STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

November 21, 2025

Blair King, City Manager
City of Bainbridge Island
280 Madison Ave N
Bainbridge Island, WA 98110

Re: **Phase II Municipal Stormwater Permit No. WAR045503 Audit Findings**

Dear Blair King:

On September 16, 2025, representatives from the Washington State Department of Ecology (Ecology) conducted a detailed on-site audit of the City of Bainbridge Island's (Bainbridge Island) Stormwater Management Program. Enclosed please find a report summarizing key findings from the day-long audit. The report is organized by Permit element and provides specific Key Findings, Recommendations for Program Improvement, and Areas of Potential Non-Compliance.

Background
The audit was designed to evaluate Bainbridge Island's compliance with the NPDES Phase II Municipal Stormwater Permit (Permit) and to assess the clarity and effectiveness of Permit language and its requirements. It was performed pursuant to 40 CFR Sec. 122.41(i), 40 CFR Sec 123.26, and RCW 90.48.

The Bainbridge Island audit focused on three major Permit programs within the city:

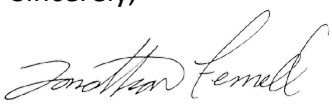
- Municipal separate stormwater sewer system (MS4) mapping,
- Illicit Discharge Detection and Elimination (IDDE), and
- Operations and Maintenance (O&M) of Bainbridge Island's MS4.

The audit process included background materials reviewed by Ecology staff, in person interviews with key Bainbridge Island program staff and managers, and an inspection of Bainbridge Island's decant facility.

Please see the enclosed full audit report for details.

In closing, we wish to express our appreciation for the time and focused attention you have dedicated to this effort. Both Stella Collier and Paul Nylund deserve special recognition for their efforts to prepare background materials for Ecology's review in advance of the audit. We look forward to working with your staff to address any outstanding issues and to ensure Bainbridge Island's ongoing and full compliance with the requirements of the Permit. If you have questions, please contact Roger Chang at (425) 758-5096 or at Roger.Chang@ecy.wa.gov.

Sincerely,



Jay Fennell
Watershed Protection Unit Supervisor
Northwest Region Office

Enclosures: Bainbridge Island Audit Report
Bainbridge Island Audit Announcement Letter
Bainbridge Island Decant Facility Inspection Report
Bainbridge Island Audit Day of Agenda

cc: Stella Collier, City of Bainbridge Island
Roger Chang, Department of Ecology
Rachel McCrea, Department of Ecology
PARIS: City of Bainbridge Island; WAR045503

WA Department of Ecology
NPDES Municipal Stormwater Permit Phase II Western WA Audit
City of Bainbridge Island, WA
September 16, 2025
9:30 AM-3:45 PM

Introduction

On September 16, 2025, the Department of Ecology (Ecology) conducted an audit of the City of Bainbridge Island's (Bainbridge Island) Municipal Separate Storm Sewer (MS4) Program. Discharges from Bainbridge Island's MS4 are regulated under the *Western Washington Phase II Municipal Stormwater Permit (effective: August 1, 2024)* (Permit) issued by Ecology. Bainbridge Island was first covered under the Phase II Permit on January 17, 2007, and maintains permit coverage under its current permit (Permit WAR04-5503) until July 31, 2029.

This MS4 program audit was conducted as part of Ecology's municipal stormwater permit compliance assurance program to evaluate City and County Permittees' compliance with the Permit and to assess the clarity and effectiveness of Permit language and its requirements. This report summarizes the findings of the audit.

Background

The City of Bainbridge Island is located in Kitsap County, Washington, and is home to approximately 25,000 residents. Governed by a seven-member City Council and managed by a City Manager, the local government includes departments such as Planning & Community Development, Police, and Public Works. The Public Works Department holds the primary responsibility for coordinating and implementing the MS4 Permit. This department is staffed to manage infrastructure, with specific staff dedicated to storm sewer maintenance and Permit compliance efforts.

Audit Logistics

Ecology notified Bainbridge Island by letter on July 17, 2025 (see Appendix A) that it had been selected at random for a detailed on-site evaluation. The evaluation was scheduled for Tuesday, September 16, 2025. The notification letter included a detailed information request concerning 12 items for Bainbridge Island to document and submit to Ecology in advance of the in-person audit visit (See Appendix A). Ecology staff reviewed the submitted documents prior to the on-site evaluation. The audit was structured to focus on the City's MS4 Mapping, Illicit Discharge Detection and Elimination (IDDE), and Municipal Operations and Maintenance (O&M) Programs. Ecology conducted interviews of select staff (See Table 1 below). An additional field component of the audit focused on inspecting a municipal operations facility (Appendix B). See Appendix C for the Day of Agenda.

Table 1. The primary representatives participating in the daylong audit include:

City of Bainbridge Island			
Name	Title	Phone	Email
Stella Collier	Stormwater Management Program Coordinator	(206) 780-3724	scollier@bainbridgewa.gov
Paul Nylund	Development Engineer/Water Resources Manager	(206) 780-3783	pnylund@bainbridgewa.gov
Ray Navarette	Public Works Utilities Supervisor	(206) 780-3582	rnavarette@bainbridgewa.gov
Tom Edwards	Assistant Public Works Director	(206) 780-3584	tom.edwards@bainbridgewa.gov
Chris Wierzbicki	Public Works Director	(206) 842-2016	cwierzbicki@bainbridgewa.gov
Department of Ecology			
Roger Chang	Dept. of Ecology, Municipal Stormwater Permit Planner	(425) 758-5096	Roger.chang@ecy.wa.gov
Angela Vincent	Dept. of Ecology, Municipal Stormwater Permit Planner	(360) 407-6276	Angela.vincent@ecy.wa.gov
Amy Waterman	Dept. of Ecology, Municipal Phase I Permit Writer	(360) 338-5831	Amy.waterman@ecy.wa.gov
Evan Dobrowski	Dept. of Ecology, Industrial Stormwater Inspector	(425) 213-4230	Evan.dobrowski@ecy.wa.gov

