

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

### **Response to 2023 Annual Report Question #33**

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

In 2023, the City of Edmonds IDDE program documented 26 investigations of reported spills, connections, and/or discharges. This number is down from 29 IDDE's in 2022. The moderate decrease of reported incidents is thought to be optimistic, as staff and citizens seem to know where to report probable offenses to, yet fewer incidents is always a positive. Of these documented IDDE incidents, 15% were reported by City of Edmonds employees while the remaining 85% were reported via the public hotline/email, businesses, ERTS, or other agencies. A full list of IDDE issues is attached to the NPDES Permit submittal.

Overall, 2023 was a relatively standard year for IDDE investigations and management. City response to reported events was, again, very good as 26 of the 26 reports were addressed promptly on being notified of the potential incident. Of the 26 reported IDDE incidents, 20 were determined to have impacted the MS4 in some degree. 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. Only 1 of these issues were determined to have reached receiving waters in observable quantities and required an 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 2024, there will only be 1 carry-over IDDE issue from 2023. This issue, which is an IDDE case first documented in March of 2021, is regarding an ongoing resident who continues to intentionally litter which pollutes the nearby creek. (IDDE #85) This issue continues to require the City's resources to document and manage. The City has been maintaining an ongoing management of this condition using crews to document and clean the litter when found.

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. 2023 was the fifth 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, while highly beneficial, is also 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 2023, the City was able to video approximately 9,756 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 5088 catch basins and manholes, which represented roughly 58% of the storm system based on catch basin/manhole quantities, and well above the permit minimum of 12%.

Additionally, on September 24<sup>th</sup> the City’s Sr. Stormwater Engineering 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 Good Hope Pond, Fruitdale Creek, Westgate Pond, Lund’s Gulch, Puget Sound Piped North, Meadowdale A and Talbot Park B. The stormwater technician used screening parameters outlined in the Herrera 2013 manual. In total, 10 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 2023.

### **Training/Internal Education**

In 2023, the City continued efforts to inform and train employees as well as citizens and businesses in illicit discharge detection and elimination. 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 again conducted for field staff by the supervisors of both the Parks and Public Works Departments and the Sr. Stormwater Engineering Technician. 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 2024 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 spill kit program also continued in 2023. However, our partner since 2013, ECOSS (*Environmental Coalition of South Seattle*) was replaced by Aspect Consulting. This new partner will continue to work alongside the City in educating and training local businesses on spill response and prevention. This past year, the City of Edmonds largely identified businesses along the Highway 99 corridor to make initial visits and revisits due to past IDDE documentation, new occurrences of discharge, as well as potential for illicit pollution discharge. From January through December 2023, 15 businesses were identified and contacted by Aspect Consulting. Of those 15, all 15 businesses accepted their services; A full annual report of the Aspect Consulting program is available as Attachment B. Since 2013, the spill kit program has served 247 local Edmonds businesses with spill kits and spill prevention materials. This program has every intention of continuing in 2024 and beyond.

# **Attachment A**

## **S4.F Communications**

# **Attachment B**

## ECOSS Annual Report