

## Summary of Significant Changes to the 2015 Industrial Stormwater General Permit

Permit Section(s)	2010 ISGP	2015 ISGP
<b>S1. Permit Coverage</b>		
S1.A Facilities required to seek permit coverage	<i>SIC 4953: Active landfills, including, but not limited to, wood waste and inert landfills, transfer stations, open dumps, compost facilities, and land application sites, except as described in S1.C.6 or C.7.</i>	<i>SIC 4953: Active Landfills Refuse Systems, including, but not limited to, <del>wood waste and inert</del> landfills, transfer stations, open dumps, <del>compost facilities</del>, and land application sites, except as described in S1.C.6 or C.7.</i>  Note: Compost Facilities moved from SIC 4953 to SIC 28xx
S1.D Facilities excluded from permit coverage	N/A	Added:  <u>40 CFR 449.11(a) Airports with more than 10,000 annual jet departures.</u>
S1.D Facilities excluded from permit coverage	<i>Facilities located on Tribal lands or facilities that discharge stormwater to receiving waters subject to water quality standards of Indian Tribes, including portions of the Puyallup River and other waters on trust or restricted lands within the 1873 Survey Area of the Puyallup Tribe of Indians Reservation.</i>	Summary: Clarified that ISGP is not applicable on “Indian Country” as defined in 18 U.S.C. §1151, except specific portions of the Puyallup Reservation.  Refer to ISGP Condition S1.D.4 for full language.  Note: U.S. EPA’s Multi-Sector General Permit applies to areas where the ISGP does not.
<b>S3. Stormwater Pollution Prevention Plan</b>		
S3.A.3 Proper Selection and Use of Stormwater Management Manuals	<i>Stormwater Management Manual for Western Washington (2005 edition), for sites west of the crest of the Cascade Mountains.</i>	<i>Stormwater Management Manual for Western Washington (<del>2005</del> 2012 edition), for sites west of the crest of the Cascade Mountains.</i>
S3.A/B SWPPP Updates	Update SWPPP to be consistent with 2010 ISGP by 7/1/10	Update SWPPP to be consistent with 2015 ISGP by 1/30/15
S3.B Specific SWPPP requirements;  Operational Source Control; Preventative Maintenance	N/A	New Language:  <u>Maintain ponds, tanks/vaults, catch basins, swales, filters, oil/water separators, drains, and other stormwater</u>

Note: This document contains summaries of key changes; please refer to the 2015 ISGP for complete information. Language in *italics* is actual permit language. Underlined language is new, and ~~struck~~ language was deleted.

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		<u>drainage/treatment facilities in accordance with the Maintenance Standards set forth in the applicable Stormwater Management Manual (SWMM), other guidance documents or manuals approved in accordance with S3.A.3.c., demonstrably equivalent BMPs per S3.A.3.d., or an O&amp;M Manual submitted to Ecology in accordance with S8.D.</u>
S3.B Specific SWPPP requirements; Inspections and Recordkeeping	N/A	At a minimum the SWPPP shall:  <u>f) Include all inspection reports completed by the Permittee (S7.C).</u>
<b>S4. Sampling and S5. Benchmarks and Effluent Limitations</b>		
S4.B.2 Sample Location(s)	d. The exception to sampling each point of discharge in S4.B.2.c does not apply to any point of discharge subject to numeric effluent limitations (Conditions S5.C, S6.C & S6.D).	d. <del>The exception to sampling each point of discharge in S4.B.2.c does not apply to any point of discharge subject to numeric effluent limitations (Conditions S5.C, S6.C &amp; S6.D).</del>  New Language:  <u>d. The Permittee shall notify Ecology of any changes or updates to sample locations, discharge points, and/or outfalls by submitting an “Industrial Stormwater General Permit Discharge/Sample Point Update Form” to Ecology.</u>  Refer to Appendix 2 for definition of <i>Substantially Identical Discharge Point</i> .
S4.B.3.h Sample Documentation	Summary: Not required to record weather conditions at time of sampling.	Summary: Permittees must record weather conditions at time of sampling.  Existing Permit Language:  <i>For each stormwater sample taken, the Permittee shall record the following information and retain it on-site for Ecology review:</i>  New Language:  h. <u>Weather conditions.</u>
S4.B.6 Consistent Attainment	Summary:  Consistent attainment limited to samples collected	Summary of change:  Consistent attainment may be based upon samples collected prior to effective date of

