

MS4 Annual Report Phase I City County

| Number | Permit Section | Question |
|--------|----------------|---|
| 1 | S9.D.6. | <p>Attach a map of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.</p> <p>Not Applicable</p> |
| 2 | S9.D.1, S5.A.1 | <p>Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S9.D.1, S5.A.1)</p> <p>Q2_2025 SWMP Plan_Final_March _2_03262025123652</p> |
| 3 | S5.A.2. | <p>No later than March 31, 2027, implemented an ongoing program to gather, track, and maintain information per S5.A.2, including costs or estimated costs of developing and implementing the SWMP?</p> <p>Not Applicable</p> <p>Comment: Existing program was implemented during 2024. Updates to the program as well the submittal of the costs/cost estimates will be provided by 3/31/2027, per S5.A.2.</p> |
| 4 | S9.D4 | <p>If applicable, identify other entities relied on to satisfy any of the obligations under the Permit. (S9.D4).</p> <p>Not Applicable</p> |
| 5 | S5.C.2.a | <p>Maintained electronic mapping data for the features listed in S5.C.2.a?</p> <p>No</p> <p>Comment: See response to Question 104, which references the G20 notification submitted to Ecology on 11/7/2024.</p> |
| 11 | S.5.C.3.a | <p>Did you update your internal coordination agreement(s) or directives to facilitate compliance with this permit? (S.5.C.3.a) (Required by March 31, 2025)</p> <p>No</p> <p>Comment: The City's Executive Order documenting the internal coordination agreements/directives was reviewed during 2024 and determined to not require updating.</p> |
| 12 | S5.C.3.b.i | <p>Implemented coordination mechanisms clarifying roles and responsibilities for control of pollutants between physically interconnected MS4s per S5.C.3.b.i?</p> <p>Yes</p> |
| 13 | S5.C.3.b.ii | <p>Coordinated stormwater management activities for shared waterbodies among Permittees and Secondary Permittees, as necessary to avoid conflicting plans, policies and regulations? (S5.C.3.b.ii)</p> <p>Yes</p> |
| 14 | S5.C.4.a | <p>Describe in Comments field opportunities created for the public, including overburdened communities, to participate in the decision making processes involving the development,</p> |

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|--------|-----------------|--|
| | | <p>implementation and updates of the SWMP and SMAP (SMAP applies to Counties). (S5.C.4.a).</p> <p>SPU provides information on the stormwater management program plan on its public website (http://www.seattle.gov/utilities/documents/plans/drainage-and-sewer-plans/stormwater-mgmt-plan) and provides an email (swmp@seattle.gov) that the public can use to ask questions and get more information about the stormwater management program plan. SPU also facilitates the Strategic Business Plan Customer Review Panel, providing an on-going opportunity for citizens to participate in planning and development of policies and programs.</p> |
| 14a | S5.C.4.a.i | <p>Annually document specific public involvement and participation opportunities provided to overburdened communities, including highly impacted communities (e.g., federally recognized tribes). (S5.C.4.a.i)</p> <p>The City provided the following opportunities during 2024: - Duwamish River Festival presence/engagement - South Park Water Quality Facility engagement process - Tree stewardship along Longfellow Creek - Highpoint youth interns engagement - Tree planting and care workshop in Rainier Beach and South Seattle College - Mulch giveaway at South Seattle College Georgetown - Duwamish boat trips for elementary schools in south Seattle - Supported an Environmental justice forum for Duwamish Valley Youth Corps - Hosted Stormdrain stenciling events in Georgetown and Lake City</p> |
| 15 | S5.C.4.b | <p>Posted the updated SWMP Plan and latest annual report on your website no later than May 31? (S5.C.4.b)</p> <p>Yes</p> |
| 15a | S5.C.4.b | <p>List website address in Comments field.</p> <p>https://www.seattle.gov/utilities/about/plans/drainage-and-sewer/stormwater-management-plan</p> |
| 18 | S5.C.5.b.i | <p>Number of adjustments granted to the minimum requirements in Appendix 1? (S5.C.5.b.i, and Section 5 of Appendix 1)</p> <p>0</p> |
| 19 | S5.C.5.b.i | <p>Number of exceptions granted to the minimum requirements in Appendix 1? (S5.C.5.b.i, and Section 6 of Appendix 1)</p> <p>0</p> |
| 20 | S5.C.5.b.vi.(a) | <p>Reviewed Stormwater Site Plans per S5.C.5.b.vi.(a).</p> <p>Yes</p> |
| 20a | S5.C.5.b.vi(a) | <p>Number of stormwater site plans reviewed during the reporting period? S5.C.5.b.vi(a)</p> <p>1628</p> |
| 21 | S5.C.5.b.vi.(b) | <p>Inspected, prior to clearing and construction, permitted development sites per S5.C.5.b.vi.(b)?</p> <p>Yes</p> |
| 22 | S5.C.5.b.vi.(c) | <p>Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.5.b.vi.(c)?</p> <p>Yes</p> |

