Western Washington IDDE Incident Tracking Form

Purpose

The Illicit Discharge Detection and Elimination (IDDE) Incident Tracking Form at
http://www.ecy.wa.gov/programs/wq/stormwater/municipal/rsmp/IDDE.html is intended to:

- Gather incident-specific information about permit compliance for illicit discharges, and
- Help permittees understand how to respond to the annual report question that asks permittees to provide incident-specific information about illicit discharges, and
- Provide optional information to help identify regional patterns in illicit discharges and successful methods for detecting and addressing illicit discharges, and
- Establish a framework for consistent, minimum reporting that supports data entry and analysis.

Background

Most of the information collected via this IDDE Incident Tracking Form will be included as part of the Source Identification Information Repository (SIDIR, permit condition S8.D) Results and Findings. SIDIR Results and Findings will be used to identify the most common types and sources of illicit discharges responded to by permittees and to help identify trends and patterns. The information generated by SIDIR analyses will be used to prioritize problems that can be addressed with additional resources, more training or regulatory oversight, or other solutions.

Phase I permittees and Phase II Municipal stormwater permittees in Western Washington are required to provide incident-specific information about illicit discharges in their annual reports (see Phase II annual report question 20; Phase I questions 36 and 48; and Phase I Ports question 13). The first required report covered the 2014 calendar year and was due March 31, 2015. Permittees can use this IDDE Incident Tracking Form to prepare responses to those annual report questions and thereby demonstrate compliance with specific IDDE requirements.

Use of the form

Use of this IDDE Incident Tracking Form to support the permit-required IDDE compliance reporting and/or to provide information to inform SIDIR is voluntary. Permittees who choose to use the form are not required to provide information for every field. The SIDIR analysis will focus on Fields 3, 4 and 9 through 14. Those conducting the SIDIR analysis will also review the information entered in Fields 16 and 17.

Although some fields are designated as **(required)** or **(optional)** information for the purposes of annual reporting, only two fields are necessary to fill out in order to successfully submit an online form entry to the SIDIR database. See the "Instructions" and "Explanation of Fields" sections below.

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Compliance Tracking and Reporting

The explanation of fields for the online form will help you understand how to respond to the annual report question by identifying which information is required to be submitted.

Fields designated below as **(required)** have been determined by Ecology's permit managers as information necessary for a complete incident-specific response to the annual reporting requirement. The **(required)** fields do not all need to be completed in order to submit information to the SIDIR database via the online form. Fields designated below as **(optional)** have been included to provide information for permit managers and/or to support the regional SIDIR analysis. Submittal of this form via the SIDIR database does not fulfill annual reporting requirements.

While this form might be all that is needed to document and report to Ecology your IDDE investigation, response, and resolution for a simple problem, it is unlikely to meet all of your needs for documenting more complicated situations, particularly if enforcement is necessary.

Instructions

1. Fill out the IDDE Incident Tracking form for all appropriate incidents. For submittal to the SIDIR database, Fields 1 and 2 must be filled out.
2. Submitted data may be viewed at https://data.wa.gov/Natural-Resources-Environment/RSMP-Illicit-Discharge-Detection-and-Elimination-I/ikwr-f47z.
3. Fill out Field 2a to indicate whether this is a new entry or a change to a previous entry. If this is a change, whether you are adding new information or changing a previous entry in a field:
    i. Check that the information in Fields 1 and 2 is unchanged, and
    ii. Proceed to enter information only for the field(s) you are updating.
   The new field entries will be merged with the prior information, replacing the previous fields as indicated. We suggest you keep records of all updates together with your previous entries.
4. For new entries, proceed to fill out all remaining fields you wish to include.

Explanation of Fields

Field 1: Jurisdiction name (required). *Necessary to submit an online form entry
Use the same variation in the spelling, capitalization, or abbreviation of your jurisdiction (permittee) name for each incident you report. If you provide an email address in the online form, the information you entered in the online form will be emailed to you for your records.

Field 2: Unique identifier (required). *Necessary to submit an online form entry
Provide a number unique to this incident within your jurisdiction for the reporting year. You may use a simple number series, a work order number, an ERTS number provided by Ecology, or any unique number generated by the permittee. Numbering may be continual or restarted each calendar (reporting) year.

