2019

Source Control Pollution Prevention Program

Inspection Standard Operation Procedures

Revised September 12, 2019

TABLE OF CONTENTS

1 Introduction 1

1.1 Purpose 1

1.2 Background 1

1.3 Overview of Inspection Program 1

1.4 [redacted] Source Control Inspectors Team 2

1.5 Roles and Responsibilities of Source Control Team Members 2

1.6 Coordination with Other Programs and Regulations 3

2 Training 5

2.1 Safety 5

2.2 Safety Referrals 6

3 Source Control Inspection Procedures 7

3.1 Pre-Inspection 7

3.2 Inspection Materials and Equipment 7

3.3 Opening Conference 9

3.4 On-Site Records Review 9

3.5 Physical Walkthrough of the Facility 9

3.6 Exit Summary 10

3.7 Program Database and Documentation of Inspection 10

3.8 Follow-Up Inspections 11

3.9 Inspections with Internal/External Coordination 12

4 Progressive Enforcement 13

Appendices A.1

Appendix 1: Illustrations of Inspection Process and Institutional Framework A.1

Appendix 2: Business Inspection Program Response Letters A.3

A.2-1 Second Follow UP BMP Deficiency Letter Template A.3

A.2-2 Final Reminder BMP Deficiency Letter Template A.5

Appendix 3: Water Quality Investigation and Business Inspection Coordination A.7

Appendix 4: Commercial Animal Handling and Composting Facilities A.9

Appendix 5: Cartegraph Data Entry Workflow A.13

1 INTRODUCTION

1.1 PURPOSE

The purpose of this manual is to lay out standard operating procedures for the source control inspection program carried out by the Source Control Team in the Drainage Systems Management group within [redacted] Surface Water Management Utility.

The team administers the program under the authority of the [redacted] Code meets the requirements of state and federal law as well as the [redacted] Phase I Municipal Stormwater Permit (Phase I Permit) administered under the National Pollutant Discharge Elimination System (NPDES) by the Washington Department of Ecology. The Phase I Permit requires that specific stormwater source control programs be developed, implemented, and enforced.

Through the standard operating procedures described in this manual, the intent of the Source Control Team is to increase the consistency, effectiveness, efficiency, and transparency of its inspection and enforcement process; promote code compliance, and ultimately reduce the risk of pollution to the MS4 and surface waters of [redacted]

1.2 BACKGROUND

[redacted] Source Control Program was established in 2008 in response to the special provision S5.C.7. in the 2007 reissuance of the Phase I Permit, which required the County to administer a Source Control program with enforceable documents.

1.3 OVERVIEW OF INSPECTION PROGRAM

The source control inspection program focuses on providing compliance assistance to businesses conducting pollution-generating activities, which, when done without proper source controls, can result in pollutants being discharged into local waterways and the [redacted] MS4. The program is designed to assist businesses located in unincorporated [redacted] that are determined to have pollution-generating activities. Inspectors provide technical assistance for implementing best management practices pertinent to the site to prevent pollutants from entering the storm drain system.

The current inventory of businesses to inspect is property-based, using the [redacted] Assessor database of properties and parcel land use codes. As of 2016, there were 1,594 business properties or parcels in the inventory. The Phase I Permit requires annual inspection of 20% of the inventory list, and therefore the Source Control Team shall annually conduct 319 inspections. Among these business parcels, many contain more than one business tenant. Multiple inspections may be conducted at one parcel, with each inspection counting towards annual permit requirements.

1.4 [redacted] SOURCE CONTROL INSPECTORS TEAM

The mission of the Source Control Inspection Team is to prevent and reduce pollution to [redacted] MS4 to achieve a measurable reduction in the risk of pollution while working to meet regulatory compliance obligations. The team's specific objectives are as follows:

- Provide useful and accurate stormwater pollution prevention best management practices, technical assistance and education to businesses
- Provide effective, timely and comprehensive source control information
- Utilize progressive enforcement if businesses do not voluntarily comply with the code

The primary approach the source control inspection team uses to achieve compliance is education, technical assistance, and progressive enforcement.

1.5 ROLES AND RESPONSIBILITIES OF SOURCE CONTROL TEAM MEMBERS

The Source Control Team is organized with three levels of responsibility: Inspectors, a Source Control Lead, and a Drainage Systems Management Supervisor. The major responsibilities of each of these roles are outlined below. These role assignments help to ensure efficiency of the team's work and consistency in how the inspection program is carried out.

Key Inspector Responsibilities

Provide timely and courteous service to business and property owners

Provide consistent and accurate technical assistance to businesses and property owners

Manage the work load to meet individual inspection and team work plan goals

Manage the inspection process consistent with the policies and procedures of the team

Participate in team processes and trainings

Participate in local and regional coordination efforts with other agencies and municipal Permittee's

Key Lead Responsibilities

Provide program oversight and leadership, and work with Supervisor on team direction

Set and update procedures for the inspection process, with input from Inspectors

Provide technical and enforcement support to inspectors

Ensure consistency of the inspection process through periodic meetings and review and editing of inspector files, letters, and enforcement actions

Represent team needs in working with others outside the team

Ensure consistent application of program policies and enforcement procedures

Coordinate with Code Enforcement on enforcement issues

Key Supervisor Responsibilities

Set the overall program budget, including securing the labor and non-labor resources required

Work with the Team on setting program goals and team direction

Elevate difficult issues and cases to upper management and Electeds

Coordinate with other supervisors and managers regarding the program

Monitor and ensure that the program goals, budget, and work plan are followed

Work with inspectors on work performance and personnel issues

Responsible for ensuring NPDES Permit compliance is monitored and prioritized

Provide and require necessary trainings

1.6 COORDINATION WITH OTHER PROGRAMS AND REGULATIONS

Site inspections often require the coordination of several regulations and agencies to effectively and efficiently provide compliance assistance to a business with multiple environmental discharges. Source Control Business Inspectors strive to cooperate and coordinate with other agencies to conduct joint inspections when necessary and partners with them to achieve desired results. The main partners include:

- [redacted] ***Health District:*** The [redacted] Health District aims to improve the health of individuals, families, and communities, through disease prevention, health promotion, and protection from environmental threats.

