

## 46 – Summary of Source Control Program Actions

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### Summary of Actions (S5.C.8.b.iii):

The City implements a Source Control program (S5.C.8) to reduce pollutants in runoff from areas of existing development that discharge to the MS4. This includes an inspection program for businesses and/or properties identified based on the presence of activities that are pollutant generating. Below is a summary of the City's actions taken in 2021 to implement these source control requirements (S5.C.8.b.iii).

- (1) The City distributes site specific materials and provides technical assistance during inspections. The Seattle Green Business and the relaunched regional Envirostars program also provides stormwater best management practice information during site visits and through their hotline and website. Information of a general nature is provided on social media via Twitter and Facebook and on the City's webpage (S5.C.8.b.iii.(1)).
- (2) In 2021, the City of Seattle conducted 431 source control inspections on properties draining to the MS4 in Seattle. These inspections include initial site inspections, follow up visits and audit inspections. This represents 20.94% of the targeted inventory. Sites are prioritized for inspection based on risk level, which determines inspection frequency (high = 2 yrs, medium = 4 yrs, low = 6 yrs). Risk level is determined by outdoor activity, business type, etc. (S5.C.8.b.iii.(2)).
- (3) All businesses identified through the complaint program received inspections (100%) (S5.C.8.b.iii.(3)).

### Summary of Actions (S5.C.8.b.iv.):

The City implements a progressive policy to require sites to come into compliance with stormwater requirements within a reasonable time period. The progressive enforcement policy includes a corrective action letter and a notice of violation. The violator can also enter into a voluntary compliance agreement. If and when the violation cannot be resolved, the violation may be referred to Ecology for enforcement.

Below is a summary of actions taken in the enforcement progression in 2021 for the Business Inspection Program, the Stormwater Facility Program, the Complaints/Spill Response Program, and the Illicit Discharge Detection and Elimination (IDDE) Program. Records are maintained electronically and kept in a custom database. SPU undertook a data unification project to compile historic inspection records into a new singular inspection database in 2018. This unification project is ongoing. All inspection work conducted in 2021 was conducted utilizing the new database, and records are available electronically. An additional project was conducted in 2021 to improve this system, with inspectors using this new system beginning Dec 14<sup>th</sup>, 2021.

## 2021 Follow Up and Enforcement by Program Type

Program Type	Corrective Action Letter	Second and Final	Notice of Violation	Voluntary Compliance Agreement	Ecology Referral
Business Inspection Program	149 <sup>1</sup>	No Longer Used	2	0	0 <sup>2</sup>
Stormwater Facility Program	100	7	1	0	0
Water Quality Complaints	0*	0	0	0	0
Spill Response	0*	0	5	0	0
IDDE	0	0	1	0	0

<sup>1</sup>An additional 22 letters are also in process.

<sup>2</sup>Ener-G Foods, Herbivore Botanicals, RTW Logistics, and Oola Industries - ISGP Referrals. Edensaw Woods LLC, Culbertson Sign Service – Pollution Prevention Assistance Referral

\*Corrective Actions issued through the follow up business inspection process