

City of Tacoma

Thank you for the opportunity to comment. Tacoma appreciates Ecology's work together approach during this permit reissuance cycle. Our comments are within the spreadsheet. there are four comments within the spreadsheet that refer to the attachments. Please contact Merita Trohimovich 253-502-2103 if you have any questions or concerns regarding our comments. Thank You.

Phase I, WW Phase II, and EWA PH II Formal Draft Comments				
Response #	Document	Section	Page	Comment
	All Three Permits	General	NA	Throughout the Permit cycle, ensure the Primary Contact person listed in item D. of the "Duty to Reapply-Notice of Intent for Coverage" submitted by each permittee receives written notification of any new Permit requirements, guidance documents or other pertinent information.
	Phase I	Authorized Discharges	6	S2.A - Provide a definition for surface waters.
	Phase I	Permit Coverage Area and Permittees	6	S1.D - The concept of Co-Permittee is confusing. Is this a necessary Permittee type - considering Secondary Permittees and Phase II Permittees? What is an example?
	Phase I	Authorized Discharges	7	S2.A - For those non-authorized discharges (such as UIC) state the permit under which they are authorized in Washington.
	Phase I	Compliance with Standards	8	S4.A - RCW 90.48.520 does not appear to be the appropriate reference. Verify and revise as necessary.
	Phase I	Compliance with Standards	9	Ensure consistency amongst all Permit sections with the use of "Waters of the State". Consider always using "Waters of the State" which has a definition. Section S4.E uses waters of the State of Washington.
	Phase I	Compliance with Standards	9	Consider changing S4.F.1 to state "...is potentially causing or contributing..." The inclusion of potentially is necessary because according to S4.F.2, Ecology makes the determination if the discharge is causing or contributing not the Permittee.
	Phase I	Mapping and Documentation (WWA)	13	Consider revising the Title to say MS4 Asset Management
	Phase I	Mapping and Documentation (WWA)	13	Consider revising the Ongoing and New Mapping to be one section with specific dates called out for items that have a specific start date.
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.a: Consider changing the language to: "maintain and update as needed an asset management program that can display on a map the following features listed below"
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.a - Define "surface water"; it is included in the definition of receiving waters and is required to be a mapped feature. Consider using waters of the state or receiving waters instead of surface water.
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.a.iii - Define "stormwater treatment and flow control facilities owned or operated by the Permittee".
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.a.iii - Define "associated emergency overflows".
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.a.iv - Define "geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface water". Does this include discharge from areas that utilize infiltration and dispersion and areas that discharge to the wastewater system? What about those facilities that infiltrate through a UIC - since those discharges are not covered by the Permit are the areas discharging to a UIC required to be mapped?
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.a.v - Define "equivalent cross-sectional area".
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.a.v - Define "associated drainage areas" and "land uses".
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.a.vi - Define "public entities".
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.b.i - Clarify if this means to retroactively go back and map size and material for known mapped outfalls or if it is a requirement for new or newly discovered outfalls only.
	Phase I	Mapping and Documentation (WWA)	13	S5.C.2.b.i - Clarify if size is meant to be nominal pipe diameter.
		Mapping and Documentation (WWA)	14	S5.C.2.b.ii - Define "privately-owned stormwater systems".
	Phase I	Mapping and Documentation (WWA)	14	S5.C.2.c - Include the example electronic standards as an appendix or describe the exact location on the Ecology's website where the electronic standards are found.

Phase I	Mapping and Documentation (WWA)	NA		<p>It appears to be Ecology's intent to publish the "Draft Mapping Guidance for Phase I and Western Washington Phase II NPDES Municipal Stormwater Permittees" without a formal public comment period. This was affirmed in an email from Emma Trewhitt dated 9/25/18. The City would like to reiterate comments made as follows related to the Guidance:</p> <p>a. Under additional guidance for tributary conveyances note that catch basin leads are not required to be mapped.</p> <p>b. Under Figure 5 update the language about the stormwater treatment and flow control BMPs because previous language states that all permeable pavement would be mapped even if it was used to meet MR#6 or MR#7. In this figure, would the area contributing to the bioretention facility and the area contributing to the permeable pavement be mapped as geographic areas not discharging to surface water or would just the bioretention area be mapped because the permeable pavement (from the picture) does not infiltrate 100% of the stormwater?</p> <p>c. Under Figure 7, it appears that the private outfall is required to be mapped as an outfall, is that correct?</p> <p>d. In Figure 11 is the Permittee required to map the geographic area because this is considered to be a UIC and would not be covered under the Permit?</p>
Phase I	Coordination	15		S5.C.3.b the 2013 permit contained the statement at the end of this section which stated, "Failure to effectively coordinate is not a permit violation provided other entities, whose actions the Permittee has no or limited control over, refuse to cooperate." Reinstated this provision.
Phase I	Public Involvement and Participation	15		S5.C.4.a - Provide additional guidance to describe opportunities where public input could direct SWMP implementation. SWMP elements are highly prescriptive and so it would be helpful for Ecology to provide ideas of where they anticipate public input might be incorporated in a meaningful way.
Phase I	Controlling Runoff (WWA)	15		S5.C.5 - The title should be bold.
Phase I	Controlling Runoff (WWA)	15		S5.C.5 - Define "redevelopment" and "construction activities" in the definitions section.
Phase I	Controlling Runoff (WWA)	16		It is unclear what happens from November 24, 2020 (the date where the existing program must end - S5.a.iv) to July 1, 2021 (date of adoption of new standards - S5.C.5.b.iv)? Revise so there is no gap in compliance. By giving each permittee a distinct compliance date there are gaps in the compliance deadlines for each jurisdiction. It is recommended to follow a compliance schedule similar to that set out in the 2013 Permit and apply to all jurisdictions.
Phase I	Controlling Runoff (WWA)	16		It is not clear how the existing program and the new program are applied and the associated dates. Suggest reorganizing this section for clarity. The statements under S5.C.5.a seem to contradict S5.C.5.a.i through vi. Please Clarify.
Phase I	Controlling Runoff (WWA)	16		Define "site scale" and "subdivision scale".
Phase I	Controlling Runoff (WWA)	16		Reorganize S5.C.5.b.i into a bulleted list that says each thing that must be included in ordinances as separate line items.
Phase I	Controlling Runoff (WWA)	16		S5.C.5.b.i - Define "Ecology approved basin plans or other similar water quality and quantity planning efforts".
Phase I	Controlling Runoff (WWA)	17		S5.C.5.b.ii (f) - Remove BMP limitations as these are inherently part of the BMP design criteria.
Phase I	Controlling Runoff (WWA)	17		S5.C.5.b.iii - Revise language to state that this section is only necessary if the Permittee intends to utilize an equivalent manual.
Phase I	Controlling Runoff (WWA)	17		S5.C.5.b.iii.(a).typo SWMMWW should be SWMMWW
Phase I	Controlling Runoff (WWA)	17		S5.C.5.b.iii.(a).(i) - This section needs very clear guidance. The term "section" is ambiguous. It is unclear if Ecology will be approving new sections or if the applicant must just submit the rationale. It is unclear why Ecology requires review and approval of this section of the Permit but not other Permit sections that require Ecology approval. Consider making this process not part of the Permit because in the end it is the Permittee's responsibility to ensure AKART.
Phase I	Controlling Runoff (WWA)	17		
Phase I	Controlling Runoff (WWA)	17		The second paragraph of S5.C.5.b.iv, appears to be redundant with or possibly in conflict with S5.C.5.b.iii. Please clarify and revise as needed.
Phase I	Controlling Runoff (WWA)	17		S5.C.5.b.iv.(a) "Permittees shall provide detailed, written justification of any of the requirements which differ from those contained in Appendix 1 and Appendix 10, Part 2". Is the written justification required to be submitted to Ecology for review and approval. If so, is G19 certification required. In the Permit whenever it states to provide anything written describe if these items require submission to Ecology and G19 certification.
Phase I	Controlling Runoff (WWA)	18		S5.C.5.b.v - Define "private stormwater facilities".

Phase I	Controlling Runoff (WWA)	18	S5.C.5.b.vi - Consider revising language to make the intent more clear (suggested language follows): :The program shall include a mechanism to ensure all new development, redevelopment and construction projects that meet the thresholds in Appendix 1 have a review, inspection, and enforcement process that ensures compliance with the Minimum Requirements in Appendix 1. At a minimum, the program shall be administered by qualified personnel and include the following standards for compliance:..."
Phase I	Controlling Runoff (WWA)	18	S5.C.5.b.vi.(b). Define "permitted development sites". Define "construction sites". Alternatively, for clarity, consider revising the language to state: Inspect, prior to start of work, all new development, redevelopment, and/or construction sites that meet that thresholds..."
Phase I	Controlling Runoff (WWA)	18	S5.C.5.b.vi.(b) - Consider revising this section to just be TESC BMP installation. vi.(c) could then be maintenance inspections and (d) would be final inspection.
Phase I	Controlling Runoff (WWA)	18	S5.C.5.b.vi.(c). Define "permitted development sites".
Phase I	Controlling Runoff (WWA)	18	S5.C.5.b.vi(d). Define "permanent stormwater facilities".
Phase I	Controlling Runoff (WWA)	18	S5.C.5.b.vi.(a & e). It is possible to meet the threshold for new development and redevelopment without being a land disturbing activity. Is the intent to only require inspection of those projects that alter the soil cover conditions?
Phase I	Controlling Runoff (WWA)	18	S5.C.5.b.vi.(f) - Define "scheduled inspection". Alternatively, state required inspections.
Phase I	Controlling Runoff (WWA)	19	S5.C.5.b.vii - Describe "make available". Ecology requires electronic submission of NOIs - it is unclear how a municipality makes Ecology's website available to the public. Suggest removing this paragraph.
Phase I	Controlling Runoff (WWA)	19	S5.C.5.b.vii - Consider removing this section as Section S5.C.5.b.vi states that qualified personnel must conduct the activities. The definition for qualified personnel states that it is someone who has professional training. This section seems redundant. If this section will remain remove "As determined necessary by the Permittee,"
Phase I	Comprehensive Stormwater Planning (WWA)	19	S5.C.6. The first sentence is unclear, there is a grammatical error and the words used in the introduction paragraph are not the same as those in a.i which is confusing and unclear. Revise for consistency.
Phase I	Comprehensive Stormwater Planning (WWA)	19	Provide a deadline for when the interdisciplinary team must be convened. The City suggests August 2020.
Phase I	Comprehensive Stormwater Planning (WWA)	19	S5.C.6.a.i - It makes more sense to include the description of S5.C.6 in the SWMP Plan as opposed to the Annual Report each year. Revise language.
Phase I	Comprehensive Stormwater Planning (WWA)	19	In S5.C.6.a.i it states to describe certain items in the Annual Report. In S5.C.6.a.i.(a) and a.i.(b) deadlines are provided for different but similar items. It is unclear if Ecology is requesting two separate reports that are separate from the SWMP Plan and Annual Report. If this is the case, call the reports by a separate and distinct name so the Permittee knows which documents they are required to create. Update the Permit language to clarify the relationship between the two reporting requirements and deadlines.
Phase I	Comprehensive Stormwater Planning (WWA)	19	S5.C.6.b.i.(a) The requirement for the LID report to include "mechanisms adopted to encourage or require implementation of LID Principles or LID BMPs" appears to be an additional behavior change program requirement that may or may not be the one program selected by the Permittee to pursue under Section S5.C.11. This appears to be a "hidden" additional behavior change requirement and should be revised to avoid conflict with Section S5.C.11. Suggest adding "if applicable" to the end of the last sentence.
Phase I	Comprehensive Stormwater Planning (WWA)	19	S5.C.6 - The requirement states to convene an interdisciplinary team with no deadline. And there is an annual report question asking if the team has been convened. Please clarify the deadline.
Phase I	Structural Stormwater Controls (PH I)	Whole Section	A large and more formal stakeholder process during the 2019-2023 Permit is needed to improve S5.C.7 requirements through scientific and stakeholder input. This is necessary to ensure that the projects types, their descriptions and requirements and the incentive point factors reflect best available science and stormwater management priorities for the state's stormwater structural retrofit programs and associated receiving waters as S5.C.7 and App 12 will drive Permittee's S5.C.7 priorities and investments. It is suggested to use a similar approach to that used by Ecology for the development of the 2007 Permit LID requirements and establish a committee or comparable process to update the S5.C.7 documentation and lead to a permit modification or change in the next permit term.
Phase I	Structural Stormwater Controls (PH I)	21	S5.C.7.a - Use the exact language as shown in Appendix 3 (or reference Appendix 3). For example, Appendix 3 shows 11 project types (specifically making LID BMPs their own project type). The Permit section does not - revise.
Phase I	Structural Stormwater Controls (PH I)	21	S5.C.7.a - Define the following: "new flow control facilities", "new treatment facilities", "retrofit", "small-scale projects".
Phase I	Structural Stormwater Controls (PH I)	21	S5.C.7.a - It is unclear from the Permit language if the applicant has to choose to utilize projects types from S5.C.7.a.i before choosing from S5.C.7.a.ii. It is unclear because S5.C.7.a.i uses "shall consider" and S5.C.7.a.ii uses "should consider". It is recommended to remove the two sections and allow Permittees to freely choose from any section as it has been proven that all options will provide some benefit to receiving waters.
Phase I	Structural Stormwater Controls (PH I)	22	S5.C.7.b.ii(e) and (f) - It is unclear how budget and public involvement are necessary for Permit compliance. Remove these items from the planning process requirements.

	Phase I	Structural Stormwater Controls (PH I)	22	S5.C.7.c The first sentence should be modified as: With each annual report, each Permittee shall provide a list of planned, individual projects scheduled for implementation during this permit term <u>for the purpose of meeting S5.C.7.d.</u>
	Phase I	Structural Stormwater Controls (PH I)	22	It is recommended that retrofit incentive points only apply to complete/maintenance stage projects. Planning stage projects may never be constructed so will not provide a water quality benefit. Recommend complete and maintenance projects only and lowering the overall total of incentive points needed.
	Phase I	Structural Stormwater Controls (PH I)	22	S5.C.7.d - Consider changing the name retrofit incentive points to SSC Program Points to avoid confusion with other terminology.
	Phase I	Structural Stormwater Controls (PH I)	22	S5.C.7.d - Any occurrences of incentive points should say retrofit incentive points.
	Phase I	Source Control Program (WWA)	22	S5.C.8.a - In general the way this section is written is confusing. The intent is to have a program to inspect and enforce upon (by requiring the application of BMPs) public and private entities that are causing water quality problems. S5.C.8.a.i could be construed to require that the Permittee apply BMPs to private properties which is likely not the intent. Consider revising all language in this section to clearly convey the program intent.
	Phase I	Source Control Program (WWA)	23	S5.C.8.b - Commercial and industrial properties are in a constant state of change as businesses are created, changed, and close. The effort to maintain a list of potential pollutant generating sources involves a large amount of time. Although the permit states that the inventory list is only required to be updated once every 5 years, it is unclear if the Permittee is required to maintain that list continually or just utilize the list as a one time compliance matrix. The City also recommends changing the frequency from once every five years to once per permit term in order to clarify required frequency. See our comments to Annual Report Question 34.
	Phase I	Source Control Program (WWA)	23	S5.C.8.b.ii - Define "commercial and industrial properties which have the potential to generate pollutants to the Permittee's MS4". It is unclear if this definition is meant to be defined by (a) and (b).
	Phase I	Source Control Program (WWA)	23	S5.C.8.b.ii.(b) - Define "other pollutant generating sources", "mobile business", "home-based businesses", and "multifamily properties". Consider removing examples and such as.
	Phase I	Source Control Program (WWA)	23	S5.C.8.b.i - It is stated that the source control requirements are those contained within Volume IV of the SWMMWW (which is the 2019 SWMM). Is an existing business meant to be held to the standards of each new SWMMWW and its new requirements for Source Control if it is already meeting the current standards?
	Phase I	Source Control Program (WWA)	24	S5.C.8.b.iii.(c) - Define "legitimate complaint. Define "sites" - the term is not used in the inventory creation but appears to be called out in the compliance metric. Alternatively, do not use the term "sites" and rewrite this item to state "Each Permittee shall investigate and inspect as appropriate 100% of legitimate complaints."
	Phase I	Source Control Program (WWA)	24	S5.C.8.b.iv - Define "sites". This term is not used in the inventory creation but is used in the compliance metric. Ensure consistent use of terms throughout Permit to avoid confusion.
	Phase I	IDDE	25	S5.C.9.a - Define "spills".
	Phase I	IDDE	26	S5.C.9.b.ii(b) - The second sentence sets defined activity requirements. This is not appropriate at this location in the permit. Public education activities related to lawn watering and water conservation do not appear to be one of the BMPs covered in Section S5.C.11. Remove the required activities from this paragraph and if needed add to S5.C.11.
	Phase I	IDDE	27	S5.C.9.c.i.(a) - It has been stated by Ecology staff that for purposes of this section the known conveyance system does not include catch basin leads or ditches. State this in the Permit. Consider limiting the conveyance system to a certain pipe size or some other metric that can reliably be inspected. In one sentence of this section it uses the term "conveyance system" and in the next sentence it uses the term "MS4". Please use consistent terms and clarify if this requirement is applicable to the entire conveyance system or if it is limited as has been the policy of Ecology Staff. Clarify what "on average, 12% of the Permittee's known conveyance system each year means" does this mean a permittee could do 8 percent one year and 16% the next?
	Phase I	IDDE	27	S5.C.9.c.i.(a) the permit section states to "track the total percentage..." Clarify the request and permit language. Would this be unique sections of the MS4 or if the section was re-investigated during the permit term would that be counted twice? If a section was visually inspected and then also inspected via downstream outfall monitoring would it be counted once or twice? Is the permit intent to track total screened or total unique screened. This could add a large workload to our current procedures for calculating this information. Why is it important and how will it be used? Clarify the annual report question and the permit section. It is also unclear how the yearly average will align with the first annual report. What is required for the first reporting period from Aug. 31 2019 to annual report (the time period would be 5% not 12%) . Clarify
	Phase I	IDDE	28	S5.C.9.d - Throughout this section include spill and illicit connections as appropriate where illicit discharge is used (S5.C.9.d.iv appears to make a very specific distinction). Alternatively, remove "including spills and illicit connections" and place that language in the definitions section. As written the program appears to apply to illicit discharges, spills, and illicit connections but the compliance metric is unclear as to intent. Please clarify and add additional language as necessary.
	Phase I	IDDE	28	S5.C.9.d.iv.(b) - Define "potential illicit discharge".

