



Focus on Municipal Stormwater Permit Guidance for Secondary Permittees: School Districts

from Ecology's Water Quality Program

How do I know if the municipal stormwater permit covers my school district?

School districts often have school, administrative and maintenance buildings at different locations in a city or county. This guidance refers to each of these locations as a “campus” if the buildings are on a contiguous piece of land. You must apply for permit coverage if your school district:

- Meets the conditions for a secondary permittee described in the sidebar on the left,

AND

- Has at least one campus that serves more than 1,000 people on an average day, determined as the average annual student enrollment, plus staff.

If one of your campuses grows to serve more than 1,000 people, you can amend your permit coverage to include that campus. You can do this at any point during the permit cycle, preferably through the annual report.

Even if only one or two campuses in your district requires direct coverage under this permit, the Washington Department of Ecology (Ecology) encourages you to manage stormwater at all of your campuses to the same level as those covered by the permit as a good environmental practice. If at any time Ecology staff determines that another campus is a significant contributor of pollution to surface water, staff can require that campus to come under the permit.

How do I apply for permit coverage?

You apply by sending Ecology a Notice of Intent (NOI) available at: <http://www.ecy.wa.gov/programs/wq/stormwater/municipal/secondary.html>

If your district is in a Phase I municipal stormwater permit community, you apply under the Phase I permit. In a Phase II community, you apply under either the Eastern or Western Phase II permit, depending on your location. You can find a list of these cities and counties at:

<http://www.ecy.wa.gov/programs/wq/stormwater/municipal/index.html>

Examples of coverage for different school districts

School District #1 has:

- Five elementary schools at different locations, each with fewer than 1,000 people.
- Two middle schools at different locations, one with 800 people and the other with 1,100 people.
- One high school campus with 1,400 people on an average day.



Secondary permittees are public entities such as school districts, ports, prison complexes, parks and recreation districts, colleges and universities, or diking and drainage districts that own or operate a stormwater sewer system located in a Phase I or Phase II city or county.

To obtain coverage under the permit, the special purpose district must meet these conditions at a minimum:

1. They must own or operate a municipal separate storm sewer system (MS4).

Continued next page

For school district #1, the permit does not cover the elementary schools and the first middle school because they have fewer than 1,000 people. The second middle school and the high school meet the criteria, so the school district NOI should include coverage of those two campuses.

School District #2 has:

- Two elementary schools at different locations, each with fewer than 1,000 people on an average day.
- One campus with both a middle school and high school. The middle school serves 900 people on an average day, and the high school serves 800 people.

In this scenario, the elementary schools do not need coverage because they each have fewer than 1,000 people on site on an average day. The permit covers the campus with the middle school and high school because the storm sewer system for that campus serves more than 1,000 people on an average day. The school district must submit an NOI for the middle and high school campus.

Our school district requires a permit. What do we need to do?

1. Decide whether you want to work with other permittees to satisfy your permit obligations. Ecology encourages coordination with other local permittees, either as co-permittees or through other agreements.¹
 - You can be a co-permittee with another secondary permittee, with the city or county, or with a group of other permittees.
 - You also can develop agreements to rely on another entity to meet some of the requirements. You can develop the agreement with other permittees or with entities like conservation districts.
 - You can be an individual permittee.
2. Submit an NOI to Ecology either individually or as a co-permittee. Ecology will send you a permit coverage letter and a copy of the permit. Read the permit, in particular Special Conditions 1, 2, 3, 4, 6, 7, and 9 and the General Conditions. You can find the NOI on Ecology’s permit web pages at <http://www.ecy.wa.gov/biblio/ecy070207.html>
3. Focus your attention on Section 6 of the permit, which covers the requirements for a Stormwater Management Program (SWMP) for secondary permittees.
 - Ecology wrote these requirements for a variety of entities in addition to school districts, including ports, universities and drainage districts. You need to decide how to apply them to the regulated part of your system. This focus sheet can help you, but please contact Ecology staff if you still have questions. Please see the contact information at the end of this document.
 - Write and carry out a Stormwater Management Plan (SWMP) following S6 of the permit. A SWMP describes how you meet the permit requirements. You must update it each year and send it to Ecology with your annual report. (S6.A)

¹ Permit Section 1.D.1.b defines co-permittee as the operator of a regulated MS4 “...that is applying jointly with another applicant for coverage under this permit. Co-Permittees own or operate a regulated small MS4 located within or adjacent to another regulated small MS4.” In Section 1.D.3 the permit describes how to apply as co-permittees and how to include an agreement with another entity.