MS4 Mapping and Illicit Discharge Detection and Elimination (IDDE)

Overview of Permit Requirements Under Review

Section S5.C.4.a of the Permit requires that City/County Permittees map their MS4s on an ongoing basis. The Permit's ongoing mapping requirements specify that the following features must be mapped:

- Known MS4 outfalls and discharge points, including outfall size and material, where known,
- Receiving waters, other than groundwater,
- Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee,
- Geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters,
- Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems, including the features and attributes specified in the Permit,
- Connections between the Permittee's MS4 and other municipalities or public entities,
- All connections to the MS4 authorized or allowed after February 16, 2007,
- And all known connections from the Permittee's MS4 to a privately owned stormwater system.

The 2024 Permit also includes new mapping requirements with implementation dates beginning March 31, 2026.

Section S5.C.5.c directs Permittees to implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater illicit discharges into their MS4. Permit language describes allowable and conditionally allowable discharge types. The Permit also requires that the ordinance include escalating enforcement procedures and actions. In accordance with Section S5.C.5.e, the Permittee is required to implement a compliance strategy that includes the escalating enforcement procedures and actions.

S5.C.5.d requires Permittees to implement an ongoing program to detect and identify non-stormwater discharges and illicit connections to the MS4. These requirements include procedures for conducting investigations of the MS4, a publicly listed and publicized hotline for public reporting or illicit discharges, and an ongoing training program for all municipal field staff who might observe an illicit discharge/illicit connection as part of their normal job responsibilities. The training program must address the proper procedures for reporting and responding to illicit discharge/connection, and records must be kept of the trainings provided and staff trained.

S5.C.5.e requires Permittees to implement a program to address illicit discharges into the MS4. These requirements include procedures for characterizing, tracing, and eliminating illicit discharges and connections, including specific timeframes for responding and special procedures for the post-emergency clean-up of firefighting activities.

S5.C.5.f requires Permittees to train staff who are responsible for implementing the IDDE program, and to document and maintain records of the training provided and the staff trained.

Section S5.C.5.g requires Permittees to track and maintain records of all activities conducted to meet the requirements of the IDDE section of the Permit.

Key Findings

Bainbridge Island's MS4 mapping and documentation does not fully comply with all of the requirements specified in Permit section S5.C.4.a. The City acknowledged that its GIS MS4 mapping data is not fully correct or complete and that it has not been updated since 2018. To meet mapping requirements, the City hired a GIS Technician in January 2025. Ecology understands that the City's GIS technician is currently assisting with the City's MS4 mapping and documentation backlog and making ongoing improvements.

The City currently uses both Ecology and King County mapping standards. Although these standards are fully described, the City is reviewing and updating the standards in real time.

Bainbridge Island stated that it does not have areas served by the City's MS4 that do not discharge stormwater to surface water. Specifically, Bainbridge Island staff indicated that they do not have a series of closed basins. Stormwater collected within the City infiltrates or is conveyed to discharge into surface water. However, because the City has not distinguished between outfalls and discharge points within their maps, it is unclear whether the City has met this permit requirement. Further investigation is needed to determine if the City has "geographic areas served by the MS4 that do not discharge stormwater to surface water." These "geographic areas...that do not discharge stormwater to surface water" are related to the City's discharge points. A discharge point means "the location where a discharge leaves the Permittee's MS4 through the Permittee's MS4 facilities/BMPs designed to infiltrate."

In the event of an illicit discharge of hazardous materials, BIMC 15.22.060.G requires notification of emergency dispatch services (911) and the City's Public Works department. However, the City currently advertises a regional spill hotline (Kitsap1) for direct public report, rather than a dedicated City Public Works number.

The City maintains a rotational on-call staff roster of 2 to 3 personnel for IDDE response and commits to a one-hour response timeframe upon receiving IDDE notification.

Due to the City's geographical characteristics, the majority of IDDE incidents are linked to residential construction activities. Furthermore, the City maintains a franchise agreement with Puget Sound Energy (PSE) that clarifies responsibility for spills originating from PSE utility assets.

The City verbally described a logical stepwise protocol for investigation, containment, characterization, and correction of IDDE incidents. The City manages incident tracking using a combination of the WQWebIDDE database and an internal folder for "SeeClickFix" web forms, with all web form incidents designated for final entry into the WQWebIDDE database to ensure comprehensive record-keeping.

The City has a clear, stepwise progressive enforcement approach. This process begins with pursuing voluntary compliance through education and technical assistance (Notice of Warning of Violation). If voluntary compliance is unsuccessful, the City progresses to issuing a Notice of Violation, followed by a second Notice of Violation or Notice of Infraction, which may include civil and/or criminal penalties. Staff have reported that IDDE incidents are resolved through voluntary compliance after a Notice of Warning of Violation was issued.

The City has developed an in-house IDDE refresher training program provided to Public Works staff annually. This training has been extended to other City department personnel. Employee training records are documented and maintained.

