

Bainbridge Island Annual Report Review

Virtual MS Teams Meeting

TBD

ECY Participants: Roger Chang

Bainbridge Island Participants:

SWMP/Question Review

General

- Check the dates throughout the SWMP.

City Response 6/11/2024: Okay, SWMP was reviewed, but we didn't find any incorrect dates. Was there something in particular you noted for this, Roger?

Mapping

- Q30a – After reviewing the attachment for outfall size and materials, I noticed that there are many that do not have size and material specified on the spreadsheet. Is the City planning to continue to grab this information during this year? The G20 that was submitted last year didn't specify whether this information gathering was part of the staffing issue. If the City plans to continue to gather this information, then this should be noted in the SWMP.

City Response 6/11/2024: This data gap is the result of the lack of staff to conduct mapping and data verification. However, some of this data is in GIS but is currently located in the notes field rather than the correct material or diameter fields, and will be updated at some point soon. The City is still working on hiring a full-time staff person to accomplish map updates and ongoing mapping needs, which will include this. The City has already hired an intern that has begun this work. The G20 notification does state that the new staff person will accomplish on-going mapping needs. The SWMP does note mapping needs and staffing challenges it's planning to overcome this year, but does not specifically state all the work items such as updating the outfalls layer. The SWMP has traditionally not listed specific detailed work tasks.

IDDE

- Make sure that the publication date for the IC/ID manual is the most current.

City Response 6/11/2024: The City understands there was a manual update in 2020, but the City cites the same manual that the current Permit cites: *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2013)*. The City will begin to cite the 2020 *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual*.

- Q35a – Make sure to cite the most current publication date for the IC/ID manual.

*City Response 6/11/2024: City will cite the 2020 *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual*.*

Controlling Runoff

- Q49a – Is the reported number in the annual report of 509 the total number of inspections? Or total number of construction sites?

City Response 6/11/2024: 509 is the total number of sites inspected, the number of inspections would be much higher.

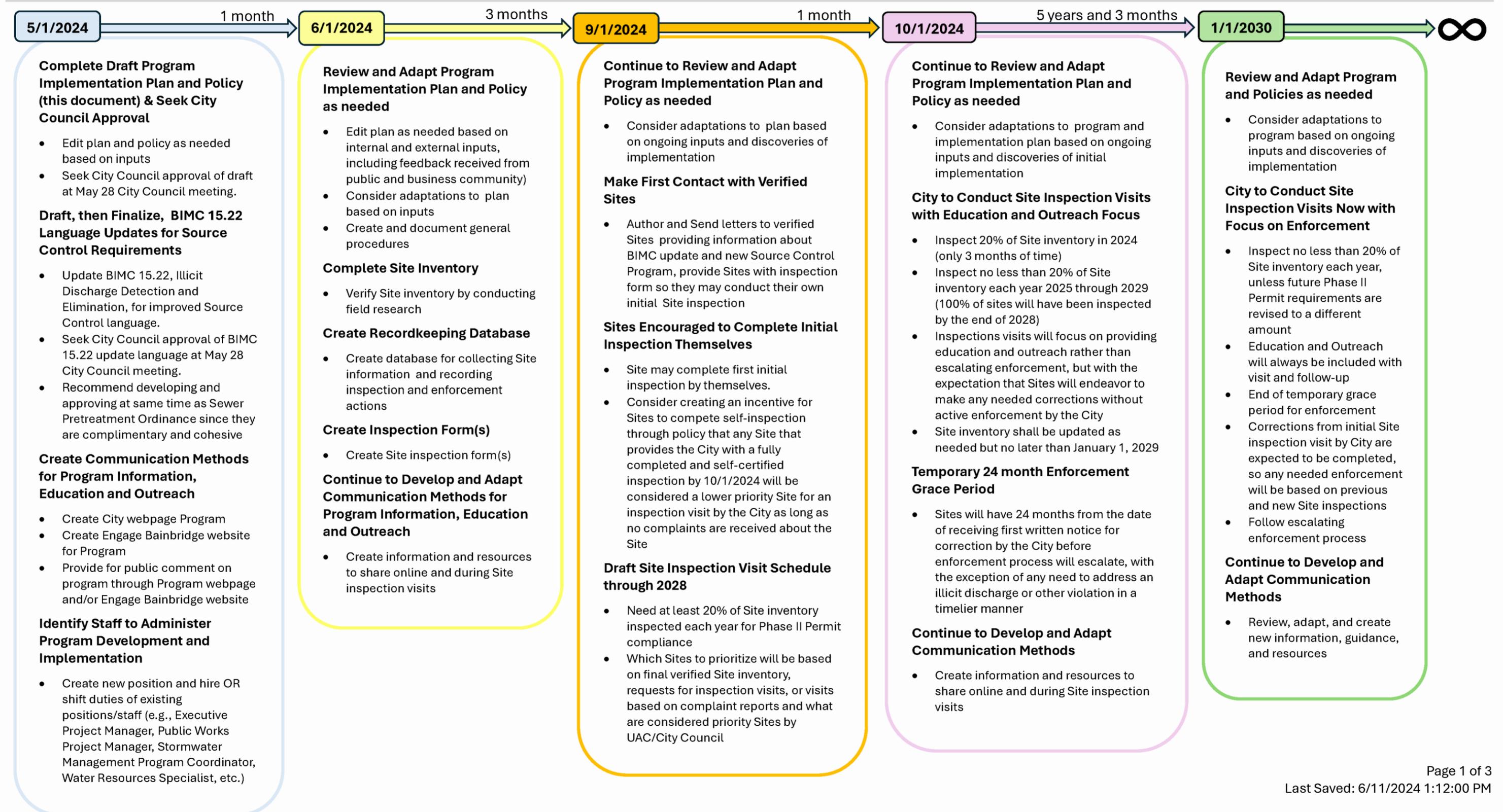
Source Control

- Are there any updates to the City's source control code development and possible staffing hires?

