

Implementing IDDE NPDES Permit Requirements

JURISDICTION SURVEY RESULTS



Hello Water Quality Associates –

Late last year, the City of Bellevue, Redmond, and Kirkland put together a short survey to get a better understand of how jurisdictions, big and small, are all doing with implementing the IDDE NPDES permit requirements, especially with the twist of COVID. We had fabulous turnout in completing the survey – thank you (65 responses)! The survey results are showing some really great different program implementation information we each can takeaway. Information such as how we each primarily receive our water quality concerns calls, who within our jurisdiction responds to the calls, who cleans up the spills that do occur (responsible party vs. jurisdiction staff), how we are all handling enforcing code compliance (that is a touch one!), and how we train our staff.

Quick summary, we are all doing a really great job and learning from each other is a great way to grow. No need to reinvent the wheel with so much expertise out there! Please see the results attached.

Again, thank you for participating.

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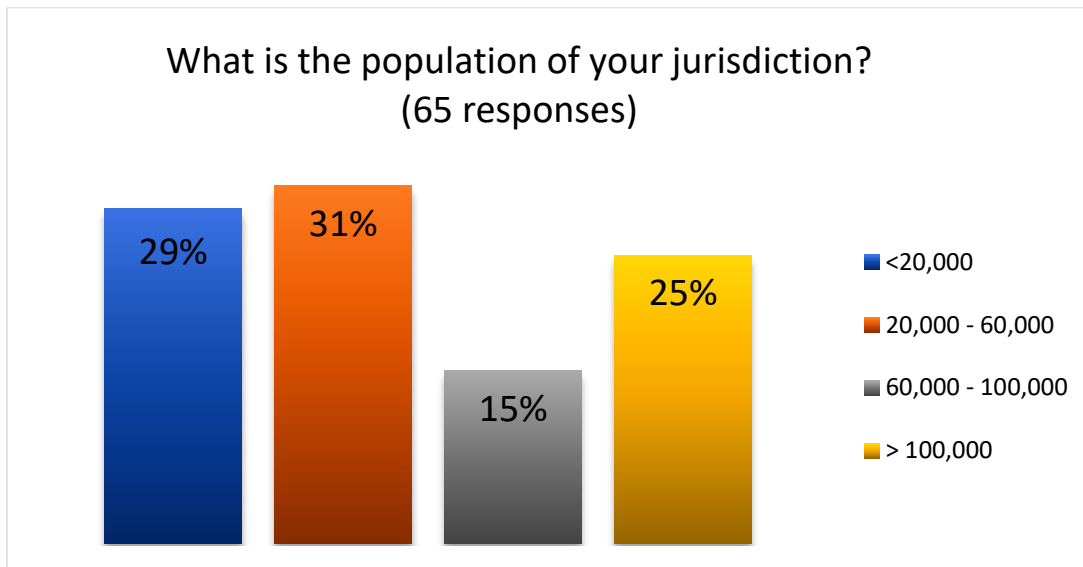
Survey question results are organized into two sections—the **survey questions with survey responses** and a **summary of jurisdictions results**. The two sections organize the survey results into four categories based on the jurisdictions population.

Survey Question Responses

Q1: What is the population of your jurisdiction?

(65 responses)

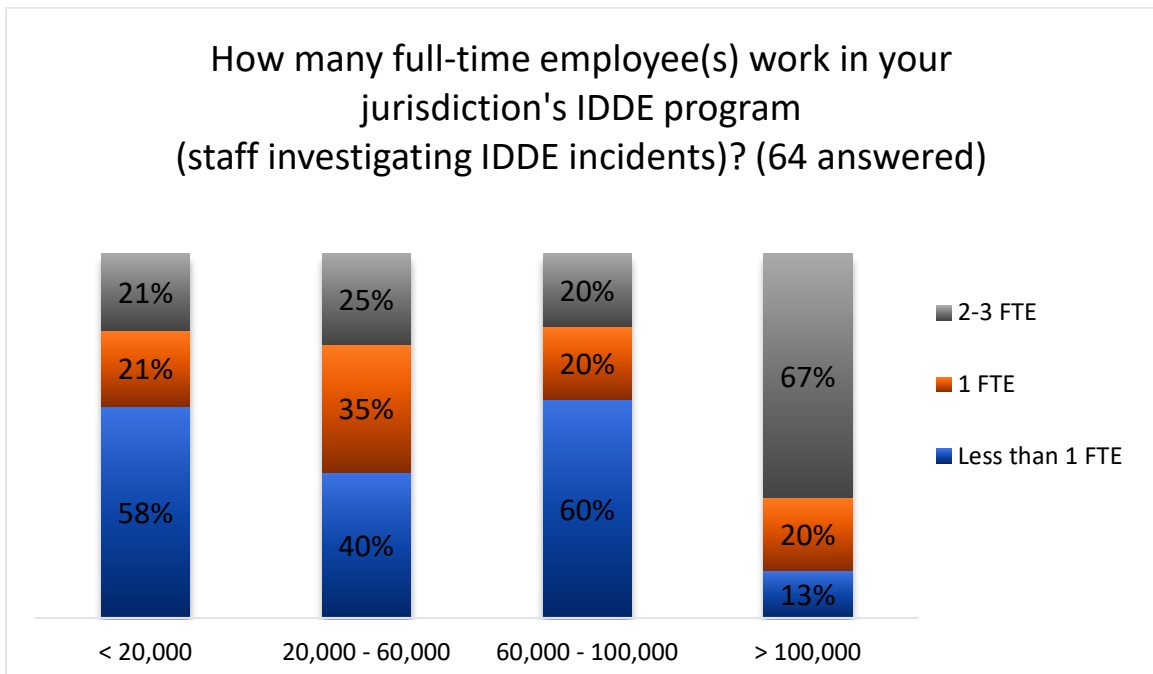
- 29% (19) < 20,000
- 31% (20) 20,000 – 60,000
- 15% (10) 60,000 – 100,000
- 25% (16) > 100,000



