



## Annual Report

Number	Permit Section	Question
1	S5.A	Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.  <b>Not Applicable</b>
2	S5.A	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)  <b>DRAFT 2020_MLT_SWMP_2_03272020123256</b>
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.  <b>Yes</b>
4	S5.A.5.b	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)  <b>Yes</b>
4a	S5.A.5.b	Attach a written description of internal coordination mechanisms. (S5.A.5.b).  <b>Item #4 S5.A.5.b. internal coo_4a_03272020123256</b>
15	S5.C.1.c	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.1.c.i. (Required annually)  <b>Yes</b>
16	S5.C.1.c	From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)  <b>No</b>
20	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)  <b>No</b>
21	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.  <b>Item #21 Description of genera_21_03272020123447</b>
22	S5.C.2	Conducted an evaluation of the effectiveness of the ongoing behavior change program and documented recommendations as outlined in S5.C.2.a.ii(b). (Required no later than July 1, 2020)  <b>Not Applicable</b>
26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.  <b>Yes</b>
26a	S5.C.2	Attach a list of stewardship opportunities provided.  <b>Item #26 S5.C.2.a.iii_stewards_26a_03272020123447</b>

Number	Permit Section	Question
27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a)  <b>Public hearings, work sessions, and council meetings are open to the public. Opportunities to comment on stormwater issues are publicized through public postings, on the city website, and the city's online newspaper. The public are invited to review and comment on the SWMP on the city website, Twitter, and Facebook. Residents have input and make decisions through the Ballinger Watershed Forum committees. Outreach to non-English speakers was done through lake signs in Spanish, Mandarin Chinese, and Korean.</b>
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)  <b>Yes</b>
28a	S5.C.3.	List the website address in Comments field.  <b><a href="https://www.cityofmlt.com/367/Stormwater-Reports-Plans">https://www.cityofmlt.com/367/Stormwater-Reports-Plans</a></b>
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii?  <b>Yes</b>
30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)  <b>Yes</b>
30a	S5.C.4.	Attach a spreadsheet that lists the known outfalls' size and material(s).  <b>Item #30a, SF.C.4_30a_03272020124131</b>  Comment: Additional investigations are ongoing to locate and document any outfalls without field-confirmed dimensions and material.
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)  <b>Yes</b>
32	S5.C.4.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.C.4.c? (Required no later than August 1, 2021)  <b>Yes</b>
33	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. Describe actions in Comments field. (S5.C.5.b)  <b>Yes</b>  Comment: Public employees: Quarterly training by program manager on spill prevention and clean up, PPE, and proper waste disposal BMPs. Businesses: Proper disposal of wastewater from carpet cleaning, pressure/power washing, auto detail or washing, steam cleaning, and pet care services. Staff researched mobile business home locations and delivered outreach on appropriate BMPs. General public: Proper pet waste disposal is encouraged with signs at parks around the city. Staff have produced educational materials on mobile cleaning BMPs, "10 Things You Can Do to Prevent Stormwater Pollution", and spill reporting hotline refrigerator magnets. All distributed at City Hall and events attended by the general public.
34	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.  <b>Yes</b>
35	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.  <b>Yes</b>
35a	S5.C.5	Cite field screening methodology in Comments field.  <b>Mountlake Terrace uses a combination field screening methodology, with catch basin/manhole inspection during regularly scheduled inspection work, and outfall inspections during the dry weather season. The city follows the guidance on how to screen outfalls, catch basins, and manholes as described in Herrera's Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera, May 2013.)</b>

Number	Permit Section	Question
36	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.) <b>20</b>
36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened. <b>Outfall screening by stormwater program manager during dry weather season combined with catch basin inspection during cleaning by O&amp;M crews.</b>
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.) <b>0</b>
38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii) <b>The spill hotline is advertised on the city's website (multiple pages), and also promoted on custom refrigerator magnets which are distributed to the public at the front counter at City Hall, during summer festivals, and at other events with the public.</b>
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii. <b>Yes</b>
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e. <b>Yes</b>
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f. <b>Yes</b>
42	S5.C.5	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.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12. <b>Item #42_S5.C.5.g_IDDE trackin_42_03272020124209</b>
43	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. <b>Yes</b>
44	S5.C.6.	Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022) <b>Yes</b>
44a	S5.C.6.	Cite code reference in Comments field. <b><a href="https://www.codepublishing.com/WA/MountlakeTerrace/#!/MountlakeTerrace16/MountlakeTerrace1620.html">https://www.codepublishing.com/WA/MountlakeTerrace/#!/MountlakeTerrace16/MountlakeTerrace1620.html</a></b>
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1) <b>0</b>
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1) <b>0</b>
47	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i) <b>Yes</b>