Bainbridge Island verbally stated that the City had performed its own internal audit and discoveries to improve its stormwater program. Ecology obtained the City's report "Stormwater Systems Plan" through the City's public website. Ecology reviewed the report which further confirms the findings above.

Recommendations for Program Improvement

Mapping

- We strongly encourage Bainbridge Island to implement the MS4 mapping and documentation recommendations included in its Stormwater System Plan (SWSP) (October 2024).

IDDE

- We strongly encourage Bainbridge Island to implement the IDDE recommendations included in its SWSP (October 2024).
- We encourage Bainbridge Island to include in BIMC Chapter 15.22 the permit requirement that the City implement its compliance strategy in a documented effort to eliminate any illicit connection within six (6) months of confirmation per Section S5.C.5.e.v.(d).
- We encourage Bainbridge Island to revise BIMC 15.22.050 to accurately reflect the publicly advertised regional spill hotline number as the preferred method for the public to report illicit discharges.
- Bainbridge Island should ensure that training documentation includes a description of the training offered, dates the training was offered or completed, and staff in attendance.

Areas of Potential Non-Compliance

Based on the information reviewed, it appears that the City is not in compliance with the following permit conditions:

MS4 Mapping

- The City does not have a current GIS map of their MS4 assets and has not maintained this map since 2018. (S5.C.4.a).
- The City's online map presently does not differentiate between MS4 outfalls and MS4 discharge points; both are represented within the same map layer using identical symbology. (S5.C.4.a.i).
- The City has not mapped "geographic areas served by the MS4 that do not discharge stormwater to surface water." Further investigation by the City is needed to determine if the "geographic areas..." need to be included on its map. (S5.C.4.a.iv).

Operations & Maintenance

The City of Bainbridge Island owns or operates 196 permanent stormwater treatment and/or flow control BMPs/facilities and 1978 catch basins. Maintenance standards established for these facilities generally match those in the Stormwater Management Manual for Western Washington (2019). The City owns and operates one maintenance facility, and one decant facility. The City O&M staff are responsible for numerous activities, including maintaining control structures, catch basin grates, repairing pipes, addressing erosion issues, vactoring (small volumes), cleaning up storm debris, pipe inspection, street sweeping, catch basin vactoring, storm filter replacement and pond maintenance.

Overview of Permit Requirements Under Review

Section S5.C.9.a requires Permittees to develop and implement maintenance standards for all municipally owned or operated stormwater treatment and flow control BMP/facilities and catch basins. It also lays out timeframes for completing necessary maintenance.

S5.C.9.b requires Permittees to implement a program to verify adequate long-term O&M of non-municipally owned stormwater facilities that were permitted pursuant to S5.C.6 of the permit. The requirements include an ordinance or other enforceable mechanism that identifies the party responsible for meeting the maintenance standards and timeframes established under S5.C.9.a, require annual inspections of facilities by qualified personnel, and establish recordkeeping requirements.

Section S5.C.9.c describes inspection requirements and options for municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities, requires spot checks of potentially damaged permanent stormwater treatment and flow control BMPs/facilities after major storm events, describes catch basin inspection requirements and options, and clarifies that Permittees are expected to establish inspection programs designed to achieve 95% of all required system inspections.

Section S5.C.9.d requires Permittees to establish practices, policies, and procedures to reduce stormwater impacts associated with runoff from lands owned or maintained by the Permittee, as well as with certain road maintenance activities.

Section S5.C.9.f requires Permittees to implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or stormwater yards and material storage facilities owned and operated by the municipality that are not required to have coverage under the Industrial Stormwater General Permit or another NPDES permit that authorizes stormwater discharges associated with the activity.

Section S5.C.9.g requires Permittees to implement and document an ongoing training program for employees whose primary construction, operations, or maintenance job functions may impact stormwater quality.

Section S5.C.9.h requires Permittees to maintain records of all activities conducted to meet the requirements of this section.

Key Findings

Bainbridge Island lacks a formalized training program for its O&M staff. Staff currently receive on-the-job training, where newer staff are paired with senior level staff. However, the City does not track or record these on-the-job training occurrences. The City does require and track staff participation in certified courses, including Certified Erosion and Sediment Control Lead (CESCL) and 40-hour HAZWOPER training.

Bainbridge Island does not currently utilize a formal asset management system, relying instead on Excel spreadsheets for stormwater asset data tracking. The City has initiated efforts to integrate a new asset management solution using Survey123 and ArcGIS platforms, which is intended to improve tracking of inspections and maintenance needs.

Bainbridge Island O&M staff standardized their checklists for stormwater facility and catch basin inspections. These checklists incorporate maintenance standards derived from the 2019 Ecology Stormwater Management Manual for Western Washington (2019 ECY SWMMWW). Inspection data is currently entered into an Excel spreadsheet. When maintenance is required, staff indicated that issues are resolved prior to the deadline required by the Phase II Permit. Stella Collier internally monitors compliance with these maintenance timelines via the tracking spreadsheets.

Bainbridge Island annually inspects all publicly owned and regulated stormwater treatment and flow control BMPs/facilities. The City reports that it meets the requirement to inspect at least 95% of its catch basins every two years, utilizing the standard inspection approach.

Bainbridge Island has developed and utilizes an official manual documenting O&M practices, policies, and procedures for staff to reference during field activities.

Bainbridge Island staff shared that the City does not utilize or store pesticides or herbicides. The City reports past noxious weed abatement was provided by Kitsap County; however, with the discontinuation of that service, the City uses contractors on an as-needed basis to manage noxious weeds and control pests. Further, the City reports: “Herbicides are not used by any of our contract companies per City policy” (T. Edwards, personal communication, 10/14/2025).

