CITY OF SPOKANE VALLEY
IDDE PROGRAM PLAN

City of Spokane Valley
Public Works Department
Stormwater Utility

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Document to fulfill NPDES Permit Requirements S5.B.3.c

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Chapter 1 – Introduction and Overview

Regulatory Overview

The city's municipal stormwater system is regulated by both the Eastern Washington Phase ll Municipal Stormwater Permit (MS4 Permit) and the UIC Program, WAC 173-218. The MS4 Permit regulates municipal stormwater systems that discharge to surface waters. The UIC program regulates municipal stormwater systems that subsurface discharge to UICs (drywells).

The city has chosen to operate under separate Stormwater Management Programs (MS4 and UIC SWMP) so that it can most efficiently manage it stormwater systems and protect both surface and groundwaters. Under the MS4 SWMP, the following program is regulated by requirements covered in section S5.B.3, Illicit Discharge Detection and Elimination. Under the UIC SWMP, the following program supplements the source control requirements identified in the city's UIC SWMP, the UIC O&M plan, and as described in chapter 8 of the Stormwater Management Manual for Eastern Washington.

For the purposes of this document:

- Illicit discharge detection and elimination and source control are considered illicit discharge and elimination (IDDE).
- Municipal separate stormwater systems (MS4) and UIC municipal stormwater systems are considered municipal stormwater systems.
- Requirements specific to the municipal separate storm sewer system (MS4) is considered MS4.

Introduction

For the purposes of this program, an illicit discharge (ID) is when substances containing pollutants or pathogens that are harmful to the environment are discharged to a stormwater system, surface waters or groundwaters. Illicit discharges can vary in severity depending on the characteristics of the discharge and the quantity, constituents, duration, and location of the discharge. An Illicit Connection (IC) is a piped illicit discharge and is typically a cross connection to a storm drain system from sewer system or commercial/industrial floor drains. Preventing and stopping ID/ICs helps to protect the local streams, rivers, and the aquifer as well as keep the city a healthy and safe place.

This document is intended as both a summary of the City's Illicit Discharge Detection and Elimination (IDDE) Program and act as the resource manual that documents internal procedures for responding to, investigating, tracing, reporting, and eliminating illicit discharges or illicit connections.

This document serves as a living-document and will be updated on an as-needed basis.

Program Goals

The overall goals of the program are to:

1. Meet regulatory requirements.
2. Identify, prevent, or stop actual and potential ID/ICs from harming local surface and groundwaters.
3. Document procedures for responding to hazardous/emergency and non-hazardous/ emergency spills within city limits.

4. Educate the public on the state laws and local codes for allowable, conditionally allowable, and prohibited discharges into stormwater and natural waterbody systems.
5. Utilize enforcement procedures to cause behavioral change or, if necessary, abate and remediate water quality threats to city-owned stormwater systems.
6. Notify other authoritative agencies of IDDE cases they are responsible for regulating.

Definitions and Acronyms

The Eastern Washington Phase II Municipal NPDES Stormwater Permit defines the following terms which are helpful in comprehending this plan.

Conveyance System - that portion of the municipal stormwater system designed or used for conveying stormwater.

Groundwater - water in a saturated zone or stratum beneath the surface of the land or below a surface water body. Refer to Chapter 173-200 WAC.

Hazardous Substance - any liquid, solid, gas, or sludge, including any material, substance, product, commodity, or waste, regardless of quantity, that exhibits any of the physical, chemical, or biological properties described in WAC 173-303-090 or WAC 173-303-100.

Illicit Connection - any infrastructure connection to the municipal stormwater system that is not intended, permitted, or used for collecting and conveying stormwater or non-stormwater discharges allowed as specified in this Permit (S5.B.3 and S6.D.3). Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the MS4.

Illicit Discharge - any discharge to a municipal stormwater system that is not composed entirely of stormwater or of non-stormwater discharges allowed as specified in this Permit (S5.B.3 and S6.D.3).

Municipal Separate Storm Sewer System (MS4) - means a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains). Regulated by the Eastern Washington Phase ll Municipal Stormwater Permit.

Municipal Stormwater System – means all stormwater facilities and structures owned, operated and maintained by the city.

NPDES - National Pollutant Discharge Elimination System.

National Pollutant Discharge Elimination System - the national program for issuing, modifying, revoking, and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 402, 318, and 405 of the federal Clean Water Act, for the discharge of pollutants to surface waters of the State from point sources. These permits are referred to as NPDES permits and, in Washington State, are administered by the Washington State Department of Ecology.

Outfall - point source, as defined by 40 CFR 122.2, at the point where a discharge leaves the MS4 and enters a surface receiving waterbody or surface receiving waters. Outfall does not include

pipes, tunnels, or other conveyances which connect segments of the same stream or other surface waters and are used to convey primarily surface waters (i.e., culverts).

Runoff - water that travels across the land surface, or laterally through the ground near the land surface, and discharges to waterbodies either directly or through a collection and conveyance system. See also "Stormwater."

Stormwater - runoff during and following precipitation and snowmelt events, including surface runoff, drainage, or interflow.

Surface Waters - includes lakes, rivers, ponds, streams, inland waters, salt waters, and all other surface waters and water courses within the jurisdiction of the State of Washington.

Waters of the State - includes those waters as defined as "waters of the United States" in 40 CFR 122.2 within the geographic boundaries of Washington State and "waters of the State" as defined in Chapter 90.48 RCW which includes: lakes, rivers, ponds, streams, inland waters, underground waters, salt waters and all other surface waters and water courses within the jurisdiction of the State of Washington.

MS4 Permit IDDE Regulations

The Eastern Washington Phase II Municipal Stormwater (MS4) Permit Section (Permit) S5.B.3 for Illicit Discharge Detection and Elimination (IDDE) requires permittees to have a program designed to "prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4." The following is a summary of requirements under this Permit section. Please see the Permit for all requirements under this section.

