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TECHNICAL MEMORANDUM

Date: September 7, 2021

To: Laurie Larson-Pugh

Copy to: Technical Advisory Committee

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Subject: Business Inspection Program Report (BIG Report) Gap Analysis

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BACKGROUND

The Business Inspection Group (BIG) prepared the Business Inspection Program Report (BIG Report) in January 2020 to summarize interviews and compile resources from eight jurisdictions in Western Washington (six Phase I permittees and two Phase II permittees). Information gathering included a survey to gain knowledge of existing business inspection programs across the region. Findings from the survey are summarized in the BIG Report at a high level, with corresponding resources linked in the appendices. The main text sections and appendices within the BIG Report are organized as follows.

BIG Report Section Number	BIG Report Section Name	BIG Report Appendix Reference
Section 1	Education and Outreach	Appendix C
Section 2	Code and Code Enforcement	Appendix D
Section 3	Data Collection and Management	Not applicable
Section 4	Inventory Development and Updates	Appendix E
Section 5	Inspection Protocol	Appendix F
Section 6	Program Management	Appendix G

GAP ANALYSIS

This technical memorandum is intended to identify gaps in the original BIG Report and provide recommendations to fill those gaps. Sections 3 through 6 from the original BIG Report have been combined into a single section in this technical memorandum (Developing and Implementing a Business Inspection Program). This technical memorandum is organized as follows.

Category	BIG Report Section/Appendix References	Table References for Gap Analysis
Business Education and Outreach Materials	Section 1, Appendix C	Table 1
Source Control Codes/Ordinances and Enforcement Policies	Section 2, Appendix D	Table 2
Developing and Implementing a Business Inspection Program	Sections 3 through 6, Appendices E through G	Tables 3, 4, and 5

Business Education and Outreach Materials

Summary of BIG Report Resources

The BIG Report summarized responses from five interview questions and compiled a total of 27 business education and outreach materials. Table A-1 in Attachment A of this technical memorandum summarizes the audience, format, business sector (if applicable), and activities that each outreach material is intended to address.

Gaps in BIG Report Resources

Table 1 summarizes the identified gaps in the business education and outreach materials and provides some recommendations/next steps.

Table 1. Gaps Identified in Business Education and Outreach Materials.		
Brief Summary of Gap	**Detailed Description of Gap**	**Recommendations/Next Steps**
Target audience applicability	Eight of the twenty-seven education and outreach resources targeted residential properties and are not directed towards business owners or employees.	Shift single-family residential-focused resources to a separate section/topic in the online resource library and clearly label as such. Retain multi-family residential resources in the online resource library.
Messaging matching the target audience	Messaging is different for business and/or site owners (responsibility, requirements) versus employees.	Identify which materials are most useful for each audience.
Communicate program requirements to business owners	Only a few brochures, letters, and a website were provided that communicate program requirements to business owners prior to an inspection.	Define Source Control program requirements for site and business owners as defined by the NPDES municipal stormwater permits. Identify the target audience—the business owner, the site owner, or both—and develop materials (general and BMP-specific) for that audience. Consider creating online resources to connect large sectors with relevant BMPs and requirements. Outreach materials can direct businesses to online resources.
Limited business sectors covered	Limited materials available for auto-related businesses, landscaping, and mobile businesses.	Identify target business sectors to focus on for this project. Collect or create materials that address those business sectors.
Limited activities covered	Limited materials available for pressure washing, carpet cleaning, and painting.	Identify the top five priority BMPs or problems to focus on for this project, and collect or create materials that address those activities.
BMPs specific to activity type or business sector	Some materials focus on BMPs for an activity or suite of activities, others focus on the business sector.	Identify audience needs and determine which approach is the most useful and effective. Evaluate capacity for small jurisdictions to implement targeted online messaging.
Target audience language	Limited materials are available in languages other than English.	Identify languages, cultural relevance, and the most effective materials for translation/transcreation.
Limited variety in material format	Compiled materials included one sticker (restaurant mop water), four posters, and zero fact cards.	Identify which formats work best for the purpose and audience (employee versus owner, formal letter versus short/concise BMPs on fact card, or website).

