

Recommendations for Regional Stormwater Monitoring

October 17, 2012

- Decision
 Discussion
 Information

SUBJECT: SOURCE IDENTIFICATION INFORMATION REPOSITORY (SIDIR)

ISSUE: RECOMMENDED NEXT STEPS

BACKGROUND:

What monitoring and assessment information is needed and why?

To create SIDIR as envisioned in our 2010 Strategy and *Recommendations for Municipal Stormwater Permit Monitoring* we need to build on the work currently being done by King County and Herrera Consultants to produce an Illicit Discharge Detection and Elimination (IDDE) Field Screening Manual.

Who was involved in the Subgroup, and how were decisions made?

These specific recommendations were developed at the October 3 subgroup meeting attended by co-chairs Mindy Fohn (Kitsap Co) and Dana de Leon (Tacoma), SWG staff Karen Dinicola (ECY), and subgroup members Louise Kulzer (Seattle), Shayne Cothorn (WDNR), Chris Gustafson (WSDOT), and Brian Penttila (PPRC).

Where are we in the SWG approval process, and when are decisions needed?

These are recommended next steps for creating SIDIR and making progress in advance of permittee contributions. Once the recommendations are approved subgroup members can gather the information needed to identify and articulate the gaps and then set priorities within each category of information.

How and when are recommendations envisioned to be implemented?

Information can be gathered over the next few months, priorities set next spring, and RFPs developed before July 2013. The process to develop a voluntary IDDE reporting form might take a few months longer depending upon availability of technical assistance.

What are the funding implications?

SWG staff and subgroup members will perform the work to identify and prioritize the SIDIR components to be developed and make recommendations as to what kind of expertise is needed to develop each product. Funding to develop the products will come from permittee contributions or from other sources that might be identified (*i.e.*, Ecology GROSS grants).

ALTERNATIVES CONSIDERED:

The draft report by Valerie Monsey was reviewed by subgroup members and dismissed as not relevant to moving forward to create SIDIR. The subgroup was hoping we would be further along at this point but is ready to move on. The subgroup had an open brainstorming session on October 3, 2012 and included all the ideas into a new framework for moving forward.

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REASONING:

Lots of good IDDE work is currently being done by permittees. While some permittees have very mature programs there are many permittees who need help in just about every area of IDDE. We are now at a stage where it makes sense to pick the brains of the experts and not try to be all things to all permittees. The current work being done by King Co and Herrera to develop an IDDE Field Screening Manual has involved public workshops where information about different approaches has been exchanged. They have done a good job of setting sideboards on the project at the same time they have identified and recognized additional needs that SIDIR is appropriate for meeting.

RECOMMENDATIONS (expected to be approved by the SWG on 11/14/12)

By consensus, the SWG Source Identification Subgroup recommends:

1. SIDIR should build on the IDDE Field Screening Manual currently under development by King County and Herrera under a GROSS grant from Ecology.
 - a. The field screening manual is envisioned to include some limited methods for identifying a pollution source once discovered during field screening.
 - b. The field screening manual is not envisioned to include the most commonly used methods for eliminating a pollution source once it is identified.
2. SIDIR should include additional methods for identifying pollution sources that are identified during field screening.
 - a. SIDIR should collect and share information about case studies for both identification and elimination of sources.
3. SIDIR should include methods for eliminating sources that have been identified.
4. SIDIR should collect data to support opportunities for regional solutions to sources of pollution. Specifically, we should explore:
 - a. Common urban landscape activities ranging from big box stores to drive-in restaurants to charity car washes.
 - b. Categories of pollutants that are ubiquitous and cannot be reduced to acceptable levels using existing source identification and removal methods.
5. SIDIR should collect source removal data to quantify the amount of pollutants removed from stormwater.

BACKGROUND

Stormwater management programs include activities to detect, identify, and eliminate illicit discharges into or from the municipal separate storm sewer system (MS4). Permittees are at varying stages in developing their programs, and information sharing is needed to increase efficiency and effectiveness of future work. When all permittees achieve mature and effective programs, there will remain pollution sources that local governments cannot reasonably address; we must seek regional solutions to these sources.

The SWG Source Identification Subgroup includes permittees, state agencies, environmental groups, academics, and consultants. Joel Baker and Kurt Marx of UW Tacoma wrote a scoping memo approved by the SWG in February 2012 that remains a useful guidance document. The

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subcommittee is working to gather specific information and develop recommendations to inform the content and next steps in creating SIDIR.

Status of current knowledge and efforts to monitor and assess this topic.

- Permittees will be required beginning in 2015 to make detailed, comprehensive reports to Ecology about their IDDE efforts. No format is specified, and the reporting is likely to be in widely varying forms with substantial variation in content and descriptive terminology. The subgroup would like to identify specific content needs to inform the development of a reporting form that permittees could use on a voluntary basis during this permit term.
 - The UW report was intended to provide a literature review and findings from interviews with local government staff to identify possible beginning content areas but focused mainly on the format of a web-based product. The literature review syntheses underway for the SWG Effectiveness Subgroup and for the IDDE Guidance Manual may provide additional insight.
- The IDDE activities that SIDIR addresses are being conducted now, but there is not an established forum or mechanism for sharing information, or for querying the results of permittees' activities to identify common threads of information that should be reviewed and analyzed regionally.
- The proposed recommendations fit into SWAMPPS by developing one of the four primary categories of monitoring, and fine-tuning what the muni-permit funds will be spent on. The recommendations also build on the June 2010 strategy discussion of how and where to prioritize source identification and diagnostic monitoring efforts.
- These recommendations complement the Agricultural Runoff Subgroup's recommendations.

SUPPORTING DETAILS

- For these immediate next steps we intend to use monkey surveys, phone calls, and targeted email requests for feedback.
- Subsequent memos and recommendations to the SWG will be documented in official meeting summaries.

IMPLEMENTATION: ROLES AND RESPONSIBILITIES, AND COST ESTIMATES

- The expected timing and sequencing for implementing the recommendations is as follows: SWG staff and subgroup members will perform the work over the next several months to identify and prioritize the SIDIR components to be developed and make recommendations as to what kind of expertise is needed to develop each product. After August 2014 the funding to develop the products will come from permittee contributions; RFPs should be developed as early as possible, preferably before the permit is effective in August 2013. Some products might be developed in advance of permittees' contributions if funded by other sources (*i.e.*, Ecology GROSS grants).

REFERENCES

- "Scoping memo" by Joel Baker and Kurt Marx approved by SWG on February 15, 2012
- King County proposal to develop an IDDE Field Screening Manual January 24, 2012
- "IDDE Project Report" to Ecology by Alice Opalka dated August 16, 2010