Completed inspection checklists for publicly owned and regulated stormwater facilities and catch basins were not provided to Ecology prior to the September 16, 2025, meeting. These required documents were subsequently submitted as a post-meeting follow-up and were reviewed by Ecology staff.

Key Site Inspection Observations

The audit team was joined by Ecology Industrial Stormwater Inspector Evan Dobrowski and conducted a site visit to the City-owned and operated decant facility located at 6400 Don Palmer Avenue. This facility serves as the primary consolidation point for liquids and solids generated from street sweeping, line cleaning, and road maintenance. It is also utilized for storage of surplus vehicles, general materials, and clean raw materials (e.g., sand, gravel, and mulch). Liquids generated from maintenance activities are stored in subsurface settling vaults totaling approximately 7,000 gallons. Solids generated from maintenance activities are stored on the concrete pad within the decant facility. Both solids and liquids are covered by a canopy structure.

The property is adjacent to a capped landfill and a privately owned transfer station (Bainbridge Island Disposal). No equipment maintenance or exterior vehicle washing occurs at this location, and there is no accessible sanitary sewer connection nearby. The washing of the interior debris holding tanks on street sweepers occurs within the covered areas of the facility. Materials generated from ditches, catch basins, line cleaning and road maintenance are stored on site and are tested in accordance with the Decant facility’s health department permit to determine whether the material stored is hazardous.

The facility’s historical discharge path of decanted liquids involved a treatment train consisting of an oil/water separator, sand filter, biofiltration swales, and a final stormwater detention pond. Currently, the City vacuums liquids from subsurface settling vaults and disposes of them via a vactor truck into an off-site sanitary sewer manhole. Solid waste is managed in accordance with the facility’s specific permit issued by the Kitsap County Health Department.

Decant Facility

- The on-site SWPPP, maintained in the office building on site, was found to be inaccurate. Specifically, the document fails to reflect the current liquid disposal practices, which involve trucking to the sanitary sewer, and does not document the disuse of the previously utilized oil/water separator, sand filter, biofiltration swales, and detention pond treatment train.

- Operational Source Control BMP Observations
    - Storage of uncovered erodible materials outside the covered area is subject to stormwater and would lead to discharge without treatment to the City's MS4 conveyance system.
        - In the inspection reports, from 2021 and earlier, reviewed by Ecology, the City consistently answered "No" to the following question on its form: "Are all uncontained material piles stored in a manner that does not allow discharge of impacted stormwater?"
    - Drums and storage containers on-site, including those that appeared empty, lacked proper labeling. Surplus vehicles stored on site still contain residual fluids, are not stored on an impervious surface, and one vehicle was observed to be leaking.
    - Soil stockpiled within the decant facility containment area was observed to be above the height of the six-foot concrete stem walls.
    - Track out of sediment and debris was observed from the covered portion of the decant facility to the rest of the site.
- Illicit Discharge Event
    - During the site visit, the audit team discovered decant liquid leaving the subsurface settling vaults and entering the sand filter. The sand filter was observed to be saturated with water and ponded water was observed at the outlet from the sand filter to the biofiltration swale. No evidence of water was observed further downstream of the biofiltration swale or in the stormwater detention pond.
    - After a City-led investigation following the site visit, they determined that a valve leading from the decant liquid vault to the sand filter was inadvertently opened. The duration that this valve was opened is unknown. Based on the bright green vegetation in the biofiltration swale during the dry season (contrasting with dry grass around it), visual evidence suggests that this discharge has been occurring for some time. The City has since capped the outlet from the vault to the sand filter to prevent this from occurring again.

Recommendations for Program Improvement

O&M Program

- We recommend that the City implement an asset management software system to enhance tracking and recordkeeping of stormwater BMP/facility inspections, maintenance, and enforcement activities, as well as to streamline the scheduling of maintenance tasks and reporting processes. Implementing an asset management software system compatible with GIS and connected to inspection reporting will enhance quality control and strengthen the overall integrity of the City's stormwater asset management program.

- We strongly encourage the City to establish a formal system to track and document all O&M staff training events including on-the-job training. Additionally, the City is encouraged to establish a standardized training framework to ensure continuity of knowledge in the event of staff turnover.
- We encourage the City to review its Practices, Policies, and Procedures document to ensure that it is up to date and reflects all current field activities and operational protocols.

Decant Facility

- We strongly encourage the City store stockpiled materials generated from maintenance activities below the six-foot concrete stem walls of the decant facility.

Areas of Potential Non-Compliance

Based on the information reviewed, it appears that the City is not in compliance with the following permit conditions:

O&M Program

- The City lacks documentation of O&M staff on-the-job training. (S5.C.9.g).

Decant Facility

- The SWPPP prepared for the City's decant facility is inaccurate and lacks relevancy to the operation occurring which includes disposal method of decant liquids, and status of inactive treatment BMPs. (S5.C.9.f.i).
- Storage of sand, gravel, mulch and other materials on site are exposed to stormwater. Review and implement SWMMWW BMP S429: BMPs for Storage or Transfer of Solid Raw Materials, Byproducts, or Finished Products. (S5.C.9.f.ii).
- The City shall ensure that all drums and storage containers located on site are properly labeled, regardless of content or whether they are empty in accordance with SWMMWW BMP S427. (S5.C.9.f.ii).
- Bainbridge Island does not have inspection records of decant facility inspections for 2022, 2023, and 2024. Records shall be kept for at least five years after the Permit's expiration date. (S5.C.9.f.ii, S9.B).
- Leaking vehicles on site do not have proper secondary containment, nor have spills been cleaned up. (S5.C.9.f.v).