<b>Number</b>	<b>Permit Section</b>	<b>Question</b>
47a	S5.C.6.	Number of site plans reviewed during the reporting period. <b>24</b>
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential? <b>Yes</b>
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii. <b>Yes</b>
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii. <b>8</b>
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv? <b>Yes</b>
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v) <b>Yes</b>
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v) <b>Yes</b>
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv)(S5.C.7.c.viii) <b>0</b>
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi) <b>Yes</b>
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d) <b>Yes</b>
55	S5.C.6.	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e) <b>Yes</b>
56	S5.C.7.	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 per S5.C.7.a.? <b>Yes</b>
57	S5.C.7.	Updated maintenance standards specified in Stormwater Management Manual for Western Washington per S5.C.7.a? (Required no later than June 30, 2022) <b>Not Applicable</b>
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a) <b>No</b>

<b>Number</b>	<b>Permit Section</b>	<b>Question</b>
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard. <b>Yes</b>
59a	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control. <b>Not Applicable</b>
60	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))? <b>Yes</b>
61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b) <b>Yes</b>
61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b) <b>Not Applicable</b>
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii) <b>Yes</b>
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i) <b>Yes</b>
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i) <b>58</b>
63b	S5.C.7.	Number of facilities inspected during the reporting period. <b>57</b>
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period. <b>13</b>
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i. <b>Not Applicable</b>
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii. <b>Yes</b>
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S5.C.7.c.iii) <b>Yes</b>
66a	S5.C.7.	Number of known catch basins? <b>2286</b>
66b	S5.C.7.	Number of catch basins inspected during the reporting period? <b>1372</b>
66c	S5.C.7.	Number of catch basins cleaned during the reporting period? <b>380</b>

Number	Permit Section	Question
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii.(a)-(c)) <b>Not Applicable</b>
68	S5.C.7.	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. (S5.C.7.d) <b>Yes</b>
69	S5.C.7.	Documented 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. (S5.C.7.d – Required by December 31, 2022) <b>Yes</b>
69a	S5.C.7.	Cite documentation in Comments. <b>Mountlake Terrace Stormwater Standard Operating Procedures (2020.)</b>
70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e) <b>Yes</b>
71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f) <b>Yes</b>
72	S5.C.7.	Updated, if needed, SWPPPs according to S5.C.7.f no later than December 31, 2022. <b>Yes</b>
73	S5.C.8	Adopted ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities per S.5.C.8.b.i. (Required by August 1, 2022) <b>Not Applicable</b>
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.) <b>Not Applicable</b>
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023). <b>Not Applicable</b>
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023). <b>Not Applicable</b>
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv. <b>Not Applicable</b>
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken. <b>Not Applicable</b>
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v? <b>Not Applicable</b>
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A) <b>Yes</b>

Number	Permit Section	Question
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)  <b>Item #81 S7A Swamp Creek TMDL _81_03272020124400</b>
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)  <b>Yes</b>
83	S8	Notified Ecology by December 1, 2019 which option you selected: S8.A.2.a, or S8.A.2.b.  <b>Yes</b>
84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?  <b>Yes</b>
85	S8	Notified Ecology by December 1, 2019 which option you selected: S8.B.2.a, or S8.B.2.b?  <b>Yes</b>
86	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2020? (S8.C.1.b and Appendix 9)  <b>Not Applicable</b>
88	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)  <b>Yes</b>
89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.  <b>Yes</b>
90	Compliance with standards	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)  <b>Yes</b>
91	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.  <b>Not Applicable</b>
92	Compliance with standards	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)  <b>Not Applicable</b>
93	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)  <b>Not Applicable</b>
94	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.  <b>0</b>

**Attachments:**

### View Files Attached to Submission

	DocDescr	DocName	DocExt	DocID	SubID	AppName
<a href="#">View</a>	WAR045531_2_03272020123256	DRAFT 2020_MLT_SWMP_2_03272020123256	.pdf	922758	1708410	wqwebportal

<a href="#">View</a>	WAR045531_21_03272020123447	Item #21 Description of genera_21_03272020123447	.pdf	922760	1708410	wqwebportal
<a href="#">View</a>	WAR045531_26a_03272020123447	Item #26 S5.C.2.a.iii_stewards_26a_03272020123447	.pdf	922761	1708410	wqwebportal
<a href="#">View</a>	WAR045531_30a_03272020124131	Item #30a, SF.C.4_30a_03272020124131	.pdf	922766	1708410	wqwebportal
<a href="#">View</a>	WAR045531_4a_03272020123256	Item #4 S5.A.5.b. internal coo_4a_03272020123256	.pdf	922759	1708410	wqwebportal
<a href="#">View</a>	WAR045531_42_03272020124209	Item #42_S5.C.5.g_IDDE trackin_42_03272020124209	.pdf	922767	1708410	wqwebportal
<a href="#">View</a>	WAR045531_81_03272020124400	Item #81 S7A Swamp Creek TMDL_81_03272020124400	.pdf	922768	1708410	wqwebportal

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**Item #4 S5.A.5.b Attach a written description of internal coordination mechanisms**

The Stormwater Program Manager is responsible for internal coordination at the city, though several different job categories in the city are involved with stormwater protection. This is accomplished through the following actions:

- **Meetings** organized by the stormwater program manager to provide training, discuss, and document specific stormwater compliance activities such as spill response, stormwater facility inspections, and LID implementation (among other topics.)
- **Training** regarding stormwater permit requirements, with a particular focus on spill response, delivered via quarterly meetings with the O&M crews.
- **Discussion** with managers in Public Works, Engineering, Planning, Building Inspection, Parks, and other city departments who in turn communicate important stormwater issues to the city Manager. Near daily coordination with the stormwater/street utility supervisor regarding stormwater issues.
- **Sharing** of citywide stormwater issues with other departments, including the Community and Economic Development (land use planning) team, Parks department, Operations and Maintenance, Fire, and the Engineering team.

