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DEPARTMENT OF ECOLOGY

December 21, 2018

Colleen Crotty  
Municipal Stormwater Specialist  
Water Quality Program  
Department of Ecology  
Northwest Regional Office  
3190 160th Ave SE  
Bellevue, WA 98008-5452

Re: NPDES Phase I Municipal Stormwater Permit, S4.F Notification – Turbidity discharge from municipal separate storm sewer (MS4) to Lake Washington Ship Canal.

Dear Ms. Crotty,

The purpose of this letter is to notify Ecology under S4.F of the Permit that a one-time discharge from the City of Seattle's (City) municipal separate storm sewer system (MS4) has caused or contributed to a known or likely violation of water quality standards in the receiving water.

Notification Subject

On 11/11/2018, SPU Environmental Compliance Inspectors responded to ERTS # 685249, which was reported by Seattle Fire Department for a 4-Alarm fire in the Queen Anne Neighborhood near 3<sup>rd</sup> Avenue W and W Ewing Street in Seattle. SPU responded to the incident to support Seattle Fire Department and to respond to impacts from the incident. The incident occurred in an area that discharges to the combined sewer, and it was believed that there were no discharges from the MS4. On 11/27/2018, SPU Regulatory Compliance became aware that fire-fighting water had discharged to the Lake Washington Ship Canal from sheet flow on the unimproved street end of 6<sup>th</sup> Avenue W. and a small adjacent ditch. At least 6000 gallons of water per minute for several hours were used to fight the fire. Much of this fire-fighting soot- and ash-laden water presumably discharged to the Ship Canal via 6<sup>th</sup> Avenue W. during the period of active firefighting.

Nature and Extent of Known or Likely Violation

This notification is for a known or likely violation of the Aquatic Life Turbidity Criteria (WAC 173-201A-200(1)(e)) in fresh water and is based on a documented visual observation of turbid water flowing into and in the Ship Canal. There is no receiving water data available. The Ship Canal has a turbidity standard of 5 NTU over background when the background is 50 NTU or less (WAC 173-201A-200(1)(e)).

The City of Seattle's Actions

On 11/11/2018 SPU staff arrived the site of the active fire. SPU staff coordinated with Ecology, the Coast Guard, and the owner-contracted clean-up contractor. Booms were placed at the point of discharge of 6th Avenue W, and in and at the outfall of the ditch adjacent to 6th Avenue W. Straw waddles were placed at the site to reduce the amount of ash- and soot- laden firefighting water leaving the site. Clean-up continued through 11/18/2018 and included sweeping of the Right-of-Way and final removal of the booms.

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The City continues to apply and implement its programs for stormwater management and to seek improvement to those programs through increased understanding of stormwater impacts and mitigation tools. The City looks forward to working with Ecology toward the mutual goal of reducing the water quality impacts of municipal stormwater discharges.

It is anticipated that Ecology will not require an Adaptive Management response, as this notification is based on a one-time event that was addressed by Seattle's SWMP through the City's spill response program.

The City relies on the understanding that unless otherwise notified by Ecology, this letter will serve as the single notification to Ecology for the situations identified, for any ongoing or continuing violations. Seattle is making notification in good faith under an evolving understanding of S4 gained through permit appeal and modification, which is a learning process in communication with Ecology. Additionally, it is the City's understanding that a notification under G20 is not required. If Ecology has any different understanding, please contact the City as soon as possible.

Please feel free to contact Kate Rhoads, of my staff if you have any questions regarding this letter. Kate is the lead for the Municipal Stormwater Permit for the City of Seattle and can be reached at (206) 684-8298 or at [kate.rhoads@seattle.gov](mailto:kate.rhoads@seattle.gov).

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 violation.

Cordially,



John Holmes, Interim Deputy Director  
Drainage and Wastewater Line of Business  
Seattle Public Utilities

cc: Ben Marre, SPU  
Kevin Burrell, SPU  
Kate Rhoads, SPU  
Theresa Wagner, Seattle Law Department