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Table 1 (continued). Gaps Identified in Business Education and Outreach Materials.		
Brief Summary of Gap	**Detailed Description of Gap**	**Recommendations/Next Steps**
Filenames are incorrect or are not descriptive enough	Filenames often are misleading in terms of the content of the education/outreach material.	Rename files using a standard format. More informative filenames with short descriptions may help users find the materials they need more easily. Recommended terminology to be included in the filename may include material format (poster, brochure, sticker), sector (restaurant, carpet cleaner), and/or activity (pressure washing, dumpster, spill plans).
Printing/production costs	Approximate cost of printing materials for each type of format (e.g., poster, brochure, fact card, sticker) was not provided.	Consider developing printing/production cost ranges or cost-saving recommendations. Determine which native-format files would be the most useful for in-house and vendor production. Consider the advantages and disadvantages of cost sharing generic and bulk printed materials rather than customizing with local logos and phone numbers.
Review existing focus group reports of businesses and employees	Compiled materials did not include focus group reports, but several materials were developed with the assistance of a focus group.	Review existing reports to summarize preferences for how businesses are contacted, communication methods, outreach material formats, and messaging. Provide guidelines for concise, effective, and relevant outreach methods/materials. Determine the most effective basic level of messaging.
Missing information on customization and copyright	Not all materials can be edited or modified due to copyright. Jurisdictions may need to make modifications,	Identify copyright status in resource matrix, when known. Indicate which materials can be modified and to what extent.
Lack of consistent language/terminology	Related to customization of materials, prevent dilution or confusion of messaging across jurisdictions when resources are modified. Plain-talk approach is important.	Establish a common language dictionary for program materials that should not be modified by individual jurisdictions. *Need for consistent language applies to the guidance manual and all resources (e.g., business inspection vs. source control)

BMP = best management practices

Source Control Codes/Ordinances and Enforcement Policies

Summary of BIG Report Resources

The BIG Report summarized responses from five interview questions and compiled a total of 22 source control codes/ordinances and enforcement policy examples. Table A-2 in

Attachment A of this technical memorandum summarizes the resource type, audience, formats, and communication type that each resource is intended to address.

The current list of resources is extensive and provides thorough examples for municipal code language, enforcement process (including penalty rating matrices), and notification letters.

Gaps in BIG Report Resources

Table 2 summarizes the identified gaps in the source control codes/ordinances and enforcement policy examples and provides some recommendations/next steps.

Table 2. Gaps Identified in Source Control Codes/Ordinances and Enforcement Policies.		
Brief Summary of Gap	**Detailed Description of Gap**	**Recommendations/Next Steps**
Large/complex files that are not focused on source control/business inspections	Long documents are not helpful without highlighting key content that is relevant to a business inspection program. This is a limitation in the Appendix D resources (i.e., example Title 11 code language).	Shorten by placing relevant pages/sections into a streamlined version of the resource. Highlight relevant code/ enforcement language sections for the online resource library. Consider creating a matrix "code builder" resource for jurisdictions to compare or identify essential elements to add to their own codes.
Ungrouped files	Certain resources could be grouped together into a single file to provide more context, especially related documents. For example, Resource D3 (Enforcement Penalty Script Matrix) provides context to fill in a matrix, but the matrix is stored in a different file (D13). D12 is a separate, similar resource but designed to stand alone.	Combine related resources into a single file for the online resource library.
Filenames are incorrect or are not descriptive enough	Filenames often are incorrect or misleading in terms of the content of the resource. For example, Resource D4, "Notification of Illicit Discharge Letter," is actually a preventive informational letter for business owners, not related to any violation. Other filenames were flagged for discrepancies between the filename and topic.	Rename files using a standard format. More informative filenames with short descriptions may help users find the materials they need more easily in the online resource library.
Missing helpful resources	Current materials do not reference the MRSC or the SPU Lean process (non-compliance/enforcement strategy)	Include information about these resources in the guidance manual and/or consider for content development.

MRSC = Municipal Research and Services Center

SPU = Seattle Public Utilities

Developing and Implementing a Business Inspection Program

Summary of BIG Report Resources

The BIG Report summarized responses from 24 interview questions and compiled a total of 19 resources related to developing and implementing a business inspection program. Table A-3 in Attachment A of this technical memorandum summarizes the resource type, audience, formats, and communication type that each resource is intended to address.

The current list of resources for this section is extensive and provides thorough examples for notifying a business owner of compliance, issuing a corrective action notice, and providing educational materials for correction.