Plan reviewers determine whether permit requirements regarding development are being followed, construction inspectors are charged with overseeing erosion control on construction sites, maintenance supervisors are in charge of inspection of the city's MS4s and ensuring maintenance records are kept up-to-date. Coordination with the city's Community Relations Specialist is important to implement part of the public outreach portion of the permit through community events, social media, notices, and the city newsletter "City Happenings." The Parks and Recreation Department is responsible for organizing and managing volunteer stewardship activities to support stormwater protection goals. The Stormwater Program Manager is responsible for working with all of these departments to ensure that the requirements of the citywide stormwater permit are met and documented.

**Item #21: Description of general awareness efforts conducted per S5.C.2.a.i.**

The City of Mountlake Terrace (MLT) stormwater general awareness effort is set up to connect with people and organizations with the potential to affect surface water quality within the city limits. Attendance at activities and programs is tracked, and the city periodically requests feedback from the community as to what programs and services are most beneficial during the annual survey of the community. Other avenues to measure impact of general awareness levels are: activity levels on the stormwater web page, individual feedback during phone calls and personal interactions at events, and comments regarding stormwater issues submitted through Facebook and Twitter.

The table below summarizes public education and outreach activities conducted in 2019.

Program	Target Audience	Goal and/or Behaviors Promoted
Low Impact Development (LID) outreach and plan review	Engineers, contractors, developers, homeowners	Increases implementation of Low Impact Development (LID) through easy-to-use guidelines and checklists which are readily available on the city website and at the planning counter. Explanation of LID guidelines are part of the pre-application process for potential development within city limits. Plan review at the pre-application, land use, and civil review stages also helps explain and enforce LID consistently for new development and redevelopment. As part of the city’s efforts to assist overburdened communities, interpretation services will be available at the planning permit counter in 2020.
Rain garden workshop	General public, homeowners	Sponsored and funded Snohomish Conservation District workshop on rain garden construction and maintenance. 67 attendees in May 2019.
Stewardship outreach	General public	Stewardship opportunities are publicized through the City Happenings newsletter, City Council meetings, news releases, Facebook, Twitter, and on the city website.
Storm drain marking	Schoolchildren	Partnered with Boy Scout Troop #60 in September 2019 to place 364 “No Dumping – Mountlake Terrace” storm drain markers around the city.
Mobile cleaning BMPs	Mobile businesses	Staff researched mobile business home locations and delivered outreach on appropriate BMPs, to encourage the proper disposal of wastewater from carpet cleaning, pressure/power washing, auto detail or washing, steam cleaning, and pet care services.
Mountlake Terrace-specific pollution prevention outreach materials	General public	Proper pet waste disposal is encouraged with signs at parks around the city. Staff have produced educational materials on mobile cleaning BMPs, “10 Things You Can Do to Prevent Stormwater Pollution”, and spill reporting hotline refrigerator magnets. All are distributed at City Hall and events attended by the general public.
Earth Day/Arbor Day outreach	General public	Stewardship of riparian areas, and promoted tree planting with a tree giveaway.
Summer festival outreach	General public	Staff outreach on everyday actions people can take to protect stormwater, with posters, educational flyers, and one-on-one discussions at the MLT booth for Third of July, Tour D’Terrace, and National Night Out.

Program	Target Audience	Goal and/or Behaviors Promoted
Sustainability Garden Award	General public, homeowners	Residential adoption of water quality and infiltration LID BMPs as demonstration gardens for the community through a new public recognition award, the “Sustainability Award”. The Sustainability Award has been added as a new category for the existing Evergreen Award Program.
City newsletter, press releases, coverage by MLT News	General public	Provides opportunities to become involved in stewardship activities, how to prevent illicit discharges, and proper disposal of hazardous liquids, such as paint. Discourages car washing in areas that drain to surface water, including Lake Ballinger. Alerts citizens that they have the opportunity to provide input and feedback on the stormwater rate study, and that stormwater rates were increasing.
City web pages	General public, contractors, developers, planners, and businesses	Provides a current and quickly updateable way to share public education and outreach on a range of stormwater issues. This year, there was a special focus on utilities (Utilities 101) on the city website, including the value provided by the stormwater utility.