Phase I	IDDE	29	S5.C.9.g - The amount of information requested in Appendix 14 and WQWebIDDE is significant and will require significant manpower to record. The Fact Sheet states that this request for information was added to allow for analysis and interpretation for adaptive management purposes. Is it Ecology's intent to utilize the information obtained from the database to inform future Permits? The Permit itself does not appear to require an adaptive management approach that utilizes the data. In addition, Tacoma has been monitoring the types of spill material/source etc. since the early 2000's and the data we are collecting is not new or ground breaking and will not really help to steer the future of source control in the Puget Sound Region. The information requested by Ecology should be significantly reduced. Also see comments to Appendix 14 and the Ecology Focus Sheet.
Phase I	IDDE	29	S5.C.9.g - Permittee will need time to incorporate all the new fields into their tracking systems, make their tracking systems compatible with the new download requirements and train staff. This requirement needs a ramp up period of one year. Also see comments to Appendix 14 and the Ecology Focus Sheet. Tacoma would like to see this requirement significantly simplified in terms of the number of fields.
Phase I	Operations and Maintenance	29	S5.C.10.a references the Stormwater Management Manual for Western Washington but does not include equivalent manuals. Permittees are not required to have the Maintenance Standards in their SWMM reviewed for equivalency (per Appendix 10 Table 10.1) . It is unclear if Ecology intends that Permittees adopt the maintenance standards in the SWMMWW only or if Maintenance Standards from equivalent manuals can be used.
Phase I	Operations and Maintenance	30	S5.C.10.b.iii - define "new residential developments".
Phase I	Operations and Maintenance	30	S5.C.10.b.iii - Consider removing this requirement because it is already covered under S5.C.5 maintenance of TESC facilities. If this section will remain, require yearly inspection to coincide with the annual inspection requirements for stormwater treatment and flow control facilities/BMPS. This will help Permittees manage their workload if all inspection types are on a similar timeline. The effort to track new developments is an interdisciplinary effort and requires a distinct tracking program that includes land use planners and the development community which is cumbersome and hard to manage and does not appear to coordinate with the benefit. It may be more appropriate to just require that sites be fully stabilized if they have not had active construction for 6 months or more.
Phase I	Operations and Maintenance	30	S5.C.10.b.iv - The program requires the annual inspection of <u>all stormwater treatment and flow control BMPs/facilities</u> regulated by the Permittee (see S5.C.10.b.ii). The compliance goal of 80% applies to achieving inspection of 80% of all <u>sites</u> . The compliance metric of "sites" does not clearly correspond to the inspection requirements described in S5.C.10.b.ii and iii. Define "sites" or revise the compliance metric to match the inspection requirements of stormwater treatment and flow control BMPs/facilities and catch basins. It is recommended however to remove catch basins - see Tacoma's comment on S5.C.10.b.iii.
Phase I	Operations and Maintenance	30 and 31	S5.C.10.b.iv and S5.C.10.c.iii Consider revising the compliance goals of 80% and 95% to lower percentages. With the current staff numbers, there is insufficient time to provide sufficient enforcement and education to "trouble site owners" because the Permittee is trying to meet their inspection percentage goals. Credit should be given for each inspection as it is an opportunity to get someone into full compliance.
Phase I	Operations and Maintenance	31	S5.C.10.d - Remove all references to inlets from this section. The title of this section is specific to catch basins. In addition, the compliance metric is specific to catch basins and there is no Ecology maintenance standard for inlets and no required timeline for maintenance of inlets. Define catch basins applicable to this section.
Phase I	Operations and Maintenance	31	S5.C.10.d.i - Revise to state; "Each Permittee shall annually inspect <u>all</u> catch basins owned or operated." It appears that the "all" was inadvertently left out since alternatives that describe less than all are included within the section. Also, removing inlets will align with the section title and intent.
Phase I	Operations and Maintenance	32	S5.C.10.d.i.(b) - Clarify the language to state that the inspection of catch basins immediately upstream of any MS4 outfall, discharge point, or connection to public or private storm system is only intended to take place within circuits that are included in the circuit approach. Additionally, clarify the "if applicable". This paragraph also seems to imply that catch basins are installed inline with the conveyance system and that sediment would travel through the conveyance system and the catch basins and transfer and fill the downstream catch basins. This is not typically how systems are designed. "Extra" inspection of the catch basin upstream of an outfall or other discharge location is not particularly valuable based upon how systems are designed. Additionally, clarify if by "connections to public or private storm systems, it is intended to mean where the MS4 would flow into another public or private system, not just anytime a private system connects into the permittees MS4. Revise to state, "...connections from the MS4 to a public or private system". Additionally, the requirement to map connections from the MS4 to privately owned stormwater systems (S5.C.2.b.ii) has a completion date of August 1, 2021; it is unclear how the timing of that mapping requirement relates to the inspection requirements of this section.
Phase I	Operations and Maintenance	32	S5.C.10.d.i.(b) - Clarify this option, add language to the permit to clearly state that additional data analysis is needed and actions may be required based upon the results of the data analysis, or if that is not Ecology's intent, clarify that. It may be advisable to transfer some of the language from the guidance document to the permit section to clarify the requirements.
Phase I	Operations and Maintenance	32	S5.C.10.d.iii - The compliance metric only makes sense if the Permittee is using the standard requirement. A compliance metric must be defined for each alternative. Include compliance standards for each of the alternative programs (a), (b) and (c).
Phase I	Operations and Maintenance	32	S5.C.10.d.i. The City of Tacoma recommends adding an additional alternate compliance option. The option would be to inspect and clean all catch basins in a Permittee's system, twice within a permit term. Inspection and cleaning would be required once between the start of the permit term and December 31, 2021 and once between Jan 2022 and end of permit term. Compliance would be achieved by inspecting and cleaning 95% of the required catch basins within each cleaning cycle. The City of Tacoma would be happy to meet with Ecology to further discuss and suggest final permit language for this proposal.
Phase I	Operations and Maintenance	33	S5.C.10.f - After functions in the first sentence of this paragraph, add the word "that".

	Phase I	Operations and Maintenance	33	S5.C.10.g - Include a date for when SWPPPs must be updated. The date must be on or after the date of SWMM implementation because the SWPPPs are required to be updated to comply with the new BMPs of Volume IV of the SWMMWW.
	Phase I	Operations and Maintenance	34	S5.C.10.g.i Sentence one states "and a schedule for implementation of additional BMPs." Remove this phrase as additional BMPs may not be required and this phrase appears to imply that the use of additional BMPs is required.
	Phase I	Operations and Maintenance	34	S5.C.10.g.i This section references the SWMMWW. This section does not appear to allow the use of equivalent manuals so the Permittee would be required to utilize all BMPs from the 2019 SWMMWW and not their own SWMM. Is this the intent? Revise as necessary.
	Phase I	Education and Outreach	entire section / General	S5.C.11 The organization of this section is very confusing. There are so many levels and layers to the section, it is very difficult to reference them correctly. Ecology has even referenced them incorrectly in several places. See S5.C.11.a.ii.(d) - there reference is S5.C.11.b which does not exist. Reorganize this section to remove some of the levels. Note that the majority of the section falls under "a".
	Phase I	Education and Outreach	entire section / General	Define "program", "strategy", "element" and "campaign". Clarify the correct and consistent terminology. Throughout S5.C.11 these terms are used sometimes interchangeably and sometimes distinctly. Please define all and correct permit throughout S5.C.11.
	Phase I	Education and Outreach	34	Last paragraph of Page 34. There is some confusion about the terms program and element in this paragraph. Please define and clarify language. It is unclear if element and program are interchangeable or if an overall program has specific elements or if by program Ecology means the entirety of the work required under S5.C.11 or if a program is one audience and one BMP. Clarify language in the Permit.
	Phase I	Education and Outreach	34	S5.C.11. Last paragraph of Page 34. Clarify if a permittee elects to be part of a regional campaign for one audience/one BMP if they would have to include all pieces of the regional campaign or if they can implement the regional campaign as applicable to their MS4. This relates to the use of the terms "program" and "element".
	Phase I	Education and Outreach	35	S5.C.11.a - Second sentence - Define "local water quality information". Revise the last sentence of this paragraph for clarity as "shall consider" is both a must (requirement) statement and a optional statement.
	Phase I	Education and Outreach	35	S5.C.11.a - It will take significant time to get target audience characteristics, does Ecology intend for each municipality to find demographics on each target audience? This would take years to implement. Consider rewriting this section to ensure this requirement can be met within the Permit term.
	Phase I	Education and Outreach	35	S5.C.11.a - Define "area served by the MS4" or "revise to area served by the MS4 and within the jurisdictional boundaries". As written, this statement may push the required boundaries for this requirement outside the jurisdictional boundaries which may not be possible to achieve.
	Phase I	Education and Outreach	35	S5.C.11.a.i.(a) Ideally, the general awareness topics should lay the groundwork for and support desired behavior changes. The 2nd and 3rd subject areas seem too specific and detailed to accomplish this. It is suggested to replace the second and third subject areas with: Water Pollution Hotline Reporting (which would support desired behaviors related to the entire list of pollutant sources identified in the behavior change section S5.C.11.a.ii) and 3rd message to be chosen by the permittee based on the criteria outlined under Minimum Performance Measures S5.C.11.a.
	Phase I	Education and Outreach	35	S5.C.11.a.i.(a) - Under subject areas first bullet, form should read from.
	Phase I	Education and Outreach	35	S5.C.11.a.i.(a) - Leave home-based and mobile businesses out of the general awareness section for local jurisdictions. It has proven to be very difficult to find a communication method that would reach these types of businesses that may be active in local jurisdictions. Additionally, these terms are not defined and permittees are implementing them differently. Define terms and then determine if this would be appropriate.
	Phase I	Education and Outreach	35	S5.C.11.a.i.(a): Stewardship is also located within S5.C.11.a.iii and the requirements are inconsistent. Locate all stewardship requirements in one section and clarify the requirements.
	Phase I	Education and Outreach	35	S5.C.11.a.i.(a) and ii.(a) Clarify and define each target audience - what is meant by property managers/owners - would this include single family homeowners or is this targeting multi-family and commercial?
	Phase I	Education and Outreach	35	S5.C.11.a.i.(a); When specifying "overburdened communities" clarify how to identify this audience. There is no clear path from the definition to actually identifying "overburdened communities" within a jurisdiction. The City of Tacoma is committed to equity and helping "overburdened communities". However as written, this permit section appears to require permittees "single out" overburdened communities for extra emphasis. The definition of the term "overburdened communities" indicates that these communities are already over their ability to cope and are burdened with issues more than the general public. Why should overburdened communities be further singled out to do stormwater activities? We should instead make sure that all non-burdened populations are doing everything right first before we make a push at those that are already clearly working harder to just meet their basic needs. Additionally, "overburdened communities" may already be doing more then the general public for water quality if, for example, they cannot afford a car and so utilize public transportation. The City of Tacoma supports translation of materials into languages outside of English, we also support programs which would help increase water quality while providing specific services to overburdened populations, however, the permit language only seems to focus on targeting overburdened communities not increasing access or dual benefit programs for both stormwater benefit and decreasing the load on overburdened communities. Remove this specific audience from the permit.
	Phase I	Education and Outreach	35	S5.C.11.a.i and ii. Consider revising these sections to a table format to clarify which audiences are applicable to which messages. This will ensure even implementation of the requirements for all permittees. See the City's suggested separate document: Matrix Education and Outreach S5.C.11

	Phase I	Education and Outreach	35	S5.C.11.a.i.(b) - It is unclear why land use planners and developers need general awareness of technical standards. Consider removing planners from the audience. Also general awareness of technical standards may not make sense as a topic.
	Phase I	Education and Outreach	35	S5.C.11.a.ii - It appears that the language has changed substantially from the Preliminary Draft Language by leaving out "select from the following". As written, the Permittee would be required to create a program for each audience and each BMP. Per the Fact Sheet and October 4, 2018 phone meeting with Ecology and email from Emma Trehwitt dated 9/25/2018, this does not appear to be the intent. Revise wording to include "select one audience and one BMP".
	Phase I	Education and Outreach	35-36	S5.C.11.a.ii - Effective behavior change programs are difficult and time consuming to develop and implement. Tacoma suggests Ecology develops example programs that the permittees can choose to implement or provide grants or other funding for STORM to develop the program, or develop a free training program to assist Permittees in program development and implementation. Ecology should have at least one program for each combination of target audience and BMP available.
	Phase I	Education and Outreach	35-36	S5.C.11.a.ii(a) second bullet - Remove "Prevention of illicit discharges" from the list of BMPs, given that more detailed types of illicit discharges are already listed for behavior changes including household chemicals, carpet cleaning washwater, vehicle maintenance drips, pet waste, dumpster and trash compactor juice, etc. and there are also requirements for illicit discharge outreach under S.5.C.9.
	Phase I	Education and Outreach	36	S5.C.11.a.ii(b) - the reference to "the ongoing behavior change program (required under S5.C.10.a.ii of the 2013-2018 Permit)" is unclear. Does this mean all behavior change activities that were required under the 2013 permit or one specific audience and BMP program? Does this mean to revisit the same program that was previously evaluated in the 2013 permit? Clarify language.
	Phase I	Education and Outreach	36	S5.C.11.a.ii.(b) states ("No later than July 1., 2020..." is this a start date or completion date? Do we submit the evaluation? Or the plan? How, when and to whom? Please clarify language and requirements.
	Phase I	Education and Outreach	36	S5.C.11.a.ii.(c) - first line contains a reference to a permit section that does not exist. Correct. See comment to simplifying the structure of section S5.C.11. Note that the majority of the section falls under subsection all portions fall under "a." and that this leads to an excessive number of levels in the permit sections.
	Phase I	Education and Outreach	36	S5.C.11.a.ii.(c) - First paragraph, The "or equivalent," is located in such a way to is apply itself to "the community" instead of "Community-Based Social Marketing". Revise by moving the ,or equivalent, to after Marketing. It may be more clear to rewrite into several sentences.
	Phase I	Education and Outreach	36	S5.C.11.a.ii.(c) - The wording is such that the Permittee is required to develop a program to develop a strategy. Revise the language as follows: "(c.) Based on the evaluation of the ongoing behavior change program required in S5.C.11.a.ii.(b), each Permittee shall have completed the following activities by February 1, 2021 (see comment regarding deadline below): i) Develop a strategy and schedule to more effectively implement the existing ongoing behavior change program, OR ii) Develop a strategy and schedule to expand the existing ongoing behavior change program to a new target audience or BMP(s), OR iii) Develop a strategy and schedule for a new behavior change program which targets a new target audience and new BMP(s). The Permittee shall follow social marketing practices and methods similar to Community-Based Social Marketing that is tailored to the community. The Permittee shall develop a program evaluation plan to evaluate the effectiveness of the program updates under this section". (Include how, when and to who any products from this section would be submitted or if no submittal is required. If products are required, clearly identify those products.)
	Phase I	Education and Outreach	36	S5.C.11.a.ii.(c) - there are three sub points that are all labeled i. make each a different label S5.C.11.a.ii.(c) - Options i, ii, and iii would take a very different amount of time and effort. For example, i, i. would only require revising your existing tool for the same audience. ii. & iii. would both require new audience research to design a new tool or pick a new audience. Developing a new strategy could require 18-24 months to complete initial audience research, design and pilot a program. It would be wise to include time for a pilot or small-scale test before launching the program full-scale in order to avoid wasting money if the small-scale test reveals the strategy is not working well. Allow at least <u>one full year from the completion of the requirements of section S5.C.11.a.ii.(b)</u> for the deadline of this requirement.
	Phase I	Education and Outreach	36	S5.C.11.a.ii.(d) - "No later than April 2, 2021..." - Please clarify the timeline. Is this a start date or a completion date? Does this report get submitted for Ecology review and approval? If yes, to whom, when and how? This may not be enough time to implement based on the deadline in S5.C.11.a.ii.(c). When defining the deadline, consider if a program is seasonal, such as planting.
	Phase I	Education and Outreach	36	S5.C.11.a.ii.(d) - should the reference be to S5.C.11.a.i.(c)? The listed section does not exist.
	Phase I	Education and Outreach	36	S5.C.11.a.iii - This section seems redundant with S5.C.11.a.i.(a) - which requires general awareness of stewardship opportunities though the language and audience types are slightly different. Consolidate all stewardship requirements into one section. Clarify the intended audience. How does this section relate to S5.C.4? should those requirements be included here?
	Phase I	Monitoring and Assessment	53	S8.A.1 - Is this a single one-time payment as implied by the Permit language? Please clarify that this payment covers Aug 2019 to Aug 2020 obligations.
	Phase I	Monitoring and Assessment	53	S8.A.2 To whom is the written notification sent and how (could this be an electronic submittal using the same system as the annual report?). Does the notification require a G19 certification?
	Phase I	Monitoring and Assessment	54	S8.B.1 Add "on or" to the last sentence of this paragraph. "The payments are due on or before December 1, 2019". Please clarify that this payment covers Aug 2019 to Aug 2020 obligations.

