemicals by district employees. The H&S Director sets the agenda and supplies information for staff training meetings throughout each calendar year. Signed safety attendance sheets along with the prepared information of the safety topic are filed electronically for documentation. Additional training sessions include:

    a. Annual All SVID staff safety meeting, held each December.

    b. Annual Ditchriders meeting, held each March.

    c. Annual Public Operator Pesticide License Recertification Course (i.e., Spray Class), held each February. During the district's eight-hour public operator recertification course, spill response information and training are provided for all employees who are required to attend.

    d. Annual aquatic herbicide application and safety handling protocols for treatment crews, usually during the Public Operator Pesticide License Recertification Course.

    e. Monthly Safety Committee meetings which have both union and non-union representation.

    f. Each department supervisor holds weekly staff safety meetings with their crew members. The Health & Safety Director supplies the safety topic and information for the meeting.

MEASURABLE ACTIVITIES

1. SVID will document and archive all safety meetings, signed attendance sheets, and completed staff training activities involving the prevention of spills and illicit discharges.

2. The district will make an effort to incorporate more educational material about how spills

can have an impact on stormwater pollution runoff for the employees within safety meetings and training activities.

3. SVID will continue to require district staff to act as qualified spill responders by maintaining their public operator license(s) and attending the Pesticide License Recertification Course annually which includes spill response topics.

ASSESSMENT

1. Document and archive electronically each training event with signature sheets for attendance.

2. Maintain monthly and annual safety meetings for each of the district departments.

3. Monitor changes made to staff training efforts for addressing spill incidents and prevention of illicit discharges into districtwide project waterways.

ACCOMPLISHMENTS

The district had to postpone its annual Public Operator Pesticide Recertification Course (eight hours in duration) later in the year, where currently it is scheduled to take place on October 28th, 2025. Some information within several of the course topics will cover spill prevention and response guidance.

2.4) Construction Site Stormwater Runoff Control

Stormwater runoff from construction sites can be a significant source of pollution that impacts water flowing to an MS4 and ultimately discharged into a natural receiving body of water such as rivers and streams. Of the pollutants listed in Table 2 on the right, sediment is usually the main pollutant of concern from construction site runoff. Not implementing adequate erosion and sediment control measures from construction sites can be a significant source of pollutants for MS4s. The contribution of excessive sediment loading to MS4s from construction site stormwater runoff can result in negative impacts to water quality and aquatic habitats in receiving natural bodies of water.

Sediment
Solid and sanitary wastes
Phosphorus (fertilizer)
Nitrogen (fertilizer)
Pesticides
Oil and grease
Concrete truck washout
Construction chemicals
Construction debris

Table 2. Pollutants Commonly Discharged from Construction Sites

Section S6.D.4 of the EWA Phase II Municipal Stormwater Permit requires that each Secondary Permittee shall implement the following construction site stormwater runoff measures. From the initial date of permit coverage, each Secondary Permittee shall:

a. Comply with all relevant ordinances, rules, and regulations of the local jurisdiction(s) in which the Secondary Permittee is located that govern construction phase stormwater pollution prevention measures.

b. Ensure that all construction projects under the functional control of the Secondary Permittee which require a construction stormwater permit obtain coverage under the *Construction Stormwater General Permit*, or an individual NPDES permit, prior to discharging construction related stormwater.

c. Coordinate with the local jurisdiction regarding projects owned or operated by other entities which discharge into the Secondary Permittee's MS4, to assist the local jurisdiction with achieving compliance with all relevant ordinances, rules, and regulations of the local jurisdiction(s).

d. Provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control BMPs and requirements or hire trained contractors to perform the work.

e. Coordinate, as requested, with Ecology or the local jurisdiction to provide access for inspection of construction sites or other land disturbances which are under the functional control of the Secondary Permittee during the land disturbing activities and/or construction period.

PERFORMANCE MEASURE

S6.D.4 Comply with all ordinances, rules, and regulations of the City of Sunnyside

GOAL

S6.D.4.a. Comply with all relevant ordinances, rules, and regulations of the local jurisdiction(s) in which SVID's MS4 is located that govern construction phase stormwater pollution prevention measures.

EXISITING ACTIVITIES

SVID has been complying with all relevant ordinances, rules, and regulations by the state and local jurisdiction(s) controlling construction site stormwater runoff into the district's MS4 within the campus facilities.

MEASURABLE ACTIVITIES

SVID will follow and comply with all established local ordinances and rules adopted and/or amended by the City of Sunnyside that pertain to construction stormwater requirements. SVID will abide by signed contracts, policies, and/or all ordinances pertaining to construction site stormwater runoff control.

