

Looking through my notes that I presented to you on the first draft of the business inspection program, I still see several issues that I raised that are not addressed either in the revised program or in your email below.

First I will respond to your responses below.

1) Add all Monterey's "groups"

Actually, Monterey only does restaurant and vehicle/fueling according to their staff.

Can you please provide me with the name and contact information for the individual you spoke with in Monterey? Their SWMP says: "Using the inventory of businesses to be inspected and the inspection checklists contained in the appendix (and these businesses include automotive repair shops and gas stations, restaurants and fast food chains, rental service, automobile and other vehicle body repair or painting, mobile carpet drape or furniture cleaning businesses, painting and coating businesses, landscaping businesses, nursery and greenhouse businesses, businesses subject to EPA Sec. 313 right to know regs, golf courses and parks, cemeteries, equipment repair, maintenance, fueling or cleaning, masonry, pool and fountain cleaning, pest control services), prioritize businesses to be inspected and perform compliance inspections on these businesses to identify illicit connections and discharges. Discharges to Environmentally Sensitive Areas, to Areas of Special Biological Significance, restaurants and fast food chains, auto repair shops and gas stations receive top priority." (BMP 3.3.b)

2) Modify the restaurant inspector's checklist, use Monterey as example

EHS won't modify their checklist; it follows a state-issued format. The checklist does require inspectors to address H&S Code 5411 which prohibits waste discharges.

Please provide a copy of EHS's checklist so that the public and the Regional Water Board may determine whether they are inspecting for the appropriate things. I asked for this the first time we met.

3) Explain background / criteria for establishing this business list. Do Yellow Page search.

Revised in Annual Report, see last table for list of all business types included in search (under column "Target")

Business types do not equate with criteria. What CRITERIA are used to prioritize businesses. If you laid out criteria as you commit to do on pg. 3-10 of the SWMP, you might realize that other types of businesses need to be inspected.

4) Identify all business "types" and those that were selected. Follow-up with Kira because our list looks so limited just nursery and auto. Why just two business categories??

Revised, see last table for list of all business types included in search (under column "Target")

What is this list? (It has no title) Will all businesses that fall into this category be inspected every year then?

Additional comments I'd made at our first meeting that were not addressed here:

In Sec. 1.1, it states that businesses already enrolled in these other inspection programs are not targeted here. I had asked that the inspections done through these other programs be explained (i.e. checklists provided) so that the public and the Regional Water Board may determine whether

they are inspecting for the appropriate stormwater and illicit discharge BMPs. It also says these are included in the Annual Report, which I do not see anywhere.

In Sec. 1.2, #2 says “utilize a systematic inspection program.” Given that this is the inspection program, I think an explanation about what this systematic inspection program is is highly warranted.

In Sec. 2.3 it says “routine” inspections are conducted “on a regular basis”; what is “a regular basis”? define frequency.

-----Original Message-----

From: Garnand, Cathleen [mailto:Cgarnan@cosbpw.net]

Sent: Tuesday, September 18, 2007 4:04 PM

To: Kira Redmond

Cc: Carso, Eric

Subject: re business inspection

Kira,

Eric and I went through my notes from our meeting June 19, to figure out which items we may have missed.

Eric had accomplished some of the items we discussed, but not all, in the last draft you saw.

Mainly, he focused on the database carefully to verify the completeness of the list we generated. I believe that was your biggest concern, that we were not getting a full list of the types of businesses that we should be inspecting. He did go through the yellow pages to add additional businesses from the categories we're addressing. The revised inspection program lists those business categories we selected (see last table under column “Target”)

Hopefully we've done a better job addressing your comments on this round, see attached (same as those posted on our website). We can always seek improvements.

Just to make sure I didn't miss anything from our meeting, here's an outline from my notes, with a brief summary under each item:

5) *Add all Monterey's “groups”*

Actually, Monterey only does restaurant and vehicle/fueling according to their staff.

6) *Modify the restaurant inspector's checklist, use Monterey as example*

EHS won't modify their checklist; it follows a state-issued format. The checklist does require inspectors to address H&S Code 5411 which prohibits waste discharges.

7) *Send revised Excel spreadsheet with business lists to Kira*

Revised; sorry we didn't get this to you before.

8) *Explain background / criteria for establishing this business list. Do Yellow Page search.*

Revised in Annual Report, see last table for list of all business types included in search (under column “Target”)

9) *Identify all business “types” and those that were selected. Follow-up with Kira because our list looks so limited just nursery and auto. Why just two business categories??*

Revised, see last table for list of all business types included in search (under column “Target”)

10) *Need to update business list annually. Include statement in protocols that will be updated annually.*

See 2.9 “Review update Targeted / Priority business list”

11) *Get all inspection checklists in Word – they’re all PDF and focus on restaurant, auto repair, gas stations.*

We’re okay as-is

12) *List “all appropriate education materials” See Section 2.6 Make an appendix. Include Western Washington, EPA, etc.*

We have info brochures already for the types of businesses we’re inspecting. If inadequate, we’ll revise them.

13) *Coordinate with cities, espec for business like mobile cleaners that move around County/City.*

Discussions underway with City SB

14) *Add details of abatement under 2.7 refer to Discharge Ordinance*

Revised.

15) *Inspection entry procedures. What would we do if access is denied? How follow-up? Can’t force ourselves, so then what?*

Revised.

16) *Outline a one-page “Training Program” that lists primary components of training for inspectors, for example include this description of scope / purpose, add BMP Fact Sheets, relevant ordinances / Codes, attendance at annual training in accredited IDDE program, etc.*

Missed this one. We’ll work on this.

17) *See Appendix C Inspection form too “restauranty”. Like salad dressing, sauce, grease...*

Revised

18) *State that both Appendix B and C will go with every inspection. Make it clear how these are used by inspectors, because it is not clear.*

Missed this one. Will revise.

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