Conclusion

Ecology values its partnership with Bainbridge Island and remains available to provide technical assistance to support successful permit implementation. If Bainbridge Island staff have any questions about the results of this report, please contact your permit manager, Roger Chang at Roger.Chang@ecy.wa.gov, or at (425) 758-5096.

Please follow up with your Ecology Permit Planner upon receipt of this report. If the City confirms that any permit requirements were not met, General Condition G20 of the Permit requires submittal of a non-compliance notification within 30 days of becoming aware of the non-compliance. If the City determines that a non-compliance notification is not required for any Areas of Potential Non-Compliance identified, please include your reasoning in an email to your Ecology Permit Planner within 30 days.

If the City fails to comply with the conditions of your permit, Ecology may take formal administrative enforcement action, including issuing orders and penalties. Ecology's enforcement authority for NPDES permits is governed by Chapter 173-220-230 of the Washington Administrative Code (WAC).

Appendix A:
Audit Announcement Letter

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

July 17, 2025

Blair King
City of Bainbridge Island
280 Madison Ave N
Bainbridge Island, WA 98110

RE: City of Bainbridge Island,
Phase II Municipal Stormwater Permit #WAR045503 – NOTICE OF AUDIT

Dear Blair King:

This letter provides formal notification that the Washington Department of Ecology (Ecology) intends to conduct an audit of your Stormwater Management Program that is required by the NPDES Phase II Municipal Stormwater Permit. The audit will be performed pursuant to 40 CFR Sec. 122.41(i), 40 CFR Sec. 123.26, and RCW 90.48.

For this audit, Ecology will review specific components of the Municipal Stormwater Management Program (rather than a comprehensive audit of a jurisdiction's entire program). We plan to review your MS4 Mapping, IDDE, and Municipal O&M Programs. The audit will consist of interviews with appropriate staff members, file reviews, and inspection of a municipal operation yard. Appropriate and knowledgeable staff will need to be available to ensure an accurate audit of your program.

We have tentatively scheduled the audit to take place on **Tuesday, September 16, 2025**, and would like to start at 9:30 a.m. at your offices. If this date and time is not feasible for you and your staff, please respond within **five working days** to re-schedule. In addition, please provide a suitable meeting location for all parties to meet.

To prepare for this audit, we request that you provide the information listed below, **at least 10 business days prior to your scheduled audit.** If any of this information cannot be provided in advance because of your record types or formats, let us know and be prepared to present the requested information at our meeting.

Program Organization

1. A copy of the organizational structure showing staff/positions responsible for implementing the stormwater programs under review.
    a. A description of how these stormwater programs are implemented within your organization (e.g., workflow or narrative).
    b. If these records do not exist, ensure appropriate and knowledgeable staff will be available at the meeting.

S5.C.4. Mapping

2. A current map showing the city's MS4 features per Special Condition S5.C.4.a.

S5.C.5. Illicit Discharge Detection and Elimination

3. A copy of or a link to the local ordinance or other regulatory mechanism to effectively prohibit illicit discharges (S5.C.5.c.).
    a. Documentation of the enforcement/compliance strategy to implement the ordinance or regulatory mechanism above (S5.C.5.c.iv.).
4. A description of the procedures you use to characterize, trace and eliminate illicit discharges, including spills and illicit connections (S5.C.5.e.i.).
5. A copy of your local stormwater hotline for public reporting of spills and illicit discharges, including reports of spills, illicit discharges, and illicit connections that your jurisdiction received between January 1, 2025, and June 30, 2025 (S5.C.5.d and g).
6. A summary of all staff training related to IDDE, from June 30, 2024-June 30, 2025. Include list(s) of attendees at each training and copies of session agendas, if available (S5.C.5.d.iii and f).

S5.C.9. Municipal Operations and Maintenance

7. Provide documentation of how inspections are conducted and how maintenance is documented. Provide an example of a municipal stormwater treatment and flow control BMP/facility inspection record where required maintenance was identified for reporting year 2024. Provide a second example inspection record where BMP/facility maintenance was not needed (S5.C.9.c.i).
    a. NOTE: If you have reduced the inspection frequency of any municipal stormwater treatment and flow control BMPS/facilities, please include such documentation as well. (S5.C.9.c.i.)
    b. Note which facilities are subject to spot-checks after major storm events and records of any qualifying storm events that triggered this check. (S5.C.9.c.ii)
8. Provide examples of inspection and maintenance records, including checklists or forms used for such inspections for stormwater treatment and flow control BMPs/facilities regulated by the Permittee for the reporting year of 2024 (S5.C.9.b.i(b)). Provide an example of when maintenance was required and when maintenance was not required.
    a. NOTE: If you have reduced the inspection frequency of any municipal stormwater treatment and flow control BMPS/facilities, please include such documentation as well. (S5.C.9.b.i(b)).
    b. Include documentation of the ordinance or other enforceable mechanism that identifies responsibility for maintenance of regulated facilities, requires inspection, and establishes enforcement procedures (S5.C.9.b.i(a)).

