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CITY OF KELSO

Public Works Department
203 S. Pacific Ave., Suite 205
PO Box 819
Kelso, WA 98626

April 5, 2013

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

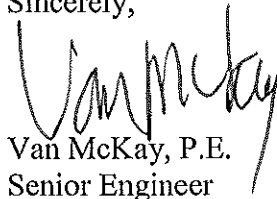
RE: 2012 Annual Report for Phase II NPDES Municipal Permit

Dear Sir/Madam:

The City of Kelso is permitted under the NPDES Western Washington Phase II Municipal Stormwater Permit Number WAR045010. One of the requirements of the permit (Section S9) is to submit by March 31, 2013 the 2012 Annual Report. The Kelso 2012 Annual Report submittal includes the annual report forms, the City's Stormwater Management Program (SWMP) and correspondence with Ecology. An electronic copy of this Annual Report was sent out by email today to PH2_WAnnRpt@ecy.wa.gov.

If you have any questions, please contact me at 360-423-6590.

Sincerely,



Van McKay, P.E.
Senior Engineer

Attachments: Kelso 2012 Annual Report
SWMP
April 6, 2012 G20 non-compliance letter
October 17, 2012 G20 correction letter

I. Permittee Information					
Permittee Name City of Kelso	Permittee Coverage Number WAR045010				
Contact Name Van McKay, P.E.	Phone Number 360-423-6590				
Mailing Address P.O. Box 819					
City Kelso	<table border="1"> <thead> <tr> <th>State</th> <th>Zip + 4</th> </tr> </thead> <tbody> <tr> <td>WA</td> <td>98626-0078</td> </tr> </tbody> </table>	State	Zip + 4	WA	98626-0078
State	Zip + 4				
WA	98626-0078				
Email Address vmckay@kelso.gov					

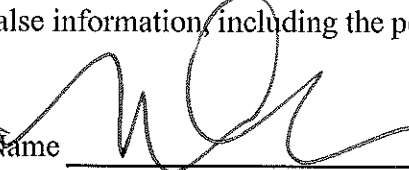
II. Regulated Small MS4 Location										
Jurisdiction City of Kelso	<table border="1"> <thead> <tr> <th colspan="3">Entity Type: Check the box that applies</th> </tr> <tr> <th>County</th> <th>City/Town</th> <th>Other</th> </tr> </thead> <tbody> <tr> <td></td> <td>X</td> <td></td> </tr> </tbody> </table>	Entity Type: Check the box that applies			County	City/Town	Other		X	
Entity Type: Check the box that applies										
County	City/Town	Other								
	X									
Major Receiving Water(s) Cowlitz and Coweeman Rivers										

III. Relying on another Governmental Entity	
<p>If you are relying on another governmental entity to satisfy one or more of the permit obligations, list the entity and briefly describe the permit obligation(s) they are implementing on your behalf below. <i>Attach a copy of your agreement with the other entity to provide additional detail.</i></p>	
Name of Entity:	Permit Obligation(s):

IV. Certification

All annual reports must be signed and certified by the responsible official(s) of permittee or co-permittees. Please print and sign this page of the reporting form and mail it (with an original signature) to Ecology at the address noted below. An electronic signature will not suffice.

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 gathered and evaluated 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 willful violations.

Name 	Title City Engineer	Date 4.5.13
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____

PLEASE indicate reporting year and your jurisdiction in Line 1, above.

PLEASE refer to the INSTRUCTIONS tab for assistance filling out this table.

NOTE: For clarification on how to answer questions, place cursor over cells with red flags.

NOTE: Please answer all questions.

PLEASE review your work for completeness and accuracy. Save this worksheet as you go!

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
1. Attached annual written update of Permittee's Stormwater Management Program (SWMP), including applicable requirements under S5.A.2 and S9?	Y		Attached SWMP also found online at http://stormwater.kelso.gov . Updates include the Executive Summary and catch basin inspections in section S5.C.5.	City of Kelso Phase II Municipal Stormwater Management Program (SWMP)
2. Attached a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period, and implications for the SWMP as per S9.E.3?	NA		No annexations within the City of Kelso in 2012.	
3. Implemented an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation and permit compliance and to set priorities? (S5.A.3)	Y		The City uses computer software for implementing the SWMP and continues to refine the system and program.	
4. Tracked costs or estimated costs of the development and implementation of the SWMP? (S5.A.3.a)	Y		Cost tracking includes staff time, educational materials, public works, contractor and consultant costs.	
5. SWMP includes an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff and other employees of the Permittee? (S5.C.1)	Y			

