Spokane County Stormwater Utility

Please see attached documents (2) for comments.

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

ii. The O&M Plan shall include a schedule of inspections and requirements for recordkeeping pursuant to S9 – *Reporting and Recordkeeping.*

(a) A minimum of 95% of all known stormwater treatment and flow control facilities (except catch basins) owned, operated, or maintained by the Permittee shall be inspected at least once every two years, with problem facilities identified during inspections to be inspected more frequently.

(b) All catch basins and inlets owned or operated by the Permittee shall be inspected every two years.[16] Clean catch basins if the inspection indicates cleaning is needed to comply with the maintenance standards adopted pursuant to S5.B.6.a.

The following alternatives to the standard approach of inspecting catch basins every two years may be applied to all or portions of the system:

(1) The catch basin inspection schedule of every two years thereafter may be changed, as appropriate, to meet the maintenance standard based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records for catch basins, the Permittee may substitute written statements to document a specific, less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experiences and shall be certified in accordance with G19 – *Certification and Signature*.

(2) Inspections every two years may be conducted on a "circuit basis," whereby 25% of catch basins and inlets within each circuit are inspected to identify maintenance needs. Include in the inspection the catch basin immediately upstream of any system outfall, discharge point, or connections to public or private storm systems, if applicable. Clean all catch basins within a given circuit for which

the inspection indicates cleaning is needed to comply with maintenance standards established under S5.B.6.a, above.

(3) The Permittee may clean all pipes, ditches, catch basins, and inlets within a circuit once during the Permit term. Circuits selected for this alternative must drain to a single point.

(c) Spot checks for potentially damaged stormwater treatment and flow control facilities shall be conducted after major storm events. (24-hour storm event with a 10-year or greater recurrence interval) Any needed repair or maintenance shall be performed as soon as practicable pursuant to the findings of regular inspection or spot check.

Please issue clarification that “groundwater” as a “Waters of the State” is bounded by the saturation limits. Please issue clarification that discharge percolating through an unsaturated soil layer is not part of the “Waters of the State” until it reaches a defined boundary, such as the seasonal high-water table. Please issue clarification that discharge must meet groundwater standards when it reaches this boundary and becomes part of a Waters of the State.

Clarification is needed because RCW 90.48 names “underground waters” as a “Waters of the State.” It is easy to misinterpret “underground waters” as “any water below the soil surface.” However, the use of the collective noun “waters” as opposed to the general noun “water” indicates that the RCW is referring to a body of water that has a definable boundary (an aquifer, an underground river, a lake in a cave) and is not referring to moisture in a shallow soil layer.