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|---------------|-----------------------|---|
| 23 | S5.C.5.b.vi.(d) | Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments twice per 12-month period, with no less than four months between inspections, per S5.C.5.b.vi.(d)? Yes |
| 24 | S5.C.5.b.vi.(e) | Inspected permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of stormwater facilities per S5.C.5.b.vi.(e)? Yes |
| 25 | S5.C.5.b.vi.(e) | Verified that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities prior to final approval and occupancy being granted? (S5.C.5.b.vi.(e)) Yes |
| 26 | S5.C.5.b.vi.(e) | Number of enforcement actions taken during the reporting period? (Based on all construction and post-construction phase inspections at new development and redevelopment projects.) (S5.C.5.b.vi.(b)- (e)) 610 |
| 27 | S5.C.5.b.vi.(f) | Achieved at least 80% of required construction-related inspections? (S5.C.5.b.vi.(f)) Yes |
| 28 | S5.C.5.b.vii | Made online links to Ecology's Construction Stormwater General Permit Notice of Intent, the Industrial Stormwater General Permit Notice of Intent, and the registration requirements for Underground Injection Control (UIC) wells available to representatives of proposed new development and redevelopment? (S5.C.5.b.vii) Yes |
| 29 | S5.C.5.b.viii | All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites are trained to conduct these activities? (S5.C.5.b.viii) Yes |
| 30 | S5.C.6.a | Continued to convene an interdisciplinary team to inform and assist in the development, progress, and influence of the stormwater planning program? (S5.C.6.a) Yes |
| 36 | S5.C.6.c.i | Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.6.c.i. (Required annually) Yes |
| 37 | S5.C.6.c.i.(a) | From the assessment described in S5.C.6.c.i.(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually) No |
| 39 | S.5.C.6.d.i | Counties Only: Described in your SWMP how the watershed-scale stormwater plans (developed in the 2013-2019 Permit) are being used to inform S5.C.7 project prioritization and selection? (S.5.C.6.d.i) Not Applicable |

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| 42 | S5.C.7.c | <p>Attach a list of planned, individual projects scheduled for implementation during this permit term for the purpose of meeting S5.C.7.d, with the information and formatting specified in Appendix 12? (S5.C.7.c)</p> <p>Q42_SMED Project List_2024_ECY_42_03262025122828</p> |
| 44 | S5.C.8.b | <p>Updated inventory to identify commercial and industrial properties which have the potential to generate pollutants to the Permittee's MS4 per S5.C.8.b? (Required once every five years.)</p> <p>Yes</p> |
| 44a | S5.C.8.a | <p>Number of total sites identified for inventory?</p> <p>1823</p> |
| 45 | S5.C.8.a-d | <p>Attach a summary of actions taken to implement the source control program per S5.C.8.a.-d.</p> <p>Q45_Source Control Summary 202_45_03252025145418</p> |
| 46 | S5.C.8.b., c. | <p>Attach a list of inspections per S5.C.8.b, organized by the business groups, noting the number of times each business was inspected, and if enforcement actions were taken, per S5.C.8.c.i.-v.</p> <p>Q46_MS4 Business Inspections 2_46_03252025145419</p> |
| 47 | S5.C.8.e. | <p>Implemented an ongoing source control training program per S5.C.8.e?</p> <p>Yes</p> |
| 48 | S5.C.9.b | <p>Continued to implement the regulatory mechanisms to effectively prohibit illicit discharges into the MS4 per S5.C.9.b.</p> <p>Yes</p> |
| 50 | S5.C.9.c.i | <p>Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.9.c.i?</p> <p>Yes</p> |
| 50a | S5.C.9.c.i | <p>Cite field screening methodology used in the Comments field.</p> <p>SPU IDDE QAPP: The general approach to field screening is to begin at an accessible location at or near the discharge point of a drainage basin, such as an outfall, key maintenance hole, ditch, or other structure. Field screening is performed at multiple key locations in most drainage basins instead of relying on elevated concentrations to be found only at the downstream discharge point. The size of the drainage basin is used to determine the number of locations screened. Key upstream maintenance holes representing major branches of the conveyance system are screened in larger basins in order to decrease the size of the area screened by an individual sample. The purpose of this approach is to help detect discharges that may be diluted and, therefore, masked by groundwater intrusion or blended flows. See Appendix B of the SWMP for additional details.</p> |
| 51 | S5.C.9.c.i(a) | <p>Provide the percentage of MS4 screened in reporting year per S5.C.9.c.i(a). (Required to screen 12% each year.)</p> <p>13</p> |
| 51a | S5.C.9.c.i(a) | <p>Cite field screening techniques used to determine percent of MS4 screened.</p> |

