From: Glodek, Teresa E
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Posted At: Industrial Stormwater Comments
Conversation: Industrial Stormwater Comments
Subject: Industrial Stormwater Comments

I strongly believe there should be wording in the permit to allow a facility to change status to a lower action level after reaching consistent attainment. Allowing the lowering of Action Level Status after consistent attainment of benchmark values provides incentive for facilities to continuously improve stormwater quality and rewards those in compliance. This also avoids the possibility that a third party to incorrectly associate Action Level Status' with noncompliance, potentially encouraging law suits or having negative affects on a facility's reputation. The intent of the permit is to control stormwater quality, not to negatively label those that take correct actions to attain compliance.

The permit should specify a number of consecutive quarters that attainment of benchmark values needs to be met in order for the Action Level Status of the facility can be lowered. Possible wording could be as follows:

"The Permittee's Action Level Status will be lowered only after X quarters with consistent attainment of benchmark values. The Permittee must submit a petition to lower their current Action Level Status, with all supporting evidence."

I strongly encourage you to incorporate this comment into the editing process of the permit.

Thanks,

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