- [redacted] ***Conservation District:*** The [redacted] Conservation District works with farmers, urban, suburban and rural landowners on a voluntary basis in order to promote and encourage conservation and responsible use of natural resources.

- ***Puget Sound Clean Air Agency:*** Puget Sound Clean Air protects the air and climate through education, incentives and enforcement.

- ***Washington State Department of Ecology Water Quality Program:*** The purpose of the Water Quality Program is to prevent point source pollution or reduce nonpoint source

pollution (or a combination of both) through: preventing point source pollution, reducing non point source pollution, controlling stormwater pollution, providing financial assistance and cleaning up polluted water.

- ***Washington State Department of Ecology Hazardous Waste Program:*** The HWTR Program coordinates five priority activities to address cleanup and management of existing hazardous waste and prevent generation of future waste. The agency is responsible for regulation of medium and large quantity generators (MQG's and LQG's).
- ***Washington State Department of Ecology Spills Program:*** The Spills Program focuses on preventing oil spills to Washington waters and land and ensuring effective response to oil and hazardous substance spills whenever they occur.
- ***United States Environmental Protection Agency (EPA):*** EPA is the federal agency responsible to protect human health and to safeguard the natural environment.

2 TRAINING

[redacted] inspectors are trained across a variety of disciplines to prepare them for the inspection process. The list below includes examples of trainings inspectors may participate in.

- Certified Stormwater Inspector
- 40 Hour OSHA HAZWOPER
- CESCL
- Audience Research
- County Employee Safety and Active Shooter
- SWM Field Safety
- First AID/CPR
- Aggressive Dog

2.1 SAFETY

One of the goals of [redacted] is to promote a safe and healthy workplace and to empower employees to take personal responsibility for their own safety. The Source Control Inspection Program takes this goal seriously and strives for healthy and safe working conditions in the workplace, in the field, and especially while carrying out inspection duties at unfamiliar facilities. Some important safety principles include the following:

- Inspectors should maintain an awareness of their surroundings at all times during the inspection process. If a situation becomes unsafe, either due to unsafe conditions at the facility or due to the temperament of the business representative, the Inspector should politely terminate the inspection and leave the site. Following are precautions that Inspectors should take to help avoid unsafe situations:
    - Inspectors should have cell phones charged and switched on during work hours so as to be accessible to other team members.
    - Inspectors should pair up for inspections which are large or that they believe could benefit from having two inspectors present.
    - Inspectors should be aware of exit routes at all times during the inspection.
    - Inspectors should leave a site if they feel that their safety may be in jeopardy due to unsafe site conditions, difficulties interacting with the owner, or any other reason.
    - Inspectors may arrange for a police escort to a site by calling the local precinct or the Police non-emergency number.
- When removing maintenance hole covers or handling other heavy objects, proper lifting technique should be used. Try to stretch major muscle groups before doing strenuous

activity (see exercises posters in the work area for guidance). An inspector should ask for help if necessary, and to the extent helpful, learn to use tools that aid in lifting heavy objects.

- All inspectors are responsible to keep their required safety training up to date. Coordination for safety training is conducted through the Division Admin staff.

2.2 SAFETY REFERRALS

3 SOURCE CONTROL INSPECTION PROCEDURES

3.1 PRE-INSPECTION

Prior to going out in the field, the inspector shall conduct research to gather background information on the sites they are visiting. There are a number of steps to take during the pre-inspection process:

1. Know your inspection areas
2. Prioritize your inspection areas
    a. Business Parcels that haven't been visited
    b. Business Parcels that have the highest potential to pollute
    c. Business Parcels located in a TMDL area
3. Determine if an appointment is needed for the inspection (i.e large sites such as lumberyards, car tow yards, salvage yards, etc.)
4. Understand the business type and activity onsite
5. Check PARIS (Water Quality Permit and Reporting Information System, at https://apps.ecology.wa.gov/paris/PermitLookup.aspx). If there is an existing stormwater or water quality permit (e.g. Industrial Stormwater Permit, Sand and Gravel, :Airport, Boatyard, etc.).
    a. Review permit documents on PARIS as needed.
    b. Optional: may coordinate on a joint site visit with Ecology.
    c. Progressive enforcement may involve Ecology depending on the circumstances; check with lead/supervisor.
6. Research and know pertinent BMPs for the activities conducted onsite
7. Research previous inspections to understand the history of the site
8. Review onsite drainage through Cartegraph if it's available

3.2 INSPECTION MATERIALS AND EQUIPMENT

The business types Snohomish County pollution prevention inspectors visit may require varying levels of safety equipment. Table 1 below includes a list of materials and personal protective equipment that may be necessary to complete an inspection.