<u>Summarized Requirements:</u>

- Mapping requirements
    - Known outfalls and discharge points (MS4 areas)
    - Receiving Waters
    - Areas that discharge to ground (UIC areas)
    - Stormwater facilities
    - *Connections to the city's municipal stormwater system approved or built after August 1st, 2019
    - Connections from the MS4 to private stormwater systems
    - Connections from the MS4 to other MS4s owned by municipalities or public entities
    - Tree canopy on city-owned property, including right-of-way (due no later than 12/31/2026)
    - Tributary conveyances to known outfalls with a diameter of 24 inches or greater, or equivalent cross-sectional area for non-piped outfalls, providing information on conveyance type, size, and material, associated drainage area, and land use (due no later than 12/31/2027)
    - Map overburdened communities as defined in the Permit (due no later than 12/31/2028)

*The city does not allow connections from private stormwater systems to city stormwater systems.

- Ordinance requirements and allowed, conditionally allowed, and prohibited discharges. Oridinance updates from the 2024-2029 MS4 permit are required to be updated before July 1, 2027.
- Field assessment and screening elements
    - Investigation Procedures
    - Priority area inspections
    - Outfall inspections
    - Field training
- Required general IDDE program elements
    - Coordination with local firefighting agencies for post-emergency clean-up and disposal activities (See Chapter 4 Emergency or Hazardous Spill Section)
    - Procedures to characterize illicit discharges
    - Tracing and eliminating procedures
    - IDDE investigation timelines
- Training
- Recordkeeping

Discharges Allowed, Conditionally Allowed, and Prohibited

The MS4 Permit provides a list of discharges that are allowed, conditionally allowed, and prohibited and requires the permittee to establish ordinances which prohibits discharges of non-stormwater to the MS4. The City's Municipal Code (SVMC 22.150.110) reflects these discharge types and enforcement measures. Updates to the 2024-2029 MS4 permit include new regulations on discharge types but are currently not reflected in the cities municipal code, but will be updated no later than July 1st, 2027. ID/ICs are a violation of this City code. Under SVMC 22.150.110, the following discharge types are established:

22.150.110.a – Allowable Non-Stormwater Discharges

1. Diverted stream flows;

2. Rising ground waters;

3. Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20));

4. Uncontaminated pumped ground water;

5. Foundation drains;

6. Air conditioning condensation;

7. Irrigation water from agricultural sources that is commingled with urban stormwater;

8. Springs;

9. Uncontaminated water from crawl space pumps;

10. Footing drains;

11. Flow from riparian habitats and wetlands; and

12. Emergency firefighting activities.

22.150.110.c – Prohibited Unless Conditions Are Met

1. Surface water containing sediment;

2. Water discharged from the cleaning of containers or equipment used in laying, cutting, or processing concrete and mortar and the water used in such processes;

3. Water discharged from the cleaning of equipment or containers holding paint solvents or similar contaminants;

4. Other water posing a safety hazard in the travel way or that could reduce the effectiveness of stormwater control and treatment facilities;

5. Discharges from potable water sources, including water line flushing, hyper chlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water. Planned discharges shall be dechlorinated to a concentration of 0.1 ppm or less, PH-adjusted if necessary, and volumetrically and velocity controlled to prevent resuspension of sediments in the public drainage system;

6. Discharges from lawn watering and other irrigation runoff shall be kept to a minimum and shall not cause damage to public streets or sidewalks;

7. Swimming pool, hot tub and spa discharges shall be dechlorinated to a concentration of 0.1 ppm or less, pH-adjusted and reoxygenated if necessary, and volumetrically and velocity controlled to prevent resuspension of sediments in the public drainage system. Swimming pool cleaning wastewater and filter backwash are prohibited;

8. Street and sidewalk wash water, water used to control dust, and routine external building wash down shall not contain soaps or detergents and shall be kept to a minimum. Practices shall be implemented prior to washing to reduce pollutants from entering the public drainage facility including but not limited to sweeping, picking up litter and controlling velocity of discharge; and

9. Other non-stormwater discharges shall be reviewed by the City for compliance with applicable regulations, required permits, and the approval of a pollution prevention plan from the authorizing governing agency.

Spokane Valley MS4 and Outfall Overview

The City of Spokane Valley has a population of around 108,000 and encompasses about 38 square miles. Located just east of the City of Spokane, the city shares its boundaries with Spokane County and the cities of Spokane, Millwood, and Liberty Lake.

The city sits on top of the Spokane Valley-Rathdrum Prairie Aquifer and is considered one of most productive aquifers in the country. Most of the city is composed of very deep and well-draining Garrison and Springdale soils and therefore stormwater has primarily been managed through infiltration into the sub-surface through drywells. In 2023, the city completed a study to model surface flows during the 100-year flood event. In the model, only about 2.5% of the city drains to surface waters and is considered by the city as the only areas of the Permit-defined MS4 areas. There are currently 30 outfall points within the city. See **Appendix A** with a map of MS4 areas.

