

# Cal Noling's Preliminary Analysis of ISWGP's from Other States

## Objective

Identify models of ISWGP programs nationally that have:

- proven more effective for bringing about measured improvement in water quality or benchmark compliance
- demonstrate high permittee accountability and environmental performance

## Data Sources

- Colleagues in the stormwater BMP industry, stormwater consultants
- EPA Regional industrial Stormwater Contacts
- Shortlist State ISGP Contacts

## Shortlist States

- Industry sector specific permits
- Rumored higher level of enforcement - media
- Confirmation with state regulators

### Surveyed

WI

AL

NC, NY, IN

### LM - Awaiting call back

CO

NJ

### To be contacted

CA - 9 regions

GA

## Findings, general:

- Enforcement seems to be key to measured change in stormwater P2
  - Pockets of high enforcement driven by individual regulator initiative, regional
  - States seem to be focused on visual impacts over chemical impacts (visual monitoring, erosion control - construction permits)
  - Environmental group initiative to bring about policy change and sw program expedition is a factor contributing to forward progress
  - Regulatory staffing limitations is a universal factor contributing rate of forward progress
  - Early discussions about "fee funded positions"
  - Trend is toward industry specific permitting - scrap metals recycling, automobile dismantling
  - Trend is toward increased frequency of chemical monitoring and data submittal
  - WA is ahead with regard to measuring water quality progress: chemical monitoring, data submittal, quantitative analysis and response program
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