

CHAPTER 5: CONDUCTING BUSINESS/SITE INSPECTIONS

PART OF THE SOURCE CONTROL (BUSINESS/SITE) INSPECTION PROGRAM GUIDANCE MANUAL

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Note:

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Table of Contents

CONTENTS

5. Conducting Business/Site Inspections	1
5.1. Permit Requirements	1
5.2. Equipment and Materials	2
5.3. Guidance for New Inspectors	2
5.4. Inspection Process	3
5.4.1. Pre-Inspection Activities	5
5.4.2. Conducting the Inspection	8
5.4.3. Follow-Up Activities	12

TABLES

Table 5.1. Recommended Inspection Equipment and Materials	2
Table 5.2. Recommended Inspection Form Elements	8
Table 5.3. Inspection by Area/Activity and Common Source Control BMPs	10

FIGURES

Figure 5.1. Business/Site Source Control Inspection Process	4
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5. CONDUCTING BUSINESS/SITE INSPECTIONS

This chapter includes guidance for conducting business/site inspections including recommended equipment and materials, guidance for new inspectors, as well as specific guidance on pre-inspection activities, business/site inspection activities, and follow-up activities. Supplemental resources to support this chapter can be found in the [Source Control Online Resource Library \(SCORL\) for Chapter 5](#).

5.1. PERMIT REQUIREMENTS

[Chapter 1: Background and Regulatory Requirements](#) of this manual provided an overview of the National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater permit requirements related to the source control inspection program.

The NPDES Municipal Stormwater Permit specifies the focus of the inspections, the standards to be achieved by the inspections, and the inspection approach. The focus of the inspections is compliance with the proper application and maintenance of operational and structural source control best management practices (BMPs) (Western Washington 2019-2024 Phase II Permit, S5.C.8.a.i).

*"a. The Permittee shall implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program shall include:
(1) Application of operational source control BMPs, and if necessary, structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities."*

The achievable standard expected is that BMPs are applied to all potential pollutant generating sources which can be accomplished through education and technical assistance (Western Washington 2019-2024 Phase II Permit, S5.C.8.b.i).

"(i)...Applicable operational source control BMPs shall be required for all pollutant generating sources. Structural source control BMPs, or treatment BMPs/facilities, or both, shall be required for pollutant generating sources if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards because of inadequate stormwater controls. Implementation of source control requirements may be done through education and technical assistance programs..."

5.2. EQUIPMENT AND MATERIALS

The equipment and materials needed for conducting an inspection will vary based on the information gathered during the inspection and the type of business/site that will be inspected. The inspector should be prepared with the appropriate documents, field equipment, and safety equipment. Recommended equipment and materials for business/site inspections are listed in Table 5.1.

Documents	Inspection Equipment	Safety Equipment
<ul style="list-style-type: none"> ● Business cards ● Outreach materials ● Business/site file (site plans, records, maps) ● Field laptop/tablet (for electronic recordkeeping) or clipboard, inspection forms, and pen/pencil ● Owner/site manager contact information 	<ul style="list-style-type: none"> ● Camera, phone, or other mobile device for taking pictures with time/date stamp enabled (and location tag, if available) ● High powered lamps or hand-held spotlights ● Manhole cover hook or lid lifter ● Metal probing rod ● Various wrenches (including hexagonal Allen key) ● Shovel or rake ● Fluorescent dye (optional) ● Sample bottles (optional) ● Chemical test strips (optional) 	<ul style="list-style-type: none"> ● Hard hat ● Steel-toe boots ● ANSI 107-1099 labeled safety vest ● Safety glasses ● Leather or heavy cloth gloves ● Latex gloves ● Hearing protection (optional, depending on site activities)

5.3. GUIDANCE FOR NEW INSPECTORS

New inspectors should review the inspection program standard operating procedure (SOP) (see [Chapter 4: Developing a Business/Site Inspection Program](#)), participate in training opportunities (see [Chapter 8: Training](#)), and implement an inspection approach that aligns with the program goals.

