Developing and Refining Source Control
Inspection Programs for Businesses

Proposal May 15, 2020

Proposal Partners
Developing and Refining Source Control Inspection Programs for Businesses

PROJECT PURPOSE

Develop a source control program guidance manual and trainings to assist western Washington Phase II permittees implement new business inspection source control programs that comply with 2019-2024 NPDES Municipal Stormwater Permit requirements (S5.C.8). Materials and training information will be based on best management practices and lessons learned from existing Phase I and Phase II jurisdictions business inspection programs.

PROJECT DESCRIPTION

The Business Inspection Group (BIG) recently completed a Business Inspection Program Report. The report compiles information gathered via a comprehensive survey developed and reviewed by regional technical experts from the BIG membership. This report will be used as the basis to build the guidance manual and determine training to meet permit requirements. The project scope includes but is not limited to the following objectives:

- Convene a Technical Advisory Committee (TAC) comprised of municipal source control technical experts from across western Washington jurisdictions.
- Identify information gaps in the BIG Business Inspection Program Report collect information pertaining to gaps and include in guidance manual
- Develop Source Control Guidance Manual with adaptable templates for use by jurisdictions. Guidance manual sections and templates will be completed in sections in accordance with permit requirements and due dates
- Identify jurisdictions not previously interviewed for BIG report implement source control business inspection programs. Implement data request from these permittees via survey and interviews and include information in guidance manual
- Develop and implement four trainings/workshops
- Trainings/workshops will be recorded to create training videos for use by jurisdictions
- Develop plan for communicating study findings and making available project deliverables to jurisdictions throughout Western Washington.

This project provides deliverables that include detailed information about current Phase I and Phase II programs, providing examples and best practices essential to meeting the business inspection source control requirements of the permit.

Municipal source control programs throughout Western Washington will have a regional resource. Providing single reference guide and consistent training for staff implementing source control programs and inspection activities. Regional long term benefits include at a minimum:

- Improved Water quality
- Raises pollution prevention awareness for businesses
- Implementation of basic BMPs
- Provides tools to assist permittees in meeting permit obligations
- Consistency of regional inspections and programs level playing field for businesses
- Assists smaller jurisdictions with limited capacity and resources to implement business programs
Developing and Refining Source Control Inspection Programs for Businesses

SCOPE OF WORK

TASK 1. Project Management
Washington Stormwater Center (WSC)/Washington State University (WSU) will manage all work related to administration, coordination and financial activities associated with the projects tasks. Project management shall include the following tasks not identified as deliverables:

- Develop RFP for consultant(s) to assist with tasks 2, 3, 4. WSC will work with the planning team to develop and execute the call for proposals, publicize RFP, short list interviews, execute contact.
- Recruit TAC members and coordinate with the Project Team and TAC to schedule meetings, develop a project communications plan and timeline for project deliverables.
- WSC submits all reports and deliverables per task completion schedule.
- Submit close out report and deliverables.

<table>
<thead>
<tr>
<th>Task 1 Deliverables</th>
<th>Target Deadline</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Quarterly Reporting</td>
<td>15 day of month after quarter end</td>
<td>$8,500</td>
</tr>
<tr>
<td>1.2 Presentation to SWG</td>
<td>Nov. 2021</td>
<td>$2,500</td>
</tr>
<tr>
<td>1.3 Summary of Findings/Fact Sheet</td>
<td>Jan. 2023</td>
<td>$2,000</td>
</tr>
<tr>
<td>1.4 Close out Report and Deliverables</td>
<td>Jan. 2023</td>
<td>$4,088</td>
</tr>
<tr>
<td>Task 1 Total</td>
<td></td>
<td>$17,088</td>
</tr>
</tbody>
</table>

TASK 2. Information Search
The information gathered in this task will inform the guidance manual content in addition to information already compiled in the BIG report. Since the completion of the BIG report, other Phase II jurisdiction with source control programs have been identified that weren’t surveyed for the original report. Those jurisdictions will be asked to complete the BIG report survey questions and interviews. An information search will be conducted to identify resources available through organizations addressing pollution prevention such as: health departments, ECOSS, etc.

