

**Parker, Ted (Leo)**

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**From:** McCrea, Rachel (ECY) <rmcc461@ECY.WA.GOV>  
**Sent:** Tuesday, February 12, 2013 1:29 PM  
**To:** Parker, Ted (Leo); Leif, William  
**Cc:** Parker, James  
**Subject:** RE: Alternative Catch Basin Inspection Schedule - questions

Hi Ted –

Thank you for your prompt response. With these clarifications, the County appears to have justified an alternative inspection frequency for right-of-way catch basins in accordance with the requirements in Special Condition S5.C.9.b.iv(2). I will place a copy of this email in the County's permit file together with the Jan 29, 2013 letter. And as a reminder, be sure to retain your maintenance records upon which this justification is based.

Rachel McCrea | Lead Water Quality Planner for the Lower Duwamish | Municipal Stormwater Specialist  
Department of Ecology NWRO | Water Quality Program | 425-649-7223

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**From:** Parker, Ted (Leo) [mailto:[t.parker@snoco.org](mailto:t.parker@snoco.org)]  
**Sent:** Tuesday, February 12, 2013 10:58 AM  
**To:** McCrea, Rachel (ECY); Leif, William  
**Cc:** Parker, Ted (Leo); Parker, James  
**Subject:** RE: Alternative Catch Basin Inspection Schedule - questions

Rachel:

Sorry for the delay. Thank you for the email request for clarifications.

Our response to your questions and inquiries are in red text.

Thank you for the opportunity to respond.

1. The letter indicates there was a 4 year period where annual inspections occurred, however it refers only to a 3 year period from Jan 2009 to Jan 2012.

Indeed this is not correct, we started collecting CB inspection data January 2009 and have continued to collect data each year through January 2013, (not 2012 as referenced in the letter) and will continue to collect inspection and maintenance data for 2013. Sorry for the confusion, the point is that we do have 4 years of data of CB inspections.

2. The letter states that the County has inspected its "full circuit" of catch basins within the right of way. Please clarify if that means that the County has inspected each CB or if the county has inspected only indicator CBs within a circuit (as allowed under the circuit basis inspection approach).

Yes, the terms we are using in the notification letter can be confusing.

In 2007 the County RM division chose the alternative approach (S5.C.9.iv.1) to cb inspections  
As follows

As an alternative to inspecting catch basins on a "circuit basis," the Permittee may inspect all catch basins, and clean only catch basins where cleaning is needed to comply with maintenance standards.

**"full circuit" is an internal term.**

**Yes, to clarify the county does inspect each known CB within its right-of-way.**

3. Clarify if the County is limiting this reduced inspection frequency to the ROW catch basins only, because it is these CBs that your inspection experience is based upon.

**Yes, this notification for reduced inspection frequency is limited to CB's within the right-of-way.**

**If you have further questions or concerns concerning the 4 years of data please contact our Management Systems Lead, James Parker at 425-388-7541, email is attached.**

Thanks, look forward to working with you.

Ted

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**From:** McCrea, Rachel (ECY) [<mailto:rmcc461@ECY.WA.GOV>]  
**Sent:** Friday, February 08, 2013 8:32 AM  
**To:** Lelf, William; Parker, Ted (Leo)  
**Subject:** Alternative Catch Basin Inspection Schedule - questions

Hello Ted and Bill –

I have received Snohomish County's statement dated January 29, 2013 that is intended to document the County's justification for an alternative catch basin inspection schedule under the Phase I Municipal Stormwater Permit special condition S5C9.b.iv(2). I have a few questions, below, where the letter is not entirely clear or, possibly, accurate.

4. The letter indicates there was a 4 year period where annual inspections occurred, however it refers only to a 3 year period from Jan 2009 to Jan 2012.
5. The letter states that the County has inspected its "full circuit" of catch basins within the right of way. Please clarify if that means that the County has inspected each CB or if the county has inspected only indicator CBs within a circuit (as allowed under the circuit basis inspection approach).
6. Clarify if the County is limiting this reduced inspection frequency to the ROW catch basins only, because it is these CBs that your inspection experience is based upon.

Give me a call if you want to discuss. I look forward to hearing from you.

Rachel

Rachel McCrea | Lead Water Quality Planner for the Lower Duwamish | Municipal Stormwater Specialist  
Department of Ecology NWRO | Water Quality Program | 425-649-7223



**Snohomish County**  
Executive's Office

Aaron Reardon  
County Executive  
January 29, 2013

(425) 388-3460  
FAX (425) 388-3434

M/S #407  
3000 Rockefeller Avenue  
Everett, WA 98201-4046

Rachel McCrea  
Municipal Stormwater Specialist  
Washington State Department of Ecology  
Northwest Regional Office  
3190 – 160th Avenue S.E.  
Bellevue, WA 98008-5452

**Subject: Phase 1 NPDES Municipal Stormwater Permit #WAR04-4502  
Alternative Catch Basin Inspection Schedule**

Dear Ms. McCrea:

This letter provides notification to Ecology that Snohomish County will change the inspection frequency of catch basins in accordance with Special Condition S5.C.9.b.iv.(2) of the NPDES Phase 1 municipal stormwater permit. That condition states:

**"The annual catch basin inspection schedule may be changed as appropriate to meet the maintenance standards 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 experience and shall be certified in accordance with G19 *Certification and Signature*."**

From January 2009 through January 2012 the Snohomish County Road Maintenance Division has inspected its full circuit of catch basins within the right of way for required maintenance, water quality, and sediment control. During that time the division averaged above 98% completion, with the remaining 2% marked as unable to inspect or locate. Basins unable to be located were marked for further investigation. Over the four year period, the division cleaned over 12,000 basins. In that same period, only 2 of those basins required more than a single cleaning. That is not to say that basins were not cleaned more than once, but that the basins did not reach a sedimentation level (> 60 % of sump depth) that required cleaning more than one time. The Road Maintenance Division feels that a two year inspection cycle, distributed as 50% inspection per year, is appropriate as allowed by the Phase 1 municipal stormwater

Rachel McCrea  
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permit (pursuant to S5.C9.C.i.). Inspection, cleaning, and maintenance and data have been recorded and are available for review.

If you wish to discuss this matter further, please contact Ted Parker, Snohomish County Department of Public Works, Road Maintenance Division, at (425) 388-7524.

I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.

Sincerely,



Aaron G. Reardon  
Snohomish County Executive

cc: Steven E. Thomsen, P.E. Director, Department of Public Works (DPW)  
Steve Flude Director, DPW/Road Maintenance  
Bill Leif, P.E. DPW/Surface Water Management

**Snohomish County  
CY 2017 Annual Report  
Attachment for Question 62e  
Alternative approach for catch basin inspection**

Snohomish County Surface Water Management Division (SWM) applies an alternative approach to a portion of their custodial catch basins, ones that are designed to provide conveyance function only. Those conveyance-only catch basins are inspected on a two-year cycle, with inspections occurring in odd years. This schedule is based on SWM's past years of maintenance records, in accordance with NPDES Permit Special Condition S5.C.9.d.i. Catch basins under the custodial control of SWM that are designed to function as a part of a stormwater facility are excluded from this alternative approach, receiving the standard approach of annual inspections and maintenance according to the adopted standards, per Special Condition S5.C.9.c.i. The County also implements, for the custodial properties of the Road Maintenance Division of the Public Works Department, an alternative catch basin inspection approach as described in the attached January 29, 2013, letter and follow-up email communications.