IDDE Training

All city staff working for the city who might come in contact with or observe an ID/IC take IDDE training annually. Training materials specific to Spokane Valley have been developed by Stormwater Utility (Utility) staff and are divided into basic training for most field staff and enhanced training for Utility staff. Basic training covers:

1. Purpose of training
2. What is an illicit discharge
3. What is an illicit connection
4. Conditionally allowed and allowed discharges
5. Hazards associated with IDs/ICs
6. Spokane Valley Municipal Code
7. Basic indicators
8. Illegal dumping
9. Spill response and reporting procedures
10. Response Timelines

Enhanced training goes into more detail where Utility staff are required to respond, investigate, report, and follow-up with IDDE cases. This training includes additional information on:

1. MS4 Permit Requirements
2. Investigative Methods
3. Advanced level indicators
4. Emergency and non-emergency spill response plans and responsibilities

Chapter 2 – Field Screening and Source Tracing

Introduction

This chapter covers the procedures for field screening and source tracing methods to identify, detect, and characterize an ID/IC. The primary staff responsible for the actions in this chapter are stormwater field staff, however, other trained staff or contractors of the city can perform field screening. Since City ordinances only effectively prohibit ID/IC to city-owned facilities, any ID/IC cases that are on private property are the responsibility of other agencies, such as the Spokane County Health District or the Department of Ecology. Both field screening and source tracing are only two steps taken by the City in its IDDE Screening, Tracing, and Response Plan (Appendix B). Chapter 3 will go into more detail on how and when field screening and source tracing methodologies are used when the city identifies and responds to ID/IC cases.

IDDE Field Screening Methodologies

ID/ICs are typically typically identified through two primary methods. The most common reports come from citizens or field staff. The other method is field screening methodologies, which are different screening methods performed by field staff looking for evidence of ID/IC indicators in the field.

The MS4 permit requires field screening of at least 12% of the MS4 annually. Since the city's MS4 is a relatively small area, achieving this requirement alone can be completed very easily and alone is not effective in ID/IC screening for the entire city stormwater system. Below listed are different methodologies the city implements for ID/IC screening and applies city-wide.

Screening Through Routine Inspection of Storm Drains and Outfalls

The city primarily conducts screening for ID/ICs through annual inspections of the municipal stormwater system. When any structure is inspected or maintained, city staff or contracted personnel are trained to identify and report any potential ID/ICs to stormwater staff for further investigation. Mostly, this is done through inspection of the following municipal stormwater system structures:

- Catch basins
- Drywells
- Swales
- MS4 outfall inspections

Inspection frequencies depend on asset type and whether they are in MS4 Permit-regulated areas. For specific inspection frequencies see each of the City's MS4 and UIC Operation and Maintenance Plans.

Inspections are documented using ArcGIS Fieldmaps. Each structure inspected is documented as an inspection record in a related table. Attributes for each inspection allows the inspector to note if there is an ID/IC and a notes field to explain if any non-stormwater substances are found, if any. If a potential ID/IC is found, City stormwater staff will follow the City's IDDE Screening, Tracing, and Response Plan in **Appendix B**. For spills, see **Appendix C.**

Annual IDDE field assessment inspections will begin each year sometime after April 1st depending on seasonal weather conditions. Utility staff will either conduct or assign inspections to other trained staff or contractors. Inspections will be documented using ArcGIS Fieldmaps mobile applications in an inspection related table record. Each inspection will note if ID/IC is present, along with other conditions relative to routine inspection information such as the presence of sediment, debris, damage, or other corrective measures needed. Inspection frequencies, counts, and responsibilities can be found in the City's MS4 and UIC Operation and Maintenance Plans. Utility staff will take the following steps to assign, complete, and review inspections:

1. "InspectionYear" field is populated in ArcGIS for each asset to inspect.
2. AcrGIS Fieldmaps is configured with a filter to only show structures assigned to be inspected for the current year. This includes catch basins, drywells, inlets, stormwater facilities, and outfalls.
3. Field staff complete inspections using the inspection-related tables. Any IDDE evidence is noted and stormwater staff are notified immediately.
4. Field staff review inspection records in ArcGIS and schedule any corrective maintenance actions needed.

Screening Arterials Through Routine Maintenance

Part of the cities stormwater operation and maintenance program is biennial maintenance of catch basins on arterial streets. Each year, approximately 1,000 catch basins on either East-West (odd years) or North-South (even years) arterial streets are maintained by a contractor, accompanied by a city streets inspector. The street inspector uses this opportunity to visually inspect and look for any indicators of an ID/IC. Most IDs are sources of vehicle fluids such as oil, gasoline, diesel, or other liquids from presumed vehicle collisions. Spill response procedures are covered in Chapter 4.

Screening "Priority Areas"

MS4 Permit Section S5.B.3.c.ii directs:

> *"Procedures for locating priority areas likely to have illicit discharges, including, at a minimum: evaluating land uses and associated business/industrial activities present; areas where complaints have been registered in the past; and areas with storage of large quantities of materials that could result in illicit discharges, including spills."*

The City has identified municipal stormwater systems catch basins and drywells that have a higher potential for major ID/ICs or water quality impacts to surface and groundwater. A total of 55 catch basins and 52 drywells have been identified and tagged for annual screening inspections which would be in addition to a routine inspection frequency already assigned to each. Locations were decided primarily on one or more of the following factors:

1. Critical location upstream from an MS4 outfall
2. Located in Industrial zoned areas
3. End of line to larger storm conveyance networks
4. No pretreatment to a UIC

Screening inspections will be conducted during dry weather to better identify spills or illicit connections.

To see "Priority Areas" Screening Locations, see **Appendix A.**

Screening Through Daily Work Activities

All city staff who work in the field and may encounter an ID/IC have been trained on the basic identification of non-stormwater discharges that are conditionally allowed or prohibited. They are trained to incorporate IDDE training into their routine daily work activities. This approach is simple, but very effective in finding cases where there are ID/IC cases.

Source Tracing Methodologies

Source tracing methods are different ways which the City investigates the originating source of an ID/IC when a source is unknown. Source tracing can be simple. For example, if oil sheen in discovered in a drywell, trace the upstream conveyance system to a discharge source, such as a nearby parked car with leaking oil. Source tracing can also take more complex and difficult methods, like video inspection of a storm drain to look for a potentially cross-connected sewer line. The following are the primary source tracing methods used by the City.