New inspectors will benefit from shadowing experienced inspectors prior to conducting inspections on their own. "Ride-alongs" provide the new inspector with an understanding of how to prepare for a site visit, conduct the visit, and implement post-inspection data management and follow-up actions. Cross-training with other programs, such as the private BMP/facility maintenance program or local Pollution Prevention Assistance (PPA) program can also provide an opportunity to understand how the programs overlap or potential benefits that may result from working collaboratively (see [Chapter 4: Developing a Business/Site Inspection Program](#)). Inspectors that focus on stormwater BMP/facility maintenance can provide information about stormwater BMP/facility maintenance requirements. Local PPA inspectors can provide information regarding source control BMPs related to hazardous materials storage and disposal, Universal waste storage and disposal, materials labelling, spill response plans, and spill kits.

Understanding inspection program goals is key for new inspectors. The program manager and inspection program SOP should clearly identify the inspection program goals for meeting the NPDES Municipal Stormwater Permit requirements, understand the program's focus on an education and technical assistance, and identify progressive enforcement options that are available to bring deficiencies into compliance when appropriate. Implementation of source control BMPs may be a new concept for most businesses/sites and patience during the inspection and follow-up process will help to generate support for inspectors and the inspection program and ultimately the jurisdiction implementing the program.

5.4. INSPECTION PROCESS

The inspection process is separated into three phases:

1. Pre-inspection activities (investigation and data gathering)
2. Business/site inspection and documentation
3. Follow-up activities

Figure 5.1 provides an overview of the process with suggested activities for each phase.

Pre-Inspection Activities

- Determine if an appointment is needed
- Verify business/site contact information
- Research and understand the business type and potential pollutant generating sources
- Determine if the site has an existing stormwater or water quality permit
- Review records from previous inspections
- Research the water quality complaint history
- Review the onsite drainage as-builts
- Review information about potential source control BMPs
- Prepare inspection form



Business/Site Inspection and Documentation

- Introduction and explanation of inspection purpose
- Identify the appropriate business/site contact
- Conduct the site walk-through
- Document inspection
- Verify contact information
- Close the inspection



Follow-Up Activities

- Enter or verify the business/site inspection information in the data management system
- Summary communication of inspection results
- Generate business/site letter/e-mail documenting deficiencies (if needed)
- Enter appointment reminders for conducting follow-up inspections (if needed)
- Begin the process for immediate enforcement (if required)



See Figure 2.1 in Chapter 2 for an example enforcement workflow

Figure 5.1. Business/Site Source Control Inspection Process.

5.4.1. Pre-Inspection Activities

Prior to conducting the business/site inspection, the following activities are recommended:

- **Determine if an appointment is needed** for the inspection. Many inspection programs conduct unannounced site visits in order to observe the business/site under normal operating conditions; however, some businesses/sites (i.e., large sites such as lumber or salvage yards, sites with heavy/moderate industrial processes, or time-sensitive offices with customer appointments such as veterinary or medical offices) may require an appointment.
- **Verify business/site contact information** including name, address, parcel number, phone number, and e-mail address. For unknown contacts or unannounced inspections, this information can be collected during the inspection as part of initial interactions at the business/site.
- **Research and understand the business type and potential pollutant-generating sources** at the site. North American Industry Classification System (NAICS) and corresponding Standard Industrial Classification (SIC) codes are discussed in detail in [Chapter 3: Source Control Inventory Development, Updates, and Prioritization](#). Reviewing this information will be helpful for the next step to identify potential activities and source control BMPs to look for during a site inspection. Consider a web search for the business prior to the inspection to learn more about the business and their offered services if a business website is available. Being familiar with the online presence of a specific business may improve inspector relatability during initial interactions at the inspection.
- **Determine if the site has an existing stormwater or water quality permit**, such as an Industrial Stormwater General Permit (ISGP) or Industrial Stormwater Individual Permit (IP). Check the [Water Quality Permitting and Reporting System \(PARIS\) database](#). Review the permit information and determine if a joint site visit with Ecology would be beneficial.
- **Review records from previous inspections** if applicable for the business/site. Consider reaching out to the PPA program; Fats, Oils, and Grease (FOG) program; Ecology; and/or private stormwater BMP/facility maintenance inspection group.
- **Research the water quality complaint history** (e.g., calls to the local jurisdiction illicit discharge hotline and reports from field staff) and review applicable report(s).
- **Review the onsite drainage as-built** drawing if available and print or save a digital copy to bring to the inspection. Determine if traffic control is needed to inspect the storm drainage system (if that will be part of your inspection process). Review the maintenance standards for the type of stormwater BMPs/facilities, if known, that you will encounter at the site. The private stormwater BMP/facility maintenance inspection group or storm