In addition to maintaining the existing programs and activities described, the City:

- Actively participates in STORM (Stormwater Outreach for Regional Municipalities.)
- Is a contributing member of the North Sound and Eastside Permittee Coordination Groups
- Continues to provide stewardship opportunities and partner with other Parks and organizations to encourage residents to participate in activities which meet permit requirements

**Item #26 S.5.C.2.a.iii. List of stewardship opportunities provided.**

Stormwater-related stewardship opportunities in Mountlake Terrace in 2019 consisted of approximately 755 volunteer hours contributed through various beneficial activities and groups. Events included an Earth Day/Arbor Day event and the National Day of Service. Groups and projects included the Ballinger Organic Garden Club (BOG) who did educational and labor activities, the MLTDOG who maintained the Mountlake Terrace Dog Park, Eagle Candidate Michael Frary and troop 60 installed 364 “no dumping” medallions on storm basins, Girl Scout Troop 44253 removed invasive aquatic plants from Lake Ballinger, Vetoga (a business) removed ivy from trees, and Brighton School students and Whale Scouts who removed invasive plant material along Hall Creek.

## MLT Outfall material and size (Question 30a, SF.C.4)

Outfall #	Location	Diameter	Material
<b>H</b>	<b>Hall Creek</b>		
H1:	Ballinger Lakes	12"	Concrete
H2	230 <sup>th</sup> Outfall to Hall Creek	12"	Concrete
H3	Playground Drainage	12"	PVC
H4	Lakeview ROW	18"	Concrete
H5	229 <sup>th</sup> Pl. SW cul-de-sac		
H6	Playground Drainage	8"	PVC
H7	229th Pl. SW	36"	Concrete
H8	228th St. SW	12"	Concrete
H9	Andorra Estates	12"	Concrete
H10	Bosa Bros - Lake Village Estates	??	CMP
H11	226 <sup>th</sup> St. flow from W	12"	Concrete
H12	226 <sup>th</sup> St. flow from E	12"	Concrete
H13	Northgate Church	12"	Concrete
H14	Park Terrace Commons Condo	36"	CMP
H15	224 <sup>th</sup> St. SW from Edmonds	18"	CMP
H16	WISA Ice Rink/City Detention Pond	18"	PVC
H17	Nelson Business Park /ROW	12"	Concrete
H18	220th St. SW	18"	Concrete
H19	Bike Tunnel Sump	4"	PVC
H20	220 <sup>th</sup> St. N. Side	12"	PVC
H21	Premera Campus	36"	Concrete
H22	Highway 99 ROW	36"	Concrete
H23	216 <sup>th</sup> St. ROW	12"	Concrete
H24	216 <sup>th</sup> St. ROW	12"	Concrete
H25	216 <sup>th</sup> St. ROW	12"	Concrete
H26	216 <sup>th</sup> St. ROW	12"	PVC
H27	Premera Parking Lot	12"	Concrete
H28	Premera Parking Lot	12"	Concrete
H29	66 <sup>th</sup> Ave ROW	12"	Concrete
H30	66 <sup>th</sup> Ave ROW	12"	Concrete
H31	Taylor Pond	Weir	Aluminum
H32	Allied Waste	24"	CMP
H33	PUD r/w drainage	12"	PVC
H34	213 <sup>th</sup> St. ROW	12"	Concrete
H35	Sno co trans site/recycle	12"	Ductile Iron
H36	61 <sup>st</sup> Ave ROW	12"	Concrete
H37	Sno co trans site/main yard	15"	PVC
H38	60 <sup>th</sup> Ave. ROW	12"	Ductile Iron
H39	212 <sup>th</sup> St. ROW	12"	Concrete

## MLT Outfall material and size (Question 30a, SF.C.4)

<b>L Lyon</b>			
L1	244th ROW	12"	CMP
L2	44th Ave ROW	12"	CMP
<b>LM Lyon Middle</b>			
LM1	Markland Woods Condo		Native ground
LM2	Markland Woods Condo		Native ground
LM3	Markland Woods Condo		Native ground
LM4	Cedar Terrace Apts./44th Ave. ROW	36"	PVC
LM5	Cedar Terrace Apts.	16"	CMP
LM6	Cedar Terrace Apts.	12"	Concrete
<b>LE Lyon East</b>			
LE1	Creekside Village Apts.	12"	CMP
LE2	Creekside Village Apts.	12"	CMP
LE3	Creekside Village Apts.	12"	CMP
LE4	Creekside Village Apts.	12"	CMP
LE5	Creekside Village Apts.	12"	CMP
LE6	Creekside Village Apts.	12"	CMP
LE7	Creekside Village Apts.	12"	CMP
LE8	Creekside Village Apts.	12"	CMP
LE9	Creekside Village Apts.	12"	CMP
LE10	Creekside Village Apts.	12"	CMP
LE11	Markland Woods Condo		Native ground
LE12	Markland Woods Condo		Native ground
LE13	Markland Woods Condo		Native ground
LE14	Markland Woods Condo		Native ground
LE15	Markland Woods Condo		Native ground
LE16	231st St. ROW	12"	Concrete
LE18	228th St. ROW	12"	Concrete
LE19	225th St. ROW & Residences	24"	Concrete
<b>LW Lyon West</b>			
LW1	44th Ave ROW	8"	PVC
LW2	44th Ave ROW	12"	PVC
LW3	237th St. ROW	8"	Concrete
LW4	236th St. ROW	8"	Concrete
LW4A	45th Ct.	6"	PVC
LW4B	45th Ct.	12"	PVC
LW5	236th St. ROW	12"	Concrete
LW6	44th Place		
LW7	236th St. ROW	12"	Concrete
LW8	236th St. ROW	12"	Concrete
LW9	Lyon Creek Townhomes	12"	CMP
LW10	233rd St. ROW	12"	Concrete
LW11	47th Ave. ROW	12"	Concrete
LW12	48th Ave. ROW	12"	PVC
LW13	47th Pl. ROW	12"	PVC
LW14	228th St. ROW	12"	Concrete
LW15	228th St. ROW		Native ground

