

## **NPDES Source Control Inspection Program - Site List Development and Modification**

### **Introduction**

This document has been developed in collaboration with other Phase I jurisdictions and describes the program by which [REDACTED] will prepare, and annually modify, a list of potentially pollution generating sites that meets the requirements of NPDES Phase 1 municipal stormwater permit section S5C7. Permittees must inspect 20% of the sites on the list in any given calendar year, but are not required to inspect 100% of sites over a 5 year period. Consequently, the list must contain a well-defined set of guidelines to identify appropriate sites and processes to include or remove these sites from a central database.

### **Business License and Parcels**

Depending on the permittee (City or County), the basic elements in compiling the initial list is either the business license (for Cities) or the legal land parcel (for Counties). The difference is due to the fact that most Cities have local business licenses, whereas Counties do not. However, due to the complexities and limitations of each method, the initial list may contain elements generated by both office records and field surveys. Through time, the list will be refined to maximize the number of elements that should be regulated as "sites" in the context of the source control program of the NPDES permit.

### **Official date of list**

Permittees must inspect 20% of the sites on the list in any given calendar year. To determine compliance with this requirement, the number of sites must be fixed for that year. The permit does not define a date upon which the official list for the year will be fixed. For the purposes of establishing the official number of sites by which to determine compliance metrics for any given calendar year, an "official" list will be established at a date within the jurisdiction's budget preparation schedule, with the understanding that as businesses are identified through field survey or other methods cited in this paper, they will be added (or dropped) from the list, as appropriate. Although the total number of businesses will remain constant, it is anticipated that the specific named businesses will shift as businesses relocate or additional businesses missed in records are found in the field. Thus the final list of inspected businesses at the end of the year may include some businesses not originally on the "official" list.

### **Initial site list development**

[REDACTED] developed its' list for the 2013 program using the current list of developed parcels located in the current stormwater audit program inventory. [REDACTED] will modify the inventory for use in future years by the following methods.

#### **Step 1 – assemble list of sites based on office records**

**Developed parcels with commercial or industrial zoning:** [REDACTED] has used the current commercial or similar stormwater fee classification in the drainage utility database for commercial and industrial zoned parcels. This list will be supplemented using the current municipal business licenses and any other sets of municipal records.

**Developed parcels with multifamily zoning (includes both apartments and condominiums):** [REDACTED] has defined properties with 3 or more residential units and current multifamily or similar stormwater fee classification for inclusion in the drainage utility database based on potential impact.

### **Step 2 – Add any sites identified by field or database surveys**

These databases are both internal to the [REDACTED] and external from other agencies. The databases include the following:

1. The existing database of business/commercial sites that have approved flow control and/or water quality treatment facilities (1,458 as of 2/1/09), which is maintained SWS;
2. The existing database of business/commercial sites with simple drainage conveyance systems (418 as of 2/1/09), which is maintained by SWS;
3. The existing database of all properties owned/operated by [REDACTED] (2,500), which is maintained by [REDACTED] Real Estate Services and the Department of Executive Services Facility Management section; and

These databases and their respective updates will be used to modify the current list of addresses, and winnow out those already listed via commercial, industrial, or multifamily zoning. These datasets will be verified by a combination of telephone, database and field verifications of the businesses existence, and relevance for inclusion in this program.

An additional step in the program will be to identify businesses by conducting field surveys of targeted roads or geographic areas with potential high density of businesses of interest. The program will select target roads or geographic areas and conduct "windshield surveys" to field identify business sites based on visible evidence of commercial activity such as advertising signs or commercial-scale or type of material storage or activities. These businesses will be verified by comparing them to the current database.

### **Modification of initial site list**

[REDACTED] will modify the initial list by the following methods:

- Modifying multiple legal parcels that should be dealt with as one site.
- Modifying single parcels with multiple businesses (e.g. shopping malls) that should be dealt with as multiple sites.
- Correcting database as occupant records change.
- Adding developed sites shown as undeveloped in office records.
- Identifying the presence of pollutant generating activities using citizen reports, field investigations, or other methods.

### **Exclusions from the List:**

Due to overlapping authority in stormwater compliance, Phase I Permittees propose the following exclusions from the Appendix 8 List:

- NPDES permitted sites within other permittee's jurisdiction;
- [REDACTED] a properties;
- Sites which fall under the jurisdiction of, are owned, or managed by Secondary Permittees; and,
- Those categories, which through an audit of existing inspection reports or field surveys representative of the category, are found to be non-pollutant generating.

### **Counting Inspections**

For the purpose of complying with the permit conditions to inspect 20% of the sites on the permittee's "official" list of pollution-generating businesses, the following shall be counted:

1. Inspections performed by staff of the permittee;
2. Inspections performed by contractors representing the permittee and for which the permittee performs any needed follow-up enforcement activity;
3. Inspections performed by staff from other jurisdictions under an MOA or MOU with the permittee (e.g. inspections performed by [REDACTED] in the Densmore basin under an MOA);
4. Inspection performed by Source Control Specialists funded by Ecology as part of the Local Source Control Program or the Urban Waters Initiative;