				<p>S8.B.3 - Tacoma recommends that this paragraph be removed from the permit.</p> <p>Depending on the request, this requirement may require extreme time and effort to compile the requested information.</p> <p>However, if this requirement is retained, it must be modified. Because not responding to a request would be a permit violation, what will be the official notification method? All notifications should be directed to the Primary Contact person listed in item D. of the "Duty to Reapply-Notice of Intent for Coverage" submitted by each permittee. There needs to be an official notification method, official amount of time to prepare and deliver the information, an official way to submit and an official manner to get a receipt for submission. Clarify this is only for records required to be retained as specified under the permit not any other records that a permittee may have. Clarify the maximum number of requests that would be allowed per year and per permit cycle. Will permittees be reimbursed for their time or have their contributions to SAM lowered to account for the cost to deliver this information. Outline the format of the information delivery. Again, Tacoma recommends removing this from the permit. Tacoma supports regional data gathering efforts when possible and will continue to do so, this permit section is not required.</p>
Phase I	Monitoring and Assessment		55	
Phase I	Monitoring and Assessment		55	S8.C.1 - Option # 2 (Tacoma) submit Data and final report in accordance with the Ecology-approved QAPP. Clarify how submittal is to be made.
Phase I	Reporting Requirements		56	S9.A - The permit states, "The reporting period for the first annual report will be from January 1, 2019 through December 31, 2019." Part of the specified reporting period will be under the existing 2013 through July 2019 permit. Please provide a sample annual report for permittee comment for this first cycle. As this sample report was not included in the public comment period, please extend the public comment period or limit the annual report to the time period covered under the August 2019 permit (August 1, 2019 to December 31, 2019) or do not require an annual report for 2020. The 2013 permit did not require an annual report for the portion of the year under the previous permit.
Phase I	General Conditions		59	G3. The permit needs to clearly specify how the notification should occur. Add language to say " Call the Ecology Regional Office 24 hour number or fill out the online WQWebIDDE. The Northwest Regional office 24-hour number is (425)649-7000 and the Southwest Regional office 24 hour number is (360) 407-6300." If this information is not included, it is not possible to know the correct method for notification. It could be expected that a formal letter with G19 certification could be submitted by postmarking within 24 hours. Permittees must be able to clearly understand how to be compliant with this requirement. The online submittal should include a receipt capability.
Phase I	General Conditions		59	Clarify in the permit or fact sheet the relationship of the G3 notification to the Environmental Report Tracking System (ERTS) and when an ERTS notification is required of Permittees, if ever. Clarify if the notification under G3.B. is an ERTS notification.
Phase I	General Conditions		59	G3.C - Why is this section specific to marine waters?
Phase I	General Conditions		59	G3.D - Add the words "if appropriate" after the word "and" in this sentence. It is not always required to report to both of these authorities.
Phase I	General Conditions		61	G10. First sentence - Define storm sewer system or revise to MS4, conveyance system or another defined term. Capitalize Waters of the State.
Phase I	General Conditions		64	G19. To help facilitate Permit compliance, provide a list of all items that are required to be submitted to Ecology and how they are required to be submitted and to whom. Throughout the various Permit terms, the City has received varied messages about what portions of the Permit require formal submission. Modify the online submittal tool to allow all formal submittals to be made online. For G19.B & C - clarify if these submittal can be made electronically, modify the online submittal tool if needed.
Phase I	General Conditions		65	G20 - Add as Item 4 "4. G19 certification language".
Phase I	N/A		66	General comment for Definitions and Acronyms: Include definitions for all words and terms where definitions were requested in other comments.
Phase I	N/A		66	AKART - is 90.48.520 the correct reference?
Phase I	N/A		67	In the definition of discharge point the term "MS4 facilities/BMPs designed to infiltrate" is used. MS4 facilities/BMPs is not a defined term, consider using "Stormwater facilities regulated by the permittee" or "stormwater treatment and flow control BMPs/facilities" or define "MS4 facilities/BMPs".
Phase I	N/A		67	Ground Water should be one word similar to WAC 173-200.
Phase I	N/A		70	The definition of "Outfall" has the phrase "means point source as defined by 40 CFR 122.2 at the point where a discharge" repeated twice - please remove repeated phrase.
Phase I	N/A		72	Definition of Stormwater Treatment and Flow Control BMPs/Facilities - The word "permanent" appears to have been placed in the wrong location. As written, permanent would only apply to treatment BMPs/facilities and would not apply to detention facilities or any of the other facilities noted in the definition. Is the intent to include temporary construction detention facilities and other temporary facilities in this definition? Also rewrite to clarify that all BMPs/Facilities in this definition would help meet minimum requirement #6 or #7.
Phase I	N/A		72	The definition of SWMMWW refers to the 2019 SWMMWW but Ecology has indicated that Permittees could utilize portions of the 2014 SWMMWW and be compliant. Consider revising this definition to only include those sections of the SWMMWW as required to be changed by Appendix 10.
Phase I	Appendix 1	General		<p>Define project. It appears throughout the appendix that the terms site, project, and project site are often used interchangeably but defined differently or not defined at all. For example, Section 3.1 states that thresholds apply to projects while the definition of CESCL uses site assessment. Ensure consistency amongst intent. It is recommended to define project as it is currently defined in the July 2016 Version of the City of Tacoma Stormwater Management Manual.</p>

	Phase I	Appendix 1	General	Throughout the document, ensure that "new development" states "new development" and not just "new or redevelopment projects" because there is no definition for new projects. The correct terminology should be "new development or redevelopment projects."
	Phase I	Appendix 1	General	Consider moving Section 2 (Definitions) to the end of the Appendix to be more consistent with the permit body and general practices that put definitions at the end of a document.
	Phase I	Appendix 1	1	Define resurfacing.
	Phase I	Appendix 1	1	Define pavement preservation activities.
	Phase I	Appendix 1	1	Consider changing vegetation maintenance to maintenance of vegetation associated with the road right-of-way.
	Phase I	Appendix 1	2	Define base course.
	Phase I	Appendix 1	2	Define bituminous surface treatment and chip seal.
	Phase I	Appendix 1	2	Pervious pavement was not included under maintenance practices. Would upgrading from gravel to pervious pavement be considered a replaced or new hard surface? Consider removing: "Resurfacing by" from the third bullet to avoid confusion with the resurfacing that is exempt from the Minimum Requirements (MRs).
	Phase I	Appendix 1	3	Define lawn or landscaped areas.
	Phase I	Appendix 1	3	The term MS4 facilities/BMPs is used in the definition of discharge point. Define MS4 facilities/BMPs or used the term "stormwater treatment and flow control BMPs/Facilities" or "stormwater facilities regulated by the permittee" or another defined term.
	Phase I	Appendix 1	4	For the definition of Land disturbing activity: Define soil cover.
	Phase I	Appendix 1	5	The definition of Low Impact Development Best Management Practices includes a fairly exhaustive list of LID BMPs but at the same time leaves out items like drywells and infiltration trenches. It is recommended to include all BMPs within the SWMMWW considered to be LID or remove the list completely from the definition.
	Phase I	Appendix 1	6	For the definition of new impervious surfaces, consider adding buildings and structures to the narrative. For example: upgrading from gravel to asphalt, concrete or roofs. (Typ. For all three bullets)
	Phase I	Appendix 1	8	For the definition of Redevelopment: The definition of redevelopment is specific to sites. It is unclear how this definition would apply to projects that have work both on parcels and within the ROW.
	Phase I	Appendix 1	8	For the definitions of Replaced hard surface and Replaced impervious surface: For structures, the removal and replacement should include removal and replacement of the foundation. The use of the words "down to the foundation" is misleading.
	Phase I	Appendix 1	8	For the definition of Site: Define road projects. The definition of site does not appropriately cover the scenario where road work is completed as part of onsite work (for example, a business is required to replace a road as part of building a new building).
	Phase I	Appendix 1	8	For the definition of Threshold Discharge Area: In the urban environment, natural discharge locations no longer exist. It is recommended to remove TDA designations for the urban environment or define them differently in the urban environment - for example, they could be based upon current topography and conveyance system outfalls.
	Phase I	Appendix 1	9	The roadway examples are unclear. In the all green example, the rightmost roadway section discharge location is not connected within 1/4 mile to the upstream discharge location so it is unclear how they would be a single TDA.
	Phase I	Appendix 1	10	For the definition of Vehicular Use: further define "Infrequently used"; additionally consider changing the term and definition to "regular vehicular use".
	Phase I	Appendix 1	10	Section 3.1: Define development project; define project.
	Phase I	Appendix 1	10	Section 3.1: Define subdivision, plat, short plat, building permit, or other construction permit.
	Phase I	Appendix 1	13	The first box should ask if there is 35% or more of existing hard surface coverage to be consistent with the definition of redevelopment. Revise.
	Phase I	Appendix 1	13	Define new hard surface area; define vegetation; define lawn and landscaped areas.
	Phase I	Appendix 1	14	Define pasture.
	Phase I	Appendix 1	14	It is unclear if All Minimum Requirements apply to the converted vegetation areas if the converted areas do not meet the thresholds as outlined in the flow chart. Add additional language to both the chart and the project thresholds sections for clarity.
	Phase I	Appendix 1	15	Section 3.3: It is stated that the Minimum Requirements can be met for an equivalent area. Does this section only apply to redevelopment projects? Why is the area limited to the same site for areas that have parcels but the scope is wider for public road projects? Define public road projects.
	Phase I	Appendix 1	15	Section 3.3: project limits was replaced with same site - define site
	Phase I	Appendix 1	15	Section 3.4: Define road-related projects.
	Phase I	Appendix 1	16	Section 3.4: Why are only redevelopment project limited to being able to meet their obligations through the use of a regional facility? The water quality impacts are similar. Consider revising to allow the use of regional facilities for all types of development.
	Phase I	Appendix 1	16	Section 4.1 - The wording should say "all projects meeting the thresholds in Section 3 of this Appendix." The thresholds are located throughout Section 3.
	Phase I	Appendix 1	17	Section 4.2 - The second paragraph under General Requirements - it is unclear what this section is requiring. Is this section specific to platting? Define developments, define site development plan.
	Phase I	Appendix 1	17	Section 4.2 - The seasonal work limitations are a confusing section because the items that apply to the seasonal limits apply throughout the year and are part of any SWPPP. Consider removing this section or revising to state something about extra care during wet season.
	Phase I	Appendix 1	18	Section 4.2 - Element #3 - Define development sites.
	Phase I	Appendix 1	19	Section 4.2 - Element #4.e - The way this is written makes it sounds like it is preferred or required to direct dirty stormwater to the natural buffers. Is that the intent?
	Phase I	Appendix 1	20	Section 4.2 - Element #6. WWHM does not have a "landscaped" category. Consider changing to lawn.

	Phase I	Appendix 1	21	Section 4.2 - Element #8. It is unclear if the intent is to ensure that temporary conveyance channels can fully contain the flowrates from the 10-year storm events. Include additional language. Additionally, WWHM does not have a "landscaped" category. Consider changing to lawn.
	Phase I	Appendix 1	22	Section 4.2 - Element #9.d - Consider revising as follows for clarity: "Discharge wheel wash or tire bath wastewater to the sanitary system (with local sewer district approval) or to a separate onsite treatment system that does not allow discharge to the MS4 or Waters of the State."
	Phase I	Appendix 1	22	Section 4.2 - Element #9.e - Application of fertilizers and pesticides is not typically part of site construction and may not be appropriate for this section.
	Phase I	Appendix 1	22	Section 4.2 - Element #9.h the last sentence states - Do not wash out to formed areas awaiting infiltration BMPs. The use of the word: "formed" implies areas with concrete forms - see the third sentence of this section. It may be better to use the word "graded" or "contoured" to clarify that this would apply to any area that is wholly or partially shaped to accommodate an infiltration BMP.
	Phase I	Appendix 1	22	Section 4.2: Element #10a. - This statement appears to imply that a sediment trap or sediment pond is required for all projects that have dewatering. A sediment trap/pond is not the best BMP option for all project types. Consider revising statement.
	Phase I	Appendix 1	22	Section 4.2: Element #10b. This statement appears to say that dewatering water should not go through any sediment BMP, a. on the other hand appears to state that dewatering water must go through to a sediment trap. Revise language to avoid confusion. Change "surface waters of the state" to "waters of the state" or define surface waters of the state.
	Phase I	Appendix 1	24	Section 4.4 - Define natural drainage patterns. In the ultra-urban environment, the natural drainage patterns have long been changed due to development and installation of conveyance systems. How this MR applies is not clear for the urban environment? Consider creating additional language as to the intent in the urban environment.
	Phase I	Appendix 1	24	Section 4.5 - Define stormwater management BMPs or use a defined term.
	Phase I	Appendix 1	25	Appendix 1 now requires the use of BMP T5.13 when utilizing the option of LID Performance Standard. Is this BMP required to be used even when not feasible? Should the language be updated to state, when feasible? Also, modeling allows BMP T5.13 to be used to help meet the flow control requirement - if it is also required, can it be used in the modeling as well?
	Phase I	Appendix 1	27	Section 4.5: The List Approach - It is stated, "For each surface, evaluate the feasibility of the BMPs in the order listed, and use the first BMP that is considered feasible. No other BMP from the list is necessary for that surface. If all BMPs in the list are infeasible, then the designer must document the site conditions and infeasibility criteria used to deem the BMP infeasible." The way this is written, it would not be required to demonstrate infeasibility of something further up on the list if something lower on the list was chosen. This is not likely the intent, consider rewriting this section to require infeasibility documentation for any BMP that is deemed infeasible even if "all BMPs in the list infeasible".
	Phase I	Appendix 1	28	It appears that the for Flow Control Exempt Projects there is now a required order for which BMPs to utilize. Is this the intent? Provide reason for this change in the Fact Sheet.
	Phase I	Appendix 1	30	Section 4.6: Oil Control - The first bullet would require oil control for smaller buildings and would not require oil control for larger buildings. For example, under this, a drive-through coffee stand would require oil control but a Walmart typically would not. Consider revising this bullet to capture the need for lots that are spatially large and have high turnover and large buildings to require treatment and provide exemptions for smaller establishments.
	Phase I	Appendix 1	31	Section 4.6: Enhanced Treatment - Define designated for aquatic life use or that have an existing aquatic life use; industrial project sites; commercial project sites; & multifamily residential project sites.
	Phase I	Appendix 1	32	Section 4.6.4 - The second sentence appears to state that basic treatment is only required for infiltration or discharges to surface but not discharges to the MS4. Verify intent and revise.
	Phase I	Appendix 1	32	There is a problem when determining if basic or enhanced is required. The words say 50% or more of the TDA requires: the basic treatment section says 50% or more and the enhanced treatment section says 50% or more so it is unclear when one would apply if 50%.
	Phase I	Appendix 1	34	Section 4.7: TDA Exemption - It appears that Salt Waterbodies were added to the Flow Control Exempt Waterbodies List and now additional hydraulic analyses of the stormwater conveyance system are required. It is unclear why Ecology is considering regulating conveyance system design. Remove the hydraulic capacity requirement from this section to ensure Ecology is not regulating conveyance system capacity design.
	Phase I	Appendix 1	34	Section 4.7: TDA Exemption - Define sufficient hydraulic capacity for the conveyance system.
	Phase I	Appendix 1	39	Section 7: Basin Plans: "Basin Plans may also be used to demonstrate an equivalent level of...regional stormwater facilities." The inclusion of this language is unclear and could be construed to mean that jurisdictions are required to have a reviewed and approved basin plan in order to utilize regional treatment facilities. Consider removing this sentence.
	Phase I	Appendix 3	General	An electronic version of the annual report should be available for permittees to be able to see the requirements for each response during the public comment period.
	Phase I	Appendix 3	General	Ecology must outline the requirements for submittals in the electronic submittal form. Size of attachments and number of attachments for each answer should be provided. Alternate submittal mechanisms should be outlined if submittals can not meet the requirements.
	Phase I	Appendix 3	General	The questions should be in order by permit section. The electronic form should be in the same order as Appendix 3.
	Phase I	Appendix 3	1	Q. 5.a - Why is it necessary for Permittees to submit a spreadsheet of outfall data? This information is contained within the Permittees mapping data and available upon request. Will Ecology be utilizing this data? Would a shape file be more helpful? Would each year's list be distinct or would it duplicate the pervious years information and add additional?
	Phase I	Appendix 3	1	Q.8 should be eliminated. It is overly duplicative with Q.9. The permit states to update the agreement if needed and to submit information in the Annual Report due no later than March 31, 2020. Q.9.a is in conflict with permit section 55.C.3.a - which does not state to submit only updates, that permit section states "Permittees shall include a written description of internal coordination mechanisms in the Annual Report, due no later than March 31, 2020." This does not say "updated". Rework these questions to match the permit requirements or revise the permit requirements to match the questions. Some or all of this information may be more appropriate to be included in the SWMP.
	Phase I	Appendix 3	2	Q. 12 - This information is already part of the SWMP. Remove this question.