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
6.	Number of public education and outreach activities implemented:		3	Contributions for Earth Day and FIN the giant salmon. Creation of a Stormwater Outreach Group with local permittees. Educational letter in utility mailing.	
7.	Provided opportunities for the public to participate in the decision making processes involving the development, implementation and updates of the Permittee's SWMP? (S5.C.2.a)	Y		Opportunities have been provided through City Council meetings as well as the Kelso Stormwater Advisory Committee meetings. The Stormwater Management Program is posted on the City's website.	
8.	Implemented a process for public involvement and consideration of public comments on the SWMP? (S5.C.2.a)	Y		Opportunities have been provided through City Council meetings as well as the Kelso Stormwater Advisory Committee meetings. The Stormwater Management Program is posted on the City's website.	
9.	Made the most current version of the SWMP available to the public. (S5.C.2.b)	Y		Revisions made to reflect the 2012 to 2013 permit. Posted to the City's website.	
10.	Posted the SWMP and latest annual report on Permittee's website. (S5.C.2.b)	Y		Posted to the City's website.	
11.	NOTE website address in <i>Attachment</i> field:	Y		Website attached	http://stormwater.kelso.gov
12.	Maintained a map of your MS4, including requirements listed in S5.C.3.a.i-iii?	Y		The City continues to maintain its stormwater drainage system map. See at http://stormwater.kelso.gov .	
13.	Map has been made available upon request? (S5.C.3.a.iv)	Y			
14.	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4? (S5.C.3.b)	Y		An illicit discharge ordinance was adopted August 18, 2009. See at http://stormwater.kelso.gov .	
15.	Implemented an ongoing program to detect and address non-stormwater illicit discharges, including spills, and illicit connections into the Permittee's MS4? (S5.C.3.c)	Y		The City maintains an IDDE log on investigations, actions and enforcements. Also, procedures are found in the City's Municipal Stormwater IDDE Program found at http://stormwater.kelso.gov .	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
16. Implemented field assessment activities, including visual inspection of priority outfalls identified during dry weather, and for the purposes of verifying outfall locations, identifying previously unknown outfalls, and detecting illicit discharges. (S5.C.3.c.ii)	Y		Field assessments were conducted on Tam O'Shanter, Baker Way and Coweeman Sloughs	
17. Conducted field assessments on at least one high priority water body? (S5.C.3.c.ii)	Y		Field assessments were conducted on Tam O'Shanter, Baker Way and Coweeman Sloughs	
18. Implemented procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee? (S5.C.3.c.iii)	Y		Procedures are found in the City's Municipal Stormwater IDDE Program found at http://stormwater.kelso.gov .	
19. Implemented procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures? (S5.C.3.c.iv)	Y		Procedures are found in the City's Municipal Stormwater IDDE Program found at http://stormwater.kelso.gov .	
20. Implemented procedures for removing the source of the discharge, including notification of appropriate authorities; notification of the property owner; technical assistance for eliminating the discharge; follow-up inspections; and escalating enforcement and legal actions if the discharge is not eliminated? (S5.C.3.c.v.)	Y		Procedures are found in the City's Municipal Stormwater IDDE Program found at http://stormwater.kelso.gov .	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
21.	Provided updated information to public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste? (S5.C.3.d)	Y			
22.	Distributed appropriate information to target audiences identified pursuant to S5.C.1? (S5.C.3.d.i)	Y			
23.	Publicized and maintained a hotline or other local telephone number for public reporting of spills and other illicit discharges? (S5.C.3.d.ii)	Y			
24.	Number of hotline calls received:		10	Calls are entered into the Kelso IDDE log and information includes investigation, education and enforcement.	
25.	Number of follow-up actions taken in response to calls:		10		
26.	NOTE hotline number in <i>Comments</i> field	y		(360) 423-6590 and Kelso/Longview (360) 578-0900.	
27.	Number of illicit discharges identified (S5.C.3.e):		6		
28.	Number of inspections made for illicit connections (S5.C.3.e):		0	Hotline calls not related to illicit connections.	
29.	Municipal field staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections are trained to conduct these activities? (S5.C.3.f.i)	Y			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
30. Implemented an ongoing training program on the identification of an illicit discharge/connection, and on the proper procedures for reporting and responding to the illicit discharge/connection for all municipal field staff, which, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system? (S5.C.3.f.ii.)	Y			
31. Applied stormwater runoff program to private and public development, including roads? (S5.C.4)	Y		The program includes the Stormwater Management Ordinance No. 10-3727 and the Kelso Engineering Design Manual (KEDM).	
32. Applied the Technical Thresholds in Appendix 1 to all sites 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? (S5.C.4)	Y		The program includes the Stormwater Management Ordinance No. 10-3727 and the Kelso Engineering Design Manual (KEDM).	
33. Implemented a regulatory mechanism (such as an ordinance) necessary to address run-off from new development, redevelopment and construction site activities? (S5.C.4.a)	Y		The program includes the Stormwater Management Ordinance No. 10-3727.	
34. Retained existing local requirements to apply stormwater controls at smaller sites or at lower thresholds than required pursuant to S5.C.4? (S5.A.4)	Y		The program includes the Stormwater Management Ordinance No. 10-3727.	
35. Number of exceptions to the minimum requirements in Appendix 1 granted (S5.C.4.a.i and Appendix 1)?		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
36. Number of variances to the minimum requirements in Appendix 1 allowed (S5.C.4.a.i and Appendix 1)?		0		
37. Implemented a permitting process to address runoff from new development, redevelopment and construction site activities with plan review, inspection, and enforcement capability? (S5.C.4.b)	Y		The program includes the Stormwater Management Ordinance No. 10-3727 and the Kelso Engineering Design Manual (KEDM).	
38. Reviewed Stormwater Site Plans for new development and redevelopment projects that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of development or sale? (S5.C.4.b.i)	NA		No projects over 1 acre submitted during permit period.	
39. Number of site plans reviewed during the reporting period:		0		
40. Inspected, prior to clearing and construction, all known development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Potential? (S5.C.4.b.ii and v)	NA		No projects over 1 acre submitted during permit period.	
41. Number of qualifying sites inspected prior to clearing and construction during the reporting period:		0		
42. Inspected construction-phase stormwater controls at all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls? (S5.C.4.b.iii and v)	NA		No projects over 1 acre submitted during permit period.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
43. Number of sites inspected during the construction phase for the reporting period:		0		
44. Based on inspections at new development and redevelopment construction projects, enforced requirements related to the proper installation and maintenance of erosion and sediment controls? (S5.C.4.b.iii and vi)	NA		No projects over 1 acre submitted during permit period.	
45. Number of enforcement actions taken during the reporting period:		0		
46. Inspected qualifying permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs? (S5.C.4.b.iv and v)	NA		No projects over 1 acre submitted during permit period.	
47. Number of qualifying sites known during the reporting period:		0		
48. Number of qualifying sites inspected during the reporting period:		0		
49. Verified a maintenance plan is completed and responsibility for maintenance is assigned for qualifying permitted development sites (S5.C.4.b.iv)	NA		No projects over 1 acre submitted during permit period.	
50. Enforced regulations to ensure proper installation of permanent stormwater controls? (S5.C.4.b.iv)	NA		No projects over 1 acre submitted during permit period.	
51. Number of enforcement actions taken during the reporting period:		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
52. Implemented a long-term operation and maintenance (O&M) program for post-construction stormwater facilities permitted and constructed pursuant to S5.C.4.a. and b.? (S5.C.4.c)	Y			
53. Annually inspected all post-construction stormwater controls, including structural BMPs, at new development and redevelopment projects permitted according to S5.C.4.b. (unless maintenance records justify a different frequency)? (S5.C.4.c.iii)	NA		No projects over 1 acre since Phase II permit issuance.	
54. If using reduced inspection frequency, Attached documentation as per S5.C.4.c.iii?	NA		No projects over 1 acre since Phase II permit issuance.	
55. Performed timely maintenance of post-construction stormwater facilities and BMPs as per S5.C.4.c.ii?	NA		No projects over 1 acre submitted during permit period.	
56. Attached documentation of any maintenance delays. (S5.C.4.c.ii)	NA		No projects over 1 acre submitted during permit period.	
57. Inspected all new stormwater treatment and flow control facilities owned or operated, including catch basins, for new residential developments that are a part of a larger common plan of development or sale, every 6 months during the period of heaviest house construction (i.e., 1 to 2 years following subdivision approval) to identify maintenance needs and enforce compliance with maintenance standards as needed? (S5.C.4.c.iv)	NA		No projects over 1 acre submitted during permit period.	
58. Number of facilities inspected during the reporting period:		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
59. Implemented a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections and maintenance activities? (S5.C.4.d)	Y			
60. Provided copies of the Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity to representatives of proposed new development and redevelopment? (S5.C.4.e)	Y			
61. All staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement were trained to conduct these activities? (S5.C.4.f)	Y		Engineers and engineering technicians responsible for inspections are Certified Erosion and Sediment Control Lead (CESCL) trained.	
62. Performed timely maintenance as per S5.C.5.a.ii?	N		Inspection and maintenance was not performed on all catch basins by Feb. 15, 2012. A G20 letter was sent April 6, 2012 to Ecology regarding the delay. All catch basins were inspected and cleaned by September 28, 2012. A letter was sent October 17, 2012 stating City was in compliance.	
63. Attached documentation of any maintenance delays. (S5.C.5.a.ii)	Y			G20 notification letters, dated: April 6, 2012 and October 17, 2012