Q2: How many full-time employee(s) work in your jurisdiction's IDDE program (staff investigating IDDE incidents)?

(64 answered)

- < 20,000
 - 58% Less than 1 FTE
 - 21% 1 FTE
 - 21% 2-3 FTE
- 20,000 – 60,000
 - 40% Less than 1 FTE
 - 35% 1 FTE
 - 25% 2-3 FTE
- 60,000 – 100,000
 - 60% Less than 1 FTE
 - 20% 1 FTE
 - 20% 2-3 FTE
- > 100,000
 - 13% Less than 1 FTE
 - 20% 1 FTE
 - 67% 2-3 FTE



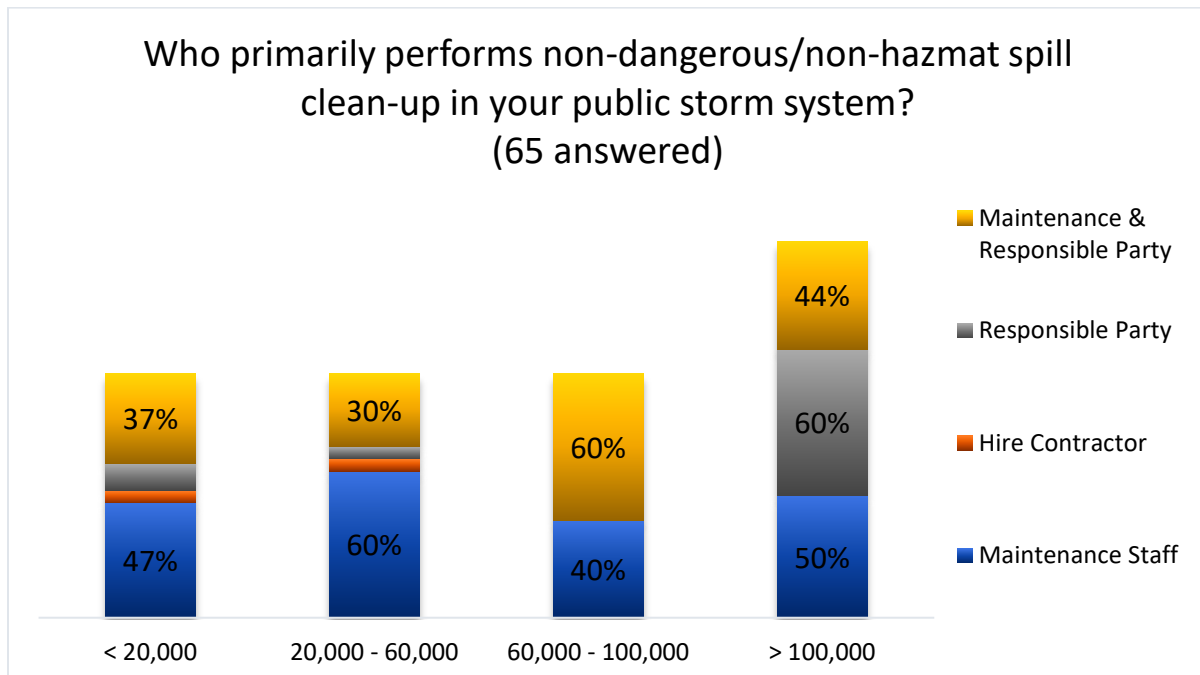
Q3: Where do you receive most of your water quality calls from? Rank from highest volume of calls to lowest volume of calls. (64 answered)

- < 20,000
 - Internal staff (not emergency services) & Customers
 - Ecology ERTS notifications
 - Emergency Services (fire/police) & Other jurisdictions (not Ecology)
- 20,000 – 60,000
 - Internal staff (not emergency services) & Customers
 - Ecology ERTS notifications
 - Emergency Services (fire/police) & Other jurisdictions (not Ecology)
- 60,000 – 100,000
 - Internal staff (not emergency services) & Customers & Ecology ERTS notifications
 - Emergency Services (fire/police) & Other jurisdictions (not Ecology)
- > 100,000
 - Internal staff (not emergency services) & Customers
 - Ecology ERTS notifications & Emergency Services (fire/police)
 - Other jurisdictions (not Ecology)

Q4: Please share any additional comments about where you receive most of your water quality calls from.

