

This summary contains recommendations that received a median score of four and above for priority.

| Potential Recommendation                              |  |
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| <b>BMPs, SWPPPs, AKART, &amp; Presumed Compliance</b> |  |
| 1   | Clarify that appropriate and consistent BMP installation is AKART.   |
| 1   | Maintain the presumption that BMPs will protect water quality, especially for "ordinary" stormwater.   |
| 2   | Make compliance with the ISWGP conditional upon full implementation of the SWPPP, where BMPs are defined, maintained and inspected with documentation.   |
| 2   | Make permittees specify BMPs in their SWPPP, and have Ecology or a certified third party review and approve SWPPPs, and follow up with inspections and enforcement to ensure appropriate BMP usage.  |
| 3   | Provide prescriptive BMPs, tailored by industry sector, to permittees. Measure compliance by verifying that BMPs are implemented in accordance with the permit.  |
| 3   | Define prescriptive BMPs by industry sector in the stormwater manual or model SWPPP, for example, roofs over outside storage, berms – up gradient and around high risk pollution activities, zinc roof coatings, stormwater filter installation for metals, etc.   |
| 4   | Develop model SWPPPs for small business and/or certain industry types, which would be a "fill-in-the-blank" approach or option. The model SWPPP must fully respond to the mandatory requirements in the ISWGP and be in place at the time of permit adoption.  |
| 5   | Make the permit less complex, with very clear requirements, technical assistance, and "ruthless" enforcement.  |
| 6   | If requiring permittees to upgrade BMPs provide enough time to budget for BMP implementation, build the BMPs, and monitor for BMP effectiveness prior to moving into the next level of corrective actions.   |
| <b>Technological Solutions</b>                        |  |
| 7   | Continue development of the discharge and site characterization model initiated by Kennedy-Jenks. Utilize it to ID priority sites based on probability to exceed water quality standards. Allow permittees to either use the standard target levels in the general permit, or the site-specific modeling tool to identify targets based on site and receiving water body characteristics.            |
| 8   | Develop central internet hub for information – including a SWPPP "wizard," permit information, and BMP marketplace.  |
| 9   | Form a working group of technical suppliers and engineers, with good peer review, to document performance and cost data for BMPs and make that available to permittees and Ecology in a "BMP Marketplace."   |
| 10  | Develop an e-reporting system, and the ability for DMR and permittee information to be displayed on an interactive map.  |
| <b>Permit Policy Mandates</b>                         |  |
| 11  | Define one set of target values, instead of both Action Levels and Benchmarks.   |
| 12  | Look at concentration and mass loading of contaminants being discharged by permittees to trigger permit requirements. Hold permittees to different standards based on units of flow and mass being discharged.   |
| 13  | Give permittees who do not consistently achieve an action level following Level 3 corrective actions the option between moving to an individual permit OR the Level 4 response, as proposed by Ecology.  |
| 14  | Use the safe harbor concept regarding technical assistance – provide a safe harbor if a permittee requests technical assistance from Ecology on SWPPP development and implementation. If the permittee puts in a good faith effort to comply with the permit, then no Ecology enforcement action. Follow model of Labor & Industries program, embodied in RCW 49.17.250.                             |
| 15  | Extend ISWGP coverage to industries who may not be in the appropriate SIC codes, but have activities that warrant permitting – structure coverage requirements based on activities rather than SIC code.   |
| <b>Program Administration Solutions</b>               |  |
| 16  | Review outreach strategies for any education/training. Create content-appropriate material and a communication style for the permittee-level of understanding. Base material on a survey, consider dissemination through small business and industry associations, ports, local government building/land use departments, Dept of Revenue, etc. Consult with those groups on funding, delivery, etc. |
| 17  | Make the program financially self-sustaining based on its permit fees.   |
| 18  | Move permittees into a parallel status for the transition, whether they were at level 2 or 3, and do not let them go backward or gain additional time for compliance. But permittees shouldn't be trapped in the existing system if it is not working.   |
| <b>End of Process Recommendations</b>                 |  |
| 19  | Bring unpermitted industrial stormwater dischargers into the permit.   |
| 20  | Make technical assistance a permit requirement within 90 days of permit coverage.  |
| 21  | The goal of getting BMPs assessed and implemented ASAP could include employee training and prioritizing businesses with no sampling, no level responses.   |
| 22  | Enforcing the current permit does not protect water quality because the permit does not protect water quality. Let's fix the permit!   |
| 23  | Allow stakeholders to write permit language and develop tools that Ecology can use to implement a better permit.   |