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
64. Implemented a program designed to annually inspect and maintained all stormwater treatment and flow control facilities (other than catch basins)? (S5.C.5.b)	Y			
65. Number of known facilities:		5		
66. Number of facilities inspected during the reporting period:		3		
67. If using reduced inspection frequency, Attached documentation as per S5.C.5.a.ii? (S5.C.5.b)	NA		City has not applied for reduced frequency.	
68. Conducted spot checks of stormwater facilities after major storms? (S5.C.5.c)	NA		No qualifying storm during reporting period.	
69. Number of known facilities:		5		
70. Number of facilities inspected during the reporting period:		0	No qualifying storm during reporting period	
71. Inspected 20% of municipally owned or operated catch basins at least once before the end of the Permit term? (S5.C.5.d and Permit Reference Table)	NA		Compliance not yet required.	
72. Number of known catch basins:		1403	The previous estimate of 1313 catch basins was revised up to 1403 as more catch basins were discovered during the cleaning project.	
73. Number of inspections:		1403		
74. Number of catch basins cleaned:		1403	All catch basins were cleaned regardless if they met the maintenance standards of the 2005 Stormwater Manual.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
75. Implemented practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads or highways owned or maintained by the Permittee, and road maintenance activities conducted by the Permittee? (S5.C.5.f)	Y		A minimum of 2,300 lineal feet of storm pipe was cleaned in 2012. Some other practices included street sweeping, ditch maintenance, road resurfacing and pavement striping maintenance.	
76. Implemented policies and procedures to reduce pollutants in discharges from all lands owned or maintained by the Permittee and subject to this Permit, including but not limited to: parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control facilities? (S5.C.5.g)	Y		Policies and procedures shown in documents such as the Nutrient, Integrated Pest Management and Herbicide Plan, the Operations Stormwater Pollution Prevention Plan (SWPPP) and the Municipal Stormwater Operations and Maintenance (O&M) Program.	
77. Implemented an operations and maintenance (O&M) training program that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (S5.C.5.h.)	Y			
78. 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 the Industrial Stormwater General Permit? (S5.C.5.i)	Y		The City implemented a Stormwater Pollution Prevention Plan for the Operations yard.	
79. Complied with the specific requirements associated with approved TMDLs identified in Appendix 2? (S7.A and Permit Reference Table)	NA		TMDL's have not been identified for surface waters to where the City's MS4 discharges.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
80. Attached status report of TMDL implementation? (S7.A and Permit Reference Table)	NA		TMDL's have not been identified for surface waters to where the City's MS4 discharges.	
81. Where monitoring was required in Appendix 2, did you conduct the monitoring according to an approved Quality Assurance Project Plan? (S7.A and Permit Reference Table)	NA		TMDL's have not been identified for surface waters to where the City's MS4 discharges.	
82. Notified Ecology immediately in cases where the Permittee becomes aware of a discharge from the Permittees MS4 which may cause or contribute to an imminent threat to human health or the environment? (G3)	NA		No qualifying discharges during 2012.	
83. Took appropriate action to correct or minimize discharges into or from the MS4 which could constitute a threat to human health, welfare, or the environment? (G3)	NA		No qualifying discharges during 2012.	
84. Attached a summary of the status of implementation of any actions taken pursuant to S4.F and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period? (S4.F.3.d)	NA		No S4.F.1 notifications submitted.	
85. Notified Ecology of the failure to comply with any permit term or condition within 30 days of becoming aware of the non-compliance? (G20)	N		April 6, 2012 G20 letter (see #71 comment) was not sent within 30 days of non-compliance. It was sent within 51 days of non-compliance.	

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part A for all annual reports.

NOTE: Please note in Row 1 of the table if you have no information to report.

