

**Letter of Intent to
Submit an NPDES Effectiveness Study Proposal**

All fields must be completed

1. Proposed Study Title: Source Control Inspection Evaluation

2. Short Description of Proposed Study:

SPU will conduct a source control inspection evaluation to determine how long source control requirements/BMPs are implemented following a visit from a municipal inspector. The outcome of this evaluation is information on how long businesses remember and implement source control requirements/BMPs following an inspection. This information will build upon the current Lakewood study and help determine the frequency that business inspections should be conducted to maximize the effectiveness of source control.

2. What specific Stormwater Management Program condition(s) or other permit condition(s) in the NPDES W. WA. Phase I and/or Phase II Municipal Stormwater Permit does your study address?

Phase I Permit: S5.C.7.b.

Phase II Permit:

3. How will this study inform, assess effectiveness and/or support implementation of the specified NPDES permit conditions (e.g., project goal) and future permit conditions?

The current Permit requires Phase I Municipalities to inspect 20% of "sites" annually to assure BMP effectiveness and compliance with source control requirements. This requirement is implemented by permittees by visiting businesses to educate them about source control requirements and use enforcement authority if source control violations are observed. This study will evaluate how effective business inspections are at getting businesses to implement source control BMPs.

4. What are the anticipated measurable outcomes or deliverables of this proposed study?

This evaluation would be conducted using survey of a statistically valid number of businesses that have received a source control inspection. The survey would ask questions to determine if the business the business was still implementing the source control requirements/BMPs. Businesses would be stratified into groups based upon length of time since inspection and separated by SIC codes to identify if there are differences between business types and length of implementation.

5. How does this study advance regional understanding for stormwater management?

The proposed study is in line with the RSMP list of effectiveness study topics and potential questions. The study will help answer the effectiveness study topic questions: Which required BMPs were implemented based upon follow up inspection? Which optional BMPs were installed based upon follow up inspection? What were the primary barriers to not adopting or installing BMPs?

6. Applicant(s) Contact Information:

Name: Kevin Buckley & Ellen Stewart

Organization: Seattle Public Utilities

Phone: 206-733-9195

Email: kevin.buckley@seattle.gov

7. Permittees you are coordinating with (Provide contact information):

Dana B. de Leon, P.E.

City of Tacoma, Environmental Services - Science and Engineering

ddeleon@cityoftacoma.org

8. Select Stormwater Work Group study category (select all that apply):

- | | | |
|--|------------------------------------|---|
| <input checked="" type="checkbox"/> Source Control | <input type="checkbox"/> Retrofits | <input type="checkbox"/> Education & Outreach |
| <input type="checkbox"/> LID | <input type="checkbox"/> O&M | <input type="checkbox"/> Other: |

Submit LOI to Brandi Lubliner (WA Department of Ecology) via email at Brandi.Lubliner@ecy.wa.gov