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**WPPA Suggestions for benchmarks, BMPs, and adaptive management in preparation for the 10/17/2008 meeting**

1. **Simplify the permit** by using the presumptive approach when applying BMPs and corrective action in response to bench mark monitoring. If benchmarks are exceeded:
  - a. BMPs would be chosen from the stormwater manual and installed. Ecology could take it a step further and list the basic BMPs that all sites should have and also further prescribe industry specific BMPs. For example:
    - i. Basic BMPs for all sites
      1. Site Sweeping
      2. Catch Basin Clean Out
      3. System sediment clean out
    - ii. Industry specific examples that permittees can choose from (transportation as an example). Implement at least "x" number of BMPs.
      1. Roofs over outside storage
      2. Berms – up gradient and around high risk pollution activities
      3. Coating of Zinc roofs
      4. Stormwater filter installation for metals
      5. Etc.
  - b. Compliance would be measured by verifying that BMPs are implemented in accordance with the permit.
2. **Make sure there is enough time to:**
  - a. Budget for bmp implementation
  - b. Build the BMPs
  - c. And monitoring bmp effectiveness prior to moving into the next leave of corrective action (this has not been the case in past permits if you happen to consistently exceed bench marks). BMP implementation monitoring would be a compressed monitoring scheme to show that your BMP is working.
  - d. You either act (**IMPLEMENT BMPs - this should be the basic goal of the permit**) your way back to standard monitoring or chose to off ramp to an Individual Permit for the demonstrative approach. The compressed monitoring answers the question – is the bmp I just installed being effective?
    - i. if not, implement additional BMPs.
    - ii. If yes, go back to routine monitoring.