	Phase I	Appendix 3	2	Q. 14 and Q. 15 are referencing the incorrect Permit section. Revise.
	Phase I	Appendix 3	2	Q. 16 & Q. 17 - Is Q. 16 and Q. 17 meant to be the total number of adjustments and exceptions with 16a and 17a just meant to show the number of adjustments/exceptions made only to MR#5? or will the answer to 16 and 17 include the totals from 16a and 17a and others? Additionally, MR #5 contains infeasibility criteria - it is not likely that an applicant will require an adjustment or exception request to a Minimum Requirement - they will likely use the infeasibility criteria to not utilize a given BMP. It is unclear why Ecology is interested only in the number of adjustments/exceptions granted to MR#5. How will this information be used by Ecology?
	Phase I	Appendix 3	2	Q. 25 - Because the NOI is now an electronic document it is unclear how this requirement is intended to be met and why it is necessary to report on this in the annual report.
	Phase I	Appendix 3	2	Q. 26 - Reword to be parallel with other training questions: "Implement ongoing training program for...."
	Phase I	Appendix 3	3	Q.27 This provision of S5.C.6 does not give a deadline and so it is unclear when this question will be answered for evaluating permit compliance. Clarify deadline or remove this question.
	Phase I	Appendix 3	3	Q. 28 - The permit section (S5.C.6.a.i) states two different things: that the Permittee shall describe in the Annual Report how they are meeting this requirement and that they must submit reports on specific dates. The Permit language never states that this Report must be submitted to Ecology. Clarify language within the Permit and describe how this report will be used by Ecology (why it needs to be submitted to Ecology). Update the permit section and annual report questions to be consistent. Revise the reporting date to March 31, 2022.
	Phase I	Appendix 3	3	Q. 29 - The Permit language states that Permittees must create a report for this requirement. If a separate report is being created it is unclear why the Permittee also has to attach a separate summary document. Again, consider which documents should be included in the SWMP or as Attachments to the SWMP and which documents should be part of the annual report. Also, this question specifically requests a description of the review process. The process is likely to be the same each year. Clarify the information that Ecology is requesting, ensure that it aligns with the permit section requirements and clarify how the reporting in S5.C.7.b.i.(a) is to occur?
	Phase I	Appendix 3	3	Q.32 Revise this question to add "for the purpose of meeting S5.C.7.d" after ...permit term..."
	Phase I	Appendix 3	3	Q.34 - revise this question and the permit language from "at least once every 5 years" to "once within a permit term". The start point for the 5 years is unclear.
	Phase I	Appendix 3	3	Q. 35 - This item is more appropriate for the SWMP than the annual report.

				<p>Q36 - "Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken."</p> <p>There are various components to this annual report question.</p> <p>1 Reporting out on the number of inspections done by business category will only show that Source Control efforts tend to focus on food service establishments, automotive detailing/repair shops and private-residential stormwater device maintenance.</p> <p>2 What is meant by noting the amount of time each business was inspected? Should this be the "number of times" ? How does this information indicate permit compliance?</p> <p>3. Enforcement philosophies vary across jurisdictions so the number of enforcement actions taken by jurisdiction should not be considered comparable data. Different programs will compel compliance in different ways.</p> <p>4. Sorting enforcement actions by business type is an irrelevant exercise. Business type does not drive enforcement – personality type of the responsible party, or the Source Control staff, drives enforcement.</p> <p>5. Retooling an existing database to sort data for this annual reporting requirement will not produce any newly useful information and is overly burdensome to Permittees. This type of organization by business category will take significant reworking of Tacoma's database to generate data in this form. For this type of reporting, there should be a minimum one year ramp up period. In addition, the permit section does not require tracking by business category. It appears that the annual report question is attempting to establish a requirement that is not in the permit. Remove the requirement to organize by business category.</p>
Phase I	Appendix 3		3	Please delete this reporting requirement or use the question from the 2013 permit.
Phase I	Appendix 3		4	Q. 38. The wording of this question makes a response difficult. Please reword. Suggested language - "Were updates to regulatory requirements needed to effectively prohibit illicit discharges into the MS4 per S5.C.9.b." and Q38a. "Provide date when updates were adopted and cite code reference in the Comments field". Alternatively this could be rewritten in a form similar to AR Q.52.
Phase I	Appendix 3		4	Q. 39a. This information is more appropriate in the SWMP than in the annual report.
Phase I	Appendix 3		4	Q. 40 - The wrong Permit reference is shown. This should reference S5.C.9.c.i.(a). Additionally, the permit section reads, "Each Permittee shall implement an ongoing field screening program of, on average...." this question should reflect the permit language and requirement. However the permit requirement is unclear. See comments on S5.C.9.c.i.(a).
Phase I	Appendix 3		4	Q. 40a. This information is more appropriate in the SWMP than in the annual report. If it remains an annual report question, rewrite to state: "Describe techniques used to determine percent of the known conveyance system." As written, the permit question is unclear.
Phase I	Appendix 3		4	Q. 41 Add the permit section that this question relates to. (S5.C.9.c.i(a)?) Also clarify the request and permit language. Would this be unique sections of the MS4 or if the section was reinvestigated during the permit term would that be counted twice? If a section was visually inspected and then also inspected via downstream outfall monitoring would it be counted once or twice? This could add a large workload to our current procedures for calculating this information.
Phase I	Appendix 3		4	Why is this information important and how will it be used? Clarify the annual report question and the permit section.
Phase I	Appendix 3		4	Q.40, Q40a. and 41 and permit Section S5.C.9.c.i.(a) need to use consistent language. The term here should be "known conveyance system". It is unclear what Ecology's intent is with using the different terms.
Phase I	Appendix 3		4	Q. 42 - This is more appropriate in the SWMP than in the annual report. If this remains in the annual report, what is the form of this question? Will it be an attachment? Clarify.
Phase I	Appendix 3		4	Q. 45 - Reword question to request the number of illicit discharges "identified" since follow up will be described in the answer for Q. 46. Not every illicit discharge has record of being eliminated. "Eliminated" is more appropriate when addressing illicit connections only. The Permit section states to eliminate illicit connections. This questions should be directly related to one or more of the compliance measures outlined in S5C.9.d.iv.
Phase I	Appendix 3		4	Q.46 - The last sentence has the phrase "all of the applicable information", please clarify this meaning. The online form will accept blanks. Additionally, the current version of the online form contains repeated fields and other fields and errors that are not clear on how to use. See comments on the form. It will not be possible to accurately submit this information with the current information provided by Ecology.
Phase I	Appendix 3		4	Q. 47 - Reword to be parallel with other training questions: "Implement ongoing training program for...."
Phase I	Appendix 3		4	Q. 49 - Align date with permit July 1, 2021
Phase I	Operations and Maintenance		29	Q.51a. This section states to attach documentation of any maintenance delays. This is not required per Section S5.C.10.a - which specifically states documenting circumstances beyond the Permittee's control. Revise the Annual Report question to align with the Permit section: "Attach documentation of maintenance timeframe exceedances that were beyond the Permittee's control".
Phase I	Appendix 3		5	Q. 56. The compliance metric in S.5.C.10.b.iv is achieving inspection of 80% of all sites. The inspection requirement of b.ii and b.iii are inspection of <u>facilities and catch basins</u> with no relation to the <u>sites</u> . Revise language within the Permit and this question to ensure the compliance goals match the requirements.
Phase I	Appendix 3		5	Q. 57. Use consistent terminology between annual report question and Permit. The Permit states to inspect all stormwater treatment and flow control facilities <u>owned or operated by the Permittee</u> while the annual report question states <u>municipally owned or operated</u> stormwater treatment and flow control BMPs/facilities.
Phase I	Appendix 3		5	Please use consistent language and defined terms.

				<p>Q. 61. Separate these questions as they are separate and distinct. As worded, it does not appear that these questions can be answered. Remove inlets from this question.</p> <p>Q.61.d - This information would be better included in the SWMP Plan than the annual report.</p> <p>Make sure wording is consistent with the associated permit sections.</p>
Phase I	Appendix 3		5	
Phase I	Appendix 3		6	Q.66. This would be more appropriate to include in the SWMP Plan than the annual report.
Phase I	Appendix 3		6	Q.69. This would be more appropriate the report in the SWMP Plan than in the annual report. Consider revising to ask if report is included in the SWMP Plan.
Phase I	Appendix 3		6	Q.70a. This would be more appropriate to include the list of stewardship opportunities in the SWMP Plan than the annual report. Include both activities created and advertised.
Phase I	Appendix 3		7	Q.86. There is no information about how this notification is to be made. Please add notification procedure to Section G3.
Phase I	Appendix 3		7	Q.90. - It is unclear how to answer this question if the Permittee had no G20 notifications during that reporting year. Revise to state: "Did the Permittee fail to comply with the permit terms and conditions within the reporting year?" and add "90a. Did the Permittee notify Ecology within 30 days of becoming aware of non-compliance?"
Phase I	Appendix 3	General		<p>There are several instances in the Annual Report questions where Ecology is requesting reports or information that is not shown in the Permit language itself. The Annual Report should not add requirements that are not within the permit itself.</p> <p>It is unclear why Ecology asks for some documents but not others. Specifically state when items need approval before implementation. Now, it is somewhat arbitrary what documents Ecology will request to be submitted and what documents require review and approval. The signatory process for local jurisdictions can be lengthy so knowing ahead of time which documents need review and approval is paramount to an efficient program. It is likely the most appropriate to just require all documentation within the SWMP Plan itself and not require documentation with the annual report questions.</p>
Phase I	Appendix 3	General		<p>There are several instances throughout the Permit that require obtaining new and different information in order to answer the questions in the Annual Report. The Annual Report should not add requirements that are not within the permit itself.</p> <p>Any section that requires the Permittee to start recording new information should include a ramp up period of at least one year to allow Permittees to update existing databases, processes, and procedures - and allow time to train staff on any new information needs. For example, Q. 36 and the IDDE Schema require documenting new information but there is no ramp up period for implementation.</p>
Phase I	Appendix 6		1	Define Street Waste Liquids
Phase I	Appendix 6		1	Option 2 specifies decant liquid only from catch basins and wetvaults. What about decant liquid from other facility types?
Phase I	Appendix 7		1	Define development site.
Phase I	Appendix 7		1	Define anthropogenic barriers. It is unclear if a plan reviewer would have sufficient resources and to determine if a stream could have been Salmonid bearing. Can Ecology provide resources for this determination?
Phase I	Appendix 7		1	Define Marine near-shore habitat. Would this encompass every marine waterbody discharge?
Phase I	Appendix 8		1	The Permit section reference is incorrect.
Phase I	Appendix 9		3	Qualifying Storm Event Criteria: Antecedent dry period during wet season: 6 hour antecedent dry period (<0.05" rain) does not allow some sites to return to baseflow conditions. Sampling with this short antecedent could result in capturing flows from the previous event in a storm. It is unclear how events would be separated without a true 6 hour inter-event dry period following a storm.
Phase I	Appendix 9		4	Flow Weighted Composite Sample. City of Tacoma has one outfall location that is a time composited site. It has been approved by Ecology for the NPDES Outfall monitoring. Please add: Ecology may approve time composite sample if the Permittee provides evidence demonstrating that a time composite sample is representative for a specific location.
Phase I	Appendix 9		4	Parameters: Flow Weighted Composite Samples: Add that Ecology may approve a different priority order for some locations – "or as otherwise approved by Ecology". For example, the City of Tacoma sampling also meets the needs of the EPA stormwater monitoring required as part of the Superfund cleanup of the Thea Foss Waterway. A different priority order for parameters has been established to best meet the requirements of these two monitoring programs.
Phase I	Appendix 9		4	Parameters: Flow Weighted Composite Samples: Add that some parameters may be dropped from the analysis based on past sampling performance under the 2013-2018 Permit.
Phase I	Appendix 9		5	Parameters: Stormwater Solids Samples: Add that Ecology may approve a different priority order for some locations – "or as otherwise approved by Ecology". For example, the City of Tacoma sampling also meets the needs of the EPA stormwater monitoring required as part of the Superfund cleanup of the Thea Foss Waterway. A different priority order for parameters has been established to best meet the requirements of these two monitoring programs.
Phase I	Appendix 9		5	Parameters: Stormwater Solids Samples: Remove "shall" from collection of additional sample if insufficient sample exists. Based upon the City's experience, there are issues with collecting sufficient sample volumes currently in our annual stormwater solids monitoring (once per year) to complete all of the parameters on the list. Collection of additional samples to run all of the organic parameters would be non- representative of a "yearly" accumulated sediment sample. Use of the sample would be limited to absence/presence and could not be included in Statistical analysis of the annual data. Installation of an additional sampling apparatus at the monitoring location to collect the additional sample would create an obstruction in the pipes and disrupt the collection of the current annual sample.

	Phase I	Appendix 9	5	Parameters: Stormwater Solids Samples: Add that some parameters may be dropped from the analysis based on past sampling performance under the 2013-2018 Permit.
	Phase I	Appendix 9	5	Recordkeeping and Reporting: Add statement that the first annual report will include data for the complete water year if the sampling program is continued from the past sampling performance under the 2013-2018 Permit.
	Phase I	Appendix 9	6	Recordkeeping and Reporting: Annual Monitoring Report. 4th bullet under Description of Stormwater solids sampling event: Says "Whether after 4 sampling events, a more sensitive analytical method was needed to detect PCBs." This should be clarified to take into account the possibility that Ecology may have approved sampling once per year instead of twice per year as allowed under Types of Sampling. It is unclear whether the more sensitive analytical method would be discussed after two years of sampling (i.e. 4 total samples if sampling twice per year) or after four years of sampling if sampling once per year.
	Phase I	Appendix 9	Table A9-2	The list of parameters in Table A9-2 requires at least 8 liters of stormwater to be collected for each storm event. With Tacoma's current S8 monitoring program, we were able to collect enough sample volume for all parameters only 70-80% of the time (a minimum of 5 Liters for all parameters and 1 liter for Lab QA). Due to typical available sample volume, it is unlikely that the newly added parameter of PSD will be analyzed for very often. Please support the prioritization of parameters based on the available sample volume.
	Phase I	Appendix 9	Table A9-2	Particle size distribution – is this being added? Note that per the method included in Wet Sieving and Laser Diffraction Measurement Procedures, two liters of sample are required. Based on the City's experience, there are currently issues collecting enough volume for the current list of parameters; therefore it is unlikely that this analysis could ever be run based on the priority list.
	Phase I	Appendix 9	Table A9-2	Footnote C indicates that Ecology recommends modifying the method to analyze (filter) the entire field sample. Note that it will always be a subsample if you are analyzing for any other parameters.
	Phase I	Appendix 9	Table A9-2	EPA Method 200.8 SIM is superfluous/odd. SIM should be removed from the metals method.
	Phase I	Appendix 9	Table A9-2	Metals should be revised to remove the word "recoverable" as it is not applicable.
	Phase I	Appendix 9	Table A9-3	In this table, there is no reference for footnote "a". The text currently referenced in footnote "a" is applicable to footnote "b", all others are also off by one letter.
	Phase I	Appendix 9	Table A9-3	Footnote E says "...first 2 samples...". Similar to the comment on the Annual Monitoring Report above, please clarify whether method change would come after two samples, four samples, or if this is dependent on the number of samples taken per year.
	Phase I	Appendix 9	Table A9-3	With regard to methods for PCBs, note that no one in Washington is accredited to perform Method 1668C. Samples would have to be sent to a lab in Surrey, BC or California for this analysis. Costs for this congener analysis would be approximately \$600 per sample. The Permit requires 5 samples at twice per year at a total cost of \$6,000 per year. There may also be Customs issues with using the Canadian lab.
	Phase I	Appendix 10	3	Under Part 2, the language references the Phase II Permit. Revise language.
	Phase I	Appendix 10	6	What is considered to be a new section not found in the SWMMWW?
	Phase I	Appendix 10	NA	Will Ecology just be approving the changes as equivalent or entire new manuals as equivalent. The City of Tacoma is intending to change language throughout their SWMM for clarity, etc. based upon feedback during implementation. How this is accomplished while maintaining an equivalent manual is unclear from this appendix. Entire manual equivalency is necessary because grant funding is based upon the use of the SWMMWW or equivalent manual and when jurisdictions make changes to their SWMM that Ecology will not approve; their usable manuals are no longer deemed equivalent. It is recommended that Ecology not approve manuals as equivalent or that there is a process that easily allows jurisdictions to update their manuals when need be based upon feedback from the development community and plan review staff. The City would like Ecology to approve the entire document as equivalent or not approve the manuals at all.
	Phase I	Appendix 10	NA	It is unclear if Ecology is only reviewing portions of the SWMMWW, how those sections within the Permit that require compliance with BMPs within the SWMMWW or equivalent will be verified without reviewing each jurisdiction's SWMM. See comment above, either review each manual in its entirety for equivalency or do not provide review.
	Phase I	Appendix 10	4	Under the 2013-2018 and 2012 Permit, it appears that Element 9f should state Element 9g, Element 9h should state 9j, and 9i should state 9j. Verify and revise.
	Phase I	Appendix 10	5	The language suggested to replace Section 4.7, Second Paragraph is not the same language as shown in the Permit Section. Revise.
	Phase I	Appendix 10	5	It does not appear that applicant are required to revise their SWMM to comply with the new wetlands protection guidance though it is specifically referenced in the Permit and SWMMWW. Is this the intent?
	Phase I	Appendix 12	1	The project types do not match that shown in the Permit. Ensure consistency. The facility types 1-5 should be: new flow control BMP, new runoff treatment BMP, new LID BMP, Retrofit of existing flow control BMP, runoff treatment BMP, or LID BMP.
	Phase I	Appendix 12	1	Include columns for each item needed in the equivalent area calculations, including full basin area, required area, actual area, and benefit ratio.
	Phase I	Appendix 12	2	The Project Achievement Descriptions do not match the words provided in the SSC Guidance. Ensure consistency amongst documents.

