

**Industrial Stormwater General Permit Initiative
November 13, 2008**

Association of Washington Business

Enforcement

Permit language is scrubbed to reduce opportunities for technical violations; e.g. SWPPP. Intentionally remove complexity from ISWGP.

Bright-line requirements allow for confident compliance assessments.

SWPPP developed by Permittee; reviewed and approved by Ecology. Full implementation of the SWPPP (BMP's defined; BMPs maintained; documentation of maintenance actions; visual inspections; sampling/record-keeping/reporting; etc.) defines compliance with the ISWGP.

Non-compliance with the SWPPP should result in mandatory penalty/order.

Consider amending General Condition G17 certification to address completeness of SWPPP implementation.

All applicable and appropriate BMPs = AKART

Retain Dispute Resolution section in ISWGP (Special Condition S13)

Incentives

Provide reasonable off-ramps to permit requirements

- consistent attainment of benchmarks reduces on-going sampling need
- in situ demonstration of water quality standards attainment obviates need for corrective action process

Ecology specifies presumptive BMPs in ISWGP. Ecology engages in defining BMPs/AKART by industry type.

Safe harbor concept if Permittee requests technical assistance from Ecology on SWPPP development and implementation. If good faith effort to comply with permit, then no Ecology enforcement action. Borrow from successful L&I program.

Decisions on corrective actions; i.e., BMP upgrades, based on seasonal, median sampling results. DMRs submitted annually.