



STORMWATER MANAGEMENT PROGRAM PLAN

2019 UPDATE

WASHINGTON STATE MILITARY DEPARTMENT (WMD)
CAMP MURRAY, WA 98430
Permit No. WAR04-4203

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1.0 INTRODUCTION

1.1 Overview

This document outlines the Washington Military Department's (WMD) Stormwater Management Program (SWMP) Plan for its Camp Murray installation. The Washington State Department of Ecology requires development and implementation of the SWMP to comply with the Western Washington Phase I Municipal Stormwater Permit (the Permit). The Permit covers discharges from regulated municipal separate storm sewer systems (MS4). As an owner/operator of an MS4 that discharges stormwater in unincorporated Pierce County, WMD is required to obtain permit coverage for Camp Murray facilities as a Secondary Permittee. The purpose of the Permit is to protect water quality by reducing the discharge of pollutants in compliance with requirements of the federal Clean Water Act.

1.2 Stormwater Pollution

According to the Washington State Department of Ecology's website, stormwater is one of the leading threats to Washington State's waters, streams, and marine habitats, especially in or adjacent to urban areas. Stormwater is defined as any rain or melting snow that flows off buildings, streets, parking lots, or other paved areas. Unlike industrial or sanitary wastewater, stormwater is not treated. Even when it goes down a storm drain, it eventually flows directly to streams, lakes, and marine waters. On its way to the storm drain, flowing water picks up many types of pollutants, including fertilizers, oil, heavy metals, trash, manure, and other chemicals, making it one of the most toxic inputs to natural waters.

Stormwater pollution affects the health and safety of the aquatic environment and the species that live there. Fish and shellfish that concentrate stormwater pollutants also pose a threat to human consumption. Polluted waters can become unfit for swimming or drinking. In addition, unmanaged stormwater can damage wildlife habitats, increase both flooding and drought, and contaminate groundwater.

Under the stormwater permit, WMD at Camp Murray manages stormwater discharges that flow directly to American Lake, Murray Creek, and groundwater aquifers. By implementing best management practices under the SWMP, the WMD reduces pollutant loads in discharged waters and decreases the intensity of peak flow runoff.

1.3 Stormwater Regulations

As a requirement of the Federal Clean Water Act (CWA), the Environmental Protection Agency prepared and issued the National Pollution Discharge Elimination System (NPDES) Phase I regulations to allow permittees to discharge municipal stormwater runoff to state water bodies. The discharges are only allowed if permittees protect water quality. Specifically, the regulation requires that permittees use "all known, available, and reasonable methods of prevention, control and treatment" (AKART) to implement "best management practices" (BMPs) that reduce non-point source pollution to the "maximum extent practicable" (MEP).

The Environmental Protection Agency (EPA) delegated the NPDES permit authority to state environmental agencies. In Washington State, the Department of Ecology (Ecology) has jurisdiction for implementing the NPDES permits program. Ecology issued the first Phase I MS4 permit for select cities and counties across the state, including Pierce County, in July 1995. On January 17, 2007 Ecology issued a new Phase I MS4 permit that became effective on February 16, 2007. It was modified on June 17, 2009 and September 1, 2010. In response to the direction from the Legislature, Ecology issued a new NPDES Stormwater Permit for Phase I municipalities on August 1, 2012, effective September 1, 2012 and expiring on July 31, 2013. Ecology also issued the new 2013-2018 Phase 1 MS4 permit on August 1, 2012, with an effective date of August 1, 2013 and expiring on July 31, 2018. Currently, the WMD is covered under this permit, which was extended until August 1, 2019. At that time, a new permit to be issued on July 1, 2019 will become effective.

The Phase I MS4 permit is viewable online at Ecology's website:

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Municipal-Stormwater-Phase-I-Permit>

2.0 SECONDARY PERMITTEE REQUIREMENT

Camp Murray facilities owned and/or operated by the Washington Military Department (WMD) are included as a Phase I MS4 Secondary Permittee under permit number WAR04-4203.

Special Condition S6 of the Permit requires each Secondary Permittee to develop and implement a Stormwater Management Program (SWMP), which must be documented in an annually updated SWMP Plan (the Plan). The purpose of the SWMP is to reduce pollutant discharge from the municipal stormwater system to the maximum extent practicable (MEP), thereby protecting surface and ground water quality. The Plan specifies the best management practices (BMPs) used to accomplish this goal. The practices required for inclusion in the Plan are outlined in S6.D of the permit and fall into the following categories:

- S6.D.1 Education and Outreach
- S6.D.2 Public Involvement and Participation
- S6.D.3 Illicit Discharge Detection and Elimination
- S6.D.4 Construction Site Stormwater Runoff Control
- S6.D.5 Post-Construction Stormwater Management for New Development and Redevelopment
- S6.D.6 Pollution Prevention and Good Housekeeping

WMD's first SWMP Plan was submitted to Ecology in March 2011. This version of the SWMP has been updated to incorporate modifications to or additional sets of actions planned for 2019. The content of this document is based upon the requirements in the permit as well as resources

available on Ecology's website: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Stormwater-permittee-guidance-resources>

In addition to the SWMP plan requirement, the permittee must submit annual written compliance reports to Ecology on March 31st for activities covering the previous calendar year. These reports summarize SWMP implementation status and present information from assessment and evaluation activities conducted during the reporting period.

Both the annual report and the SWMP plan are available for public review on the WMD's Environmental Program's website at <https://mil.wa.gov/environmental-programs>.

Additionally, S6.D.6.vi of the Permit (Pollution Prevention and Good Housekeeping for Municipal Operations) requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for material storage facilities and heavy equipment maintenance and storage yards. Camp Murray's SWPPP for three identified catch basins associated with this type of activity was first developed in 2012 and updated in 2014. A copy of the SWPPP is available from Camp Murray's Environmental Program Office. To meet the requirements of Title 40, Code of Federal Regulation, Part 112 (40 CFR part 12) a Spill Prevention Control and Countermeasures (SPCC) Plan, last updated in 2017, is also in effect and provides guidance for Camp Murray's stormwater management.

2.1 Document Organization

The remainder of this SWMP document is organized according to the S6 permit requirements:

Section 3.0 – Permit Requirements for Public Education and Outreach.

Section 4.0 – Permit Requirements for Public Involvement and Participation.

Section 5.0 – Permit Requirements for Illicit Discharge Detection and Elimination.

Section 6.0 – Permit Requirements for Construction Site Stormwater Runoff Control.

Section 7.0 – Permit Requirements for Post-construction Stormwater Management for New Development and Redevelopment.

Section 8.0 – Permit Requirements for Pollution Prevention and Good Housekeeping.