				<p>Overall the IDDE reporting requirements if implemented fully without some flexibility to our jurisdiction's current database configuration would generate a significant workload to satisfy the requirements. Not only will the cost and time commitment to implement these changes be burdensome but based upon our 16 years' of experience using a similar lengthy form, that it is the wrong way to go. The proposed schema forms has too many fields/domains and those fields will ultimately not be filled out accurately/consistently and thus the information obtained from the region will be inconsistent and make finding any meaningful trends difficult. Additionally, Tacoma has been monitoring the types of spill material/source etc. since the early 2000's (see attachment Thea Foss Complaints and Spills 2002-2017) and the data we are collecting is not new or ground breaking and will not really help to steer the future of source control in the Puget Sound Region. In Tacoma, we have recently been working to streamline the spill/complaint form and create a more user friendly platform that is compatible with the modern way of doing business on a tablet or smart phone wirelessly in the field. This will allow responders to fully document the spill/complaint in the field with a map based application in a timely manner and move on to the next incident or business/asset inspection. With the proposed IDDE Reporting requirements it will be extremely difficult to accomplish our goal of making a field responder application that will allow staff to be more efficient in documenting these incidents and moving on to the next source control activity.</p>
Phase I	Appendix 14 (PH I)		NA	
				<p>Ecology shared at the October 24, 2018 meeting that the proposed permit language was largely driven by the Illicit Discharge Detection and Elimination (IDDE) Regional Data Evaluation for Western Washington, report dated March 31, 2017. As stated in Section 5.2 of the evaluation, "The results of this data evaluation support the development of a regional IDDE database that can be used to compare pollution reduction and response among jurisdictions and across the Western Washington region." Though the results of the evaluation may support an IDDE database, the results by no means appear to show that a single database is necessary in order to compare data only that it would make data comparison quicker and easier. The Permit does not specifically require Permittees to compare data in order to direct their activities nor should it. Though SWMPs may have some elements that can be regionally based, it is not guaranteed that regional programs will ensure compliance with elements of the Permit IDDE program.</p> <p>It was also stated by Ecology in the meeting, that the 2014 data was not sufficient and only anecdotal in nature. The 2017 IDDE Report does not reflect Ecology's stated sentiment. The report shows that, though potentially time consuming, data was comparable and results were able to be derived. The results of this data comparison appear to show that amongst jurisdictions there is not a clear understanding of what was requested in the Annual Report Questions (as shown by the variability in the number of illicit discharges and connections reported and the information reported). This could be fixed by creating clear requirements for the annual report questions and more clearly defining terms in the Permit to ensure consistency amongst Permittee's interpretation of Permit requirements.</p> <p>The 2017 IDDE Report results also appear to show that amongst jurisdictions, spills caused by automotive and construction site runoff account for a high number of incidents. Because there are already comparable results it is unclear why Ecology is requiring Permittees to submit additional information and it is unclear how exactly this information will be used. In Section 5.2, the 2017 IDDE Report goes on to state that the data obtained from the report can be used to answer many questions. The report never seems to indicate that information already submitted by Permittees is not usable because it is not in a common format. The logic that the evaluation was used to inform the Permit language of requiring Permittees to utilize a standardized form does not appear to be valid as information needed to answer specific questions can already be gleaned from the data submitted. Additionally, it is unclear how Ecology will fund the development of and continued maintenance of the database and analyses of the data. The funds provided by Permittees under Section S8.B.2 are not guaranteed to fund the WQWebIDDE form and analysis of the data. The City of Tacoma recommends Ecology remove the proposed language in S5.C.9 that requires Permittees to include all information specified in Appendix 14.</p>
Phase I	Appendix 14 (PH I)		NA	
				<p>The City of Tacoma has spent 20 years developing a program to track spills and complaints. This program tracks many of the same components as will be required with the new schema. It has been our experience that there is a significant and exponential drop in data quality and consistency when field choices extend beyond 7-10 options. This is further supported by the fact that in the IDDE Regional Evaluation for Western Washington, March 31, 2017 53 discrete pollutants were grouped into 8 categories for the purposes of data management.</p>
Phase I	Appendix 14 (PH I)		NA	
				<p>The list of information requested by Ecology has many choices that duplicate or overlap and many that are too specific in nature. Options also negate one another and may cause confusion on how to report properly. The City of Tacoma requests that a value added exercise (such as LEAN or Six Sigma) be performed for all fields provided to ensure the inclusion of the information is useful.</p>
Phase I	Appendix 14 (PH I)		NA	
				<p>Currently, the Permit would require Permittees to start collecting this data immediately in order to report the information for the March 2020 Annual Report. The City believes a ramp up period of at least <u>one year</u> is crucial to update our current database system and train staff. It is estimated that 1-3 FTEs will be required to update the current database and train staff.</p>
Phase I	Appendix 14 (PH I)		NA	

	Phase I	Appendix 14 (PH I)	NA	Provide an example .xml download file for review. This will be needed to modify existing databases. However, a space, comma, or tab delimited spreadsheet or .csv is the preferred option for data sharing. Please consider allowing information to be provided in this type of format.
	Phase I	Appendix 14 (PH I)	NA	Provide the .XSD explanation document.
	Phase I	Appendix 14 (PH I)	NA	In the October 24, 2018 meeting with Ecology, it was requested that Permittees comment on what is a possible deliverable for the March 2020 Annual Report. The City of Tacoma can provide an excel spreadsheet of the information that is being input into our current database. The City of Tacoma will not be able to start capturing all the information provided in the Draft Permit Language immediately as the effort to start modify our database, input and track this data is significant. Once the final Permit language is known, the City will start the process of updating the current database and training. It is anticipated that without a ramp-up period of at least <u>one year</u> , the City will have to issue a G20 for their first annual report because it will not be possible to start tracking all the information currently requested. Until the permit language is in a final form, it is not recommended to begin the process of database modification, training staff, collecting and tracking data in the new format as the draft may be modified in the final permit language and such a significant effort can not be repeated.
	Phase I	Appendix 14 (PH I)	NA	A data dictionary is needed for every term in Appendix 14. This will not only help in better consistency from jurisdiction to jurisdiction, but also help those agencies who are already collecting data cross walk the information from one format to another. Again, please consider significantly simplifying the proposed data request.
	Phase I	Appendix 14 (PH I)	NA	Changes were made to Appendix 14 during the comment period. The comment period should have been extended to reflect these changes. The comment period was not extended.
	Phase I	Appendix 14 (PH I)	NA	It was mentioned at the October 24, 2018 meeting that in the 2017 analysis of the 2014 annual report data there was concern over how many "unknown/other" category complaints there were and that was a major contributing factor in developing the new lengthy over detailed database/schema requirement to get "better data" to inform legislators. With the City of Tacoma Source Control Staff contributing 60% of the data that was analyzed for this report it is important to understand why so many were marked unknown/other before requiring a highly impactful change to the permit based off that data. It's not a matter of being unable to determine what was spilled as it is consistency among users and quality control over the entry of the data into the individual fields. During 2014, the use of unknown/other can be attributed to inconsistent data entry among staff as well as the fact that the database defaults to "unknown/other." If staff started an entry and then noted in a text field that no actual issue was found, there are many instances where those individuals would not go through and completely fill out the 15-20 fields/boxes that are normally required when we have a confirmed incident. Additionally it is important to note that "unknown/other" are two distinctly different categories that should not be considered singly. Staff may have used this field to depict an issue as "other" when one of the options in the drop down did not match what they found, or staff may have used it to depict "unknown" when the material type was unable to be determined. This field was most commonly used when a source/material was never found and the field was left in its defaulted state. A large portion of "unknown/other" complaints is largely made up of "No issue Found" which technically should not have been reported as IDDE (or used in this report to drive future permit language). Another portion of the unknown/knowns is made up of failure to mark the correct category. A small portion of "unknown/other" were sites where the material was unable to be determined or the issue was unclear. Adding more fields to a form will not get better data to draw any new conclusions or drive any new source control measures.
	Phase I	Appendix 14 (PH I)	NA	Because much of the same information is reported in ERTS, it is unclear why this information is requested in this format as well. Describe.
	Phase I	Appendix 14 (PH I)	NA	Please see the attached markup "Appendix14 - Comment Memo Attachment" for specific comments related to the WQWebIDDE and Appendix 14.
	Phase I	Appendix 14 (PH I)		It is unclear as to the ramifications if the data entered is not accurate - as many answers are based upon assumptions because field staff do not conduct lab analysis of each spill. Additionally, street address should not be included, often spills are in the right-of-way, if street address is used, the private property owner associated with that address may be unfairly associated with a discharge that had nothing to do with their activities such as a car accident.
	Phase I	Appendix 14 (PH I)		Overall it is unclear exactly what information is required to be submitted. The .xsd document provided does not include enough information to be usable. There is inconsistent information given between IDDE XML Schema Document (IDDE.xsd), the printed version of the webapp and the online test version of the webapp. Because submittal is a required activity, Ecology must provide clear information to all permittees.

				Per Ecology request during Nov 6 Webinar - provide what you currently collect. Please see the attached document "process improvement draft IDDE.docx". The City has attached a screen shot of our existing IDDE collection screen. Please note however, that the City is in process of a process improvement to change this form. the plan is to simplify the form much further. The simplification is based on our analysis of year's of data. We looked at the fields that were being used and the information that could be helpful and we are simplifying the form. The information on the simplification project is also included in the attached document. Based on the City's IDDE work and data analysis, the simpler the reporting form and fields are, the better the data will be. Ecology's proposal would greatly increase the complexity of recording and reporting. there would be many blanks in the proposed form and the data would be entered in inconsistent ways. Revise the proposed data request to simplify.
Phase I	Appendix 14 (PH I)			
Phase I	IDDE	Ecology prepared "Focus on WQWebIDDE"		Ecology prepared "Focus on WQWebIDDE" has a section entitled "how will this information be used?". It is unclear how the information gathered will be able to answer the specific questions noted because of the lack of clarity about how to fill out the form and how many of the data fields require input. Also, based upon the huge effort it will take to modify the City's database, fill out this data for each event, Tacoma does not agree that the work is worth the potential ability to analyze data. We currently know enough to inform the types of outreach that would be helpful both on a regional and City scale. Remove the requirement to track all the required information from the Permit.
Phase I	IDDE	Ecology prepared "Focus on WQWebIDDE"		Ecology prepared "Focus on WQWebIDDE" has a section entitled "Are all of the fields required?" and that section states "Permittee's must include all of the information specified in the form for their annual report submittal". 1) if this is an actual requirement, this needs to be noted in the permit (Section S5.C.9.g). 2)Based upon extensive review of the required fields, it does not seem possible to comply with this sentence. The way the form and app are designed, it appears that you only check a box if it is applicable, additionally, there is so much repetition in the fields that it is completely unclear if for a specific incident if a user should check one or multiple entries.
Phase I	IDDE	Ecology prepared "Focus on WQWebIDDE"		Ecology prepared "Focus on WQWebIDDE" has a section entitled "How does WQWebIDDE relate to ERTS?" and that section states "...G3 only requires permittees to notify ecology that an incident is occurring: the permit does not require further entries into ERTS." This statement seems to imply that Permittees would be required to input information into the required form more than once. This is not stated clearly in the permit. The permit must clearly outline the exact requirements of the Permittee.
SSC Guidance	N/A		1	It is stated, "Qualifying projects reduce or prevent negative water quality impacts from MS4s." Consider revising to state "Qualifying projects should aim to reduce or prevent negative water quality impacts to receiving waterbodies from MS4s." This addition of receiving waterbodies defines the goals better.
SSC Guidance	N/A		1	It is stated, "Ecology does not intend SSC projects to mitigate or compensate for previous impacts from MS4s." This statement is confusing as some of the qualifying project types such as maintenance, restoration, and floodplain connection directly compensate for previous impacts from the MS4." Remove statement or provide additional language as to the intent of this statement.
SSC Guidance	N/A		1	"Ecology intends...the defined level of effort to achieve...the goal of allowing comparison of runoff treatment and hydrologic benefits." It appears that the program is normalizing or standardizing benefits, not comparing benefits. Consider revising language.
SSC Guidance	N/A		1	"Ecology intends...the defined level of effort...to achieve the goal of allowing comparison of project types across jurisdictional landscapes." It appears that the program is normalizing or standardizing benefits, not comparing. Consider removing or revising the language.
SSC Guidance	N/A		2	Define "large capital construction costs"
SSC Guidance	N/A		2	It is stated, "All qualifying projects or actions must be associated with the MS4." Further define what "associated with MS4" means.
SSC Guidance	N/A		3	The Permit only contains 10 Qualifying Project Types as LID projects were combined with treatment and flow control. This guidance contains 11 types. Ensure consistency amongst documents. Use the exact same terms in all documents.
SSC Guidance	N/A		3	Define Under (5) Property acquisition to provide additional runoff treatment and/or flow control benefits, define "likely development site"; would steep slopes or other difficult to develop parcels qualify as a likely development site?
SSC Guidance	N/A		4	(7&8) "Retained from the 2007 permit, this project type is not directly related to stormwater (i.e. not driven by stormwater capital planning) but provides stormwater benefits." Could other types of habitat restoration fit here such as native prairie restoration which do not have complete forest cover but would be restored to their native condition? Clarify the requirements for qualification under these types.
SSC Guidance	N/A		4	(9) "Floodplain reconnection projects on water bodies that are not flow control exempt per Appendix 1 (S5.C.6.a.ii(3)) – Qualifying floodplain reconnection projects will have an MS4..." Why include the language of not flow control exempt? Floodplain reconnection projects in areas such as the Puyallup River (which is considered to be flow control exempt) can have significant benefits.

				(10) - define permanent removal - will restrictions be required to be placed on the property? Would it be necessary to have a permanent restrict rive covenant or conservation easement on the property for credit to be given to this type of project? clarify how many trees per acre would be required to qualify under this item. This sentence is not clear, there appears to be some grammatical errors that impede understanding of what would qualify under this item. Suggest having a bulleted list.
SSC Guidance	N/A		4	
SSC Guidance	N/A		4	It is unclear if Category 11 only includes street sweeping and line cleaning. Under this category can Permittees develop their own incentive factors associated with other project types?
SSC Guidance	N/A		7	Consider making the retrofit incentive for property acquisition higher because it has a potentially very large benefit.
SSC Guidance	N/A		7	Bullets one and two on this page indicate: "greater "large storm" hydrologic benefit as compared to the standard flow control requirement. More incentive points for projects that provide greater "small storm" hydrologic benefit as compared to the LID Performance Standard." Allowing more points for larger facilities that are designed for a hypothetical larger storm may create facilities that are not properly sized for the contributing area and therefore may affect the facility function which may not be a benefit so additional points may not be appropriate for oversized facilities.
SSC Guidance	N/A		7	"More incentive points for runoff treatment projects that quantifiably address targeted pollutants, such as dissolved metals, phosphorus or other chemicals of concern." Who judges what the chemical of concern is and are they different for different waterbodies? Would basic treatment waters get more points if the facility treats something that isn't required like phosphorus, oil or metals (enhanced treatment)?
SSC Guidance	N/A		7	Consider increasing the value of street sweeping and line cleaning as the benefits are similar to other stormwater technologies designed to remove pollutants.
SSC Guidance	N/A		7	Define "complete" as used in determining the incentive points (75 complete/maintenance-stage incentive points).
SSC Guidance	N/A		8	The third column contains only Incentive Factors. Remove the heading "Retrofit Incentive Points" from Table 2 to avoid confusion in terminology.
SSC Guidance	N/A		8	Table 2 Comments: a. Does a jurisdiction have to monitor stormwater discharges from a treatment facility in order to determine if it meets the water quality standards and achieves a 2.5 incentive factor? Or is a calculation used to determine compliance? b. Change property acquisition incentive factor to at least 1.0 times acres acquired. c. Make restoration of forest cover incentive factor at least 0.5 times acres restored. Trees have been quantified as beneficial in many studies. d. For the maintenance section, is the area served by the maintenance activity the actual area served or an equivalent area? e. Define what types of properties will qualify as part of property acquisition. f. The City of Tacoma does not support the additional multipliers from footnote b because it is unknown if activities conducted under the watershed plans provide additional benefits.
SSC Guidance	N/A		9	For all calculations there should be rounding guidance. For example, at which stage of the calculation should rounding occur; how many significant digits; how many decimal points, etc. See the City of Tacoma 2016 SWMM (Volume 3, Section 1.6) for example guidance.
SSC Guidance	N/A		9	It is unclear what land use types and percentages of cover assumptions (ex. 65%, impervious) to use in the equivalent area calculations. It is recommended to provide a standard percent impervious area coverage based upon land use area (residential, commercial, etc.) so that calculations amongst jurisdictions are similar.
SSC Guidance	N/A		10	For runoff treatment, can non-pollution generating areas that drain the facility be included in the equivalent area calculations?
SSC Guidance	N/A		12	Why is it necessary to include a cost estimate? This is an additional level of effort that is not necessary for Permit compliance and is not considered in the retrofit incentive points. Ecology's analysis of previous year's data showed no correlation between costs and water quality benefits.
SSC Guidance	N/A		12	It is stated that a single project can obtain LID, Runoff Treatment, and Flow Control Retrofit Incentive Points. The calculation methodology for LID Retrofit Incentive Points is specific to infiltrative areas though a detention pond could achieve LID Standards (with a smaller equivalent area). It is unclear if, to be considered LID, the BMP must provide infiltration. Provide additional guidance or language if that is the intent. This comment applies in reverse as well when considered flow control facilities -does only the volume count toward the flow control portion.
SSC Guidance	N/A		12	Under the Runoff Treatment Section, oil control is specifically not included as an example for projects that could result in runoff treatment benefits. Is this intentional?
SSC Guidance	N/A		13	Why is it necessary to include lat/long? This is an additional level of effort for Appendix 12 that is already covered by the S5.C.2 mapping.
SSC Guidance	N/A	General		Throughout the document ensure consistency amongst the use of terminology, specifically BMP, facility, and project.
SSC Guidance	N/A	General		Can jurisdictions use partnerships to meet the S5.C.7 requirements? For example, can the City of Tacoma contribute funds to a City of Seattle project to obtain credits?