NOTE: Please limit your entries to 255 characters per cell. You may include additional information in your Supplemental Documentation attachment and reference it below with the page number.

A. Information Collection

Briefly describe any stormwater monitoring, studies, or type of information collected and analyzed during the reporting period. (S8.B.1)	Who/how to contact for additional information?
1. NA: Stormwater monitoring, studies, or other information not required by	Van McKay, P.E.
2. permit and not performed in 2012.	
3.	
4.	
5.	
6.	

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part B for all annual reports.

B. SWMP Evaluation (S8.B & S9)

You are required to assess the appropriateness of the BMPs you have selected to implement your SWMP. This evaluation is necessary to evaluate whether the MEP standard set by the permit is protective of water quality in your receiving water bodies. This assessment may be entirely qualitative. Answer **NA** if you are not yet implementing BMPs for a component of the SWMP. (S8.B.2 and S9)

Question	Y/N/NA	Comments (50 word limit)
1. Are the BMPs selected and implemented for Public Outreach appropriate to minimize pollutants in the MS4 to the MEP?	Y	
2. Are the BMPs selected and implemented for Public Involvement appropriate to minimize pollutants in the MS4 to the MEP?	Y	
3. Are the BMPs selected and implemented for Illicit Discharge Detection and Elimination appropriate to minimize pollutants in the MS4 to the MEP?	Y	
4. Are the BMPs selected and implemented for Construction Stormwater Pollution Prevention appropriate to minimize pollutants in the MS4 to the MEP?	Y	
5. Are the BMPs selected and implemented for Post-Construction Runoff Management appropriate to minimize pollutants in the MS4 to the MEP?	Y	
6. Are the BMPs selected and implemented for Good Housekeeping for Municipal Operations appropriate to minimize pollutants in the MS4 to the MEP?	Y	

VII. Information Collection, BMP Evaluation, and Monitoring

Complete Part C for all annual reports.

C. Changes in BMPs or objectives (S8.B)

If any of the BMPs or objectives is being changed, list the old BMP and objective, the new BMP and objective, and a justification for the change below. (S8.B.2., and S9)

NOTE: You may choose to attach additional documentation justifying Changes in BMPs or objectives. Note such attachments in the *Justification for change* field.

Old BMP	Old Objective	New BMP	New Objective	Justification for Change
Stormwater pond at airport	Regular removal of weeds	NA	NA	Ownership/responsibility of pond changed from the City of Kelso to the Southwest Washington Regional Airport.
1				
2				
3				
4				
5				
6				
7				

**CITY OF KELSO PHASE II MUNICIPAL STORMWATER MANAGEMENT PROGRAM
(SWMP)**

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

Latest Update: 2012

PURPOSE

The purpose of this Stormwater Management Program (SWMP) Plan is to document the City of Kelso's efforts as required by the Western Washington Phase II Municipal Stormwater Permit (Permit). The City received coverage under this Permit by submitting a Notice of Intent (NOI) to the Washington Department of Ecology (Ecology) on January 2, 2007.

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EXECUTIVE SUMMARY

In 1987, Congress amended the federal Clean Water Act of 1972 and established water quality goals for surface waters (stormwater) of the United States. The National Pollutant Discharge Elimination System (NPDES) permit program is the mechanism under which these goals are implemented. The Environmental Protection Agency (EPA) administers the NPDES program nationwide and has delegated responsibility to administer the NPDES permit program to most states, including Washington.

The Clean Water Act established a two phase permit program. Phase I regulates larger and medium-sized municipalities and counties, construction site five acres or larger, and major industrial sources. Phase I was issued in 1995 to the cities of Seattle and Tacoma. In 1999, the counties of King, Pierce, Snohomish, and Clark also became regulated entities under the Phase I regulations.

Phase II regulates smaller jurisdictions, construction sites equal to or greater than one acre, and other industrial sources. In 2000, EPA finalized the NPDES Phase II rules regulating "small" municipal separate stormwater sewer systems (a.k.a. MS4s). On January 17, 2007, the Washington Department of Ecology (Ecology) issued a new Phase I and two new Phase II permits, one each for western and eastern Washington. The City of Kelso is now regulated as a MS4 under the western Washington Phase II permit.

These new requirements effectively prohibit non-stormwater discharges and require jurisdictions to apply controls to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP). Ecology is also using the permit to satisfy its own Water Pollution Control Act, RCW 90.48.

Phase II permits affect some 100 cities and 12 counties statewide, plus many other secondary and co-permittees such as diking districts, school districts, colleges, hospitals, and correctional facilities. Cities and counties covered by the permit must implement a Stormwater Management Program (SWMP). Requirements are specific and detailed with numerous compliance deadlines distributed over the five-year permit cycle and are shown in Table 1 below.

The Phase II permit program is structured around the following components:

- Public education and outreach program designed to measurably reduce stormwater pollution;

- Public involvement process to guide the development of the stormwater management program;
- Adoption of ordinances to control runoff from development, redevelopment, and construction activities;
- An illicit discharge detection and elimination (IDDE) program to identify and remove improper discharges into the storm sewer system; and
- An operation and maintenance program that reduces pollutant runoff from municipal operations.

Reporting requirements and detailed record-keeping are included to assess compliance and allow for making changes to improve water quality.

Permit obligations are legally binding and there are consequences for failure to comply with requirements. Ecology's approach to compliance during this first five-year permit cycle is technical assistance. However, the CWA allows third-parties (citizens) to take legal action against jurisdictions failing to comply. Violators may be subject to penalties of up to \$37,500 per day per violation.

The following SWMP Plan provides the public and Ecology with information about how the City of Kelso is implementing the various program requirements of the Phase II permit.

The Phase II permit expiration date was extended. Ecology reissued the permit unmodified on August 1, 2012 at legislative direction to be effective through July 31, 2013. Permittees are to continue implementation of their SWMP Plan during this extension. One main exception is a requirement to inspect twenty percent of the catch basins and inlets during the extension.