The S7 and S8 TMDL and Monitoring Requirements (Exempt)

Section 9.0 – Exempt Requirements

The S9 Reporting Requirements

Section 10.0 – Permit Reporting Requirements

And the General Condition G3

Section 11.0 – Spill Response Procedures

Each section includes a summary of the relevant permit requirements completed to date and a description of current and planned compliance activities implemented by WMD at Camp Murray.

2.2 Coordination of Permit Coverage Activities

The Permit affects only the WMD's headquarters facility: Camp Murray in Pierce County, Washington. Implementing the Permit requirements at the Camp Murray installation requires coordination across several departments and agencies. The WMD, a state agency, administers the program through its Environmental Program Office, a section within Construction Facilities Maintenance and Operations Department. Administrative activities are also coordinated with the Environmental Office for the Washington Air National Guard, a federal agency and leaseholder on Camp Murray. WMD Construction and Maintenance departments are also responsible for executing tasks and coordinating with on-site contractors, in coordination with the Environmental Program Office.

2.3 Facility Description

Established around 1903 in the South Puget Sound Region, Camp Murray lies within the unincorporated area of Pierce County. The State military installation provides facilities for the Washington State Military Department, which consists of Army National Guard, Air National Guard, and other state services such as Emergency Management Division. It lies adjacent to Joint Base Lewis McChord to the South and West and to residential neighborhoods of Tillicum to the East and North. It is situated in approximately 240 acres of developed and undeveloped woodlands with a mix of structures dating back to 1916 (Figure 1).

The installation lies on the eastern edge of American Lake, a dominantly groundwater-fed lake, which is a regional recreational area used for boating, fishing, and camping. Camp Murray Beach RV Park and Campground is also located along the east shores of American Lake.

Murray Creek, a perennial stream within the Chambers-Clover Creek Watershed, flows through the installation. The creek begins on the adjacent Joint Base Lewis McChord (JBLM) Military installation and ends at American Lake. The topography of the site is relatively flat with some slopes in southern areas and along the lake.

3.0 PUBLIC EDUCATION AND OUTREACH

This Section describes the permit requirements related to Public Education and Outreach, including current and planned compliance activities.

The permit requires WMD to implement a public stormwater education program consisting of the following elements:

- Clearly label all storm drain inlets with message similar to, "Dump no waste – Drains to water body" (S6.D.1.a)

Because of WMD’s direct interaction with the public through recreational shoreline use of Camp Murray, outside contractors, and many state and federal personnel, WMD also implements the following education component required for public ports, colleges, and universities.

- Distribute electronic or printed educational information to tenants and residents about the impact of stormwater discharges on receiving waters and steps to take to reduce pollutant loads (S6.D.1.b)



Figure 1. Map of Camp Murray

3.1 Storm Drain Labeling

In 2009, WMD commissioned TEC Inc. to inspect and label all storm drains and water features at Camp Murray. All storm drain inlets operated and maintained under the Permit were labeled with the message “Dump No Waste”, along with the point of discharge. To date, ninety five percent of the storm drains owned and operated by WMD are labeled. As part of the maintenance for these storm drains and as required by this permit, any storm drains where

the label has faded, is removed, or is unreadable is re-labeled within 90 days of discovery.

3.2 Public Education

Since 2014, the WMD stormwater manager has annually distributed educational information materials to agency staff. In 2019, this distribution will continue. Additionally, materials are provided to campground hosts to distribute to campground users and the contracting office to provide to contractors. These materials highlight the importance of stormwater pollution prevention and strategies to reduce stormwater pollutants. Educational materials are in the form of newsletter articles, brochures, one-page flyers, or e-mail message(s). Below are the topics that will be addressed every year, when relevant:

1. What is stormwater and how does it affect water bodies?
2. What are the impacts of stormwater pollution?
3. What practices contribute to stormwater pollution?
4. What are the benefits of protecting storm drains and waterbodies?
5. What steps can be taken to minimize water pollution?

In addition to annual outreach, the WMD has developed educational signage around the Campground area that highlights the importance and strategies to reduce stormwater pollution. A sign specifically designed for clean water outreach was installed along the shores of American Lake in 2018. These and other outreach signs will continue to be maintained in 2019.

4.0 PUBLIC INVOLVEMENT AND PARTICIPATION

This section describes the Permit requirements related to Public Involvement and Participation, including current and planned compliance activities and public notices.

As required by this Permit, the WMD shall no later than May 31, make the annual stormwater report and the latest updated version of the SWMP Plan available to the public.

To accomplish this requirement, the WMD posts the annual report and latest updated SWMP Plan for Camp Murray on its agency website at <https://mil.wa.gov/environmental-programs>. This website informs the public that the Permit regulates stormwater discharges from the municipal separate storm sewer system located at Camp Murray and that the Permit requires WMD to develop and implement a Stormwater Management Program with the following goals:

1. Reduce the discharge of pollutants to the maximum extent practicable;
2. Protect water quality;

3. Satisfy appropriate requirements of the Clean Water Act.

The public is invited to comment on the plan or to request review of a hard copy of the plan at the following point of contact:

Washington Military Department Environmental Program
Water Quality Program Manager
Bldg 36 Quartermaster Rd
Camp Murray, WA 98430
Tel: (253)-512-8704

5.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

This section describes how the WMD fulfills the permit requirements related to illicit discharge detection and elimination (IDDE), including current and planned compliance activities and policy changes.

The Permit requires WMD to implement an IDDE program consisting of the following elements:

- Comply with all relevant ordinances, rules, and regulation of the local jurisdictions in which the WMD is located that govern non-stormwater discharges.
- Implement appropriate policies prohibiting illicit discharges. Implement an enforcement plan to ensure compliance with policies.
- Maintain a storm sewer system map showing the locations of all known storm drain outfalls, labeled receiving waters, and delineated areas contributing runoff to each outfall. Conduct field inspections and visually inspect for illicit discharges at all known MS4 outfalls
- Implement a spill response plan that includes coordination with a qualified spill responder or other personnel, as the spill
- Provide staff training or coordinate with existing training efforts to educate staff on proper BMPs for preventing illicit discharges, including spills. Train all staff who, as part of their normal job responsibilities, have a role in preventing such illicit discharges.

5.1 Compliance with local jurisdiction

As a state agency, WMD is obligated to abide by all relevant federal, state and local laws, rules and regulations.

Army policy is to integrate environmental stewardship with the mission in accordance with AR 200-1, AR 200-2, AR 200-3, AR 200-4, AR 200-5, and AR 350-4. This includes reduction or elimination of pollution at the source, conservation and protection of natural and cultural

resources, integration of environmental consideration into all activities, conducting operations that are environmentally acceptable and that enhance the soldier's and the civilian's quality of life, complying with all applicable environmental laws, restoring previously contaminated sites, and allocating resources and training to protect the environment.