ASSESSMENT

1. Document emails and letters with the City of Sunnyside through electronic archive.

2. Monitor any new and current adopted or amended construction stormwater ordinances and/or rules required by the City of Sunnyside.

ACCOMPLISHMENTS

During the past 2024 calendar year SVID did not received any comments from the City of Sunnyside, or the local community regarding the content of its SWMP or website. Currently, there are no stormwater construction plans in the development process for the SVID campus facilities [please refer to the last sentence of the *Introduction* section on Page 5 of this SVID SWMP].

PERFORMANCE MEASURE

S6.D.4 Obtain coverage under a NPDES General Permit if required

GOAL

S6.D.4.b. Ensure that all construction projects under the functional control of SVID which require a construction stormwater permit obtain coverage under the *Construction Stormwater General Permit*, or an alternative individual NPDES permit, prior to discharging construction related stormwater.

EXISITING ACTIVITIES

1. All SVID construction within the City limits of Sunnyside currently requires all staff and outside contractors to comply with all relevant local, state, and federal requirements pertaining to construction site stormwater runoff control.

2. SVID uses state and/or federal standards for construction stormwater projects within the SVID campus facilities.

3. All projects are tracked and documented on the Master Work Schedule. This schedule has a check point for all relevant permits that need to be obtained before the project(s) begin.

MEASURABLE ACTIVITIES

1. SVID Engineering Department will review all projects related to the MS4 system on its campus facilities to determine those that need coverage under the *NPDES and SWD Construction Stormwater General Permit*.

2. SVID Engineering Department construction bids and contracts will require that all hired contractors comply with local, county, state, and federal laws and regulations.

ASSESSMENT

1. Document each project reviewed as illustrated on the SVID Master Work Schedule. This schedule is tracked, updated, and archived annually.

ACCOMPLISHMENTS

Currently, there are no stormwater construction plans in the development process for the district's MS4 system within the campus facilities.

Furthermore, when required the SVID Engineering Department maintains coverage under the *NPDES and SWD Construction Stormwater General Permit*, related to specific construction projects districtwide.

PERFORMANCE MEASURE

S6.D.4 Coordinate with the City of Sunnyside to achieve compliance

GOAL

S6.D.4.c. SVID will coordinate with the local jurisdiction, the City of Sunnyside, regarding projects owned or operated by other entities which discharge into SVID's drains, joint drains, and wasteways before entering the city limits to assist the local jurisdiction with achieving compliance with all relevant ordinances, rules, and regulations of the local jurisdiction(s) that pertain to the City's stormwater management.

EXISITING ACTIVITIES

All SVID construction within the boundary limits of the City of Sunnyside currently require all staff and outside entities to comply with all relevant local, state, and federal requirements.

MEASURABLE ACTIVITIES

SVID will work and make efforts to communicate with the City of Sunnyside if necessary concerning MS4 construction site projects within the campus facilities.

ASSESSMENT

1. Archive all sampling and monitoring data, reports, maps, and/or MS4 construction plans sent to the City of Sunnyside and to Ecology as requested and when required.

ACCOMPLISHMENTS

During the past 2024 calendar year the Water Quality Staff, as directed by SVID management, has been performing extensive bacteria (i.e., *E. coli and Fecal coliform*) sampling and analytical testing of DR 3 and JD 33.4 return flow at several locations above and below the city limits of Sunnyside. The lab result data reports are kept on file by the district, and are intended to provide a resource for tracking the effectiveness of any stormwater or sewer inspection, and/or maintenance work performed by the City's Wastewater Division. In addition, the DR 3 and JD 33.4 sampling and testing allows SVID to monitor any elevated bacteria concentration levels that could be directly related to any identifiable, illicit sources of contamination into SVID's drains and joint drains near and within the city limits. SVID believes this data sharing will continue to support collaboration efforts with the City of Sunnyside in supporting the elimination and prevention of illicit connections and/or discharges to SVID's drainage system.

PERFORMANCE MEASURE

S6.D.4 Educate relevant staff in erosion and sediment control

GOAL

S6.D.4.d. SVID will provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control BMPs and requirements, or hire skilled contractors to perform the work.

EXISITING ACTIVITIES

All SVID construction within the boundaries of the City of Sunnyside currently require all staff and outside entities to comply with all relevant local, state, and federal requirements.

