



**MAINTENANCE FACILITY
STORMWATER
POLLUTION PREVENTION PLAN**

Marci Chew

Stormwater Specialist

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TABLE OF CONTENTS

CITY OF MILL CREEK MAINTENANCE FACILITY STORMWATER POLLUTION PREVENTION PLAN

<i>Section</i>	<i>Page</i>
SECTION 1 : INTRODUCTION	1
1.1 ORGANIZATION OF THE STORMWATER POLLUTION PREVENTION PLAN.....	1
1.2 STORM WATER REGULATORY FRAMEWORK.....	1
1.3 REVIEW AND REVISION OF THE STORMWATER POLLUTION PREVENTION PLAN	2
SECTION 2 : FACILITY ASSESSMENT	3
2.1 OVERVIEW OF FACILITY AND OPERATIONS	3
2.2 FACILITY DRAINAGE	3
2.3 DESCRIPTION OF MAINTENANCE FACILITY ACTIVITIES.....	4
2.3.1 City Vehicle Storage and Maintenance.....	4
2.3.2 Recycling and Waste Disposal	4
2.3.3 Liquid Material Storage	4
SECTION 3 : BEST MANAGEMENT PRACTICES	5
3.1 CURRENT AND REQUIRED BMPs FOR FACILITY ACTIVITIES	5
3.1.1 What are BMPs?	5
3.1.2 Good Housekeeping.....	8
3.1.3 Treatment BMPs.....	9
3.1.4 Recommended Structural BMP Implementation Schedule	9
3.1.5 Spill Prevention and Response.....	9
3.1.6 Pollution Prevention Team.....	10
3.1.7 Training for Facility Personnel.....	11
SECTION 4 : MONITORING (VISUAL INSPECTIONS)	11
4.1 DRAINAGE CHARACTERISTICS	11
4.2 QUARTERLY WET AND DRY WEATHER VISUAL INSPECTIONS.....	12
4.3 ANNUAL BMP EVALUATION.....	13
4.4 SWPPP REVISIONS.....	13
APPENDIX A: INSPECTION AND REPORTING FORMS	14
APPENDIX B: TRAINING DOCUMENTATION	ERROR! BOOKMARK NOT DEFINED.

LIST OF TABLES
CITY OF MILL CREEK
MAINTENANCE FACILITY STORMWATER
POLLUTION PREVENTION PLAN

<i>Table</i>	<i>Page</i>
Table 3-1: Current and Recommended BMPs for Maintenance Facility Activities.....	7
Table 3-2: General Good Housekeeping Practices	8
Table 3-3: Pollution Prevention Team.....	10

LIST OF FIGURES

<i>Figure</i>	<i>Follows Page</i>
Figure 2-1: Site Drainage Patterns	4
Figure 2-2: Facility Site Map.....	4

LIST OF ABBREVIATIONS

BMP	Best Management Practice
CB	Catch Basin
CMP	Corrugated Metal Pipe
CWA	Clean Water Act
EPA	Environmental Protection Agency
MH	Manhole
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollution Discharge Elimination System
Phase II Permit	Department of Ecology's Western Washington Phase II Municipal Stormwater Permit
SWPPP	Stormwater Pollution Prevention Plan
DOE	Washington State Department of Ecology

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SECTION 1: INTRODUCTION

This document is the Stormwater Pollution Prevention Plan (SWPPP) developed for The Maintenance Facility located at City Hall, 15728 Main Street, Mill Creek, WA 98012.

This facility falls under the jurisdiction of the City of Mill Creek Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Phase 2 Permit, August 1, 2013.

1.1 ORGANIZATION OF THE STORMWATER POLLUTION PREVENTION PLAN

Section 1 of this SWPPP provides information regarding storm water - regulations, the requirements of the 2013 NPDES Phase II permit, review and revision of the SWPPP, and availability of the SWPPP as a public document. Section 2 discusses the operation and activities conducted at the Facility. This section also briefly describes the site drainage patterns and where runoff is discharged once it leaves the site. Section 3 provides a general discussion of Best Management Practices (BMPs) and identifies those BMPs that are implemented throughout the Facility.