9. Provide examples of inspection and maintenance records, including checklists or forms used for such inspections, for all catch basins and inlets owned or operated by the Permittee for the reporting year of 2024 (S5.C.9.c.iii).
    a. NOTE: If you follow an alternative inspection frequency, please include such documentation as well (S5.C.9.c.iii(a-c)).
10. Documentation of practices, policies, and procedures employed to reduce stormwater impacts associated with runoff from lands owned or maintained by the city and road maintenance activities under the functional control of the City/County (S5.C.9.d.).
11. Copies of SWPPPs developed for any heavy equipment maintenance or storage yards, or material storage facilities owned or operated by the City/County in accordance with S5.C.9.f.
12. Records of 2024-2025 O&M trainings conducted for employees whose primary construction, operations, or maintenance job functions may impact stormwater quality. Include list(s) of attendees at each training and copies of training session agendas, if available (S5.C.9.g).

If any of the documents requested are too large, are not available in electronic format, or are otherwise impractical to export and transfer electronically, please let me know. We may ask you to have those documents available on-site for review.

We look forward to your cooperation and discussing your program with you. If you have any questions or need to reschedule the audit date, please call me at 425-758-5096 or email me at: ROGC461@ECY.WA.GOV.

Sincerely,

Roger Chang
Municipal Stormwater Permit Manager
Northwest Region Office

cc: Stella Collier, City of Bainbridge Island (by email)
Abbey Stockwell, Phase II Permit Writer (by email)
SWRO/NWRO permit file

Appendix B:
Decant Facility Inspection Report

Permit Compliance Inspection Report

Water Quality Program

Northwest Region Office

A. General Information

Facility Name and Address	City of Bainbridge Island Decant Facility 6400 Don Palmer Ave Bainbridge Island, WA 98110
Permit Type:	Municipal Stormwater Phase II Western WA GP Permit Number: WAR045503
Permit Effective Dates:	August 1, 2024, to July 30, 2029
Inspection Date and Time:	September 16, 2025, 01:11 PM to 02:55 PM
Discharge to:	Surface Water, Groundwater, MS4
Receiving Water:	Puget Sound
Type of Inspection:	Announced Facility Inspection
Weather:	Sunny, 80°F
Photographs Taken:	☒ Yes ☐ No Samples Taken: ☐ Yes ☒ No

B. Personnel Information

Ecology Representatives:	Roger Chang (Lead Inspector) Amy Waterman (Co-inspector) Angela Vincent (Co-inspector) Evan Dobrowski (Co-inspector)
Facility Representatives:	Stella Collier, Stormwater Management Program Coordinator Email: scollier@bainbridgewa.gov Phone: 206-780-3724 Paul Nylund, Development Engineering/Water Resources Manager Email: pnylund@bainbridgewa.gov Phone: 206-780-3783 Ray Navarette, Public Works Utilities Supervisor Email: rnavarette@bainbridgewa.gov Phone: 206-780-3582 Tom Edwards, Assistant Public Works Director Email: tom.edwards@bainbridgewa.gov Phone: 206-780-3584
Responsible Party/Official:	Blair King, City Manager 280 Madison Ave N Bainbridge Island, WA 98110 Email: bking@bainbridgewa.gov Phone: 206-780-8620

Inspector Signature		Reviewer Signature	
11/20/2025		11/20/2025	
Roger Chang	Date	Jay Fennell	Date
MS4 Permit Planner		Watershed Protection Unit Supervisor	

C. Facility Description and Background

This inspection was conducted as part of an audit of the City of Bainbridge Island's Stormwater Management Program to assess compliance with parts of the Western Washington Phase II Municipal Stormwater Permit (MS4 Permit). The MS4 Permit requires implementation of 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 another NPDES permit. The SWPPP must include:

- A detailed description of the Best Management Practices (BMPs) in use at the facility, which must be consistent with the Stormwater Management Manual for Western Washington (SWMMWW)
- Annual inspections of the facility
- An inventory of materials and equipment stored on-site, and the activities which could result in stormwater pollution
- A site map showing the facility's drainage, discharge points, and areas of potential pollutant exposure
- A plan for preventing and responding to spills at the facility which could result in an illicit discharge

The Bainbridge Island Decant Facility is located at 6400 Don Palmer Ave and serves as the City of Bainbridge Island's (City) primary staging and consolidation site. The facility manages liquids and solids generated from street sweeping, line cleaning, and road maintenance. The facility also serves as storage for surplus vehicles, excavated materials from road maintenance, construction materials (PVC and concrete), and clean materials such as sand, gravel, and mulch.

The facility neighbors a capped landfill managed by Kitsap County Health, and a privately owned waste transfer station operated by Bainbridge Disposal.

D. Inspection Narrative and Observations

1. Permit Documentation and Records Review

Ecology's audit team reviewed the Stormwater Pollution Prevention Plan (SWPPP) for the decant facility in advance of the site visit. The SWPPP addresses essential Best Management Practices (BMP) categories, including operational source control BMPs, good housekeeping, preventative maintenance procedures, spill prevention and Emergency Cleanup Plan, and protocols for employee training, inspections, recordkeeping, and illicit discharges. Additionally, the document includes descriptions of structural BMPs, such as structural source control, treatment BMPs, structural peak runoff rate and volume control BMPs, and erosion and sediment control BMPs. The SWPPP, however, does not mention the current disposal method for collected decant liquids, specifically vactor trucking the liquids to sanitary sewer.

Inspection records provided to the audit team only contained records up to the year 2021. The City confirmed after the site inspection that they were unable to locate inspection records for 2022, 2023, or 2024. While the City verbally confirmed that, at a minimum, they performed annual inspections, they are missing documentation that verifies this. Additionally, according to SWPPP's Appendix B, the City moved to a monthly inspection frequency starting in 2024 but again lack the records from that year to verify this.

