



# Water Quality Program

## Permit Submittal Electronic Certification

**Permittee:** FEDERAL WAY CITY

**Permit Number:** WAR045516

**Site Address:** 33530 1ST WAY S  
FEDERAL WAY, WA98063-9718

**Submittal Name:** MS4 Annual Report Phase II Western

**Version:** 1

**Due Date:** 3/31/2025

### Questionnaire

| Number | Permit Section | Question                                                                                                                                                                                                                                               | Answer                                             |
|--------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| 1      | S9.D.6         | Attach a map of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.                                                 | Not Applicable                                     |
| 2      | S5.A.2; S9.D.1 | Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2; S9.D.1)                                                                                                                                                                 | Attachment 1 - FINAL 2024-25<br>S_2_03262025093455 |
| 3      | S5.A           | Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.                                                                                                     | Yes                                                |
| 4      | S5.A.5.b       | Continued to coordinate among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)                                                                                                                               | Yes                                                |
| 5      | S9.D.4         | If applicable, identify other entities relied on to satisfy any of the obligations under the Permit. (S9.D.4)                                                                                                                                          | Not Applicable                                     |
| 6      | S5.C.1.a       | Continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of the stormwater planning program? (S5.C.1.a.)                                                                                         | Yes                                                |
| 12     | S5.C.1.c.i     | Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually) | Yes                                                |
| 13     | S5.C.1.c.i(a)  | From the assessment described in S5.C.1.c.i (a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)                                                                       | No                                                 |
| 19     | S5.C.2         | Did you choose to adopt one or more elements of a regional program? (S5.C.2)                                                                                                                                                                           | Yes                                                |

|     |              |                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                              |
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| 19a | S5.C.2       | If yes, list the elements, and the regional program.                                                                                                                                                             | City of Federal Way staff co-branded education and outreach materials, Facebook posts, and e-newsletter content with the regional Puget Sound Starts Here campaign. The South Sound Collaboration with some of shared outreach materials. Towards the end of the year we started coordinating with the regional Adopt a Drain meetings.                                                      |
| 20  | S5.C.2       | Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.                                                                                  | Attachment 2 - Pub Ed Activiti_20_03262025093947                                                                                                                                                                                                                                                                                                                                             |
| 24  | S5.C.2.a.iii | Provided, partnered, or promoted stewardship opportunities to encourage resident participation in activities such as those described in S5.C.2.a.iii.                                                            | Yes                                                                                                                                                                                                                                                                                                                                                                                          |
| 24a | S5.C.2.a.iii | Attach a list of stewardship opportunities provided.                                                                                                                                                             | Attachment 3 - Pub Ed Stewards_24a_03262025093947                                                                                                                                                                                                                                                                                                                                            |
| 25  | S5.C.3.a     | Describe in Comments field the opportunities created for the public to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. | Opportunities for public participation and comment involving the Stormwater Management Program (SWMP) and Stormwater Management Action Plan (SMAP) were available at the Land Use and Transportation Committee and City Council meetings when the SWMP and Annual Report are reviewed. We take comments on the SWMP, SMAP, and Annual Report all perpetually on our "NPDES Program" webpage. |

|     |            |                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 25a | S5.C.3.a.i | Describe specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities. (S5.C.3.a.i) | The City reached out to overburdened communities by advertising the Public Comment period in 8 languages. Oral translations of the plans are available upon request. In 2025, staff will research existing databases such as WA DOH health disparity map and EPA's EJ screen to identify overburdened and highly impacted communities in Federal way and devise a plan to reach those communities.                                    |
| 26  | S5.C.3.    | Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)                                                                | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 26a | S5.C.3.    | List the website address in Comments field.                                                                                                                           | <a href="https://www.federalway.wa.gov/page/npdes-program">https://www.federalway.wa.gov/page/npdes-program</a>                                                                                                                                                                                                                                                                                                                       |
| 27  | S5.C.4.    | Maintained an electronic map of the MS4 including the requirements listed in S5.C.4.?                                                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 32  | S5.C.5.b   | Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. (S5.C.5.b)                | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 32a | S5.C.5.b   | Describe actions in Comments field. (S5.C.5.b)                                                                                                                        | Environmental Services (ES) utilizes its Public Education and Outreach Program to inform staff, residents, and businesses about hazards associated with illicit discharges. Examples of outreach methods used include: e-newsletters, staff training, public workshops, a spill kit program for multicultural businesses, annual business inspections, mailings, tabling at community events and participation in regional campaigns. |
| 33  | S5.C.5.c   | Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.                           | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 35  | S5.C.5.d.i | Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.                                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| 35a | S5.C.5.d.i    | Cite field screening methodology in Comments field.                                                                                                                                                                                                                                                                                         | The City utilizes the Federal Way's 2024 Illicit Discharge Detection and Elimination Field Procedures and Response Plan, which references the following two guidance documents: Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments, Center for Watershed Protection; and, the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual, King County, Herrera. |
| 36  | S5.C.5.d.i(a) | Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)                                                                                                                                                                                                               | 49.8                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 36a | S5.C.5.d.i(a) | Cite field screening techniques used to determine percent of MS4 screened.                                                                                                                                                                                                                                                                  | We take the number of public catch basins/inlets and divide it by number of catch basins and inlets inspected.                                                                                                                                                                                                                                                                                                                                                 |
| 37  | S5.C.5.d.ii   | Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)                                                                                                                                                                                     | The spill reporting hotline is publicized on the City's website and through the monthly e-newsletter. The City also has an app called Eyes on Federal Way that allows the public to report issues in the City right from their phones.                                                                                                                                                                                                                         |
| 38  | S5.C.5.d.iii  | Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.                                                                                                                                                                                                                                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 39  | S5.C.5.e      | Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.                                                                                                                                                                                                                          | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 40  | S5.C.5.f      | Implemented an ongoing illicit discharge training program for all staff responsible for implementing the procedures and program described in S5.C.5.f.                                                                                                                                                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 41  | S5.C.5.g      | Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 13. | Attachment 4 - 20250212151716l_41_0 3262025094406                                                                                                                                                                                                                                                                                                                                                                                                              |