SVID has a Health & Safety Director on staff. The H&S Director and/or appropriate department supervisors addresses erosion and sediment control topics at safety meetings along with other pertinent safety information. The H&S Director sets the agenda or supplies information for staff training meetings throughout each calendar year. Signed safety attendance sheets along with the prepared safety information are archived electronically for documentation. Additional training sessions include:

a. Annual All SVID staff safety meeting, held each December.

b. Annual Ditchriders meeting, held each March.

c. Annual Public Operator Pesticide License Recertification Course (i.e., Spray Class), held each February.

d. Annual aquatic herbicide application and safety handling protocols for treatment crews, usually during the Public Operator Pesticide License Recertification Course.

e. Monthly Safety Committee meetings which have both union and non-union representation.

f. Each department supervisor holds weekly staff safety meetings with their crew members. The Health & Safety Director supplies the safety topic and information for the meeting.

The SVID Assistant Manager – Operations manages the Upper and Lower Division Supervisors, the Drains Supervisor, and the Water Quality Supervisor. These Supervisors train, coordinate, and monitor their staff in the best management practices for construction in irrigation canals, laterals, and drains for erosion and sediment control. The current field or laborer staff level at the district is 51 union members.

Also, some district employees in the SVID Engineering Department are Certified Erosion & Sediment Control Leads (CESCL) and maintain their certifications related to the *NPDES and SWD Construction Stormwater General Permit* requirements. When necessary, erosion and sediment control guidance and/or education are provided to field staff on specific construction sites districtwide.

MEASURABLE ACTIVITIES

1. The district will electronically archive all safety meetings and signed attendance sheets.

2. SVID will make efforts to incorporate more erosion and sediment control information and training for its employees within the safety meetings.

3. When required some SVID Engineering Department staff members will obtain and maintain their CESCL certifications.

ASSESSMENT

1. Document each training class and safety meeting, along with employee attendance.

2. Ensure CESCL certified district employees are available for specific construction stormwater site reviews and guidance.

ACCOMPLISHMENTS

All district field or laborer staff attended a trenching and shoring workshop course on June 20th, 2024; and an excavation, trenching, and shoring safety course on September 25th, 2024. Some of the topics and information provided in the training course included erosion and sediment control and/or safety awareness.

PERFORMANCE MEASURE

S6.D.4 Coordinate access for inspection as requested

GOAL

S6.D.4.e. Coordinate, as requested, with Ecology and/or the City of Sunnyside to provide access for inspection of construction sites or other land disturbances, which are under SVID's functional control during the land disturbing activities and/or construction period.

EXISITING ACTIVITIES

SVID will coordinate access for requesting authorized agencies. Currently, there are no stormwater construction plans in the development process for the district's MS4 system within the campus facilities.

MEASURABLE ACTIVITIES

SVID Management, Engineering, and/or Water Quality shall coordinate access, and will document the request and access trip.

ASSESSMENT

1. Document each project reviewed as illustrated on the Master Work Schedule.

2. Document any coordinated on-site visits by the City of Sunnyside and/or Ecology.

ACCOMPLISHMENTS

During this past 2024 calendar year, no construction site projects and/or land disturbing activities occurred near or around the district's MS4 system within the campus facilities.

2.5) Post-Construction Stormwater Management for New Development and Redevelopment

Many studies have indicated that post-construction stormwater runoff from areas undergoing new development or redevelopment has had adverse effects on receiving waterbodies. Therefore, post-construction stormwater quality management for new development and redevelopment is necessary to enhance the minimization of pollutants collected by post-construction stormwater discharges, which can improve water quality within an MS4 system.

Generally, there are two forms of substantial impacts of post-construction runoff. The first form being the increase in the type and quantity of pollutants in stormwater runoff. Some examples are listed in Table 2 above. The reason for this first form of impact would be due to runoff flow increase over areas altered by construction development. The second form of impact from post-construction runoff occurs by increasing the quantity of water delivered to the receiving waterbodies during and shortly after storm events. This impact is caused by increased impervious surfaces (e.g., parking lots, driveways, and/or building rooftops) which interrupt the natural cycle of gradual infiltration, percolation, and seepage of water through vegetation and soil. New development and redevelopment will create more impervious surfaces, if post-construction stormwater management strategies are not implemented, where larger volumes of runoff will drain to a MS4 then quickly flow to the nearest receiving body of water.

Section S6.D.5 of the EWA Phase II Municipal Stormwater Permit requires that each Secondary Permittee shall implement the following post-construction stormwater management measures for new development and redevelopment. From the initial date of permit coverage, each Secondary Permittee shall:

a. Comply with all relevant ordinances, rules, and regulations of the local jurisdiction(s) in which the Secondary Permittee is located that govern post-construction stormwater pollution prevention measures.

b. Coordinate with the local jurisdiction regarding projects owned or operated by other entities which discharge into the Secondary Permittee's MS4, to assist the local jurisdiction with achieving compliance with all relevant ordinances, rules, and regulations of the local jurisdiction(s).