drainage system maintenance group may have a stormwater BMP/facility maintenance form that can be used during site inspections. See the Chapter 7 SCORL for example checklists for stormwater BMP/facility maintenance. Maintenance standards can be found in the following manuals:

- [Appendix V-A in Volume V of the 2019 Stormwater Management Manual for Western Washington \(SWMMWW\)](#)
- Functionally equivalent manuals approved by Ecology (confirm applicability with [Ecology's equivalent stormwater manuals for municipal stormwater permits web page](#))
 - [Appendix A of the King County Surface Water Design Manual](#)
 - [Appendix G of the Seattle Stormwater Manual](#)
 - [Volume 4, Appendix C of the Tacoma Stormwater Management Manual](#)
 - [Appendix I-A of the Pierce County Stormwater Management Manual and Site Development Manual](#)
 - [Book 4 of the Clark County Stormwater Manual](#)
 - [Volume VI of the Snohomish County Drainage Manual](#)
 - [Section 5-5 of the Washington State Department of Transportation Highway Runoff Manual](#)
- Phase II jurisdictions may also have developed maintenance standard checklists based on the 2019 SWMMWW or a functionally equivalent manual
- **Review information about potential source control BMPs** that may be encountered based upon the business type specific for the potential pollutant generating sources at the site.
 - Prepare a hard copy binder with source control BMP requirements from the 2019 SWMMWW or functionally equivalent manual, BMP fact sheets, and/or other educational materials that clearly convey source control BMP requirements. The binder does not need to be comprehensive, but having this information prepared for common source control BMPs may be helpful. Alternatively, download digital copies of the 2019 SWMMWW or functionally equivalent manual and applicable BMPs to a mobile device. Relevant PDF pages can be e-mailed to the business/site contact as needed.

- Source control BMP requirements can be found in the following manuals:
 - [Volume IV of the 2019 SWMMWW](#)
 - Functionally equivalent manuals approved by Ecology (confirm applicability with [Ecology's equivalent stormwater manuals for municipal stormwater permits web page](#))
 - ◆ [King County Stormwater Pollution Prevention Manual](#)
 - ◆ [Volume 4 of the Seattle Stormwater Manual](#)
 - ◆ [Volume 3 of the Tacoma Stormwater Management Manual](#)
 - ◆ [Volume IV of the Pierce County Stormwater Management Manual and Site Development Manual](#)
 - ◆ [Book 3 of the Clark County Stormwater Manual](#)
 - ◆ [Volume IV of the Snohomish County Drainage Manual](#)
- Common source control BMPs can be formatted as a fact sheet or post card with photos and resources. Contractor lists can also be a helpful resource to provide to the owner/site manager if storm drainage system maintenance is needed. See [Chapter 7: Education and Outreach Materials](#) for examples.
- **Prepare inspection form.** Most programs use inspection forms for documentation. Inspection forms may be formatted by listing the potential pollution generating activity first and then listing applicable source control BMPs, or may be formatted as a series of questions to help guide the inspection. The inspection form may be generic (e.g., used for all business types) or tailored to a specific business sector. The inspection form will provide prompts for an inspection to ensure that potential pollutant-generating sources are not missed.

The example inspection form provided as [SCORL Supplemental Resource 5A](#) can be modified to match a jurisdiction-specific process or specific business types. Recommended inspection form elements are summarized in Table 5.2. Additional inspection form examples are included as [SCORL Supplemental Resources 5B, 5C, 5D, and 5E](#). Note that the inspection form is intended as a documentation tool; not all items on the inspection form will be relevant to every business/site. The inspector's most important role is to observe and ask relevant questions targeting potential issues at the business/site, regardless of whether these items fit into the structure of the inspection form.

