

Statement of Basis for WSDOT Permit Modification in 2011

Special Condition S6.C of WSDOT permit requires Ecology to modify this permit or issue an administrative order to establish new TMDL-related permit requirements at least every eighteen months for TMDLs associated with discharges from WSDOT facilities that EPA has approved during the preceding eighteen months. In addition to adding the new TMDL-related requirements, this modification provides clarifications in various sections of WSDOT permit including S6 (TMDL), Appendix 7 (Stormwater Management Program Plan), reference to the newly updated (2011) Highway Runoff Manual (HRM) instead of 2008 HRM, and correcting typographical errors. Specific changes include:

1. **S5.4** – As the 2008 HRM is updated, Ecology reviews the updates in the newer versions of HRM for equivalency with the Ecology stormwater management manuals. Ecology modified this section to make reference to the HRM versions updated in 2010 and 2011.
2. **S6.A** – Added “or subsequent permit modifications” to the second sentence to include applicable TMDLs after the issuance date of this permit in 2009.
3. **S8.E.5** – Corrected typographical error from “preformed” to “performed”.
4. **APPENDIX 1** – In addition to referencing the 2008 HRM, Ecology added references to the later updates to HRM dated 2010, and 2011.
5. **APPENDIX 3** – Added new TMDLs and their requirements.
6. **APPENDIX 7, Section 2.4** – Deleted “... participates on the New Products Committee and” to reflect reorganization of responsibilities within WSDOT.
7. **APPENDIX 7, Section 3.2** – Changes made to the second paragraph to make it consistent with the permit notification requirements contained in G.3.
8. **APPENDIX 7, Section 3.2** – Phone number clarification made.
9. **APPENDIX 7, Section 5.3** – Corrected typographical error in table from “ensure” to “insure”.
10. **APPENDIX 7, Section 7.1.2** – In addition to referencing the 2008 HRM, Ecology added references to the later updates to HRM dated 2010, and 2011.
11. **APPENDIX 7, Section 7.2.3, *Ditch, Channel, and Culvert Maintenance*** – Corrected typographical error in table from “then” to “than”.
12. **APPENDIX 7, Section 7.2.3, *Ditch, Channel, and Culvert Maintenance*** – Last sentence changed to more accurately reflect WSDOT’s culvert maintenance strategy.
13. **APPENDIX 7, Section 7.2.4** - Clarifying language requiring “WSDOT shall correct stormwater BMP deficiencies as discovered” making it consistent with the language in NPDES stormwater permit issued to local governments.
14. **APPENDIX 7, Section 7.2.6** – Corrected typographical error in table from “ensure” to “insure”.
15. **APPENDIX 7, Section 7.3.5** – Reducing sweeping frequency as an adaptive management response based on the results of annual inspections of Washington State Ferries stormwater features by WSDOT’s terminal maintenance staff .
16. **APPENDIX 7, Section 8.1** – Corrected typographical error in table from “citing” to “siting”.

- 17. APPENDIX 7, Section 8.2.2** – Changes made to reflect reorganization of responsibilities within WSDOT.
- 18. APPENDIX 7, Section 8.2.3** –Changes made to reflect reorganization of responsibilities within WSDOT.
- 19. APPENDIX 7, Section 8.2.4** –Changes made to reflect reorganization of responsibilities within WSDOT.
- 20. APPENDIX 7, Section 8.5** – Changes made to reflect reorganization of responsibilities within WSDOT.
- 21. APPENDIX 7, Section 9.1.1** – Corrected typographical error in table from “in” to “is”.
- 22. APPENDIX 7, Section 9.2.1** – The latest updates to HRM are found in the November 2011 version.