Table 1. Inspection Equipment for Source Control Inspectors

Documents and Inspection Tools

- Business cards
- Field notebook
- Outreach materials
- Clipboard
- Cell phone
- Flashlight
- Cartegraph Asset Management Software (iPad)
- Facility file (records and maps)
- Camera

Personal Protective Equipment

- Hard hat
- Hearing protection
- Safety shoes (steel toe)
- Reflective safety vest
- Safety glasses
- Gloves

3.3 OPENING CONFERENCE

Upon arrival at the inspection site, the inspector should introduce themselves as a [redacted] Surface Water Management employee and offer the appropriate credentials (i.e. business card). Personnel should request to speak with a manager or owner. If a manager or owner is not available, personnel should request respective employee assist directly. After introductions, the inspector should distribute program literature and discuss the Source Control Program. Personnel should discuss the activities conducted on-site to determine the scope of the inspection. Personnel should communicate to the company representatives the reason and extent of the inspection, which include the following:

- On-site records review
- Physical walkthrough of the facility
- Summary discussion with company official

3.4 ON-SITE RECORDS REVIEW

Inspectors should request to see applicable onsite documentation as required by Volume IV of the [redacted] Drainage Manual. Examples of applicable documentation include spill plans, site maps, stormwater facility maintenance records and employee training logs. Inspectors may request to photograph documentation to later add to the inspection task entry.

3.5 PHYSICAL WALKTHROUGH OF THE FACILITY

Along with review of any applicable on-site records, the next phase of the inspection is the physical walkthrough of the facility site. The scope of the inspection is dependent upon the onsite activities. For some facilities, there are minimal business activities conducted outside. A list of general things an inspector may view is as follows:

- On-site BMPs
- Evidence of past spills
- Material handling and storage areas, including loading/unloading areas
- Equipment fueling and maintenance areas
- Vehicle washing area/indicators
- Waste disposal areas
- Indicators or presence of illicit connections and improper disposal
- Storm drain structures and receiving streams
- Ground disturbance and contamination

Throughout the inspection, inspectors should provide feedback regarding operational and structural BMPs. If there are deficiencies observed, personnel should discuss the deficiencies and required solutions directly with facility representatives at the time of the observation if possible. Photographs should be taken throughout the inspection. In general, all photos should have a reference object for scale (such as a person, a car, or other familiar object). These photos are especially important to document deficiencies to aid in the case of a potential enforcement proceeding.

3.6 EXIT SUMMARY

The exit summary with the facility representative serves as an opportunity to summarize the results of the inspection, answer any remaining questions, and provide additional technical assistance. If the facility is in compliance with the source control requirements, inspectors can thank the facility and conclude the inspection. If during the inspection, BMP deficiencies were observed, inspectors should reiterate deficiencies, the requested corrections, and establish the timeline for corrections. Inspectors should provide an opportunity to answer any additional questions, and to provide additional technical assistance. The exit summary should conclude by discussing next steps, such as communication or follow-up visits. This is also the appropriate time to ensure the mailing address is correct for deficiency letters.

3.7 PROGRAM DATABASE AND DOCUMENTATION OF INSPECTION

The [redacted] Surface Water Management Group uses Cartegraph Operations Management System to record and track inspections. After an inspection, the inspector should enter the data into Cartegraph as soon as possible. Personnel should follow the workflow found in Appendix 5 *Cartegraph Data Entry Workflow* for data entry. A summary of general database attributes are included in Table 2 below. Personnel should be sure to continually update the inspection task entry as additional information is generated, such as follow-up inspections, phone calls and emails.

If the facility was determined to be non-compliant, a letter should be generated using the template found in Appendix 2 *Business Inspection Program Response Letters* in Section 2.1, and mailed to the responsible party at the facility or property. The date of re-inspection should be approximately 30 days from the time of the inspection, or reflecting the date and time discussed during the exit summary.

Table 2. Potential database attributes associated with a Source Control Inspection Task on the Cartegraph system.

General Information	Action Items
Unique Business Identifier	Compliant
Parcel Number	Compliant-Minor Corrections
Business Name	Denied Entry-Closed
Contact	Email Received
Site Address	Email Sent
Business Type	Follow-Up Inspection
Unique Task ID	G3 Sent
Status	Herbicide Pesticide Fertilizer Outreach
Entry Date	Illicit Connection Discovered
Start Date	Illicit Discharge Detected
Completion Date	Initial Inspection
Inspector Assignment	Letter Received
Source Control BMPs (from Volume IV of Snohomish County Drainage Manual)	Letter Sent
	No Access-Closed
	No Inspection Performed
	Non-Compliant - Corrections Required
	Notified Other County Department or Division
	Notified Outside Agency
	Other
	Phone Call
	Provided Spill Kit

3.8 FOLLOW-UP INSPECTIONS

Check in Call/ Prepare for re-inspection

Approximately 10 days before the re-inspection deadline, call the business to review the corrective actions and check on their compliance status. Confirm the re-inspection appointment to ensure they will be onsite.

Conduct re-inspection

At the re-inspection appointment, the inspector conducts the re-inspection, to verify that all corrective actions have been completed. Photographs should be taken of the completed actions or outstanding deficiencies. All documentation of corrections should be included in the inspection task entry.

Inform the site manager of re-inspection findings and next steps

If the corrective actions have been completed in a satisfactory manner, the inspector informs and thanks the owner for their cooperation at the time of the re-inspection. If the corrective actions have not been completed, the inspector informs the site manager of the next steps (see

below) in the compliance process. The inspector should review the necessary corrective actions and states the expectation for achieving compliance within the appropriate timeframe.

