

CHAPTER 7: EDUCATION AND OUTREACH MATERIALS

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

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Note:

Some pages in this document have been purposely skipped or blank pages inserted so that this document will print correctly when duplexed.

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7. EDUCATION AND OUTREACH MATERIALS

This chapter summarizes the elements of a basic communication plan related to source control inspections, provides recommendations for cross-jurisdictional collaboration for materials, includes links to example education and outreach materials. Supplemental resources to support this chapter can be found in the [Source Control Online Resource Library \(SCORL\) for Chapter 7](#).

7.1. PERMIT REQUIREMENTS

The National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater permit specifies outreach to all businesses/sites included in the source control inventory and specifies outreach delivery methods and frequency (Western Washington 2019-2024 Phase II Permit, S5.C.8.b.iii(a)):

“All identified sites with a business address shall be provided information about activities that may generate pollutants and the source control requirements applicable to those activities. This information shall be provided by mail, telephone, electronic communications, or in person. This information may be provided all at one time or spread out over the permit term to allow for tailoring and distribution of the information during site inspections.”

The NPDES Municipal Stormwater permit also specifies communication when a site has failed to implement required best management practices (BMPs), usually during a routine site inspection or complaint visit (Western Washington 2019-2024 Phase II Permit, S5.C.8.b.iv.(a)).

No later than January 1, 2023, each Permittee shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as specified below:

- (a) *“If the Permittee determines, through inspections or otherwise, that a site has failed to adequately implement required BMPs, the Permittee shall take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections.*
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7.2. COMMUNICATION PLAN

Recommended elements of a communication plan include available types of education or outreach materials, delivery methods and timing, technical assistance methods, and provisions for multiple language needs.

7.2.1. Types of Materials

Many outreach materials are designed utilizing graphics and photos to effectively communicate proper implementation of source control BMPs. Printed outreach materials are produced in a variety of sizes, colors, and types of paper including:

Size	Color Preferred or Optional?	Recommended Type of Paper
Letter sized sheet	Optional	Standard printer paper
Postcard	Color preferred	Sturdy glossy thick paper
Fact card	Color preferred	Cardstock
Booklet/brochure/pamphlet	Color preferred	Standard printer paper or cardstock
Wall/bulletin board poster	Color preferred	Laminated poster

Electronic materials are also commonly used. Choosing between print or electronic materials should be based on the target audience for the outreach message. Regardless of whether materials are printed or electronic, design (e.g., colors, layout, font size, etc.) should be based on accessibility standards. For creation of new outreach materials, it is also recommended to utilize the jurisdiction or agency's local style guide to maintain consistency for public communications.

7.2.2. Delivery Methods and Timing

Jurisdictions are required to distribute information to meet NPDES Municipal Stormwater permit requirements regarding activities that may generate pollutants and the source control requirements applicable to those activities. Each delivery method (i.e., mail, telephone, electronic communications, or in person) identified in the NPDES Municipal Stormwater permit presents advantages or disadvantages that vary based on the scenario or audience. For example, the following applies to mailing versus hand-delivery of printed materials:

Advantages	Disadvantages
If conducting a windshield survey during source control inventory development or if hand delivering information to a targeted business sector (e.g., auto shops) then the correct address, e-mail, business phone number, and preferred communication method could be confirmed.	Traditional mail can be ineffective if delivered to corporate headquarters rather than the local owner/site manager.

Costs of various delivery methods and staff resources required to implement should also be compared when selecting the preferred approach.

Most programs conduct site inspections without appointments but if an appointment is necessary for a site inspection, a phone call or in person request to the business/site is the most effective option.

During the site inspection, verbal communication combined with written materials (including diagrams or photographs) can be highly effective when communicating BMP deficiencies (see [Chapter 5: Conducting Business/Site Inspections](#)).

Enforcement letters specifying required actions will likely need to be delivered by registered mail, whereas other communications (e.g., confirmation that a business/site has achieved compliance, follow-up coordination regarding action items, sharing technical assistance, etc.) following the initial site inspection can be delivered by e-mail with supplemental content provided through weblinks. Methods of delivery will vary depending on what is allowable within each jurisdiction.

Ongoing outreach, outside of site inspections and follow up inspections, can be expensive and time intensive. Some jurisdictions have developed content to post to their jurisdiction's website to educate and provide technical assistance related to source control BMPs. Methods to drive the target audience to the relevant content on the jurisdiction's website should be considered in the communication plan.

Table 7.1 summarizes various stages in the site inspection process and recommended options for communication and timing.

