



**Washington State
Department of Transportation**
Paula J. Hammond, P.E.
Secretary of Transportation

Transportation Building
310 Maple Park Avenue SE
Olympia, WA 98504-7300
360-705-7000
TTY: 1-800-833-6388
www.wsdot.wa.gov

February 28, 2011

Mr. Bill Moore
Washington Department of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98504-7600

Dear Mr. Moore:

Enclosed please find a WebDMR Waiver Request Form and supporting materials for your consideration. Included in this package is supplemental information regarding the coverage and justification for this waiver request. This material will be used in the meeting scheduled for March 2, 2011 in which our two agencies will discuss how to move forward with Discharge Monitoring Reporting.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Richard C. Stone', with a smaller signature 'for Ken Stone' written below it.

Kenneth M. Stone
Resource Programs Branch Manager

KMS:ep

Enclosures

cc: Megan White
Day File



Construction Stormwater General Permit WebDMR Waiver Request Form

See
Permit No. attachment

DO NOT ALTER THIS FORM

Permittees with coverage under the Construction Stormwater General Permit must use Ecology's on-line reporting program, WebDMR, to submit discharge monitoring data electronically (Permit Condition S5.B). Permittees who are unable to submit electronically (for example, those who do not have an internet connection) must submit a waiver request to obtain a paper copy DMR form.

Use this form to request a waiver from the requirement to report stormwater monitoring on-line. If your request is approved, you'll receive a paper discharge monitoring report in the mail within one to two weeks. If your request is denied, you'll receive a letter with our decision.

If you need assistance signing up for WebDMR, contact Charles Gilman at WebDMR-Stormwater@ecy.wa.gov. You can also access a detailed set of instructions at www.ecy.wa.gov/programs/wq/stormwater/index.html under the "WebDMRs and PARIS" link, and then select the "More on WebDMR" link on the right hand side of the page.

1. Waiver Request Justification

Describe why you're unable to use WebDMR to report your stormwater monitoring results.
See attachment

2. Certification by Permittee

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Printed Name Kenneth M. Stone	Company WSDOT	Date 2/28/2011
Signature* <i>[Handwritten Signature]</i>	E-mail Address stonek@wsdot.wa.gov	

* Federal regulations require this form to be signed by the following person, or a duly authorized representative:

- A. In the case of corporations, by a principal executive officer of at least the level of vice president.
- B. In the case of a partnership, by a general partner of a partnership.
- C. In the case of sole proprietorship, by the proprietor.
- D. In the case of a municipality, state, federal, or other public facility: by either a principal executive officer or ranking elected official.

A person is a duly authorized representative only if:

- A. The authorization is made in writing by a person described above and submitted to the Ecology.
- B. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

Please return this signed original document to the address below. Make sure you retain a copy for your records.

Washington Department of Ecology
Water Quality Program – WebDMR
PO Box 47696
Olympia, WA 98504-7696

More information is available at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/>.

To ask about the availability of this document in a version for the visually impaired call the Water Quality Program at 360-407-6401. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.

