FP5 Responses

Developing and Refining Source Control Inspection Programs for Businesses

August 7, 2020

FP5 RESPONSES TO REVIEW SUMMARY 6-30-20

Developing and Refining Source Control Inspection Programs for Businesses

Comment 1:

Make it clear how survey results can help generating the guidance /manual (Task 2 vs Task 3).
Task 2 focuses on gathering information. Items and actions included in this task:

- Interviewing Phase II jurisdictions not interviewed for the BIG Report (Report). Emphasizing a peer to peer experience.
- Utilize Report survey questions along with questions to identify knowledge gaps. For example, how jurisdictions can update their inventories. The report only covered how programs were developed.
- Identify existing tools, templates and materials available to source control programs beyond the 8 jurisdictions and include national programs successes.
- Identified materials shall inform the development of adaptable check lists, forms, templates, and tools jurisdictions can customize to their specific program requirements.
- Gather information to populate a resource library/document with links to relevant reference materials.

Task 3 is focused on organizing the information. Organized into a guide that supports Phase II jurisdictions with the development and implementation of business inspections programs. The information gathered in Task 2 will be organized in a structure that aligns with the NPDES Permit's Source Control Program for Existing Development (S5.C.8) requirement deadlines. The manual shall also include resource directory.

Comment 2:

Differences from previous, existing manual? How to improve existing programs?
The BIG Report compiled information about western Washington Phase I and two Phase II jurisdictions with established business inspection programs. Not all aspects of a Source Control Business Inspection Program were included in the BIG Report. Those aspects addressed in the Report didn't provide a detailed exploration into the subject matter. The Project Team is not aware of any extant manuals for developing source control programs.

The objective of this project is to provide a detailed guidance manual that captures how to develop and implement a Phase II Source Control Business Program. Along with developing resource materials (templates, check lists, and tools) for Western Washington Phase II permittees in meeting permit requirement S5.C.8 of the 2019-2024 permit.

Existing programs will be able to use this manual to get ideas on improving their own programs and utilize the training information. The manual itself, will be a useful training aid for new employees in any jurisdiction.

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Comment 3:

Implementation of training is missing from the schedule.

The goal is to host four in-person 1-day training workshops with both classroom and field components. The training workshops will be hosted by four jurisdictions within the North, Central, South and West Sound regions of Western Washington. To ensure the training sessions are implemented on a schedule providing jurisdiction staff training prior to permit requirement deadlines. The training workshops will be recorded to develop a series of short training videos. The training video series and materials will be available to municipal staff on the Washington Stormwater Center Source Control web page.

In light of the COVID-19 pandemic, in-person training may not be possible. The Project Team has developed a contingency for on-line training. The on-line training outline includes on-line live presentations and pre-recorded field demonstration videos.

At the time FP5 was prepared King County had agreed to providing their staff videographer for the recording and editing of the video series. If due to the COVID-19 budget reductions or other restrictions, the King Counties videographer isn't available, the project team has prepared a Plan B option. The plan would require hiring a private videographer. This option will require an adjustment to the budget to cover the cost of hiring a private videographer.

Source Control Training Schedule:

Source Control Training Schedule: Developing & Refining source Control Inspection Programs for Businesses	WSC	Project Team	Consultant	TAC	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23
Permit Deadlines																									
Inventory S5.C.8.b.i, New Ordinances S5.C.8.b.ii																				▮					
Inspection Program S5.C.8.b.iii, Records Mgmt. S5.C.8.b.iv, Enforcement Policy S5.C.8.b.iv.c																									▮
Implementing/Complete																									▮
Task 4.0 Business Inspection Training																									
4.1 Create training outline/agenda		X	X	X		▮	▮																		
4.2 Drafting training curriculum		X	X					▮	▮																
4.2.Option A In-person training - dependent on COVID-19 status		X							▮	▮			▮												
4.2.Option B On-line training - dependent on COVID-19 status		X							▮	▮			▮												
4.3 TAC Review of draft Training curiculum				X						▮															
4.4 Update curriculum with TAC comments		X											▮												
4.5 Finalize training curriculum		X													▮										
4.6 Training implementation schedule	X	X												▮											
4.7 Record & edited training videos	X	X													▮	▮									
4.8 Post training videos and materials to	X															▮	▮								

Comment 4:

Valuable for phase II-this study outcome will be helpful and time sensitive.

The Project Team is comprised primarily of Phase II municipal source control inspection staff. Who are tasked, with developing and implementing a Source Control Business Inspection Program to meet their own permit obligation under S5.C.8. The Project Team is dedicated to working with a consultant(s) in developing the guidance manual and training workshops they will use in developing their programs. The Project Team is aware of the schedule required to develop the manual and training to align with the permit obligations.

This team includes members involved in developing the BIG Reports. Along with volunteering to interview jurisdictions with established source control business inspection programs. The result of their dedication is the BIG Report providing examples and best practices for developing a business Inspection Program.

Source Control Timetable with Permit Milestones

SAM Source Control Guidance Manual & Training Schedule