Table 7.1. Source Control Inspection Program Communication Recommendations.		
Messaging Purpose	Options to Deliver Messaging	When to Deliver Messaging
Notify businesses/sites on the source control inventory about the source control inspection program	<ul style="list-style-type: none"> ● Mail or e-mail ● Hand deliver/in person ● Jurisdiction website ● Social media ● Article in local media, trade publications, or local chamber of commerce publication 	Prior to source control inspection program implementation
PERMIT REQUIRED: General and site-specific BMP information to all businesses/sites on the source control inventory	<ul style="list-style-type: none"> ● Mail or e-mail ● Hand deliver/in person ● Jurisdiction website ● Social media ● Workshops 	PERMIT REQUIRED: Prior to the end of the Western Washington Phase II Permit term (July 31, 2024)
Notify businesses/sites of site inspections	<ul style="list-style-type: none"> ● Mail or e-mail ● Hand deliver/in person 	2 to 3 weeks prior to site inspection
Request appointment for site inspection (if needed)	<ul style="list-style-type: none"> ● Phone call ● Mail or e-mail ● Hand deliver/in person 	1 to 2 weeks prior to site inspection

Table 7.1 (continued). Source Control Inspection Program Communication Recommendations.		
Messaging Purpose	Options to Deliver Messaging	When to Deliver Messaging
Summarize site inspection deficiencies	<ul style="list-style-type: none"> ● Mail or e-mail ● Hand deliver/in person 	Immediately, during the site inspection, and within 1 week following the site inspection
PERMIT REQUIRED: Clarify specific deficiency follow-up actions	<ul style="list-style-type: none"> ● Mail or e-mail ● Hand deliver/in person 	Immediately, during the site inspection, and within 1 week following the site inspection
PERMIT REQUIRED: Immediate enforcement of a high priority issue (i.e., illicit connection or illicit discharge)	<ul style="list-style-type: none"> ● Registered mail AND e-mail ● Hand deliver/in person 	Immediately and 1 to 2 days following site inspection
Post-inspection summary	<ul style="list-style-type: none"> ● Mail or e-mail 	1 to 2 weeks following site inspection
Ongoing business education and outreach	<ul style="list-style-type: none"> ● Mail or e-mail ● Jurisdiction website ● Social media 	Ongoing throughout source control inspection program implementation

7.2.3. Technical Assistance

The site inspection is an opportunity to provide additional education and technical assistance beyond specific BMP deficiencies and actions needed. Some of the technical assistance materials identified in [Chapter 5: Conducting Business/Site Inspections](#) that can be provided as education and outreach materials 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 (Fats, Oils, and Grease [FOG])
- Contractor list for on-site septic system maintenance
- Information on labeling/marking storm drains
- Relevant outreach materials that can be posted in the workspace for employee education

7.2.4. Multi-Lingual Communication Recommendations

When conducting site inspections, inspectors may encounter owners/site managers whose primary language is not English. Since communication is a key aspect of the source control inspection program, it is important that inspector's communication, outreach materials, and letters are clear and culturally appropriate. If communication is challenging and progress is impeded during the site inspection and/or follow-up, and if the source control inspection program expects to encounter this communication barrier in the future, consider:

- Learning cultural appropriate norms ahead of the site inspection
- Working to pronounce names correctly, as a sign of respect
- Slowing down speech
- Using hands and gestures when speaking
- Limiting vocabulary by using simple phrases, and avoiding slang and acronyms
- Enunciating clearly and using voice intonation
- Providing pictures as examples
- Being patient
- "Fee for translator" service contract
- Using translation mobile applications in the field for non-technical communication

Examples of outreach materials including BMP activity sheets and educational materials have already been developed through similar programs (e.g., PPA, Phase I programs, ongoing source control programs in other states, etc.) in other languages for commonly encountered scenarios, which vary by business sector and geographic area. Available outreach materials in other languages are included as [SCORL Supplemental Resources](#). For situations not covered by existing resources, materials or communications may need to be translated for a specific owner/site manager if the BMP deficiencies are complicated or not well understood.

7.3. CROSS-JURISDICTION COLLABORATION

Jurisdictions have access to a wide range of outreach and education materials developed by individual jurisdictions or from group projects. Several municipal stormwater groups meet quarterly or more frequently and share resources. Some jurisdictions have collaborated by interviewing target business sectors and publishing reports. These focus group reports may provide valuable insights. The reports summarize interviews with owners, site managers, and employees about preferred delivery methods of communication, material format, employee educational materials, and messaging that resonates with their business environment.

Cross-jurisdiction collaboration groups include:

- [Stormwater Coordinator Groups](#): Western and Eastern Washington municipalities have developed groups that meet quarterly or more frequently. Consider subscribing to their meeting lists for notification of meeting agendas for opportunities to listen, learn, and participate on the topics related to source control.
 - Central NPDES Coordinators Forum
 - Eastern Washington Municipal Stormwater Group
 - North Sound Coordinators Forum
 - South Sound Phase II Coordinators Group
 - Southwest Washington Coordinators Forum
 - Wenatchee Valley Stormwater Technical Advisory Committee
 - West Sound Stormwater Manager’s Coordination Group
- [Business Inspection Group \(BIG\)](#): BIG is a regional business inspection group that meets to share information and collaborate on topics surrounding source control business inspections and the new permit requirements. Members include Phase I jurisdictions with ongoing permit-required business source control programs and Phase II jurisdictions sharing information as they develop their new permit-required programs.
- [Stormwater Outreach for Regional Municipalities \(STORM\)](#): STORM is a coalition of 81 Western Washington jurisdictions that work together to create effective, regionally consistent, and cost-efficient education and outreach programs and messaging. STORM services help jurisdictions meet their NPDES Municipal Stormwater Permit requirements and provide professional development opportunities to staff. Outreach materials are available on the [STORM Public Library webpage](#).