The MS4 is a conveyance, or system of conveyances that includes roads with drainage systems, public streets, catch basins, curbs, gutters, ditches, fabricated channels or storm drains that are:

- Owned or operated by a public entity such as a city, town, county or special purpose district established by the state.
- Designed or used for collecting and carrying stormwater.
- Not a combined sewer system that carries both sewage and stormwater.
- Not part of a publicly owned wastewater treatment works, or sewer treatment plant.

2. The special purpose district is located in a city, or an unincorporated county or part of a county covered by a Phase I or Phase II permit.

3. The MS4 serves an average daily population of more than 1,000 people.

4. The MS4 discharges to surface waters.

OR

Ecology can require coverage for any special purpose district if Ecology determines that it is a significant contributor of pollution to surface waters.

Begin to prepare a SWMP document that describes how you:

- Coordinate with the city and county and any other public entities connected with your municipal separate storm sewer system (MS4).
- Establish through the school board the legal authorities to regulate and manage stormwater (S6.C).
- Keep records of your activities to meet the permit requirements and deadlines. The Annual Report form can help you plan your recordkeeping (S9 and Appendix 4).
- Develop and carry out the program elements in S6.D.

What programs make up the school district's Stormwater Management Plan?

1. Public education and outreach (S6.D.1)

Each permittee must conduct public education and outreach. You must label your storm drain inlets. You may be able to borrow the equipment for this from the city or county. Students at some schools may be able to carry out stormwater education activities as class projects. You also may collaborate with the local city or county or another entity to reach students and their parents. Ecology has links to education resources on its website.

2. Public involvement and participation (S6D.2)

After you prepare your SWMP, you must update it every year. The SWMP shows the public and Ecology what you are doing to manage stormwater. You must inform the community when the school district reviews the SWMP and allow the public an opportunity to provide input. You must make the SWMP available to the public and post it on your website if you have one.

3. Illicit Discharge Detection and Elimination (S6.D.3) ²

Schools have many possible sources of stormwater pollution, including:

- Oil, grease and metals on parking lots.
- Fertilizers, pesticides and herbicides.
- Materials stored in wood and metal shops.
- Waste from cafeterias, vehicle washing, or other activities.

The permit requires you to establish and enforce policies to prohibit illicit discharges to the stormwater system. You must train staff to map and inspect the storm sewer system to find and address spills and other illicit discharges. Maintenance staff may do some of these things already.

4. Construction Site Runoff Control and Post-Construction Stormwater Management (S6.D.4 and 5) These two sections require you to follow local city or county ordinances and regulations and to comply with the state construction stormwater permit for any new qualifying construction projects. See the following website for more information about the Construction Stormwater General Permit:

<http://www.ecy.wa.gov/programs/wq/stormwater/construction/>

5. Pollution Prevention and Good Housekeeping for Municipal Operations (S6D.6)

Operations and maintenance staff must inspect and clean the stormwater system on routine schedules. The permit requires you to maintain the facility to prevent pollution from roads and parking lots, vehicle fleets, external building maintenance, parks and open space, material storage and other activities. Requirements include training staff and keeping records of activities. Many school districts already have maintenance programs and can build on these.

² The permit defines an illicit discharge as "...any discharge to a municipal separate storm sewer that is not composed entirely of stormwater except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from fire fighting activities."

You may contact the following Ecology staff if you have questions about permit coverage or requirements for your school district:

<i>Island, Skagit and Whatcom Counties</i>	Christina Maginnis cmag461@ecy.wa.gov	360-715-5212
<i>Phase II Cities within Kitsap and Snohomish Counties</i>	Sarah Davenport-Smith sada461@ecy.wa.gov	425-649-7263
<i>Phase I Permittees (City of Seattle, King and Snohomish Counties)</i>	Rachel McCrea rmcc461@ecy.wa.gov	425-649-7223
<i>Phase II Cities within King County</i>	Anne Dettelbach adet461@ecy.wa.gov	425-649-7093
<i>Clallam and Pierce Counties</i>	Alison Chamberlin acha461@ecy.wa.gov	360-407-0245
<i>Clark, Cowlitz, Grays Harbor, Lewis, and Thurston Counties</i>	Greg Winters gwin461@ecy.wa.gov	360-690-7120
<i>Benton, Chelan, Douglas, Kittitas, and Yakima Counties</i>	Terry Wittmeier twit461@ecy.wa.gov	509-574-3991
<i>Asotin, Franklin, Grant, Spokane, Walla Walla, and Whitman Counties</i>	Dave Duncan ddun461@ecy.wa.gov	509-329-3554

If you need this publication in an alternate format, please call the Water Quality Program at 360-407-6401. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.