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|--------|----------------|--|
| | | <p>Drainage basins are selected and screened systematically until complete, starting from near the outfall and working upstream, with a focus on a maximum of a few basins at any one time. Basins are sampled at major piped junctions until a thorough coverage of the basin is screened, and until it is determined that all dry weather flow that can be sampled has been sampled. Any trigger values are investigated to determine potential sources, and all discovered illicit discharges or connections are resolved. Upon completion of the dry weather season, all basins completed are selected and geographically compared to the total MS4 drainage area in the City. The area completed is determined as a percentage of the total area of the MS4 coverage. See Appendix B of the SWMP for additional details.</p> |
| 52 | S5.C.9.c.ii | <p>Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field (S5.C.9.c.ii).</p> <p>Public reporting of spills and other illicit discharges can occur through two means: (1) The water quality complaint hotline phone number is advertised through distributed media (magnets and fliers) at community events and during inspections conducted by SPU Source Control staff. Additionally, it is featured prominently in a variety of locations on the City of Seattle website and the SPU website. We have found that the public likes to utilize digital options, so SPU has also provided an online reporting form as well as the Find It, Fix It app. Complaints submitted through these means generate a pollution report that's directed to SPU Source Control Team, which includes the Spill Response Program. The webpage lists the phone number (206-684-7587) and a link to the online form: https://www.seattle.gov/utilities/protecting-our-environment/seattle-clean-city/report-pollution (2) For immediate or time-critical issues/response (e.g., pollution of the drainage system or a waterbody, surface flooding in a street, chemical spills, or a leak on public property), the public is asked call SPU's Operations Response Center at 206-386-1800. The ORC is staffed 24/7 and is able to dispatch Spill Responders, field crews, and other City Departments as needed.</p> |
| 53 | S5.C.9.c.iii | <p>Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.9.c.iii?</p> <p>Yes</p> |
| 54 | S5.C.9.d | <p>Updated an ongoing program to address illicit discharges, including spills, and illicit connections into the MS4 per S5.C.9.d?</p> <p>Not Applicable</p> <p>Comment: Continued to implement the existing program, per S5.C.9.d.</p> |
| 55 | S5.C.9.e | <p>Implemented an ongoing illicit discharge training program for all staff responsible for the procedures and program, per S5.C.9.e?</p> <p>Yes</p> |
| 56 | S5.C.9.f | <p>Participated in a regional emergency response program, or implemented procedures to investigate and respond to spills and improper disposal? (S5.C.9.f)</p> <p>Yes</p> |
| 57 | S5.C.9.g | <p>Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the permittee as described in S5.C.9.g. The submittal must include all of the applicable information and must follow the format described in Appendix 14.</p> <p>Imported from WQWebIDDE</p> |
| 58 | S5.C.10.a | <p>Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington, or a Phase I program approved by Ecology? (S5.C.10.a)</p> <p>Yes</p> |

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|--------|----------------|--|
| 60 | S5.C.10.a | <p>Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.10.a)</p> <p>Yes</p> <p>Comment: The City owns/operates some proprietary BMP technologies, such as Filterra and BayFilter units. For these, the City follows the manufacturer's recommended maintenance standards.</p> |
| 61 | S5.C.10.a.ii | <p>Verified that maintenance was performed, per the schedule in S5.C.10.a.ii, when an inspection identified an exceedance of the maintenance standard.</p> <p>No</p> <p>Comment: Catch basin maintenance standard was not met in 2024 for less than 1% of the City's inventory. This was discovered in Q1 2025 and an associated G20 notification letter will be submitted to Ecology within 30 days of becoming aware of the non-compliance.</p> |
| 63 | S5.C.10.b.ii | <p>Implemented an ongoing inspection program for stormwater facilities regulated by the Permittee per S5.C.10.b.ii.</p> <p>Yes</p> |
| 63a | S5.C.10.b.iii | <p>Are you using a reduced inspection frequency? (S5.C.10.b.iii)</p> <p>Yes</p> |
| 63b | S5.C.10.b.iii | <p>If using a reduced inspection frequency on stormwater facilities regulated by the Permittee for the first time during this permit cycle, attach documentation per S5.C.10.b.iii.</p> <p>Not Applicable</p> <p>Comment: In 2011, the City of Seattle submitted documentation for a reduced inspection frequency for private stormwater facility inspections and continues to operate under this approach.</p> |
| 64 | S5.C.10.b.iv | <p>Achieved at least 80% of inspections required? (S5.C.10.b.iv)</p> <p>Yes</p> |
| 65 | S5.C.10.c.i | <p>Number of known stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee? (S5.C.10.c.i)</p> <p>1479</p> |
| 65a | S5.C.10.c.i | <p>Number of these BMPs/facilities inspected during the reporting period?? (S5.C.10.c.i)</p> <p>1464</p> |
| 65b | S5.C.10.c.i | <p>Number of these BMPs/facilities for which maintenance was performed during the reporting period?? (S5.C.10.c.i)</p> <p>1270</p> |
| 66 | S5.C.10.c.ii | <p>If using reduced inspection frequency for municipally owned or operated stormwater treatment and flow control BMPs/facilities for the first time during this permit cycle, attach documentation per S5.C.10.c.ii.</p> <p>Not Applicable</p> |