Ecology also reissued the updated 2013 to 2018 Phase II permit on August 1, 2012 and it will become effective August 1, 2013.

S5.C1 PUBLIC EDUCATION AND OUTREACH

The SWMP shall include an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff, operations staff, and other employees of the Permittee. The goal of the education program is to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. An education program may be developed locally or regionally and planned activities for public education and outreach are shown in Table 2 below.

PROGRAM GOALS

The goals of the City of Kelso's Stormwater Public Education Program are:

1. Increase Knowledge - To measurably increase the knowledge of the target audiences regarding the MS4, the impacts of storm water pollution on receiving waters, and potential solutions to mitigate the problems caused;
2. Change Behavior - To measurably change the waste disposal and runoff pollution generation behavior of target audiences by encouraging implementation of appropriate solutions;
3. Reach a Diverse Audience - To involve and engage a diverse audience in Kelso to participate in mitigating the impacts of storm water pollution; and
4. Implement a Public/Business/Employee Education Program That Meets Permit Requirements

Table 2: Public Education and Outreach: Planned Activities

Planned Activity	Due Dates
1 Evaluate existing public education/outreach activities	
2 Identify individual responsible for public education/outreach	
3 Conduct public education workshop	
Identify "gaps" in target audience	
Initiate framework for public education/outreach program	Ongoing with yearly review
Initiate development of measurable goal	
Conduct initial public opinion survey	
Evaluate results of public opinion survey	
4 Draft framework for public education program (including feedback mechanism)	
Prepare a formal education and outreach program document for submittal in the Annual Report	2/15/09
5 Initiate activities program defined in the public education and outreach program	
6 Initiate summary of yearly public education/outreach activities for the Annual Report	Annually

S5.C.1.a Education and Outreach

The City's stormwater program maintains a full time stormwater manager. Through the efforts of this manager, the City has built upon its existing stormwater education by enhancing its website, producing informational mailings of the Ecology stormwater permit (Phase II Municipal permit) requirements to utility customers, and labeling storm drains. City managers and Council members have received technical presentations from Ecology educating them on basic stormwater and water quality protection principles as well as the requirements and importance of the Phase II Municipal permit. The City Council has also received a technical presentation on the proposed illicit discharge detection and elimination and stormwater management ordinances which they later adopted.

The City, in cooperation with local jurisdictions, developed a citizen's guide to clean runoff that addressed public awareness of stormwater pollution. The contents of this brochure, *The Solution to Stormwater Pollution*, were developed around the results from a 2008 telephone survey that is described in section S5.C.1.b below. The brochure was mailed out in 2008 to Kelso citizens and businesses with utility service.

METHOD FOR DETERMINING TARGET AUDIENCE

- Demographic information, such as age, income, and education.
- Economic information, such as types of commercial or development activities.
- Land-use data, pet licenses, population density and home ownership statistics.

TARGET POLLUTANT

- Specific local pollution problems

PRIORITIZED TARGET AUDIENCES & BEHAVIORS

General Public

- General impacts of stormwater flows into surface waters
- Impacts from impervious surfaces
- Source control BMPs and environmental stewardship actions and opportunities in the areas of pet waste, vehicle maintenance landscaping and buffers

General public, businesses (home-based and mobile)

- BMPs for use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps and other hazardous materials
- Impacts of illicit discharges and how to report them

Homeowners, landscapers and property managers

- Yard care techniques protective of water quality
- BMPs for use and storage of pesticides and fertilizers
- BMPs for carpet cleaning and auto repair and maintenance
- Low Impact Development techniques, including site design, pervious paving, retention of forests and mature trees

- Stormwater pond maintenance
- Car washing

Engineers, contractors, developers, review staff and land use planners

- Technical standards for stormwater site and erosion control plans
- Low Impact Development techniques, including site design, pervious paving, retention of forests and mature trees
- Stormwater treatment and flow control BMPs

Methods to distribute information:

- Direct mailers
- Inserts in utility bills
- Presentations
- Classes
- Kids
- Radio ads
- TV -public service announcement
- Print-newspapers, yard signs

S5.C.1.b Performance Measurement

PERFORMANCE MEASUREMENT

- Methods of measuring behavior change
 - Perform initial survey of public behaviors to determine baseline
 - Conduct public education activities
 - Perform another survey of public behaviors
 - Compare results to initial survey to determine behavior change

A telephone survey was conducted in 2008 to measure the knowledge and practices regarding stormwater and pollution. Both the public and businesses were targeted. This baseline survey was a multi-agency endeavor, with Cowlitz County, the Cities of Kelso and Longview, and the Consolidated Diking Improvement District #1 all participating. A consulting firm was hired to develop and perform the telephone survey. A total of 390 surveys were completed with the adult public and 386 surveys were completed with businesses.

This survey has provided the baseline of general stormwater knowledge from which to improve. The City is using this baseline to help develop their education and outreach program. A second survey is planned for 2011 to assess improvements.

S5.C.1.c Recordkeeping

The City tracks and maintains records of public education and outreach activities in accordance with this permit. Information about many of these activities are also posted on the City's website.

S5.C.2 PUBLIC INVOLVEMENT AND PARTICIPATION

The SWMP shall include ongoing opportunities for public involvement through advisory councils, watershed committees, participation in developing rate structures, stewardship programs, environmental activities, or other similar activities. Each Permittee shall comply with applicable state and local public notice requirements when developing their SWMP. Planned activities for public involvement and participation are shown in Table 3 below.

