

Please send feedback to:

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NPDES Adhoc Group Summary

Illicit Discharge Detection and Elimination

The IDDE subtopic group met on 7/13 in Bellevue. Participation was low with only three in attendance and two on the phone. Our conversation initially focused around the differences in how and when we report out spills to the ERTS system and from that what is determined to be an Illicit Discharge. This ranged from only reporting large major spills that enter water bodies as illicit discharges to classifying anything that enters the MS4 as an illicit discharge. From this conversation it was clear that we need some guidance as to what constitutes an illicit discharge. We recommend that Ecology weigh in on this to provide their thoughts and intentions when the permit language was crafted.

Additionally we discussed the reporting requirements around illicit discharges. We found it curious that since we already report spills via ERTS then why do we report illicit discharges on the annual report as well. It would be nice if this information could be kept in a central database rather than redundant records by both the Cities and Ecology. We also talked about potential categories for severity of spills and illicit discharges, something along the line of a 1-5 scale to get a better understanding of the size and magnitude of these events and using this information to right size an IDDE program going forward. Staff training as well as contractor trainings was touched on briefly towards the end of our discussion and there may be opportunity here to define a region wide set of training topics so we are all consistent in the message we are giving.

Through the message board Ecology provided some clarification for the ERTS reporting and a couple links to help with further guidance...*The ERTS reporting does not include all of the information necessary to answer the IDDE annual report question (information related to actions you took to characterize, trace, and eliminate ID). We are looking into how we can use our reporting systems to ease the G3 and IDDE reporting. The 2012 response to comments document is also a good resource on this topic - starting on pg.*

109: www.ecy.wa.gov/programs/wq/stormwater/municipal/MUNIdocs/2012comments/2012RTC/Part1.pdf (attached)

An additional question was also raised through the message board surrounding the effectiveness of fields screening and asked if there is a better way to find illicit connections. Ecology also provided clarification here as well as a link... *And regarding field screening - the current permit language was written to provide flexibility, the CWP guidance is listed in the permit, however an additional resource was developed by King County, Stormwater Center, and Herrera with Ecology funding: www.wastormwatercenter.org/illicit-connection-illicit-discharge/ (not attached)*

- From this conversation, the issues on the table are do we need a better definition of what constitutes and IDDE or are we OK with leaving it as-is as it provides flexibility for permittees to interpret the reporting best suited to their operations?
- And is field screening an effective tool to continue using?

I-12 Illicit Discharge Detection and Elimination (IDDE)

Comments apply to the Phase I and Western Washington Phase II permits.

I-12.1 Clarify overall IDDE program purpose and focus

Permit reference: Phase I – S5.C.8

Western Washington Phase II – S5.C.3

Commenters: City of Auburn, City of Bellevue, City of Bothell, City of Bremerton, Clark County, City of Everett, City of Kent, King County, City of Kirkland, City of Longview, City of Marysville, City of Newcastle, City of Port Orchard, City of Poulsbo, City of Renton, City of Sammamish, City of SeaTac, City of Sedro Woolley, Snohomish County, City of Sumner, City of Vancouver

Summary of the range of comments

- Concerns with the overall description of the IDDE program, and adding the word —prevent, because these activities, including prevention, are not possible in all cases and at all times.
- Suggestions to reorganize the introductory sentence to better follow the language and organization of the section.
- Clarify the IDDE program applies only to MS4s owned or operated by the permittee that are covered by this permit.
- Clarify that stormwater facilities owned or operated by third parties are not required to be inspected under the IDDE program.

Response to the range of comments

- Ecology revised the overall description of the IDDE program to acknowledge this program is —designed to accomplish the specified activities, and the specified activities now follow the order and language used in the rest of the section. Note that the Phase II requirements in S5.C.3.a (mapping) support —tracing illicit discharges, and the requirements in S5.C.3.b (regulatory mechanism) support —preventing and —eliminating illicit discharges.
- All requirements in the municipal stormwater permit apply to the MS4s covered by the permits as specified in S1 of the permits. Adding the suggested clause throughout the permit is unnecessary.
- Ecology clarifies that stormwater facilities owned and operated by third parties and which do not discharge into the permitted MS4 are not subject to the MS4 permit requirements for IDDE. MS4 permittees are required to implement a program that addresses illicit discharges to the permittees' MS4 even when those illicit discharges originate on private property or within stormwater facilities owned and operated by third parties.