PERFORMANCE MEASURE

S6.D.5 Comply with all relevant post-construction ordinances, rules, and regulations of the City of Sunnyside

GOAL

S6.D.5.a. Comply with all relevant ordinances, rules, and regulations of the local jurisdiction(s) that govern post-construction stormwater pollution prevention measures.

EXISITING ACTIVITIES

As a quasi-governmental service entity, SVID is abiding by all relevant post-construction ordinances, rules, and regulations of the City of Sunnyside. All SVID permits and/or construction contracts issued by the Engineering Department require all entities to be in compliance with all relevant local, state, and federal standards and permit requirements.

MEASURABLE ACTIVITIES

1. SVID will document letters and emails with the City of Sunnyside concerning all aspects of post-construction work within the district's campus facilities.

2. All SVID construction bids and contracts shall be documented and tracked by the Engineering Department.

ASSESSMENT

1. Document each project reviewed and listed on the Master Work Schedule. The Master Schedule is tracked and archived annually.

ACCOMPLISHMENTS

During this past 2024 calendar year, no construction site projects and/or land disturbing activities occurred near or around the district's MS4 within the campus facilities.

PERFORMANCE MEASURE

S6.D.5 Coordinate with the City of Sunnyside regarding projects which discharge into SVID's MS4 and assist the local jurisdiction with achieving compliance with all relevant ordinances, rules, and regulations

GOAL

S6.D.5.b. Coordinate with the local jurisdiction regarding projects owned or operated by other entities which discharge into SVID's MS4 within the campus facilities, to assist the local jurisdiction with achieving compliance with all relevant ordinances, rules, and regulations of the local jurisdiction(s).

EXISITING ACTIVITIES

SVID is coordinating efforts with the City of Sunnyside to achieve compliance with all relevant ordinances, rules, and regulations concerning water quality issues. Currently, there are no outside entities discharging into any segment or portion of the MS4 system located within the SVID Campus Facilities. This has been confirmed throughout the 2024-2025 reporting year by routine inspection of the MS4 system within the SVID Campus Facilities, during and shortly after a storm event as well during dry conditions, by the Water Quality Department.

MEASURABLE ACTIVITIES

1. SVID will communicate and work together with the City of Sunnyside to achieve compliance concerning MS4 construction site projects within the campus facilities.

2. SVID will eliminate any detectable illicit discharges or connections to its MS4 system on the campus facilities in order to assist the City of Sunnyside in achieving compliance with permit requirements.

ASSESSMENT

1. Archive all sampling and monitoring data, reports, and maps sent to the City of Sunnyside and to Ecology as requested.

2. SVID will document letters and emails with the City of Sunnyside concerning all aspects of work related to achieving compliance with the EWA Phase II Municipal Stormwater Permit.

ACCOMPLISHEMNTS

During this past 2024 calendar year, no other outside entities, except for the City of Sunnyside, were identified as discharging into SVID's MS4 system within the campus facilities.

The City of Sunnyside and SVID have been working together diligently to identify and remove illicit bacteria sources (i.e., *E. coli and Fecal* coliform) from SVID's drainage system within city limits. Since 2016 both agencies have invited one another to attend field inspections (i.e., camera inspections, smoke tests, and/or water quality sampling) of their storm, sewer, and/or irrigation return flow drain lines to locate any defects within the different systems. This is still an ongoing and time-consuming process that will presumably improve the removal efficiency of illicit connections and/or discharges to SVID's drainage system within city limits.

During the past 2024 calendar year the Water Quality Staff, as directed by SVID management, has been performing extensive bacteria (i.e., *E. coli and Fecal coliform*) sampling and analytical testing of DR 3 and JD 33.4 return flow at several locations above and below the city limits of Sunnyside. The lab result data reports are kept on file by the district, and are intended to provide a resource for tracking the effectiveness of any stormwater or sewer inspection, and/or maintenance work performed by the City's Wastewater Division. In addition, the DR 3 and JD 33.4 sampling and testing allows SVID to monitor any elevated bacteria concentration levels that could be directly related to any identifiable, illicit sources of contamination into SVID's drains and joint drains near and within the city limits. SVID believes this data collection and sharing will continue to maintain collaboration efforts with the City of Sunnyside in supporting the elimination and prevention of illicit connections and/or discharges to SVID's drainage system.

