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Public Health
Seattle & King County

PUBLIC HEALTH - SEATTLE & KING COUNTY

Pump Truck Self-Inspection Program

Policy Implementation Proposal

PREPARED BY
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DATE
TBD

PROGRAM
On-site Sewage System Program

EVIDENCE BASE
The evidence base consists of 12 survey responses collected between June 26 and July 2, 2026, as well as internal data from the Pump Truck Self-Inspection Program and random audits.

RECOMMENDATION

Adopt pump truck self-inspection as a permanent policy, supported by random and risk-based audits and defined triggers for in-person inspections.

1. Summary

The Pump Truck Self-Inspection Pilot Program demonstrated strong industry acceptance and a clear opportunity to reduce time and administrative burdens without removing Public Health oversight. Based on the survey findings and internal data, this proposal recommends transitioning the pilot into a permanent policy. Under the proposed process, eligible pump trucks would alternate between self-inspections and in-person inspections. One year, the operator would inspect the truck(s) by completing an online form, submitting the required photographs, and confirming that the information is accurate. The following year, Public Health would inspect the truck(s) in person. Public Health would review each self-inspection and issue an inspection sticker when all requirements are met. Public Health could also inspect a truck in person at any time based on a complaint, identified risk, **or** random selection**.**

2. Background and Survey Evidence

2.1 Pilot Program

A pilot program was designed and implemented during the 2026 renewal season to determine whether a guided self-inspection process could maintain compliance expectations while improving efficiency for

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pump truck operators and Public Health staff. Public Health received a total of 312 pump truck inspection reports. Of those, 105 inspections, or 33.7%, were conducted in person by Public Health, while 207 inspections, or 66.3%, were completed through the self-inspection process.

The self-inspection program provides several benefits to Public Health and pump truck operators. A typical pump truck inspection takes approximately 10 minutes to complete. Based on the 207 self-inspections, the program is estimated to have saved 34.5 staff hours, which is equivalent to approximately 4.3 eight-hour workdays. This estimate does not include additional savings associated with staff travel time, fuel, and County vehicle maintenance. For operators, the program reduces scheduling challenges and interruptions to daily business operations. The required digital form, photographs, and attestation also create a consistent inspection record, encourage operators to take responsibility for maintaining compliant vehicles, and meet the inspection requirements of the King County Board of Health Code, Title 13, subsection 13.68.030. By reducing the time spent on routine inspections, Public Health staff can focus on other program activities, while the self-inspection process strengthens accountability and trust between the County and pump truck operators.

The program also has limitations. Self-inspections depend on operators providing complete and accurate information. Photographs may not show leaks, damaged equipment, missing supplies, or other conditions that could be identified during an in-person inspection. Inspection quality may also vary because operators may interpret requirements differently. As a result, some violations could remain undetected and increase the risk of sewage exposure, spills, or environmental contamination. Public Health must also continue using staff resources to review submissions, maintain records, issue inspection stickers, answer questions, and conduct audits. To address these concerns, the program should include clear eligibility requirements, alternating in-person inspections, random and risk-based audits, complaint-based inspections, and appropriate consequences for inaccurate reporting.

2.2 Participant Survey

Liquid Waste Pumper/Hauler business owners were asked to participate in a survey to evaluate the pilot program. A total of twelve responses were submitted from June 26 through July 2, 2026.

Survey measure	Result
Overall satisfaction	11 of 12 rated the program 5/5; average rating of 4.67/5
Instructions were clear	12 of 12 (100%)
Communication was clear and timely	11 of 12 (91.7%)
The process saved time	11 of 12 (91.7%)

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Survey measure	Result
The process created no additional burden	11 of 12 (91.7%)
Support for continuing self-inspections	11 of 12 (91.7%)
Vehicle issues that an in-person inspection would have identified	0 of 12

Source: Pump Truck Self-Inspection Pilot Program Feedback survey, 12 responses, June 26 through July 2, 2026.

