Washington Department of Ecology Electronic Submission Cover Letter



WQWebSubmittal - Submittal Submission Id: 1704483 - 3/26/2020 11:02:12 AM

Company Name	Signer Name	System Name	
City of Mukilteo	Jennifer Gregerson	WQWebPortal	

Attachments:

Document Name Or Description	Document Name
Submitted Copy of Record for City of Mukilteo	Copy of Record CityofMukilteo Thursday March 26 2020
WAR045532_2_03262020103330	FINAL 2020 Stormwater Manageme_2_03262020103330
WAR045532_4a_03062020125804	Internal_CoordinationMemo_4a_03062020125804
WAR045532_21_03062020130006	OutreachActivities2019_21_03062020130006
WAR045532_26a_03062020130014	StewardshipOpportunities_26a_03062020130014
WAR045532-2019-ImportedIDDEs_03122020105830	WAR045532-2019-ImportedIDDEs_03122020105830

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only



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Annual Report

Number	Permit Section	Question
1	S5.A	Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.
		Not Applicable
2	S5.A	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)
		FINAL 2020 Stormwater Manageme_2_03262020103330
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3 including costs or estimated costs of implementing the SWMP.
		Yes
4	S5.A.5.b	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)
		Yes
4a	S5.A.5.b	Attach a written description of internal coordination mechanisms. (S5.A.5.b).
		Internal_CoordinationMemo_4a_03062020125804
15	S5.C.1.c	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)
		Yes
16	S5.C.1.c	From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)
		No
20	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)
		Yes
20a	S5.C.2	If yes, list the elements, and the regional program.
		Regional Program: Puget Sound Starts Here Elements: Posters used language and BMP information for to car wash BMPS, Scoop the Poop BMPs, and car maintenance BMPs. Website content includes Dog Doogity video, link to Natural Yard Care information Regional: Washington Waters (ECY) Element: Website links to car washing BMPs Regional: Stormwater Outreach for Municipalities (STORM) Element: Used Messaging Recommendations for Stormwater Messaging Toolkit in branding design (see continuation in Comments
		Comment: Regional: Natural Yard Care Education with Snohomish County area cities. Elements: Partnership on classroom and hands-on trainings Regional: ECOSS Puget Sound Spill Kit Program Elements: Provide program opportunities to local businesses.

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Number	Permit Section	Question
21	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.
		OutreachActivities2019_21_03062020130006
22	S5.C.2	Conducted an evaluation of the effectiveness of the ongoing behavior change program and documented recommendations as outlined in S.5.C.2.a.ii(b). (Required no later than July 1, 2020)
		Yes
26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.
		Yes
26a	S5.C.2	Attach a list of stewardship opportunities provided.
		StewardshipOpportunities_26a_03062020130014
27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a)
		Notice of Draft SWMP was posted on the City's website and included as a City news item. The news item was run twice between January , with a link to comment form
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)
		Yes
28a	S5.C.3.	List the website address in Comments field.
		https://mukilteowa.gov/departments/public-works/surface- water/stewardship/npdes/
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii? Yes
30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)
		Not Applicable
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)
		Not Applicable
32	S5.C.4.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.C.4.c? (Required no later than August 1, 2021)
		Not Applicable

Num	ber Permit Section	Question
33	3 S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. Describe actions in Comments field. (S5.C.5.b)
		Yes
		Comment: As part of our standard response to illicit discharge, we educate the person / business about the negative impacts on freshwater to improper disposal. The City's Business Spill Prevention Outreach also provides this information to all businesses in the program. City employees are informed through the City's regular training program.
34	\$ S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.
		Yes
35	5 S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.
		Yes
35	a S5.C.5	Cite field screening methodology in Comments field.
		Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual, DOE, 2013.
36	5 S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)
		45
36	a S5.C.5	Cite field screening techniques used to determine percent of MS4 screened.
		Catch basin inspection program
37	7 S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.)
		17
38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)
		Spill hotline phone number is on the City's website. Include in outreach and take-away materials for outreach events.
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.
		Yes
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.
		Yes
4:	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f.
		Yes

Number	Permit Section	Question
42	S5.C.5	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12.
		Imported from WQWebIDDE
43	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.
		Yes
44	S5.C.6.	Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022)
		Not Applicable
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)
		0
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)
		0
47	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)
		Yes
47a	S5.C.6.	Number of site plans reviewed during the reporting period.
		11
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential?
		Yes
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.
		Yes
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii.
		24
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv?
		Yes

Number	Permit Section	Question
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v)
		Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)
		Yes
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv)(S5.C.7.c.viii)
		0
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)
		Yes
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d)
		Yes
55	S5.C.6.	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e)
		Yes
56	S5.C.7.	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.7.a.?
		Yes
57	S5.C.7.	Updated maintenance standards specified in Stormwater Management Manual for Western Washington per S5.C.7.a? (Required no later than June 30, 2022)
		Not Applicable
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a)
		No
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard.
		Yes
59a	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.

