

City of Bellevue Comments on Preliminary Draft NPDES Phase II Permit Language

January 18, 2018

S5.C.3. IDDE

- Please clarify “potential illicit discharges” and include language that specifies the discharge is into the City owned MS4.
- Will it be possible to see the IDDE reporting website that Ecology plans to set up ahead of the formal permit language review?
 - Can we get IDDE information back out of the system?
- And it would be helpful if Ecology can describe for us how they plan to use the IDDE information collected.

S5.C.3. Source Control

- Recommended that Ecology fully understands the financial burden of implementing a Source Control program and how that will affect the rates paid by our customers.
- In the preliminary fact sheet under item IV, it is mentioned that this program has been effective within Phase I permit coverage areas. Does Ecology have data to support that that they would be willing to share with the Phase II Permittees?
- Will sites that deny entry be allowed to be counted towards the 20% inspection goal?

S5.C.?. Mapping

- In a.iii; the proposed language has been changed from “Permanent Stormwater treatment and flow control BMP’s...” to “Permanent Stormwater facilities...”
 - How granular do you expect MS4 maps to be? Are facilities to be mapped still at the current level of structures (vaults, tanks, ponds) vs devices (dispersion pipes, energy dissipaters, etc....) Please clarify this definition by adding examples.
 - This also may apply to the maintenance and operations of facilities if it becomes required to begin maintaining devices at the level that currently applies to treatment and flow control BMP’s.