



SIDIR Subgroup Meeting Notes

Tuesday, December 15, 2015, 10am-12pm

USGS, 934 Broadway, Tacoma 98402

A list of acronyms is at the end of this document. Action items are noted in yellow highlight.

Attending: Todd Hunsdorfer (King Co), Greg Vigoren (Lakewood), Abby Barnes (WDNR), James Packman (Cardno), Nat Kale (Ecology), Brandi Lubliner (RSMP Coordinator), Karen Dinicola (SWG staff), Rick Moore (GeoEngineers), Blair Scott (King Co)

On the phone: Ryaen-Marie Tuomisto (Kirkland), Kim Benedict (Lacey), Kristen Robbins (Cardno)

Background

Karen reviewed the origin and evolution of SIDIR. “Diagnostic Monitoring” was one of the 4 key components of the Stormwater Assessment and Monitoring Strategy for Puget Sound recommended by the SWG in 2010, the others being status and trends, effectiveness studies, and research. Permittees with more developed IDDE programs wanted to have a way to help smaller, connected MS4s successfully implement their IDDE programs. Other stakeholders wanted to know what the most common problems were, to see if the region could help permittees address those issues.

Ecology used EPA/NEP funds for a “scoping memo” and literature review which resulted in SIDIR being described as providing two separate but connected types of information: a library of **Methods and Resources** for IDDE and source control to help local governments use the most effective strategies and actions for reducing stormwater pollution; and analysis the **Results and Findings** of IDDE and source control programs to identify common stormwater problems that could be supported or better addressed by regional efforts such as education, training, new BMPs, additional regulation, product replacement initiatives, legacy pollutant removal, improved source tracing tools, etc.

SIDIR was envisioned to be supported by NPDES permittees, GROSS grants, and other sources of funding. The online form developed by this subgroup and the permit managers in 2013 was an interim tool to bridge annual reports to the results and findings. The subgroup wanted a consultant to be ready to compile these data as soon as the permittees’ March 2015 annual reports came in. The RSMP Coordinator first focused on getting the status and trends monitoring and effectiveness studies. The project on today’s agenda is a single task added to Lakewood’s broader Source Control effectiveness study. It began in July and is funded out of the SIDIR account, not effectiveness studies. Meanwhile, Karen has been contacted by numerous local jurisdictions asking for the results of this project with interests ranging from targeting their public outreach efforts to tracking mobile businesses that may be repeat offenders in other jurisdictions.

Initial findings of compilation of permittees’ IDDE tracking data in PARIS

Today we discussed the first deliverable of the Lakewood/Cardno SIDIR project task, a compilation of IDDE meta data describing what info was provided in what formats. James went through the draft memo and led the subgroup’s discussion. The subgroup liked the report, appreciates the goals of SIDIR, and agreed that the project should move forward with the database development, population, and subsequent analyses. The subgroup advised James as to how to make the next phase of the project most useful for informing Ecology and the permittees about future permit requirements and improvement of IDDE and source control program implementation. Below are issues, concerns, and advice offered by subgroup members during the discussion:

Overall impressions of/from the dataset:

- Descriptive information, not numeric/quantitative.



- One permittee each in Phase I and II reported way more incidents than the others.
 - Different ways permittees interpret “incident” are likely influencing these numbers.
 - Program maturity and database setup also influencing, though 1 Phase I submitted a narrative.
- Reports were provided in many different ways ranging from database output to narrative paragraphs.
 - The jurisdictions with the most incidents did submit tables; lots of the pdfs are spreadsheets.
 - Permit managers are willing to help James get info from permittees in spreadsheet format.
 - We knew the info would come in various formats, best we could do was ask for consistency.
 - Need next steps to dive in and make recommendations.
- Lots of spills of oil/gasoline/fuel/lubricants in small quantities (many words for same type of issue)
 - Implication: in some jurisdictions it might make more sense to focus on police/fire/tow truck operator education and training than on construction inspections.
 - How much spilled and how much kept out of receiving waters: two separate questions.
- Cannot identify methods for all incidents – not always given in the summary.
- The analyses will need to be carefully designed and many findings caveated to reflect the wide variety in reporting.