Item	Purpose
Contact information	<ul style="list-style-type: none"> • Confirm the business/site name and address • Identify business/site contact name and position title (owner/site manager) • Verify contact e-mail and phone number • Determine the preferred method of communication
Date and inspectors	<ul style="list-style-type: none"> • Identify when the inspection was conducted • Identify who performed the inspection
Type of business	<ul style="list-style-type: none"> • Identify NAICS code (and SIC code if available) • Note if hazardous waste generator • Note if ISGP or IP
Type of inspection	Identify the key reason for the inspection (initial, follow-up, complaint)
Areas that will be inspected	Guide the inspector through the visit
Note baseline conditions (optional)	Record observations/actions (e.g., measurement of catch basin sediment levels) that inform baseline conditions at the business/site
Note deficiencies	<ul style="list-style-type: none"> • Document deficiencies to identify source control BMPs and follow-up actions needed • Include sensory observations (e.g., sight, touch, smell, hearing) that may fall outside specific BMP deficiencies (e.g., smell of solvent in a dumpster)
Note areas in compliance	Provide positive feedback to the owner/site manager to establish a collaborative approach to compliance
List outreach materials provided	<ul style="list-style-type: none"> • Document materials provided (e.g., fact sheets, post cards, contractor list for stormwater system maintenance) • Confirm if follow-up materials are needed
Document compliance	<ul style="list-style-type: none"> • Summarize the visit and compliance status • Inform follow-up activities (e.g., follow-up inspection, correspondence)
Document required actions	<ul style="list-style-type: none"> • Guide inspection closeout • Identify actions that are needed to achieve compliance (if required)
Document technical assistance offered and accepted to improve compliance	Identify technical assistance during the inspection

IP = Industrial Stormwater Individual Permit

ISGP = Industrial Stormwater General Permit

NAICS = North American Industry Classification System

5.4.2. Conducting the Inspection

Some recommended steps for conducting business/site inspections include:

- **Introduction and explanation of inspection purpose:**
 - Request to speak with the owner/site manager. Your business card is a good start for the owner/site manager to understand why you are there and the purpose of the inspection.

- Introduce the program, explain the inspection process (e.g., walk-through, document review, note observations/ possible deficiencies) and benefits of the inspection (e.g., inspecting catch basins can help evaluate maintenance needs and prevent flooding), discuss the time commitment needed, and ask permission to take photos. Explain that the goal is clean water downstream that starts with clean stormwater runoff from the site/business. Consider naming the local creek, river, bay, lake, or Puget Sound that the business/site runoff impacts in order to help the owner/site manager understand their contribution to local waterways. This is an opportunity to build rapport, establish common ground, and show interest in learning about the business/site.
- **Identify the appropriate business/site contact.** The inspection can be performed without the owner/site manager if a facilities manager, environmental manager, or other appropriate staff has more time available to dedicate to the inspection process. However, caution should be exercised prior to involving any non-leadership staff that may not have sufficient authority to convey or implement action items or educational messaging. Non-leadership staff could also experience uncertainty or bear professional risk for interacting with an inspector. The inspection and follow-up will be more efficient if the appropriate personnel is present.
- **Conduct the site walk-through.** The goal of the inspection is to determine compliance and deficiencies with source control requirements, but the inspection can also serve as a learning experience for the owner/site manager.
 - Recommended inspection approaches include:
 - Ask questions about the business processes as each area is inspected to learn how the activity is managed. Using this approach involves and engages the owner/site manager in the inspection process and increases opportunities for source control BMP education. As an active participant in the inspection, the owner/site manager may better understand the connection between the storm drainage system, the business/site activities, and the overall goal to prevent pollutants from entering the storm drainage system and local waterways.

or

 - Ask the owner/site manager to walk through the business/site the same way that products and services would (if appropriate for that business type), noting operational and structural issues along the way.
- Recommended areas to inspect during a source control (business/site) inspection include:
 - Outdoor storage areas (including stockpiles and dumpsters)

- Fueling areas, vehicle/equipment washing areas, and vehicle/equipment maintenance areas
- Activities that are unique to the site that may generate pollutants (e.g., loading/unloading areas, dock washing, other maintenance activities)
- Indoor maintenance and storage areas
 - ◆ Can materials from indoor bays drain outside or is a berm or other interior drains present?
 - ◆ Confirm connections for interior floor drains (if present) using as-built drawings or dye testing
- Spill kits and other spill response materials, posted spill plan
- Storm drainage system and stormwater management BMPs/facilities at the site including conveyance and on-site stormwater management, flow control, and runoff treatment BMPs/facilities.
 - ◆ *Optional:* pulling catch basin/manhole lids and/or inspecting detention vaults/tanks to measure/observe potential pollutants, debris, and sediment accumulation.