2.6) Pollution Prevention and Good Housekeeping for Municipal Operations

The following minimum control measure is a key element of the small MS4 stormwater management program. The Pollution Prevention and Good Housekeeping practices for municipal operations require MS4 operators to examine and subsequently alter their own actions to help ensure a reduction of the potential for stormwater runoff to come into contact with pollutants generated from a facility's operation and maintenance activities. Some examples of where stormwater pollution from municipal operations come from include streets, parking lots, open spaces, buildings, storage and vehicle maintenance areas, new construction and land disturbances, and stormwater system maintenance. In addition, having good pollution preventive maintenance and housekeeping procedures will result in cost savings for the MS4 operator, since proper and timely maintenance of the stormwater sewer system can help avoid major repair costs from damage caused by age and neglect.

Section S6.D.6 of the EWA Phase II Municipal Stormwater Permit requires that each Secondary Permittee shall implement the following pollution prevention and good housekeeping measures or strategies. From the initial date of permit coverage, each Secondary Permittee shall:

a. Implement a municipal Operation and Maintenance Plan (O&M Plan) to minimize stormwater pollution from activities conducted by the Secondary Permittee. The O&M Plan shall include appropriate pollution prevention and good housekeeping procedures for all of the following operations, activities, and/or types of facilities that are present within the Secondary Permittee's boundaries and under the functional control of the Secondary Permittee. The O&M Plan shall be updated, as needed, no later than July 1st, 2027.

    i. *Stormwater collection and conveyance systems, including catch basins, stormwater pipes, open channels, culverts, and stormwater treatment and/or flow control BMPs and facilities.* The O&M Plan shall address, at a minimum: scheduled annual inspections, and maintenance activities, including cleaning and proper disposal of waste removed from the system. Secondary Permittees shall properly maintain stormwater collection and conveyance systems owned or operated by the Secondary Permittee, and regularly inspect and maintain all stormwater facilities to ensure facility function.

    Secondary Permittees shall establish maintenance standards that are as protective or more protective of facility function than those specified in the *Stormwater Management Manual for Eastern Washington*.

    Secondary Permittees shall review their maintenance standards to ensure they are consistent with the requirements of this Section.

    Secondary Permittees shall conduct spot checks of potentially damaged permanent stormwater treatment and flow control facilities following

major storm events (24-hour storm event with a 10-year or greater recurrence interval).

ii. *Roads, highways, and parking lots*. The O&M Plan shall address, at a minimum: deicing, anti-icing, and snow removal practices, snow disposal areas, material (e.g., salt, sand, or other chemical) storage areas, all-season BMPs to reduce road and parking lot debris, and other pollutants from entering the MS4.

iii. *Vehicle fleets*. The O&M Plan shall address, at a minimum: storage, washing, and maintenance of Secondary Permittee vehicle fleets; and fueling facilities. Secondary Permittees shall conduct all vehicle and equipment washing and maintenance in a self-contained covered building or in designated wash and/or maintenance areas.

iv. *External building maintenance*. The O&M Plan shall address, at a minimum: building exterior cleaning and maintenance, including cleaning, washing, painting; maintenance and management of dumpsters; and other maintenance activities. Structures built between 1950 and 1980 and confirmed or suspected to have PCB-containing materials shall not discharge washdown to the MS4.

v. *Preparing Permittee-owned buildings for renovation or demolition*. The O&M Plan shall address source control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.

vi. *Parks and open space*. The O&M Plan shall address, at a minimum: proper application of fertilizer, pesticides, and herbicides; sediment and erosion control; BMPs for landscape maintenance and vegetation disposal; and trash and pet waste management.

vii. *Material storage facilities and heavy equipment maintenance or storage yards*. Secondary Permittees shall develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to protect water quality at each of these facilities owned or operated by the Secondary Permittee and not covered under the *Industrial Stormwater General Permit* or another NPDES permit that authorizes stormwater discharges associated with the activity.

viii. *Other facilities that would reasonably be expected to discharge contaminated runoff*. The O&M Plan shall address proper stormwater pollution prevention practices for each facility.

b. From the initial date of permit coverage, Secondary Permittees shall also have permit coverage for all facilities operated by the Secondary Permittee that are

required to be covered under the *Industrial Stormwater General Permit* or another NPDES permit that authorizes surface water discharges associated with the activity.

c. The O&M Plan shall include sufficient documentation and records as necessary to demonstrate compliance with the O&M Plan requirements in S6.D.6.a(i) through (viii) above.

d. No later than three years from the initial date of permit coverage, Secondary Permittees shall implement a program designed to train all employees whose construction, operation, or maintenance job functions may impact stormwater quality. The training shall address:

   i. The importance of protecting water quality.

   ii. The requirements of this Permit.

   iii. Operation and maintenance requirements.

   iv. Inspection procedures.

   v. Ways to perform their job activities to prevent or minimize impacts to water quality.

   vi. Procedures for reporting water quality concerns, including potential illicit discharges and spills.