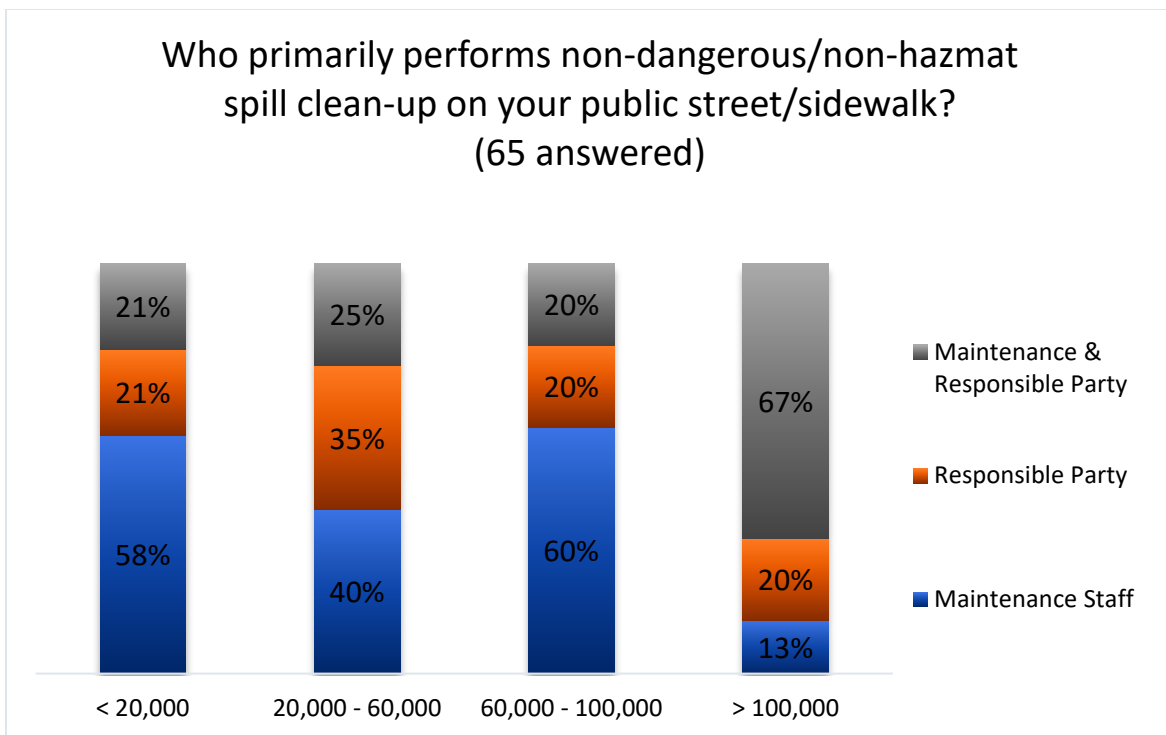
Q5: Who primarily performs non-dangerous/non-hazmat spill clean-up in your public storm system?
(65 answered)

- < 20,000
 - 47% Jurisdiction maintenance staff and equipment
 - 5% Jurisdiction hires a clean-up contractor
 - 11% Responsible party cleans spill up (including hiring a contractor)
 - 37% Combination of maintenance staff & responsible party
- 20,000 – 60,000
 - 60% Jurisdiction maintenance staff and equipment
 - 5% Jurisdiction hires a clean-up contractor
 - 5% Responsible party cleans spill up (including hiring a contractor)
 - 30% Combination of maintenance staff & responsible party
- 60,000 – 100,000
 - 40% Jurisdiction maintenance staff and equipment
 - 60% Combination of maintenance staff & responsible party
- > 100,000
 - 50% Jurisdiction maintenance staff and equipment
 - 6% Responsible party cleans spill up (including hiring a contractor)
 - 44% Combination of maintenance staff & responsible party



Q6: Who primarily performs non-dangerous/non-hazmat spill clean-up on your public street/sidewalk? (65 answered)

