

## **IDDE (S5.C5.b) Summary**

### **Response to 2021 Annual Report Question #33**

#### **Detection/Inspection/Enforcement**

In 2021, the City of Edmonds IDDE program documented 32 reported spills, connections, and/or discharges. This number is down from 37 IDDE's in 2020. The reduction of reported incidents is thought to be a direct result of the COVID-19 restrictions with people and businesses having reduced schedules and/or spending less time out in public to witness potential incidents. Of these documented IDDE incidents, 50% were reported by City of Edmonds employees while the remaining 50% were reported via the public hotline/email, businesses, or other agencies. A full list of IDDE issues for the year was uploaded to WQWebIDDE.

Overall, 2021 was a relatively standard year for IDDE investigations and management. City response to reported events was, again, very good as 32 of the 32 reports were addressed immediately on being notified of a potential incident. Of the 32 reported IDDE incidents, 3 were determined to have impacted the MS4 in some fashion. This is down from 12 the previous year. These incidents were addressed with BMP's and notifications to the offending resident or business when applicable. The rest were nuisance issues (which were not spills, but more 'source control' type issues), or were contained in place by City crews or first responders. None of these issues were determined to have reached receiving waters in observable quantities and required S4.F notification to Ecology. If a spill was to reach receiving waters, a notification would have been posted resulting in a request for an adaptive management plan. Any S4.F communications with Ecology are included as Attachment A.

Every IDDE case that was reported to the City of Edmonds, and where follow up contact information was available for the reported address or business, was also sent an educational and/or correction letter documenting the incident. These letters restate the incident as witnessed by the inspector and what steps are needed to restore and clean up the affected areas. The City of Edmonds takes an 'education first' approach, prior to enforcement actions; the Stormwater Department has been very successful in using this method to work with residents and businesses alike. Only in very rare instances have we had unresponsive or multiple occurrences of an IDDE occur.

Going into 2022, there will only be 1 carry-over IDDE issue from 2020-2021. This issue which is an IDDE case first reported to Department of Ecology in 2019, is regarding an ongoing polluted groundwater issue (COE IDDE # 19-043) which continues to require City resources to manage in place. The City has been maintaining an ongoing management of this condition using absorbent booms and pads, which has kept it from reaching the local receiving waters. In documenting the response, the City has undertaken stormwater sampling to identify the potential sources and has worked with Ecology toxics and spills response staff, but has thus far been unable to eliminate the source. While the City believes the historically polluted groundwater is beyond the scope of City authority, we are still expending resources to investigate, manage, and ultimately correct its

impacts to surface waters. It has been noted previously that this approach is not sustainable long-term.

### **Screening & Outfall Testing**

The City implemented a new IDDE screening method at the beginning of the permit cycle. In an attempt to make more significant progress in identifying illicit connections (and cross-bores) the City focused its efforts conducting screening with CCTV, making best use of the latest technology available in our new video inspection truck. 2021 was the third year of conducting a formal video inspection program. The video inspection work often requires traffic control in most locations and, therefore, requires more work force to conduct. It was also necessary to work within the COVID-19 protocols, as schedules shifted to meet safety and emergency needs. This program needed to be some of the earliest work to be sacrificed to redirect manpower. The program was rolled out in an effort to attempt to hit the minimum percentage each year, but with the current plan to continue the traditional method of “look-and-lift” at catch basins as a fall back.

In 2021, the City was able to video approximately 20,834 linear feet of the piped system. This footage is substantial for a City that currently has very limited video inspection of its system completed; it has led to discovering several issues which required attention and will also be used to drive some decision making in the Stormwater Comprehensive Plan Update. However, it has become clear that the City cannot maintain this program at the minimum levels required to satisfy IDDE screening requirements. Thus, the City will continue to run its video inspection program as much as feasible, but IDDE screening for the sake of the permit reporting, will remain the “look-and-lift” method performed during catch basin inspections.

With the established “look-and-lift” method, the City performed screening at 2,673 catch basins and manholes, which represented roughly 32% of the storm system based on catch basin/manhole quantities, and well above the permit minimum of 12%. However, a G-20 letter has been submitted as the City’s maintenance program has not meet the minimum maintenance requirements over the course of the three-year ‘alternative schedule’.

Additionally, on September 16<sup>th</sup>, the City’s stormwater technician also took part in the screening process by participating in the Ecology required IDDE program for Dry Weather Outfall Screening. The stormwater technician prioritized the drainage basins of Shell/Hindley Creek and the Puget Sound Piped (South). The technician used screening parameters outlined in the Herrera 2013 manual. In total, 8 outfalls were screened over the course of one day where no potential sources of IDDE issues were discovered. New drainage basins within Edmonds will be identified and screened for 2022.

### **Training/Internal Education**

In 2021, the City continued efforts to inform and train employees as well as citizens and businesses in illicit discharge detection and elimination albeit with the restrictions the City was faced with as COVID-19. This educational process stresses the important topics of spill

prevention and response. With several new employees in both the Public Works and Parks departments these past years, refresher IDDE talks, and trainings were conducted for field staff by the supervisors of both the Parks and Public Works Departments. Additional SWPPP guidance was also provided for lead workers. This provided both a reminder in identifying and handling environmentally sensitive situations as well as instruction on the proper reporting of a spill/discharge. With updated SWPPP's for the two Public Works yards and the Parks operations facility, operations crews received a refresher of the best management practices and routine preventive steps that need to be taken in the yard to adequately protect surface waters. With monthly yard inspections, lead workers reported that at years end, no substantive spills had taken place within their yards to warrant response or follow up actions. It is also of note, that spill kits at both yards were thoroughly gone through and restocked this year. In years prior, staff have also developed and had success with a peer-led training programs that requires individual crewmembers to become trainers for a day. This program will continue into 2022 with continued COVID-19 safety measures. Crewmembers that act as first responders to spills and discharges will also continue to attend sponsored IDDE classes outside of the City of Edmonds.

### **Public/Business Education**

The ECOSS spill kit program also continued in 2021. Since 2013, the *Environmental Coalition of South Seattle* has been a partner with the City in educating and training local businesses on spill response and prevention. This past year the City of Edmonds identified businesses along the Highway 99 corridor as well as near downtown Edmonds to make initial visits and revisit due to past IDDE documentation, new occurrences of discharge as well as potential for illicit discharge. From January through December 2021, 12 businesses were identified and contacted by ECOSS. Of those 12, all 12 businesses accepted their services; A full annual report of the ECOSS program is available as Attachment B. Since 2013, ECOSS has served 217 local Edmonds businesses with spill kits and spill prevention materials. This program was renewed for 2022 where the City has high hopes to return the program to its full potential and continue this valuable outreach.

# **Attachment A**

## **S4.F Communications**

# **Attachment B**

## ECOSS Annual Report