Table 3: Public Involvement and Participation: Planned Activities

Planned Activity	Due Dates
1 Evaluate existing public involvement/participation activities	Ongoing
2 Identify individual responsible for public involvement/participation	-
3 Develop ongoing public involvement/participation strategy	Ongoing
Create opportunities for public involvement	
Post the Annual Report and SWMP document on the City website	Annually on 3/31
Identify public involvement venues	Ongoing
4 Reporting	
Initiate summary of public involvement/participation activities for the Annual Report	
Identify Annual Report attachments if needed	
5 Plan public involvement/participation activities and responsibilities	Annually on or before 3/31
Initiate SWMP document update if necessary	
Post the SWMP related documents on the City's website along with an email address for public involvement	
Initiate planning of future public involvement/participation activities	

S5.C.2.a Public Participation

The Kelso Stormwater Advisory Committee (KSAC) was formed in 2008 as an avenue for public participation and input. The KSAC meets on many months of the year and has 7 appointed members who represent different interests related to stormwater in the City. The members represent the environment, recreation, industrial permit holder, student, citizen, developer, and technical advisor. The KSAC has worked on the various requirements of this permit, including the IDDE Ordinance and the Stormwater Management Ordinance. People with interest in the City's stormwater issues are welcome to participate as a KSAC member when positions become available, can talk with current KSAC members, or can attend KSAC meetings.

People can also participate through involvement with the City's Planning Commission, City Council, or the region's Watershed Committee (Grays-Elochoman & Cowlitz Watershed Planning Unit – WRIA 25/26).

S5.C.2.b Reporting

Kelso maintains a website that includes posting of various stormwater documents, including those required by this permit. This website can be found at <http://stormwater.kelso.gov>.

S5.C.3 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

The SWMP shall include an ongoing program to detect and remove illicit connections, discharges as defined in 40 CFR 122.26(b)(2), and improper disposal, including any spills not under the purview of another responding authority, into the municipal separate storm sewers owned or operated by the Permittee. Permittees shall fully implement an ongoing illicit discharge detection and elimination program no later than 180 days prior to the expiration of the Permit. Planned activities for illicit discharge detection and elimination are shown in Table 4 below.

Table 4: Illicit Discharge Detection and Elimination Plan: Planned Activities

Planned Activity	Due Dates
1 Evaluate existing illicit discharge detection and elimination program	Ongoing with annual review
2 Develop Illicit Discharge Detection and Elimination Program Develop and implement screening procedures Review and update illicit discharge response/source control procedures if necessary Review and update tracking/documentation procedures if necessary Review and supplement public education/outreach efforts if necessary (coordinate with the City's public education and outreach program) Develop inspection plan and enforcement team	8/19/2011
3 Update storm sewer system map Define conveyance system and outfalls Define drainage areas and catchments Map structural BMPs Document permit-required attributes Develop procedures for additions and updates	8/15/2011
4 Update ordinances Determine inspection and enforcement procedures Update City Municipal Code to address illicit discharges if needed	8/15/2009
5 Evaluate and update current hotline procedures if necessary	2/15/2009
6 Develop training program Review current training with respect to illicit discharges Identify additional training if necessary Draft framework for training program	8/15/2009
7 Reporting Initiate summary of prior year's IDDE activities for each Annual Report Identify Annual Report attachments if needed	Annually 3/31
8 Plan future year's IDDE activities and responsibilities Initiate SWMP document update if necessary Initiate planning of next year's IDDE activities	

S5.C.3.a Mapping

The City began locating all storm drains via Global Positioning Unit (GPS) in 2008. This data is being developed to map these storm drain locations. The City is approximately 75% complete with this effort. The overall goal is to develop a municipal storm sewer system map. This map will provide locations of all catch basins, manholes, pipelines as well as known municipal separate storm sewer outfalls and receiving waters and structural BMPs owned, operated, or maintained by the City. This map will be updated as additional information becomes available or new additions or deletions made to the existing infrastructure. A draft map is available on the City's website at <http://stormwater.kelso.gov>. The storm sewer map is being developed together with a Stormwater Master Plan for the City.

S5.C.3.b Regulatory Mechanism

The City developed their Illicit Discharge, Detection, and Elimination Stormwater Ordinance with input from City departments, the KSAC, the City of Longview stormwater advisory committee (LSAC) and consultants. It was formally adopted by the City Council in August 2009.

S5.C.3.c Procedures

The City of Kelso's Public Works Department implements the City's IDDE program. The program goal is to provide for the health, safety, and general welfare of the citizens of the City through the regulation of non-stormwater discharges to the storm drainage system. The objectives of this program, per the IDDE Ordinance, are:

1. To regulate the contribution of pollutants to the stormwater drainage system by stormwater discharges by any user;
2. To prohibit illicit connections and discharges to the municipal separate storm sewer system; and
3. To establish legal authority to carry out all inspection, surveillance, and monitoring procedures necessary to ensure compliance with the Ordinance.

The specific procedures for IDDE program implementation are described in the Ordinance. Such procedures cover discharge prohibitions, suspension of stormwater drainage system access, industrial or construction activity discharges, inspection and sampling, use of best management practices, protection of water bodies, notification of spills, and enforcement.

The City is planning to build upon current IDDE activities to create a more identifiable program that includes:

- Procedures for locating priority areas likely to have illicit discharges;
- Procedures for tracing the source of an illicit discharge;

- Procedures for removing the source of the illicit discharge;
- Training for City staff on IDDE awareness; and
- Further public education of IDDE awareness.

S5.C.3.d Public Involvement

Public involvement opportunities to comment on the development of this ordinance were made available. Three public meetings were conducted as part of the City's normal ordinance adoption process. During this time period, the public was offered the opportunity to review and comment on the ordinance.

The City developed a stormwater hotline for people to call to report unlawful discharges into stormwater. The Kelso stormwater hotline phone number is 423-6590 during normal business hours. Kelso's after-hours Operations phone number for street and utility issues including illicit discharges is 423-5730. A 24-hour Longview/Kelso stormwater hotline is also available at 578-0900. Additionally, two forms are posted on the City's website for public input. The forms include a stormwater incident report for citizens to report spills and illicit discharges as well as a "citizen concern form" for people to provide many types of concerns to the Public Works Department.