|     |                                          |                                                                                                                                                                                                                      |                                                 |
|-----|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| 42  | S5.C.6.b.i-iii                           | Continued to implement an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.                 | Yes                                             |
| 44  |                                          | Does the ordinance or other enforceable mechanism follow a Phase I program approved by Ecology (S5.C.6.b.i)?                                                                                                         | Yes                                             |
| 44a |                                          | If yes, state the title of the Stormwater Management Manual and which Phase I Program.                                                                                                                               | 2021 Surface Water Design Manual by King County |
| 45  | S5.C.6.b.i. and Section 5 of Appendix 1  | Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)                                                                                                   | 0                                               |
| 46  | S5.C.6.b.i., and Section 6 of Appendix 1 | Number of exceptions granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)                                                                                                   | 0                                               |
| 47  | S5.C.6.c.i                               | Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)                                                                         | Yes                                             |
| 47a | S5.C.6.c.i                               | Number of site plans reviewed during the reporting period.                                                                                                                                                           | 176                                             |
| 48  | S5.C.6.c.ii                              | Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii?                                                                                                                          | Yes                                             |
| 49  | S5.C.6.c.iii                             | Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.                                                  | Yes                                             |
| 49a | S5.C.6.c.iii                             | Number of construction sites inspected per S5.C.6.c.iii.                                                                                                                                                             | 184                                             |
| 49b | S5.C.6.c.iv                              | Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments at least twice per 12-month period with no less than 4 months between inspections, per S5.C.6.c.iv? | Yes                                             |
| 50  | S5.C.6.                                  | Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v)                    | Yes                                             |
| 51  | S5.C.6.                                  | Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)                                               | Yes                                             |
| 52  | S5.C.6.c.viii                            | Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects, per S5.C.6.c.ii-iv). (S5.C.6.c.viii)                         | 10                                              |
| 53  | S5.C.6.c.vi                              | Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)                                                                                                                                   | Yes                                             |

|     |             |                                                                                                                                                                                                                                                                                                                     |                                                     |
|-----|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
| 54  | S5.C.6.d    | Made online links to Ecology's Construction Stormwater General Permit Notice of Intent, the Industrial Stormwater General Permit Notice of Intent, and the registration requirements for Underground Injection Control (UIC) available to representatives of proposed new development and redevelopment? (S5.C.6.d) | Yes                                                 |
| 55  | S5.C.6.e    | All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities. (S5.C.6.e)                      | Yes                                                 |
| 56  | S5.C.7.b    | Attach a list of projects that are fully funded, started, completed and/or scheduled for implementation during this permit term for the purpose of meeting S5.C.7.b, with the information and formatting specified in Appendix 12. Attach an updated list annually. (S5.C.7.b,)                                     | Attachment 5 - Stormwater<br>Mana_56_03262025095154 |
| 57  | S5.C.8.b    | Updated inventory to identify institutional, commercial and industrial properties which have the potential to generate pollutants to the Permittee's MS4 per S5.C.8.b? (Required at least once every five years)                                                                                                    | Not Applicable                                      |
| 58  | S5.C.8.a-d  | Attach a summary of actions taken to implement the source control program, per S5.C.8.a-d.                                                                                                                                                                                                                          | Attachment 6 - Source Control<br>_58_03262025095243 |
| 59  | S5.C.8.d    | Attach a list of inspections, per S5.C.8.c.v, organized by the business category, noting the number of times each business was inspected and if enforcement actions were taken, per S5.C.8.d.                                                                                                                       | Attachment 7 - 2024 Source<br>Con_59_03262025095243 |
| 60  | S5.C.8.e    | Implemented an ongoing source control training program per S5.C.8.e?                                                                                                                                                                                                                                                | Yes                                                 |
| 61  | S5.C.9.a    | Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.9.a?                                                                           | Yes                                                 |
| 63  | S5.C.9.a    | Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? (S5.C.9.a)                                                                                                                                | Yes                                                 |
| 63a | S5.C.9.a.ii | If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.9.a)                                                                                                                                                                                                     | Modular Wetlands                                    |
| 64  | S5.C.9.a.ii | Verified that maintenance was performed per the schedule in S5.C.9.a.ii when an inspection identified an exceedance of the maintenance standard.                                                                                                                                                                    | No                                                  |
| 64a | S5.C.9.a.ii | Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.                                                                                                                                                                                                                | Not Applicable                                      |