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|---------------|-----------------------|---|
| 67 | S5.C.10.c.iii | Conducted spot checks and inspections of potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events? (S5.C.10.c.iii) Yes |
| 68 | S5.C.10.c.iv | Achieved at least 95% of required inspections per S5.C.10.c.iv? Yes |
| 69 | (S5.C.10.d.i | Inspected catch basins owned or operated by the Permittee every year or used an alternative approach? (S5.C.10.d.i) Yes |
| 69a | (S5.C.10.d.i | Number of known catch basins and inlets? 24005 |
| 69b | (S5.C.10.d.i | Number of catch basins and inlets inspected during the reporting period? 23269 |
| 69c | (S5.C.10.d.i | Number of catch basins and inlets cleaned during the reporting period? 4279 |
| 70 | (S5.C.10.d.i | Attach documentation of alternative catch basin inspection approach, if used. (S5.C.10.d.i.) Not Applicable |
| 71 | S5.C.10.d.ii | Disposed of decant water in accordance with the requirements in Appendix 6 – Street Waste Disposal. (S5.C.10.d.ii) Yes |
| 72 | S5.C.10.e | Implemented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee per S5.C.10.e. Yes |
| 78 | S5.C.10.g | Implemented a Stormwater Pollution Prevention Plan for all heavy equipment maintenance or storage yards, and material storage facilities, owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that authorizes stormwater discharges associated with the activity per S5.C.10.g? Yes |
| 79 | S5.C.10.h | Implemented an ongoing training program for employees of the Permittee whose primary construction, operations or maintenance job functions may impact stormwater quality per S5.C.10.h? Yes |
| 80 | S5.C.11 | Did you choose to adopt one or more elements of a regional program? (S5.C.11) Yes |

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|--------|----------------|---|
| 80a | S5.C.11 | <p>If yes, list the elements, and the regional program.</p> <p>SPU participated in the regional Stormwater Outreach for Regional Municipalities (STORM) coalition and Puget Sound Starts Here collaborative. As an active member of both, we: - Contributed to the digital advertising campaign for Puget Sound Starts Here month in September, 2024. - Participated on the steering committees for both STORM and Puget Sound Starts Here. - Participated in the Regional Adopt-A-Drain Group, which includes MS4 Permittees in the Puget Sound area who implement the Adopt-A-Drain Program in their jurisdiction. Monthly meetings are a tool to share strategies developed or in development, actions taken, lessons learned, and collaboration opportunities, in an effort to support consistent Program messaging across the region. - Participated as a panel member at the Annual STORM Symposium, sharing the City's experience evaluating the Adopt-A-Drain Behavior Change Program. See 2024 E&O General Awareness Report (Annual Report Question 81) for more details.</p> |
| 81 | S5.C.11.a.i | <p>Attach description of public education and outreach general awareness efforts conducted, including your priority audiences and subject areas, per S5.C.11.a.i.</p> <p>Q81_General Awareness Report_2_81_03262025123146</p> |
| 85 | S5.C.11.a.iii | <p>Provided, partnered, or promoted stewardship opportunities to encourage resident or business participation in activities such as those described in S5.C.11.a.iii?</p> <p>Yes</p> |
| 85a | S5.C.11.a.iii | <p>Attach a list of stewardship opportunities.</p> <p>Q85a_Stewardship Opportunities_85a_03252025160347</p> |
| 86 | S7.A | <p>Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2? (S7.A)</p> <p>Not Applicable</p> |
| 86a | S7.A | <p>List any requirements that were not met.</p> <p>Not Applicable</p> |
| 87 | S7.A | <p>For TMDL listed in Appendix 2, attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)</p> <p>Not Applicable</p> |
| 88 | S8.A | <p>Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2024 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a)</p> <p>Yes</p> |
| 89 | S8.A.2 | <p>Notified Ecology by December 1, 2024 which option you selected: S8.A.2.a, or S8.A.2.b?</p> <p>Yes</p> |
| 90 | S8.B.2 | <p>Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2024 (S8.B.1); and no later than August 15 of each subsequent year? (S8.B.2.a or S8.B.2.c)</p> <p>Yes</p> |
| 91 | S8.B.2 | <p>Notified Ecology by December 1, 2024 which option you selected: S8.B.2.a, or S8.B.2.b, or S8.B.2.c?</p> |