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	after effective date of permit.	<p>2015 ISGP.</p> <p>Once consistent attainment is achieved, may suspend sampling for a period of 3 years, regardless of expiration of 2010 ISGP or effective date of 2015 ISGP.</p> <p>Refer to Condition S4.B.6 for new language.</p>
<p>S5.A.3. Benchmark and Sampling Requirements; and</p> <p>S5.B.2. Additional Sampling Requirements for Specific Industrial Groups</p>	<p><i>Permittees monitoring more than once per quarter shall average all of the monitoring results for each parameter (except pH and “visible oil sheen”) and compare the average value to the benchmark value.</i></p>	<p>Summary of Change: Language added to specify methodology for averaging multiple values collected during a single 24-hr period.</p> <p>Existing Permit Language:</p> <p><i>Permittees monitoring more than once per quarter shall average all of the monitoring results for each parameter (except pH and “visible oil sheen”) and compare the average value to the benchmark value.</i></p> <p>[Clarifying Language Added:]</p> <p><u>However, if Permittees collect more than one sample during a 24-hour period, they must first calculate the daily average of the individual grab sample results collected during that 24-hour period; then use the daily average to calculate a quarterly average.</u></p>
<p>S5.B. Table 3: Additional Benchmarks and Sampling Requirements Applicable to Specific Industries</p>	<p>Summary: Limited TPH-Dx sampling/benchmark to SICs 10xx, 33xx, 34xx, 5015, 5093, and Hazardous Waste Treatment, Storage and Disposal Facilities</p>	<p>Summary of Change: Expanded the applicability of Petroleum Hydrocarbons Benchmark (10 mg/L NWTPH-Dx ) to Transportation Facilities in SICs 40xx – 45xx (except 4221-25), and Petroleum Bulk Stations and Terminals (5171).</p> <p>Refer to Condition S5.B. Table 3.</p>
<p>S5.C Landfills and Airports Subject to Effluent Limitation Guidelines</p>	<p>N/A</p>	<p>Add:</p> <p>Ammonia (Total as N); 14.7 mg/L Maximum Daily Limit</p> <p>Affected Facilities:</p> <p>Airports with 1,000+ annual jet departures that use urea-containing deicing products</p>

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		Refer to Condition S5.C. Table 5
<b>S6. Discharges to Impaired Waterbodies</b>		
S6.C. Additional Sampling Requirements and Effluent Limits for Discharges to Certain Impaired Waterbodies and Puget Sound Sediment Cleanup Sites	N/A	[Clarifying Language Added:] <i>If an outfall is subject to an impaired waterbody effluent limit (Condition S6.C) for a parameter that also has a benchmark (Condition S5), the effluent limit supersedes the benchmark.</i>
S6.C. Additional Sampling Requirements and Effluent Limits for Discharges to Certain Impaired Waterbodies and Puget Sound Sediment Cleanup Sites	Summary of 2010 ISGP: If receiving water is Category 5 for Sediment: <ul style="list-style-type: none"> <li>• Sample TSS quarterly</li> <li>• 30 mg/L TSS limit, effective 1/1/10; unless compliance schedule granted.</li> </ul>	Summary of Change: If receiving water is Category 5 for Sediment: <ul style="list-style-type: none"> <li>• Sample TSS quarterly</li> <li>• 30 mg/L TSS limit, effective 1/1/17; but if discharge was subject to TSS limit under 2010 ISGP, TSS limit effective 1/1/15.</li> </ul> If Non-Category 5 Puget Sound Sediment Cleanup Site (Defined in Appendix 2): <ul style="list-style-type: none"> <li>• Sample TSS quarterly</li> <li>• 30 mg/L TSS benchmark, effective 1/1/17</li> <li>• If discharge is subject to different TSS benchmarks, the lower benchmark controls.</li> </ul> Discharges to ISGP-defined Puget Sound Sediment Cleanup Sites are subject to additional storm drain line cleaning BMPs, solids sampling, and reporting. (See S6.C)
S6.D. Requirements for Discharges to Waters with Applicable TMDLs	N/A	[Clarifying Language Added:] <i>If an outfall is subject to a TMDL-related effluent limit (Condition S6.D) for a parameter that also has a benchmark (Condition S5), the effluent limit supersedes the benchmark.</i>
<b>S8. Corrective Actions</b>		
S8. B.1. Level One Corrective Actions – Operational Source Control BMPs	1. <i>Within 14 days of receipt of sampling results that indicate a benchmark exceedance:</i>	[Language added to clarify how the 14-day response time works with quarterly averages (S5.A.3, S5.B.2 and/or S6.C.2.c)] 1. <i>Within 14 days of receipt of</i>