PERFORMANCE MEASURE

S6.D.6 Implement an O&M Plan to minimize stormwater pollution to the MS4 system within the district campus facilities

GOAL

S6.D.6.a(i-vii) Implement an Operation and Maintenance Plan (O&M Plan) to minimize stormwater pollution from activities conducted within the SVID Campus Facilities. The O&M Plan shall include appropriate pollution prevention and good housekeeping procedures for all maintenance operations, activities, and/or types of facilities that are present within the campus boundaries and under the functional control of SVID.

EXISTING ACTIVITES

SVID implements an irrigation district campus operation and maintenance (O&M) plan to minimize stormwater pollution from activities it conducts. The O&M Plan includes appropriate pollution prevention and good housekeeping procedures for all of the following operations, activities, and/or types of facilities that are present within the SVID Campus Facilities. The following pollution prevention and good housekeeping practices described below are part of the **district campus O&M Plan**:

1. The SVID water quality staff routinely inspects all MS4 storm drain inlets, on the SVID Campus Facilities (Figure 1), to ensure proper maintenance and function at least one third (on average) each year, if not more than what is required for the permit. This is performed at the same time when an IDDE stormwater inspection is done (refer to pages 31 – 33 of this SVID SWMP). Spot checks of the campus facilities MS4 storm drain inlets are prioritized especially during and after a major storm event within the area of Sunnyside. The data below shows the latest 24-hour recurrence interval (frequency) of storm events for Sunnyside:

10-year storm	1.3”	24-hour period
25-year storm	1.6”	24-hour period
50-year storm	1.8”	24-hour period
100-year storm	2.0”	24-hour period

Reference(s):

Department of Ecology. July 2024. Stormwater Management Manual for Eastern Washington. 2024.. Department of Ecology, Water Quality Program, Olympia, WA. pgs. 254-257. Publication No. 24-10-014.https://fortress.wa.gov/ecy/ezshare/wq/SWMMs/2024SWMMEW/Content/Resources/DocsForDownload/2024SWMMEW_6-14-24.pdf

Miller, J.F., R.H. Frederick and R.S. Tracey. 1973. NOAA Altas 2, Precipitation-Frequency Altas of the Western United States, Volume IX – Washington. U.S. Dept. of Commerce, National Oceanic and Atmospheric Administration (NOAA), and National Weather Service. Washington, D.C.

All MS4 storm drain inlet inspection information, weather conditions, and maintenance recommendations are recorded on an Illicit Discharge Detection and Elimination (IDDE) stormwater inspection form. These forms are saved and archived electronically.

2. During and/or after heavy snowfall events the SVID Drains Department hauls any excessive snow accumulation from all of the campus facilities as needed and deposits the snowpack at an offsite SVID location. In addition, before, during, and/or after snow and ice removal activities the appropriate amount of deicer is applied to the district campus facilities (Areas One - Three) according to label directions and when proper weather temperatures occur. The deicer products are stored in airtight bags and/or containers within campus facility storage outbuildings and away from all storm drain inlets when not in use. Both the West and East Pipe Yards (Areas Two and Three) are inspected and monitored for blown in trash and are cleaned as thoroughly as possible especially around or near the storm drain inlets (catch basins and manholes). Any trash or unwanted debris is disposed of in a dumpster located in the East Pipe Yard (Area Three). The storm drain inlet covers are swept clean of dirt and/or debris.

3. All SVID district vehicle fleets and heavy machinery equipment are cleaned on warm, sunny days throughout the year in a designated wash bay located on the north side of the district's Maintenance Shop (Area One). A pressure washer is used for rinsing purposes and water conservation efforts are implemented when a washing event occurs in the bay. Afterwards, all of the wastewater from vehicles and machinery equipment is cleaned off the concrete surface and directed to the drain inlet on the east end of the vehicle bay using the pressure washer. In addition, the Shop Department crew members clean the vehicle wash bay about every three months and inspect for maintenance. The wastewater directed into the vehicle bay drain inlet discharges to an oil-water separator located to the southeast of the bay (green triangle symbol on Figure 1). The SVID Campus oil-water separator at the vehicle wash bay is cleaned by a service contractor and hauled offsite annually. The contracting company disposes of the waste in an environmentally friendly, safe, and legal manner.