Storm Drain Inspections

If a storm drain contains pollutants, staff will look for visual, olfactory, or other indicators, like pH testing, to confirm an ID/IC. If the source is unknown, staff will inspect structures upstream all conveyances to see if ID/IC indicators are present. Staff will follow all conveyances with the same ID/IC indicators until a source is found, or until indicators end and other tracing methods are needed.

Business Inspections

If source tracing leads to evidence that the initial source is coming from a private commercial or industrial property, then a business inspection is warranted. Stormwater staff should reach out to the Spokane County Health District Environmental Public Health (Vikki Barthels @ 509-324-1475) for information on any history with the site and a joint inspection. Depending on the severity of the ID/IC case and the discharge location, staff should contact the Department of Ecology (509-329-3400) for jurisdictional authority on private property.

Video Inspections

Video inspection is contracted inspection work to CCTV storm drain lines where visual inspections without confined space entry is not possible. Typically, video inspections are used to confirm an illicit connection to a storm drain from a private piped connection. Most privately piped illicit connections are from sanitary sewers, yard drains that are conveying non-stormwater discharges, or commercial/industrial wash and catchment bays.

Dye Testing

Dye testing is used to confirm a connection downstream where there is active flow. Dye tablets or liquid is added to a flowing source, which changes the color of the flow to usually a bright green, yellow, or pink color, which can be traced downstream to confirm a connection. This method is rarely used by the City.

Smoke Testing

Primarily used in sanitary sewer systems, smoke testing is when smoke and air are pumped into a enclosed system. Smoke can enter the system and help visually locate connected systems or cracks/voids that may be a potential source or pollutants. Smoke testing is also rarely used by the City.

Identification of Pollutants

All staff will use IDDE training guidance and general knowledge to identify the source and type of contaminants found in IDDE instances. In the event that the pollutant type is unknown, Utility staff will refer to the Illicit Connection And Illicit Discharge Field Screening And Source Tracing Guidance Manual to help confirm pollutant types.

If a contaminant is still unknown and analytical testing is needed, the city will take samples of the polluted stormwater and have it tested at Eurofins Environmental Testing Center – Spokane at 11922 E 1st Ave in Spokane Valley. Depending on the tests run, results usually take 5-7 days to be received after samples are taken and given to the lab.

When a pollutant type is known, this can help with tracing the source of the pollutant and will impact where the polluted stormwater can be disposed of.

SAMPLES BEING TAKEN OF SEDIMENT IN A CATCH BASIN.

SAMPLES DELIVERED TO EUROFINS LAB IN SPOKANE VALLEY.

Chapter 3 – Illicit Discharge and Connection Response Plan

This section guides the steps City staff should take when responding to a potential or finding an actual ID/IC. When an actual illicit discharge is found, the city will work to identify the polluter/violator, provide stormwater education, clean up and remedy the pollutant, and use progressive enforcement procedures as needed. Response and deadlines for clean-up varies depending on the ID/IC situation.

The Illicit Discharge and Connection Response Plan is outlined in the IDDE Screening, Tracing, and Response Plan (Appendix B) and should be used when any of the following conditions are present:

1. The city has become aware of a potential or actual ID/IC.
2. The flow is intermittent, continual, or there are indicators of an ID/IC with no flow.
3. The pollutant type and source are unknown.
4. The illicit discharge is not an active or recent spill.

In the case that an ID/IC case presents a situation that does not fit the processes outlined in the Illicit Discharge and Connection Response Plan, city staff will use the best available knowledge and resources to identify, detect, and eliminate any pollutant with actual or potential discharge to storm, surface, or groundwaters. The city can contact Ecology if they need assistance or guidance on moving forward with ID/IC cases.

POOL WATER DISCHARGE WITH HIGH CONCENTRATION OF GREEN ALGAE BEING DISCHARGED TO THE RIGHT OF WAY.

Response Times to Investigate

The NPDES permit has set deadlines for how soon the city needs to respond after information is known to the city of an actual or potential ID/IC. The below chart outlines the response deadlines.

Illicit Discharge or Connection Investigation Response Deadlines	
Response Time	**Type**
Immediately	ID/ICs and spills which are a threat to human health, welfare, or the environment (G3). Follow the Spill Response plan for all Spill Events.
Within 7 Days	Complaints, reports, or information indicating potential illicit discharge
Within 21 Days	Report or discovery of a suspected illicit connection

The City prioritizes any potential ID/IC case and will attempt to respond immediately depending on circumstances involving safety, access to properties, and staff resources regardless of the allowable deadlines for response.

Pollutants and Private Property

City code SVMC 22.150.110 prohibits non-stormwater discharges to the municipal stormwater system and to waters of the state. If pollutants originate from private property and are impacting city-owned stormwater facilities/systems, then the city will take steps to educate, eliminate, and potentially use progressive enforcement to stop the illicit discharge. The city will notify the Spokane Regional Health District Business Inspectors at (509) 324-1475 and the Department of Ecology (509) 329-3400 if pollutants are discharged to private property and private drainage systems and are not impacting city-owned stormwater facilities.

WASH WATER FROM A PRIVATE BUSINESS DISCHARGING INTO A PRIVATE DRYWELL.

Steps To Take If the Polluter Is Identified

Prior to progressive enforcement procedures, city staff with begin with educating polluters of the impacts of pollutants on water quality and the regulations prohibiting ID/ICs. If the polluter is identified, city staff will attempt to contact the person(s) either through an on-site visit or through a written letter. Staff will provide educational material and information such as the "Only Rain in the Drain" Flyer.

Depending on the situation, staff can involve city code enforcement officers or law enforcement if staff determine a potential for a hostile confrontation or unsafe location. If the illicit discharge is a reoccurring or continual event, staff will work with code enforcement to begin progressive enforcement procedures.