Attachment to WebDMR Walver Request Form

Site Name	Permit
WSDOT CLEAR CREEK RIVERSIDE MIT	WAR012084A
WSDOT I 90 AND SR 520 LAKE WA CONGE	WAR011620A
WSDOT I 90 HIGH POINT/PRESTON PED	WAR011618A
WSDOT I-405 SR 515 I/C PROJECT	WAR010542A
WSDOT I-5 / GRAND MOUND TO MAYTOWN	WAR009709A
WSDOT I-5 BLAINE EXIT	WAR011895A
WSDOT I-5 BLAKE JUN 2 GRAND MOUN	WAR012031A
WSDOT I-5 MARYSVILLE	WAR011130A
WSDOT I-5 MOUNTLAKE TERRACE FREEWAY	WAR010631A
WSDOT I-5 PORT OF TAC- KING CO HOV	WAR011398A
WSDOT I-5 SR 432 TALLEY WAY INTER	WAR011968A
WSDOT I-90 PORT OF ENTRY	WAR011417A
WSDOT I-90 TWO-WAY TRANSIT & HOV OP	WAR006899A
WSDOT I405 NE 8TH ST TO SR 520 RAMP	WAR010895A
WSDOT I405, I 5 TO SR-169 WIDENING	WAR006736A
WSDOT I5/SR 501 RIDGEFIELD IMPROVEM	WAR011172A
WSDOT NSC-SR2 LOWERING	WAR010988A
WSDOT S HOLGATE-S KING ST VIADUCT	WAR011329A
WSDOT SR 11 / I-5	WAR011928A
WSDOT SR 11 CHUCKANUT	WAR012103A
WSDOT SR 16 WB NALLEY VALLEY	WAR010726A
WSDOT SR 160 SR 16 TO LONG LAKE RD	WAR011359A
WSDOT SR 167 8TH ST E TO SB HOT LAN	WAR011280A
WSDOT SR 26 WEST OF OHELLO	WAR011958A
WSDOT SR 27 PINE CREEK BRIDGE REPLA	WAR011849A
WSDOT SR 285 GEORGE SELLAR BRIDGE	WAR011202A
WSDOT SR 395, NSC- US 2	WAR011881A
WSDOT SR 520 TO SR 202 HOV & I/C 3	WAR010906A
WSDOT SR 532 CORRIDOR IMP	WAR011649A
WSDOT SR 542 / CED	WAR012136A
WSDOT SR 542 / GALLUP	WAR012137A
WSDOT SR 9 LUNDEEN	WAR011948A
WSDOT SR 900 - 78TH VIC TO NEWPORT	WAR010497A
WSDOT SR 99 ITS PROJECT	WAR011819A
WSDOT SR16 UNION AVE TO JACKSON AVE	WAR005672B
WSDOT SR305 BJORGEN CREEK FISH PASS	WAR011491A
WSDOT SR410 214TH AVE E-234TH AVE E	WAR011659A
WSDOT SR518 AIRPORT TO I-5/405 I/C	WAR009446A
WSDOT T STREET UTILITIES	WAR012104A
WSDOT US 12 TIETON RIVER BRIDGE REP	WAR011518A
WSDOT US 2 SAFETY IMPROVEMENTS	WAR011947A
WSDOT US 2/97 & 28 INTERSECTION IMP	WAR012030A
WSDOT US HIGHWAY 12 FRENCHTOWN	WAR010109A
WSDOT I-82 VALLEY MALL XL-2938	WAR012239
WSDOT I-5 196th St (SR524) Braided Ramp	WAR012547
WSDOT SR 522 US 2 Interchange Flyover Ramp	WAR012548
WSDOT I-90 Sunset Way Connection I/C Mod	WAR012450
WSDOT SR 529 Ebey Slough Bridge	WAR012559
WSDOT US 2 Stevens Pass Summit	WAR012441
WSDOT 24th St. E. to Milton Way	WAR012354
WA DOT SR 14 CAMAS WASHOUGAL LANES	WAR012274
WA DOT US BLEWETT PASS LANES	WAR012392
WA DOT I-405, NE 116th St Inter/St	WAR124582
WA DOT SR 14 CAPE HORN BRIDGE TO CAPE HORI	WAR012390
WA DOT SR 500 ST JOHNS BLVD	WAR1012401 012 401
WA DOT I-5 SR 161/SR18 Triangle Improv	WAR011823
WA DOT I-5 Downtown Bellingham On/Off Ramps	WAR012534
WA DOT Eastbound Nalley Valley HOV	WAR124644
WA DOT East end George Sellar	WAR124683



Waiver Request Justification

WSDOT has commitments unlike other permittees and has been proactive in meeting and tracking these commitments.

- WSDOT recognized the need to have an effective data management system in place for discharge monitoring data QA/QC needs and for permit compliance tracking and reporting purposes. Prior to the WebDMR program there was no system for reviewing or tracking reported data. WSDOT developed a centralized system that would meet the needs of the agency.
- Internal data systems have been proactively developed by WSDOT to meet increasingly complex stormwater permit monitoring requirements on a statewide level. WSDOT continues to move forward on the commitments it has made to the development of these internal data systems and continues to coordinate efforts with Ecology to develop a batch reporting process in the near future that will meet the needs of both agencies.
- As a public agency, WSDOT has performance measurement reporting commitments to the Governor and legislature that are unlike other permittees, and these commitments have been considered during the development of the internal data management system.
- WSDOT has expended over \$250,000 specifically appropriated to WSDOT by the legislature to develop the Construction Water Quality Monitoring (CWQM) database. It was developed to be able to generate the paper DMRs that have been the practice up to now, and then generate data to be transmitted via batch process to Ecology at such time when Ecology had the system in place to download batched data. The CWQM database has no compatibility with WebDMR. The CWQM was developed with full knowledge and concurrence of Ecology staff.

The Environmental Services Offices (ESO) QA/QC process would not be possible and the quality of data submitted would undoubtedly suffer.

- ESO performs an intensive QA/QC data review in the first two weeks of every month. ESO works to resolve data quality issues in order to ensure data accuracy and completeness. This QA/QC process can continue until the day the Discharge Monitoring Reports (DMRs) are due on the 15th of every month. Given that sampling and reporting isn't a primary responsibility for transportation project staff, there are a number of common issues that we identify and correct monthly to ensure accurate reporting; for example incomplete data, incorrect sampling locations, and missing contingency sampling after an exceedance.