4. The Maintenance Shop, where heavy equipment and/or vehicle fleet mechanical work is performed, is in an enclosed building with a concrete floor. The floor is swept clean at the end of every day and the waste is disposed of in a nearby dumpster in an environmentally safe manner. The oil disposal and battery recycling containers are behind the Maintenance Shop on a concrete pad with a covered roof. Secondary spill containment is used until the items are properly disposed of at the Yakima County Hazardous Waste Facility via the Terrace Heights landfill. All large quantities of hazardous waste are picked up and disposed of in an environmentally friendly and safe manner by a service contractor.

5. BMPs for landscaping maintenance within the SVID Campus Facilities are used

by a contract provider. All herbicides and fertilizers are properly applied according to label requirements to prevent runoff from occurring.

6. County operated waste collection haulers unload all garbage dumpsters weekly within the SVID Campus Facilities. Any smaller, accepted recyclable waste items are hauled and disposed of at the local public works recycling collection center. There are also designated dumpsters for scrap metal that are hauled offsite and disposed of in an environmentally safe manner (i.e., recycled) by a service contractor.

7. SVID also has a designated, enclosed pesticide storage outbuilding (shed) for all herbicide chemicals used by the district. The pesticide storage shed is always securely locked and only authorized personnel have access. The inside of the storage shed has natural ventilation, an impervious (nonporous) floor surface, and there is a spill blocker barrier (dike) placed in the front of the one entrance. All herbicides are stored off the ground using tote-boxes, shelves, and other storage cabinets. Any empty pesticide containers are triple rinsed before being collected and disposed of by a recycling waste contract hauler.

8. The Yakima County and City of Sunnyside Fire Department officials on an annual basis inspects the SVID Campus Facilities to ensure the district is in compliance with all the required NFPA codes and standards.

MEASURABLE ACTIVITIES

SVID will review and update as needed its existing O&M Plan for the district's campus facilities annually. Also, a portion of the O&M Plan update and revision process for the SVID campus facilities will include its existing Stormwater Pollution Prevention Plan (SWPPP).

SVID will monitor the frequency, and amount of maintenance work and/or material waste disposal related to O&M activities performed around the campus facilities.

ASSESSMENT

1. Monitor all inspections, and maintenance and/or repair work performed on the MS4 system within the SVID Campus Facilities.

2. Retain all records related to O&M Plan activities within the SVID Campus Facilities.

3. Track any changes made to the O&M Plan and/or SWPPP for maintenance activities performed around the campus facilities.

ACCOMPLISHMENTS

SVID reviewed the content of the maintenance activities and/or BMPs in its district campus O&M Plan, and SWPPP during this last 2024 calendar year. SVID Drains Department laid fresh pea gravel and regraded the unpaved, gravel road surfaces in Areas One and Three of the Campus Facilities (Figure 1) in early February 2023. In addition, SVID's service contractor fixed a clogged sump on the oil-water separator, and also removed all the waste from it (green triangle symbol in Figure 1) on March 19th, 2024.

PERFORMANCE MEASURE

S6.D.6 If required, obtain coverage under a NPDES General Permit for stormwater discharges associated with Industrial Activities

GOAL

S6.D.6.b. From the initial date of Permit coverage, SVID shall also have permit coverage for all facilities operated by the district that are required to be covered under the *Industrial Stormwater General Permit* or another NPDES permit that authorizes surface water discharges associated with the activity.

EXISTING ACTIVITIES

The SVID Campus Facilities are not industrial sites and therefore does not require coverage under the *Industrial Stormwater General Permit*. However, some of the industrial factories and/or businesses within the City of Sunnyside limits, but outside the district campus facilities, are discharging into SVID's owned/operated project waterways (i.e., drains, joint drains, and wasteways). Therefore, SVID will occasionally coordinate with Ecology and other local entities to ensure that those outside campus industries are complying with their NPDES *Industrial Stormwater General Permit* and/or SVID's issued drain inlet permit requirements.

SVID developed and implements a Stormwater Pollution Prevention Plan (SWPPP) related to campus facility activities involving material storage, heavy equipment storage, and/or maintenance areas. This document is reviewed and updated if needed on an annual basis.

MEASURABLE ACTIVITIES

SVID will annually review and update if needed its SWPPP related to campus facility activities.

ASSESSMENT

1. Track any changes made to the district's SWPPP related to campus facility activities involving material storage, heavy equipment storage, and/or maintenance areas.

2. Document each project reviewed and listed on the Master Work Schedule. This schedule has a check point for all relevant permits.

ACCOMPLISHMENTS

This past 2024 calendar year SVID reviewed the content in its district campus O&M plan, and SWPPP.