Steps To Take If Polluter Cannot Be Identified

Many times, a polluter cannot be identified because there is not sufficient evidence that points to a responsible party. The most frequent example would be when a pollutant, typically motor vehicle oils, paints, or fats, oils, grease (FOG) is dumped in the right of way and the responsible party is potentially a close adjacent resident or business. In this case, staff will send a letter to the surrounding properties (usually 4 – 8 properties) providing information about IDs and educational material to hopefully create a behavior change and prevent future violations. Staff will also leave "Only rain in the drain" door hangers at surrounding properties when appropriate.

Progressive Enforcement

SVMC 17.000 describes city enforcement procedures for violations of city Stormwater Management Regulations in SVMC 22.150. Prior to official code enforcement actions, stormwater staff will attempt to educate and usually, clean up any pollution in the right of way. If a violator is known and illicit discharge continues, the city will work with code enforcement staff to handle official code enforcement procedures described in Chapter 17.100 SVMC. Since incorporation, the city has had very few cases where official code enforcement procedures are needed to stop ID/ICs. The general procedures for progressive enforcement

are listed below. Please see Chapter 17.100.030 SVMC for a list of all actions the city can take to discourage or promote compliance with city code and stop an ID/ICs.

1. Educate the responsible persons of stormwater violation
2. Provide warning notice pursuant to SVMC 17.100.050. No warning issues for emergencies, repeat violation cases, or cases unlikely to be resolved in 72 hours.
3. Notice and order and stop work order sent or posted at property.
4. City applies civil penalties to responsible party (17.100.250-290)
5. City abates and remedies stormwater pollution and illicit discharge and connection and charges costs to responsible party (17.100.300).

City Reporting and Recordkeeping

The Department of Ecology has reporting requirements for spill in the MS4. The city stormwater program coordinator will be the primary staff for reporting to outside agencies. In general, if a spill or discharge occurs, staff should use their best judgement to notify the Department of Ecology. There are no penalties for reporting spills unnecessarily, but there may be significant penalties for not reporting one. Staff should report by phone first for any spill to water, then submit on the Department of Ecology Statewide Environmental Reports Tracking System (ERTS).

For discharges, including spills, to the municipal stormwater system which could constitute a threat to human health, welfare, or the environment, the city is required **to notify the Department of Ecology within 24 hours** of obtaining knowledge of the discharge. Staff should call first (1-800-645-7911), submit an ERTS.

If the spill or discharges are oils or hazardous substances, the city must **immediately notify the Department of Ecology and the Washington Emergency Management Division at 1-800-258-5990.** Oil spills to ground only must be reported to the Department of Ecology within 90 days, but the city should report these as soon as possible.

For illicit discharges or connections to the MS4 that also discharge downstream to a receiving waterbody, the City is required to provide a written notification to the Department of Ecology.

Any spill or IDDE case to the MS4 should be entered into Ecologies WQwebIDDE portal. Reporting information can be found in in the MS4 Permit Appendix 7 - IDDE Reporting Data and Format. This information will be documented in the MS4 annual report.

Disposal of Contaminants

Analytical test results will determine where contaminated soils or stormwater will be disposed of. If contaminated levels exceed any threshold which classifies the waste as dangerous waste (173-303 WAC) or hazardous waste (RCW70.A.300.010), then waste will be vactored and disposed of by Able Cleaning (on-call hazardous waste clean-up). If waste contains raw sewage, AAA Sweeping can dispose of this waste.

Chapter 4 – Spill Response Plan

Spills are unplanned releases of materials and are a common form of illicit discharge. Spills events can widely vary depending on the severity of the situation. Quantity, type, location, and the possible/actual threat to health and/or the environment will all drive the response for containment and clean up.

The City has generalized spills into two categories: Emergency/hazardous spills and non-emergency/non-hazardous spills. See the Stormwater Spill Response Plan (**Appendix C)** for a flowchart for communication and actions for spills within the City. The Stormwater Spill Response Plan should be used for spill events only. See **Appendix B** for IDDE Screening, Tracing, and Response Plan for procedures when a pollution frequency is intermittent, continual, and/or the source is unknown.

Emergency or Hazardous Spills

Emergency spills are situations where a spill is involved in an emergency that involves fire, paramedic, police, or other first responders where there are human safety concerns. Typical emergency spills deal with vehicle collisions or firefighting incidents. Just as emergency situations vary in severity, so also are the severity of emergency spills.

Hazardous spills can also be emergency spills but involve spills that are large quantities of hazardous or dangerous materials and can be an actual or potential threat to human health, safety, or the environment. Recent examples from Washington state include:

1. Mineral oil sheen on the Spokane River from the Inland Empire Paper Company from equipment failure (Dec. 26, 2023)
2. A derailed BNSF train overturned and three cars containing crude oil leaked and caught fire near Custer, WA (Dec. 22, 2020).
3. A transformer spill at the former Olympia Brewery in Tumwater, WA. Transformer oil drained into local waterbodies through city storm drains (Feb. 25, 2019).

Both emergency and hazardous spills involve outside responding agencies who are primarily responsible for spill or site command lead, these spills have been grouped together into one category. If city staff encounter a spill and they are unsure if the event is an Emergency or Hazardous situation, they should assume that it is and follow the Emergency or Hazardous Spill Response Plan and contact 911 and the Department of Ecology Immediately.

Coordination with Firefighting Agencies and Post-Emergency Clean-Up and Disposal

In the 2024-2029 Permit, section S5.B.3.d.11 states:

> *(a) No later than December 31, 2026, the Permittee shall coordinate with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when PFAS containing AFFFs are used during emergency firefighting activities.*
>
> *(b) No later than January 1, 2027, Permittee shall update and implement procedures to minimize discharges to the MS4 during post-emergency clean-up and disposal activities, including, but not limited to, the immediate clean-up in all situations where PFAS-containing AFFFs have been used,*

diversions, and other measures that prevent discharges to the MS4. The Permittee is not expected to deploy control measures during an emergency.