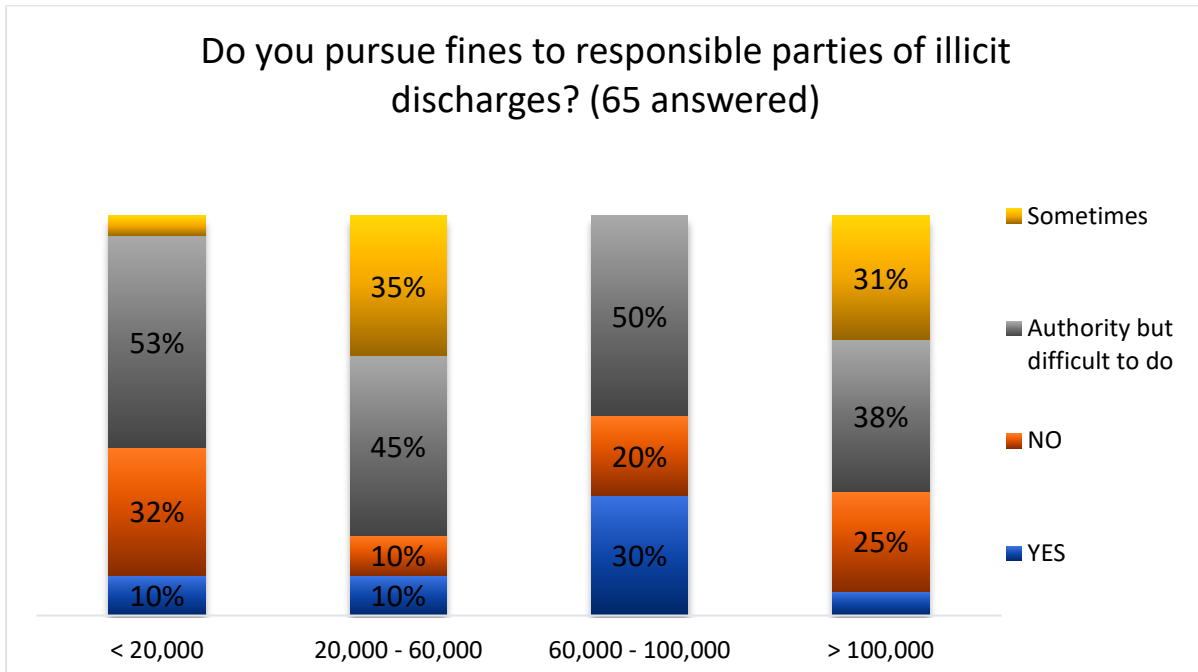
- < 20,000
 - 53% Jurisdiction maintenance staff and equipment
 - 10% Responsible party cleans spill up (including hiring a contractor)
 - 37% Combination of maintenance staff & responsible party
- 20,000 – 60,000
 - 90% Jurisdiction maintenance staff and equipment
 - 5% Responsible party cleans spill up (including hiring a contractor)
 - 5% Combination of maintenance staff & responsible party
- 60,000 – 100,000
 - 60% Jurisdiction maintenance staff and equipment
 - 40% Combination of maintenance staff & responsible party
- > 100,000
 - 50% Jurisdiction maintenance staff and equipment
 - 19% Responsible party cleans spill up (including hiring a contractor)
 - 31% Combination of maintenance staff & responsible party



Q7: Do you pursue fines to responsible parties of illicit discharges?

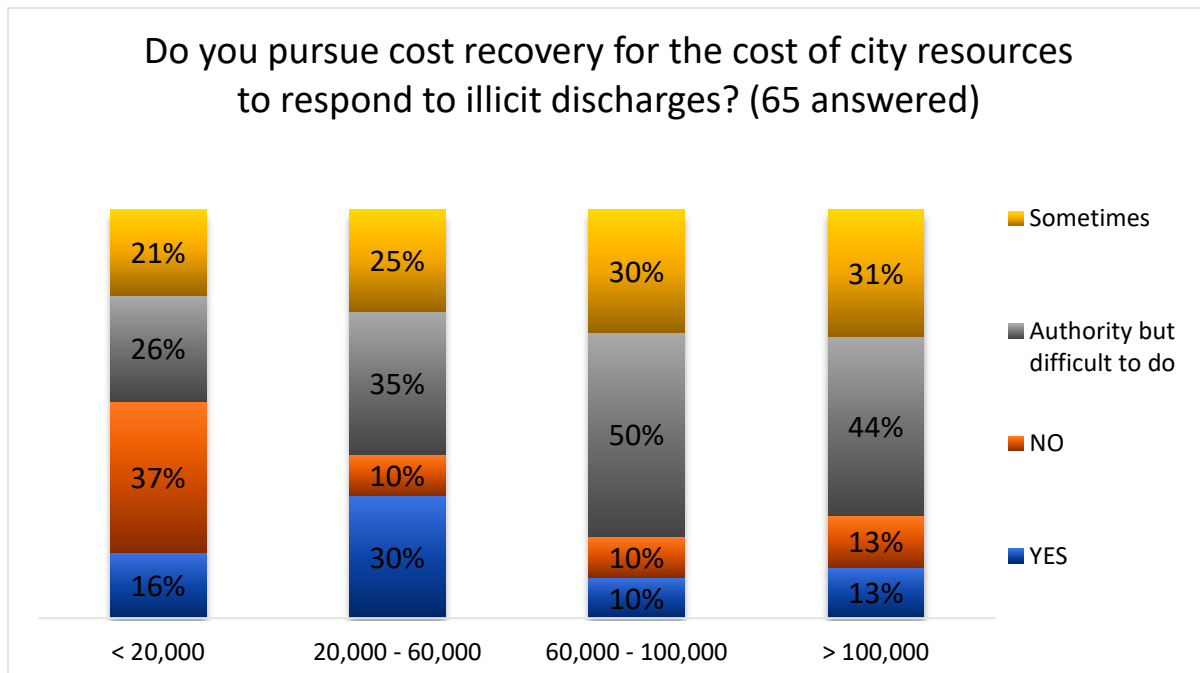
(65 answered)

- < 20,000
 - 10% Yes
 - 32% No
 - 53% We have authority to but it's difficult to implement
 - 5% Sometimes
- 20,000 – 60,000
 - 10% Yes
 - 10% No
 - 45% We have authority to but it's difficult to implement
 - 35% Sometimes
- 60,000 – 100,000
 - 30% Yes
 - 20% No
 - 50% We have authority to but it's difficult to implement
- > 100,000
 - 6% Yes
 - 25% No
 - 38% We have authority to but it's difficult to implement
 - 31% Sometimes