This is Tacoma's current collection screen. However, we are in process of updating and simplifying this tool. See below the screen shot for our draft.

18-0441
Print Preview
Recorder: [] Date: []
Accessed by MROSE on 11/14/2018 at 3:36:33 PM

Reported by: []
Address: []
Primary Ph: []
Secondary Ph: []
Best Call Time: []

Material: [Unknown / Other]
Source: [Unknown / Other]
Receiving Waters: [Unknown / Other]
Drainage Basin: []

COMPLAINT
Incident Date: []
Activity: [Unknown / Other]
Quantity: [Unknown] [Unknown / Other]

ALLEGED VIOLATOR / BUSINESS
Complaint Title: []
Business Name: []
Address: []
Parcel No. []
Contact: []
Phone: []

Business / Address Search
Partial Name: [] [Find]
Number/Street: [] [Go] [Help?]

Comments:
[Full Screen] []

Investigator: [Unassigned]
NOTIFICATIONS / ACTIONS
 Site Visit & Date: [] [select date]

Action(s) Taken:
 Enforcement
 Investigate
 No Action
 Voluntary Compliance
 In Compliance
 Written Response
 Technical Assistance
 Refer to WDOE
 Refer to TPCHD
 Hazard Material
 Photos Taken / Total: [0]
 Samples Taken

Narrative Comments:
[Full Screen] []

Follow Up Action(s):
 Owner Notified []
 Caller Notified []
 BMPs
 Cleanup Required
 Cost Recovery
 Inspection Required
 Transmission Notified
 Streets & Grounds Notified
 Others City Dept Notified

Other:
 SSO
 Completed

Approved By: [] Date: [] [select date]

This is a draft of our proposed new IDDE recording and reporting application.

Project name: Incident Response

Requestor and group: Environmental Compliance Business Operations

CALL INTAKE FORM

Designed to intake caller information to determine response time needed and which crew to dispatch, storm or general inspection. Proposed to be setup in ESRI popup window as service.

Proposed Fields: (***Bold italics represent Alias***)

Category: (Dropdown) (Required)

- 1 ***Spill***
- 2 ***Environmental Issue***
- 3 ***Sewer Issue***
- 4 ***Flooding issue***

- 5 *Tree Issue*

Suspected Material: (Dropdown) (Subtyped) (Required)

- Spill
 - Concrete *Concrete Washout*
 - FOG *Fats/Oils/Grease (Food Related)*
 - Hazard *Household Hazardous Waste*
 - Oil *Petroleum spill (vehicle oils and gas)*
 - Paint *Paint Spill*
- Environmental Issue
 - Animal *Animal Waste*
 - Oder *Smelly Oder*
 - SolidWaste *Trash or Debris*
 - Hazard *Household Hazardous Waste Containers*
 - Mud *Construction Site Dirt or Trackout*
 - Paint *Abandoned Paint Containers*
 - Water *Wash Water*
 - Other *Other*
 - *Should not use and needs to be audited on a regular basis*
- Sewer Issue
 - Sewer *Sewage backup or spill*
- Flooding issue
 - LocStorm *Private Property Flooding*
 - RegStorm *Intersection Flooding*
- Tree Issue
 - TreeIssue *Tree Issue*
 - Any other tree issue not defined as a tree emergency
 - TreeEmergency *Tree Emergency*
 - Tree Issue which poses an immediate threat to life, health, property, or environment

OtherDesc: *Other Description* (Hide if other is not selected)

- Description of other when used

Incident Date: (Default: Current date/Time)

Incident Title: (required)

- Description used when tabularly displaying lists of incidents
- Should be less than 50 chars

Description: (required)

- A description of the issue as transcribed by the call intake person from the caller

Contact Person: (required)

- Name of the person who called or emailed issue

- Not Call intake person
- User should Place Anonymous if caller will not provide

Follow-upRequested: *Follow-up Requested?* (yes/no Boolean)

ContactPhone: *Contact Phone* (Contact phone or ContactAlt must be filled in if Follow-upRequested is 1(YES))
(hide if Follow-upRequested 0 (no))

- Phone

ContactAlt: *Alternative Contact* (Contact phone or ContactAlt must be filled) (hide if Follow-upRequested 0 (no))

- Phone or email

CallIntakePerson: AutoCalculate windows user (hide)

- Bert/Sparky Grab and place windows user into field

CallIntakeDateTime: AutoCalculate (hide)

RESPONSE FORMS

Designed to be in .net form

See call intake form for read only fields which should be displayed at the top of this form.

Assigned Date – Date incident was first assigned to staff

Completion date – Date incident response was completed (autocalc on selection of completed)

Assigned Staff member – Staff member currently assigned to the complaint (does not need multiple assignments at this time).

Inform/ Referred to other – Dropdown if refer to other checkbox is checked

- N/A (default)
- Other COT
- Other Gov't Agency
- Ecology

ERTS # - if user selects refer or inform Ecology then **require** ERTS # with Format (yy-xxxx)

Closest address – Read only display from GIS data on 60

Confirmed material – Same list as call intake plus No Material

- Default selected from field in 60 on intake side
- No material – In case caller reported a non-issue(may not need this but wanted to note it for further discussion)

Photos – Need some way to handle photo upload, prefer drag and drop or tablet based upload

Actions checkboxes – checkbox for each, must have at least one checked

- Site visit – Checked if a site visit was performed
 - Site visit date/time – If checked ask user for date/time
- Inform/Refer – Voluntary compliance or referral which constitutes as educating the caller and/or complainant (level 1)
- Enforcement – requiring action which requires a minimum of a letter and/civil penalty (level 2-7)
 - Enforcement Level if checked ask user to select level 2-7
 - Levels should match Enforcement response plan attached to this document as supplemental and should be the high level reached throughout the compliance process
- Staff Cleanup – Staff found an issue and due to its small size addressed it (Example paint cans.. staff disposed of the cans)

Comments/Notes – Notes about the response

Thea Foss Complaints and Spills – 16 years of database records (2002-2017)

Year	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Chemical	17	13	20	11	6	3	13	6	8	11	9	9	9	8	5	2	150
Concrete	3	6	6	6	4	9	9	3	3	5	4	11	10	4	13	2	98
FOG						9	4	5	2	6	6	11	4	3	9	0	59
Garbage						12	0	14	25	10	25	18	20	5	4	6	139
Mud	23	22	18	21	13	17	21	17	13	26	51	36	37	13	23	11	362
Paint	9	12	9	9	3	7	4	3	4	4	4	3	6	7	6	7	97
Petroleum	47	55	70	53	42	57	35	33	81	90	94	82	65	51	49	42	946
Sewage	9	25	31	23	34	16	20	23	34	64	71	64	29	35	25	26	529
Soap	18	22	9	4	11	1	4	16	9	5	8	12	4	2	5	3	133
Toxic													1	0		0	1
Unknown	15	17	6	28	77	12	15	14	11	18	14	18	13	40	14	27	339
Water	11	25	13	21	29	15	19	13	22	23	36	20	32	25	33	17	354
Animal Waste														1	1	0	2
Odor														3		0	3
Total	152	197	182	176	219	158	144	147	212	262	322	284	230	197	187	143	3212

There needs to be some guidance on how to answer these questions. These answers are all only likely answers unless the inspector is there at the time of the illicit discharge - everything else is an assumption based upon the inspection. The legal implications must be clearly written in the Permit.

APPENDIX 14 – IDDE Reporting data and format

Updated on 9/21/18 to reflect changes made to the form within the WQwebIDDE application

Permittees are required to submit the following information with the online annual report form, or an alternative format provided by Ecology if requested, pursuant to Special Condition S9.A.

This is the complete list of information that all Permittees are required to report for each IDDE incident found, reported to, or investigated by the Permittee. Each Permittee may either use their own system or the WQWebIDDE form for recording this data. If using your own tracking system, this information must be provided in an electronic format that follows the data schema provided at the end of this document and is easily transferred to a database. Ecology prefers a zipped .xml. An excel spreadsheet or space- or tab-delimited file that follows the data schema is acceptable.

A complete report will include a separate entry (even if left blank) for every line below and must use the precise verbiage and spelling below. For all incidents where the answer to #7 is no, #8 is required but #9-15 are not required. Each field that ends in a colon (“:”) is followed by a text answer. All dates are in MM/DD/YYYY format.

Is the intent of this form to be filled out upon first discovery or after full investigation and determination?

Why is this necessary for data analysis?

1. ~~Jurisdiction name and permit number:~~

Unclear why the jurisdictions individual tracking is needed for data analysis. Remove.

2. ~~Incident ID assigned by jurisdiction:~~

3. ~~Date of incident:~~

4. Date incident was reported to you:

Not always know. And why is this necessary. Suggest removing and just keep when incident was reported.

5. Date of beginning your response:

6. Date of end of your response

- Date Response Ended:
- Final resolution?
 - Yes
 - No
- If transferred to another party, specify that party:

It is unclear when No would ever be chosen. Once a response is initiated, is it not required that it will be resolved? I think what you are trying to get out of this is if the Permit terms were met for investigation. If that is the case, use the Permit language here. And how does this help with regional prioritization? and these boxes don't seem to function properly on the web form

7. Discharge to MS4?

- Yes
 - ~~Estimated Quantity~~
 - ~~Unknown~~

too subjective. How will this be used?

- ~~Sheen~~ ← Is this a yes/no?
- ~~Estimated amount of discharge:~~ ← What are implications if the estimate is not accurate?
 - ~~Gallons~~
 - ~~Pounds~~
 - ~~Cubic feet~~ ← On the web app you can select a negative amount of discharge, please explain intent.
- ~~Discharge Frequency~~ ← Why? What are implications if the response is not accurate?
 - ~~Continuous or ongoing~~
 - ~~Intermittent~~
 - ~~One-time~~
- Receiving water ← What are you supposed to put here? The name? The type? Yes/No?
- No
 - No problem found ← This should be one of the first questions.
 - Cleaned up ← what does this mean? it went to ms4 and was cleaned? or cleaned before MS4. so it's not an illicit discharge then.
 - Discharge to combined or sanitary sewer
 - Discharge to private or other sewer ← stormwater? what does other sewer mean?
 - Discharge to ground
 - Other
- Unknown ← This should be the most popular choice because it is not likely that inspector will be there during the incident so it is likely always unknown.

8. How was the incident discovered or reported to you?

- Referral
 - ~~Pollution hotline~~
 - ~~Direct report to your staff~~ ← How will these help answer any of the questions.
 - ~~Staff referral~~
 - ~~Other agency referral~~
 - ~~ERTS~~ ← Would ERTS send a spill to us?
- IDDE field observation ← What is the difference between the IDDE field observation and a MS4 inspection?
- Business Inspection
- Construction Inspection ← MS4 or NPDES? and what if both
- MS4 Inspection ← How will these help answer any of the questions.
 - ~~Catch basin or manhole~~
 - ~~Outfall~~
 - ~~Stormwater BMP~~ ← Permanent or source control or construction or all?

- ~~Other MS4 Inspection~~
 - ~~Explain:~~
 - Other Inspection
 - Explain:
 - Other
 - Explain:
9. **G3 notification?** (G3 notification required?)
- Yes
 - ERTS case number:
 - No
10. **Incident location** (provide at least one)
- ~~Street Address~~
 - ~~Street:~~
 - ~~City:~~
 - ~~State:~~
 - ~~Zip:~~
 - Nearest Intersection:
 - Tax Parcel:
 - Latitude/Longitude
 - Latitude:
 - Longitude:
11. **Pollutants identified** (select all that apply, explain if needed)
- ~~None found~~
 - Unconfirmed, unspecified, or not identified
 - Solid waste
 - ~~Trash~~
 - ~~Sediment/soil~~
 - ~~Cement, concrete, lime, or plaster~~
 - ~~Yard waste or other plant or wood waste~~
 - ~~Food waste~~
 - ~~Pet waste or human waste~~

How different than other. Also seems duplicative of Other MS4 Inspection.

How will this information be used?

The incident could be several locations as revealed by a source trace; what incident location is this referring to?
This could be potential liability

Address not recommended.

Explain what is meant by provide at least one.

explain only allowed under other

What are the implications of mis-characterizing a pollutant? Without extensive training and specialized equipment it is not possible to correctly identify pollutants with accuracy.

Already answered under question #7.

The result for finding solid waste is the same so why include the type?

- ~~Carpet cleaning waste~~
 - ~~Roofing materials~~
 - ~~Road tar~~
 - Liquid waste
 - Vehicle oil, fuel, or other lubricant ← Under Oil too.
 - Antifreeze or other coolant
 - Paint
 - Sewage/septage
 - Oil
 - Vehicle ~~oil, fuel, or other lubricant~~
 - Food ~~preparation oil~~
 - Heating oil or kerosene ← Not easy to identify. Outcome for cleanup is same so why distinguish.
 - Chemical ← Do you also check solid or liquid if you find chemical?
 - Household or industrial chemical ← This could be under many categories. Like foam, oils, pesticides, refrigerants, etc.
 - Explain:
 - Pesticide or herbicide
 - Fertilizer
 - Foam
 - ~~Soap/detergent~~
 - ~~Fire-fighting foam~~ ← Too specific.
 - ~~Other or unknown foam~~
 - Other
 - ~~PCBs~~
 - ~~Refrigerant~~ ← same as household chemical
 - ~~Chlorinated water~~ ← same as sewerage? how do you find bacteria during a site investigation?
 - ~~Bacteria~~ ← explain only allowed under other.
 - Other not listed
 - Explain:
- 12. Source or cause** (select all that apply, explain if needed)
- Not applicable ← when is this the answer?
 - Not identified
 - Illicit connection

- Dumping
 - Spill
 - Construction activity
 - Construction BMP failure
 - Structural BMP failure
 - Vehicle related
 - Fueling
 - Vehicle collision/accident
 - Auto repair
 - Vehicle washing
 - Vehicle leakage/fluids
 - Improper business operation or activity
 - Equipment cleaning
 - Pressure washing
 - Leaking or abandoned container/dumpster
 - Drive-thru
 - Mobile business
 - Explain:
 - Retail operations
 - Restaurant
 - Non-emergency firefighting or training
 - Logging
 - Livestock
 - Other
 - Explain:
 - ~~Allowable discharge~~
 - ~~Diverted stream flow~~
 - ~~Flow from riparian habitat or wetland~~
 - ~~Uncontaminated ground water or spring water~~
 - ~~Foundation or footing drain~~
 - ~~Uncontaminated water from crawl space pump~~
 - ~~Air conditioning condensation~~
- could be part of vehicle related, construction, improper business operations, spill is very broad.
- always the answer - no drop down needed.
- This portion is confusing because of the mix of activities and business types. Revise list to just be activities.
- drive-thru same as restaurant.
- This could be the same as all of the options in this list.
- not needed because this would not be an IDDE or just put allowable discharge upfront as an option of not being IDDE

- ~~Irrigation water from agricultural source~~
- ~~Emergency firefighting~~
- ~~Conditionally allowed discharge~~
 - ~~Potable water~~
 - ~~Water line flushing or testing~~ ← why include if not IDDE.
 - ~~Lawn watering or other irrigation~~
 - ~~Dechlorinated pool/spa water~~
 - ~~Street/sidewalk wash water~~
- ~~Surface runoff~~ ← again, not IDDE
 - ~~Due to drainage or grade conditions~~
 - ~~Stormwater or flood water~~
 - ~~Groundwater pumping~~
 - Broken or clogged water or sewer line
 - Other
 - Explain: ← make own surfacing effluent category not called surface runoff.
 - Septic system ←
 - Other
 - Explain: ← explain only allowed under other

13. Source tracing approach used (select all that apply, explain if needed)

- Not applicable ← do you always have to say this if not an IDDE? When is this used?
- Visual observation
- Smell/odor
- Map analysis
- ~~Further inspection or reconnaissance~~ ← this is implied as happening already.
- Indicator testing
 - Flow/discharge
 - Sheen/oil
 - Floatables
 - Detergent or surfactants
 - Ammonia
 - Color ← Already called out above as smell/odor and visual observation.
 - Odor

- pH
- Temperature
- Turbidity
- Hardness
- Nitrates
- Potassium
- Specific conductivity
- Bacteria
- Chloride/chlorine
- Fluoride
- Carbon monoxide
- Hydrogen sulfide
- Other
 - Explain:
- Dye testing
- Pressure testing
- Smoke testing
- Video inspection
- Canine detection
- Optical brightener
- Sand bagging
- Other
 - Explain:

source tracing approach is probably most useful as a fill in narrative specific to the IDDE. This captures some specific elements but is too much for a pull down.



in there twice.