MLT Outfall material and size (Question 30a, SF.C.4)

LW16	52nd ROW/ Recreation Pavilion/Trans	24"	Ductile Iron
LW17	225th Pl. ROW	8"	Concrete
LW18	226th St. Residences	12"	PVC
LW19	224th St. ROW	12"	Concrete
LW20	223rd St. ROW	12"	Ductile Iron
LW21	222nd St. ROW	12"	PVC
LW22	48th Ave. ROW	18"	Concrete
LW23	49th Pl. ROW	12"	Concrete
<b>LB</b>	<b>Lake Ballinger</b>		
LB1	Swimming Beach 1	18"	CMP
LB2	Swimming Beach 2	12"	CMP
LB3	Surface flow from SR104		Native Ground
<b>S</b>	<b>Scriber</b>		
S1	Albertson's	18"	PVC
S2	Wildermere Pond	12"	CMP
S3	High School	??	PVC

Jurisdiction Name & Permit Number	Date incident discovered or reported to you	Date of beginning your response	Date of end of your response	How was the incident discovered or reported to you?	Discharge to MS4?	Incident location	Pollutants Identified	Source or Cause	Source tracing approach(es) used	Correction/elimination methods used	Field notes, explanations, and other comments:
Mountlake Terrace; WAR045531	1/7/2019	1/7/2019	1/7/2019	Staff referral	Yes - notified Ecology	234th St. SW & 55th Ave W., Mountlake Terrace	Sediment/soil	Construction activity	Observation	Education/technical assistance	ERTS number 686474. Backhoe operator accidentally pulled out 3/4 inch water main connector, causing approximately 40,000 gallons of drinking water combined with sediment from around the pipe to flow down the street to 2 catch basins on opposite sides of the street downstream. Affected CBs vactored out and contractor required to sweep street.
Mountlake Terrace; WAR045531	1/17/2019	1/17/2019	1/18/2019	Staff referral	Yes - notified Ecology	244th St. SW & Cedar Way, Mountlake Terrace	Sediment/Soil	Other accident/spill	Observation	Clean-up	ERTS #686727. An 8 inch water line developed a leak that created a sediment slurry under the road that eventually spilled approximately 100 cubic yards of sediment into Lyon Creek in Lake Forest Park. While the pipe and the road were being repaired January 17th and 18th, the MLT crews cleaned the 3 or 4 affected catch basins along 37th St. NE. They also swept the street of sediment, and installed catch basin inserts during the repair work on NE, and replaced the broken section of cast iron water line with ductile iron water line. The contractor (BnB) restored grade and compacted fill material along the road prism adjoining Lyon Creek, then added jute mats, erosion control seed, and straw wattles to areas off the road that were eroded by the water line break.
Mountlake Terrace; WAR045531	2/19/2019	2/19/2019	2/19/2019	Pollution hotline	Yes - notified Ecology	7116 220th St. SW, Mountlake Terrace	Fuel and/or vehicle related fluids	Other accident/spill	Observation	Clean-up	ERTS #687374. Approximately 1-2 gallons of diesel fuel spilled in the back parking lot of the Nelson Building. Material was cleaned up using spagsorb, absorbent mats, and sweeping the parking lot. Diesel that entered the creek was cleaned up with oil-sorbent booms and pads.
Mountlake Terrace; WAR045531	3/30/2019	4/1/2019	4/1/2019	Direct report to your staff	Yes - notified Ecology	4608 223rd St SW, Mountlake Terrace	Sediment/Soil	Construction	Observation	Education/technical assistance	ERTS #688184. Construction site managers attempted to do sawcutting of road without proper BMPs to handle runoff from sawcutting operations. No catch basin inserts, and inadequate vacuum (ShopVac.) A neighbor took pictures and called the city in to inspect. City staff visited and asked them to have a professional with professional vacuum equipment to deal with the runoff from the sawcutting, and to add catch basin inserts. These actions were done. Little sediment on the road, no sediment in the downstream catch basin.
Mountlake Terrace; WAR045531	4/1/2019	4/1/2019	4/1/2019	Direct report to your staff	Yes - notified Ecology	233rd PL SW & 66th Ave W, Mountlake Terrace	Other: drinking water	Other accident/spill	Observation	Clean-up	ERTS #688197. A small water line break caused chlorinated drinking water to appear at ground level and drain to a nearby catch basin. MLT Ops crews fixed the water line break within 1 hour of being alerted to it.
Mountlake Terrace; WAR045531	5/13/2019	5/13/2019	5/13/2019	Pollution hotline	Yes - notified Ecology	23308 54th Ave W., Mountlake Terrace	Soap or cleaning chemicals	Other: Car washing	Observation	Education/Technical Assistance	ERTS #689170. An email from a neighbor walking in the area came in with photos of soap from a car being washed going down the street. Asked home owner not to wash car in the street.
Mountlake Terrace; WAR045531	8/30/2019	8/30/2019	9/3/2019	Other agency referral	Unknown	Unknown	Sewage/septage/pet waste/human waste	Intentional dumping	Analytical laboratory indicators	Other: Investigation	Investigated potential sources of fecal coliform input around the subbasin upstream of the sample points, but were unable to determine source of pollutant.
Mountlake Terrace; WAR045531	9/9/2019	9/9/2019	9/9/2019	ERTS referral	No - none found	7011 226th Pl SW, Mountlake Terrace	Unconfirmed, unspecified, or not identified	Construction	Observation	Other: Investigation	Received ERTS# 692886 9/9/19 at 10AM from Ecology, called in by Jessie Coke 9/5/2019 at 16:49. Field visit scheduled for 11AM 9/9/2019. Creekside Meadows has received all permits for construction and the stormwater drainage plan has been deemed adequate.