5.2 IDDE Policies and Enforcement Plan

WMD has established and enforces policies that prevent illicit discharges to the maximum extent practicable. As WMD maintains and manages secure facilities, the agency can easily manage and track the flow of people and materials on the facility. Army National Guard (ARNG) and Air National Guard (ANG) have policies that specifically address stormwater issues and protection of natural resources in compliance with all Federal, state and local laws and regulations regarding health, and environmental protection (CFR title 32, chapter 5, part 650, Army regulations AR 200-1, 194 Wing (WG)). These policies are reviewed periodically and amended as necessary by WMD to meet stormwater regulations. WMD will draft new policies, as necessary, to comply with any changes to the Permit in the future. With a clear chain of command, WMD can effectively implement and disseminate policies to state and federal employees.

Existing policies require that spills and other illicit discharges on Camp Murray be reported to the WMD Environmental Office, Air Guard Environmental Office, local governments, and Ecology as appropriate. These notifications are coordinated facility-wide through a central point of contact, the Emergency Management Division. The WMD and Air Guard Environmental Offices are responsible for reporting and follow-up activities with Ecology. The spill response flow chart is presented in Appendix A. Hazardous waste management policies are also in place that track and monitor all use and disposal of hazardous material, pollutants, and products within the facility. An annually updated Integrated Pest Management Plan additionally tracks proper use and disposal of approved pesticides. Coordination with Camp Murray Maintenance and Unit Operation managers further ensures that infrastructure and equipment is maintained to prevent illicit discharges on the installation.

In compliance with the Permit, allowable discharges on Camp Murray include the following:

- (1) Diverted stream flows
- (2) Rising ground waters
- (3) Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(b)(20))
- (4) Uncontaminated pumped ground water
- (5) Foundation drains
- (6) Air conditioning condensation
- (7) Irrigation water from agricultural sources that is commingled with urban stormwater
- (8) Springs
- (9) Uncontaminated water from crawl space pumps
- (10) Footing drains
- (11) Flows from riparian habitats and wetlands
- (12) Discharges from emergency firefighting activities in accordance with S2 Authorized Discharges
- (13) Non-stormwater discharges authorized by another NPDES or State Waste Discharge

permit

The following discharges are allowed conditionally on Camp Murray, given that the following conditions are met:

(1) 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. *These discharges are allowable only if planned and managed to be de-chlorinated 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.*

(2) Discharges from lawn watering and other irrigation runoff. *These discharges are allowable only if irrigation is limited landscaped areas in summer months and best practices are in place to minimize water usage, including frequent monitoring of irrigation of schedules and coverage to ensure that landscapes are not over-watered.*

(3) Street and sidewalk wash water, water used to control dust, and routine external building washdown that does not use detergents. *These discharges are allowable only in a limited capacity to remove moss and other debris from existing buildings and sidewalks. No chemicals or detergents are removed in the washwater.*

5.3 Stormwater System Mapping

In 2011, the Military Department manually mapped the stormwater infrastructure and outfalls for Camp Murray. In 2014, the existing stormwater map was converted into a GIS format. Annual inspections ensure the accuracy of mapping, and the map is updated as necessary to accurately identify known outfalls, receiving waters, and delineated areas contributing runoff to each outfall. Stormwater features built during new construction or removed due to demolition projects are also annually updated in the map. The map is available for review upon request from the Environmental Program Office.

5.4 IDDE Inspection Program

WMD has developed procedures to inspect for illicit discharges on a regular basis. Illicit discharges include spills of hazardous materials, discharges not explicitly listed in Section 5.2, or wastewater that enters the stormwater system due to improper connections in the wastewater or stormwater system. If an illicit discharge is detected, WMD will follow procedures to correct and report the discharge. Spills of hazardous materials are managed through the WMD's spill reporting protocol. The appropriate local agency or Ecology is notified immediately when there is a discharge to waters of the state.

To detect illicit discharges, one-third of all known outfalls and discharge points across Camp Murray are inspected annually. These annual inspections occur during the dry weather period between May 1 and September 30. Additionally, spot checks of catch basins, storm drains, and outfalls are conducted after a heavy storm event (greater than or equal to one inch in 24-hour period) for visible pollutant discharges leaving the site. Findings of illicit discharges are documented in field inspection forms. Should illicit discharges be observed in any of the storm water features, an investigation is conducted to determine the source of the pollutant and a

corrective then developed to eliminate the discharge.

The Air National Guard has one oil/water separator for their outdoor/covered vehicle wash area that is used infrequently. Historical data shows little to no measurable oils in the sump or the main tank. As a result, inspections have been set to a quarterly frequency.

Catchment Basins associated with equipment maintenance and materials storage yards receive more frequent illicit discharge inspections, as identified in Camp Murray's SWPPP (2014). Inspections of all stormwater features in these catchbasins occur quarterly during wet weather (Oct 1 – April 30) and annually during the dry weather season (May 1 – Sept 30). Visual inspections also occur after a heavy storm event of greater than 1 inch in a 24-hour period.

5.5 Spill Response Plan

WMD its codified spill response plan, which coordinates with a qualified spill responder, in the May 2012 Installation Contingency Plan (ICP) & Spill Prevention, Control, and Countermeasure Plan (SPCC), most recently updated in March 2017. In addition to the spill response plan, WMD hired a contractor to write a Stormwater Pollution Prevention Plan (SWPPP) for the Catchment Basins associated with equipment maintenance and materials storage yards on Camp Murray. This document was completed on May 15, 2012 and updated in 2014. The federal Air National Guard also developed a separate SWPPP for use on its leased facility in August 2014.

The Air National Guard's spill response planning and training is conducted in accordance with current Federal (CFR), Air Force and Air National Guard (AFI), State (WAC), local, and the 194th WG Spill Prevention Control and Countermeasures Plan emergency spill response criteria. Training is conducted, at a minimum of annually in addition to at least hazardous spill training exercise or Major Accident Response Exercise (MARE) to assess and evaluate the current training objectives.

5.6 Staff Training

Currently, WMD conducts spill response, illicit discharge prevention, and stormwater best management practices training for Army National Guard during its Unit Environmental Compliance Officers (UECOs), held at least once a year on Camp Murray. Army National Guard Unit Environmental Compliance Officers (UECOs) are trained every two years in accordance with 40 CFR 122.34 and AR 200-1 and are the responsible party in their units for complying with environmental regulations at any duty location, including Camp Murray. Spill response training has also been incorporated in new employee orientation for federal and state employees. This spill response training complies with 40 CFR 112 and WAC 173-180C-050.

