

Q58 Narrative for City of Enumclaw 2024 Annual Report

Q58 Attach a summary of actions taken to implement the source control program per S5.C.8.B.iii and S5.C.8.b.iv

- Advise City administration of permit source control requirements that need to be properly funded. Hired a new permanent Engineering Technician who is responsible for managing the source control program and conducting routine source control inspections.
- Established and managed a business source control inspection tracking and reporting system in the City's asset management program (Cartegraph/Open Gov). The source control inspection and reporting system was used in 2024 to track inspections, actions, outreach, and other permit required source control inspection information.
- The city source control inspector attends permit coordinators meetings and BIG meetings to learn about various source control topics of interest and to refine our source control program as deemed appropriate.
- Review source control content available on the Washington Stormwater Center Website. Save appropriate templates, forms, education and outreach, inspection reports and other related information that can be incorporated into the city source control program and inspections.
- Adopted a source control ordinance requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities. Language in the ordinance is consistent with what other Phase II permittees adopted. Enforce ordinance when required.
- Advised business owners of source control requirements during source control inspections and IDDE incident response by City staff.
- All staff responsible for implementing the source control program have attended source control training provided by the Washington Stormwater Center. Additionally, the city source control inspector attended a source control inspection workshop in 2024.
- Established and maintain a 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 are performed as needed and no greater than once every five years.
- Follow 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 and distribute 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.

- Provide businesses with templates, posters, and other information 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/Open Gov).
- Conducted 43 business source control inspections (including follow-up inspections) at a total of 39 businesses/sites in 2024 to assess BMP effectiveness and compliance with source control requirements. This inspection total in 2024 meets the minimum annual 20 percent inspection frequency requirement outlined in the permit. To-date, since the creation of the program, 96 inspections have been conducted at 80 businesses. 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 to-date has denied entry to portion of their site. In 2023, 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 2024, 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.
- Implemented a structural source control capital improvement project at the City of Enumclaw Expo Center in 2024. 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.