S5.C.3.e Program Evaluation

As the IDDE program progresses through creation and maturity, the City will be evaluating its effectiveness on an on-going basis. The annual review and reporting requirements per the Permit ensure that these efforts are compiled and summarized at least annually.

S5.C.3.f Training

The City has developed and implemented a formal training program for its staff related to the IDDE requirements.

S5.C.4 CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

Each Permittee shall develop, implement, and enforce a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment, and construction site activities. This program shall be applied to all sites that disturb a land area one acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale. The program shall apply to private and public development, including roads. Planned activities for controlling runoff is shown in Table 5 below.

Table 5: Controlling Runoff from New Development, Redevelopment, and Construction Sites: Planned Activities

Planned Activity	Due Dates
1 Evaluate existing runoff control program	Annually
2 Review and update KMC to address permit requirement, if necessary	
Required thresholds and minimum requirements	
Site planning and BMP selection criteria that protect water quality, meet MEP, and satisfy AKART	8/15/2009
Legal authority to inspect new facilities	
Provisions for LID (or equivalent)	
Application of erosivity waiver	
3 Plan review, inspection, and enforcement	
Review and update plan review if necessary	
Develop inspection procedure plan	
Identify staff inspection team	
Update enforcement strategy if necessary	8/15/2009
Identify enforcement team	
Update KMC if necessary	
Develop mechanisms to track plan review, inspection, and enforcement actions	
Document NOIs for construction and industrial activities	
4 Operation and maintenance	
Update process for accepting new facilities or inspecting private facilities (keep private or go public)	
Document new stormwater systems for inspection, operation, and maintenance	8/15/2009
Update KMC to include long-term operation and maintenance requirements for phased construction	
Review BMP inspection frequency	
5 Staff trained in plan review, inspections, and enforcement related to stormwater	8/15/2009
Define training needs (who and what)	

Table 5: Controlling Runoff from New Development, Redevelopment, and Construction Sites: Planned Activities

Planned Activity	Due Dates
Identify supplemental training needs	
Develop training schedule	
Track training and summarize for Annual Report	
6 Reporting	
Initiate summary of plan review, inspection, and enforcement activities for Annual Report	Annually
Identify Annual Report attachments, if any	
7 Plan next year's runoff control activities and responsibilities	
Initiate SWMP document update if necessary for Annual Report	Annually
Initiate planning of future runoff control activities	

S5.C.4.a Regulatory Mechanism

The City drafted a Stormwater Management Ordinance with the help of City staff, consultants, KSAC, LSAC and was approved for adoption through the KSAC. The City formally adopted this ordinance in March 2010.

In conjunction with the development of this ordinance, the City revised applicable portions of the Kelso Engineering Design Manual (KEDM). This process ensured consistency between the ordinance and the KEDM. Additionally, the ordinance refers to KEDM in relation to specific technical issues easy user reference. The KEDM was also developed in conjunction with the City of Longview's Stormwater Management Manual to create consistent development guidelines in the region. The KEDM revisions were adopted by ordinance concurrently with the Stormwater Management Ordinance.

S5.C.4.b Permitting

The City's permitting process includes plan review, inspection, and enforcement capabilities and is implemented through the Public Works and Planning Departments. Permitting requirements were updated through the Stormwater Management Ordinance and KEDM.

S5.C.4.c Maintenance Inspection (Private)

The Stormwater Management Ordinance allows the City to make inspections on private stormwater facilities. The City is in the process of training its staff related to protection of stormwater quality at privately-owned properties. This includes proper operations and maintenance measures.

S5.C.4.d Recordkeeping

The City maintains inspection and enforcement records on permitted activities within the City boundaries. These records are located within both the Public Works and Planning Departments.

S5.C.4.e Notice of Intent

The "Notice of Intent for Construction Activities" and "Notice of Intent for Industrial Activities" are available at City Hall. The address for City Hall is 203 S. Pacific Avenue, Kelso, WA 98626.

S5.C.4.f Training

Currently, two staff members responsible for inspecting stormwater systems and issues have been formally trained and certified as Certified Erosion Sedimentation Control Leads (CESCL).

S5.C.5 POLLUTION PREVENTION AND OPERATION AND MAINTENANCE FOR MUNICIPAL OPERATIONS

Within three years of the effective date of the Permit, each Permittee shall develop and implement an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing polluted stormwater runoff from municipal operations. Planned activities for pollution prevention and the operation and maintenance program are listed in Table 6 below.

Table 6: Pollution Prevention and Operation and Maintenance Program: Planned Activities

Planned Activity	Due Dates
1 Evaluate existing pollution prevention and operation and maintenance program	Ongoing with annual review
2 Update inspection and maintenance program	
Define and quantify system for maintenance (e.g. type and size)	Ongoing
Catch basins	All inspected by 8/15/2011. Inspect 20 % of catch basins from August 1, 2012 through July 31, 2013
Stormwater treatment and flow control facilities	All inspected by 2/15/2012 on a 1-year schedule thereafter
Streets, roads, and highways	
Parks, open spaces, right-of-way	
Determine system maintenance for water quality	
Evaluate frequency of inspections	Ongoing, due 2/15/2010
Develop resource needs assessment for maintenance	
Fund and staff maintenance plan (not a SWMP requirement)	
Develop tracking mechanisms for inspections, maintenance, and repairs	
3 Training of operation and maintenance staff	
Identify operation and maintenance training needs (who and what)	
Update current training if necessary	2/15/2010
Develop ongoing training program	
Document training	
4 Reporting	
Initiate summary of the Pollution Prevention and Operation and Maintenance activities for the Annual Report	
Identify Annual Report attachments, if any	Annually
5 Plan the Pollution prevention and O&M activities and responsibilities	
Initiate SWMP document update if necessary	
Initiate planning of 2009 Pollution Prevention and O&M activities	

S5.C.5.a Maintenance Standards

The City has an O&M program with the ultimate goal of minimizing pollutant runoff from municipal operations. The program includes street and gutter sweeping, pipe and culvert cleaning, ditch maintenance, catch basin cleaning, snow and ice control, road repair, vegetation management and emergency stormwater system repairs. Stormwater facilities will be inspected annually. Catch basins and inlets will be inspected at least once every five years. Those requiring maintenance will be maintained within six months of the inspection.