The results show broad support for continuing self-inspections. Respondents consistently identified time savings, reduced costs, limited additional burden, and the value of relying on existing vehicle-maintenance practices. Suggested improvements focused primarily on administration: prepopulating vehicles in Skip the Paper, reducing duplicative paperwork, and issuing stickers more quickly.

Because the survey reflects 12 responses, implementation should be paired with ongoing audit data, complaint reviews, processing-time measures, and periodic hauler feedback. The size of the response group supports a controlled permanent implementation with safeguards rather than implementation without oversight.

2.3 Audits

Audits were conducted at the Renton Wastewater Treatment Facility on July 12, August 19, August 20, and August 25, 2026. During each audit, all trucks entering the facility were subject to inspection. Eleven trucks were inspected at the facility. A separate audit was also conducted at the yard of a major hauler on August 31, 2026, where four trucks were available for inspection. All four trucks were inspected, and no violations were identified.

Across all audits, 15 trucks were inspected. Ten trucks were compliant at the time of inspection, resulting in an initial compliance rate of 66.7%. Five trucks, or 33.3%, did not have the required spill kit, which constituted a critical violation. One operator immediately corrected the violation by purchasing the necessary materials from a nearby hardware store and returning to the facility to provide proof. Following this correction, 11 of the 15 trucks were compliant, resulting in a post-correction compliance rate of 73.3%. No warning letter was issued to that company. Warning letters were issued to the remaining four companies. As a result, a photograph of the spill kit will be required in the self-inspection report, moving forward.

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3. Proposed Policy

3.1 Policy Statement

Public Health shall establish a permanent pump truck self-inspection pathway using a digital submission platform during designated self-inspection years. Haulers will submit required vehicle information, photographs, and an attestation. Public Health staff will review each submission for completeness, request corrections when needed, authorize sticker issuance when requirements are satisfied, and retain the records for audit and compliance purposes. The procedures outlined in this proposal will satisfy the requirements of King County Board of Health: Title 13 subsection 13.68.030.A.3.

Participation in the self-inspection pathway will not waive any existing requirement or limit Public Health's authority to conduct an inspection.

3.2 Policy Objectives

- **Maintain compliance:** Preserve equipment and sanitation expectations through standardized evidence, staff review, and targeted verification.
- **Reduce avoidable burden:** Limit unnecessary travel, scheduling, and downtime when compliance can be verified through a complete self-inspection submission.
- **Retain oversight:** Use random and risk-based audits, complaint response, and required physical inspections to verify the integrity of the program.
- **Improve service consistency:** Create a predictable review, correction, and sticker-issuance process for staff and operators.

3.3 Standard Biennial Process

- Self-inspections and in-person inspections will alternate by certification year. For example, inspections in 2027 will primarily be self-inspections unless a hauler elects an in-person inspection; inspections in 2028 will be conducted in person.
- **Submit self-inspection:** Require the hauler to inspect their fleet, upload the required photographs (license place, vehicle from the side, spill kit on vehicle), and attest that the submission is accurate.
- **Staff review:** Verify that all required fields and photographs are present and consistent.
- **Resolve deficiencies:** Return incomplete or unclear submissions with specific correction instructions and require a physical inspection when the issue cannot be verified remotely.
- **Mail the inspection sticker:** Mail the sticker after the submission is accepted and any required corrections are completed, along with approval of their renewal application.

- **Retain and audit:** Maintain the submission and review record, then select vehicles for random or risk-based PHSKC inspections.
- **Justification for biennial inspections:** More frequent routine inspections are not considered necessary for every eligible truck because operators conduct pre-checks (required by the Department of Transportation), complete a guided self-inspection during the alternate year, provide required photographs and an accuracy attestation, and correct issues identified during Public Health's review. Random, risk-based, and complaint-based inspections may also occur at any time.
- **Health Risks for Biennial inspections:** Pre-checks, photographs, and attestations are valuable, but they rely on the hauler honestly reporting the truck's condition. A hauler who knowingly conceals a leaking tank, damaged hoses or valves, sanitation deficiencies, or missing spill-control equipment could allow an unsafe truck to remain in operation until the problem is discovered through an audit, complaint, traditional inspections or reported spill, which may expose the public to untreated sewage among other hazards associated with liquid waste.