The Air National Guard's spill response planning and training is conducted in accordance with current Federal (CFR), Air Force and Air National Guard (AFI), State (WAC), local, and the 194th WG Spill Prevention Control and Countermeasures Plan emergency spill response criteria, dated April 2008. Training is conducted at least annually. Air National Guard Unit Environmental Coordinators are provided additional training information and updates, as necessary. The Unit

Environmental Coordinators are responsible for providing unit members with sustainment and additional training throughout the year in addition to the annual requirements.

6.0 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

This section describes how the WMD's current and planned compliance activities fulfill the following permit requirements related to construction site runoff control.

- Comply with all relevant ordinances, rules, and regulation of the local jurisdictions in which the WMD is located that govern construction phase stormwater pollution prevention measures.
- Ensure that all construction projects under the functional control of the WMD that require a construction stormwater permit obtain coverage prior to discharging construction-related stormwater.
- Coordinate with local jurisdictions regarding projects owned or operation by other entities which discharge into the WMD's MS4 and to assist the local jurisdiction with achieving compliance with all relevant ordinances, rules, and regulation of the local jurisdictions.
- 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.
- Coordinate as requested with Ecology for the local jurisdiction to provide access for inspection of construction sites or other land disturbances, which are under the functional control of the WMD during land disturbing activities and /or the construction period.

6.1 Compliance with Requirements of Local Jurisdictions

As a state agency, WMD is obligated to abide by all rules and regulations of all jurisdictions where they reside including 40 CFR 122.26 and RCW 90.48.

6.2 NPDES Construction Permitting Requirement

WMD requires that its contractors prevent erosion and discharge of sediment and other pollutants into receiving waters in accordance with Washington State Water Pollution Control Law (RCW 90.48) and the Federal Water Pollution Control Act (Title 33 USC Section 1251 et seq.). Contractors must acquire NPDES Construction Stormwater General Permits (CSWGP) for construction and demolition projects that impact one acre or more, or any size project that discharge directly to waters of the State. Contractors must have a Construction Stormwater Pollution Prevention Plan (SWPPP) in place for any project that results in 2,000 sq. ft. or more of new plus replaced hard surface areas, or which disturbs 7,000 sq. ft. or more of land. The WMD Environmental Program Office assists the Construction Office in reviewing these SWPPP and CSWGP documents prior to construction.

6.3 Coordination with Local Jurisdictions on Outside Projects

WMD's new main gate and traffic circle, completed in January 2013 and owned and operated by the City of Lakewood, discharged construction site stormwater runoff into Camp Murray's municipal separate stormwater system. Located on the northwest side of the installation, the traffic circle at the main gate continues to discharge stormwater to Camp Murray's detention pond, as coordinated by the City and WMD.

The 2019-2021 WSDOT improvement project at the Berkeley St. interchange abuts Camp Murray's commercial vehicle gate. Currently, no construction stormwater is planned to discharge into Camp Murray's MS4. Coordination with the improvement project occurs at monthly project meetings. WMD staff monitor the project boundary to ensure stormwater best management practices are in place and that stormwater discharges do not occur. If stormwater discharges are detected, WMD will coordinate during the monthly meetings to ensure that these discharges meet Camp Murray's permit requirements.

6.4 Construction Staff Training Requirements

In compliance with the Construction Stormwater General Permit, contractors must use trained CESCL-certified inspector for projects greater than one acre or that discharge directly to waters of the state. Contractors are encouraged to have a CESCL-certified staff member, trained in stormwater management and best management practices (BMP's), on site. In addition, WMD has three Environmental Specialists who are currently trained and certified (Certified Erosion and Sediment Control Lead) to monitor the construction sites and ensure that the BMP's are followed. Camp Murray spill response procedures are also provided to all contractors prior to work initiation.

6.5 Coordination with Ecology and Local Jurisdictions for Inspection

Any Federal, state, and local agency inspector will be allowed access to WMD facilities upon request to conduct agency business.

7.0 POST-CONSTRUCTION STORMWATER MANAGEMENT FOR NEW DEVELOPMENT AND REDEVELOPMENT

This section describes how WMD fulfills the following Permit requirements related to stormwater management for new development and redevelopment.

- Comply with all relevant ordinances, rules, and regulations of the local jurisdictions in which Camp Murray is located.
- Coordinate with local jurisdictions regarding projects owned and operated by other entities which discharge in to the Secondary Permittee's municipal stormwater system.

7.1 Compliance with Local, Post-Construction Requirements

As a state agency, WMD is obligated to abide by all rules and regulations of all jurisdictions where they reside.

7.2 Coordination with Local Jurisdictions on Outside Projects

Camp Murray's new main gate, completed January 2013, has storm water features owned and operated by the City of Lakewood that discharge stormwater runoff into Camp Murray's municipal stormwater system. As part of the terms and conditions in the Right of Way permit issued to WMD by the City of Lakewood, WMD constructed a traffic circle in front of the main gate with two catch basins that discharge to WMD's stormwater collection pond. WMD coordinates with the City of Lakewood in maintenance and pollution control at the traffic circle. WMD also monitors this area during its annual inspections and can provide the annual Ecology report to the City of Lakewood upon request.

WMD, in coordination with Pierce County Public Works and Utilities Department, entered a memorandum of understanding to clarify the roles and responsibilities between interconnected Municipal Storm Sewers in relation to the traffic circle. This memorandum of understanding meets the requirement to 'establish coordination mechanisms' specified in condition S.6.B of the Permit (Stormwater Management Program for Co-permittees and Secondary Permittees-Coordination).

8.0 POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

This section describes how WMD fulfills the following Permit requirements related to pollution prevention and good housekeeping for municipal operations

- Implement a municipal operation and maintenance plan, meeting the requirements outlined in the Permit, to minimize stormwater pollution from activities conducted by the Secondary Permittee.
- Have permit coverage for all facilities owned or operated by the Secondary Permittee, which require coverage under the General NPDES Permit for Stormwater Discharges Associated with Industrial Activities.
- Include sufficient documentation and records in the O&M Plan necessary to demonstrate O&M Plan requirements in S6.D.6.a.i. through vii are met.
- Train all employees whose construction, operations, or maintenance job functions may impact stormwater quality.

8.1 Operation and Maintenance (O&M) Plan

The following Operation and Maintenance Plan is implemented by WMD to minimize stormwater pollution. Elements of the plan are also codified in the Integrated Natural Resource Management Plan, the Pest Management Plan, the Stormwater Pollution Prevention Plan

(SWPPP), and the Spill Pollution Prevention and Countermeasures (SPCC) Plan required by the Department of Defense. Specific O&M procedures for the four catch basins identified as material storage and equipment yards in Section 8.1.6 are described in more detail in the Camp Murray Stormwater Pollution Prevention Plan (2014). Finally, Air National Guard procedures are detailed in the Washington Air Guard's 194th Regional Support Wing Stormwater Pollution Prevention Plan. Employees, including construction/maintenance staff and military personnel, are trained in O&M implementation. The goal of the plan is to minimize pollutant discharge to groundwater, Murray Creek, and American Lake to the Maximum Extent Practicable.