Gaps in BIG Report Resources

The resources in this section have been organized by sequential elements in the business inspection process:

- Developing a business inventory and prioritizing inspections (Table 3)

- Establishing procedures and conducting inspections (Table 4)

- Data management and recordkeeping (Table 5)

A subsection at the end also addresses adjustments to a business inspection program that may be needed over time.

Developing a Business Inventory and Prioritizing Inspections

Table 3 summarizes the identified gaps related to developing a business inventory and prioritizing inspections and provides some recommendations/next steps.

Table 3. Gaps Identified in Developing a Business Inventory and Prioritizing Inspections.		
Brief Summary of Gap	**Detailed Description of Gap**	**Recommendations/Next Steps**
Limited information on developing a business inventory	Only one resource was included for developing a source control inventory.	Rely on interview responses (from original BIG Report and supplemental interviews) and resources from other parts of the country to develop content for the guidance manual.

Table 3 (continued).   Gaps Identified in Developing a Business Inventory and Prioritizing Inspections.

Brief Summary of Gap	Detailed Description of Gap	Recommendations/Next Steps
No information provided on the similarities and differences of Pollution Prevention Assistance (PPA) programs	No additional information provided (see "Brief Summary of Gap" column in this table).	Summarize the similarities and differences of PPA programs in developing their lists and how Phase II permittees develop their business inventory for the guidance manual. Identify where Phase II jurisdictions could build upon an existing PPA list and supplement the list.
Limited information is provided on the frequency of updating a business inventory	No additional information provided (see "Brief Summary of Gap" column in this table).	Rely on discussions with the Technical Advisory Committee (TAC) and possible follow up with interviewed jurisdictions to develop content for the guidance manual related to maintaining and updating a business inventory.
Limited information is provided on the total number of businesses in each inventory	Could estimate based on the 20 percent of inspections per year criterion, but no specific numbers or ranges for the total number of businesses were provided in response to the interview questions.	Rely on discussions with the TAC and possible follow up with interviewed jurisdictions to develop content for the guidance manual related to staffing needs associated with the number of businesses in each inventory.
Limited information on prioritizing business inspections	Only one example of an inspection frequency algorithm was provided.	Rely on discussions with the TAC, resources from other parts of the country, and possible follow up with interviewed jurisdictions to develop content for the guidance manual related to sectors that have the most potential to pollute and have required the most resources and/or follow-up actions.
Advantages or disadvantages of coordinating with other programs (e.g., ISGP)	Should sites that are covered by the ISGP and visited by Ecology be deprioritized in the inventory?	Develop list of advantages and disadvantages of partnership with Ecology or neighboring jurisdictions for the guidance manual.
NAICS code approach to inventory	NAICS codes are self-reported and not verified, often inaccurate, and require field verification during inspection.	Develop inventory approach (or multiple approaches) as part of iterative process for the guidance manual that acknowledges the limitations of NAICS codes.

BIG = Business Inspection Group   PPA = Pollution Prevention Assistance

ISGP = Industrial Stormwater General Permit   TAC = Technical Advisory Committee

NAICS = North American Industry Classification System

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Establishing Procedures and Conducting Inspections

Table 4 summarizes the identified gaps related to establishing procedures and conducting inspections and provides some recommendations/next steps.

Table 4. Gaps Identified for Establishing Procedures and Conducting Inspections.		
Brief Summary of Gap	**Detailed Description of Gap**	**Recommendations/Next Steps**
Staff qualifications, training process, and materials • Inspectors • Staff conducting PPA technical assistance programs	Only one example of job qualifications was provided.	Rely on discussions with the TAC to develop content for the guidance manual related to staff qualifications, training process, and materials. Consider including reading lists, recommendations for job shadowing, and recommended trainings.
Inspection procedures	Only one SOP Manual was provided.	Rely on interview responses (from original BIG Report and supplemental interviews), discussions with the TAC, and resources from other parts of the country to develop content for the guidance manual. Consider developing checklists for major business sectors or activity types.
Inspecting permitted sites/businesses	Provide more information on how to approach, schedule, and coordinate with Ecology-permitted sites.	Rely on discussions with the TAC and possibly Ecology to develop content for the guidance manual.
Conducting an initial inspection	General resources provided, but not for specific facility types.	Consider developing checklists for major business sectors or activity types.
Conducting a follow-up inspection	An example of a separate inspection form was not provided for follow-up inspections.	Consider developing a streamlined checklist for follow-up inspections.
Summarizing the inspection site visit and leaving the owner/ manager a clear "to do" list	There are multiple examples of post-inspection notices (notice of violation, notice of corrective action) with varying degrees of information, but limited details for implementing BMPs and correction items.	Resources should be reviewed thoroughly to determine optimum format, size, and messaging.
Providing storm system maintenance and technical assistance	This is a key BMP, but there was little information, and only one maintenance provider list was provided.	A generic maintenance provider list with "how to clean your CBs" or "How to check sediment levels" may be helpful. Some of these resources have already been developed regionally and can be added to the online resource library for this project.