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	Number	Permit Section	Question
	60	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))?
			Yes
	61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b)
			Yes
	61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b)
			Not Applicable
	62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii)
			Yes
	63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)
			Yes
	63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)
			167
	63b	S5.C.7.	Number of facilities inspected during the reporting period.
			166
	63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period.
			42
	64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i.
			Not Applicable
	65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.
			Yes
	66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.7.c.iii)
			Yes
	66a	S5.C.7.	Number of known catch basins?
			4546

Number	Permit Section	Question
66b	S5.C.7.	Number of catch basins inspected during the reporting period?
		1967
66c	S5.C.7.	Number of catch basins cleaned during the reporting period?
		532
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii. (a)-(c))
		Not Applicable
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d)
		Yes
69	S5.C.7.	Documented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d – Required by December 31, 2022)
		Not Applicable
70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e)
		Yes
71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f)
		Yes
72	S5.C.7.	Updated, if needed, SWPPPs according to S5.C.7.f no later than December 31, 2022.
		Not Applicable
73	S5.C.8	Adopted ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities per S.5.C.8.b.i. (Required by August 1, 2022)
		Not Applicable
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.)
		Not Applicable
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023).
		Not Applicable

Numb	er Permit Section	Question
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023).
		Not Applicable
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv.
		Not Applicable
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken.
		Not Applicable
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v?
		Not Applicable
80	S 7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)
		Not Applicable
81	S 7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)
		Not Applicable
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)
		Yes
83	S8	Notified Ecology by December 1, 2019 which option you selected: S8.A.2.a, or S8.A.2.b.
		Yes
84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?
		Yes
85	S8	Notified Ecology by December 1, 2019 which option you selected: S8.B.2.a, or S8.B.2.b?
		Yes
86	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2020? (S8.C.1.b and Appendix 9)
		Not Applicable
88	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)
		Not Applicable

Number	Permit Section	Question
89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.
		Not Applicable
90	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)
		Not Applicable
91	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.
		Not Applicable
92	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)
		Not Applicable
93	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)
		Not Applicable
94	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.
		Not Applicable

Attachments:

View Files Attached to Submission

	DocDescr	DocName	DocExt	DocID	SubID	AppName
View	Submitted Copy of Record for City of Mukilteo	Copy of Record CityofMukilteo Thursday March 26 2020	.pdf	922498	1704483	wqwebportal
View	Submitted Cover Letter for City of Mukilteo	Cover Letter CityofMukilteo Thursday March 26 2020	.pdf	922499	1704483	wqwebportal
View	WAR045532_2_03262020103330	FINAL 2020 Stormwater Manageme_2_03262020103330	.pdf	922489	1704483	wqwebportal
View	WAR045532_4a_03062020125804	Internal_CoordinationMemo_4a_03062020125804	.pdf	906002	1704483	wqwebportal
View	WAR045532_21_03062020130006	OutreachActivities2019_21_03062020130006	.pdf	906005	1704483	wqwebportal
View	WAR045532_26a_03062020130014	StewardshipOpportunities_26a_03062020130014	.pdf	906006	1704483	wqwebportal
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Date:

January 27, 2015

To:

Robert McGaughey, Public Works Director

Patricia Love, Community Development Director

Glen Pickus, Planning Manager

Rick Hill, Public Works Superintendent

From:

Jennifer Adams, Surface Water Technician

RE:

NPDES Internal Coordination

NPDES Internal Coordination

Purpose of Internal Coordination

The National Permit Discharge Elimination System (NPDES) Permit impacts several City departments. The purpose of internal coordination is to provide direction on City practices covered under the NPDES Permit, track, and report on those activities. Under Section S5.A.5.b of the Permit, The City is required to have a written description of internal coordination mechanisms. This memo serves to meet that requirement.

Goals of Internal Coordination

- Make NPDES requirements known and understood City-wide.
- Determine whether current practices are adequate to meet Permit requirements.
- Address and rectify any Permit compliance gaps.
- Determine whether processes are in place to capture required information for the Annual Report. Rectify as necessary.
- Compile required information for and complete the Annual Report.
- Develop the annual City of Mukilteo Stormwater Management Program Plan (this is different than the 2015-2021 Surface Water Master Plan).
- Complete development of training programs. Track required trainings.
- Other tasks that arise through Permit compliance.
- Share relevant documents at V:\ENGR\Stormwater\NPDES\Internal_Coordination_Docs
- Report out to the Executive Office and Council, as appropriate.

