

Illicit Discharge Detection and Elimination (IDDE)

Phase I and Western Washington Phase II Municipal Stormwater Permits

Proposed approach to update the IDDE tracking and reporting requirements for the 2019 permit reissuance.

I. Introduction

The Washington Department of Ecology (Ecology) is working on reissuing the Phase I and Western Washington Phase II Municipal Stormwater Permit. Ecology prepared preliminary draft permit language of specific permit sections and is accepting informal comments until midnight, January 15, 2018. Send your comments to: <http://ws.ecology.commentinput.com/?id=tkx29>

Or mail hard copies to:

Municipal Stormwater Comments
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

II. Proposal

This is a summary of several changes Ecology is proposing related to Permittees' IDDE permit requirements. Proposed permit language for the entire IDDE permit section will be released in spring 2018.

Proposed changes to Phase II permit requirements

1. Move mapping requirements from S5.C.3 to a new mapping section under S5.C..

Proposed changes to Phase I and WWA Phase II permits:

2. Proposed new Phase II S5.C.3.f / Phase I S5.C.8.g language in red:
 - Recordkeeping: Each Permittee shall track and maintain records of the activities conducted to meet the requirements of this section. In the annual report, each permittee shall submit data for all of the potential illicit discharges into their MS4, including spills and illicit connections, found by or reported to the Permittee during the previous calendar year. The summary shall include the information and formatting specified in WQWebIDDE. Applicable data shall be reported for all such potential incidents discharges, regardless of whether G3 notification was required, whether an illicit discharge was confirmed, or whether follow-up action was required by the Permittee. Each permittee may either use their own system or WQWebIDDE for recording this data. Final submittal must follow the schema described in WQWebIDDE.

Commented [AD1]: The permit section opens with "The SWMP shall include an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4." Is important to stay focused on this. Adding the clause "into their MS4" is a helpful reminder.

City of Kirkland Comments

Phase I and Western WA Phase II Municipal Stormwater Permit
Preliminary Draft Permit Section: IDDE tracking and reporting
10/3/17

Note to readers: An IDDE incident tracking and reporting annual report question is in the current permit. Ecology issued guidance for permittees to meet this requirement but it was used by few permittees. Ecology wants the requirement to be meaningful and useful. The Stormwater Work Group stakeholder committee involved permittees in providing helpful definition and clarity to the expected reporting requirements. Ecology's IT department is building a form in the web portal that is primarily intended for use by permittees with smaller numbers (approximately <50) of incidents. Permittees with their own data bases should have their IT departments take a look at the data schema provided with this informal draft permit language.

3. Revised annual report question Phase II Q20/ Phase I Q48:

Q20/48. Attach ~~a summary of~~ a zipped xml file with data describing the actions taken to investigate, characterize, trace and eliminate each potential illicit discharge found by or reported to the permittee. ~~For each confirmed illicit discharge, include a description of actions according to the required timeline per S5.C.3.d.vi/S5.C.8.d.iv.~~ The submittal must include all of the applicable information and must follow the schema described in WQWebIDDE.

4. Delete/remove annual report questions (PH II/PH I: Q15b/44b, Q19/47, and Q61/87.