Table 5.3. Inspection by Area/Activity and Common Source Control BMPs.

Area or Activity ^a	Common Source Control BMPs ^b
Outdoor storage areas	<ul style="list-style-type: none"> ● Raw materials, by-products, and finished products are covered ● Raw materials, by-products, and finished products are located away from storm drains ● Chemicals, drums, and bagged materials are stored off the ground ● Drip pans or containers are used where leaks could occur ● Storage areas are designed to prevent stormwater runoff or run-on
Waste handling and disposal	<ul style="list-style-type: none"> ● Waste dumpsters are closed and not leaking ● Grease containers are closed, not leaking, no drips or spills on the ground ● Mats and racks are cleaned in locations that are not directed to the storm drainage system
Hazardous wastes	<ul style="list-style-type: none"> ● Materials are labeled, covered, and stored in secondary containment ● Secondary containment is free from spills and water exposure ● Waste disposal records are kept up to date^c ● Universal waste is properly stored and disposed^c
Fueling areas	<ul style="list-style-type: none"> ● Fueling areas are covered and on a concrete surface ● Fueling areas have no stormwater runoff or run-on ● Spill response kit(s) are readily accessible ● Aboveground tanks are double-walled or have secondary containment

Table 5.3 (continued). Inspection by Area/Activity and Common Source Control BMPs.	
Area or Activity^a	Common Source Control BMPs^b
Equipment and vehicle washing and repair	<ul style="list-style-type: none"> ● Vehicles are washed at a designated wash rack area with disposal to the sanitary sewer system (properly constructed and permitted, if required), washwater is collected and disposed properly, or vehicles are washed off-site at a professional wash facility that discharges to the sanitary sewer system ● Non-operational vehicles and equipment are drained of fluids and/or drips are controlled
Loading/unloading areas	<ul style="list-style-type: none"> ● Areas are managed to reduce exposure to rain ● Storm drains are covered during material transfer
Outdoor work activities	<ul style="list-style-type: none"> ● Track out of materials is controlled ● Work is conducted within contained or covered areas as necessary
Spill plan	<ul style="list-style-type: none"> ● Spill plan is posted in a visible area and employees are aware of location
Spill kit	<ul style="list-style-type: none"> ● Spill kit(s) are properly stocked ● Spill kit location(s) are marked on a map contained in the spill plan
Building exterior and grounds	<ul style="list-style-type: none"> ● Dry methods are used to clear litter and debris ● Pressure washing water is collected and disposed properly ● Parking and driveway areas are relatively free of staining ● The site is free of litter and debris
Storm drainage systems	<ul style="list-style-type: none"> ● Catch basins, on-site stormwater management/flow control/runoff treatment BMPs/facilities are maintained according to standards ● Catch basins/manholes are labeled
Illicit connections	<ul style="list-style-type: none"> ● Indoor drains are connected to the sanitary sewer system or an on-site septic system

^a Scope of inspection should include areas with potential connection to stormwater impacts, typically outdoors.

^b Common source control BMPs are listed here for convenience. Refer to the Stormwater Management Manual for Western Washington (SWMMWW) or functionally equivalent manuals approved by Ecology for additional detail.

^c Note that source control regulations may not have jurisdiction over waste disposal.

- **Document inspection:**

- Fill out a standard inspection form (electronic or hard copy) and take notes to document what was observed and source control BMPs that are needed.
- Take photographs to document deficiencies related to source control BMPs. Also take photographs of good source control practices that can be used as an example for similar businesses/sites and for ongoing training purposes. Request permission before taking photos on private property.