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Table 4 (continued). Gaps Identified for Establishing Procedures and Conducting Inspections.		
Brief Summary of Gap	**Detailed Description of Gap**	**Recommendations/Next Steps**
Incentive programs	There is one incentive program included in the resources targeting Small Quantity Generators. There is also a link to a "catch basin cleaning initiative."	Research other incentive programs and their results. Consider low barrier and low-cost programs (e.g., "Stormwater Steward Business" window decal).
Limited information on local and regional coordination	No additional information provided (see "Brief Summary of Gap" column in this table).	Identify other inspection programs implemented locally and regionally. Describe the opportunities to combine programs, partner with other programs, and challenges and/or benefits of a coordination approach.
Document size/ complexity	Long documents are not helpful without highlighting key content that is relevant to a business inspection program. This is a limitation in the Appendix G resource (e.g., City of Seattle 2019 NPDES Phase I Municipal Stormwater Permit Stormwater Management Program).	Shorten by placing relevant pages/ sections into a streamlined version of the resource or highlight relevant language for the online resource library.
Some resources are too locally specific	Highly specific procedures for a local jurisdiction may not be easily adapted by other jurisdictions (such as staff onboarding protocols) and could potentially be excluded to streamline the guidance manual. Examples include: ●Resource F13: Source Control Training Checklist. Includes full list of staff training (such as Defensive Driving Class) and timesheet/hours information ("If you are late … call Cynthia"). ●Resource F14: Source Control Checklist. Includes specific item and sequence codes, potentially related to internal tracking of inspections. This is not helpful as a stand-alone document and requires more context (and may be too specific to be useful to other jurisdictions).	Develop guidance manual content that is more specific to source control inspections and more adaptable to other jurisdictions. Exclude examples from the online resource library that are highly specific to a single jurisdiction.
Filenames are incorrect or are not descriptive enough	Filenames often are incorrect or misleading in terms of the content of the resource. Other filenames were flagged for discrepancies between the filename and topic.	Rename files using a standard format. More informative filenames with short descriptions may help users find the materials they need more easily in the online resource library.

BMP = best management practices   NPDES = National Pollutant Discharge Elimination System

CBs = catch basins   SOP = Standard Operating Procedure

Ecology = Washington State Department of Ecology   TAC = Technical Advisory Committee

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Data Management and Recordkeeping

Table 5 summarizes the identified gaps related to data management and recordkeeping and provides some recommendations/next steps.

Table 5. Gaps Identified for Data Management and Recordkeeping.		
Brief Summary of Gap	**Detailed Description of Gap**	**Recommendations/Next Steps**
Conducting an initial inspection	No electronic inspection forms provided.	Consider developing an electronic form in adaptable format (e.g., ESRI Survey123 XLS Form) as part of this project.
Conducting a follow-up inspection	No electronic inspection forms provided.	Consider developing an electronic form in adaptable format (e.g., ESRI Survey123 XLS Form) as part of this project.
No comparison of data management systems	No additional information provided (see "Brief Summary of Gap" column in this table).	Consider developing a matrix identifying data management systems and the challenges, benefits, and recommendations for each type of system to include in the guidance manual. Data management system presentations from BIG can be incorporated as additional resources in the online resource library.
Recommendations for small jurisdictions	What is the simplest, easiest, and most complete data management system for a small jurisdiction?	The system needs to align with the size of the program. Consider providing tiered recommendations in the guidance manual based on population or number of businesses in an inventory.
Recommendations for attaching/storing site photos	No additional information provided (see "Brief Summary of Gap" column in this table).	Consider providing recommendations in the guidance manual related to this topic.

BIG = Business Inspection Group

ESRI = Environmental Systems Research Institute

Inspection Program Adjustments

This technical memorandum emphasizes developing and implementing a business inspection program. However, tracking inspection outcomes and which parameters to track to evaluate the program's success are important to inform future permit requirements, make program adjustments, and develop new education and outreach materials.