S5.C.5.b Annual Inspection (Public)

Stormwater facilities other than catch basins will be inspected and maintained, if necessary, on an annual basis. Stormwater facilities identified for inspection include:

- Stormwater pond at west end of Allen Street Bridge
- CDS continuous deflective separation unit on North Pacific Avenue
- Stormceptor unit at Oak and 3rd Ave. parking lot

S5.C.5.c Spot Checks

Spot checks of City stormwater facilities for water quality and quantity will be performed after rain storms larger than the 24-hour, 10-year storm event including documentation of the inspections.

S5.C.5.d Catch Basin Inspection

As part of the stormwater system mapping, the City has been cleaning some catch basins in order to make measurements. All catch basins were inspected and cleaned by September 28, 2012. Twenty percent (20%) of the City's catch basins will be inspected and cleaned if necessary from September 29, 2012 through July 31, 2013

S5.C.5.e Compliance

The City intends to comply with inspection requirements described above. The City will review and update all procedures and practices to assure permit compliance and make adjustments as needed.

S5.C.5.f Practices to Reduce Stormwater Impacts

The City plans to implement and refine practices and procedures to reduce stormwater impacts associated with runoff from streets, parking lots, roads and highways owned or maintained by

the City, as well as road maintenance activities conducted by the City. Activities that will be addressed include: pipe & culvert cleaning, ditch maintenance, street cleaning, road repair and resurfacing, snow and ice control, utility installation, pavement striping, maintaining roadside areas and vegetation, and dust control.

S5.C.5.g Public Land Maintenance

The City is committed to implementing policies and procedures regarding the maintenance of all public lands owned or maintained by the City. These lands include parks, open space, road right-of-way, maintenance yards and stormwater treatment and flow control facilities. Policies and procedures addressed include: application of fertilizers, pesticides and herbicides, sediment and erosion control, landscape maintenance, vegetation disposal, and cleaning and maintenance of building exteriors.

S5.C.5.h Training

The City developed a training program for its field staff in pollution prevention of its municipal operations and maintenance programs. This training program component was implemented by the Permit deadline of February 15, 2010. Further training of staff will occur when modifications to procedures and policy have been implemented.

S5.C.5.i Stormwater Pollution Prevention Plans (SWPPP)

A stormwater pollution prevention plan was drafted for the Operations maintenance facility. Operations staff have been trained on the SWPPP. The City plans to inspect, implement and maintain BMPs outlined in the SWPPP. Training will occur when the SWPPP is updated due to a change in design, construction, operation, or maintenance which cause(s) the SWPPP to be less effective in controlling the pollutants. The SWPPP can be found within the City's stormwater website at <http://stormwater.kelso.gov>.

S5.C.5.j Recordkeeping

The City will maintain records of inspections and maintenance or repair activities in accordance with the S9 Reporting Requirements of the Permit.



Engineering Phone 360-423-6590
Fax 360-423-6591
Operations Phone 360-423-5730
Fax 360-423-8196

CITY OF KELSO
Public Works Department
203 S. Pacific Ave., Suite 205
PO Box 819
Kelso, WA 98626

April 6, 2012

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

Dear Sir/Madam:

The City of Kelso is covered under the Phase II Municipal Stormwater Permit (Permit) and has complied with most of the Permit requirements that were due February 15, 2012. This letter is a non-compliance notification as required by Section G20 of the Permit. One Permit requirement, catch basin inspection and cleaning, was not completed by February 15, 2012. The table below is a summary of the non-compliance. The City will hire a contractor to clean *all* City catch basins and this will give a baseline condition in which to monitor sedimentation rates in each catch basin.

Table: Condition S5.C.5.d

Description of Non-compliance	Beginning Date of non-compliance	Anticipated date of correction	Steps taken to eliminate non-compliance
Inspection and cleaning of catch basins	Feb. 15, 2012	Sept 28, 2012	A contract was put out to bid on April 4, 2012 to clean all City catch basins.

If you have any questions or comments, feel free to contact me at 360-423-6590. Thank you.

Sincerely,

Van McKay, P.E.
Senior Engineer

607002



City of Kelso

Steve Taylor
City Manager
203 S. Pacific Ave. / P.O. Box 819
Kelso, Washington 98626

Shelly Timm
Executive Assistant
Phone: (360) 423-1371
Fax: (360) 423-6591

October 17, 2012

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

Dear Sir/Madam:

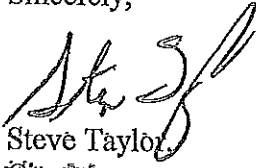
This letter is in response to our "Section G20" letters of April 6 and June 4, 2012. The City of Kelso is covered under the Phase II Municipal Stormwater Permit (Permit) and has complied with the Permit requirements of an annual field assessment and catch basin cleaning. Background information is noted in the table below.

Description of Non-compliance	Beginning Date of Non-compliance	Date of correction	Steps taken to eliminate non-compliance
The annual field assessment performed on a high-priority water body in 2011 was not performed during dry weather.	Jan. 1, 2012	July 6, 2012	The high-priority water body that was field assessed in 2011 was field assessed again during a period of dry weather.
Inspection and cleaning of catch basins not completed by Feb. 15, 2012	Feb. 16, 2012	Sept 27, 2012	A contract to clean <i>all</i> City catch basins is substantially complete. This project creates a baseline condition in which to monitor sedimentation rates in each catch basin.

The City believes it is in compliance with its Permit. If you have any questions or comments, feel free to contact Van McKay, Senior Engineer, at 360-423-6590.

Certification: "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 gathered and evaluated 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 willful violations."

Sincerely,



Steve Taylor
City Manager

ST:vm-smt

Cc. Lisa Cox, Department of Ecology