Polyfluoroalkyl substances (PFAS) are forever chemicals that can end up in surface and groundwaters and cause various health and environmental issues. A major source was in some types of firefighting foams. Since July 2020, RCW70A.400.020 prohibited the manufacturing and distribution of foams containing PFAS and the Department of Ecology has a program for taking stored foams containing PFAS from firefighting agencies.

On September 25th 2025, The Spokane Valley Fire Department sent a letter to confirm they have discontinued the use of aqueous film-forming foams (AFFF) containing per- and polyfluoroalkyl substances (PFAS) during emergency firefighting operations.

When the city becomes aware of firefighting discharges to city-owned stormwater structures, the city will investigate the IDDE case and work with the responsible party for any clean-up and disposal if necessary.

Non-Emergency or Non-Hazardous Spills

Non-emergency or non-hazardous spills are real or potential illicit discharges to stormwater systems or waters of the state that do not pose an immediate threat to human health, welfare, or the environment. The city has set a threshold of less than 30 gallons spilled to be considered non-emergency or non-hazardous. Some examples of a non-emergency or non-hazardous spills could be spills of latex paint to a storm drain, minor vehicle accidents with non-excessive amounts of vehicle fluids in the roadway, or a hydraulic line break on equipment.

Emergency Contacting

Typically, the City is notified of Emergency/Hazardous spills by other outside agencies such as the Spokane Valley Fire Department or the Department of Ecology. If the City is the first to respond to, witness, or find an Emergency/Hazardous spill, city staff should always first call 911. Emergency dispatch will then contact the Spokane Valley Fire department who assumes the initial incident response command. Depending on the type of spill, there are reporting requirements for when the City should contact the Department of Ecology. This is described in Chapter 3 in the City Reporting and Recordkeeping section.

Depending on the situation, many agencies can be involved in a spill response and clean up.

Agency	Involvement in Spill Response/ Clean Up	Contact Phone Number
Spokane Valley Fire District #8	Assumes initial incident response command	-
Department of Ecology Eastern Regional Office	Spill response clean up lead	(509) 329-3400
Spokane County Emergency Management	Primarily involved in public safety concerns	(509) 477-3046
City of Spokane Fire Regional Hazmat Team	Specialized HazMat Team for Spokane regional area	-
Emergency Management Division of Washington	Can coordinate spill response at levels above county DEM	800-258-5990

EPA National Response Center (NRC)	Federal reporting agency for waters of the United States	(301) 816-5100

City Response and Clean Up

The City has both interest and responsibility for the response and clean-up of spills on city property, city right of way, and to city owned/maintained stormwater systems. If a spill is on private property or within another's jurisdiction (such as WSDOT) and has no potential to impact city responsible areas, then the city is not the authoritative agency to respond and clean up the spill. In the case a spill is on private property, the city will contact the Department of Ecology to be the lead agency for spill response clean up.

MS4 Permit section S5.B.3.d.v.a requires the city to respond immediately to illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment. The city will be directed by commanding agencies, like the fire department and/or Department of Ecology, on city involvement in clean up. If a spill occurs within the right of way, the City can clean up the spill only if the spill is non-hazardous. If the city has the resources within its Streets Maintenance division, the city can perform clean up. If it does not have the resources, it can use its on-call contractor, Able Clean-up Technologies, to perform the clean-up.

If the spill is due to a private party accident, the city can seek reimbursement for clean-up of the spill. City staff should consult the city attorney office in these situations.

Spill Clean-up Kits

Spill kits should include but not be limited to the following:

- Safety gloves/clothes
- Absorbent pellets/chips
- Absorbent booms
- Absorbent pads
- Containment booms
- Shovel
- Polyethylene disposal bags or containers with lids

Spill Clean-up for Non-Emergencies

The city will follow these steps to promptly contain and clean up **non-emergency** (non-hazardous) spills upon discovery.

Do not wash down spills with a hose. Do not use emulsifiers or dispersants such as liquid detergents or degreasers.

1. Use necessary personal protective equipment (PPE) depending on the risk of exposure to pollutants. PPE can include:
    a. Gloves
    b. Eye protection
    c. Protective clothing
    d. Protective boots

e. No-contact tools
f. Hand sanitizer

2. Contain and isolate the spilled materials (e.g. booms, absorbents, soil, etc.)
3. Block any downstream storm drains and catch basins with "witch's hat," booms, or similar.
4. Recover spilled materials:
    - Collect spilled materials contained on impervious surfaces with absorbent pellets, absorbent pads, kitty litter, etc.
    - Collect non-hazardous oily liquid material that may have entered sumps or catchments with absorbent pads.
    - No recovery is necessary for non-hazardous spills to ground < 30 gallons.
5. Place used and contaminated clean-up materials in a closable container or plastic bag.
6. If necessary, conduct analyte testing to identify contaminants. Eurofins (509-924-9200) is a permitted service provider.
7. Label the container/bag as "cleanup materials contaminated with <insert spill material name>"
8. Dispose of clean-up waste containers appropriately.
    - Non-hazardous solid waste – containers may be disposed in a municipal solid waste dumpster.
    - Hazardous waste – coordinate with an accredited or permitted waste management broker or facility.

PICTURED: OIL BOOM PLACED TO PROTECT SWALE FROM OIL SPILL.

Spill Clean-up for Emergencies

The city will take the following steps when cleaning up after emergency spills.