Field 3: Date incident was initially reported (required). * SIDIR analysis focus

This information will be used to analyze seasonal variation in types and location of problems.

Field 4: Location (optional). * SIDIR analysis focus

Please provide the street address or, if you prefer not to provide the entire address or nearest intersection, please consider providing the zip code. This information will be helpful for mapping incidents to identify geographic clusters of various problems.

Field 5: Weather condition at time of report (optional).

This information will be used to analyze variation in conditions under which various types and locations of problems occur or are discovered. You may use approximate numbers or estimates for both the temperature and the amount of rainfall in the previous 24 hours.

Field 6: Frequency (required).

Choose one of the options. If you choose "other," provide an explanation in Field 16. Field 6 will inform understanding of what types of problems jurisdictions are most commonly responding to over time, i.e., are fewer of the incidents ongoing and a greater proportion spills? Your permit manager will review this field with Field 7: Threat determination and G3 notification.

Field 7: Threat determination and G3 notification (required).

Answering the question, constituted a threat to human health or the environment?, is required by permit condition Phase I S5.C.8.d.iv and Phase II S5.C.3.d.iv. Provide documentation of any delay in Field 16. If G3 notification is required, check that it was done or provide an explanation in Field 16.

Field 8: Incident response timeline (required).

This information is for permit compliance. Your permit manager will review your responses to assess your performance of the permit-required tasks and timelines. If investigation or resolution was delayed, the reason for the delay must be documented. Provide documentation of any delay in Field 16. If referred, include in Field 16 the name of the entity to which you referred the incident.

Field 9: How did you learn about the problem? (optional). * SIDIR analysis focus

Check all that apply. Information about how you learned about the problem will be valuable for understanding what methods are most used and useful.

Field 10: Source tracing method(s) (required). * SIDIR analysis focus

Check all that apply. This list of source tracing methods is taken from the IDDE field screening manual at http://www.wastormwatercenter.org/file_viewer.php?id=945. If you use other methods explain your approach in Field 16.

Field 11: Indicator testing (optional). * SIDIR analysis focus

Check all that apply. Sharing what indicators you used to identify the problem will be valuable for understanding what indicators are most used and useful. If you wish to include field results or specific indicator values in Field 16 you may, but they will not be included in the SIDIR analysis. If

you use other indicators, explain in Field 16. This list of indicators is taken from the IDDE field screening manual at http://www.wastormwatercenter.org/file_viewer.php?id=945.

Field 12: Pollutant(s) identified (required). * SIDIR analysis focus
Check all that apply. If the problem cannot be described using the list provided, explain in Field 16.

Field 13: Source or cause (required). * SIDIR analysis focus
Check all that apply. If the source cannot be described using the list provided, explain in Field 16. For commercial and industrial sources, provide additional, more detailed information about the activity in Field 16. More specific information will support better analysis of the information to prioritize activities for adaptive management. If more specific information is not provided in Field 16, the SIDIR analysis may follow up with a request for additional information.

Field 14: Correction and elimination method(s) (required). * SIDIR analysis focus
Check all that apply. If your approach cannot be described using the list provided, explain in Field 16. Information about the methods used to eliminate the source or otherwise resolve the problem will be valuable to help understand what methods are most used and useful.

Field 15: Resolution date (required).
The time elapsed between the report and resolution dates and will be used to analyze variation in the length of time required to address various types of problems. If your response to the incident is still in process, check 15a.

Field 16: Field notes, explanations, and other comments (required). * SIDIR analysis focus
Provide documentation of any delay in response or resolution in this field. Explain any required response labeled "other" in this field. If you have no notes to add, do not leave the field blank; write 'N/A' or 'None'. Statements included in this field do not constitute a notice of non-compliance to Ecology. Please refer to Permit Condition G20 for Non-Compliance Notification timelines and information needs.

Field 17: Other helpful or relevant information (optional). * SIDIR analysis focus
This field may also be used to include any other helpful or relevant information about the response, investigation, and resolution process. If you can estimate the amount of pollutant in pounds or discharge in gallons that was eliminated as a result of your IDDE actions, please include it here.

Questions about this form should be directed to your permit manager.