



## MEMORANDUM

**TO:** The Honorable Satpal Singh Sidhu, County Executive and  
Honorable Members of the Whatcom County Council

**THROUGH:** Elizabeth Kosa, Public Works Director

**FROM:** Kraig Olason, Stormwater Program Manager *ko*

**DATE:** June 28, 2023

**RE:** Project Background and Purpose for Maintenance and Operations  
Central Shop's NPDES Stormwater Improvements

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Please review the details on the background, purpose and requirements that are driving the necessity for the Whatcom County Public Works Maintenance & Operations Division's Central Shop NPDES Stormwater Improvements project.

### Background and Purpose

Whatcom County's Central Shop meets the definition facility with industrial activities in the North American Industry Classification System (NAICS). Under this definition, the facility is required to obtain and comply with an Industrial Stormwater General Permit (ISGP), a National Pollution Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associate with Industrial Activities.

The permit requires certain water quality standards for waters discharged from the facility. These standards are set by the State of Washington Department of Ecology (DOE) to protect water quality for the health of natural resources and general public. The Central Shop is currently out of compliance with its ISGP. The County has made steps (Level 1- 3 corrective actions) to address the site's stormwater discharge water quality. However, discharge test results have indicated additional best management practices (BMPs) are required to meet the water quality standards. The county has determined that capital improvements are required in order to be able to meet the state's water quality standards.

The purpose of this project is to evaluate the current stormwater system and determine future improvements at the Central Shop facility. The design will include appropriate stormwater BMPs to improve the site's water quality to the standard required. The deliverables of the project are to produce a stormwater design focused on improving the site's water quality and to comply with the site's ISGP. Construction of BMPs are anticipated and required to be installed by Fall 2024.

The design will be done in two phases. The first phase will consist of thorough evaluation and analysis of the site, development of alternative options to meet requirements, a proposal of design and an NPDES Engineering Report submitted to the DOE for approval. The second

phase will commence upon approval of design by DOE, produce a final design and prepare the project for bid prior to construction in Fall 2024.

The Stormwater Division is managing the project design through construction on behalf of the Maintenance and Operations Division. As the owner and facility manager, the Maintenance and Operations Division will maintain implemented BMPs and other recommendations. Throughout the project, the divisions will collaborate and communicate with each other and the Department of Ecology. This will ensure a long-term solution appropriate for the facility and compliance with water quality standards set to protect natural resources and human health.

**Funding Amount and Source**

This request, in the amount of \$255,500, will be funded by the Road Fund and will provide the funds necessary to complete the project design. An additional request will be made for the construction costs and oversight expenses.