

## Q77 Narrative for City of Enumclaw 2023 Annual Report

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### **Q77 Attach a summary of actions taken to implement the source control program per S5.C.8.B.iii and S5.C.8.b.iv**

- Advised City administration of the future permit source control requirements that need to be planned for and properly funded. Determined that an additional 0.5 FTE was required as part of the Stormwater Utility to support this future program. Established a job description and received approval from administration and city council in the 2022 budget to hire an additional employee. The city filled the new position in 2022 to support creation of the source control program and to start conducting inspections in 2023.
- Establish a business source control inspection tracking and reporting system in the City's asset management program (Cartegraph). The source control inspection and reporting system was used in 2023 to track inspections, actions, outreach, and other permit required source control inspection information.
- Attended permit coordinators meetings to learn about various source control topics of interest and implemented applicable items in the City source control program.
- Reviewed the Business Inspection Group (BIG) source control survey and related content being implemented at other Phase I and Phase II permittees. Saved appropriate templates on potential forms, education and outreach, inspection reports and other related information that will be helpful in any future needed revisions of the city's initial Source Control Inspection Program.
- Coordinated with other jurisdictions on appropriate source control ordinances that needed to be implemented at the City of Enumclaw. Drafted and adopted a source control ordinance requiring the application of source control BMPs for pollutant generating sources associates with existing land uses and activities.
- Advised business owners of source control requirements during IDDE incident response by City staff.
- All staff responsible for implementing the source control program have attended source control training put on by Herrera Environmental and the Washington Stormwater Center.
- Established the City's initial source control potential pollution generating business list. These businesses were identified primarily through evaluation of the city's business licenses list and associated business NAIC codes against Appendix 8 of the permit and TMDL required NAIC codes. Additional businesses were added through use of Google Maps to find and evaluate other businesses located within the city but for which didn't have a business license or listed the wrong NAICS code. Applicable City owned or operated facilities were also included. The initial list of 200 businesses was increased to 207 business in 2023 do to addition of some more routine mobile businesses who operate inside the city as well as businesses added do to complaint response. Updates to the list will be performed as needed or required by the permit.
- Created a standard operation procedures for the source control inspection program to ensure consistent, effective, efficient, and transparent inspection and enforcement process and to ultimately reduce the risk of pollution to the MS4 and surface waters.
- Created a flyer which provides education and outreach information on the source control

inspection program, spills reporting information, and typical source control BMPs applicable to most sites. Distributed the flyer via mail and email to all pollution generating businesses on the city's list and provide additional copies of the flyer to businesses during routine business inspections.

- Created templates, posters, and other information that are provided to businesses during source control inspections to assist with fulfillment of various operation source control BMPs (i.e. spill plans, spill training, spill kit supplier info, spill response and storm maintenance contractor list, and the city's associated spill pollution and dumpster lid outreach).
- Incorporated dumpster lid outreach and spill response outreach of the city's behavior change campaign into the source control inspection program and incorporated tracking mechanisms within the source control inspection software (Cartegraph).
- Conducted 52 business source control inspections (including follow-up inspections) at a total of 43 businesses/sites in 2023 to assess BMP effectiveness and compliance with source control requirements. Businesses were selected based on potential for pollution generation, complaint based inspection responses, required TMDL inspections, and at businesses located within the high priority catchment area as a component of the Stormwater Management Action Plan (SMAP) developed under other permit requirements. 100% of sites identified through credible complaints were inspected. Only 1 property owner denied entry to portion of their site. City staff coordinated to inspect 4 sites with both the Ecology Regional Industrial Stormwater Permit Inspector as well as EPA Region 10 surface water enforcement.
- Upon inspection, the City took appropriate follow-up actions as deemed applicable for each site in the form of letters, phone calls, emails, follow-up inspections, and onsite meetings to help bring the site into compliance with required source control BMPs. In 2023, the city was able to rectify all issues within a timely manner without issuing a formal notice of violation on any site. Additionally, no sites were referred to Ecology to assist with non-emergency violations.
- Acquired funding for a structural source control capital improvement project which was identified at the City's of Enumclaw Expo Center. The project extended the sanitary sewer system >400ft to the sites livestock animal wash area to mitigate associated pollutants from animal wash activities from discharging into the storm system. The project has since been constructed.