7.4. SOURCE CONTROL BMP GUIDANCE

Businesses/sites are required to implement source control BMPs for pollution generating sources. Source control BMP requirements can be found in the Stormwater Management Manual for Western Washington (SWMMWW) or functionally equivalent manuals approved by Ecology. Most of this source control BMP guidance was written to be pulled out of a full source control volume (covering multiple business/site activities) to provide directly to businesses/sites (for their site-specific activities) for implementation. Note: Functionally equivalent manuals may contain jurisdiction specific references such as code references, phone numbers, and weblinks.

Source control BMP requirements can be found in the following manuals:

- [Volume IV of the 2019 SWMMWW](#) : Volume IV is the foundation for source control BMP requirements. This volume includes source control BMPs applicable to all sites (IV-1 through IV-7), pollutant generating sources of various land uses (IV-A), and management of street wastes (IV-B). The volume includes an active table of contents prior to each BMP grouping to assist with navigation.
- 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](#): The manual is organized by property type (e.g., commercial, multi-family and residential). Activity and information sheet titles are listed on one web page with separate weblinks for each.
 - [Volume 4 of the Seattle Stormwater Manual](#): The manual includes a worksheet in checklist format for a user (owner/site manager) to self-identify activities and associated BMPs. Many BMPs include photos or diagrams. The volume includes an active table of contents to assist with navigation.
 - [Volume 3 of the Tacoma Stormwater Management Manual](#): The volume includes an active table of contents to assist with navigation.
 - [Volume IV of the Pierce County Stormwater Management Manual and Site Development Manual](#): This volume includes a worksheet for commercial and industrial activities. The volume does not include an active table of contents.
 - [Book 3 of the Clark County Stormwater Manual](#): Appendix 3-C summarizes recycling and disposal of vehicle fluids and other wastes. The book includes an active table of contents to assist with navigation.
 - [Volume IV of the Snohomish County Drainage Manual](#): The volume includes an active table of contents to assist with navigation.

7.5 BUSINESS OUTREACH MATERIALS

In addition to the source control BMP sections from the SWMMWW or other functionally equivalent manuals, outreach materials have been designed and produced by existing programs, Phase I jurisdictions, Phase II jurisdictions, the PPA, and others. Outreach materials are designed to simplify implementation of source control BMPs by using plain talk to be more understandable and less technical than the source control BMP information included in a stormwater manual while remaining accurate. For this manual, business outreach materials have been collected, reviewed, categorized, and organized by general information (all sectors) or specific business sectors.

Some outreach materials were developed based upon interviews with the business sector and audience. Specifically, "Only Rain Down the Drain," Dump Smart, Auto Shop 4C's poster, and the "We Do It Right" restaurant poster.

Education and outreach materials developed for this project will be available by November 2022 as [SCORL Supplemental Resource 7A](#).

General information for all sectors developed by others and available as [SCORL Supplemental Resources 7B through 7F](#) include:

General Information for All Business Sectors	Type(s)	Languages
Dumpsters	Press release, fact card, brochure, flyer, rack card	English, Spanish ^a , Russian ^a
General information	Booklet, brochure, flyer, poster, website	English, Spanish ^a
Spills	Plan, poster, rack card, website	English, Spanish ^a , Russian ^a
Storm drainage system maintenance	Flyer, website	English
Washwater	Brochure, flyer, poster, rack card	English, Spanish ^a , Russian ^a

^a Limited materials have been translated/transcreated into this language.

Specific business sector information developed by others and available as [SCORL Supplemental Resources 7G through 7S](#) include:

Business Sectors	Type(s)	Languages
Automotive	Brochure, flyer, poster	English, Khmer ^a , Korean ^a , Russian ^a , Spanish ^a , Vietnamese ^a
Carpet cleaner	Booklet, brochure, flyer, rack card	English
Construction	Poster	English
Gas station	Brochure, flyer	English
Landscaping	Booklet, brochure, flyer, rack card	English

Business Sectors	Type(s)	Languages
Mobile business	Brochure, flyer, rack card	English
Multi-family residential	Flyer	English
Painters	Rack card	English
Pet care	Flyer	English
Pools and spas	Brochure	English
Pressure washers	Booklet, rack card, website	English
Restaurant and food service	Brochure, flyer, letter, poster, sticker	English, Spanish ^a , Multilingual (yes/no only) ^a
Special events	Flyer	English

^a Limited materials have been translated/transcreated into this language.