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RECOMMENDATIONS AND NEXT STEPS

This technical memorandum identified gaps in the original BIG Report and provided recommendations/next steps to fill those gaps in the online guidance manual and the online resource library that will be developed for this project. The TAC and project team will discuss these gaps and how to proceed with presenting this information in the online guidance manual, approaches for locating other existing resources to share with permittees in Washington through the online resource library, and the identification of key topics for supplemental resources that should be developed as part of the online guidance manual.

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ATTACHMENT A

Resource Matrix Tables

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Table A-1. Business Education and Outreach Materials Resource Matrix.

Resource Number	BIG Appendix	Resource Name (and link)	Outreach Materials	Business Owner	Employees	Residential	8x11 sheet (# of pages)	Website	Brochure	Fact Card	Sticker	Poster	Multiple Languages?	Auto	Landscaping	Mobile	Restaurant	Maintain Storm System	Drips, Spills, Leaks	Washing, Disposal	Spill Kits/Plans	Cover Storage Areas	Liquid Storage/Containment	Grease/FOG	Dumpsters	Pesticide/Fertilizers	Notes/Description
C1 and C20-24	C	Auto Shop 4C's poster	✓		✓							✓	✓	✓					✓			✓	✓				Poster based upon priority BMPs and business sector focus group data. Available in multiple languages including Spanish, Vietnamese, Russian, Korean, and Khmer.
C2	C	Be the Solution to Surface Water Pollution Post Inspection Handout	✓	✓					✓																		Succinct handout with inspection results, correction actions, uses focus group data developed graphic.
C3	C	Only Rain Down the Drain Brochure	✓	✓					✓									✓	✓	✓	✓		✓	✓	✓	✓	Brochure describing the purpose, process and high priority BMPs. Uses focus group data informed graphics.
C4	C	BMP A306: Landscaping and Lawn/Vegetation Management	✓	✓			8								✓											✓	4 page detailed BMPs for Landscaping from a Stormwater Manual, dense wording.
C5	C	Call Before You Cut Those Trees Handout	✓	✓		✓																					Link to resource was not working
C6	C	Car Wash BMPs Ecology	✓	✓	✓		2																				2-page BMP poster based upon focus group data, awareness and BMPs. Jurisdictions would need to verify if the BMPs recommended match the messaging.
C7	C	Car Wash Poster	✓			✓						✓															Poster is general, targeting homeowners
C8	C	Catch Basins One Pager	✓	✓	✓		2											✓									2-pager focusing on catch basin cleaning and general storm system awareness using a detailed storm/sewer/surface waters graphic.
C9	C	Cleaning and Washing BMPs	✓	✓	✓		8													✓				✓			8-page detailed BMP information from a stormwater manual. Covers many types of commercial washing activities.
C10	C	General Business Incentive Program	✓					✓										✓	✓	✓	✓	✓	✓		✓	✓	Website for incentive/recognition program. Stormwater is a subcategory. The stormwater web page lists many BMPs with no photos. Has a link to the "Catch Basin Cleanout Program" https://clark.wa.gov/public-works/catch-basin-cleanout-program
C11	C	Stormwater Education and Outreach Page	✓	✓	✓			✓																			Links to multiple business brochures that are downloaded and described below.
C12	C	Leaky Car Brochure	✓			✓																					Not business-specific, targets homeowners
C13	C	FOG BMPs Brochure	✓	✓	✓				✓								✓			✓				✓			Comprehensive FOG info and BMPs for restaurants, hood vent cleaners, grease interceptors
C14	C	Only Rain Down the Drain Sticker	✓								✓						✓										Simple "do/don't" sticker to post near sink or on a mop bucket
C15	C	Only Rain Down the Drain Poster	✓	✓	✓							✓	✓				✓			✓				✓		✓	Poster based upon priority BMPs and business sector focus group data. Clear "Do's/Don'ts" with photos. Available in English and Tagalog.
C16	C	Residential FOG Poster	✓			✓											✓										
C17	C	Storm Hood Vent and Pressure Wash Letter	✓	✓			1										✓			✓				✓			Formal letter describing codes, responsibilities and BMPs for pressure washing, hood vent cleaning, and FOG storage/disposal
C18	C	Safer Cleaning Infographic	✓	✓			2																				Safe cleaning products, harm of chemicals
C19	C	Stormwater BMP Brochure	✓	✓					✓									✓	✓	✓	✓		✓	✓			Focus on NPDES, Business Responsibilities, and BMPs
C25	C	Wastewater-Stormwater-in-House	✓	✓	✓	✓	1																				Infographic and text showing stormwater vs. wastewater, residential focus
C26	C	Ways to Help Puget Sound	✓	✓	✓	✓																					General water quality brochure, programs
C27	C	Neighborhood Wetland Education Brochure	✓	✓	✓	✓			✓																		The purpose of wetlands, care of wetlands, and programs

