Snohomish County Surface Water Management

Pollution Source Control Program:
Business Inspections

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Laura Frolich
Sean Hare
Today’s Topics

• Program Requirements
• Program History
• Tools Needed
• Inspection Process
• TMDL Inspections
• Partnerships
• Lessons Learned
• Program Future
What is Source Control?

Implementation of BMPs to reduce or eliminate pollutants from contaminating storm, ground and surface water.

• operational (e.g., spill prevention and cleanup)
• structural (e.g., secondary containment)
• treatment
Program Goals

• Reduce pollutants in runoff from areas that discharge to the Municipal Separate Storm Sewer System (MS4)
• Educate business owners on pollution prevention practices
• Ensure implementation of source control best management practices (BMPs) at commercial and industrial properties
• Enforce Snohomish County Water Pollution Control Code at inventory sites
Breakdown of Program Requirements

• Develop a code or ordinance requiring source control BMPs
• Create and update inventory-lists businesses and properties
• Implement an inspection program- 20% of inventory annually and all legitimate complaints
• Implement a progressive enforcement policy
• Train staff who will implement the program
Local Codes

Water Pollution Control Code (Ch. 7.53 SCC)

• Prohibited discharges and connections (7.53.070 & 7.53.080)
• Allowed and conditionally allowed discharges (7.53.090 & 7.53.095)
• BMPs required (7.53.120) – Drainage Manual, Vol. IV
• Inspections (7.53.130)
• Enforcement (7.53.170)
Source Control Inventory

All businesses with the potential to pollute;
1. Commercial/Industrial Parcel Use Codes – Appendix 8 for guidance
2. NPDES Permitted Facilities (PARIS database)
3. Commercial Animal Handling – Appendix 2, TMDL
4. Multi-Family Units – Initiated by Complaint
5. Mobile Businesses/Landscaping – Provide Outreach Material
6. Home Occupations – Initiated by Complaint
Progressive Enforcement

- Verbal—in person, phone, email
- BMP Correction Letter
- Follow-up Inspections
- Official Warning Notice
- Notice of Violation
Staff Training

- **Certified Erosion & Sediment Control Lead (CESCL):** 3 yr renewal
- **Hazardous Waste Operations and Emergency Response (Hazwoper):** 24 hour minimum (awareness level - we do not clean sites) and 8 hour annual refresher
- **Certified Stormwater Inspector:** 5 yr renewal
- **EPA Inspector:** National Enforcement Training Institute (online)
- **Others:** Dealing with difficult people, conflict resolution, communications, interpersonal skills, emotional intelligence
- **On the job training:** Source Control BMPs, County Codes, inspection techniques
Snohomish County Program History: 2007-2012

- Dedicated 4 FTEs
- Inspection inventory
  - Department of Revenue data- commercial, industrial and multifamily properties
- Verifying inventory through field reconnaissance
  - Closed, non-existent, relocated businesses
- Door to door site visit approach
  - Provided outreach material and collected data
  - Visited businesses (including qualifying home occupations) whether or not they drain to MS4
- Included TMDL business inspections
Snohomish County Program History: 2013-2017

- Excluded home-occupations, mobile businesses, & multi-family from inventory, except complaint-driven
- Inspections prioritized by previous non-compliance, inspection history, and potential to pollute
- Continued TMDL business inspections
- Revised program outreach materials
Over 5000 Site Evaluations Since 2009
Inspection Process - Tools Needed

- Record Keeping
- Program Literature
- Drainage Manual-Source Control BMPs
- Highly Trained Staff with Excellent Communication Skills
Record Keeping: Which Database is Right for You?

- Select a database
  - Site address
  - Record narrative
  - Store pictures
  - Track correspondence
    - Letters
    - Phone conversation logs – Dates, Content
    - Email
Site Specific Information & BMP Checklists
Program Literature

Environmental Resources

We Want to Partner with You
by visiting regional, state and national resources to develop and implement a sound water management program under the Clean Water Act.