Update inspection task entry

The inspector updates the site inspection entry with the site inspection information. For each visit to the site after the original inspection, a follow-up inspection and notes should be entered into the database.

If corrective actions have not been completed, the next step in progressive enforcement may begin. [redacted] Progressive Enforcement Procedures can be found in the section below.

3.9 INSPECTIONS WITH INTERNAL/EXTERNAL COORDINATION

Appendix 3 *Water Quality Investigation and Business Inspection Coordination* discusses coordination for business sites where a spill or discharge has been reported and is under investigation.

Appendix 4 *Commercial Animal Handling and Composting Facilities* discusses inspections for business sites with animal handling or composting facilities. Previous inspections during the 2013-19 NPDES permit term involved notification of property owners and coordination with the [redacted] Conservation District. Future inspections may involve a similar process.

4 PROGRESSIVE ENFORCEMENT

If [redacted] determines that a business has failed to adequately implement required BMPs, the [redacted] takes follow-up actions which may include: verbal coaching/phone calls, deficiency letters, follow-up inspections, a warning letter, and enforcement actions (including monetary penalties and/or criminal prosecution) under chapter [redacted].

[redacted] maintains records including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records demonstrating an effort to bring facilities into compliance. [redacted] also maintains records of sites that are not inspected because the property owner denies entry.

All records are stored electronically and managed through the Cartegraph database.

[redacted] progressive enforcement steps are as follows.

- Verbal Coaching: Verbal coaching is employed when an inspection reveals minor issues with a current business practice or procedure, such as failing to keep dumpster lids closed or failing to sweep work or storage areas as needed. These minor concerns do not represent an immediate threat to health, human safety or the environment. At this step it is uncommon for a follow-up inspection to occur. Depending on the issue identified during the inspection, phone calls or emails may be used to communicate with the business to ensure that corrective actions were implemented. Such communication is documented as a follow-up action in the Cartegraph database.

- Deficiency Letter: An official letter is sent to a business when an inspection reveals deficiencies in behavioral, operational or structural BMPs. The deficiencies shall be addressed by the business. The letter indicates a timeframe for a follow-up inspection (typically 30-60 days from the date the letter is mailed), unless other arrangements are coordinated with [redacted] staff and the business. Follow-up inspection dates and times may be extended at the discretion of [redacted] staff based on the significance of the deficiencies, the nature of any extension request, or demonstration of the business's progress toward meeting compliance objectives. A second deficiency letter may be sent. A sample template for a deficiency letter, which may be adapted and used for an initial or second letter, is given in the Appendix 2 *Business Inspection Program Response Letters* (see Section 2.1, where a second deficiency letter example is given).

- Follow-up Inspection: [redacted] staff performs follow-up inspections of businesses to which a deficiency letter was sent. The purpose of these inspections is to assess the level of progress made by each business to correct deficiencies identified in the deficiency letter. [redacted] staff review deficiency items with the business representative. [redacted] staff determine the level of compliance the business has achieved as of the date of the follow-up inspection and inform the business either that it has successfully addressed the deficiencies, it has not adequately addressed the deficiencies, or additional deficiencies have been identified. Compliance status is communicated in person and recorded in the electronic tracking system, Cartegraph. If [redacted] staff observe new deficiencies during the follow-up inspection, an additional letter is sent to the business.

- Final Deficiency Letter: A final deficiency letter is issued after an initial deficiency letter and follow-up inspections have not prompted adequate progress by the business to address required corrections. The warning letter serves to offer the business a final chance to correct deficiencies prior to [redacted] initiating a formal enforcement action. This

ensures [redacted] inspectors are making a good faith effort to compel compliance prior to exercising enforcement action authorities. A sample template for a final deficiency letter, is given in the Appendix 2 (see Section 2.2).

- Enforcement Action: When [redacted] staff determines that a business has failed to adequately implement BMPs after one or more follow-up inspections, the matter is referred to PDS for enforcement action. [redacted] inspectors and PDS code enforcement officers coordinate on matters of non-compliance to determine the appropriate course of action, which can include a warning notice, a notice of violation (NOV), and penalties. PDS manages the enforcement process, including correspondence, recordkeeping, the hearing if the NOV is appealed, and final resolution of the matter. [redacted] inspectors support PDS's efforts by providing subject matter expertise in identifying the deficiencies, determining the remedies, providing expert testimony when a matter goes to hearing, and assisting with the final inspection to determine compliance.

  If the [redacted] cannot secure compliance through this progressive enforcement program, the case will be referred to Ecology.

APPENDICES

APPENDIX 1: ILLUSTRATIONS OF INSPECTION PROCESS AND INSTITUTIONAL FRAMEWORK

Exhibit 1 below illustrates the inspection process discussed in Sections 3 and 4 of this SOP guidance.

Exhibit 2 on the next page is a working draft illustration of the institutional framework in which the inspection process takes place. The institutional framework includes regulations, administration, recordkeeping (database), and personnel and work resources. Exhibit 2 is a draft illustration and is provided solely for education and discussion purposes.