Jurisdiction Name & Permit Number	Date incident discovered or reported to you	Date of beginning your response	Date of end of your response	How was the incident discovered or reported to you?	Discharge to MS4?	Incident location	Pollutants Identified	Source or Cause	Source tracing approach(es) used	Correction/elimination methods used	Field notes, explanations, and other comments:
Mountlake Terrace; WAR045531	9/11/2019	9/11/2019	9/11/2019	Direct report to your staff	No - cleaned up before reached MS4	24111 48th Ave W., Mountlake Terrace	Fuel and/or vehicle related fluids	Other accident/spill	Observation	Clean-up	Call came in from Sno-Com Fire regarding a small diesel spill (2ft x 2ft) on the street. Field crew responded and sprayed solubizing agent, then mopped it up with spagsorb.
Mountlake Terrace; WAR045531	11/4/2019	11/4/2019	11/5/2019	Direct report to your staff	No - cleaned up before reached MS4	4901 236TH ST SW, Mountlake Terrace	Soap or cleaning chemicals	Intentional dumping	Observation	Clean-up; Education/technical assistance	On Friday night at about 6PM, resident called in to non-emergency police number that approximately 5 gallons of bleach and water mixture was being dumped to street where it flowed into a catch basin. No rain that weekend, mixture did not leave catch basin. On 11/4, incident was investigated and the affected catch basin vactored out. Letter sent 11/5/2019 to property owner informing them that dumping bleach or soap to storm drain system was a water quality violation.
Mountlake Terrace; WAR045531	11/6/2019	11/6/2019	11/11/2019	Direct report to your staff	Yes - notified Ecology	22303 64th Ave SW, Mountlake Terrace	Other wastewater	Construction activity	Observation	Clean-up; Add or modify operational source control BMP	ERTS #694240. Concrete contractor (Pioneer Masonry & Concrete) allowed concrete from aggregate driveway to wash down the street and into the catchbasin on the corner of 223rd Pl and 64th Ave W. Catch basins pumped out, street cleaned. Cost recovery from contractor for city costs for clean-up.
Mountlake Terrace; WAR045531	12/11/2019	12/11/2019	12/11/2019	Direct report to your staff	Yes - notified Ecology	7010 226th Pl. SW, Mountlake Terrace	Sediment/soil	Construction activity	Observation	Clean-up; Add or modify operational source control BMP	The sweeper truck for a construction site across the street from 7010 226th Pl. SW did not notice that his tank was too full and was spilling some previously collected water mixed with construction runoff back on to the street. A small amount of sediment-laden water was spilled, but was mostly captured by the catch basin inserts in the street. When the sweeper operator noticed the problem, he went to empty his tank at a decant facility, and came back to clean up the remaining sediment off the street. The construction manager changed out the catch basin inserts, and put up signs asking for no parking until the curblin could be cleaned more thoroughly (now blocked by cars.)
Mountlake Terrace; WAR045531	12/4/2019	12/13/2019	12/13/2019	Direct report to your staff	No - none found	5700 240th St SW, Mountlake Terrace	Solid waste/trash	Intentional dumping	Observation	Education/technical assistance	Left highlighted code citation, sticky note asking for cleanup, and business card. Property owner called and left message claiming it was the city's responsibility to clean up leaves in the street, and noting that he did not appreciate my note and planned to add it to his leaf pile in the street. Complaint came in to city clerk from a social media post, and was routed to MLT code enforcement, who declined to pick it up after a delay several days, hence the delay in response.