- **Verify contact information.** Determine who the best person is to contact at the business/site for corrections/responsibility and future communications. Verify property ownership, physical and mailing address, phone number, and e-mail address. E-mail and mail are the most likely forms of communication if follow-up actions and/or site inspections are required.

- **Close the inspection.** Summarize the inspection results verbally with the owner/site manager, including describing any source control BMPs that are needed and those that are properly in place and working. Provide a timeline for when follow-up should be expected and provide any relevant outreach materials and/or technical assistance:
 - Provide initial recommendations verbally regarding source control BMPs to address deficiencies.
 - Establish a timeline for the owner/site manager to implement source control BMPs and describe the process and timeline for compliance. Inform the owner/site manager of the follow-up process (e.g., should they anticipate an e-mail, a letter, or a follow-up inspection?).
 - Leave hard copies or send e-mail attachments of technical assistance materials, which may include:
 - Storm drainage system as-built or record drawings
 - Example spill plan template
 - Contractor list for storm drainage system cleaning
 - Contractor list for vent/hood or grease interceptor cleaning (FOG)
 - Contractor list for on-site septic system maintenance
 - Information on labeling/marketing storm drains
 - Relevant outreach materials that can be posted in the workspace for employee education

5.4.3. Follow-Up Activities

Upon returning to the office, the inspector should enter or verify the business/site inspection information in the data management system (see [Chapter 6: Data Management and Recordkeeping](#)). If action items were identified during the inspection, follow-up is critical to ensure that these items have been addressed and all issues are resolved. The data management system can be configured to assist with tracking action item status and overall compliance of a particular business/site.

- **Correspondence:** The inspection outcome will inform follow-up activities based on established processes unique to each jurisdiction. Examples workflows for the inspection, re-inspection, and enforcement process are provided in [Chapter 2: Developing Source Control Codes/Ordinances and Enforcement Policies](#). Typically, the inspector will generate a business/site letter or e-mail documenting compliance or deficiencies and reiterating actions (with timelines) for compliance (if needed). Example business/site letters can be found in [Chapter 4: Developing a Business/Site Inspection Program](#).

Prior to sending correspondence, inspectors should consider whether involving other agencies, providing additional technical assistance, or obtaining additional permission is needed for next steps. Use consistent language to communicate these items to the business/site contact when appropriate:

- Do any observed environmental concerns need to be referred to other agencies for additional technical/financial assistance or for regulatory compliance issues?
- Remind the owner/site manager that you can provide additional technical assistance if needed. Offer to meet with contractors, review bids, or otherwise support compliance efforts.
- Is special permission needed to take samples from storm drainage structures for program purposes, documenting trends, setting baselines, etc.? (Note that there may be formal request forms to document permission to access the property for additional actions like sampling.)

Enter appointment reminders for conducting follow-up inspections (if needed). E-mail correspondence (e.g., a shared photograph of a corrected issue or copy of spill plan) may be sufficient in some cases to confirm that issues have been addressed. Regardless of the approach to follow-up, clear expectations should be communicated for the timeline and actions required. Follow-up activities should also be logged towards the 20 percent inspection requirement in the permit (see [Chapter 3: Source Control Inventory Development, Updates, and Prioritization](#)).

- **Setting timelines:** The NPDES Municipal Stormwater permit does not specify timelines for source control compliance. If an illicit connection is identified, the NPDES Municipal Stormwater permit has established a timeline for compliance (Western Washington 2019-2024 Phase II Permit, S5.C.8.a.i):

(d) "Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated."

Otherwise, timelines may vary based on each jurisdiction's established procedures. For issues that will require expensive or labor-intensive modifications, a conversation with the business/site contact is recommended to determine a feasible timeline to accomplish the task, allowing for reasonable negotiation and joint decision-making. For minor corrections, 30 days is commonly used as a starting point for scheduling a follow-up, to be adjusted based on specific circumstances at the site.

Enforcement: If required, begin the process for immediate enforcement as determined in the inspection program SOP or enforcement policy. For more details on enforcement procedures, see [Chapter 2: Developing Source Control Codes/Ordinances and Enforcement Policies](#).