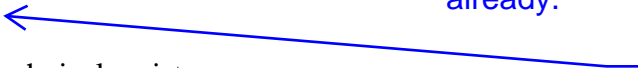
explain not available with every option



14. Correction/elimination methods used (select all that apply, explain if needed)

- No action needed
 - Explain:
- Clean-up
- Education/technical assistance
- Add or modify operational BMP
- Add or modify structural BMP
- Enforcement:
 - Verbal notice

all the other questions should explain this already.

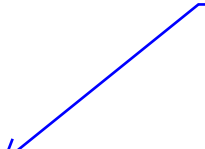


does this mean clean up by Permittee? This should always be chosen.


Enforcement may happen at a later time - how many times is Permittee expected to add data to this report?

- Written warning
- Correction notice
- Stop work order
- Legal notice
- Penalty or fine
- Referred to other agency or department
- Follow-up or further investigation
- Problem not abated
 - Explain:
- Other
 - Explain:

This question was asked in previous sections - how do you know whether to check here or in the other section or both?



you wouldn't have a closed date if follow-up was needed or if problem was not abated.



15. Field notes, explanations, and/or other comments

- Notes:

IDDE XML Schema Document (IDDE.xsd)

```
<xs:schema xmlns:xs="http://www.w3.org/2001/XMLSchema">
  <xs:element name="IDDEEvents">
    <xs:complexType>
      <xs:sequence>
        <xs:element maxOccurs="unbounded" name="IDDEEvent" type="IDDEEvent" />
      </xs:sequence>
    </xs:complexType>
  </xs:element>

  <xs:complexType name="IDDEEvent">
    <xs:annotation>
      <xs:documentation>One particular IDDE event</xs:documentation>
    </xs:annotation>
    <xs:all>
      <xs:element maxOccurs="1" minOccurs="1" name="Jurisdiction">
        <xs:annotation>
          <xs:documentation>Permit Number</xs:documentation>
        </xs:annotation>
        <xs:simpleType>
          <xs:restriction base="xs:string">
            <xs:maxLength value="9"/>
          </xs:restriction>
        </xs:simpleType>
      </xs:element>
    </xs:all>
  </xs:complexType>
</xs:schema>
```

```
<xs:element maxOccurs="1" minOccurs="1" name="IncidentId" type="xs:string">
```

```
<xs:annotation>
```

```
<xs:documentation>Incident ID</xs:documentation>
```

```
</xs:annotation>
```

```
<xs:simpleType>
```

```
<xs:restriction base="xs:string">
```

```
<xs:maxLength value="50"/>
```

```
</xs:restriction>
```

```
</xs:simpleType>
```

```
</xs:element>
```

```
<xs:element maxOccurs="1" minOccurs="0" name="DateIncident" type="SqlDate">
```

```
<xs:annotation>
```

```
<xs:documentation>Date of incident</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:element>
```

```
<xs:element maxOccurs="1" minOccurs="0" name="DateReported" type="SqlDate">
```

```
<xs:annotation>
```

```
<xs:documentation>Date incident reported</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:element>
```

```
<xs:element maxOccurs="1" minOccurs="0" name="DateResponseBegin" type="SqlDate">
```

```
<xs:annotation>
```

```
<xs:documentation>Date incident response began</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:element>
```

```
<xs:element maxOccurs="1" minOccurs="0" name="Resolved" type="Resolution">
```

```
<xs:annotation>
```

```
<xs:documentation>Was incident resolved here?</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:element>
```

```
<xs:element maxOccurs="1" minOccurs="0" name="Discharge" type="Discharge">
```

```
<xs:annotation>
```

```
<xs:documentation>Discharge to MS4 details</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:element>
```

```
<xs:element maxOccurs="1" minOccurs="0" name="Discovered" type="Discovered">
```

```
<xs:annotation>
```

```
<xs:documentation>How was the incident discovered?</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:element>
```

```
<xs:element maxOccurs="1" minOccurs="0" name="G3" type="G3Notification">
```

```
<xs:annotation>
```

```
<xs:documentation>Does this incident require a G3 notification? What is its ERTS  
number?</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:element>
```

```
<xs:element maxOccurs="1" minOccurs="0" name="Location" type="Location">
```

```
<xs:annotation>
```

```
<xs:documentation>Location of discharge</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:element>
```

```
<xs:element maxOccurs="1" minOccurs="0" name="Pollutants" type="Pollutant">
  <xs:annotation>
    <xs:documentation>Pollutants identified</xs:documentation>
  </xs:annotation>
</xs:element>

<xs:element maxOccurs="1" minOccurs="0" name="Sources" type="Source">
  <xs:annotation>
    <xs:documentation>Source or cause</xs:documentation>
  </xs:annotation>
</xs:element>

<xs:element maxOccurs="1" minOccurs="0" name="Traces" type="Trace">
  <xs:annotation>
    <xs:documentation>Source Tracing</xs:documentation>
  </xs:annotation>
</xs:element>

<xs:element maxOccurs="1" minOccurs="0" name="Corrections" type="Correction">
  <xs:annotation>
    <xs:documentation>Correction or elimination methods</xs:documentation>
  </xs:annotation>
</xs:element>

<xs:element maxOccurs="1" minOccurs="0" name="Notes" type="xs:string">
  <xs:annotation>
    <xs:documentation>Field notes, explanations, and/or other comments</xs:documentation>
  </xs:annotation>
</xs:element>
```

</xs:all>

</xs:complexType>

<xs:simpleType name="SqlDate">

<xs:annotation>

<xs:documentation>xs:date limited to SQL Server's operating range</xs:documentation>

</xs:annotation>

<xs:restriction base="xs:date">

<xs:minInclusive value="1753-01-01" />

<xs:maxInclusive value="9999-12-31" />

</xs:restriction>

</xs:simpleType>

<xs:complexType name="Resolution">

<xs:annotation>

<xs:documentation>Incident resolution</xs:documentation>

</xs:annotation>

<xs:simpleContent>

<xs:extension base="SqlDate">

<xs:attribute name="final" use="optional" type="xs:boolean">

<xs:annotation>

<xs:documentation>Did you resolve the incident?</xs:documentation>

</xs:annotation>

</xs:attribute>

<xs:attribute name="transferred" use="optional" type="xs:string">

<xs:annotation>

<xs:documentation>Who was the incident transferred to (if any)</xs:documentation>

```
</xs:annotation>
</xs:attribute>
</xs:extension>
</xs:simpleContent>
</xs:complexType>
<xs:complexType name="Discharge">
  <xs:choice>
    <xs:element name="Yes" type="YesMS4Discharge"/>
    <xs:element name="No" type="NoMS4Discharge"/>
    <xs:element name="Unknown" type="UnknownMS4Discharge"/>
  </xs:choice>
</xs:complexType>
<xs:complexType name="Discovered">
  <xs:sequence>
    <xs:element maxOccurs="unbounded" name="Discovered">
      <xs:complexType>
        <xs:sequence>
          <xs:element maxOccurs="1" minOccurs="0" name="Explain" type="xs:string"/>
        </xs:sequence>
        <xs:attribute name="type" type="DiscoveredType"/>
      </xs:complexType>
    </xs:element>
  </xs:sequence>
</xs:complexType>
<xs:complexType name="G3Notification">
```

```
<xs:attribute name="g3" use="required" type="xs:boolean"/>
<xs:attribute name="erts_id" use="optional" type="xs:string"/>
</xs:complexType>
<xs:complexType name="Location">
  <xs:all>
    <xs:element maxOccurs="1" minOccurs="0" name="Address" type="AddressType" />
    <xs:element maxOccurs="1" minOccurs="0" name="LatLongIntersection"
type="LatLongTypeIntersectionType" />
    <xs:element maxOccurs="1" minOccurs="0" name="TaxParcel" type="TaxParcelType" />
    <xs:element maxOccurs="1" minOccurs="0" name="IntersectionLatLong"
type="IntersectionTypeLatLongType" />
  </xs:all>
</xs:complexType>
<xs:complexType name="Discovered">
<xs:sequence>
<xs:element maxOccurs="unbounded" name="Discovered">
<xs:complexType>
<xs:sequence>
<xs:element maxOccurs="1" minOccurs="0" name="Explain" type="xs:string"/>
</xs:sequence>
<xs:attribute name="type" type="DiscoveredType"/>
</xs:complexType>
</xs:element>
</xs:sequence>
</xs:complexType>
<xs:complexType name="Pollutant">
```

```
<xs:sequence>
  <xs:element maxOccurs="unbounded" name="Pollutant">
    <xs:complexType>
      <xs:sequence>
        <xs:element maxOccurs="1" minOccurs="0" name="Explain" type="xs:string"/>
      </xs:sequence>
      <xs:attribute name="type" type="PollutantType"/>
    </xs:complexType>
  </xs:element>
</xs:sequence>
</xs:complexType>
<xs:complexType name="Source">
  <xs:sequence>
    <xs:element maxOccurs="unbounded" name="Source">
      <xs:complexType>
        <xs:sequence>
          <xs:element maxOccurs="1" minOccurs="0" name="Explain" type="xs:string"/>
        </xs:sequence>
        <xs:attribute name="type" type="SourceType"/>
      </xs:complexType>
    </xs:element>
  </xs:sequence>
</xs:complexType>
<xs:complexType name="Trace">
  <xs:sequence>
```



```
<xs:element maxOccurs="unbounded" name="Trace">
  <xs:complexType>
    <xs:sequence>
      <xs:element maxOccurs="1" minOccurs="0" name="Explain" type="xs:string"/>
    </xs:sequence>
    <xs:attribute name="type" type="TraceType"/>
  </xs:complexType>
</xs:element>
</xs:sequence>
</xs:complexType>
<xs:complexType name="Correction">
  <xs:sequence>
    <xs:element maxOccurs="unbounded" name="Correction">
      <xs:complexType>
        <xs:sequence>
          <xs:element maxOccurs="1" minOccurs="0" name="Explain" type="xs:string"/>
        </xs:sequence>
        <xs:attribute name="type" type="CorrectionType"/>
      </xs:complexType>
    </xs:element>
  </xs:sequence>
</xs:complexType>
<xs:complexType name="NoMS4Discharge">
  <xs:annotation>
    <xs:documentation>No discharge reached MS4</xs:documentation>
  </xs:annotation>
</xs:complexType>
```

```
</xs:annotation>  
<xs:sequence>  
<xs:element maxOccurs="1" minOccurs="0" name="Explain" type="xs:string"/>  
</xs:sequence>  
<xs:attribute name="reason" type="NoMs4Reason"/>  
</xs:complexType>  
<xs:complexType name="YesMS4Discharge">  
  <xs:annotation>  
    <xs:documentation>Discharge reached MS4</xs:documentation>  
  </xs:annotation>  
  <xs:attribute name="type" type="DischargeType"/>  
  <xs:attribute name="frequency" type="DischargeFrequency"/>  
  <xs:attribute name="waterbody" type="xs:string">  
    <xs:annotation>  
      <xs:documentation>Receiving waterbody</xs:documentation>  
    </xs:annotation>  
  </xs:attribute>  
  <xs:attribute name="volume" type="xs:integer">  
    <xs:annotation>  
      <xs:documentation>Number of gallons, pounds, or cubic feet</xs:documentation>  
    </xs:annotation>  
  </xs:attribute>  
</xs:complexType>  
<xs:complexType name="NoMS4Discharge">  
  <xs:annotation>
```

```
<xs:documentation>No discharge reached MS4</xs:documentation>  
</xs:annotation>  
<xs:sequence>  
<xs:element maxOccurs="1" minOccurs="0" name="Explain" type="xs:string"/>  
</xs:sequence>  
<xs:attribute name="reason" type="NoMs4Reason"/>  
</xs:complexType>  
<xs:complexType name="UnknownMS4Discharge">  
  <xs:annotation>  
    <xs:documentation>Unknown if discharge reached MS4</xs:documentation>  
  </xs:annotation>  
</xs:complexType>  
<xs:simpleType name="DischargeType">  
  <xs:annotation>  
    <xs:documentation>Type of discharge to MS4</xs:documentation>  
  </xs:annotation>  
  <xs:restriction base="xs:string">  
    <xs:enumeration value="0">  
      <xs:annotation>  
        <xs:documentation>Unknown</xs:documentation>  
      </xs:annotation>  
    </xs:enumeration>  
    <xs:enumeration value="1">  
      <xs:annotation>  
        <xs:documentation>Sheen</xs:documentation>
```

</xs:annotation>
</xs:enumeration>
<xs:enumeration value="2">
<xs:annotation>
<xs:documentation>Gallons</xs:documentation>
<xs:appinfo>Explain</xs:appinfo>
</xs:annotation>
</xs:enumeration>
<xs:enumeration value="3">
<xs:annotation>
<xs:documentation>Pounds</xs:documentation>
<xs:appinfo>Explain</xs:appinfo>
</xs:annotation>
</xs:enumeration>
<xs:enumeration value="4">
<xs:annotation>
<xs:documentation>Cubic Feet</xs:documentation>
<xs:appinfo>Explain</xs:appinfo>
</xs:annotation>
</xs:enumeration>
</xs:restriction>
</xs:simpleType>
<xs:simpleType name="DischargeFrequency">
<xs:annotation>
<xs:documentation>Frequency of discharge to MS4</xs:documentation>

```
</xs:annotation>  
<xs:restriction base="xs:string">  
<xs:enumeration value="0">  
<xs:annotation>  
<xs:documentation>Continuous or Ongoing</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="1">  
<xs:annotation>  
<xs:documentation>Intermittent</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="2">  
<xs:annotation>  
<xs:documentation>One-Time</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
</xs:restriction>  
</xs:simpleType>  
<xs:simpleType name="NoMs4Reason">  
<xs:annotation>  
<xs:documentation>Reason there was no discharge to MS4</xs:documentation>  
</xs:annotation>  
<xs:restriction base="xs:string">  
<xs:enumeration value="10">
```

```
<xs:annotation>  
  <xs:documentation>No problem found</xs:documentation>  
</xs:annotation>  
</xs:enumeration>
```

```
<xs:enumeration value="1">
```

```
<xs:annotation>
```

```
2">
```

```
<xs:annotation>
```

```
<xs:documentation>Cleaned up</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:enumeration>
```

```
<xs:enumeration value="2">
```

```
<xs:annotation>
```

```
3">
```

```
<xs:annotation>
```

```
<xs:documentation>Discharge to combined or sanitary sewer</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:enumeration>
```

```
<xs:enumeration value="4">
```

```
<xs:annotation>
```

```
3">
```

```
<xs:annotation>
```

```
<xs:documentation>Discharge to private or other sewer</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:enumeration>
```

<xs:enumeration value="4">

~~<xs:annotation>~~

~~5">~~

~~<xs:annotation>~~

<xs:documentation>Discharge to ground</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="6">