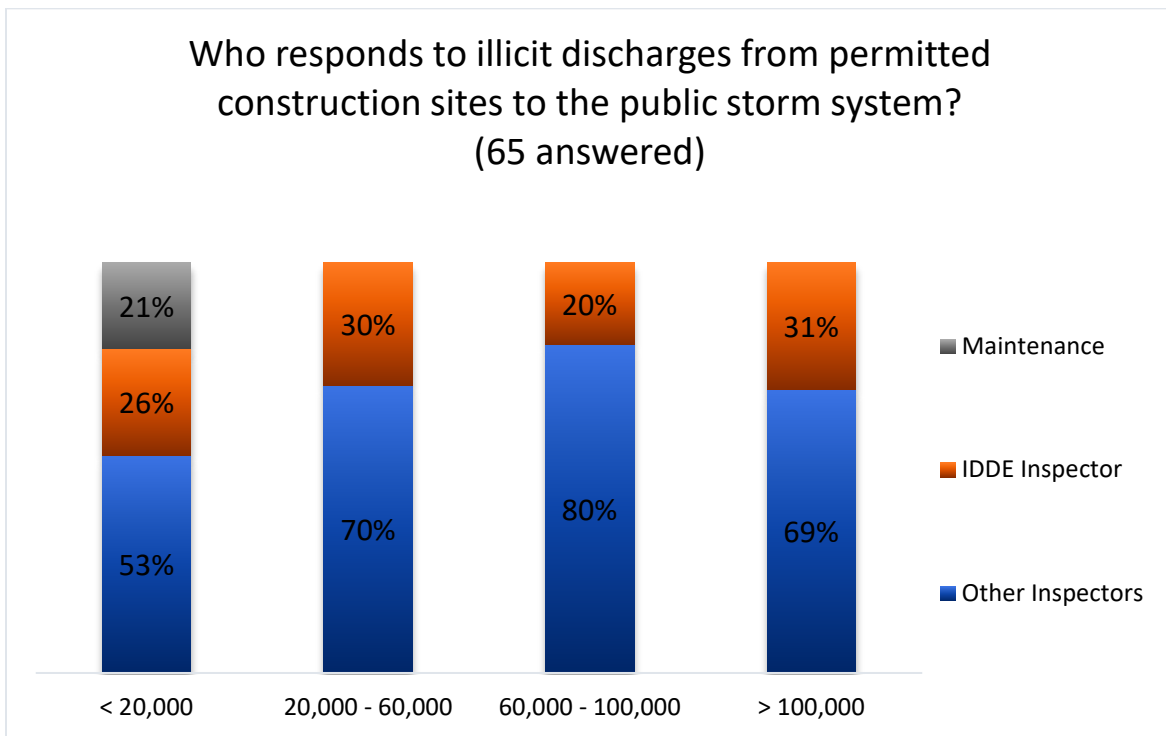
Q8: Do you pursue cost recovery for the cost of city resources to respond to illicit discharges?
(65 answered)

- < 20,000
 - 16% Yes
 - 37% No
 - 26% We have authority to but it's difficult to implement
 - 21% Sometimes
- 20,000 – 60,000
 - 30% Yes
 - 10% No
 - 35% We have authority to but it's difficult to implement
 - 25% Sometimes
- 60,000 – 100,000
 - 10% Yes
 - 10% No
 - 50% We have authority to but it's difficult to implement
 - 30% Sometimes
- > 100,000
 - 12.5% Yes
 - 12.5% No
 - 44% We have authority to but it's difficult to implement
 - 31% Sometimes



Q9: Who responds to illicit discharges from permitted construction sites to the public storm system?
(65 answered)