Operations to fulfill this task are as follows:
2.1 Gather information on 3-4 existing municipal source control programs by interviewing municipal source control program managers and staff responsible for implementing different aspects of their programs.
2.2 TAC will review BIG report and related documents to ensure the source control guidance manual is complete, accurate and user friendly in informing jurisdictions striving to meet the Phase II permit requirements. TAC will help identify any gaps or additional information needed to inform a Phase II Permit compliant program.
Developing and Refining Source Control Inspection Programs for Businesses

2.3 Identify resources available from agencies and pollution prevention organizations to develop a directory of on-line education and outreach materials (i.e. ECOSS, Health dept., etc.)

**Task 2 Deliverables**

<table>
<thead>
<tr>
<th>Deliverable</th>
<th>Target Deadline</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Summary of municipal program interview</td>
<td>May 2021</td>
<td>$14,000</td>
</tr>
<tr>
<td>2.2 BIG Report review summary of findings</td>
<td>May 2021</td>
<td>$14,000</td>
</tr>
<tr>
<td>2.3 List of agencies with on-line resources</td>
<td>March 2021</td>
<td>$8,327</td>
</tr>
<tr>
<td><strong>Task 2 total</strong></td>
<td></td>
<td><strong>$36,327</strong></td>
</tr>
</tbody>
</table>

**Task 3 Guidance Manual**

Guidance Manual shall include but not be limited to a list of elements specific to Phase II permit S5.C.8: code/ordinances, policy/procedures, data management, resource catalog, staffing, BMPs, and Appendix 8. The manual content shall include sample inspection forms and checklist and education and outreach materials to assist Phase II jurisdictions in development and implementation of a business inspection and source control program. The manual sections may include but not be limited to:

- Guidance manual (in electronic version housed on the WSC website) shall include the following subjects and additional documentation:
  - Legal Authority
    - Sample ordinance language requiring the application of operational or structural source control BMPs
    - List of equivalent BMP manuals in Western Washington
  - Inventory Development
  - Staffing
  - Inspection, pre-inspection and post-inspection procedures
    - Sample inspection forms and sector checklists
  - Data Management
    - Data management best practices
    - Annual report guidance
  - Enforcement
    - Sample enforcement language and documents
  - Intra and Interagency coordination
  - Other agencies, groups and resources
    - Directory of existing E/O resources

The Communication Plan will be completed as part of Task 3. Training notifications: email, associated regional group meetings, WSC list serve, ECY regional permit coordinators list serve, PPA, etc. WSC will maintain a web page dedicated to providing access to completed guidance manual and training videos and other documents i.e. templates.
Developing and Refining Source Control Inspection Programs for Businesses

Task 3 Deliverables

<table>
<thead>
<tr>
<th>Deliverable</th>
<th>Target Deadline</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 Draft content for review by TAC</td>
<td>July 2021</td>
<td>$20,500</td>
</tr>
<tr>
<td>3.2 Draft manual for review by TAC</td>
<td>Oct 2021</td>
<td>$50,500</td>
</tr>
<tr>
<td>3.3 Updated manual incorporating TAC feedback</td>
<td>Nov 2021</td>
<td>$25,000</td>
</tr>
<tr>
<td>3.4 Final manual, post to WSC website</td>
<td>Feb 2022</td>
<td>$17,039</td>
</tr>
<tr>
<td>3.5 Communication Plan</td>
<td>May 2021</td>
<td>$9,500</td>
</tr>
<tr>
<td><strong>Task 3 Total</strong></td>
<td></td>
<td><strong>$122,539</strong></td>
</tr>
</tbody>
</table>

4. Business Inspection Training

Develop four in-person inspection training/workshops based on the manual. The workshops will focus on how to conduct an efficient and effective inspection. The content will be developed for new inspectors and as a municipal refresher training. The training sessions will be hosted by four jurisdictions in the North, Central, South and West Sound regions of Western Washington. The training will be recorded and edited to create a series of short training videos. Training materials and videos will be posted on WSC website for on-line use by municipal inspection programs for new and refresher training.