|     |               |                                                                                                                                                                                                                                                   |                |
|-----|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| 65  | S5.C.9.b.i(a) | Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per S.5.C.9.b.i(a)?                                    | Yes            |
| 66  | S5.C.9.b.i(b) | Inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.9.b.i(b)                                                                                                                                      | Yes            |
| 66a | S5.C.9.b.i(b) | Are you using a reduced stormwater treatment and flow control BMPs/facilities inspection frequency?                                                                                                                                               | No             |
| 66b | S5.C.9.b.i(b) | If using a reduced inspection frequency on stormwater facilities regulated by the Permittee for the first time during this permit cycle, attach documentation per S5.C.9.b.i.(b).                                                                 | Not Applicable |
| 67  | S5.C.9.b.ii   | Achieved at least 80% of required inspections to verify adequate long-term O&M. (S5.C.7.b.ii)                                                                                                                                                     | Yes            |
| 68  | S5.C.9.c.i    | Annually inspected municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)                                                                                                                    | Yes            |
| 68a | S5.C.9.c.i    | Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.9.c.i)                                                                                                                                 | 578            |
| 68b | S5.C.9.c.i    | Number of facilities inspected during the reporting period.                                                                                                                                                                                       | 415            |
| 68c | S5.C.9.c.i    | Number of facilities for which maintenance was performed during the reporting period.                                                                                                                                                             | 93             |
| 69  | S5.C.9.c.i    | If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.9.c.i.                                                                                                                           | Not Applicable |
| 70  | S5.C.9.c.ii   | Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.                                                                                                          | Yes            |
| 71  | S5.C.9.c.iii  | Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.9.c.iii)                                                                                               | Yes            |
| 71a | S5.C.9.c.iii  | Number of known catch basins and inlets?                                                                                                                                                                                                          | 13144          |
| 71b | S5.C.9.c.iii  | Number of catch basins and inlets inspected during the reporting period?                                                                                                                                                                          | 6543           |
| 71c | S5.C.9.c.iii  | Number of catch basins and inlets cleaned during the reporting period?                                                                                                                                                                            | 1033           |
| 72  | S5.C.9.c.iii  | Attach documentation of alternative catch basin inspection approach for those owned or operated by the Permittee, if used, per S5.C.9.c.iii.                                                                                                      | Not Applicable |
| 73  | S5.C.9.d      | Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.9.d) | Yes            |

|    |                              |                                                                                                                                                                                                                                                                                                                                                             |                |
|----|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| 79 | S5.C.9.f                     | Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.9.f) | Yes            |
| 80 | S5.C.9.g                     | Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.9.g)                                                                                                                                                                               | Yes            |
| 81 | S7.A                         | Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)                                                                                                                                                                                                                                                    | Not Applicable |
| 82 | S7.A                         | For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)                                                                                                                                                                                                             | Not Applicable |
| 83 | S8.A.1, S8.A.2.a             | Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2024 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)                                                                                                                                            | Yes            |
| 84 | S8.A.2.a, S8.A.2.b           | Notified Ecology by December 1, 2024 which option you selected: S8.A.2.a, or S8.A.2.b.                                                                                                                                                                                                                                                                      | Yes            |
| 85 | S8.B.1, S5.B.2.a or S8.B.2.c | Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2024 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?                                                                                                                                             | Yes            |
| 86 | S8.B.2.a, or S8.B.2.b.       | Notified Ecology by December 1, 2024 which option you selected: S8.B.2.a, or S8.B.2.b.                                                                                                                                                                                                                                                                      | Yes            |
| 87 | S8.C.1.b and Appendix 9      | If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2025? (S8.C.1.b and Appendix 9)                                                                                                                                                                                              | Not Applicable |
| 89 | G3                           | Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)                                                                                                                                                                                   | Yes            |
| 90 | G3                           | Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.                                                                                                                                                                                                                                        | Yes            |
| 91 | Compliance with standards    | Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)                                                                                                                                                | Yes            |
| 92 | Compliance with standards    | If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.                                                                                                                                                                                                                                                                 | Not Applicable |
| 93 | Compliance with standards    | Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)                                                                                                                                              | Not Applicable |



|    |     |                                                                                                                                                                |                                                                                                                                                                                                                         |
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| 94 | G20 | Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)                   | Yes                                                                                                                                                                                                                     |
| 95 | G20 | Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field. | 1<br>Comment: Failure to provide S4.F.1 letter within 30 days of becoming aware of a discharge from the MS4 into receiving waters. Written notification was due June 2, 2024. The notice was submitted on June 7, 2024. |

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

Kevin Du

3/26/2025 10:34:39 AM

Signature

Date