Exhibit 1: [redacted] Source Control Business Inspection Process

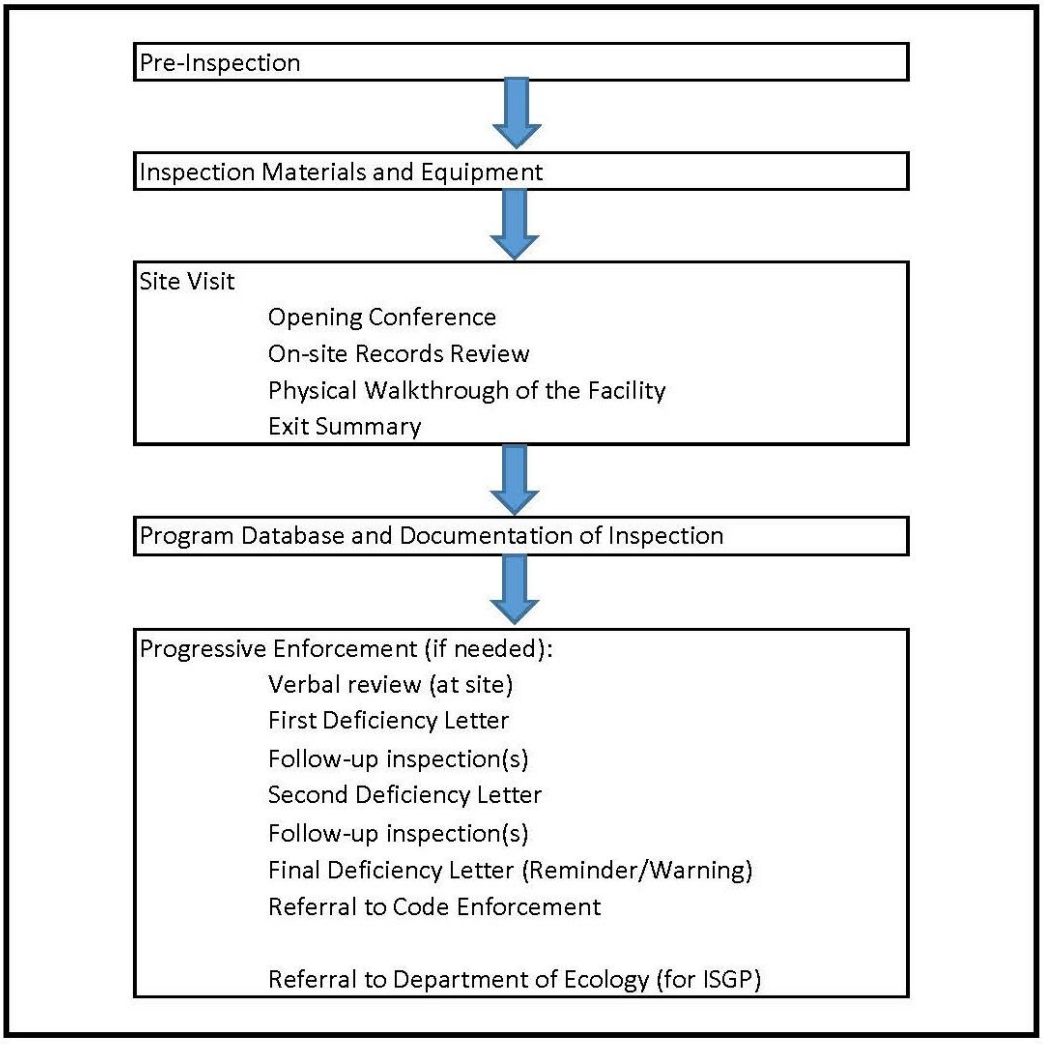
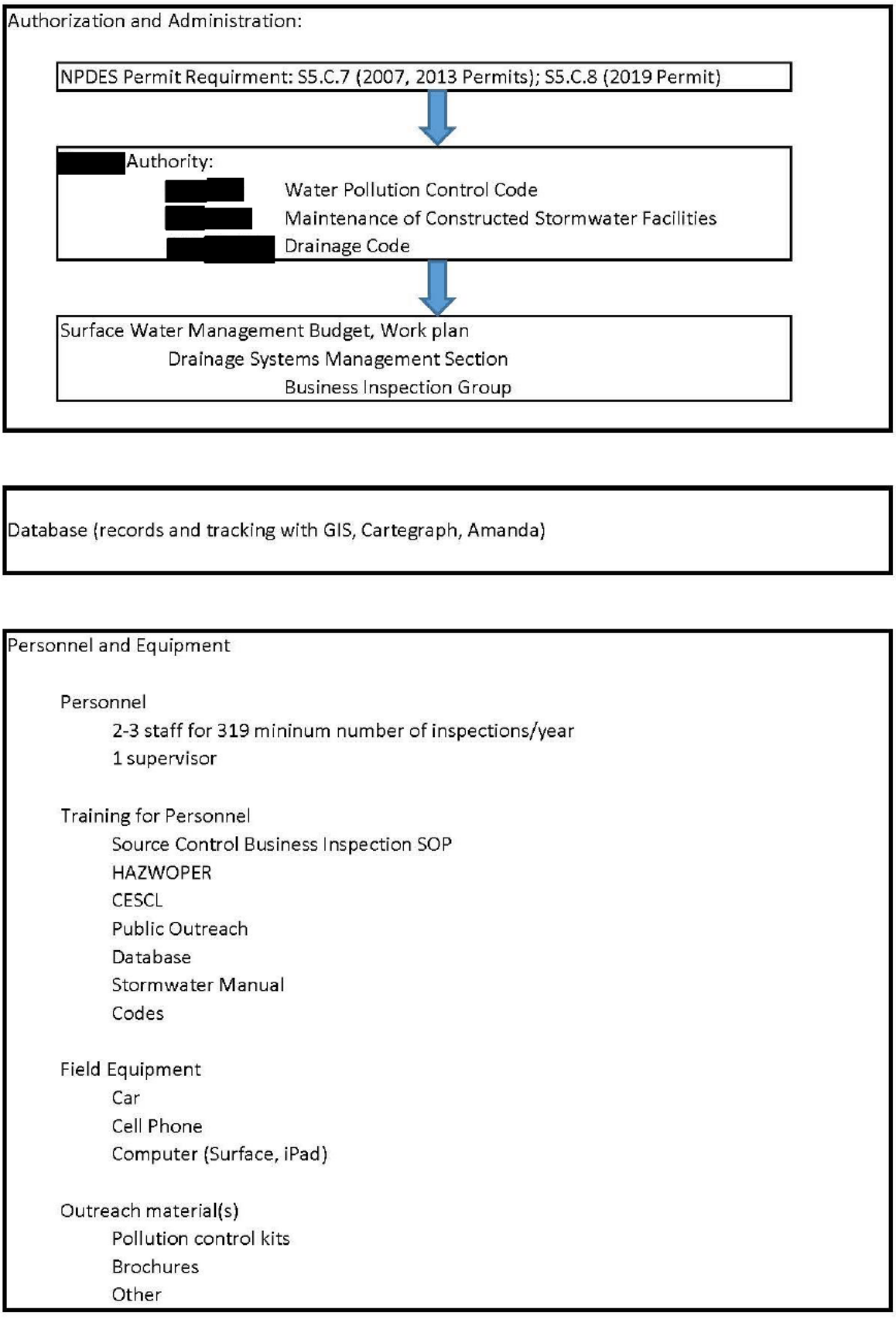


