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Date:	Wednesday, July 15, 2009 2:31:38 PM
Posted At:	Industrial Stormwater Comments
Conversation:	Conditional No Exposure Certification process for Cottage Industries in Washington
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Based on a review of business listings for the state of Washington, it is apparent that many existing 'cottage industries' in Washington require coverage under the Industrial Stormwater General Permit (ISGP) based on their Standard Industrial Classification (SIC) code. Many of these industries fall under 'catchall' SIC codes which include the phrase "not elsewhere classified." Examples of these catchall SICs which require ISGP coverage include 2079, 2087, 2099, 2252, 2259, 2269, 2299, 2329, 2339, 2369, 2389, 2399, 2429, 2449, 2499, 2519, 2599, 2679, 2732, 2741, 2759, 2789, and over 50 additional.

As an example, there are currently over 400 existing facilities in Washington State with less than 5 employees and less than $100,000 in annual sales classified under SIC 3999 alone (Manufacturing Industries, Not Elsewhere Classified). Specific to these 400, facilities under 3999 may 'manufacture' small quantities of relatively benign products such as candles, embroidery kits, lamp shade frames, puppets and wind chimes (etc.) and pose little potential as a stormwater contaminant source.

Due to the size and scope of many of these operations, it is estimated that a large proportion of facilities falling under these SICs would qualify for Conditional No Exposure Certification and/or represent little impact to water quality due to indoor operations. The draft permit suggests that these facilities must apply for permit coverage, and pay the permit application fee before applying for Conditional No Exposure Certification.

We recommend that Ecology incorporate criteria into the ISGP which would define or identify cottage industries (by a combination of SIC, annual sales, employment, facility size, etc.) and allow them to apply for Conditional No Exposure without first applying for the permit.

Such a contingency could easily be incorporated into the draft by adding verbiage to S1.F, as well as a definition of cottage industry to Appendix 2.

By doing so, existing unpermitted cottage industries who may have previously avoided the ISGP due to financial, staff, expertise and/or time constraints will have an incentive to come into compliance with the ISGP and Clean Water Act while minimizing their time and capitol expenditures.

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