Curriculum shall include but not limited to:

- Site Visits / Inspections How and Why
  - Safety
  - Getting in the Door
  - Conveying the message effectively to diverse audiences
  - What to look for and document basic - BMPs
  - Common stormwater source control issues and recommendations for correction
  - Benefit and Challenges to using handout
  - Spill kits, spill plans and cleanup (spill kit demo)
  - Follow-up – visits, letters, enforcement
- Checklists and inspection forms
- Catch Basins and conveyance systems –what to look for
- Other Waste Streams encountered (topical)
  - On-site Sewage Systems, what failures look like
  - Industrial Wastewater
- Universal/Hazardous/Dangerous Wastes –what they are
- Developing resource networks for joint inspections, information and referrals.
Task 4 Deliverables

<table>
<thead>
<tr>
<th>Deliverable</th>
<th>Target Deadline</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1 Draft training outline/agenda</td>
<td>Oct. 2021</td>
<td>$22,000</td>
</tr>
<tr>
<td>4.2 Draft training curriculum for TAC review</td>
<td>Nov. 2021</td>
<td>$40,000</td>
</tr>
<tr>
<td>4.3 Incorporate curriculum feedback</td>
<td>Feb. 2022</td>
<td>$20,000</td>
</tr>
<tr>
<td>4.4 Implement Trainings 4 Sessions</td>
<td>Feb. 2022</td>
<td>$10,000</td>
</tr>
<tr>
<td>4.5 Edited Training Video (videographer, complete edited version with Team input) King Co. staff</td>
<td>Sept. 2022</td>
<td>$5,900</td>
</tr>
<tr>
<td>4.6 Post training video and materials on website</td>
<td>Nov. 2022</td>
<td>$5,094</td>
</tr>
</tbody>
</table>

Task 4 Total $102,994

PROJECT TEAM DESCRIPTION

The project team is comprised of persons with strong management skills along with subject matter experts. The project manager has extensive experience managing successful projects, including co-managing the implementation of the BIG report. The team also includes 5 municipal source control specialists with extensive experience in source control and inspections as they relate to the permit. Two of the team are members of Ecology’s Pollution Prevention Assistance Partnership (PPA formally the Local Source Control Partnership). This team has worked together in the collection of information to completion of the BIG Report.

The Washington Stormwater Center (WSC), as the designated stormwater center for the State of Washington (RCW.90.48.545), has built an integrated stormwater program over the past nine years. Washington Stormwater Center/Washington State University. WSC staff work closely with several municipalities and have become the central point for stormwater research, technical and educational information to help ensure successful compliance with stormwater permits.

WSC’s role as Project Administrator and primary point of contact will be to ensure that the same rigor and peer review standards that we currently use are applied to this project. As an independent entity, we will provide transparency and objectivity in how the information for this project is analyzed and synthesized. In combination with our sub-consultant, we have the requisite skills and staff capacity to complete this project satisfactorily within the stated time allowances of the project.

LAURIE LARSON-PUGH | Project Manager
Laurie Larson-Pugh manages the Washington Stormwater Center’s Municipal Stormwater Program. Working with permittees across Washington state Laurie provides products, resources and training resources that they can use to successfully manage stormwater and stay in compliance with their permits. She also assisted with developing and managing specific projects.
Laurie was project co-lead in the analysis and implementation of the Business Inspection Group (BIG) Source Control Report. She managed and assisted BIG in surveying Western Washington Phase I and Phase II permittees to gather information on their source control programs. Laurie
Developing and Refining Source Control Inspection Programs for Businesses

worked with the City of Olympia to analyze the survey data used to create a resource for western WA Phase II permittees meet permit requirement S5.C.8. She also distributed the report and housed the report and support documents on the WSC website.

SUSAN McCLEARY, City of Olympia | Planning Committee/Technical Expert
Susan McCleary works for the City of Olympia Storm and Surface Water Utility. She has broad experience developing and implementing targeted outreach programs for business and residential populations. Susan has professional and academic training in sustainable urban development, social marketing, environmental education and holds a CECL endorsement. Susan has a strong background in project management with experience managing grants. She is an active member of Storm and Thurston County’s Regional Environmental Education Partnership (REEP) and Eco Network. Susan was co-founder of the Business Inspection Group (BIG) and holds the role of BIG co-lead. She co-managed and assisted BIG in surveying western Washington Phase I and Phase II permittees to gather information on their source control programs. Susan collaborated with the Washington Storm Center to analyze the survey data and create the Business Inspection Program Report, a resource for western WA Phase II permittees to meet permit requirement S5.C.8.