2. Site Walkthrough

Decant Facility and Surrounding Yard

The main decant area measures approximately 11,880 square feet and is protected by a canopy structure, which prevents stormwater intrusion. The area features a concrete foundation and slab, including at-grade solids handling areas and below-grade settling vaults. The slab slopes towards the vaults, ensuring liquid containment within the facility's footprint. A concrete stem wall with controlled openings separates the at-grade and below-grade sections; the vaults facility suspended solids settling from collected street waste liquids. Six-foot concrete stem walls enclose the facility on three sides aiding in storage, material drying, and weather protection, and preventing stormwater from contacting decant liquids and solids (photo 1-2).

The floor within the covered decant facility is sloped towards the vaults ensuring any liquid spilled will be diverted to the vaults (photo 3). There are two underground storage vaults that house an estimated total of 7,000 gallons of liquids (photos 4-5). Sweeper and vactor trucks back up to the vaults and release combined liquids and solids into two liquid discharge areas which are mirror images on either side of the center axis of the building (photo 3). Each side has an initial liquid discharge area, first stage settling trench with openings to the second stage settling trench with weirs, and a solids holding/drying area. Liquids are drained to the vault while the solids are mechanically separated and stored (photo 2 and 6). Solids are segregated based on origin and moisture content: street sweeping and catch basin material are stored separately from road and ditch maintenance or excavated material (photo 2). According to the City solid materials are then tested in accordance with the decant facility's permit for solid waste management issued by Kitsap County Health. Evidence of soils stockpiled above the top of the six-foot concrete stem wall was observed (photo 7). We also observed evidence of sediment track out and debris from the covered area onto the adjacent paved surfaces of the decant facility yard (photos 8-9).

The adjacent yard areas are surfaced with asphalt concrete and are sloped to direct runoff away from the decant structure. An underground storm drainage system captures runoff from the surrounding areas. This system conveys stormwater through biofiltration swales then into a stormwater detention pond located on the east side of the property before eventual discharge to surface water.

Liquid Disposal

According to the City, vactor trucks transfer the liquid collected at the decant facility to an off-site sanitary sewer connection for disposal at the publicly owned treatment works (POTW). The City combines and accesses the liquids from both storage vaults through a grated singular vault for vactor removal (photo 10). City staff indicated this procedure has been main disposal method for over ten years. This disposal method is not documented in the current SWPPP. The SWPPP instead describes a historical method involving the use of an onsite oil/water separator, sand filter treatment BMP, biofiltration swale, and stormwater detention pond (photos 11-15).

Material Storage

Various stockpiles of soil and other clean materials are stored across the site. While some stockpiles are covered, (photo 16), others remain exposed. Specifically, a large asphalt storage area downhill from the decant facility contains uncovered stockpiles of clean materials such as sand, gravel, and mulch, leaving them exposed to rainwater and stormwater (photos 17-18). There is no berm or other structural BMP to prevent material carried by runoff from this asphalt storage area from entering two downhill catch basins, which convey untreated stormwater to the on-site stormwater detention pond.

The City stores surplus vehicles in the yard on gravel and vegetation rather than on the impervious asphalt surface. City staff confirmed these vehicles still contain fluids, and an Ecology inspector observed a fluid leak from one vehicle (photos 19-20). Additionally, the City stores miscellaneous equipment, materials, and containers uncovered near the decant facility entrance, including unlabeled empty drums, totes, lawn mowers, PVC and concrete materials (photo 21).

Illicit Discharge

During the site visit, while observing the decant liquid removal process, the audit team and City staff accessed the oil/water separator manhole structure leading to the inactive sand filter treatment system. Although the City stated that the valve controlling the outlet leading to the treatment system was closed, the audit team observed water within access manhole and heard running water (photo 10). The audit team then confirmed that the sand filter was inundated (photo 22) with water by observing water ponding at the outlet pipe leading to the biofiltration swale (photo 23). While the audit team did not observe water flowing further downstream, the vegetation within the swale appeared distinctly greener than the surrounding area, which had dead vegetation as expected at the end of the dry summer season (photo 13).

Following the inspection, the City performed an immediate investigation and reported the findings to Ecology on September 23, 2025. The City reported that the valve controlling the flow to the sand filter was open, and that the duration and reason for the open valve is unknown. To prevent reoccurrence, the City capped the line on September 24, 2025, and confirmed that the standard operational procedure of trucking decant liquids to the sanitary sewer would continue.

General Operations and Maintenance

The City maintains several spill kits strategically located across the site, including one within the spill trailer on the asphalt pad, one at the walkway between the two decant liquid vaults, and one located at the small office building near the decant facility entrance. The site contains a total of seven catch basins outside the covered decant area, all of which collect stormwater from the uncovered yard and convey it through the biofiltration swale and into the stormwater detention pond (photos 13-14). Each of the five catch basins directly observed contained a filter sock. The City stated during the inspection that they sweep the paved yard areas quarterly and replace the filter socks as needed. The covered portion of the decant facility permanently houses a mechanical. Mobile fueling activities occur exclusively within the covered area for the mechanical loader (photo 2). The City stated no vehicle maintenance or exterior vehicle washing occurs at this facility. The city washes the interior debris holding tanks on street sweepers within the covered areas of the facility.