8.1.1 Stormwater Collection and Conveyance Systems

Stormwater collection and conveyance systems, including catch basins, storm drains, culverts, sewer pipes, and open channels are annually inspected for condition and maintained as needed. These annual inspections document the general condition of the structure and include sediment depth measurements, if necessary. Inspection criteria include the grate or lid cover, sheen, foul odors, inlet and outlet pipes, flow line, erosion, trash and/or debris, overgrown vegetation, obstructions, and gravel or rip rap conditions. Additionally, visual inspections of potentially damaged stormwater features will occur after major storm events (greater or equal to 1 inch in a 24-hour period) during the wet weather season of October 1st through April 30th. All water features within the Air National Guard boundaries are inspected annually. Storm drains and dry wells are cleaned at least every two years or sooner if warranted.

Maintenance of collection and conveyance features includes cleaning vegetation, clearing debris, replacing filter inserts, pumping sediment, and performing any necessary repairs. Maintenance standards meet protective measures for facility function at or above the level specified in Chapter 4 Volume V of the 2012 Stormwater Management Manual for Western Washington. When catch basins and trench drains reach 60% full of sediment and debris, catch basins will be cleaned and pumped out by a contractor. Sediment will be kept to at least six inches below the outlet pipe. Sediment is sampled to determine its treatment as regulated waste under WAC-173-303. Unless visibly contaminated with oil or sheen, filter inserts are disposed of as non-hazardous waste. Oil collection socks or pillows are disposed of as dangerous waste per WAC-173-303.

8.1.2 Roads and Parking Lots

WMD Maintenance division maintains the roads and parking lots at Camp Murray. Maintenance owns and operates street sweeping equipment, used to clean roads and parking lots of trash, debris, and settled dust as needed. Street sweeping is performed as needed, and at least quarterly. If pollutant generating material accumulates on paved surfaces, WMD contracts for vacuum truck services on an as needed basis.

To minimize stormwater contamination from de-icing agents, mechanical removal is the preferred method to remove snow and ice from roads and parking lots. Sand is used on both roads and sidewalks as needed, and cleaned with a street

sweeper as soon as possible. Chemical de-icing agents are the least preferred methods of snow and ice removal due to their potential to mix with stormwater runoff. Maintenance and individual army national guard building managers use minimal amounts of Sodium chloride and Calcium magnesium acetate as needed to reduce the risk of ice on sidewalks directly around buildings.

8.1.3 Vehicle Fleets

WMD maintains vehicles fleets for state and federal employees. Additionally, four facilities on Camp Murray have vehicles and equipment fleets for operations and stationing, including the State Maintenance facility, the Air National Guard Compound, the United States Property and Fiscal Office, and the Pierce County Readiness Center. Vehicles are stationed at their respective facility. State Maintenance vehicles and equipment are used and parked around Camp Murray. Lawn equipment is rinsed to remove grass clippings on a designated wash rack, which drains to the sanitary sewer system. No soap is used in washing. Maintenance of State Maintenance vehicles and equipment is performed onsite in the covered maintenance building.

Military vehicle maintenance and washing is performed at Washington Army National Guard maintenance facilities on Joint Lewis Base McChord and at other designated locations across the state. State and Federal fleet vehicles are washed and maintained at either CSMS or UTES on Joint Base Lewis McChord. Air Guard fleet vehicles are maintained in the maintenance bay at Building 102. Horizontal drains in these bays that are plumbed to the OWS. Vehicles are washed on JBLM and at the Vehicle Wash rack attached to Building 102. A Spill Prevention, Control, and Countermeasure (SPCC) Plan and a Stormwater Pollution Prevention Plan (SWPPP) are in place for vehicles and equipment stationed at Camp Murray.

8.1.4 External Building Maintenance

State Maintenance or outside contractors are responsible for all building maintenance. Regular washing of floors, walls, storage yards, and other impervious surfaces is used to remove pollutants from these surfaces. Pressure washing occurs only during summer months to reduce impacts to stormwater. Washwater is collected from washing building structures during cleaning, re-modeling, or construction activities and conveyed to an appropriate treatment system prior to discharging to the sanitary sewer system. If treatment is not needed, and washwater does not contain any detergents or added cleaning/disinfection chemicals, then it may be discharged to the ground surface. Washing building structures will generally follow Ecology BMP 2-64.

Other routine maintenance activities, including window cleaning, painting, or minor repairs are performed with best management practices to prevent impact to the stormwater system. These include limiting the potential for pollutant runoff by capturing excess materials and washing all paint and other cleaning supplies in facilities connected to the wastewater system. Dumpsters and waste containers are kept clean and in good working order. All waste containers remain closed, when not in use.

8.1.5 Parks and open space

State maintenance manages grounds and open space in Camp Murray. Undeveloped natural areas constitute 46% of Camp Murray acreage (110 acres), and border natural water resources of Murray Creek and American Lake. Management in these areas is guided by Camp Murray's Integrated Natural Resource Management Plan and limited to removal of obstructive brush and debris, invasive species removal, and installation and maintenance of restoration plantings. Mechanical means are used whenever possible for vegetation removal. Pesticides are used only rarely, to control invasive plants that pose the greatest risk and under the supervision and guidance of WMD's Integrated Pest Management Plan. Restoration plantings are cultivated without fertilizers, and water conservation measures, such as ooze tubes, are utilized for watering during establishment.

Camp Murray's 130 acres of development include some landscaped and turf areas, also managed by State Maintenance. New landscaping utilizes native plantings and xeriscaping that requires little fertilizer or water. Watering is done only in dry summer months and regulated to ensure maximum conservation and prevent runoff from irrigated areas. Weeds are removed mechanically, whenever possible. Camp Murray State maintenance does not use fertilizers on its grounds and if pesticides are used, they are applied according to manufacturer instruction and not directly before a rain event. Air Guard uses fertilizers on landscaped areas, applied according to manufacturer labels and not directly before a rain event. Use and disposal of pesticides is tracked and overseen by Camp Murray's Integrated Pest Management Plan and the Air Guard's Integrated Pest Management Plan.

Grass clippings and vegetation are collected in green debris dumpsters and composted offsite. Woody debris is directly removed off site.

8.1.6 Material Storage Facilities and Heavy Equipment Maintenance or Storage Yards

Four areas on Camp Murray store materials and heavy equipment: State Maintenance Building 5, United States Property and Fiscal Office, Pierce County Readiness Center, and the Air National Guard Compound. Equipment in proper working condition and without leaks is stored in outside in fenced compounds. State Maintenance landscaping equipment is stored within Building 5. The Air National Guard maintenance equipment is stored in Building 115.