3.4 Proposed PHSKC Inspection Triggers

A PHSKC inspection may be required when one or more of the following conditions apply:

- **New or materially modified vehicle:** A truck is newly added to the hauler's fleet or has undergone changes that cannot be adequately verified through the standard submission, such as a rusted tank that has been repaired.
- **Incomplete or inconsistent evidence:** Required information or photographs are missing, unclear, contradictory, or otherwise insufficient.
- **Complaint or compliance concern:** Public Health receives information that warrants direct verification.
- **Prior compliance history:** Past findings indicate that additional verification is appropriate.
- **Random or risk-based selection:** The vehicle is selected under the program's routine quality-assurance process.

4. Compliance and Oversight

4.1 Audit Model

The permanent program should combine a baseline of quarterly random audits with risk-based selection.

- **Random audits:** Select a portion of accepted self-inspections without regard to operator history. Operators with more than ten trucks will be prioritized as resources allow due to risk associated

with high turnover. Audits will include unannounced site visits to the Renton Wastewater Treatment Facility and audit trucks using the facility.

- **Risk-based audits:** Prioritize vehicles associated with incomplete submissions, prior findings, significant modifications, or other documented concerns.
- **Complaint-based inspections:** Conduct direct verification when a complaint or field observation raises a specific compliance concern.

4.2 Discrepancies and Enforcement

Incomplete submissions should be returned for correction. Any discrepancy identified during a review or audit should be documented and addressed through correction, reinspection, or an in-person inspection, depending on its nature. Serious, repeated, or knowingly inaccurate submissions will be addressed through existing compliance and enforcement procedures outlined in the Code of Performance and Ethics. Further, repeat violators will be removed from the self-inspection program and required to undergo in-person inspections in the future.

5. Roles and Responsibilities

- **Industry liaison:** Coordinate operator communications, support staff training, resolve escalated questions, prepare evaluation summaries, maintain vehicle records via Tyler, monitor submission status, sticker processing, and follow up on incomplete submissions or technical questions. Conduct random, risk-based, and complaint-based physical inspections; document findings; and identify recurring issues that may require policy revisions.
- **Pump truck operators:** Submit complete and accurate information, maintain required equipment and conditions, complete requested corrections, and make vehicles available for any required physical inspection by December 31 of each year.

6. Performance Measures

The program should review the following measures by the end of the first quarter.

- **Submission completion:** Number and percentage of operators completing the self-inspection process.
- **First-pass completeness:** Percentage of submissions accepted without a correction request.
- **Audit results:** Number and types of discrepancies identified through random and risk-based audits.

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- **Compliance outcomes:** Complaints, confirmed violations, repeat findings, and physical inspections required after self-inspection.
- **Operator experience:** Follow-up feedback regarding clarity, burden, timeliness, and confidence in the process.

7. Process Improvements Before Launch

- **Develop self-inspection form and report in JotForm**: Existing application/database can no longer be used for self-inspection form and PDF report generation. This service cannot be migrated into Tyler EPL. JotForm will be used for this form and report, but it needs to be further developed.
- **Improve sticker processing:** Mail stickers by the end of the first quarter of the certification year. This procedure will satisfy the requirements under King County Board of Health Title 13 subsection 13.68.030.C
- **Preserve clear instructions:** Retain the portions of the pilot guidance that produced a 100% positive response regarding instructional clarity and publish an FAQ.

8. Decision Requested

Approve the following policy direction:

- **Permanent implementation:** Establish a permanent policy that alternates between self-inspections and in-person inspections by certification year.
- **Oversight model:** Retain Public Health authority through random, risk-based, complaint-based, and otherwise required physical inspections.
- **Implementation materials:** Develop and approve the final SOP, submission requirements, audit criteria, and communication materials before launch.
- **Evaluation:** Require a Q1 implementation review and an annual program evaluation using the measures in this proposal.

Proposed outcome: A more efficient inspection pathway that preserves accountability and maintains Public Health oversight.