E. Areas of Potential Non-Compliance

Based on the information reviewed and observations made during the inspection, it appears that the City is not in compliance with the following permit requirements:

SWPPP Revision

- Update the decant facility SWPPP to accurately reflect the current and ongoing operational activities, including the procedure for vactor trucking decant liquids to the sanitary sewer for off-site disposal and the status of the inactive treatment BMPs. (S5.C.9.f.i)

Source Control and Good Housekeeping

- Review and implement in accordance with the SWMMWW S429 BMPs for Storage or Transfer (Outside) of Solid Raw Materials, Byproducts, or Finished Products, appropriate BMPs to ensure that all erodible materials stored in uncovered areas are protected from contact with stormwater or collecting runoff to ensure that no direct discharge of contaminated stormwater to catch basins exists without conveying runoff through an appropriate treatment BMP. (S5.C.9.f.ii)
- Ensure that soil stockpiles are maintained below the six-foot concrete stem walls within the decant facility to preserve containment. (S5.C.9.f.ii)
- Ensure that surplus vehicles and equipment stored onsite that contain fluids either be removed or have appropriate secondary containment beneath them in accordance with the SWMMWW S102 BMPs for Preventative Maintenance and Good Housekeeping. (S5.C.9.f.v)
- Prevent track out of sediment and debris from the decant facility to the adjacent paved surfaces in accordance with the SWMMWW S102 BMPs for Preventative Maintenance and Good Housekeeping. (S5.C.9.f.ii)
- Ensure that all drums and storage containers located on site are properly labeled, regardless of content or whether they are empty. (S5.C.9.f.ii)

Documentation

- The City shall record and keep inspection documents for at least five years after the Permit's expiration date. The Permit expires July 31, 2029. (S5.C.9.f.ii, S9.B)

F. Conclusion

Please follow up with your Ecology Permit Planner upon receipt of this report. If the City confirms that any permit requirements were not met, General Condition G20 of the Permit requires submittal of a non-compliance notification within 30 days of becoming aware of the non-compliance. If the City determines that a non-compliance notification is not required for any Areas of Potential Non-Compliance identified, please include your reasoning in an email to your Ecology Permit Planner within 30 days.

If you have any questions or concerns regarding this inspection report, please contact Roger Chang at Roger.Chang@ecy.wa.gov or 425-758-5096.

ADA Accessibility

The Department of Ecology (Ecology) is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at (360) 407-6831 or email at ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or (877) 833-6341. Visit Ecology's website for more information.

Photo [1]
Description: Entrance to decant facility.

Photo [2]
Description: Street waste solids storage and drying, right side of facility.

Photo [3]
Description: Decant tipping floor.

Photo [4]
Description: Decant liquid settling vault, left side of the facility.

Photo [5]
Description: Decant liquid settling vault, right side of the facility.

Photo [6]
Description: Soil stockpile generated from road maintenance activities. Loader used to move and load soil for offsite disposal. Soil stockpiled above concrete stem wall.

Photo [7]
Description: Soil stockpiled above six-foot cement stem wall containment.

Photo [8]
Description: Evidence of track out leaving the decant facility to rest of yard. Moisture on ground was due to street sweeper filling up water tank

Photo [9]
Description: Additional evidence of track out of sediment and debris leaving the decant facility to rest of the site.

Photo [10]
Description: Subsurface decant liquid vault with manhole to oil water separator. Also, location where liquid is removed for disposal.

Photo [11]
Description: Oil/water separator filled with water. We heard the sound of water moving water.

Photo [12]
Description: Sand filter down stream of oil/water separator.

Photo [13]
Description: View of sand filter and its location to decant facility.

Photo [14]
Description: Bio-filtration Swale down stream of sand filter.

Photo [15]
Description: Stormwater detention pond, down stream of bio-filtration swale.

Photo [16]
Description: Properly covered soil stockpile generated from maintenance activities. Stockpile to be removed for disposal.

Photo [17]
Description: Uncovered erodible stockpile within close proximity to a catch basin with insert.

Photo [18]
Description: Uncovered erodible stockpile located on asphalt pad south of decant facility.

Photo [19]
Description: Equipment storage including surplus vehicles. Located on gravel.

Photo [20]
Description: Evidence that one of the surplus vehicles is leaking fluid.

Photo [21]
Description: Construction material storage (PVC and Concrete). Connex boxes are used to store spill material, and Police Department equipment.

Photo [22]
Description: Sand filter inundated with water.

Photo [23]
Description: Ponded water at outlet from sand filter.

Appendix C:
Audit Day of Agenda

Final Agenda for MS4 Program Audit

City of Bainbridge Island, Washington

September 16, 2025

ECY Staff: Roger Chang (NWRO Permit Planner), Angela Vincent (SWRO Permit Planner), Amy Waterman (Phase I Permit Writer), Evan Dobrowski (NWRO ISGP Inspector)

Time	Agenda Topic	Staff
9:30 am - 10:00 am	Introductions, Audit Program overview, and agenda review.	All (ECY, City Staff)
10:00 am - 10:50 am	IDDE program: Interview appropriate staff and review records.	Ecology and Select City staff
10:50 am – 11:00 am	Break	
11:00 am - 11:50 am	Municipal Operations and Maintenance program: Interview appropriate staff and review records	Ecology and Select City staff
11:50 am - 12:00 pm	Morning recap and plan for afternoon field visit(s)	All
12:00 pm - 1:00 pm	Lunch	
1:00 pm – 2:30 pm	Municipal Operations and Maintenance: Visit maintenance yard	Ecology w/Evan D. and Select City staff
2:30 pm - 2:45 pm	Ecology inspectors' internal discussion	No city staff expected
2:45 pm - 3:00 pm	Closing conference: Initial observations and next steps	All