1. Immediately call **911**.
2. Identify conditions of spill.
3. Await emergency response teams and provide known details of the spill.
4. Await and coordinate with emergency response teams, Spokane Regional Health District, and the Department of Ecology for clean-up details.
5. If coordinated for clean-up:
    - If non-hazardous material and resources are available, follow BMPs described herein.
    - If material is non-hazardous and resources are <u>not</u> available, coordinated with spill response service provider.
    - If the material is hazardous material, coordinated with spill response service provider.

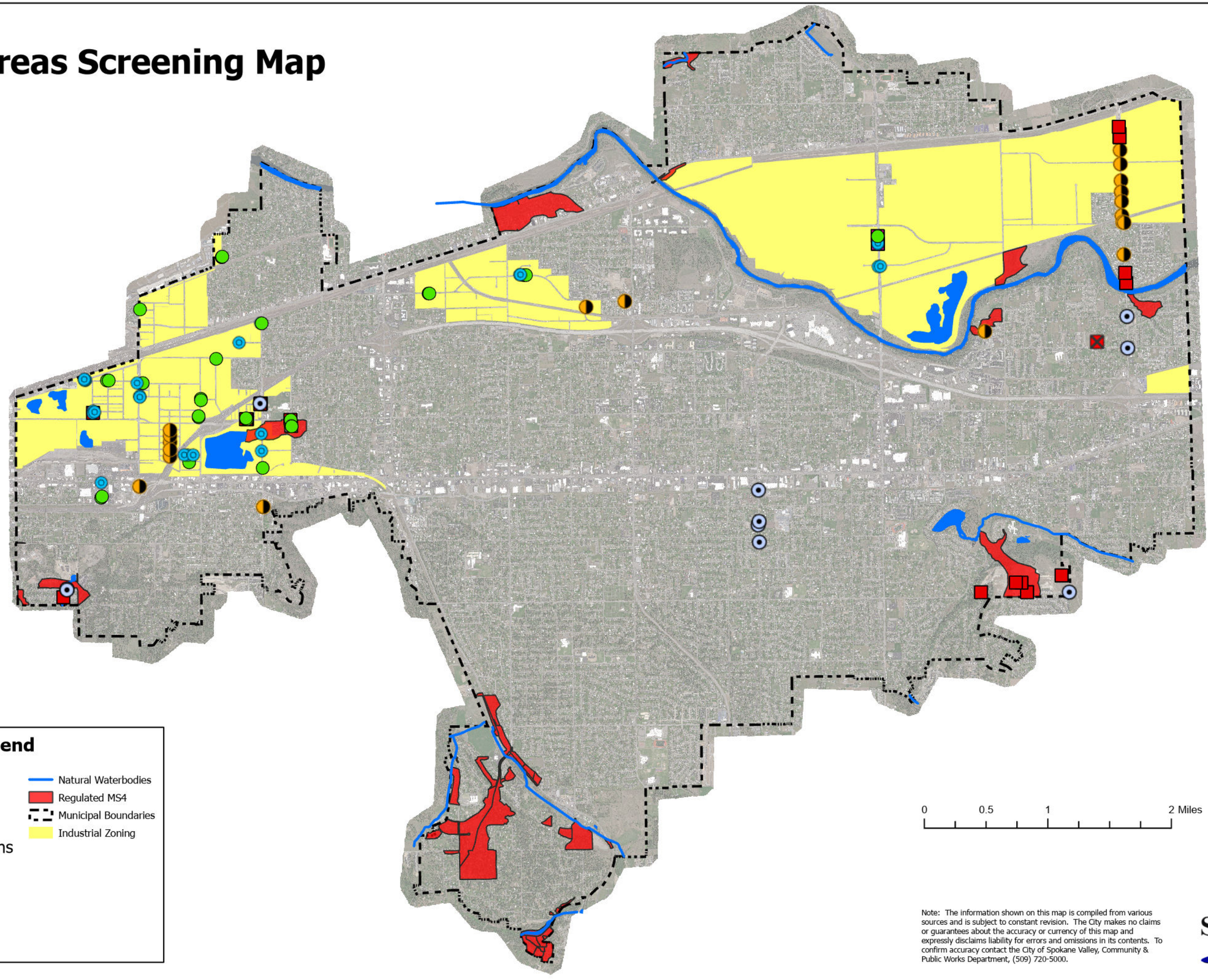
Appendices List

Appendix A - Priority Areas Screening Map

Appendix B – IDDE Screening, Tracing, and Response Plan

Appendix C – Stormwater Spill Response Plan

Priority Areas Screening Map



Legend

High Risk Drywells

- Single
- Double

High Risk Catch Basins

- CB-Type1
- CB-Type2Round
- CB-Type2Square
- CB-Channelized

- Natural Waterbodies
- Regulated MS4
- Municipal Boundaries
- Industrial Zoning

0 0.5 1 2 Miles

N

Note: The information shown on this map is compiled from various sources and is subject to constant revision. The City makes no claims or guarantees about the accuracy or currency of this map and expressly disclaims liability for errors and omissions in its contents. To confirm accuracy contact the City of Spokane Valley, Community & Public Works Department, (509) 720-5000.

City of Spokane Valley

APPENDIX B

IDDE SCREENING, TRACING, AND RESPONSE PLAN

See the IDDE Response Plan for use the IDDE Screening , Tracing, and Response Procedures vs the Stormwater Spill Response Procedures.

Outside Notification of Illicit Discharge or Connection is Received

Stormwater Staff or Administrative Staff enter new Request in QAlert

Required Response Times to Initiate Investigate

Immediately - ID/ICs and spills which are a threat to human health, welfare, or the environment (G3). Follow the Spill Response plan for all Spill Events.