1.2 STORM WATER REGULATORY FRAMEWORK

In 1972 the Federal Water Pollution Control Act (known as the Clean Water Act) was amended to effectively prohibit discharge of pollutants to “waters of the United States” from any point source unless the discharge is in compliance with an NPDES Permit. The United States Environmental Protection Agency (EPA) has delegated administration of the NPDES Program within Washington State to the Washington State Department of Ecology (DOE). The 1987 amendments of the Clean Water Act added Section 402(p), which established the framework for regulating discharges of pollutants via storm water from industrial activities and MS4s. Section 402(p)

required the EPA to develop permitting regulations for stormwater discharges from MS4s and from industrial facilities, including construction sites.

This SWPPP applies to the City of Mill Creek Maintenance Facility located at City Hall, 15728 Main Street, Mill Creek, WA 98012. This SWPPP identifies actions that Facility staff will take to comply with the terms and conditions of the Phase II Permit. This SWPPP is required to be developed for the Facility under the City's Phase II Permit by February 16, 2010, in accordance with permit condition S5.C.5.i.

1.3 REVIEW AND REVISION OF THE STORMWATER POLLUTION PREVENTION PLAN

The SWPPP will be reviewed at least annually to determine if any revision is necessary to reflect changes in the Facility or changes in the activities conducted that:

- May significantly increase the quantities of pollutants in storm water runoff;
- Cause a new area of the Facility to be exposed to storm water or authorized non-storm water discharges; or
- Start-up of an activity that would introduce a new pollutant source at the Facility.

In determining if revision of the SWPPP is necessary, the Maintenance Supervisor will review the Annual Facility/Activity Stormwater Assessment, which is described in Section 4.

SECTION 2: FACILITY ASSESSMENT

2.1 OVERVIEW OF FACILITY AND OPERATIONS

The City's Maintenance Facility is located at City Hall, 15728 Main Street, Mill Creek, WA 98012 and encompasses the shop area in the southwest corner of the building as well as the south portion of the City Hall parking lot.

2.2 FACILITY DRAINAGE

The Maintenance Facility is located in the south west corner of the City Hall building. The building is surrounded by asphalt parking areas on the west, south and east sides with a separate building structure located to the north. The topography is generally flat with the predominant slope to the south. Runoff from the roof is conveyed in a pipe conveyance system and does not contribute to the surface flows in the parking lot. The parking lot sheet flows to the south where it is collected in a series of catch basins and a 12x6 Filterra unit.

The drainage system was designed so that all the water from the parking lot enters into the 12x6 Filterra unit and then the storm water goes to Pond 6. Once the surface flow enters the catch basins it enters the conveyance system that serves the adjacent building and parking to the north of City Hall. The conveyance system on site flows to the south east via an 18-inch storm drain pipe. This 18-inch storm drain pipe is connected to a 24-inch corrugated metal pipe (CMP) at the southeast corner of the parking lot, this 24-inch pipe flows to the south and the system eventually outfalls into Pond 6, a regional stormwater facility constructed as part of the commercial property site development. Discharge from the Pond 6 is dispersed into wetlands that are adjacent to North Creek. See Figure 2-1.

2.3 DESCRIPTION OF MAINTENANCE FACILITY ACTIVITIES

2.3.1 City Vehicle Storage and Maintenance

The Facility Parks and Recreation Maintenance Department uses a portion of the City Hall parking lot to store vehicles and equipment used by the maintenance staff as well as city police. The vehicle types range from a police cruiser to street sweepers. Vehicles are stored in designated parking spots. Maintenance of city vehicles is performed off-site by professional mechanics. The city does maintain small amounts of antifreeze and motor oil for topping off the vehicles when needed.