Exhibit 2: Illustration of Institutional Framework (Working Draft)



APPENDIX 2: BUSINESS INSPECTION PROGRAM RESPONSE LETTERS

A.2-1 Second Follow UP BMP Deficiency Letter Template

[redacted]

[redacted]

<<Date (letter composed): auto date to today's date>>

[redacted]

SECOND NOTICE: DEFICIENT BMPs FOR PROPER STORAGE OF MATERIAL

<<Name of Business Owner/Business Manager>>
<<Address>>

Dear Property Owner/Property Manager:

Re: <<Address of Parcel or Shopping Center Name>>

Thank you for your cooperation during our National Pollution Discharge Elimination System (NPDES) source control inspection that was first conducted on <<date initial inspection was conducted>>. At the initial inspection, county staff observed deficient BMP's and an original letter was <<discuss whether the letter was mailed/hand delivered/emailed/all of the above and the date along with any follow-up actions taken>>. After extending the deadline multiple times, all of the corrected action items still have not been addressed. This is the second letter reminding you of the BMPs that have not been addressed and need to be implemented within the next 30 days.

[redacted] is required to inspect businesses under a federal law entitled the *Clean Water Act* to alleviate conditions that can contribute to increased stormwater pollution. The Washington Department of Ecology is administering the *Clean Water Act* requirements locally by issuing [redacted] a Municipal Stormwater Permit. As a result of this permit, the [redacted] *Water Pollution Control Code* [redacted] and *Drainage Code* [redacted] require that businesses implement Best Management Practices (BMPs) to reduce the amount of pollution discharged to [redacted] stormwater drainage systems. The [redacted] *Drainage Manual* [redacted] details required BMPs.

We are available to provide technical assistance to businesses to achieve compliance; however, it is up to you to implement the necessary BMPs to comply with [redacted] Code.

[redacted] staff has conducted multiple follow-up inspections and will be escalating the issue to ensure that the BMPs enclosed in this letter are addressed.

To view [redacted] Drainage Manual Volume IV and other program related information and material:

- Go to [redacted] then type keywords – Business Inspection Program

Thank you for your prompt attention to this matter. If you have any questions or concerns regarding the inspection or identified corrections, please contact me at <<Inspecto'rs phone number >> or <<Inspecto'rs email >>.

Sincerely,
<<Inspector's Name (bold font)>>**,** Planner
Business Inspection Program
[redacted] Surface Water Management

Enclosures:

<<Photos, site plan, etc. deficient BMPs>>

<<Description of what was seen onsite, what staff was told regarding the site (from business worker), and any potential changes from the first site visit>>

Required Actions:

<<List of required BMPs>>

Please understand that you are responsible for compliance with all code and permit requirements that may be applicable to complete the corrective action(s) set forth above. If you have questions about permit requirements, please call [redacted]

A.2-2 Final Reminder BMP Deficiency Letter Template

[redacted]

<<Date (letter composed): auto date to today's date>>

FINAL WARNING: DEFICIENT BMPs FOR PROPER STORAGE OF MATERIAL

<<Name of Business Owner/Business Manager>>
<<Address>>

Dear Property Owner/Property Manager:

Re: <<Address of Parcel or Shopping Center Name>>

This is your final warning letter regarding the deficient best management practices (BMPs) that need to be implemented at your property. During our National Pollution Discharge Elimination System (NPDES) source control inspection that was first conducted on <<date initial inspection was conducted>>, county staff observed deficient BMP's which are enclosed in this letter.

An original letter was <<discuss whether the letter was mailed/hand delivered/emailed/all of the above and the date along with any follow-up actions taken>>, and a second notice reminding you of the deficient BMP's that need to be implemented was <<discuss whether the letter was mailed/hand delivered/emailed/all of the above and the date along with any follow-up actions taken>>.

After extending the deadline multiple times, conducting multiple follow-up inspections, and sending multiple notices for deficient BMPs, all of the corrected action items still have not been addressed.