CYNTHIA HICKEY, King County | Planning Committee/Technical Expert
Cynthia Hickey manages King County’s Stormwater Source Control Program, which includes business inspections and water quality complaint investigations. She is also the Code Enforcement Officer for Stormwater Services. She is a member of Ecology’s Pollution Prevention Assistance Program (AKA Local Source Control), oversees the county’s PPA contract and conducts new inspector training. As a member of the former Interagency Compliance Team, she participated and facilitated in several major multi-agency enforcements and investigations. Prior to joining the stormwater world, she worked for King County Wastewater Treatment as a Senior Industrial Waste Investigator and as a management analyst for the division director. Cynthia was the principal author of the King County’s 2016 Stormwater Pollution Prevention Manual and is overseeing the current revisions. She also created the county’s first public rule for Stormwater Enforcement and is currently creating and documenting new procedures and processes, King County Stormwater Enforcement

TALLY YOUNG, City of Redmond | Planning Committee/Technical Expert
Tally Young works for the City of Redmond, where she administers the City’s PPA program. She also leads the City’s stormwater education and outreach program that is required under the NPDES permit. She completes, on average, about 150 inspections each year. She has over ten years’ experience in the environmental field, with the last four being at the City of Redmond. She has a green chemistry chemical stewardship certificate from the University of Washington and works with local businesses to find safer alternatives in their business practices.

KURT FREMONT, City of Tacoma | Planning Committee/Technical Expert
Developing and Refining Source Control Inspection Programs for Businesses

Kurt Fremont leads the City of Tacoma’s Environmental Compliance/Source Control Group enforcing the City’s stormwater and wastewater regulations in compliance with Ecology’s NPDES permits. Kurt has led or co-led the South Sound Phase II Permit Managers Group since 2008 helping Phase II jurisdictions collaborate on NPDES program development. Prior to coming to the City of Tacoma in 2009, Kurt worked in Ecology’s SWRO Watershed Resources Unit as a Construction Stormwater General Permit Inspector and a Phase I/II Municipal Stormwater Permit Manager. At the City of Tacoma, Kurt has enjoyed leading projects that include updating the City’s Municipal Code to meet changing NPDES permit requirements and developing and implementing programmatic changes the Source Control Group to catalogue a potential pollution generating businesses inventory and to develop the City’s private stormwater treatment device inspection program.

KEN WALDO, City of Redmond | Planning Committee/Technical Expert
Pollution Prevention Program Administrator, member PPA, member BIG
Ken has worked in the public sector for 14 years providing stormwater and groundwater pollution prevention technical assistance and spill prevention best practices to permittees and businesses. Ken administers Redmond’s Wellhead Inspection Program to minimize pollution risk to Redmond’s municipal drinking water aquifer and provides back-up support to Redmond IDDE/spill response. Ken is currently working on developing Redmond’s stormwater source control program to meet upcoming Phase II permit requirements and is also lead for code enforcement issues impacted the Utility.

There are two additional team participant groups. The consultant firm who will be identified through an RFP process. And the TAC will be comprised of municipal source control program managers and inspectors representing the Western Washington regional perspective. The TAC will review and evaluate the guidance manual and training materials for relevance and quality control of content.

<table>
<thead>
<tr>
<th>Name</th>
<th>Jurisdiction</th>
<th>Experience/Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jeremy Graham</td>
<td>Olympia</td>
<td>NPDES Coordinator, City of Olympia</td>
</tr>
<tr>
<td>Kim Jones</td>
<td>Newcastle</td>
<td>Surface Water Specialist</td>
</tr>
<tr>
<td>TBD</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TBD</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TBD</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TBD</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TBD</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Developing and Refining Source Control Inspection Programs for Businesses

PROJECT MANAGEMENT STRATEGY

The Project Manager will initiate a kick-off meeting with the Planning Team to review the project goals, objectives, and schedule along with setting clear expectations for team’s roles and responsibilities. Monthly check-ins with the planning team and consultant will be held to review timeline and milestones to evaluate progress and quality control of goals and project vision.

