**Spokane County proposes that the following changes are made to the NPDES Phase II permit:**

Special Condition S5.B.6.a.ii.(a) should be revised to allow alternate inspection cycles based on inspection records for all stormwater treatment and flow control facilities.

Special Condition S5.B.6.a.ii.(b) should be revised to offer an additional alternative to the standard inspection approach that is based on the observed sedimentation rate which is demonstrated by inspection and maintenance records

Section S5.B.6.a.ii (see below) discusses the requirements for how often stormwater treatment and flow control facilities should be inspected. As it stands, all stormwater treatment and flow control facilities are to be inspected once every two years, and alternative approaches may be used only for catch basins. Spokane County proposes an alternative inspection schedule that relates directly to the observed maintenance needs of the facility.

Spokane County proposes that inspection records are kept identifying the average ‘sediment loading’ for drywells, catch basins, and maintenance junctions (manholes/pipe connections) and may be used to justify when the facility would require inspection. For catch basins and maintenance junctions (similar design to catch basins), the facility would need to be inspected when the sump is expected to be 50% full, which exceeds the maintenance criteria requirements in the SWMMEW for catch basins (Section 6A5. Table 6.18), which requires that they are maintained when the sump is 60% full.

Example 1: Catch basin A has a sump of 18 inches, and currently has no sediment. Past inspection records indicate that the facility receives 3 inches of sediment annually. The facility would be inspected once every 3 years, when the facility has 9 inches of sediment and is 50% full.

Example 2: Maintenance Junction B has a sump of 24 inches and currently has 4 inches of sediment. Past inspection records indicate that the facility receives 2 inches of sediment annually. The facility would be inspected in 4 years, when the facility has 12 inches of sediment and is 50% full, and cleaned accordingly. After cleaning, the facility would be inspected every 6 years.

Example 3: Drywell C needs to be cleaned (as determined by the municipality) once it has 15 inches of sediment and currently has 3 inches of sediment. Past inspection records indicate that the facility receives 3 inches of sediment annually. The facility would be inspected in 4 years, when the facility has 15 inches of sediment, and cleaned accordingly. After cleaning, the facility would be inspected every 5 years.

**Current Inspection Requirements from Permit**