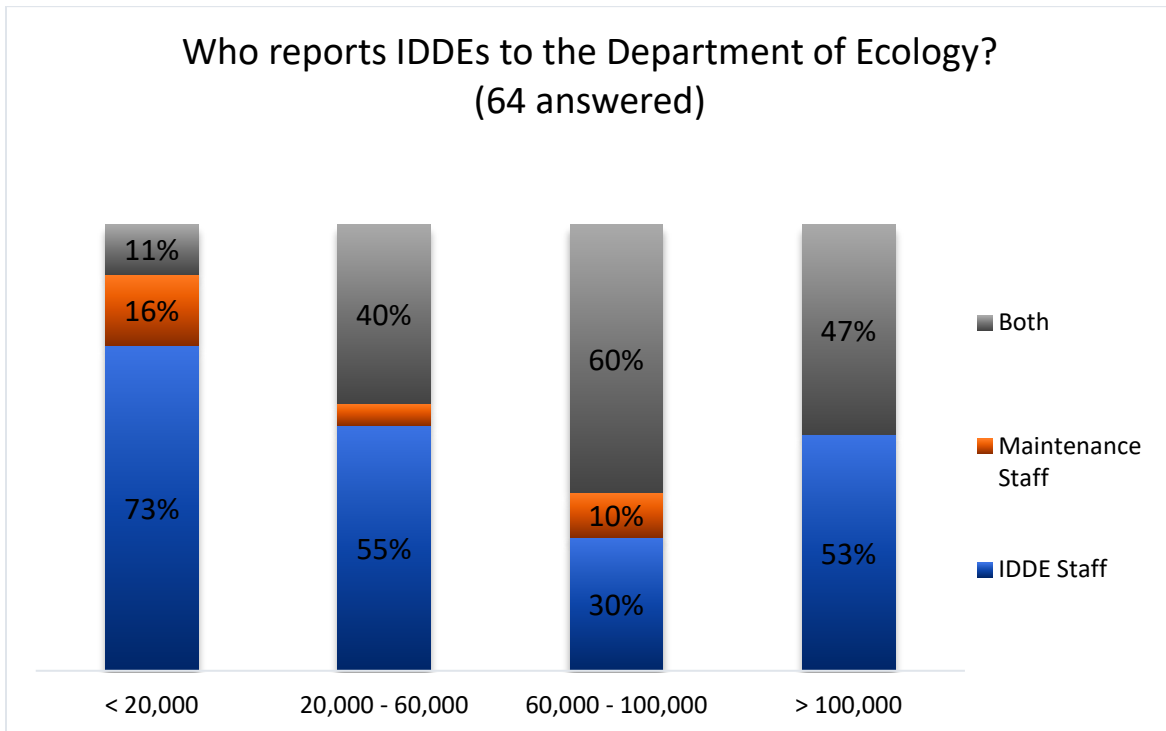
- < 20,000
 - 53% Inspectors (including ROW, Development, Building, CIP, but not including IDDE)
 - 26% IDDE inspector
 - 21% Jurisdiction maintenance staff and equipment
- 20,000 – 60,000
 - 70% Inspectors (including ROW, Development, Building, CIP, but not including IDDE)
 - 30% IDDE inspector
- 60,000 – 100,000
 - 80% Inspectors (including ROW, Development, Building, CIP, but not including IDDE)
 - 20% IDDE inspector
- > 100,000
 - 69% Inspectors (including ROW, Development, Building, CIP, but not including IDDE)
 - 31% IDDE inspector



Q10: Who reports IDDEs to the Department of Ecology?

(64 answered)

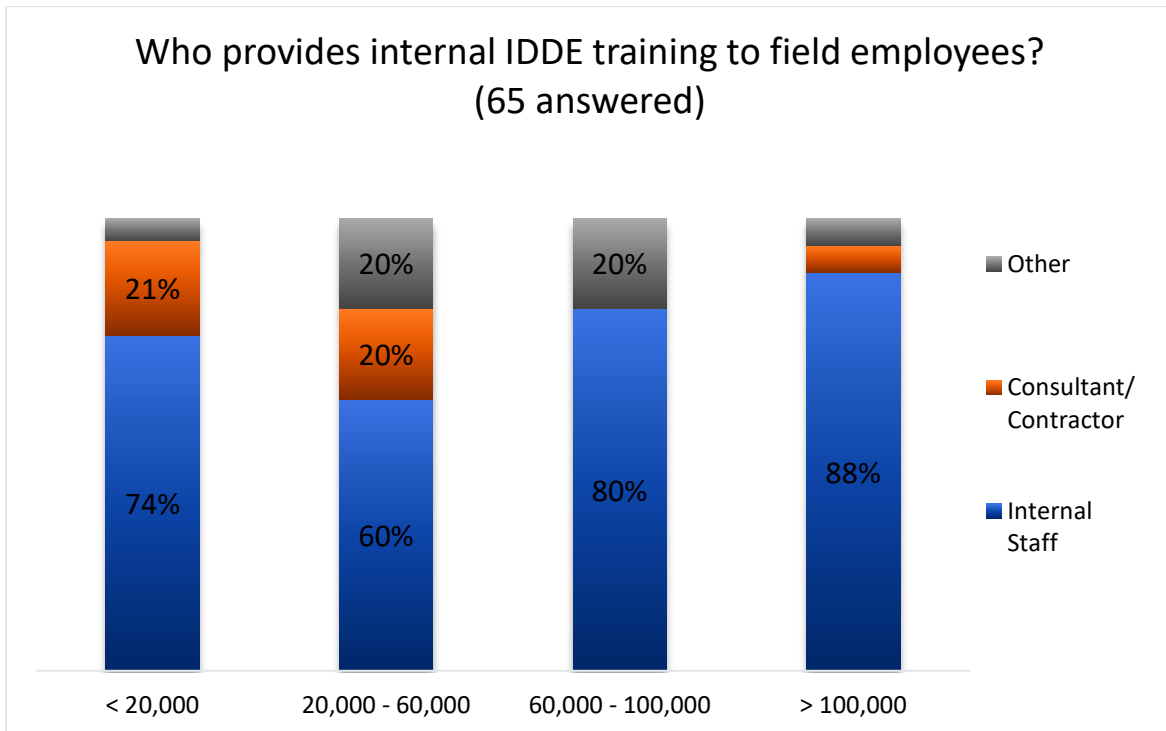
- < 20,000
 - 73% IDDE Program Staff
 - 16% Maintenance Staff
 - 11% Both IDDE Program Staff and Maintenance Staff
- 20,000 – 60,000
 - 55% IDDE Program Staff
 - 5% Maintenance Staff
 - 40% Both IDDE Program Staff and Maintenance Staff
- 60,000 – 100,000
 - 30% IDDE Program Staff
 - 10% Maintenance Staff
 - 60% Both IDDE Program Staff and Maintenance Staff
- > 100,000
 - 53% IDDE Program Staff
 - 47% Both IDDE Program Staff and Maintenance Staff



Q11: Who provides internal IDDE training to field employees?