Table A-2. Source Control Codes/Ordinances and Enforcement Policies Resource Matrix.

Resource Number	BIG Appendix	Resource Name (and link)	Resource Type					Audience			Communication Type (external)			Notes/Description
			Code/ Ordinance	Enforcement	Program Guidance	Outreach Materials	Notification Letter	Program Lead/ Manager/ Supervisor	Municipal Inspector	Business Owner	Pre-Inspection	During Inspection	Post-Inspection	
D1	D	Enforcement Workflow Diagram		✓	✓			✓	✓					Diagram for cycle of inspection & enforcement action. Internal document, not shared with businesses.
D2	D	Chapter 13.26A in Title 13	✓	✓				✓	✓	✓				Links to the entire Water Quality code section (from Clark County). Would need to provide a more specific code section reference to assist others with their source control codes/ordinances.
D3	D	Enforcement Penalty Script Matrix		✓	✓			✓	✓					Guidance for categorizing enforcement/compliance matrix. Internal document, not shared with businesses.
D4	D	Preventing Illicit Discharges Letter				✓	✓			✓	✓			This file should be renamed since it is about "Preventing Illicit Discharges," not notification of an illicit discharge. Provides general information about BMPs and enforcement.
D5	D	Internal Enforcement Action Form		✓	✓			✓	✓					Internal document for enforcement. Also includes an external "Notice of Violation Stop Work Order" - should this be a separate document/resource?
D6	D	Jurisdictions code Title 11	✓	✓				✓	✓	✓				Links to the entire Storm Drainage and Surface Water Management code section (from Pierce County). Would need to provide a more specific code section reference to assist others with their source control codes/ordinances.
D7	D	Code Enforcement	✓	✓				✓	✓	✓				Chapter 1.04, Code Enforcement (unknown jurisdiction)
D8	D	Sanitary Sewer Code	✓	✓				✓	✓	✓				Links to the entire Sanitary Sewers code section (from the City of Kent). Would need to provide a more specific code section reference to assist others with their source control codes/ ordinances.
D9	D	Illicit Discharge Code	✓	✓				✓	✓	✓				Links to the entire Illicit Discharges code section (from the City of Kent). Would need to provide a more specific code section reference to assist others with their source control codes/ ordinances.
D10	D	Stormwater Code	✓	✓				✓	✓	✓				Links to the entire Water Quality code section (from King County). Would need to provide a more specific code section reference to assist others with their source control codes/ordinances.
D11	D	Notice of Violation Letter					✓			✓			✓	Notice of violation and penalty, letter to business owner (presumably after failed follow-up inspection)
D12	D	Penalty Matrix Guidelines		✓	✓			✓	✓					Internal scoring guide to determine penalty ($) based on points for environmental impact, action taken to remedy, etc.
D13	D	Penalty Matrix Template		✓	✓			✓	✓					Accompanied by enforcement matrix script (D3). Internal scoring document to determine penalty by rating points (similar to D12, different jurisdiction)
D14	D	Letter of Admonishment					✓			✓			✓	Same jurisdiction as D4, initial enforcement letter with corrective actions listed.
D15	D	Correction Notice					✓			✓	✓		✓	Correction notice issued prior to notice of violation ($500 penalty). Assume this would be sent after first inspection, prior to follow-up inspection.
D16	D	Notice of Violation					✓			✓			✓	Notice of violation for fine immediately due, follows the Correction Notice (D16). Recipient must select either payment of fine, mitigation hearing, or contested hearing.
D17	D	Voluntary Correction Agreement			✓			✓	✓	✓	✓		✓	This is an agreement for both parties (business owner and enforcement entity) to sign agreeing to additonal time to reach voluntary compliance for acknowledged code violations, subject to follow-up inspection at any reasonable time.
D18	D	Stormwater Drainage Enforcement Rule and Guidelines	✓	✓	✓			✓	✓	✓				This is a code document (rule) for enforcement that outlines enforcement steps, types of violations, delegation of authority, penalty matrix, etc.
D19	D	Title 11 in Pierce County's code	✓	✓				✓	✓	✓				Duplicate of D6. Links to the entire Storm Drainage and Surface Water Management code section (from Pierce County). Would need to provide a more specific code section reference to assist others with their source control codes/ordinances.
D20	D	Stormwater Compliance Policy		✓	✓			✓	✓	✓				Document of enforcement procedures to augment code
D21	D	Stormwater Municipal Code	✓	✓				✓	✓	✓				Links to the entire Wastewater and Surface Water Management code section (from Tacoma). Would need to provide a more specific code section reference to assist others with their source control codes/ordinances.
D22	D	FOG Removal Device Installation				✓	✓			✓			✓	Post-inspection notice for "does not meet regulatory standards" focused on protecting sanitary sewer from FOG.