The [redacted] *Water Pollution Control Code* [redacted], and *Drainage Code* [redacted] require that businesses implement Best Management Practices (BMPs) to reduce the amount of pollution discharged to Snohomish County stormwater drainage systems. The [redacted] *Drainage Manual (Volume IV)* details required BMPs.

If [redacted] Surface Water Management determines that your property has failed to adequately implement BMPs after multiple follow-up inspections and multiple deficiency letters sent, under [redacted], we have the right for progressive enforcement. If the business inspector is not contacted or the required actions taken, the matter will be referred to our Planning and Development Services for enforcement action.

We are available to provide technical assistance to businesses to achieve compliance; however, it is up to you to implement the necessary BMPs to comply with [redacted] Code.

To view [redacted] Drainage Manual Volume IV and other program related information and material:

- Go to [redacted] then type keywords – Business Inspection Program

Thank you for your prompt attention to this matter. If you have any questions or concerns regarding the inspection or identified corrections, please contact me at <<Inspecto'rs phone number >> or <<Inspecto'rs email >>.

Sincerely,
<<Inspector's Name (bold font)>>**,** Planner
Business Inspection Program
[redacted] Surface Water Management

Enclosures:

<<Photos, site plan, etc. deficient BMPs>>

<<Description of what was seen onsite, what staff was told regarding the site (from business worker), and any potential changes from the first site visit>>

Required Actions:

<<List of required BMPs>>

Please understand that you are responsible for compliance with all code and permit requirements that may be applicable to complete the corrective action(s) set forth above. If you have questions about permit requirements, please call [redacted]

APPENDIX 3: WATER QUALITY INVESTIGATION AND BUSINESS INSPECTION COORDINATION

Under NPDES Phase I Permit Source Control requirement S5.C.8.b.iii(c), [redacted] is required to inspect 100% of sites identified through credible complaints that concern stormwater quality.

- [redacted] Water Quality Investigation group (Water Quality) responds to requests for water quality investigation arising from externally received complaints about pollution events or issues (e.g., spills, sewer cross connection, etc.). Water quality problems may also be encountered by [redacted] personnel in the course of other [redacted] business, and are internally referred to Water Quality. Water Quality also responds to alerts from ERTS (Environmental Report Tracking System (Washington State Department of Ecology)).

- Water Quality sets up a case task in the [redacted] Cartegraph database and conducts initial review focused on the pollution event or issue, and determines the probable cause(s) of the water quality problem.

- If the water quality problem is at a business site, and is determined to be a source control issue, the site is referred to [redacted] Source Control Team for further source control follow up. The referral is done by assigning Source Control Team staff to the case task, who are notified automatically by email upon assignment.

- The assigned Source Control Team staff performs source control review and support for the specific site of concern as a follow up activity to the Water Quality initial review. The source control review is recorded in the [redacted] Cartegraph database.

- Water Quality and Source Control staff communicate and coordinate further as needed in the handling of business site cases and follow up actions.

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APPENDIX 4: COMMERCIAL ANIMAL HANDLING AND COMPOSTING FACILITIES

Under NPDES Phase I Permit TMDL requirements in Appendix 2 of the permit, [redacted] is required to inspect commercial animal handling areas and composting facilities to ensure implementation of source controls for bacteria, for the following watersheds:

[redacted]

The initial animal handling and composting facility inspection process differed from general source control inspection in that notice was given to subject sites of pending inspection, and support was offered by the [redacted] Conservation District to facility operators and owners in developing and implementing best management practices. The report, "2016 Pollution Source Control Inspections at Commercial Animal Handling and Composting Facilities," describes the steps taken in preparation, implementation, and evaluation of the commercial animal handling and composting facilities inspection program. The general steps were:

1. Inventory development based on SIC 074 and 075, and WAC 173-350-200. Dairy and non-dairy permitted concentrated animal feeding operations were not included in the inventory.

2. Mailing of pre-inspection letters. Exhibit 1 gives an example of a pre-inspection letter from the 2016 report.

3. Inspection. During the site visits, [redacted] inspectors informed facility owners and operators of the services the [redacted] Conservation District provided. If issues of non-compliance arose owners had the option to work with the [redacted] Conservation District, in addition to or in lieu of working with [redacted] inspectors, to achieve compliance.

4. A final source control inspection was conducted by [redacted] staff to verify final compliance. This was performed regardless of whom facility owners and operators worked with to address non-compliance issues.

A similar process is contemplated for inspections of commercial animal handling areas and composting facilities under the 2019 permit.

Exhibit 1: Sample Pre-Inspection Letter

[redacted]

[redacted]

Property Owner
Business Name
Street Address
City, WA Zipcode

RE: Pollution Control Site Visit Notification

Dear Property Owner/Operator:

As part of [redacted] ongoing goal to improve water quality in local creeks, rivers, and Puget Sound, we seek to perform a site visit at your commercial property, so that we can discuss with you practices related to animal waste storage, handling and disposal. You should expect a Pollution Prevention Specialist to visit your commercial site between May 1 and August 1, 2016. We are partnering with the [redacted] Conservation District to ensure the County meets its water quality permit obligations required under the *Clean Water Act,* with as little impact to your business enterprise as possible. We recognize your role in protecting our water resources and hope to validate your ongoing efforts.

[redacted] **is required to inspect commercial animal handling sites and commercial composting facilities to ensure implementation of best management practices (BMPs) and site compliance for water quality protection.** Qualifying properties perform animal handling and/or composting activities and are located in drainage basins with high concentrations of bacteria [redacted] Your property has been identified as meeting the qualifying criteria. Commercial animal handling facilities include veterinary services, pet care, commercial kennels, animal boarding, and animal slaughtering.