City Response 6/11/2024: 5/28/2024 City Council approved the initial Source Control Program Policy and Implementation Plan and an IDDE ordinance update that added more clarifying language regarding source control. No new staffing updates; for now, existing staff are expected to take on these new duties. The initial Source Control Program Policy and Implementation Plan is attached for your interest.

COBI Source Control Program – Initial Policies and Implementation Plan

Program Development and Implementation Timeline



Program Development and Implementation Policies

❖ Site Inventory

- Sites are individual businesses identified based on [North American Industry Classification System](#) (NAICS) Code as provided with approved COBI business license
- Site inventory is currently only those businesses that are identified by a NAICS Code that is included on the list provided in the Appendix of the [Western Washington Phase II Municipal Stormwater Permit](#)
 - The City can decide to include businesses not included on the list at any time

❖ Site Inspections

- Sites will be asked to complete an initial Site inspection by themselves and they may submit the inspection to the City for the incentive benefit of putting off a Site inspection visit by the City until an otherwise later date, thus extending the timeline for enforcement of any potential needed corrections.
- First Site inspection visits by the City between 10/2024 through 12/2029 will focus on education and outreach with the exception of any need to enforce addressing an illicit discharge or other violation.
- Sites will be prioritized for inspection based on business type, location, complaints, and known or perceived risk to MS4.
 - When the Site inventory is verified, the City will have a clearer understanding of the Sites – and will then work to identify a reasonable prioritization order that will be made public for the public to comment on
- Sites that are not standalone but are part of a larger business complex will be inspected as individual Sites based on their business activities, and the complex will be considered the parent Site and will also be inspected and expected to comply with requirements for the property as well as hold their tenants responsible for compliance of their business activities on their property.
- Between the years of 2024-2029, inspections will focus on these compliance areas, and additions may be made based on inspection results:
 - Following BIMC 8.24 for Disposable Food Service Ware and Waste Reduction
 - Documented Spill Prevention and Response Plans
 - Staff training
 - On-Site spill supplies/kits
 - Site/property sanitary sewer pre-treatment and maintenance, especially for fats, oils, and grease (F.O.G.)
 - Site/property stormwater system maintenance
 - Completely covered dumpster/waste collection areas for protection from coming into contact with precipitation
 - Completely covered hazardous materials and waste storage and disposal areas for protection from coming into contact with precipitation, and secondary containment for protection from leaks or spills
 - Prevent and control runoff and illicit discharges from outside cleaning activities
 - Keep parking areas and business accessways swept and clear of sediment and trash debris
 - Reducing and eliminating the application of pesticides, herbicides, and fertilizers at and around the site.
- Beginning 2030, inspections may begin to also include these compliance areas, and additions may be made based on inspection results:
 - Secondary containment or connection to sanitary sewer for dumpster/waste collection areas
 - Inside cover and secondary containment for hazardous materials and waste storage and disposal areas
 - Prevent and control runoff from hood vent cleaning and other roof cleaning activities
 - Operations and maintenance plans for Site sewer pretreatment system(s)
 - Operations and maintenance plans for Site/property stormwater system
 - Eliminating the application of pesticides, herbicides, and fertilizers at and around the site, unless otherwise authorized by the City, by using preferred natural and organic methods, and products, if necessary.

❖ Enforcement

- Source Control BMPs will be enforced primarily by BIMC 15.22, Illicit Discharges Detection and Elimination, and if necessary, other relevant City codes.
- Site business owners will be considered the primary responsible party for compliance with their business activities.
- Property owners will be considered the primary responsible party for compliance with their property and with any Sites, if any Sites in the Site inventory are located on their property.
- Site business owners and property owners, if they are different, are expected to work together on compliance issues related to the property. Property owners are considered the Parent Site, and are responsible for ensuring business Sites on their property are in compliance.
- Before, January 1, 2030, Sites will have 24 months from the date of receiving first written notice for correction by the City before enforcement process will escalate, with the exception of any need to address an illicit discharge or other violation in a timelier manner.
- After January 1, 2030, Sites will no longer have an extended grace period to make corrections. Sites will receive written notice of correction that will include a reasonable timeframe to complete corrections before enforcement will escalate based on BIMC.

❖ Financial Incentives for Sites

- COBI could consider reducing or eliminating permit cost for needed permits for certain correction activities (e.g., cover for dumpster areas, new connections to sanitary sewer or storm sewer, accessory buildings for materials or waste storage and secondary containment)

❖ **Financial Costs for City**

- Staff and technology to administer the Source Control Program
- Education and outreach materials
- Ongoing additional POTW and MS4 operations and maintenance cost due to the absence of pretreatment and source control by Sites
- If City uses financial incentives for Site there will be cost to the City, but the benefit should outweigh the cost (such as the City will see reductions in cost to operate and maintain POTW and MS4)
- Cost for City to bring City facilities into compliance

❖ **COBI Compliance**

- City will endeavor to be in compliance with corrections by January 2026 to be an example and to learn from the process.
 - Need to inspect City first before any other Site (known already are dumpster/waste areas to be covered as well as Spill Prevention and Response Plans for all Sites)
 - The date of January 2026 provides the City time to plan, budget, schedule, and complete corrections in a reasonable timeframe.
 - If correction process is discovered to be difficult, the City may consider adaptations to ease the process for Sites