

Kitsap County Public Works Stormwater Division

Source Control Program

According to Ecology's draft permit language; "The number of annual inspections is equal to 20% of the business or properties on the inventory list"

In Kitsap County 20% of pollution generating businesses would include about 600 businesses per year. Our stormwater division does not currently have capacity to add this volume of inspections. We could partner with the Local Source Control program implemented by the Health District, however to meet their LSC requirement they inspect 250 businesses per year with 2 FTE. To meet Ecology's proposed new source control permit requirement additional staff from Kitsap County' Stormwater division would need to be hired.

RECOMMENDATION: Reduce the percentage to 10%; allow permittees to report inspections completed by LSC who partner with Stormwater.

How will permittees be expected to document/track and report on business inspections? Will we have to develop our own database or can we use LSC program database?

Does Ecology expect permittees to include all operational and structural BMPs to Code? This seems unrealistic given the limited staff capacity and resources needed for permittees to update/change local code.

RECOMMENDATION: Develop a tiered approach for BMPs; prioritize those BMPs that are most effective and realistic to implement. Use this tiered approach to develop an Ecology functional document and/or checklist to implement BMPs.

What funding opportunities will be available to permittees to implement the components of the program?