During our site visit, we will evaluate your operational practices that have the potential to impact water quality and discuss required BMPs that ensure pollution prevention. If desired, after our site visit we can connect you with the [redacted] Conservation District, who can provide additional services and technical assistance. **Site visits are expected to last approximately one hour and are at no cost to the owner/operator.** To prepare for your site visit you may consider: identifying surface water features on or adjacent to your property (streams, rivers, and roadside ditches); reviewing the attached list of BMPs from the [redacted] *Drainage Manual: Volume IV - Source Control BMPs*; and evaluating your specific animal/pet waste storage and disposal practices.

The **Pollution Source Control Program** is a requirement of the [redacted] municipal stormwater permit, which is issued by the Washington State Department of Ecology and is mandated by the federal National Pollutant Discharge Elimination System program. In effect since 2009, the Pollution Source Control Program's objective is to control and prevent water pollution from commercial, industrial and certain agricultural properties by ensuring the implementation of BMPs. Using the [redacted] *Drainage Manual: Volume IV-Source Control BMPs*, Pollution Prevention Specialists provide technical assistance,

perform follow up site inspections and work closely with business owners to encourage the use of BMPs. The [redacted] *Water Pollution Control Code* [redacted] requires the use of BMPs and therefore non-compliant sites are subject to code enforcement. As a regulated county, state and federal agencies expect us to use our regulatory mechanisms when necessary, yet prior to any code enforcements actions we work diligently with the public in order to achieve compliance. This program's success is founded on generating awareness that leads to voluntary compliance from business owners.

We value your agricultural enterprise's contribution to [redacted] and appreciate your willingness to protect water resources. Thank you for your time and active participation in these efforts. If you have any questions, concerns or would like to learn more about our program please contact me. We look forward to working with you to accomplish our water resource protection goals.

Sincerely,

<Name>
<Title>
[redacted]
<Phone>

[redacted]

NOTE: *If you operate a mobile business and your operations do not involve any aspect of animal waste management or you feel you have received this letter in error, please contact* [redacted]

[redacted]**Drainage Manual: Volume IV, Chapter 3**
Source Control BMPs Required For Specific Activities or Land Uses
[redacted]

Chapter 3.2 BMPs for Commercial Animal Handling Areas

Description of Pollutant Sources

Animals at racetracks, kennels, fenced pens, veterinarians, and businesses that provide boarding services for horses, dogs, cats, etc., can generate pollutants from the following activities: manure deposits, animal washing, grazing and any other animal handling activity that could contaminate stormwater. Pollutants can include coliform bacteria, nutrients, and total suspended solids.

Source Control BMPs

- ❑ Regularly sweep and clean animal keeping areas to collect and properly dispose of droppings, uneaten food, and other potential stormwater contaminants
- ❑ Do not hose down to storm drains or to receiving water those areas that contain potential stormwater contaminants
- ❑ Do not allow any washwaters to be discharged to storm drains or to receiving water without proper treatment
- ❑ If animals are kept in unpaved and uncovered areas, the ground must either have vegetative cover or some other type of ground cover such as mulch
- ❑ Surround the area where animals are kept by a fence or other means that prevents animals from moving away from the controlled area where BMPs are used.

Chapter 3.3 BMPs for Commercial Composting

Description of Pollutant Sources

Commercial compost facilities, operating outside without cover, require large areas to decompose wastes and other feedstocks. These facilities should be designed to separate stormwater from leachate (i.e., industrial wastewater) to the greatest extent possible. When stormwater is allowed to contact any active composting areas, including waste receiving and processing areas, it becomes leachate. Pollutants in leachate include nutrients, biochemical oxygen demand (BOD), organics, coliform bacteria, acidic pH, color, and suspended solids. Stormwater at a compost facility consists of runoff from areas at the facility that are not associated with active processing and curing, such as product storage areas, vehicle maintenance areas, and access roads.

Source Control BMPs

- ❑ Train employees to ensure that the compost feedstocks do not contain dangerous wastes, regulated under Chapter 173-303 WAC or hazardous products of a similar nature, or solid wastes that are not beneficial to the composting process.
- ❑ Develop a plan of operations if required in accordance with NPDES permit or State Waste Discharge permit.
- ❑ Store finished compost in a manner to prevent contamination of stormwater.

NOTE: Discharge of leachate from a compost facility will require a State Waste Discharge Permit or NPDES permit from Ecology, depending on the disposal method chosen for managing leachate at the facility An additional alternative, zero discharge, is possible by containing all leachate from the facility (in tanks or ponds) or preventing production of leachate (by composting under a roof or in an enclosed building). Chapter 7.53 SCC states that full implementation of all BMPs required by an NPDES industrial stormwater permit or State Waste Discharge Permit shall constitute compliance with that code chapter.

The BMPs listed above are a sample of applicable BMPs; additional BMPs can be found in the [redacted] *Drainage Manual, Volume 4*. BMPs from the USDA Field Office Technical Guide and the Washington State Department of Ecology *Stormwater Management Manual for Western Washington* may be subsituted for applicable BMPs from the [redacted] *Drainage Manual*, if determined to be equivalent by the Director of Public Works or their designee.

APPENDIX 5: CARTEGRAPH DATA ENTRY WORKFLOW[1]

(Separate Appendix, at this pathname:

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Cartegraph
Inspection Work Flo

[1] Separate Appendix, titled *Cartegraph Data Entry Workflow,* [redacted]