

**ISWGP WORK PROGRAM**

At the Work Group meeting on 9/8, the Work Group identified the key issues for discussion in the work group process. These issues were then grouped into major topic categories, and organized for discussion and the upcoming Work Group meetings.

**09/29/08 MEETING: Standards & Performance Measures**

- Science behind benchmarks and monitoring
  - \* Data from last two years and trends
  - \* Update of 6415 data evaluation
  - \* Analysis of monitoring results
- Is the current benchmark approach working?
  - \* Get input from inspectors
  - \* Determine what is happening on the ground?
  - \* What has worked or not and why
  - \* Are BMPs actually working?
- How should Ecology determine benchmark values?
- Which parameters should have benchmarks
- Compliance with 6415
  - \* Presumption of WQ standard compliance.
  - \* Are appropriate BMPs = AKART
- Benchmarks versus numeric effluent limits for existing discharges to 303(d) listed water bodies

**10/17/08 MEETING: Enforcement, Compliance, and Adaptive Management**

- Monitoring Requirements
  - \* Timing
  - \* Type
  - \* Frequency
- Adaptive management feedback loop and response timing
  - \* The process should be clear, and response should be quick
- Timing of sampling, data evaluation, and corrective action triggers
- ERP model regarding adaptive management
- Reporting requirements and timing
- Confident compliance with permit

- Incentives so compliance is a competitive advantage with environmental results
  - \* Provide a voluntary track for businesses?
- Should Ecology interface with PSP?
- Enforcement and presence (relates to fees and Ecology staff)
- A problem is that Ecology's process is the same for all violations
  - \* Is it preferable to reduce the amount of process and number of transactions?
  - \* Can Ecology automate non-compliance responses for clear violations, like the non-submittal of a DMR?
  - \* Can Ecology create a better connection between data and action?

**11/13/08 MEETING: Permit Coverage & Administrative Issues: continuity & accountability**

- Who is covered under general permit, who should be under individual permit (due to significance)
  - \* High metals – is there a subset that should be individual permits?
- What should trigger individual permit
  - \* Water body
  - \* Monitoring history and use
- Continuity between old and new general permits
- Historical sources
- Landlord and tenant issues
- Accountability for upgradient run-on
- Comingling
- CSO – exemption from ISWGP?
- Unpermitted discharges

**12/12/08 MEETING: Assistance to Permittees (Implementation Support Structure)**

- Criteria for and Quality of SWPPPs
  - \* Implementation
  - \* Updates
  - \* Certification
- SWPPP and BMP Templates
  - \* ID best ideas – photos and narrative CD or online
  - \* Model SWPPP

- \* Make easier and higher quality inclusion of mandatory practices (balance flexibility and clear prescriptive)
- \* Define solutions for typical situations (City of Seattle source control document as example?)
- \* Provide available technology and tech assistance for common solutions eg. Zinc issues regarding roof coatings... references in one place
- Disconnect between Ecology inspector messages vs. permit compliance clarification of inspector authority and messages
- Small business resources and ability to track and report – administrate the permit and comply: both Ecology and small businesses lack of resources
- Forum for business tech exchange
- Outreach and Education
  - \* Joint training – inspectors, permittees, & citizens
  - \* Build a community and train at appropriate level
  - \* Certification program inspector and permittee – could be web based
  - \* Workshops and trainings (see ECOSS notes), that are recurring to keep competency
  - \* Incentives for participation in trainings
  - \* 3rd party to do outreach and education
  - \* Partnership opportunities to bring to the table - is there foundation money?
  - \* 3rd party certification (like salmon safe or EnviroStar)
  - \* Certification as an incentive
  - \* ERP self – certification idea
  - \* Lessons learned workshops (eg POB per Soundkeeper settlement)
  - \* Port or WPPA sponsorship?
  - \* Incentive for attending workshops and training
  - \* Periodic receiving water body sampling and feedback to permittees in general area
- Technical Assistance
  - \* Ecology (or creditable 3rd party) should provide clear and specific requirements for BMPs and procedures
  - \* Technical assistance without enforcement – 2 “free” visits or some immunity
  - \* Technical assistance without enforceable documentation
  - \* More intense Ecology site visits
  - \* Require initial technical assistance? How to get everyone to get some level of technical assistance-required with SWPPP?
  - \* Potential model from Ecology dangerous waste program
  - \* Assistance to evaluate specifics regarding when to monitor

- \* Grants, loans, tax incentives - \$ to help small businesses meet fundamental requirements
- \* Central resource list of private sector vendors and consultants who assist businesses with BMPs
- \* Co-ops or resource sharing, for example sweepers
- \* To get on Ecology recognized list...they need demonstrated capability
- \* Email community regarding reminders, etc. to SIC code or whole – technology updates, etc.
- \* Industrial forum regarding resources, vendor recommendation
- \* Pay for technical assistance
- Co-op regional treatment facilities

Note: The remaining meeting will be focused on clarifying and summarizing Work Group recommendations for input to Ecology.

**01/15/09 MEETING: Compilation of Recommendations**

**01/22/09 MEETING: Compilation of Recommendations**