(65 answered)

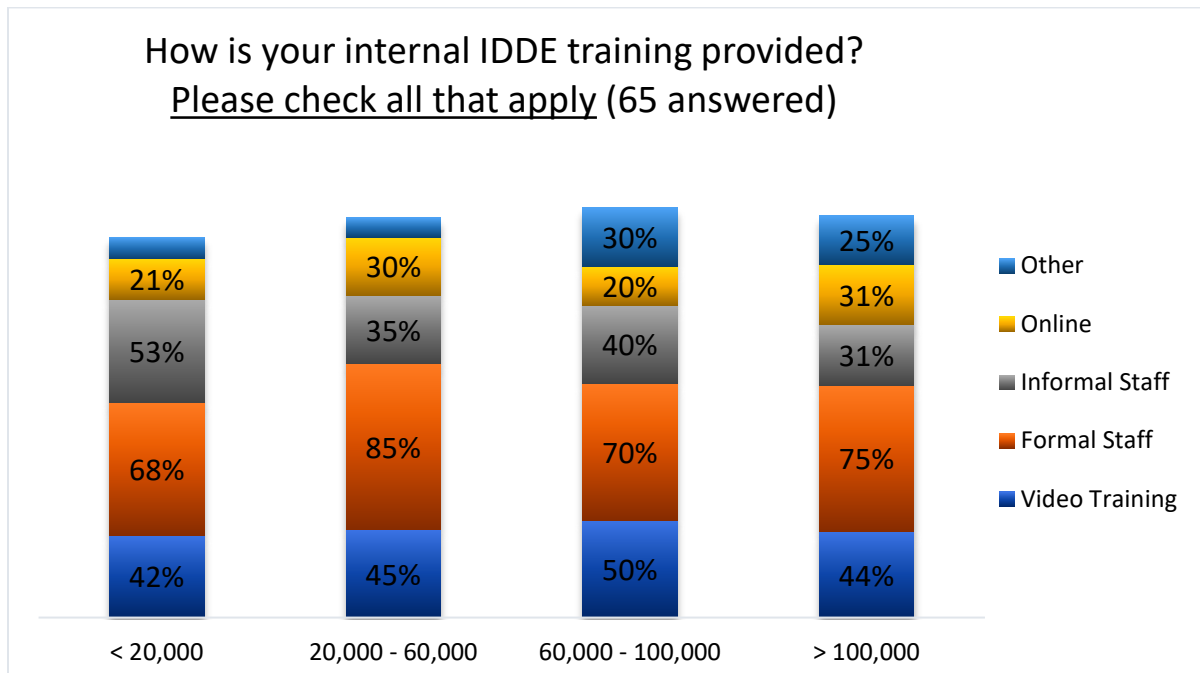
- < 20,000
 - 74% Internal staff
 - 21% Hired out to consultant/contractor
 - 5% Other
- 20,000 – 60,000
 - 60% Internal staff
 - 20% Hired out to consultant/contractor
 - 20% Other
- 60,000 – 100,000
 - 80% Internal staff
 - 20% Other
- > 100,000
 - 88% Internal staff
 - 6% Hired out to consultant/contractor
 - 6% Other



Q12: How is your internal IDDE training provided? *Please check all that apply*

(65 answered)

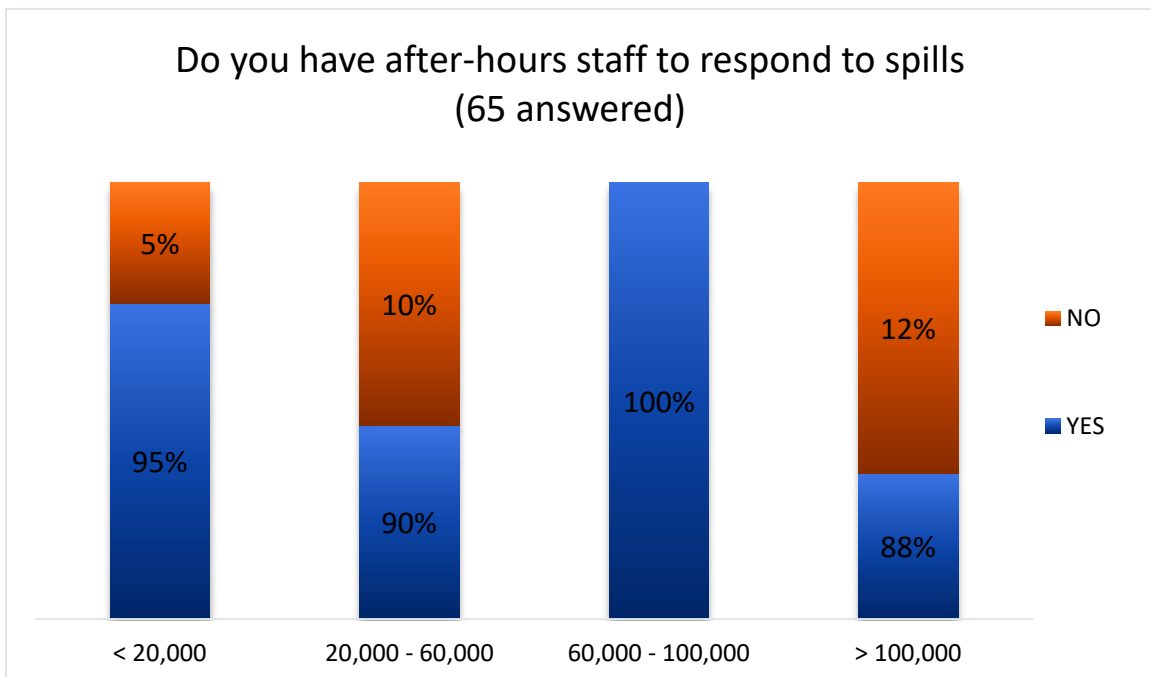
- < 20,000
 - 42% Video training
 - 68% Formal staff training
 - 53% Informal staff training as hired
 - 21% Online lesson/exam
 - 11% Other
- 20,000 – 60,000
 - 45% Video training
 - 85% Formal staff training
 - 35% Informal staff training as hired
 - 30% Online lesson/exam
 - 10% Other
- 60,000 – 100,000
 - 50% Video training
 - 70% Formal staff training
 - 40% Informal staff training as hired
 - 20% Online lesson/exam
 - 30% Other
- > 100,000
 - 44% Video training
 - 75% Formal staff training
 - 31% Informal staff training as hired
 - 31% Online lesson/exam
 - 25% Other