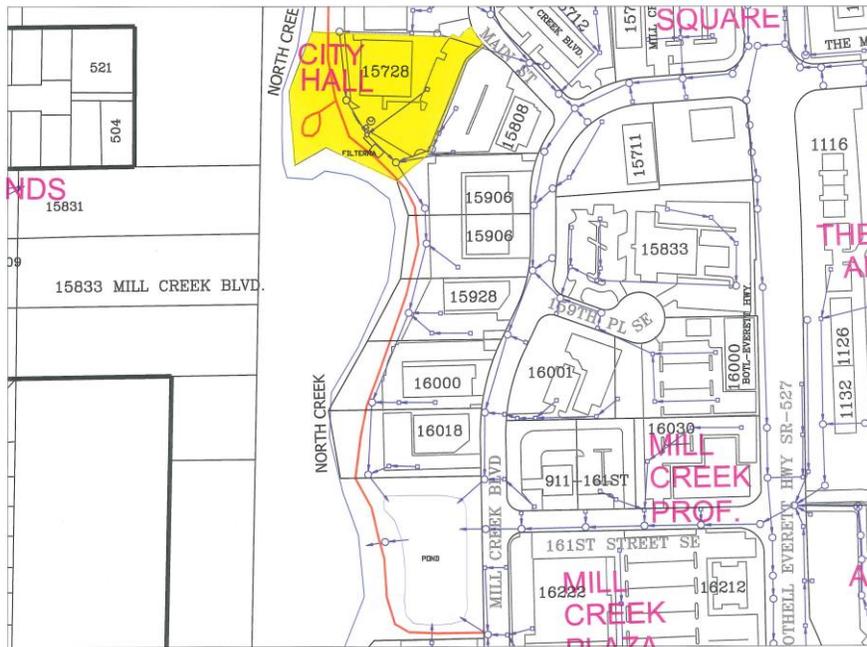
2.3.2 Recycling and Waste Disposal

The Facility Parks and Recreation Maintenance Department handles solid waste storage and disposal from maintenance operations, including landscaping and yard debris, street sweeping, as well as general trash from City Hall. There is one 2 cubic yard trash dumpster located at City Hall. There are two containers (15 cubic yard and 20 cubic yard) that are used for both yard waste and landscaping debris. These yard waste and landscape debris dumpsters are located at an off-site property on vacant land. Solid waste generated from the street sweepers is placed in a separate 15 cubic yard dumpster at the off-site location. Waste Management is contracted to collect the solid waste dumpsters at the off-site location.

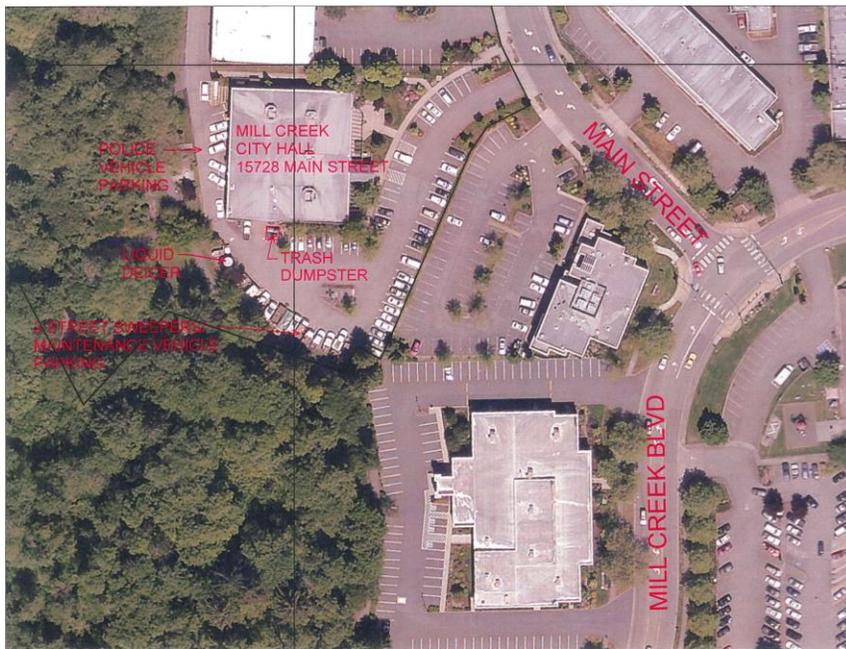
2.3.3 Liquid Material Storage

The majority of liquid stored at the Facility is stored inside the shop. Fluid types include small amounts of fuel (one, two, and five gallon containers), oil, antifreeze and cleaners. The fuel is stored in a vented storage locker. Spills are cleaned up immediately using a spill kit with absorbing diapers and kitty-litter like material. The one exception is the liquid deicer, which is stored in a 5,000 gallon single-wall container outside. The liquid deicer is located inside a secondary containment area. The deicer secondary containment area has a sump pump located in it to pump out the water that collects in the bottom so that if there was a spill there would be sufficient space for the spilled deicer liquid. The sump pump is started manually and the Facility Parks and Recreation Maintenance crew checks on it weekly.