Several tasks in the NPDES Permit require cross-departmental coordination to achieve Permit compliance. The Internal Coordination opportunities outlined below will provide support to achieve Permit compliance, where more than one department may be affected. While these standing meetings have other items on their agendas, NPDES-related topics are added when necessary.



Internal Coordination

Bi-weekly Engineering / Planning Meeting Attendees – Public Works

Rob McGaughey, Public Works Director
Andrea Swisstack, Assistant City Engineer
Challis Stringer, Senior Engineering Technician
Jennifer Adams, Surface Water Technician
Attendees – Community Development Services
Patricia Love, Community Development Director
Glen Pickus, Planning Manager
Linda Ritter, Associate Planner
Anita Marrero, Associate Planner
Karl Almgren, Assistant Planner

Monthly Stormwater Meeting Attendees

Rob McGaughey, Public Works Director Andrea Swisstack, Assistant City Engineer (optional) Rick Hill, Public Works Superintendent Jennifer Adams, Surface Water Technician



2013 Permit Section S₅.C.1; 2019 Permit Section S₅.C.2 Public Education & Outreach 2019 City of Mukilteo Activities

Activity	Activity Description	Target Audience	Subject Area
Natural Yard Care (Behavior Change)	Held Lawn and Garden Fair in partnership with Snohomish County and area Phase II Permittees, as part of ongoing Behavior Change program. Residents		Yare care techniques protective of water quality
ECOSS – Business Spill Prevention Outreach (Behavior Change)	Provided businesses with spill prevention and spill plan training. Follow up visits were performed to evaluate understanding about stormwater before and after the trainings.	Businesses	General impacts of stormwater (and spills!) on surface waters
Snohomish Conservation District Classroom Lessons	Provided classroom lessons to elementary school students and teachers within the Mukilteo School District.		General impacts of stormwater on surface waters
Beach Watchers school based programming	Through the school-based program, the Beach Watchers gave presentations to classroom students and students on field trips at Lighthouse Park. Topics included watershed education and our influence on Puget Sound. In 2019, we reached 584 students.	School Age Children	General impacts of stormwater on surface waters
Summer Beach Days Education	Provided roving outreach to explore intertidal life during six low tide days for at least two hours. Reached approximately 787 beach goers.		General impacts of stormwater on surface waters
Touch-A-Truck Event Outreach	Tabled a stormwater specific table with information focused on pet waste disposal, car washing, and vehicle maintenance.	Residents	General impacts of stormwater on surface waters

Banner graphic from Touch A Truck

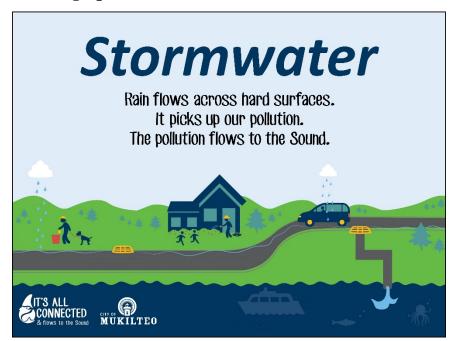


Photo of Table Top at Touch A Truck





2013 Permit Section S₅.C.2; 2019 Permit Section S₅.C.2 Stewardship Opportunities 2019 City of Mukilteo Activities

Activity	Activity Description	
Beach Watchers / Beach Naturalists	The program trained and recruited 18 new Beach Watchers and 4 new Beach Naturalists. Training was designed for people interested in learning about the marine environment and sharing that knowledge with park users and neighbors. Staff recruited from these trained volunteers for working at Mukilteo Lighthouse Park, and each new volunteer received mentorship from existing Beach Watchers.	
Roving Naturalist	Beach Watchers provide a myriad of outreach to Mukilteo residents and users of the Lighthouse Park area. The naturalists are volunteers who have been trained through the program. This is a great stewardship opportunity for the volunteers.	
Riparian Plantings	The City contracts with EarthCorps to oversee invasive weed control and volunteer plantings in the Japanese Gulch riparian areas.	
Storm Drain Marking Program	Provided opportunities and materials for local residents and businesses to install "No Dumping / Drains to Stream" medallions near catch basins. Advertised on website and at Touch-A-Truck.	