

## How to use the IDDE Incident Tracking Form

*(A draft Ecology guidance document to explain the connection between S5 requirements, the AR question, and the form.)*

**Purpose:** The purpose of this form is to:

- Gather incident-specific information about permit compliance for illicit discharges, and
- Help permittees understand how to respond to the annual report question that asks permittees to provide incident-specific information about illicit discharges, and
- Provide optional information to help identify regional patterns in illicit discharges and successful methods for detecting and addressing illicit discharges, and
- Provide a framework for consistent, minimum reporting that supports data entry and analysis.

**Background:** Phase I permittees and Phase II Municipal stormwater permittees in Western Washington are required to provide incident-specific information about illicit discharges in their annual reports (see Phase II annual report question 20; Phase I questions 36 and 48; and Phase I Ports question 13). The first required report will cover the 2014 calendar year and is due March 31, 2015. Ecology's permit managers will use the required information to assess compliance with permit requirements.

Most of the required information and all of the optional information will be included as part of the Source Identification Information Repository (SIDIR, permit condition S8.D) and used to identify the most common types and sources of illicit discharges responded to by permittees and to help identify trends and patterns. The results and findings of SIDIR analyses will be used to prioritize problems that can be addressed with additional resources, more training or regulatory oversight, or other solutions.

Permittees are required to respond to the annual report question and provide incident-specific information about illicit discharges to their systems. Use of this form to meet the permit-required illicit discharge compliance reporting and to provide optional information to inform SIDIR is voluntary. This form will help you understand how to respond to the annual report question by identifying which information is required to be submitted.

While this form might be all that is needed to document and report to Ecology your IDDE investigation, response, and resolution for a simple problem, it is unlikely to meet all of your needs for documenting more complicated situations, particularly if enforcement is necessary. The form provides a framework for consistent, minimum reporting that supports data entry and analysis.

### **Instructions and explanation:**

#### **Field 1: Jurisdiction name (required).**

Use the same variation in the spelling, capitalization, or abbreviation of your jurisdiction (permittee) name for each incident you report.

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### **Field 2: Unique identifier (required).**

Provide a number unique to this incident within your jurisdiction for the reporting year. You may use a work order number or an ERTS number. The unique number may be auto-generated or manually assigned. Numbering may be continual or restarted each calendar (reporting) year.

### **Field 3: Date incident was reported (required).**

This information will be used to analyze seasonal variation in types and location of problems.

### **Field 4: Weather condition at time of report (optional).**

This information will be used to analyze variation in conditions under which various types and locations of problems occur or are discovered. You may use approximate numbers or estimates for both the temperature and the amount of rainfall in the previous 24 hours.

### **Field 5: Frequency (required).**

Choose one of the options. If you choose “other,” provide an explanation in Field 16. This field will inform understanding of what types of problems jurisdictions are most commonly responding to over time, i.e., are fewer of the incidents ongoing and a greater proportion spills? Your permit manager will review this field with Field 6: Threat determination and G3 notification.

### **Field 6: Threat determination and G3 notification (required).**

Answering the question, “Constituted a threat to human health or the environment?” is required by permit condition Phase I S5.C.8.d.iv and G3, and Phase II S5.C.3.d.iv and G3. Provide documentation of any delay in Field 16. If G3 notification is required, check that it was done or provide an explanation in Field 16.

### **Field 7: Address or nearest intersection (optional).**

This information will be helpful for mapping incidents to identify geographic clusters of various problems. If you prefer not to provide the entire address, please consider providing the zip code. You may use this field to help update your required system maps.

### **Field 8: Incident response timeline (required).**

This information is for permit compliance. Your permit manager will review your responses to assess your performance of the permit-required tasks and timelines. If investigation or resolution was delayed, the reason for the delay must be documented. Provide documentation of any delay in Field 16. If referred, include in Field 16 the name of the entity to which you referred the incident.

### **Field 9: How did you learn about the problem? (optional).**

Check all that apply. Information about how you learned about the problem will be valuable for understanding what methods are most used and useful.

### **Field 10: Source tracing method(s) (required).**

Check all that apply. This list of source tracing methods is taken from the IDDE field screening

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manual at [http://www.wastormwatercenter.org/file\\_viewer.php?id=945](http://www.wastormwatercenter.org/file_viewer.php?id=945). If you use other methods explain your approach in Field 16.

### **Field 11: Indicator testing (optional).**

Sharing what indicators you used to identify the problem will be valuable for understanding what indicators are most used and useful. If you wish to include field results or specific indicator values in Field 16 you may, but they will not be included in the SIDIR analysis. If you use other indicators, explain in Field 16. This list of indicators is taken from the IDDE field screening manual at [http://www.wastormwatercenter.org/file\\_viewer.php?id=945](http://www.wastormwatercenter.org/file_viewer.php?id=945).

### **Field 12: Pollutant(s) identified (required).**

Check all that apply. If the problem cannot be described using the list provided, explain in Field 16.

### **Field 13: Source or cause (required).**

Check all that apply. If the source cannot be described using the list provided, explain in Field 16. For commercial and industrial sources, provide additional, more detailed information about the activity in Field 16. More specific information will support better analysis of the information to prioritize activities for adaptive management. If more specific information is not provided in Field 16, we may follow up with a request for additional information.

### **Field 14: Correction and elimination method(s) (required).**

Check all that apply. If your approach cannot be described using the list provided, explain in Field 16. Information about the methods used to eliminate the source or otherwise resolve the problem will be valuable to help understand what methods are most used and useful.

### **Field 15: Resolution date (required).**

The time elapsed between the report and resolution dates and will be used to analyze variation in the length of time required to address various types of problems.

### **Field 16: Field notes, explanations, and other comments (required).**

Provide documentation of any delay in response or resolution in this field. Explain any required response labeled "other" in this field. If you have no notes to add, do not leave the field blank; write 'N/A' or 'None'. Optional: This field may also be used to include any other helpful or relevant information about the response, investigation, and resolution process. If you can estimate the amount of pollutant in pounds or discharge in gallons that was eliminated as a result of your IDDE actions, please include it here.

Additional questions about this form should be directed to your permit manager.