**Figure 2-1:
Site Drainage Patterns**



**Figure 2-2:
Facility Site Map**



SECTION 3: BEST MANAGEMENT PRACTICES

This section describes Best Management Practices (BMPs) that are currently implemented and required for the site. Tables are provided which list BMPs, current and required, for activities which drain to the storm drainage system. This section also discusses the Pollution Prevention team, training requirements, and the treatment BMPs currently in place at the site.

3.1 CURRENT AND REQUIRED BMPs FOR FACILITY ACTIVITIES

Stormwater BMPs include structures, activities, or practices which will help prevent or reduce stormwater pollution. Operational Source Control BMPs are activities and practices that are implemented to prevent stormwater pollution. These practices include the following which are discussed in further detail below:

- Performing good housekeeping practices and preventative maintenance actions
- Developing a Pollution Prevention team
- Training staff annually
- Updating the Stormwater Pollution Prevention Plan

3.1.1 What are BMPs?

BMPs are the practices, procedures, policies, prohibitions, schedules of activities, structures, and devices that are implemented to prevent or minimize pollutants coming in contact with precipitation, storm water runoff, or non-storm water flows. BMPs are also structures or devices that remove pollutants from storm water runoff before the runoff enters a storm water drainage system or surface water. Therefore, BMPs are often categorized as either “source control” BMPs or “treatment control” BMPs. Source control BMPs include all types of measures designed to prevent pollution at the

source, that is, to keep storm water from contacting pollutants in the first place. Source control BMPs are generally simple, low-maintenance, cost-effective and are broadly applicable. They may be categorized as either nonstructural or structural. Good housekeeping is an example of a non-structural source control BMP; a canopy is an example of a structural source control BMP.

Treatment control BMPs are methods of treating storm water runoff to remove pollutants and are frequently more costly to design, install, and operate than source control BMPs. More importantly, treatment control BMPs are typically not as effective as source control BMPs, and the effectiveness is highly dependent on regular maintenance. Nevertheless, they can be appropriate and effective under certain conditions. However, treatment control BMPs typically do not remove all pollutants from storm water runoff and should not be regarded as disposal systems.

A list of suggested BMPs for the maintenance facility is shown in Table 3-1 on the following page.

**Table 3-1:
Current and Recommended BMPs for Maintenance Facility Activities**

Facility Activity	Location ^[a]	Current BMPs	Recommended BMPs
Storage of Vehicles and Equipment	P	Paved area is cleaned by street sweepers	<ul style="list-style-type: none"> Sweep parking areas as needed to collect dirt, waste, and debris. Do not hose down area to the storm drainage system. If washing/pressure washing of the parking occurs, place filters within the catch basins to prevent sediment and suspended solids from entering the MS4. Place straw wattle in front of curb inlet to Filterra unit to prevent dirt from clogging the media in the Filterra unit.
Vehicle Washing	Offsite	The City has an account with a commercial car wash facility and washes vehicles that fit in the facility.	<ul style="list-style-type: none"> Construct a decant facility where the soapy water will go directly into the sewer system.
Vehicle and Equipment Service and Maintenance	Offsite	The City services and maintains their vehicles at a offsite private service shop	<ul style="list-style-type: none"> Inspect for leaks from vehicles and equipment Use drip pans or containers under parts or vehicles that drip or that are likely to drip
Storage of Liquids in Permanent Above Ground Tanks	P	The City deicer tank is placed in a secondary containment area. (installed 11/ 2011)	<ul style="list-style-type: none"> Inspect tank area regularly to identify problem components such as fittings, pipe connections, and valves, for leaks/spills, cracks and corrosion Place adequately sized drip pans beneath all mounted taps and drip/spill locations during filling/unloading of tanks Sweep and clean the tank storage area regularly Replace or repair tanks that are leaking, corroding or otherwise deteriorated Locate tank in a secondary containment area for 110% of the storage volume of the tank
Spill of Oil and Hazardous Substances	P, S	The City maintains spill kits in the shop to deploy for spill cleanup. The City has an Emergency Spill Control Plan	<ul style="list-style-type: none"> Prepare an Emergency Spill Control Plan Have adequate supply of spill materials on site for emergency's
Storage of Liquid, Food, Waste, or Dangerous Waste Containers	P,S	Stores liquids in the shop area in ventilated cabinets	<ul style="list-style-type: none"> Inspect container storage areas regularly for corrosion, structural failure, spills, leaks, overfills Check containers daily for leaks, spills Place drip pans beneath all mounted container taps and at all potential drip and spill locations during filling and unloading Store garbage/waste in bins/containers with lids to prevent contact with rainfall.

