

Technical Advisory Committee
Stormwater Source Control
Regional Data Assessment

Friday, 9 October 2015, 11 am to 1 pm
Lakewood City Hall, Conference Room 3A, 6000 Main St., Lakewood, WA 98499

Call-in number: 253-983-7863

AGENDA

1. Welcome and Introduction – 11:00-11:15
 - Why are we here?
 - Introductions.
 - Lunch, bathrooms, emergency.
 - Introductory comments from Ecology.

2. Comments and Discussion on draft *Data Analysis Plan and Study Design* – 11:15-11:45

5-minute break

3. Comments and Discussion on draft *Survey and Data Request* – 11:50-12:20

4. Next Steps, Next TAC Meeting – 12:20-12:40
 - *Finalize *Survey and Data Request* and send to permittees.
 - Receive, organize, and review data from permittees.
 - *Compile survey results and raw data files. Prepare spreadsheet database of survey results.
 - *Finalize *Data Analysis Plan and Study Design* based on available data.
 - *Prepare data for database and create Access database.
 - Prepare data for analysis.
 - *Write draft *technical memo* to summarize data condition, the database, the final data analysis procedures planned, and any issues encountered.
 - TAC review draft *technical memo* and have next meeting in approximately February 2016.

(* refers to project deliverable)

5. Adjourn – 12:45

Stormwater Source Control
Effectiveness Study
Ecology RSMP

Technical Advisory Committee Meeting
10/9/15, 11 AM – 1 PM, Lakewood City Hall

MINUTES

ATTENDEES

Name	Organization
Chris Vanhoof	City of Bellevue
Sylvia Graham*	City of Bellingham
Jane Dewell	Ecology Local Source Control Program
Brandi Lubliner*	Ecology RSMP
Cynthia Hickey	King County
Mindy Fohn	Kitsap County
Greg Vigoren	City of Lakewood
Diana Halar	City of Lakewood
Zack Holt*	City of Port Orchard
Ellen Stewart	City of Seattle
Brian Robinson	City of Seattle
Bill Leif	Snohomish County
Lisa Rozmyn	Washington Stormwater Center
Aaron Copado	Washington Stormwater Center
James Packman	Cardno consultants
Tamre Cardoso*	Cardno consultants
Kristan Robbins*	Cardno consultants

* by phone

Committee member not able to attend: Dana Zlateff, City of Issaquah

1. Welcome and Introduction

MAJOR DISCUSSION ITEMS

- Round table introductions were made.
- Instructions were provided by Lakewood for lunch options, bathroom location, and where to go in case of emergency.
- Brandi from Ecology provided some introductory comments:
 - The Source Control effectiveness study was ranked 3rd indicating a high interest by the NDPES jurisdictions who participated in the selection process.
 - The liaison to Ecology for this effectiveness study is Mindy Fohn from Kitsap County. The intent of the liaison is to provide a feedback mechanism to Ecology.
 - Most effectiveness studies have an advisory committee and/or a liaison to Ecology.

2. Comments and Discussion on draft *Data Analysis Plan and Study Design*

MAJOR DISCUSSION ITEMS

- More specific objective(s) are needed that relate to the data analysis, not just the intent of the study.
- The Introduction should be more robust, including the NPDES permit requirements (for both Phase Is and Phase IIs) and acknowledging that there is a range of efforts by permittees. The reasons or potential reasons why some jurisdictions go above and beyond the permit requirements should be discussed in the introduction.
- This study covers a portion of properties - private commercial properties - that contribute to the MS4.
- Move the effectiveness questions to the introduction. The questions are the goal and the objectives are the tasks – what will be done to address the questions.
- It's good that the process will include flexibility to adjust the data analysis plan since we don't know exactly what data are available yet.
- Different permit sections among the different municipal permits should be addressed separately.
- Some permittees expressed concern about the availability of data across different divisions and programs. Some data are just in paper files, and data storage method is tied to permit requirements (i.e. doesn't require a digital database, per se).
- The question was asked if the source control effectiveness questions can be revised.
 - The liaison to Ecology strongly suggested we revise the questions to refine them.
 - Need to get Ecology's okay on the revised questions.
 - Brandi noted that the existing questions are central to the project scope and contract that was approved. "Very small" revisions to or interpretations of the questions would be acceptable, for example based on what data are available or focusing on certain types of businesses.
 - Suggestions were made for ways to refine the questions, including:
 - distinguish between drainage facilities (structural BMPs) and operational and behavioral BMPs (non-structural);
 - distinguish between BMPs required for new development versus redevelopment;
 - specifying if questions apply to Phase Is, Phase IIs or both and analyze them separately;
 - expanding the types of contact persons beyond just business owners or property owners.
 - A cautionary statement was made to be careful getting too specific with the question, which could result in either no data provided or requiring too much effort by the jurisdiction to provide the data requested.
- Seattle recently completed a frequency analysis of its own stormwater facility inspection data, which was "outrageously complex." Recommended to find the commonalities among the programs for what data are measured the same ways.