Equipment Maintenance

Preventative maintenance occurs through inspections for leaking fluids. Equipment needing maintenance or repair will immediately be sent to maintenance facilities. State Maintenance maintains vehicles in Building 5 on Camp Murray. Army National Guard Vehicles are sent to maintenance facilities on JBLM. The Air National Guard performs vehicle maintenance in building 102 on Camp Murray.

Equipment Washing

Cleaning of Army National Guard vehicles and heavy equipment is restricted to the vehicle maintenance shop located in the CSMS and UTES maintenance facilities at Joint Base Lewis McChord. If vehicles are cleaned on Camp Murray, they must be washed at engineered pads constructed for the purpose. The vehicle wash pad will extend a minimum of four feet on each side of any vehicles or pieces of equipment to be washed. Wash pads will be bermed or silled at least 4 inches in height to prevent washwater from leaving the pad and to prevent stormwater runoff from adjacent paved areas. Detergents are not used for vehicle or heavy equipment washing, including pressure or steam cleaning. Washing, pressure washing, and steam cleaning of vehicles, equipment, and building structures will generally follow Ecology BMP 2-64. The Air National Guard washes vehicles on a covered engineered wash rack. It is sloped to the middle to optimum water collection. Soap compatible with OWS operation is use, and washwater passes through the OWS prior to discharge to the sanitary sewer.

Oil Water Separators

Camp Murray has one oil-water separator located on the Air National Guard Compound. Fuel island pads within the compound are sloped to a central catchbasin/trench drain. It is plumbed with the horizontal drains in the Vehicle Maintenance bays and washrack, from which water passes through a sump tank before flowing through an oil-water separator and pump station to the JBLM sanitary sewer. The sump tank is inspected. Cleaning of the OWS occurs per manufacturer's recommendations. The oil-water separator is fitted with a block valve for emergency spill control.

Air National Guard's operations and maintenance for oil water separators follows the current 194th Wing Spill Prevention Control and Countermeasures Plan, dated April 2014 and the OWS manufacture's recommended maintenance program(s). Inspection of the Air National Guard oil-water separator follows the following schedule, as detailed in the Air National Guard facility Operations and Maintenance Plan.

- Quarterly – Inspected for presence of free product, sheen, foul odor; operation of valve, coalescer and pump.
- Semi-Annual – Inspected to determine solids level or blockage
- Annual – Inspected to determine the level of oils

Regular cleaning of oil-water separators is performed to keep accumulated oil and sediments from escaping during storms. Oil-water separators are cleaned when found to have a minimum of 6 inches of sludge and/or 2 inches of oil, per manufacturer recommendation. Coalescing plates or baffles may be cleaned in situ or after removal from the separator. Air Guard contracts for vacuum truck removal of oil, sludge, and wash water. Removed waste is properly contained and disposed of by the contractor. Wash water is replaced in the separator with clean water before returning it to service.

Two oil-water separators serving Army National Guard were decommissioned between 2010 and 2012 with the demolition of the Combined Service Maintenance Shop (CSMS), which was moved offsite to JBLM. Infrastructure of one of these oil-water separators is still in place behind Building 80. As it is not in service as an active oil-water separator, it is not serviced or inspected as such.

SPCC/SWPPP

Camp Murray's Stormwater Pollution Prevention Plan (SWPPP) and Spill Prevention, Control, and Countermeasure (SPCC) Plan, along with the Washington Air National Guard's 194th Wing Stormwater Pollution Prevention Plan (SWPPP) and Spill Prevention, Control, and Countermeasure (SPCC) Plan, have been developed and implemented to protect stormwater quality in the catchbasins that contain these material storage and heavy equipment activities. These documents are available upon request from WMD Environmental Office. The catchbasins covered in these plans require more stringent and frequent inspections for illicit discharge detection and best management practices.

Best Management Practices implemented as part of Camp Murray's Operation and Maintenance Plan are listed below and can be referenced in Section 10 of Camp Murray's SWPPP:

10.1 OPERATIONAL BMPS

10.1.1 Detecting and Permanently Removing Illicit Discharges

10.1.2 Positioning Existing and New Activities and Processes

10.1.3 Scheduling Existing and New Activities and Processes

10.1.4 Managing Preventive Maintenance of Pollutant Generating Activity

10.1.5 Managing Preventive Maintenance of the Stormwater Conveyance System

10.1.6 Good Housekeeping

10.1.7 Sweeping, Shoveling and Vacuuming Surfaces

10.1.8 Vehicle and Heavy Equipment Washing Stations

10.1.9 Designated Fuel Stations

10.1.10 Managing Storage of Generated Wastes and Fluids

10.1.11 Managing Disposal of Generated Wastes and Fluids

10.1.12 Preventing Spills and Establishing Emergency Response Procedures

10.1.13 Recordkeeping & Reporting

10.1.14 Training Personnel

10.1.15 Site Security

10.2 STRUCTURAL BMPS

10.2.1 Material and Fuel Unload and Load

10.2.2 Automotive and Heavy Equipment Repair and Maintenance

- 10.2.3 *Liquid Storage in Above-Ground Storage Tanks*
- 10.2.4 *Material Storage Piles*
- 10.2.5 *Container Storage of Liquids & Hazardous Wastes*
- 10.3 TREATMENT BMPS
 - 10.3.1 *Oil Water Separator*
 - 10.3.2 *Vegetated Swale*
 - 10.3.3 *Bio-Retention/Infiltration System*
- 10.4 IMPLEMENTATION AND MODIFICATION OF BMPS

A full list of inspections implemented as part of Camp Murray's Operation and Maintenance Plan are listed below and can be referenced in Section 11 of Camp Murray's SWPPP:

- 11.1 DRY WEATHER INSPECTION
- 11.2 WET WEATHER INSPECTION
- 11.3 SPILL AND LEAK INSPECTION
 - 11.3.1 *Reporting Spills and Leaks*
 - 11.3.2 *Spill and Leak Inspection*
- 11.4 LIQUID AND FLUID STORAGE TANKS INSPECTION
- 11.5 PIPING SYSTEM INSPECTION
- 11.6 LIQUID AND FLUID STORAGE TANK INSPECTION
- 11.7 LOADING AND UNLOADING INSPECTION
- 11.8 CATCH BASIN INSPECTION
- 11.9 OIL / WATER SEPARATOR INSPECTION
- 11.10 STORMWATER MONITORING
- 11.11 FACILITY UPDATES AND REPORTING

8.1.7 Other Facilities

WMD operates a campground and boat launch that may discharge stormwater in heavy storm events. RV users, campers, and boaters are informed about best management practices to reduce stormwater pollution through informational materials. The gravel parking lot is maintained to prevent runoff and informally inspected by camp hosts to detect any major leaks or spills. RV campsites are limited to a central area. A grassy buffer separates the RV lot from American Lake. Campers are encouraged to pick up pet waste and not feed geese to reduce nutrient runoff to American Lake.