What Will Happen if Problems are Found?

- We will recommend, provide assistance in planning and prioritizing necessary actions to prevent or minimize problems and assure your potential to provide local benefits.
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In Compliance with the Clean Water Act

- The program consists of Surface Water Management staff reporting information, technical, and agricultural specialists.

We Keep it Clean Using the 4Cs

- Cover outdoor work and storage areas
- Capture fluids before they run to the drain
- Clean spills before they reach the drain
- Contain stored fluids to capture leaks

Only Rain Down the Drain

- No Oil, No Suds, No Paint, No Chemicals
- Even small amounts can pollute our waterways
Drainage Manual

• Technical guidance manuals:
  – Dept. of Ecology-SWMMWW
  – King County Surface Water Design Manual
  – Snohomish County Drainage Manual
  – Conservation District Field Manuals
What, Where and How to Inspect?

- Identify
- Evaluate
- Enforce
- Track
- Report

Seeking Behavior Change Over Time
Resources to Businesses

• Spill Kit
• Spill Response Plan Template
• Sector Specific Information
  – Auto repair – 4 C’s poster, professional waste disposal contractor options
  – Animal Handling – Snohomish Conservation District material, compost facility manure disposal location information
Before and After BMP Technical Assistance

Needs Help

Better
Cover and Containment
Dumpster Area Maintenance
Outdoor Work Areas and Materials Storage
Waste Cooking Oil Storage
Waste Identification and Disposal

Expensive removal costs

3 months later
Improper Wastewater Discharge
TMDL Business Inspections

- FC TMDL Watersheds
  - Stillaguamish River
  - Snohomish River (lower tributaries)
  - Swamp Creek
  - North Creek
  - Little Bear Creek

- Commercial animal handling areas: veterinary, pet care, boarding services, and support activities for animal production

- Commercial composting facilities (Ch. 173-350 WAC)
Inspection Results

- 99 facilities inspected
- 6 non-compliant facilities
  - 5 equestrian (~10% equestrian facilities inspected)
  - 1 packing company
- 6 BMP deficiencies
  - Stockpile materials (manure/stable waste)
  - Erosion & groundcover
  - Sweep & clean animal areas
  - Slope potential contaminants away from MS4 & surface waters
  - Treatment of stormwater runoff (e.g. turbidity)
  - Exclusionary fencing
Barriers

• Manure Management
  • Manure accepting facilities
  • Manure spreaders
  • Labor/time for on-site composting

• Inspection implementation
  – Inventory generation
  – Reluctance
  – Groundwater impacts
Progress

Before

After
Importance of Partnerships

- Reinforce common messaging
- Provide consistency for business owners
- Provide options for business owners to work with different agencies
- Leverage efforts and funding
- Promotes inclusion

Types of Partnerships
- Snohomish Conservation District
- Snohomish Health District
- Department of Ecology
- Sustainable Land Strategies Group
- Other Municipal Permittees
What We Have Learned

• Behavior change is slow but possible
• Business owners and managers change frequently
• Businesses close and open- parcel use codes are more consistent
• Resource availability varies greatly
• BMPs need to be site specific and customized
Future Goals

• Increase regional coordination
• Target and prioritize business sectors
• Recognition and incentives for compliance
• Share information and support Phase II Permittees
• Work collaboratively internally, with outside agencies, and the business community
• Evolve to meet new permit requirements
Conclusion

• Program planning and development
  – Database, inventory, program materials, target specific sectors
• Provide technical assistance through inspections
• Be consistent and reliable in providing services
• Seek voluntary compliance
• Use progressive enforcement when needed
• Establish trust and rapport with business community
• Learn from others and learn by doing
Questions?
Contact Us

• Snohomish County-Surface Water Management Division
  – Laura Frolich, Public Works Supervisor
    425-388-6691, laura.frolich@snoco.org
  – Sean Hare, Pollution Prevention Specialist
    425-262-2652. s.hare@snoco.org

• Website: snoco.org