Table A-3. Developing and Implementing a Business Inspection Program Resource Matrix.

Resource Number	BIG Appendix	Resource Name (and link)	Inspection Form/Checklist	SOPs	Program Guidance	Outreach Materials	Notification Letter	Program Lead/Manager/Supervisor	Municipal Inspector	Business Owner	Pre-Inspection	During Inspection	Post-Inspection	Notes/Description
			Resource Type					Audience			Communication Type (external)			
E1	E	Source Control Inventory Development			✓			✓	✓					Internal procedure for updating source control inventory (assumes an inventory database already exists)
F1	F	Business Inspection Form 1	✓						✓			✓		General on-site inspection form, addresses housekeeping BMPs with placeholder for additional BMP Deficiencies
F2	F	Inspection Checklist	✓						✓			✓		General on-site inspection form with some specific high-risk activities identified
F3	F	BMP Supplies and Services				✓				✓	✓	✓	✓	Resource list that could be provided to a business before, during, or after an inspection
F4	F	Business Inspection SOP Manual		✓					✓					Inspection Standard Operating Procedures Manual (2019)
F5	F	Commercial Inspection Form	✓						✓			✓		Commercial inspection form, includes some reference content for stormwater regulations
F6	F	FOG Courtesy Contractors List				✓				✓	✓	✓	✓	Contractor list for installation, maintenance, recycling, side sewer related to FOG that could be provided to a business before, during, or after an inspection
F7	F	Annual Stormwater Management Facilities Inspection Results					✓			✓			✓	Template notification letter for required actions (similar to items in Appendix D)
F8	F	Inspection Frequency Algorithm			✓			✓						Scoring guidance to determine priority/frequency of inspection (low/med/high) based on LU and compliance history
F9	F	Inspection Prioritization and Modification		✓	✓			✓	✓					This reads as a letter to Ecology to document methods for compliance, but could also be useful as a recommended procedure for developing an inventory.
F10	F	Post Card Notification of Satisfactory Inspection				✓	✓			✓			✓	Quick notice that facility is in compliance & thanking for participation
F11	F	Source Control Re-Inspection Letter					✓			✓	✓		✓	Follows initial inspection, gives date for follow-up and lists required BMPs
F12	F	Source Control Inspection Results for In Compliance					✓			✓			✓	This file should be renamed since it is a follow-up letter for sites in compliance (not sites that are "incompliance")
F13	F	Source Control Training Checklist	✓		✓			✓	✓					This is an onboarding list for new staff/inspectors (not necessarily helpful without accompanying materials)
F14	F	Source Control Checklist	✓		✓									Follow-up codes for related checklists (not necessarily helpful as a stand-alone document)
F15	F	Stormwater Drainage Courtesy Contractor List				✓				✓	✓	✓	✓	Resource list that could be provided to a business before, during, or after an inspection
F16	F	Business Inspection Form 2	✓					✓	✓				✓	Example of a completed inspection form (general - could apply to any business)
F17	F	Inspector Job Qualifications			✓			✓	✓					Example of job qualifications for hiring inspector(s)
G1	G	City of Seattle 2019 NPDES Phase I Municipal Stormwater Permit Stormwater Management Program			✓			✓	✓					Entire 103-page SMP (2019) report. Not sure this is helpful without more focus. Technically a public posted document but unlikely to be read by business owners.