8.2 Compliance with NPDES Industrial Stormwater Permit Requirements

Under current State regulations, Camp Murray is not required to apply for coverage under the NPDES Industrial Stormwater General Permit.

8.3 O&M Recordkeeping

The Environmental Office keeps records of wet weather illicit discharge and BMP inspections. State Maintenance keeps records and provides the environmental office with records of inspections and stormwater system preventative maintenance and repairs. Air Guard keeps records and provide the environmental office with records of inspections, oil-water separator maintenance and inspections, and stormwater system preventative maintenance and repairs. Records of spill incidents and reports are centrally maintained in the federal GKO system.

8.4 Staff Training

WMD conducts staff training to educate staff who, as part of normal maintenance, operations, or construction job responsibilities may impact stormwater quality. Staff training addresses the importance of protecting water quality, the requirements of the permit, operation and maintenance requirements, inspection procedures, best management practices to prevent or minimize water quality impacts, and procedures to report water quality issues, including illicit discharges and spills.

Currently, WMD conducts spill response, illicit discharge prevention, and stormwater best management practices training for Army National Guard during its Unit Environmental Compliance Officers (UECOs), held at least once a year on Camp Murray. Army National Guard Unit Environmental Compliance Officers (UECOs) are trained every two years in accordance with 40 CFR 122.34 and AR 200-1 and are the responsible party in their units for complying with environmental regulations at any duty location, including Camp Murray. Spill response training has also been incorporated in new employee orientation for federal and state employees.

The Air National Guard's spill response planning and training is conducted in accordance with current Federal (CFR), Air Force and Air National Guard (AFI), State (WAC), local, and the 194th WING Spill Prevention Control and Countermeasures Plan emergency spill response criteria, dated April 2014. Training is conducted at least annually. Air National Guard Unit Environmental Coordinators are provided additional training information and updates, as necessary. The Unit Environmental Coordinators are responsible for providing unit members with sustainment and additional training throughout the year in addition to the annual requirements.

Camp Murray staff involved in operations, maintenance, or construction projects include Air Guard Compound building managers, Air Guard Compound Maintenance Staff, Pierce County Readiness Center Building Managers, USPFO Building Managers, Camp Murray Maintenance staff, and the Camp Murray engineering office. Trainings specific for each groups' job duties are held on an annual basis. Training includes topics such as sustainability, stormwater pollution prevention, water quality management, spill response, waste management, disposal of dangerous and hazardous waste, and best management practices. Designated employees are also trained on appropriate inspection, record keeping, and maintenance procedures.

9.0 Exempt Requirements (TMDL and Monitoring)

9.1 Annual reports and records

At present, Camp Murray is not within the EPA approved TMDL list in Western Washington. No monitoring or reporting of TMDL is required at this time.

10.0 REPORTING REQUIREMENTS

10.1 Annual reports and records

No later than March 31st of each year an annual report describing the status of implementation of the requirements of the Permit will be submitted to the Washington State Department of Ecology. Report attachments will include an annually updated SWMP Plan and any new or supporting documentation developed during the reporting period. The annual report will also document any jurisdictional or administrative changes during the reporting period. These documents will be made available to the public and the records related to this permit will be kept for five years. Reports and submittals are certified by Rowena Valencia-Gica, Environmental Program Manager, Washington Military Department (rowena.valencia-gica@mil.wa.gov). Submittals are made online via the Washington State Department of Ecology's Water Quality Permitting Portal and delivered to the following agency:

Department of Ecology Water Quality Program
Municipal Stormwater Permits
PO Box 47696
Olympia, WA 98504-7696

11.0 Spill Response Procedures

A spill can be a one-time event, a continuous leak, or a frequent small leak. Leaks and spills of solid and liquid will be promptly contained and cleaned up.

In order to reduce the potential for spills and leaks the following practices and procedures have been implemented:

- Clearly label all containers that contain pollutant generating materials or waste.
- Place appropriate signs in areas to provide directions on what to do in the event of a spill or release including the list of telephone numbers to call.
- Store and transport liquid materials in appropriate containers with tight fitting lids.
- Store potentially leaky equipment indoors where feasible.
- Drain liquid and fluid materials from equipment and vehicle lines, tanks and vessels prior to long term storage.
- Place drip pans or other appropriate temporary containment devices where materials are

likely to spill or leak, such as petroleum or bulk liquid transfer operations, filters, or under leaky vehicles and heavy equipment.

- Use tarpaulins, ground cloths, or drip pans in areas where materials are mixed, carried, and applied to capture any spilled materials.
- Train employees on the safe techniques for handling pollutant generating materials that are used or stored on the site.
- Toxic chemical liquids, fluids, and petroleum products, including fuels will be stored in containers that are in good condition and in an area that is inspected frequently.
- Do not leave or lock “shut off” transfer nozzles in the open position. Do not top off tanks or vessels during fueling.
- Block, plug or cover storm drains that receive runoff from areas when transferring fuels or bulk liquids.
- Follow other guidance provided in facility plans and flowcharts such as:
 - 1) 194 WING Spill Prevention, Control and Countermeasures Plan – April 2014
 - 2) Installation Contingency Plan and Spill Prevention, Control and Countermeasure Plan, Emergency Response Procedures – 2017.
 - 3) Emergency Response Notification and Spill Response Flowchart (APPENDIX A)

Spill Kits

Spill cleanup kits are located within about 25 feet from areas with a high potential for spills and significant leaks so that they are easily accessible in the event of a spill. Spill kits are placed near stationary fueling (diesel) and mobile fueling or next to bulk liquid storage units (i.e. saddle tanks affixed to off-road vehicles, emergency generators, and heavy equipment). The contents of the spill kit are selected based on the types and quantities of materials stored or used in the area and will be re-stocked when the materials are used up. At a minimum spill kits will include:

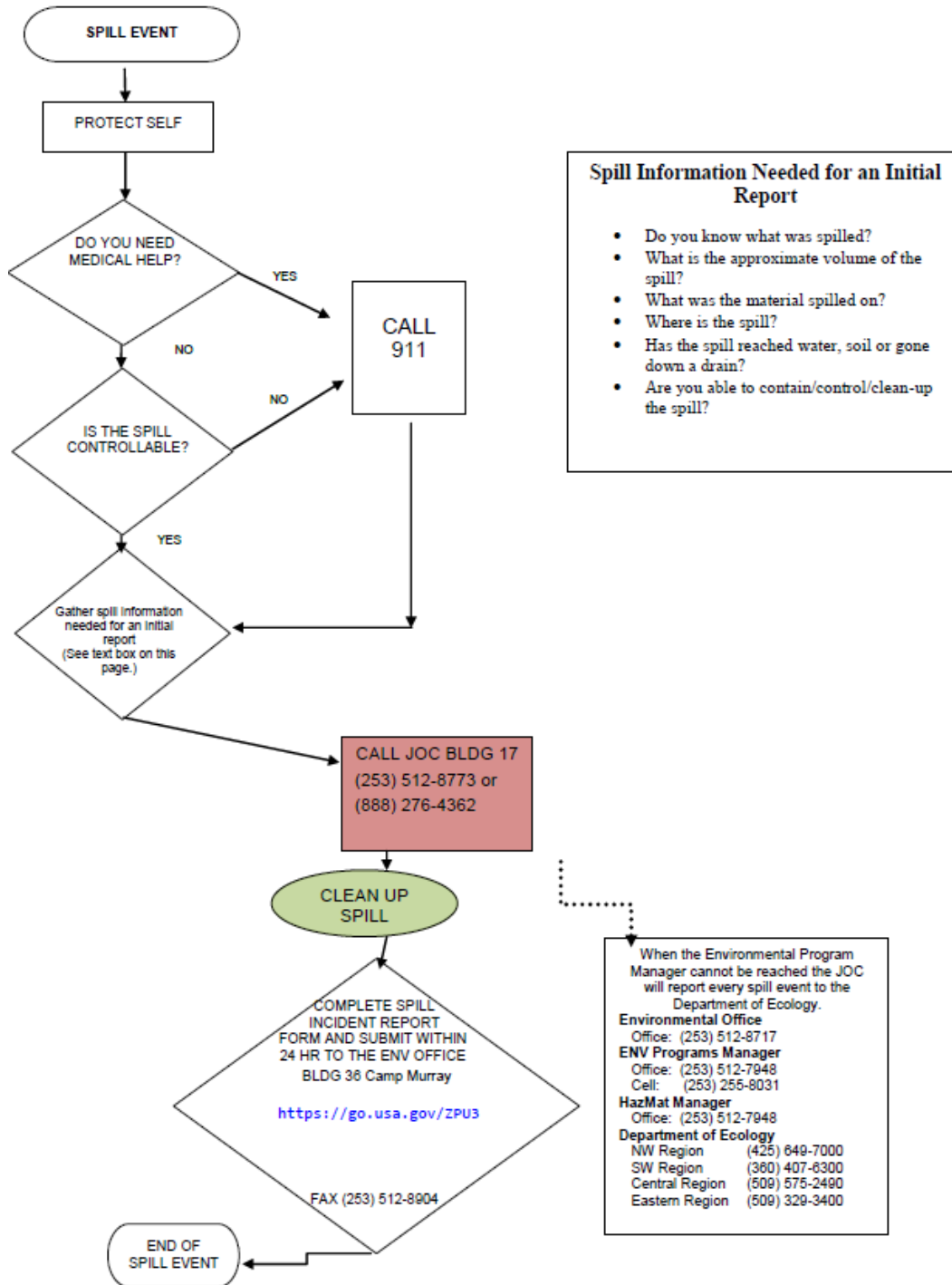
1. Oil absorbents capable of absorbing 15 gallons of fuel or liquid
2. Stormwater drain and catch basin plug or cover kit
3. Non-water absorbing containment boom, at a minimum of 10 feet in length, with a 12 gallon absorbent capacity
4. Non-metallic shovel
5. Two empty, five gallon buckets with lids
6. Labels for identifying the contents in the buckets

Spill Reporting

After the JOC is called, a spill report form is completed and sent to the Environmental Section. An after action report is submitted to the Environmental Section. The Environmental Section fulfills additional agency reporting, if necessary. Additional information pertaining to the facility’s spill prevention planning is referenced in APPENDIX A.

Appendix A. Spill Response Flow Chart and Reporting Form

EMERGENCY RESPONSE NOTIFICATION AND SPILL RESPONSE FLOWCHART



SPILL INCIDENT REPORT

Submit spill report to the DFG Environmental Office after initial cleanup has been completed and within 24 hours. Contact information is at the end of this form.

1. **FACILITY NAME:** _____
ADDRESS: _____
CITY or TOWN: _____
NEAREST HIGHWAY or INTERSECTION: _____
2. **DATE AND TIME OF INCIDENT:** _____
3. **NAME AND TEL. NUMBER OF ON-SCENE CONTACT:** _____
4. **SEVERITY OF THE INCIDENT:** Spill Fire Explosion Other _____
a. Name of Spilled Material: _____
b. Total Amount Spilled (lbs, gal): _____
c. Amount Recovered (lbs, gal): _____
d. Fate of Recovered Materials (i.e., oil, water, soil, absorbents): _____
 Facility Evacuated Injuries: _____ Spill Team Activated Photos
5. **SIGNIFICANT AREAS AFFECTED BY THE SPILL:** (Indicate location of any of the following affected areas, and estimate amount spilled in or on each area). **Affected Area (sq ft):** _____
 Building Area Surface Water

SPECIFICS

 Floor Drains Storm Drains
 Drainage Ditches Soil or Gravel Surfaces
6. **LOCAL TERRAIN CONDITIONS:** (Check off most appropriate description).
 Flat: (no significant slope) Somewhat Flat: (1-5% slope) Gently Rolling: (5-10% slope)
 Sharply Rolling: (10-20% slope) Steep: (>20% slope)
7. **WEATHER CONDITIONS:** (Check off most appropriate condition).
 Dry Fog or Drizzle Rain Snow Other
8. **CAUSE AND SOURCE OF INCIDENT:** (Check off most appropriate choice and give a brief description of the problem): _____

- Equipment Failure Accident Human Error Other
9. **OFFICES NOTIFIED:** (Check-off the offices that were notified and the name of the person who took the report over the telephone).
 WAAEING CFMO/ENV Office WA DOE

Name: _____
Org: _____
Position: _____
Phone: _____

 Emergency Operations Center JOC

Name: _____
Org: _____
Position: _____
Phone: _____

 National Response Center Other
10. **FUTURE PREVENTION:** (Note any equipment repairs or other measures taken to prevent recurrence): _____

Submit this form to the DFG Environmental Office within 24 hours.

Phone: (253) 512-8717 (call for an email address)

Fax: (253) 512-8904

Submit in person at Building 36 on Camp Murray.

Or complete the form online at: <http://milenviro/ems/Lists/Spill%20Report%20Form/AllItems.aspx>