



Prepared for Ecology on behalf of the Stormwater Workgroup by King County, Aspect Consulting, & Herrera Environmental Consultants

Study Highlights

- This study helps expand and deepen the source control resources and guidance available for Washington permittees and mobile businesses.
- Permittees can use the software tool to identify mobile businesses of interest to stormwater and use related outreach materials and best practices guidance for municipal source control efforts.

Goal & Background

Some businesses have unique stormwater and pollution prevention challenges due to their mobile nature and working at dispersed sites in multiple jurisdictions. For stormwater permittees who include mobile businesses in their mandated source control efforts, they are faced with how to engage with and inspect businesses that may operate at various locations both within and outside of the permittee's jurisdiction. Regardless of where a business may be legally registered, good stormwater management and source control addresses business activities where they occur.



The overall goal of the study was to provide guidance and tools to help permittees identify, inspect, and coordinate mobile business engagement for municipal stormwater source control activities. Questions included:

- How can permittees identify mobile businesses of interest to stormwater management to include in their source control inventories?
- What are the unique challenges to mobile businesses for pollution prevention?
- What methods and recommended best practices can stormwater managers use to inspect mobile businesses for source control?

Project Findings

The study developed several resources for stormwater permittees to use with mobile businesses in municipal source control programs. The resources were used and tested during the Study in a pilot program in King County. The resources include:

- [Software tool for searching keywords](#) in business licenses lists and identifying likely mobile businesses of interest to stormwater.
- [Best Practices Guidance](#) for municipal source control efforts with mobile businesses.
- Compilation of 27 existing outreach materials for mobile business types and activities from cities in Washington and other states.
- Compilation of 26 best management practices (BMPs) for mobile business types and activities from leading stormwater management manuals in western Washington.

Collectively improving stormwater management

Stormwater Action Monitoring (SAM) is a collaborative, regional stormwater monitoring program that is funded by more than 90 Western Washington cities and counties, the ports of Seattle and Tacoma, and the Washington State Department of Transportation. SAM's goal is to improve stormwater management to reduce pollution, improve water quality, and reduce flooding. We do this by measuring stormwater impacts on the environment and evaluating the effectiveness of stormwater management actions.

- [New outreach brochures](#) developed for three mobile business types: mobile automobile repair; commercial landscaping; and pressure washing.

In addition, the study outcomes included reports, technical memoranda, and presentation slides of task work.

- [Survey of municipal source control programs](#) in Washington state.
- [Analysis of illicit discharge detection and elimination \(IDDE\) data](#), including for mobile business sources.
- [Pilot Program in King County](#) in which 18 permittee cities used and tested the resources developed for the Study and engaged with each other in cross-jurisdiction discussion about source control.
- [Slides](#) and recorded video [presentation](#) of findings and outcomes from the study.

Recommendations

For permittees:

- Use the keyword search software tool developed in the study. The tool searches for keywords in the business’s own description of its services, and the keyword list can be customized by the user.
- Communicate, collaborate, and share information with neighboring jurisdictions about mobile business source control efforts. Consider doing a joint inspection with another jurisdiction of a mobile business that operates in both places.
- Support and encourage municipal staff to include mobile businesses in source control efforts and to work across jurisdictional boundaries.

For Ecology:

- Consider updating Appendix 8 of the municipal stormwater permits. The NAICS codes could be updated to better reflect commercial and industrial activities with risk of stormwater pollution, including mobile businesses.
- Continue to communicate with the Business Licensing Service of the Department of Revenue on how environmental pollution risk can be better captured in business licensing and how a business can indicate they are mobile.



Figure 1: Wash water from cleaning pavement may contain soaps, dirt, oil, grease, toxic chemicals, and heavy metals. Photo credit: Scott McQuary, City of Redmond

What should stormwater managers do with this information?

Some mobile businesses have unique pollution prevention challenges due to their mobile nature. Stormwater permittees are faced with how to identify and inspect mobile businesses that may operate both within and outside of the permittee’s jurisdiction. Good source control efforts address business activities where they occur, and this study helps expand and deepen the resources and guidance available for permittees and mobile businesses in Washington.

What will Ecology do with this information?

The next time the permit is revised, Ecology will review and consider changes to the NAICS codes in Appendix 8 Businesses and Activities that are Potential Sources of Pollutants. Ecology encourages permittees partnering with the Department of Revenue Business Licensing Service for business licensing to add a Mobile Vendor Business endorsement to their application so that mobile businesses can be more easily identified.

For more information, including the final report, see the website at

ecology.wa.gov/sam

To request an ADA accommodation, contact Ecology by phone at 360-407-6600 or email at chelsea.morris@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.