PERFORMANCE MEASURE

S6.D.6 District Campus O&M Plan shall include sufficient documentation and records

GOAL

S6.D.6.c. The SVID Campus O&M Plan shall include sufficient documentation and records as necessary to demonstrate compliance with the O&M Plan requirements in S6.D.6.a(i) through (vii) above [pages 52 – 55 of this SVID SWMP].

EXISITING ACTIVITIES

1. A daily scheduled work report of the Maintenance Shop employee tasks and activities is routinely distributed electronically to SVID main and field office staff, and department supervisors. The vehicle maintenance and cleaning of the associated equipment and storage yards is recorded by the Maintenance Shop. These record files are archived and kept on site.

2. A daily scheduled work report of the Drain Crew employee tasks and activities is also routinely distributed electronically to SVID main and field office staff, and department supervisors. This report will document any crew activity in the drains districtwide, and/or maintenance activities on the district campus facilities.

3. SVID documents O&M Plan related inspections, and maintenance and/or repair work performed within the SVID Campus Facilities.

4. All environmental hauling service invoices are paid within 30 days and are archived. These records are kept electronically as well as hard copies for seven years.

MEASURABLE ACTIVITIES

1. The electronic records for all Departments' daily scheduled work reports will be archived and be readily available for SVID personnel and/or the public.

2. Maintain and archive all O&M Plan related inspections, and maintenance and/or repair work performed within the SVID Campus Facilities.

ASSESSMENT

1. Electronically archive all daily scheduled work reports sent out by SVID department supervisors.

2. Retain all O&M Plan related documentation and records for maintenance activities performed within the SVID Campus Facilities.

ACCOMPLISHMENTS

SVID during this past 2024 calendar year has regularly tracked and archived all the Departments' daily scheduled work reports illustrating what type of O&M work was performed around the district campus facilities.

PERFORMANCE MEASURE

S6.D.6 Train all employees whose job activities may impact stormwater quality.

GOAL

S6.D.6.d. No later than three years from the initial date of permit coverage, SVID shall implement a program designed to train all employees whose construction, operations, or maintenance job functions may impact stormwater quality.

EXISITING ACTIVITIES

SVID has a Water Quality Department and Health & Safety Director on staff. The Water Quality Supervisor addresses water quality topics at safety and supervisor meetings, and training sessions along with other pertinent information. The Health & Safety Director conducts meetings or supplies information for staff training events throughout the year. The topics and information in these staff training sessions range from safety precaution guidelines when working in or around a waterway to how to respond to spill incidents. Signed safety sheets along with the prepared safety information are filed and archived for documentation. These training sessions include:

a. Annual All SVID staff safety meeting, held each December.

b. Annual Ditchriders meeting, held each March.

c. Annual Public Operator Pesticide License Recertification Course (i.e., Spray Class), held each February.

d. Annual aquatic herbicide application and safety protocols for treatment crews, usually during the Public Operator Pesticide License Recertification Course.

e. Monthly Safety Committee meetings chaired by the Health & Safety Director where elected union and non-union representatives from the Upper End and Lower End Divisions; and Maintenance Shop, Drains, and Water Quality Departments all attend.

f. Weekly staff safety meetings are held by each department supervisor with their crew members. The Health & Safety Director supplies information for this meeting.

MEASURABLE ACTIVITIES

1. SVID Management and Supervisors will identify those departments and employees who require training. Staff will be trained in:

    i. The importance of protecting water quality.

ii. The requirements of the SVID SWMP and EWA Phase II Municipal Stormwater permit.

iii. Operation and maintenance requirements.

iv. Inspection procedures.

v. Ways to perform their job activities to prevent or minimize impacts to water quality.

vi. Procedures for reporting water quality concerns, including potential problems that may arise.

2. SVID's Water Quality Department will train employees, in-house or bring in certified trainers, on water quality significance and issues.

ASSESSMENT

1. Document and archive electronically each training event with signature sheets for attendance.

2. Maintain records of the date, location, and employee attendance for monthly and annual safety meetings and/or training sessions for the district.

3. Track changes made to staff training efforts for addressing spill incidents and prevention of illicit discharges districtwide, and/or into the MS4 system within the campus facilities.

ACCOMPLISHMENTS

The district had to postpone its annual Public Operator Pesticide Recertification Course (eight hours in duration) later in the year, where currently it is scheduled to take place on October 28th, 2025. Some information within several of the course topics will cover spill prevention and response guidance.

Lastly, all district field or laborer staff attended a trenching and shoring workshop course on June 20th, 2024; and an excavation, trenching, and shoring safety course on September 25th, 2024. Some of the topics and information provided in the training course included erosion and sediment control and/or safety awareness.