[a] Location: P = Parking Lot; S = Shop

3.1.2 Good Housekeeping

Good housekeeping practices include activities that are intended to maintain a clean site and keep equipment in good working order to prevent storm water quality problems from occurring. It is better to keep pollutants out of stormwater rather than having to remove them later. Daily cleanup and inspections are the most effective means of achieving good housekeeping. For the most part, good housekeeping is a day-to-day activity that does not require a large expenditure of time or expense, and should be implemented on an ongoing basis. A variety of good housekeeping practices have been developed to reduce or eliminate run-on and runoff pollutants from general Facility activities. They are summarized in the following table:

**Table 3-2:
General Good Housekeeping Practices**

Activity	Frequency
Routine Sweeping of Paved Surfaces/outdoor work areas	As Needed
Periodic Cleanup of Debris and Old Equipment	Quarterly
Routine Inspection for Leaks or Spills	Daily
Waste and Material Minimization Programs, order only the amount of material needed for any particular job	On-Going
Prevention of Bulk Material Stockpiles from Eroding, such as using covers or berms, as applicable	After use
Preventing run-on and runoff	On-Going
Tools and materials should be returned to designated storage areas after use	Daily
Indoor work areas should be neat, uncluttered, and well-ventilated to discourage outdoor work and to allow leaks and spills to be quickly detected and controlled	On-Going
Occasionally outdoor work areas may need cleaning beyond sweeping. In such cases, all wash waters should be contained, collected, and properly disposed	As Needed
Outdoor waste or trash receptacles should be covered and emptied regularly and the adjacent areas inspected for misplaced or wind-blown litter	On-Going

Table 3-1 shows activities that drain to the storm system and their respective current and recommended BMPs. The specific activity BMPs listed in Table 3-1 have been adapted from Volume V of the 2005 Department of Ecology Stormwater Management Manual for Western Washington.

3.1.3 Treatment BMPs

A 12X6 foot Filterra unit was installed in 2011 as part of a stormwater retrofit project using a grant from The Washington State Department of Ecology. The Filterra unit will be inspected every six months and will be maintained by the City maintenance crew when needed.

3.1.4 Recommended Structural BMP Implementation Schedule

As noted above and in Appendix A, there are structural BMPs that are recommended for the oversized vehicle and equipment washing.

The recommended BMPs for vehicle washing is to construct a wash pad that drains to the sanitary sewer. Alderwood Water and Wastewater District is the City's sewer purveyor and requires that wash pads have permanent covers on them to reduce the amount of inflow into the sewer from rainfall. Due to the costs of constructing such improvements and the intent to relocate the maintenance facility the City does not intend on constructing a covered wash bay. It currently contracts with a local commercial wash facility to wash the fleet vehicles offsite. Oversized vehicles are taken to a commercial self serve car wash off-site. Sometimes we also spot clean the vehicles on site using a waterless car wash kit.

Spill Prevention and Response

For spills, the old saying "an ounce of prevention is worth a pound of cure" is appropriate. Spill clean-up can be labor-intensive and costly, involving expenses to contain the spill, collect the spilled substance, properly dispose of spill materials, and report filing to regulatory agencies, in addition to possible monetary fines. Spills and leaks are some of the most significant sources of water pollution and are, in most cases, avoidable.

Spill prevention and control procedures include the following:

- place bollards around the liquid storage containers to prevent vehicles and equipment from impacting the containers and causing accidental spills;

- place berms and containment features around structures or areas where fluids are stored so that releases can be prevented, easily detected, and controlled;
- use drip pans for maintenance operations involving fluids and under leaking vehicles and equipment waiting repair;
- place spill kits in areas where fluids are stored or in areas where activities may result in a spill;
- provide training for proper use of materials and equipment used during operations and maintenance activities;
- provide training for proper use of spill response equipment and supplies; and
- conduct outdoor maintenance activities on paved surfaces to allow for easy detection, control, and cleanup of spills.