7 Days – Complaints, reports, or information indicating potential illicit discharge

21 Days – Report or discovery of a suspected illicit connection

Conduct Field Screening Methodologies

-Residential Storm Drain Inspections
-Outfall Inspections
-Video Inspections
-High Priority Screening Inspections
-Routine Arterial Storm Drain Maintenance
-Other Field Screening Methodologies

Legend

City of Spokane Valley Action

Outside Agency

Decision/Action Path

Potential or Actual Illicit Discharge Found

Completely in the right of way, drainage/border easement, or source coming from private property?

No

Completely on Private Property? (No discharge to public drainage system/ right of way)

Yes

Contact Department of Ecology
509-329-3400

and

Spokane Regional Health District
Business Inspectors for Commercial Properties
509-324-1475

No

Yes

Flow present?

No

Indicators suggest potential ID/IC?

No

No ID/IC

Close QAlert

Yes

Indicators suggest potential ID/IC?

Yes

Contaminant type and source known?

No

Yes

Collect sample and send to lab for analytical tests. Do results indicate a potential ID/IC?

Yes

No

Non-stormwater liquids/solids present?

Yes

No

Pollutant Source Assumed or Unknown

Yes

Conduct Source Tracing Methodologies

-Storm Basin Inspections
-Dye Testing
-Business Inspection
-Video Inspections
-Other Source Tracing Methodologies

Source and Polluter Known?

Yes

No

Steps to take if the source/polluter is identified:

a. Schedule time to talk to the violator and educate them on how to implement best management practices to reduce stormwater pollution and remove/repair the illicit discharge.
b. Give the violator all pertaining brochures, handouts, and City Code sections.
c. Set a reasonable time for the violator to clean up and correct the illicit discharge.
d. Informational "Only Rain in the Drain" door hangers are left on buildings in the area.
e. Staff will notify appropriate agencies.

Steps to take if the source/polluter cannot be identified:

a. Informational "Only Rain in the Drain" door hangers are left on buildings in the area.

b. City staff will manage the clean-up, remove or repair the illicit discharge.

Staff will conduct more site visits to determine if progress is made to stop and/or clean up stormwater pollution

Has progress and deadline been met? Illicit connection – 6 months after initial investigation.

No

Send a certified letter to the violator informing code enforcement will be contacting them. **SVMC 22.150.110**

Code enforcement will use progressive enforcement actions to get violator to resolve ID/IC.

Stormwater Staff will provide technical assistance to Code Enforcement to help resolve the illicit discharge/connection.

Violator compliant with city code within deadlines?

Yes

No

City abates and seeks reimbursement of costs per **SVMC 17.100**

Yes

Illicit Discharge/Connection Cleaned up and/or fixed

a. Close QAlert
b. Submit WQwebIDDE

APPENDIX C - STORMWATER SPILL RESPONSE PLAN

See the IDDE Response Plan for when to follow Spill Response Procedures vs the IDDE Screening , Tracing, and Response Plan

Spill Event

Was the Spill Hazardous or an Emergency?

Yes

EMERGENCY OR HAZARDOUS SPILL

Every spill event is unique, and the responding agencies varies. In general**, the city should always contact 911 to report and the Department of Ecology** for direction. The below flow path attempts to cover likely procedures for clean-up and communication.
For oil or hazardous material spills to the MS4, contact Ecology and the Emergency Management Division of Washington. **See NPDES Permit G3.**

Property where spill occurred

Public Property or Right of Way

If spill occurred on Private Property or Ground or Surface Waters only

City Not Responsible. Contact Regional Department of Ecology
509-329-3400

For commercial properties contact Spokane Regional Health District
509-324-1475

Document in QAlert

No

NON-EMERGENCY OR NON-HAZARDOUS SPILL
Including oil & gasoline less than 30 gallons

For non-emergency illicit discharges or connections that are not spills, see the IDDE Screening, Tracing, and Response Plan

City Performs IDDE Investigation

See IDDE Program Plan for Procedures

Property where spill occurred

If spill occurred on Private Property or Ground or Surface Waters only

Public Property or Right of Way

City of Spokane Valley

-Public Works Director
509-720-5320

-Street Superintendent
(509) 954-0850

-Stormwater Utility
(509) 797-4100

Regional Department of Ecology

509- 329-3400

Spill Response Clean Up Lead

Ecology will let the city know their responsibility or involvement in the clean up of an emergency or hazardous spill

City Resources to Clean Up?

Yes

No

Consider Reimbursement of Spill Response

Clean Up Performed by City

City Contractor Clean Up

Private Party Performs Clean Up

Clean Up Performed by Other

Clean Up Performed by City (Non-Hazardous)

Other Agency Clean Up

SPILL CLEANED UP

Yes

No

Yes

No

Yes

No

Communication between the city, Ecology, Other Involved Agencies, and Responsible Private Party can vary

Responsible Private Party

Insured for Clean Up?

Yes

No

Regional Department of Ecology

509-329-3400

Spill to MS4: Contact within 24 hours

Oil Spills to Ground: Contact within 90 days

City of Spokane Valley

-Public Works Director
509-720-5320

-Street Superintendent
509-954-0850

-Stormwater Utility
509-797-4100

Spill Response Clean Up Lead

City Responsible for Clean Up

Yes

City Resources to Clean Up?

No

Responsible Private Party

Insured for Clean Up?

Document Investigative Follow Up And Record all Spills in QAlert.

Other Involved Agencies

Law Enforcement

Investigate Criminal Enforcement
911

Emergency Management Division of Washington

800-258-5990

Can Coordinate Spill Response

EPA National Response Center (NRC)

509-536-5960

Federal Reporting Agency for Waters of the United States

Spokane Valley Fire District #8
911

Assumes Initial Incident Response Command

City of Spokane Fire Regional Hazmat Team

Specialized Hazmat Team

Spokane County Emergency Management

509-477-3046

Primarily Involved with Public Safety Concerns

Legend

City of Spokane Valley Path

Department of Ecology

Decision/Action Path

Communication Path