- Ecology Local Source Control (LSC) is probably the best database of non-structural BMPs. Permittees focus on structural BMPs for non-LSC inspections.
- James asked if jurisdictions at the table collect data on the BMPs present, what type they are, if they are “high value”.
 - Seattle uses fault codes to indicate structural vs. non-structural.
 - Bellevue recommends specific BMPs and will note deficiency but does not track their performance specifically.
 - King County recommends BMPs from their stormwater manual.
 - Lakewood notes BMP deficiency and will follow-up, but does not collect data on all BMPs present.
 - Bellingham does not note the BMP category.
 - Snohomish County notes BMPs based on appropriateness of usage.
- James noted that any relevant data would be helpful, regardless of what jurisdiction, or program from which it comes.

ACTION ITEMS

- James requested that the TAC members send him their revisions of how they would like to the effectiveness questions refined and restated. By Friday Oct 16.
- The project team will collect the committee member’s revisions to the effectiveness questions and review them with Ecology. Week of Oct 19.
- The project team will revise the draft *Data Analysis Plan and Study Design* based on the discussion at the meeting, comments sent by email, and input from Ecology. Revised document will be sent to the TAC for a second round of review. Anticipated to be ready the week of Nov 2.

3. Comments and Discussion on draft *Survey and Data Request*

MAJOR DISCUSSION ITEMS

- Discussion occurred regarding what types of programs would have data to contribute, especially restaurant inspections.
 - Restaurant inspections are not part of the NPDES permit for phase IIs.
 - Some jurisdictions perform restaurant inspections through an environmental program and others through a public health program.
 - Some jurisdictions have programs specific for managing fats, oils, and grease (FOG), including resale for reusing cooking oil waste.
 - BMPs for managing cooking oil waste are important for environmental considerations, thus environmental management at restaurants is high value.
 - Include FOG as a program type.
 - Although fire/safety inspections may not have much relevant data, there may be some and it should stay on the list
- The project team’s hope is that one representative from each jurisdiction can help round up relevant data from all programs/divisions within their jurisdiction.
- Include a question asking for a description of the different types of programs.

- An idea was mentioned to collect data from only a subset of permittees rather than an all-call for data from all permittees. This could be done by evaluating initial responses to the survey and deciding if a subset of permittees' data would be appropriate. Decision criteria could include:
 - Jurisdictions that meet the minimum permit requirements versus those who go above and beyond.
 - Inspection program types.
 - Characteristics of inspection program(s).
- Smaller jurisdictions would benefit from more standardization of collection of inspection data.
- A cautionary note was mentioned about receiving data that was collected in a non-standardized way. A current project by Washington Stormwater Center to map stormwater outfalls in Puget Sound included a data request to permittees. Ecology removed some of the specificity from the data request during their review of the data request. Data received has been "all over the map" in terms of formats and quality.
- Add a question about what types of businesses or commercial properties are inspected in order to know which jurisdictions may be relatively more comparable to each other.
- Add a question for what are the drivers for a program aside from permit compliance, such as federal superfund site, TMDL on a certain water body, and budgetary considerations. This may help distinguish why some jurisdictions do more than the permit minimum.
- Discussion occurred on the concept of compliance and enforcement. James asked how jurisdictions represented on the committee define compliance and consider it in the context of follow-up inspections.
 - Snohomish County: based on county code on water pollution control and maintenance of stormwater facilities.
 - Kitsap: Ecology manual, IDDE code (adopted/copied by every jurisdiction as permit requirement).
 - Ecology: as defined by local jurisdictions. For Ecology, 9 priority issues under the hazardous waste regs.
 - Lakewood: depends on BMP type and potential severity of issue. Follow-up return visits to encourage and help business get in compliance, coordinate with departments on related issues (e.g. standing water/mosquitos/West Nile virus).
 - Bellevue and Port Orchard: similar to Lakewood.
 - Bellingham: emphasis on working with businesses, referral to code enforcement as needed.
 - Seattle: progressive enforcement schedule, enforcement by source control staff
- A comment was made about acknowledging potential inconsistency by field inspectors in both collecting data and determining compliance status.

ACTION ITEMS

- James requested that the TAC members send him other ideas for survey questions or ideas about how they would change the question on the draft survey by Friday Oct 16.
- The project team will revise the draft *Survey and Data Request* based on the discussion at the meeting, comments sent by email, and input from Ecology. Revised document will be sent to the TAC for a second round of review. Anticipated to be ready the week of Nov 2.

4. Next Steps, Next TAC Meeting

MAJOR DISCUSSION ITEMS

- Briefly went through the next steps anticipated to finalize the data analysis plan and survey and data request, obtain and review data, and perform the analysis.
- Next meeting of the TAC tentatively planned for February, 2016 to review the draft report of results from the data assessment.