Jurisdiction Name & Permit Number	Date incident discovered or reported to you	Date of beginning your response	Date of end of your response	How was the incident discovered or reported to you?	Discharge to MS4?	Incident location	Pollutants Identified	Source or Cause	Source tracing approach(es) used	Correction/elimination methods used	Field notes, explanations, and other comments:
Mountlake Terrace; WAR045531	12/16/2019	12/16/2019	12/16/2019	ERTS referral	Yes - notified Ecology	6001 236th St SW, Mountlake Terrace	Sediment/soil	Construction activity	Observation; Field indicator measurements	Add or modify structural source control BMP	ERTS #694919 Permit # 306720 Project: Sound Transit L300 On 12/11/19 at approximately 11:40 AM construction impacted stormwater estimated to be above 250 NTU was observed flowing into a catch basin at the southwest corner of the Mountlake Terrace Transit Center parking lot where construction activities are occurring. The catch basin drains to a WSDOT detention pond south of 236th Street SW which leads to a small tributary to McAleer Creek called SMT-1. When the discharge was observed, a crew immediately grabbed plastic to seal the catch basin and stopped the discharge. The discharge was stopped by 11:45 AM. No sample was taken due to the quick response of the crew members to stop the discharge; water was estimated to be above 250 NTU. At approximately 12:30 AM a pump was placed in the catch basin to collect the water and direct it to baker tanks located onsite. The rate of discharge prior to the fix was approximately 10 gpm.
Mountlake Terrace; WAR045531	12/21/2019	12/27/2019	1/13/2020	ERTS referral	Yes - notified Ecology	1-5/212th ST SW (west side), Mountlake Terrace	Sediment/soil	Construction activity	Observation; Field indicator measurements	Add or modify structural source control BMP	ERTs #695194. Pump failure caused large amount of sediment-laden water to enter street and discharge to catch basins 1,700 feet upstream of outfall to Hall Creek. S4F.1. letter submitted.

**Item #81: Summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s) (S7.A)**

<b>Name of TMDL</b>	<b>Swamp Creek</b>
<b>EPA Approved Document(s) for TMDL</b>	<i>Swamp Creek Fecal Coliform Bacteria Total Maximum Daily Load: Water Quality Improvement Report and Implementation Plan</i> , June 2006, Ecology Publication No. 06-10-021. <a href="http://www.ecy.wa.gov/biblio/0610021.html">http://www.ecy.wa.gov/biblio/0610021.html</a>
<b>Location of Original 303(d) Listings</b>	WA-08-1060
<b>Area Where TMDL Requirements Apply</b>	Requirements apply in all areas regulated under the Permittees municipal stormwater permit and draining to the portion of the WASWIS segment SM74QQ starting at the confluence with the Sammamish River and including all upstream tributaries contributing to the Swamp Creek segment of WASWIS GJ57UL.
<b>Parameter</b>	Fecal Coliform
<b>EPA Approval Date</b>	August 16, 2006
<b>MS4 Permittee</b>	Phase I Permit: Snohomish County Phase II Permit: Everett, Bothell, Lynnwood, Brier, Mountlake Terrace, Kenmore

The City of Mountlake Terrace has identified the entire area tributary to Swamp Creek within city limits. This area, which drains to Scriber Creek, tributary to Swamp Creek is the “high priority area” for activities addressing the fecal coliform TMDL described in the table above. Of the estimated 15,300 acres in the Swamp Creek watershed, approximately 196 acres (1.3 % of the land area) is in Mountlake Terrace.

*Actions Required*

**Business Inspections**

Requirement: Each Permittee shall inspect commercial animal handling areas and commercial composting facilities to ensure implementation of source control BMPs for bacteria.

There is one commercial animal handling area (a veterinary clinic) and no commercial composting facilities in the high priority area. The veterinary clinic was inspected in 2018 for proper BMPs regarding animal waste. The inspection indicated that all cleaning (including floor mats) occurs within the building; that dumpster lids are kept closed, and that all animal waste is double-bagged and disposed of as solid waste.

**Public Education and Outreach**

Requirement: Each Permittee shall conduct public education and outreach activities to increase awareness of bacterial pollution problems and promote proper pet waste management activities.

The results of a prior pet waste web survey in 2018 was used by the city to shape an approach to public education and outreach around awareness of bacterial water pollution and best practices for disposal of pet waste. In order to meet this requirement, the city published articles about the risks associated with improper pet waste disposal in their citywide newsletter (City Happenings), developed content for the city

website on the value of good pet waste disposal practices, produced signs encouraging proper pet waste management and put them up in the high priority area as well as around the city in areas identified by the animal control specialist as being popular with dog owners, and developed a pet-waste themed giveaway for summer festivals (a pet waste bag dispenser with the words “Keep MLT Tidy.”)

### **Operations & Maintenance**

Requirement: Each Permittee shall install and maintain animal waste collection and/or education stations at municipal parks and other Permittee owned and operated lands reasonably expected to have substantial domestic animal (dog and horse) use and the potential for pollution of stormwater.