Spill prevention, control, and cleanup applies to all materials and wastes—not only hazardous substances. The toxic water quality effects from spills of hazardous substances (e.g., acids, oils, greases, fuels, solvents, pesticides) are commonly understood. However, non-hazardous materials—for example, sand, litter, corn oil, sweeteners, soaps, and milk, among others—can also greatly impact water quality.

3.1.5 Pollution Prevention Team

The City has defined members of the Facility Pollution Prevention Team. The team consists of staff from the various departments responsible for performing the key SWPPP on-site activities. Table 3-3 below lists the team members, their contact information, and their responsibilities.

**Table 3-3:
 Pollution Prevention Team**

Position	Name & Contact Information	Responsibilities
Engineering Director	Scott Smith 425-921-5708	<ul style="list-style-type: none"> • Overall responsibility for coordination and permit compliance
Stormwater Specialist	Marci Chew 425-921-5709	<ul style="list-style-type: none"> • Performs SWPPP inspections, • Updates the SWPPP • Oversee cleaning of storm drainage system
Maintenance Supervisor	Nathan Beagle 425-921-5739	<ul style="list-style-type: none"> • Responsible for implementing the SWPPP throughout the facility and facility operations.

3.1.6 Training for Facility Personnel

The Phase II Municipal Stormwater Permit requires that training be provided to Facility employees whose activities could impact stormwater quality. The Stormwater Specialist is responsible for Storm Water Management training.

The Stormwater Specialist position coordinates training related to storm water management on at least an annual basis to review specific responsibilities for implementing this SWPPP, what and how to accomplish those responsibilities, including BMP implementation. This training will occur shortly after completion of the SWPPP and then will typically occur when new facility personnel are hired on.

Additionally, general awareness training is provided all employees whose activities may impact storm water discharges. The purpose of this training is to educate workers on activities that can impact storm water discharges, and to help in the implementation of BMPs.

Attach training attendance sheets and any other training documentation in Appendix C. Include instructor's name, date and time of training, location of training, and training participants.

The training records are kept for a period of no less than five years.

Monitoring (Visual inspections)

There are no permits or other conditions that prescribe or require stormwater sampling for the Maintenance Facility. The stormwater BMP monitoring for the Facility will rely upon quarterly wet and dry weather visual inspections of discharge quality to indicate obvious or potential problems, and an annual BMP evaluation. Coupled with the other BMPs for this Facility, as discussed in Section 3, this approach should be well suited to minimize the potential for adverse conditions on stormwater quality. The two primary purposes of the monitoring are to:

- assess illicit and non-stormwater discharges; and
- determine if BMPs need maintenance.

3.2 DRAINAGE CHARACTERISTICS

As discussed in Section 1, the site generally slopes to the south, with sheet flow from the parking lot entering a 12x6 Filterra unit before entering one of

three catch basins. As this system is not separated from upstream systems, inspections should note any pollution coming from the upstream tributary area.

3.3 QUARTERLY WET AND DRY WEATHER VISUAL INSPECTIONS

Inspections of the catch basins will be performed on a quarterly basis during wet and dry weather. As the drainage system is combined with adjacent buildings/parking lots, inspections should note any discharge from the upstream flows. This will also make it difficult to identify sources of pollutants found within the catch basins themselves. Inspection notes should address any pollutants located on and around the grates of the catch basins.

Wet weather inspections means that discharges from the identified outfalls will be assessed during a significant rainfall resulting in visible stormwater runoff and discharges from the site. This rainfall should be approximately 0.1 inches or more in a 24-hour period, but site conditions and local rainfall patterns should be taken into account so that inspections can begin soon after significant runoff begins. Note that inspections are not required to be conducted outside of regular business hours or during unsafe conditions.

Dry weather inspections should be conducted when no rain has occurred at the Facility for at least 24 hours prior to inspection.

Visual inspections consist of making observations of the visual characteristics of discharges from the outfalls and recording them on the appropriate forms. These observations include recording the absence or presence and degree of the indicators outlined below:

- **Floatables:** Floatables indicate if obvious trash or other controllable debris, such as landscaping material, leaf litter, etc., has entered into the storm system.
- **Foam:** Foam indicates that potentially soap or other cleaning products have entered into the storm system. However, stormwater can often be slightly foamy from pollen and other natural organic material. The way to tell the difference is by appearance and smell. If the foam is persistent and accompanied by a fragrant odor, it could be related to a cleaning product. If the suds break up quickly, then it could be from turbulence and/or natural conditions.

