

Draft Phase II Western Washington Municipal Stormwater Permit Errata Sheet

Ecology found two typos in the formal draft of the Phase II Western Washington Municipal Stormwater Permit. Since it is a formal draft, Ecology cannot change these typos until it issues the final draft. This errata sheet is to clarify Ecology's original intent in the draft:

- 1) Pages five and six (S1 B. 1-8) contain a numbering and lettering error. Numbers 2 through 5 should actually read as sub-letters a. through d. under S1-B.1. Numbers 6 through 8 should be numbers 2 through 4 under S1-B.

- 2) On page 36, line 19 (under S9 Reporting), the report due on March 31, 2008 should cover the period until December 31, 2007 not 2008.

Part II. Expenditure Report Form 1.2

The expenditure report tracks program expenditures for cities towns and counties. Use of this form is optional for Secondary Permittees.

Cost data are needed to make determinations of practicability, compare effectiveness of programs and gauge budget and assistance needs.

Include indirect program administrative costs in the expenditure tracking for FTEs and other direct costs. Please provide assumptions and data limitations as necessary.

General instructions for cost reporting

- Track costs and benefits for labor of stormwater staff for each program component on a reasonable basis. (A program component (or component) is a section of the SWMP as listed in the permit.)
- Include direct costs (e.g. phone, field and office supplies, etc.) and depreciation costs (e.g. vehicles and equipment) for each component.
- Allocate overhead costs for the entire stormwater program to each cost category. Overhead allocation is often estimated as a straight percentage of labor cost and includes building fees, payroll, human resources, legal, administration, and other costs that provide ancillary support for stormwater activities.
- Include applicable costs from all departments that are responsible for actions required under the permit.
- If you are relying on another entity to meet certain permit requirements, include the costs from that entity as well.
- Do not include stormwater conveyance costs, only include permit compliance costs.
- Do not double count costs. If compliance actions are combined so that it is not possible to split out one from another, only count the costs once and provide an explanation. For example, if training for O&M is combined with training for IDDE, count the cost once under either IDDE or O&M and provide an explanation.
- Provide information about assumptions and data limitations as necessary.

Instructions for cost reporting for specific program components

Education and Outreach

The cost of developing and disseminating public education and outreach materials should be tracked, including staff time, contracts, printing, television, radio or other advertising costs.

Public Involvement

Costs of posting plans and reports, including legal notices in newspapers, should be tracked as well as costs associated copies and requests for stormwater documents.

The costs in this category are for stormwater staff costs that could not be allocated to the other cost categories. It includes costs associated with development and oversight of the entire stormwater program. Also, costs for management plans, NPDES fees, reporting, mail, legal support, travel, conferences, printing, producing manuals and handbooks, and other non-labor costs are included that could not be allocated. Normalization for this category is not practical because of the wide variety of activities, and because very few of these activities can be numerically quantified.

Illicit Discharge Detection and Elimination

For the IDDE program, the cost of inspections for illicit connections and discharges to the stormwater drainage system and the number of inspections should be tracked. Like construction, it is difficult to account for stormwater costs because many activities performed by inspectors serve other purposes, such as inspection of the sanitary sewer system. The cost of responding to illicit discharges, both illicit connections and spills, should be included.

Cost of training provided to inspectors should be tracked, including the cost for the participating inspectors to attend the training. The number of person-hours trained should be tracked for stormwater staff inspectors in order to effectively allocate overhead cost.

The cost of developing required maps, both field surveys and producing maps, should be reported.

Controlling Runoff

Cost of stormwater inspections at construction sites, the number of inspections performed, and the number of active construction sites should be tracked. Only inspections should be tracked when stormwater issues are being addressed by a part of the inspection. It is suspected that some building inspectors still count inspections toward stormwater for latter phases of projects, such as interior building work, that has little impact on stormwater. This should be avoided.

Cost of training provided to inspectors and contractors should be tracked, including the cost for the participating inspectors to attend the training. The number of person-hours trained should be tracked for stormwater staff inspectors because the city must pay for each city staff member attending training. For contractor training, the number of training hours provided (regardless of group size) should be reported because the cities do not pay for the contractors to attend as they do for city staff.

The cost of planning, design and construction of structural controls should be reported.

For the source control program, the cost of inspections should be tracked as well as the number of industrial and commercial facilities. Also, the cost of training provided to inspectors should be tracked, including the cost for the participating inspectors to attend the training. The number of person-hours trained should be tracked for stormwater staff inspectors.

Pollution Prevention and Operation and Maintenance

For this program, the cost for inspecting and cleaning stormwater treatment and flow control BMPs owned or operated by the permittee along with their associated activity statistics (e.g. lbs. of debris removed) should be tracked. Also, the cost for drain line and channel cleaning, pump station cleaning, and similar activities should be tracked.

The cost of inspections of stormwater treatment and flow control BMPs regulated by the permittee and the number of inspections should be tracked.

This program also includes permittees costs for source control activities relating to pet waste collection, automobile maintenance, vehicle washing, illegal dumping control, landscaping and lawn care, pest control, parking lot and street cleaning, roadway and bridge maintenance, storm drain system cleaning, and alternative discharge options for chlorinated water.

Costs for materials management would include alternative products, hazardous materials storage, road salt application and storage, used oil recycling, and materials management.

Monitoring

Only include costs of monitoring associated with on-going water quality studies, illicit discharge and TMDLs.

Part III. Cover page and copies