Development and population of the database:

- Ecology has an intern to assist with the increased number of incidents to be hand-entered, so there will not be a need for a budget increase.
- Recommendation is to read through the permittees’ reports and identify what data fields to populate. The development of database fields might be an iterative process as the consultants explore the data further. Starting with recommendations on pp. 15-16.
- If ultimate goal is a regional repository, what data fields are of most interest and how are they defined?
 - Identify methods used – and time to resolution for certain types of incidents using various approaches
 - How can we best identify priorities for IDDE effectiveness studies from the analysis?
 - Quantification of spills – category approach is good (recommendations on p. 12 and p. 15)
 - Actual pollutants?
 - Biggest sources
 - Repeat offenders – Business name and UBI
 - **Subgroup members** should look at Table 5 and add ideas about what fields should be checked in the third column
- Subgroup wants James to identify what fields are reported by most/all permittees
- The write-up of the analyses will be valuable for the permittees, particularly if it is clear how the findings and recommendations might influence future permit requirements.

Clarifications:

- The middle column of Table 5 will be replaced with the “SIDIR focus” fields listed in the online form instructions. The instructions will be added as another appendix to the report.
- The numbers of incidents reported in questions 19-20, 47-48 can go both ways depending on how the permittee interpreted the question and provided the information. Number of incidents resolved should be less than or equal to number of incidents reported.
- Extra line in the middle of Table 6 is confusing.

Future IDDE Incident Tracking Report Form:



STORMWATER WORK GROUP

<http://www.ecy.wa.gov/programs/wq/psmonitoring/swworkgroup.html>

- The requirement to report is expected to continue into future permits; the information and format should be clearly defined.
 - Make it as simple/easy as possible.
 - Lessen the burden on the permittees while increasing the utility and meaningfulness of the database.
 - Any required reporting of IDDE incidents should suffice for the Annual Report submittal.
 - Standardize the data request before asking for more info. Identify key fields. Help permittees to interpret the permit reporting requirements in a consistent way.
- A clear definition of “incident” is needed. Some permittees only reported on their G3 reported incidents. For some jurisdictions, reporting all incidents they responded to would be a large increase in effort.
- Try not to make prescriptive recordkeeping requirements, nor to ask permittees to change their databases.
 - Permittees with their own databases should be able to easily extract the required information, as via a script. Targeted, evolutionary tweaks to support information sharing and internal adaptive management of their stormwater management programs are okay/appreciated.
 - Goal is to give everyone a way to inform Ecology what permit requirements work best.
- Could the ultimate “new form” for reporting on IDDE incidents automatically populate ERTS and save permittees a step?

Next steps

- James will take today’s input, revise/finalize the memo, and begin the next phase of the project once Brandi gives Greg the green light. **Subgroup members** who wish to provide additional comments are asked to send them to James within one week from today.
- The subgroup will next meet in a couple of months between the database development and the subsequent analysis. At this meeting we will develop specific questions to guide the analysis. **Karen and James** will talk about the schedule in January, after James has had a chance to begin the next steps and get a better idea of the timeline for populating the database. Karen will send a doodle poll out in January.

Acronyms:

Environmental Response Tracking System (ERTS)
(Permit) General Condition number 3 (G3)
Illicit Discharge Detection and Elimination (IDDE)
Municipal Separate Storm Sewer System (MS4)
Permit and Reporting Information System (PARIS)
Regional Stormwater Monitoring Program (RSMP)
Source Identification Information Repository (SIDIR)
Stormwater Work Group (SWG)
Universal Business Identifier (UBI)
Washington Dept. of Natural Resources (WDNR)