- **Sheen:** Sheen, which also looks like a rainbow hue on the water surface, is commonly indicative of petroleum products, often present from parking lot runoff. If gasoline or a flammable solvent is suspected, leave the immediate area, notify Facility management immediately, and take action to prevent fire or explosion.
- **Turbidity:** Turbidity, which makes the water appear cloudy, is usually an indication of dirt or sediment in the water.
- **Odor:** Certain contaminants in stormwater can give off specific odors, which should be described as best as possible. Odors can include those similar to rotten eggs, solvent, fuel/oil, cleaning agent, etc. When noting odors, be sure that the odor is related only to the runoff being inspected, not from an unrelated source nearby. If gasoline or a flammable solvent is suspected, leave the immediate area, notify the Facility management immediately, and take action to prevent fire or explosion.
- **Discoloration:** A red/orange color can indicate rust from iron pipes or iron bacteria. Other colors such as white could indicate paint or cleaning agent emulsions.
- **Flow:** Note presence or discharge from each outfall. If flow is present, indicate the approximate discharge rate on the inspection form (e.g., <10 gpm or >10 gpm).

3.4 ANNUAL BMP EVALUATION

The Annual BMP Evaluation Form, located in Appendix A, will be completed on an annual basis by a member of the pollution prevention team. The form is used to assess the current BMPs in place at the Facility. Outcomes from this evaluation will help to determine if any additional BMPs need to be put in place or if current BMPs should be modified.

3.5 SWPPP REVISIONS

The SWPPP shall be modified, specifically under the following conditions:

- significant changes occur at the Facility which affect current BMPs and could affect stormwater quality; and
- on an annual basis to reflect any administrative changes, including pollution prevention team members.

APPENDIX A:
INSPECTION AND REPORTING FORM



Quarterly Catch Basin Visual Inspection Report January

Date of Inspection: _____ Inspector: Marci Chew

Type of Weather: Wet Dry Last 24 hr rainfall: _____

Wet weather inspections: rainfall of approximately 0.1" or more in the 24 hour period prior to inspection

Dry weather inspections: no rain at facility being inspected for at least 24 hours prior to inspection

Please check if any of the following as it applies and describe accordingly:

<p style="text-align: center;">Catch Basin #4577</p> <input type="checkbox"/> Floatables _____ <input type="checkbox"/> Foam _____ <input type="checkbox"/> Sheen _____ <input type="checkbox"/> Turbidity _____ <input type="checkbox"/> Odor _____ <input type="checkbox"/> Discoloration _____ <input type="checkbox"/> Flow _____	<p style="text-align: center;">Catch Basin #4574</p> <input type="checkbox"/> Floatables _____ <input type="checkbox"/> Foam _____ <input type="checkbox"/> Sheen _____ <input type="checkbox"/> Turbidity _____ <input type="checkbox"/> Odor _____ <input type="checkbox"/> Discoloration _____ <input type="checkbox"/> Flow _____	<p style="text-align: center;">Catch Basin #4575</p> <input type="checkbox"/> Floatables _____ <input type="checkbox"/> Foam _____ <input type="checkbox"/> Sheen _____ <input type="checkbox"/> Turbidity _____ <input type="checkbox"/> Odor _____ <input type="checkbox"/> Discoloration _____ <input type="checkbox"/> Flow _____
<p style="text-align: center;">Catch Basin #4576</p> <input type="checkbox"/> Floatables _____ <input type="checkbox"/> Foam _____ <input type="checkbox"/> Sheen _____ <input type="checkbox"/> Turbidity _____ <input type="checkbox"/> Odor _____ <input type="checkbox"/> Discoloration _____ <input type="checkbox"/> Flow _____	<p style="text-align: center;">Catch Basin #4579</p> <input type="checkbox"/> Floatables _____ <input type="checkbox"/> Foam _____ <input type="checkbox"/> Sheen _____ <input type="checkbox"/> Turbidity _____ <input type="checkbox"/> Odor _____ <input type="checkbox"/> Discoloration _____ <input type="checkbox"/> Flow _____	<p style="text-align: center;">Filterra #4578</p> <input type="checkbox"/> Solids blocking curb inlet

Additional Notes: _____

<p>Action taken: _____ _____ _____</p>
<p>By: _____ Date: _____</p>