Q13: Do you have after-hours staff to respond to spills?

(65 answered)

- < 20,000
 - 95% Yes
 - 5% No
- 20,000 – 60,000
 - 90% Yes
 - 10% No
- 60,000 – 100,000
 - 100% Yes
- > 100,000
 - 88% Yes
 - 12% No



Survey Jurisdictional Summaries

< 20,000

- IDDE Program has less than 1 FTE
- Receives most WQ calls from internal staff (not emergency services) & customers
- Both jurisdiction maintenance staff and equipment and a combinations of jurisdiction maintenance staff and responsible party cleanup spills in MS4
- Jurisdiction maintenance staff and equipment primarily cleanup spill on streets & sidewalks, sometimes responsible party if identified
- Have authority to pursue fines but don't because it's difficult to implement
- Both do not pursue cost recovery and have authority but don't pursue.
- Inspectors (including ROW, Development, Building, CIP, but not including IDDE) respond to spills related to construction sites
- IDDE Program Staff report spills to Ecology
- Internal staff provide internal IDDE training to field employees through formal staff training and informal staff training as hired
- Majority have after-hours staff respond to spills.

20,000 – 60,000

- IDDE Program has ≤ 1 FTE
- Receive most WQ calls from internal staff (not emergency services), customers & ERTS
- Jurisdiction maintenance staff and equipment primarily cleanup spills in MS4
- Jurisdiction maintenance staff and equipment primarily cleanup spill on streets & sidewalks
- Have authority to pursue fines but don't because it's difficult to implement, sometimes do pursue
- Both yes, pursue cost recovery and have authority to pursue cost recovery but don't because it's difficult to implement
- Inspectors (including ROW, Development, Building, CIP, but not including IDDE) respond to spills related to construction sites
- IDDE Program Staff and Maintenance Staff report spills to Ecology
- Internal staff provide internal IDDE training to field employees through formal staff training
- Majority have after-hours staff respond to spills.

Survey Jurisdictional Summaries (continued)

60,000 – 100,000

- IDDE Program has less than 1 FTE
- Receives most WQ calls from internal staff (not emergency services), customers, & ERTS
- Combinations of jurisdiction maintenance staff and equipment and responsible parties primarily cleanup spills in MS4
- Jurisdiction maintenance staff and equipment primarily cleanup spill on streets & sidewalks, sometimes responsible party if identified
- Have authority to pursue fines but don't because it's difficult to implement
- Have authority to pursue cost recovery but don't because it's difficult to implement
- Inspectors (including ROW, Development, Building, CIP, but not including IDDE) respond to spills related to construction sites
- Both IDDE Program Staff and Maintenance Staff report spills to Ecology
- Internal staff provide internal IDDE training to field employees through formal staff training and video training
- Have after-hours staff respond to spills.

> 100,000

- IDDE Program has 2-3 FTE
- Receives most WQ calls from internal staff (not emergency services), customers & ERTS
- Both jurisdiction maintenance staff and equipment and combination of maintenance staff and responsible parties primarily cleanup spills in MS4
- Jurisdiction maintenance staff and equipment primarily cleanup spill on streets & sidewalks, sometimes responsible party if identified
- Have authority to pursue fines but don't because it's difficult to implement, sometimes do pursue sometimes
- Have authority to pursue cost recovery but don't because it's difficult to implement and sometimes pursue cost recovery
- Inspectors (including ROW, Development, Building, CIP, but not including IDDE) respond to spills related to construction sites
- Both IDDE Program Staff and IDDE Program and Maintenance Staff report spills to Ecology
- Internal staff provide internal IDDE training to field employees through formal staff training
- Majority have after-hours staff respond to spills.