PROJECT BUDGET

<table>
<thead>
<tr>
<th>Task</th>
<th>Target Deadline</th>
<th>cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Task 1 Project Management</td>
<td></td>
<td>$17,088</td>
</tr>
<tr>
<td>Task 2 Information Search</td>
<td></td>
<td>$36,327</td>
</tr>
<tr>
<td>Task 3 Guidance Manual</td>
<td></td>
<td>$122,539</td>
</tr>
<tr>
<td>Task 4 Business Inspection Training</td>
<td></td>
<td>$102,994</td>
</tr>
<tr>
<td>Project Total</td>
<td></td>
<td>$278,945</td>
</tr>
</tbody>
</table>

PROJECT SCHEDULE

Prepared by the Washington Stormwater Center – Washington State University

WSU is committed to completing the proposed scope of work on budget and on time.

Dan Nordquist – Associate VP Research
Washington State University
May 15, 2020
Brandi Lubliner  
Stormwater Action Monitoring (SAM)  
Washington Department of Ecology  
Lacey, WA 98504-7600

Dear Ms. Lubliner,

If the proposal submitted by the Washington Stormwater Center titled “Developing and Refining Source Control Inspection Program for Businesses” is selected for funding, it is the intent of The City of Redmond to support Tally Young and Ken Waldo to work collaboratively as part of the project team. Tally Young and Ken Waldo’s role as project team members will include providing technical guidance in the development of the source control guidance manual content and training sessions curriculum. They will also assistance with implementing the trainings session along with editing training videos.

Sincerely,

Aaron Moldver  
Environmental Programs Supervisor  
City of Redmond
May 11, 2020

Brandi Lubliner
Stormwater Action Monitoring (SAM)
Washington Department of Ecology
Lacey, WA 98504-7600

Dear Ms. Lubliner,

If the proposal submitted by the Washington Stormwater Center titled “Developing and Refining Source Control Inspection Program for Businesses” is selected for funding, it is the intent of King County to support Cynthia Hickey to work collaboratively as part of the project team.

Cynthia’s role as a project team member will include providing technical guidance in the development of the source control guidance manual content and training sessions curriculum. She will also assistance with implementing the trainings session along with the editing training videos.

Sincerely,

Doug Navetski
Environmental Programs Supervisor

King County
Water and Land Resources Division
May 12, 2020

Brandi Lubiner, PE
Stormwater Action Monitoring Coordinator
Department of Ecology
Water Quality Program
300 Desmond Drive
Lacey, WA 98503

SUBJECT: Letter of Support for the Washington Stormwater Center’s proposal titled Developing and Refining Source Control Inspection Program for Businesses

Dear Ms. Lubiner,

The Washington Stormwater Center (WSC) will be submitting a proposal titled “Developing and Refining Source Control Inspection Program for Businesses” for Stormwater Action Monitoring (SAM) funding. If the project is selected for funding, the City of Olympia commits to providing the support of Susan Mc Cleary and Jeremy Graham to work collaboratively as part of the project team. Susan’s and Jeremy’s role, as project team members, will include providing technical guidance in the development of the source control guidance manual content and training sessions curriculum. They will also provide assistance with implementing training sessions and editing training videos.

The City of Olympia sees value in WSC’s proposal and requests SAM to approve the project’s funding. If you have any questions, please do not hesitate to contact me at echriste@ci.olympia.wa.us or 360.570.3741. Thank you.

Sincerely,

ERIC T. CHRISTENSEN
Water Resources Director
Public Works Department
May 12, 2020

Brandi Lubliner  
Stormwater Action Monitoring (SAM)  
Washington Department of Ecology  
Lacey, WA 98504-7600

Dear Ms. Lubliner;

If the proposal submitted by the Washington Stormwater Center titled “Developing and Refining Source Control Inspection Program for Businesses” is selected for funding, it is the intent of the City of Tacoma to support Kurt Fremont to work collaboratively as part of the project team.

Kurt’s role as a project team member will include providing technical guidance in the development of the source control guidance manual content and training session’s curriculum. He will also assist with implementing training sessions and editing training videos.

If you have any questions, please contact me at 253-502-2191 or via email at dthompso@cityoftacoma.org.

Sincerely,

Dan C. Thompson, Ph.D.  
Dan C. Thompson, Ph.D.  
Business Operations Division Manager  
Environmental Services