- WSDOT would need to develop a new way of tracking permit compliance. The WebDMR program is not compatible with WSDOT internal compliance tracking mechanisms including our internal compliance notification process and Commitment Tracking System (CTS) database. The CWQM data base is linked to CTS to internally track exceedances, violations and trigger compliance notification process.
- CWQM was developed to meet WSDOT's needs for tracking and reporting data on a statewide level. It appears to be not possible for ESO to track permit compliance with the WebDMR program on a monthly basis (ensuring DMRs are complete, accurate and submitted on time) or on an annual basis (for performance measurement reporting needs).
- The QA/QC process helps ESO identify trends in erosion control preparedness, training needs in the regions, and overall compliance with the permit. Without a centralized internal process, it would be difficult to identify statewide needs for the Construction Site Erosion and Sediment Control course that is provided by ESO, and other tools to maintain compliance with the permit. This training is essential for maintaining the quality sample data collection and reporting procedures that ESO works to promote.

Significant changes in WSDOT reporting procedures would require manuals and other materials to be revised and then revised again when the batch reporting system is deployed.

- Before manuals and guidance could be developed, a new agency wide reporting and tracking plan would need to be developed. WSDOT would be limited in its ability to develop a plan based on the scope of the WebDMR program. Years have been spent developing the current WSDOT reporting and tracking procedures and systems. CWQM itself has been under development for several years at a cost of over \$250,000.
- Highway Runoff Manual revisions would be required and most HRM revisions need to be approved by Ecology. Ecology-approved HRM revisions would require a modification of the WSDOT municipal stormwater permit.
- The Construction Site Erosion and Sediment Control course material would need to be updated resubmitted to Ecology to be approved for use in the WSDOT CESCL certification program.
- Regional project offices manage water quality reporting procedures differently based on office organization and staff availability. Project offices would need to restructure and develop new management methods accordingly.
- The above planning and material revisions would require at least four months to prepare. This effort would need to be performed again before the batch reporting system is deployed (currently planned for deployment in about six months). This amount of effort is not justified by the short time these new WebDMR procedures would be used.

Extra person hours would be required by WSDOT staff.

- WSDOT regional staff would need to spend extra hours being trained in the new reporting procedures as defined by the WebDMR program. This would be inefficient because once the batch reporting system is in place training would be required again.
- CWQM was not developed with the ability to populate the WSDOT database with data from the WebDMR program. CWQM was designed to generate DMRs with data from the WSDOT database entered by project staff. Therefore, to manage and track data submitted to the WebDMR program, ESO would need to manually enter all of the data (already entered into the WebDMR program by regional project staff) into the WSDOT database such that the data could be used for the performance management and reporting purposes noted above, and for WSDOT commitment tracking purposes.
- Updating manuals and guidance as listed above.

Ongoing just-in-time training would need to be available to WSDOT personnel.

- WSDOT staff who report sample data often change. ESO provides immediate assistance to staff who are new to the data management and reporting process. This just-in-time training is sometimes literally just-in-time and done days before DMRs are due.
- Ecology provides training for the WebDMR program but this training is scheduled in advance and will not meet the just-in-time needs of WSDOT staff. Any training provided would need to be available on an ongoing basis and at a statewide level.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

April 28, 2011

Kenneth Stone
Washington State Department of Transportation
310 Maple Park Avenue SE
Olympia, WA 98504-7300

Dear Mr. Stone:

RE: WAWebDMR Waiver Request

The Washington State Department of Ecology (Ecology) has reviewed your WAWebDMR waiver request for all sites covered under the Construction Stormwater General Permit (Permit). Based upon the information provided on the form, we are approving your request.

This approval remains in effect until Ecology finishes developing an online bulk upload capability for WAWebDMR, expected to be complete late 2011. Ecology expects Washington State Department of Transportation will utilize the bulk upload capability for all sites required to report monitoring data under the Permit.

Please ensure that you retain copies of this waiver letter with each site's Stormwater Pollution Prevention Plan (SWPPP), copies of the application, inspection reports, and all other reports required by this permit for at least three years after the date of final stabilization of the construction site. These documents need to be available to Ecology and to the local government agencies with jurisdiction upon request.

If you have any questions regarding this letter, please contact Charles Gilman at (360) 407-6437 or charles.gilman@ecy.wa.gov.

Sincerely,

Bill Moore, P.E.
Program Development Services Section Manager
Water Quality Program

cc: Charles Gilman, Ecology
Stormwater File, Ecology, HQ