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		<i>sampling results that indicate a benchmark exceedance <u>for a given quarter; or, for parameters other than pH or visible oil sheen, the end of the quarter, whichever is later:</u></i>
S8. C. Level Two Corrective Actions – Structural Source Control BMPs	N/A	[Clarifying Language Added:] <i><u>While a time extension is in effect, benchmark exceedances (for the same parameter) do not count towards additional Level 2 or 3 Corrective Actions.</u></i>
S8.D.2.	<p><i>A licensed professional engineer, geologist, hydrogeologist, or Certified Professional in Storm Water Quality (CPSWQ) shall design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.</i></p> <p><i>i. Ecology may waive the requirement for a licensed or certified professional upon request of the Permittee and demonstration that the Permittee or treatment device vendor can properly design and install the treatment device; or the treatment BMP doesn't require site-specific design or sizing (e.g., off-the-shelf filtration units, etc.).</i></p> <p><i>ii. Ecology will not waive the Level 3 requirement for a licensed or certified professional more than one time during the permit cycle.</i></p>	<i><u>A Qualified Industrial Stormwater Professional shall review the revised SWPPP, sign the SWPPP Certification Form, and certify that it is reasonably expected to meet the ISGP benchmarks upon implementation. Upon written request Ecology may, one time during the permit cycle, waive this requirement on a case-by-case basis if a Permittee demonstrates to Ecology's satisfaction that the proposed Level 3 treatment BMPs are reasonably expected to meet ISGP benchmarks upon implementation.</u></i>
S8.D. Level Three Corrective Actions – Treatment BMPs	[Summary:] Before installing engineered structures, Permittee shall submit an engineering	[Summary:] Before installing engineered structures, Permittee shall submit an engineering report, plans and specifications, and an

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	<p>report, plans and specifications, and an O&amp;M Manual to Ecology for review in accordance with Chapter 173-240 WAC.</p> <p>(See 2010 Condition S8.D)</p>	<p>O&amp;M Manual to Ecology for review. The engineering report must address 7 elements set forth in S8.D.3.a.</p> <p>O&amp;M Manual submitted to Ecology no later than 30 days after installation.</p> <p>(See 2015 ISGP Condition S8.D)</p> <hr/> <p>[Clarifying Language Added:]</p> <p><i><u>While a time extension is in effect, benchmark exceedances (for the same parameter) do not count towards additional Level 2 or 3 Corrective Actions.</u></i></p>
<b>S9. Reporting and Recordkeeping</b>		
S9.A Discharge Monitoring Reports	<p>[Summary:]</p> <p>DMRs and other written reports must be submitted electronically or by mail.</p>	<p>[Summary:]</p> <p>DMRs and other written reports must be submitted electronically (Water Quality Permitting Portal), unless waiver granted.</p> <p>Clarified first DMR due date when facility obtains permit coverage mid-permit cycle.</p>
S9.B. Annual Reports	N/A	Clarified that Annual Reports are not required if the permittee didn't have permit coverage during the previous calendar year.
S9.B. Annual Reports	N/A	<p>[Clarifying Language Added:]</p> <p><i><u>Primary airport permittees with at least 1,000 annual jet departures shall include a certification statement in each annual report that it does not use airfield deicing products that contain urea. Alternatively, permittees shall meet the numeric effluent limit for ammonia in Condition S5.C. Table 5.</u></i></p>
S9.E. Reporting Permit Violations	<p>[Summary:]</p> <p>Written reports of non-compliance must be submitted within 30 days.</p>	<p>[Summary:]</p> <p>Written reports of non-compliance must be submitted within 5 days; may be waived on a case by case basis, if phone notification occurs within 24 hours.</p> <p>All written reports must be submitted electronically, unless waiver granted.</p>

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<b>Appendix 2 - Definitions</b>		
Appendix 2 - Definitions	N/A	<p>[Summary:] Several new definitions added:</p> <ul style="list-style-type: none"> <li>Airfield Pavement</li> <li>Airside</li> <li>Annual Non-propeller Aircraft Departures</li> <li>Average</li> <li>Daily Average</li> <li>Deicing</li> <li>Discharge Point</li> <li>First Fall Storm Event</li> <li>Outfall</li> <li>Puget Sound Sediment Cleanup Site</li> <li>Responsible Corporate Officer</li> <li>Substantially Identical Discharge Point</li> </ul>