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|---------------|-----------------------|---|
| | | Yes |
| 94 | S8.B.2.c.ii.(c) | If conducting a study per S.8.B.2.c, began full implementation of the effectiveness in accordance with the schedule in the approved QAPP, and submitted required reports? (S8.B.2.c.ii.(c)) Not Applicable |
| 98 | G3 | Notified Ecology in accordance with G3 of any discharge into or from the Permittee's MS4 which could constitute a threat to human health, welfare or the environment? (G3) Yes |
| 99 | G3.A | Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A? Yes |
| 100 | S4.F.1 | Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water? (S4.F.1) Yes |
| 101 | S4.F.3.a | If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a? Not Applicable Comment: No new Adaptive Management Response reports were requested per S4.F.3.a during 2024. However, the City of Seattle's draft 2026-2031 Source Control Implementation Plan (text, plus appendices and a map atlas) has been uploaded to the WQWebPortal in the "as-needed submittals" section under S4.F.3 since that appeared to be the most appropriate location on the Portal. |
| 102 | S4.F.3.d | Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period? (S4.F.3.d) Q102_Actions Taken Pursuant to_102_03252025160839 |
| 103 | G20 | Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance? (G20) Yes |
| 104 | G20 | Number of non-compliance notifications (G20) provided in reporting year? List permit conditions described in non-compliance notification(s) in Comments field. 1 Comment: On November 7, 2024, the City of Seattle submitted a G20 Notification to Ecology for non-compliance with Special Condition S5.C.2.c of the 2024 Permit, for failing to fully electronically map City-owned or operated MS4 facilities. Specifically, the City determined that it had not fully electronically mapped City-owned or operated MS4 facilities located outside the Seattle city limits but within the coverage area of other Phase I or II Permittees (see Permit condition S1.F). |

Attachments:

View Files Attached to Submission

| | DocDescr | DocName | DocExt | DocID | SubID | AppName |
|----------------------|--|--|--------|---------|---------|-------------|
| View | Submitted Copy of Record for Seattle Public Utilities | Copy of Record SeattlePublicUtilities Thursday March 27 2025 | .pdf | 1651572 | 1957977 | wqwebportal |
| View | Submitted Cover Letter for Seattle Public Utilities | Cover Letter SeattlePublicUtilities Thursday March 27 2025 | .pdf | 1651573 | 1957977 | wqwebportal |
| View | WAR044503_102_03262025123532 | Q102_Actions Taken Pursuant to_102_03262025123532 | .pdf | 1650662 | 1957977 | wqwebportal |
| View | WAR044503_102_Attachment A-Sample Data | Q102_Attachment A LDW Sample Data_2024 | .pdf | 1650361 | 1957977 | wqwebportal |
| View | WAR044503_2_03252025144324 | Q2_2025 SWMP Plan_Final_March_2_03252025144324 | .pdf | 1650309 | 1957977 | wqwebportal |
| View | WAR044503_2_03262025123652 | Q2_2025 SWMP Plan_Final_March_2_03262025123652 | .pdf | 1650663 | 1957977 | wqwebportal |
| View | WAR044503_42_03262025122828 | Q42_SMED Project List_2024_ECY_42_03262025122828 | .xlsx | 1650657 | 1957977 | wqwebportal |
| View | WAR044503_45_03252025145418 | Q45_Source Control Summary 202_45_03252025145418 | .pdf | 1650315 | 1957977 | wqwebportal |
| View | WAR044503_46_03252025145419 | Q46_MS4 Business Inspections 2_46_03252025145419 | .pdf | 1650316 | 1957977 | wqwebportal |
| View | WAR044503_81_03252025160336 | Q81_General Awareness Report_2_81_03252025160336 | .pdf | 1650356 | 1957977 | wqwebportal |
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