There are no City of Mountlake Terrace owned and operated lands that are reasonably expected to have dog or horse use in the high priority area. The city does provide pet waste disposal bags at the city’s dog park (in the Lyons Creek watershed.)

### **IDDE**

Requirement: Permittees conducting IDDE-related field screening under S5.C.8 of the Phase I permit or S5.C.3 of the Western Washington Phase II permit shall screen for bacteria sources in any screened MS4 sub basins which discharge to surface waters in the TMDL area.

As part of routine IDDE outfall screening for illicit discharges and illegal connections, flow immediately upstream of a primary outfall to Scriber Creek (tributary to Swamp Creek) was sampled for common IDDE indicators on December 12, 2017. Temperature, pH, conductivity, and ammonia levels were all within acceptable levels, and the fecal coliform level was 12 CFU/100 ml. (estimated.)

### **Targeted Source Identification & Elimination**

Requirement: Permittees shall implement source identification and elimination efforts (including water quality sampling) in the MS4 sub basins discharging to the high priority area no later than August 1, 2014.

The City of Brier has been monitoring collecting water quality samples from the locations designated as part of the joint Mountlake Terrace-Brier Ecology QAPP, approved in 2015. The results of the sampling (conducted by Brier) are in the attached table.

There were some very high fecal coliform results discovered during routine testing August 21, 2019 (ranging from 350 to 14,000 CFU/100 ml.) When the sample results were sent from the lab on August 30, 2019, staff from the cities of Brier and Mountlake Terrace mobilized to complete field investigations of potential sources of sewage waste dumping. The following actions were undertaken:

- Called the testing laboratory to confirm the count numbers and make sure that the highest results were valid.
- Reached out to the Mountlake Terrace sewage lift station field staff to determine if there had been any wastewater releases. No problems were noted.
- Reached out to Lynnwood stormwater and wastewater staff to determine if any illicit dumping or lift station problems had occurred. City of Lynnwood investigated for illegal dumping.
- Visits to the sample sites by Brier staff to look for evidence of sewage, toilet paper, etc. None were found, though some of the sites “looked a bit murky.”
- Map source tracing to determine potential locations where dumping could have occurred.
- Inspection of catch basins tributary to the sample sites for evidence of illicit dumping or other pollutants. Field investigations did not reveal any evidence (visual or olfactory) of illicit discharges into catch basins connected to Scriber Creek.

- Collection of additional fecal coliform samples on September 3, 2019 by Brier staff. These sample results (included in the attached table) were much lower than the ones from the August 21, 2019 sample collection.

Unfortunately, despite these efforts, no point source for the high fecal coliform results was identified. One theory is that a motorhome returning from a summer vacation may have dumped their wastewater tank into a storm drain somewhere in the system. However, no field evidence was found to support this theory. City staff will be on high alert for similar problems during summer months in 2020, and will respond with more source tracing and related efforts.

### **Surface Water Monitoring**

Requirement: Each Permittee shall submit a draft revised QAPP to Ecology no later than February 2, 2015.

The 2015 QAPP was followed during 2019, and the City of Brier collected all required samples. The data collected is summarized in the table on the next page.

**2018 Swamp Creek TMDL Testing on Scriber Creek**

Am Test Inc. Laboratories 13600 NE 126th Pl., Suite C, Kirkland, WA 98034 (425) 885-1664; www.amtestlab.com

**Sites:**

Outfall source #1 - Fecal	Upstream of the junction with Swamp Creek
Outfall source #2 - Fecal	Replicate for Site 1
Outfall source #3 - Fecal	Downstream side of culvert at Scriber Creek crossing of Poplar Way
Outfall source #4 - Fecal	Upstream side of Scriber Creek crossing of Larch Way (212th)

SS = Steven Smith, City of Brier Public Works Supervisor

Fecal levels in colonies per 100 ml sample (CFU / 100 ml)

Date	1/17/2019	2/20/2019	3/21/2019	4/17/2019	5/15/2019	6/19/2019	7/17/2019	8/21/2019	9/3/2019	9/18/2019	10/15/2019	11/26/2019	12/18/2019
<b>Collected by</b>	SS	SS	SS	SS	SS	SS	SS	SS	SS	SS	SS	SS	SS
Outfall source #1	4	4	< 2	12	4	350	220	14000	9	62	22	13	4
Outfall source #2	16	28	4	18	92	210	640	3200	210	110	44	98	8
Outfall source #3	10	6	2	8	36	100	900	8000	54	420	9	190	6
Outfall source #4	6	40	< 2	12	62	2	600	350	4	92	7	50	4
<b>Arithmetic Average</b>													
<b>Controls</b>													
Control sample #1	10	48	6	30	190	66	160	1300	76	82	54	120	4
Control sample #2	36	140	28	74	60	120	220	1000	130	190	48	84	4
<b>Blanks</b>													
Blank #1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
Blank #2		< 1			< 1	< 1				< 1	< 1		< 1
Blank #3		< 1											< 1
Blank #4													< 1