~~<xs:annotation>~~

~~5">~~

~~<xs:annotation>~~

<xs:documentation>Other</xs:documentation>

<xs:appinfo>Explain</xs:appinfo>

</xs:annotation>

</xs:enumeration>

</xs:restriction>

</xs:simpleType>

<xs:simpleType name="DischargeType">

~~<xs:annotation>~~

~~<xs:documentation>Type of discharge to MS4</xs:documentation>~~

~~</xs:annotation>~~

~~<xs:restriction base="xs:string">~~

~~<xs:enumeration value="1">~~

~~<xs:annotation>~~

~~<xs:documentation>Unknown</xs:documentation>~~

~~</xs:annotation>~~

```
</xs:enumeration>  
<xs:enumeration value="2">  
<xs:annotation>  
<xs:documentation>Sheen</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="3">  
<xs:annotation>  
<xs:documentation>## Gallons</xs:documentation>  
<xs:appinfo>Explain</xs:appinfo>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="4">  
<xs:annotation>  
<xs:documentation>## Pounds</xs:documentation>  
<xs:appinfo>Explain</xs:appinfo>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="5">  
<xs:annotation>  
<xs:documentation>## Cubic Feet</xs:documentation>  
<xs:appinfo>Explain</xs:appinfo>  
</xs:annotation>  
</xs:enumeration>  
</xs:restriction>  
</xs:simpleType>  
<xs:simpleType name="DischargeFrequency">
```



```
<xs:annotation>  
<xs:documentation>Frequency of discharge to MS4</xs:documentation>  
</xs:annotation>  
<xs:restriction base="xs:string">  
<xs:enumeration value="0">  
<xs:annotation>  
<xs:documentation>Unknown</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="1">  
<xs:annotation>  
<xs:documentation>Continuous or Ongoing</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="2">  
<xs:annotation>  
<xs:documentation>Intermittent</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="3">  
<xs:annotation>  
<xs:documentation>One Time</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
</xs:restriction>
```

```
</xs:simpleType>  
<xs:simpleType name="LatNumber">  
<xs:annotation>  
<xs:documentation>Latitude, 6 decimal digits.</xs:documentation>  
</xs:annotation>  
<xs:restriction base="xs:decimal">  
<xs:totalDigits value="8" />  
<xs:fractionDigits value="6" />  
<xs:minInclusive value="-90" />  
<xs:maxInclusive value="90" />  
</xs:restriction>  
</xs:simpleType>  
<xs:simpleType name="LongNumber">  
<xs:annotation>  
<xs:documentation>Longitude, 6 decimal digits.</xs:documentation>  
</xs:annotation>  
<xs:restriction base="xs:decimal">  
<xs:totalDigits value="9" />  
<xs:fractionDigits value="6" />  
<xs:minInclusive value="-180" />  
<xs:maxInclusive value="180" />  
</xs:restriction>  
</xs:simpleType>  
<xs:complexType name="LatLongType">  
<xs:annotation>
```

```
<xs:documentation>Latitude Longitude pair, 6 decimal digits.</xs:documentation>  
</xs:annotation>  
<xs:sequence>  
<xs:element name="Latitude" type="LatNumber" />  
<xs:element name="Longitude" type="LongNumber" />  
</xs:sequence>  
</xs:complexType>  
<xs:simpleType name="TaxParcelType">  
<xs:annotation>  
<xs:documentation>Tax Parcel</xs:documentation>  
</xs:annotation>  
<xs:restriction base="xs:string" />  
</xs:simpleType>  
<xs:simpleType name="IntersectionType">  
<xs:annotation>  
<xs:documentation>Intersection, Cross streets</xs:documentation>  
</xs:annotation>  
<xs:restriction base="xs:string" />  
</xs:simpleType>  
<xs:complexType name="AddressType">  
<xs:annotation>  
<xs:documentation>Conventional Street Address</xs:documentation>  
</xs:annotation>  
<xs:sequence>  
<xs:element name="Address" type="xs:string" />
```

```
==<del><xs:element name="City" type="xs:string"/></del>
==<del><xs:element name="State" type="xs:string"/></del>
==<del><xs:element name="PostalCode" type="xs:string"/></del>
==<del></xs:sequence></del>
==<del></xs:complexType></del>
  ==<del><xs:simpleType name="LocationType"></del>
    ==<del><xs:annotation></del>
      ==<del><xs:documentation>Responses for Type of location reference</xs:documentation></del>
    ==<del></xs:annotation></del>
    ==<del><xs:restriction base="xs:string"></del>
      ==<del><xs:enumeration value="1"></del>
        ==<del><xs:annotation></del>
          ==<del><xs:documentation>Address</xs:documentation></del>
        ==<del></xs:annotation></del>
      ==<del></xs:enumeration></del>
      ==<del><xs:enumeration value="2"></del>
        ==<del><xs:annotation></del>
          ==<del><xs:documentation>Tax Parcel</xs:documentation></del>
        ==<del></xs:annotation></del>
      ==<del></xs:enumeration></del>
      ==<del><xs:enumeration value="3"></del>
        ==<del><xs:annotation></del>
          ==<del><xs:documentation>Intersection</xs:documentation></del>
        ==<del></xs:annotation></del>
      ==<del></xs:enumeration></del>
      ==<del><xs:enumeration value="4"></del>
        ==<del><xs:annotation></del>
          ==<del><xs:documentation>Latitude Longitude</xs:documentation></del>
        ==<del></xs:annotation></del>
```

```
</xs:enumeration>  
  </xs:restriction>  
  </xs:simpleType>  
<xs:simpleType name="DiscoveredType">  
  <xs:annotation>  
    <xs:documentation>Responses for How was this incident discovered or reported to  
you?</xs:documentation>  
  </xs:annotation>  
  <xs:restriction base="xs:string">  
    <xs:enumeration value="0">  
      <xs:annotation>  
        <xs:appinfo>Referral</xs:appinfo>  
        <xs:documentation>Referral</xs:documentation>  
      </xs:annotation>  
    </xs:enumeration>  
    <xs:enumeration value="1">  
      <xs:annotation>  
        <xs:appinfo>Referral</xs:appinfo>  
        <xs:documentation>Pollution hotline</xs:documentation>  
      </xs:annotation>  
    </xs:enumeration>  
    <xs:enumeration value="2">  
      <xs:annotation>  
        <xs:appinfo>Referral</xs:appinfo>  
        <xs:documentation>Direct report to your staff</xs:documentation>  
      </xs:annotation>  
    </xs:enumeration>
```

```
<xs:enumeration value="3">
  <xs:annotation>
    <xs:appinfo>Referral</xs:appinfo>
    <xs:documentation>Staff referral</xs:documentation>
  </xs:annotation>
</xs:enumeration>
<xs:enumeration value="4">
  <xs:annotation>
    <xs:appinfo>Referral</xs:appinfo>
    <xs:documentation>Other agency referral</xs:documentation>
  </xs:annotation>
</xs:enumeration>
<xs:enumeration value="5">
  <xs:annotation>
    <xs:appinfo>Referral</xs:appinfo>
    <xs:documentation>ERTS</xs:documentation>
  </xs:annotation>
</xs:enumeration>
<xs:enumeration value="6">
  <xs:annotation>
    <xs:documentation>IDDE field observation</xs:documentation>
  </xs:annotation>
</xs:enumeration>
<xs:enumeration value="7">
  <xs:annotation>
```

~~_____~~ ~~<xs:appinfo>Inspection</xs:appinfo>~~
~~<xs:documentation>Business Inspection</xs:documentation>~~

~~_____~~ ~~</xs:annotation>~~

~~_____~~ ~~</xs:enumeration>~~

~~=====~~ ~~</xs:annotation>~~

~~=====~~ ~~</xs:enumeration>~~

<xs:enumeration value="8">

<xs:annotation>

~~_____~~ ~~<xs:appinfo>Inspection</xs:appinfo>~~

~~<xs:documentation>Construction Inspection</xs:documentation>~~

~~_____~~ ~~</xs:annotation>~~

~~_____~~ ~~</xs:enumeration>~~

~~_____~~ ~~<xs:enumeration value="9">~~

~~_____~~ ~~<xs:annotation>~~

~~_____~~ ~~<xs:appinfo>MS4 Inspection</xs:appinfo>~~

~~_____~~ ~~<xs:documentation>MS4 Inspection</xs:documentation>~~

~~_____~~ ~~</xs:annotation>~~

~~_____~~ ~~</xs:enumeration>~~

~~_____~~ ~~<xs:enumeration value="10">~~

~~_____~~ ~~<xs:annotation>~~

~~_____~~ ~~<xs:appinfo>MS4 Inspection</xs:appinfo>~~

~~_____~~ ~~<xs:documentation>Catch basin or manhole</xs:documentation>~~

~~_____~~ ~~</xs:annotation>~~

~~_____~~ ~~</xs:enumeration>~~

~~_____~~ ~~<xs:enumeration value="11">~~

~~_____~~ ~~<xs:annotation>~~

~~<xs:appinfo>MS4 Inspection</xs:appinfo>~~
~~<xs:documentation>Outfall</xs:documentation>~~
~~</xs:annotation>~~
~~</xs:enumeration>~~
~~<xs:enumeration value=""></xs:annotation>~~
~~</xs:enumeration>~~
~~<xs:enumeration value="9">~~
~~<xs:annotation>~~
~~<xs:appinfo>MS4 Inspection</xs:appinfo>~~
~~<xs:documentation>Catch basin or manhole</xs:documentation>~~
~~</xs:annotation>~~
~~</xs:enumeration>~~
~~<xs:enumeration value="10">~~
~~<xs:annotation>~~
~~<xs:appinfo>MS4 Inspection</xs:appinfo>~~
~~<xs:documentation>Outfall</xs:documentation>~~
~~</xs:annotation>~~
~~</xs:enumeration>~~
~~<xs:enumeration value="11">~~
~~<xs:annotation>~~
~~<xs:appinfo>MS4 Inspection</xs:appinfo>~~
[12">](#)
~~<xs:annotation>~~
[<xs:appinfo>MS4 Inspection</xs:appinfo>](#)
~~<xs:documentation>Stormwater BMP</xs:documentation>~~

~~</xs:annotation>~~
~~</xs:enumeration>~~
~~<xs:enumeration value="13">~~
~~<xs:annotation>~~
~~<xs:appinfo>MS4 Inspection</xs:appinfo>~~
~~</xs:annotation>~~
~~</xs:enumeration>~~
~~<xs:enumeration value="12">~~
~~<xs:annotation>~~
~~<xs:appinfo>MS4 Inspection</xs:appinfo>~~
~~<xs:documentation>Other [MS4 Inspection](#)</xs:documentation>~~
~~<xs:appinfo>Explain</xs:appinfo>~~
~~</xs:annotation>~~
~~</xs:enumeration>~~
~~<xs:enumeration value="14">~~
~~<xs:annotation>~~
~~<xs:documentation>Other [Inspection](#)</xs:documentation>~~
~~<xs:appinfo>Explain</xs:appinfo>~~
~~</xs:annotation>~~
~~</xs:enumeration>~~
~~<xs:enumeration value="15">~~
~~<xs:annotation>~~
~~</xs:annotation>~~
~~</xs:enumeration>~~
~~<xs:enumeration value="13">~~
~~<xs:annotation>~~
~~<xs:appinfo>Inspection</xs:appinfo>~~

```
<xs:documentation>Other</xs:documentation>
<xs:appinfo>Explain</xs:appinfo>
</xs:annotation>
</xs:enumeration>
</xs:restriction>
</xs:simpleType>
<xs:complexType name="AddressType">
  <xs:annotation>
    <xs:documentation>Conventional Street Address</xs:documentation>
  </xs:annotation>
  <xs:sequence>
    <xs:element name="Address" type="xs:string" />
    <xs:element name="City" type="xs:string" />
    <xs:element name="State" type="xs:string" />
    <xs:element name="PostalCode" type="xs:string" />
  </xs:sequence>
</xs:complexType>
<xs:simpleType name="IntersectionType">
  <xs:annotation>
    <xs:documentation>Intersection, Cross streets</xs:documentation>
  </xs:annotation>
  <xs:restriction base="xs:string" />
</xs:simpleType>
<xs:simpleType name="TaxParcelType">
  <xs:annotation>
```

```
<xs:documentation>Tax Parcel</xs:documentation>  
</xs:annotation>  
<xs:restriction base="xs:string" />  
</xs:simpleType>  
<xs:complexType name="LatLongType">  
<xs:annotation>  
<xs:documentation>Latitude Longitude pair, 6 decimal digits.</xs:documentation>  
</xs:annotation>  
<xs:sequence>  
<xs:element name="Latitude" type="LatNumber" />  
<xs:element name="Longitude" type="LongNumber" />  
</xs:sequence>  
</xs:complexType>  
<xs:simpleType name="LatNumber">  
<xs:annotation>  
<xs:documentation>Latitude, 6 decimal digits.</xs:documentation>  
</xs:annotation>  
<xs:restriction base="xs:decimal">  
<xs:totalDigits value="8" />  
<xs:fractionDigits value="6" />  
<xs:minInclusive value="-90" />  
<xs:maxInclusive value="90" />  
</xs:restriction>  
</xs:simpleType>  
<xs:simpleType name="LongNumber">
```

```
<xs:annotation>  
<xs:documentation>Longitude, 6 decimal digits.</xs:documentation>  
</xs:annotation>  
<xs:restriction base="xs:decimal">  
<xs:totalDigits value="9" />  
<xs:fractionDigits value="6" />  
<xs:minInclusive value="-180" />  
<xs:maxInclusive value="180" />  
</xs:restriction>  
</xs:simpleType>  
</xs:documentation>  
<xs:appinfo>Explain</xs:appinfo>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="14">  
<xs:annotation>  
<xs:documentation>Other</xs:documentation>  
<xs:appinfo>Explain</xs:appinfo>  
</xs:annotation>  
</xs:enumeration>  
</xs:restriction>  
</xs:simpleType>  
<xs:simpleType name="PollutantType">  
  <xs:restriction base="xs:string">  
    <xs:enumeration value="10">  
      <xs:annotation>
```

<xs:documentation>None found</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="1">

<xs:annotation>

2">

~~<xs:annotation>~~

<xs:documentation>Unconfirmed, unspecified, or not identified</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="2">

<xs:annotation>

<xs:appinfo>Solid waste</xs:appinfo>

<xs:documentation>Solid waste</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="3">

<xs:annotation>

<xs:appinfo>Solid waste</xs:appinfo>

<xs:documentation>Trash</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="4">

<xs:annotation>

<xs:appinfo>Solid waste</xs:appinfo>

```
<xs:documentation>Sediment/soil</xs:documentation>
</xs:annotation>
</xs:enumeration>
<xs:enumeration value="5">
  <xs:annotation>
    <xs:appinfo>Solid waste</xs:appinfo>
    <xs:documentation>Cement, concrete, lime, or plaster</xs:documentation>
  </xs:annotation>
</xs:enumeration>
<xs:enumeration value="6">
  <xs:annotation>
    <xs:appinfo>Solid waste</xs:appinfo>
    <xs:documentation>Yard waste or other plant or wood waste</xs:documentation>
  </xs:annotation>
</xs:enumeration>
<xs:enumeration value="7">
  <xs:annotation>
    <xs:appinfo>Solid waste</xs:appinfo>
    <xs:documentation>Food waste</xs:documentation>
  </xs:annotation>
</xs:enumeration>
<xs:enumeration value="8">
  <xs:annotation>
    <xs:appinfo>Solid waste</xs:appinfo>
    <xs:documentation>Pet waste or human waste</xs:documentation>
```

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="9">

<xs:annotation>

<xs:appinfo>Solid waste</xs:appinfo>

<xs:documentation>Carpet cleaning waste</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="10">

<xs:annotation>

<xs:appinfo>Solid waste</xs:appinfo>

<xs:documentation>Roofing materials</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="11">

<xs:annotation>

<xs:appinfo>Solid waste</xs:appinfo>

<xs:documentation>Road tar</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="12">

<xs:annotation>

<xs:appinfo>Liquid waste</xs:appinfo>

<xs:documentation>Liquid waste</xs:documentation>

</xs:annotation>

```
</xs:enumeration>  
<xs:enumeration value="13">  
<xs:annotation>  
<xs:appinfo>Liquid waste</xs:appinfo>  
    <xs:documentation>Vehicle oil, fuel, or other lubricant</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="14">  
<xs:annotation>  
<xs:appinfo>Liquid waste</xs:appinfo>  
13">  
<xs:annotation>  
<xs:appinfo>Liquid waste</xs:appinfo>  
    <xs:documentation>Antifreeze or other coolant</xs:documentation>  
</xs:annotation>  
</xs:enumeration>  
<xs:enumeration value="15">  
<xs:annotation>  
<xs:appinfo>Liquid waste</xs:appinfo>  
14">  
<xs:annotation>  
<xs:appinfo>Liquid waste</xs:appinfo>  
    <xs:documentation>Paint</xs:documentation>  
</xs:annotation>  
</xs:enumeration>
```


<xs:enumeration value="16">

<xs:annotation>

~~15">~~

~~<xs:annotation>~~

<xs:documentation>Sewage/septage</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="17">

<xs:annotation>

<xs:appinfo>Oil</xs:appinfo>

~~16">~~

~~<xs:annotation>~~

<xs:appinfo documentation>Oil</xs:appinfo documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="18">

<xs:annotation>

<xs:appinfo>Oil</xs:appinfo>

<xs:documentation>Vehicle oil, fuel, or other lubricant</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="19">

<xs:annotation>

<xs:appinfo>Oil</xs:appinfo>

~~17">~~

~~<xs:annotation>~~
~~<xs:appinfo>Oil</xs:appinfo>~~
<xs:documentation>Food preparation oil</xs:documentation>
</xs:annotation>

</xs:enumeration>

<xs:enumeration value="20">

~~<xs:annotation>~~
~~<xs:appinfo>Oil</xs:appinfo>~~

~~18"~~

~~<xs:annotation>~~
~~<xs:appinfo>Oil</xs:appinfo>~~

<xs:documentation>Heating oil or kerosene</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="21">

~~<xs:annotation>~~
~~<xs:appinfo>Chemical</xs:appinfo>~~
~~<xs:documentation>Chemical</xs:documentation>~~

~~</xs:annotation>~~

~~</xs:enumeration>~~

~~<xs:enumeration value="22">~~

~~<xs:annotation>~~

~~<xs:appinfo>19"~~

~~<xs:annotation>~~

~~<xs:appinfo>Chemical</xs:appinfo>~~

<xs:documentation>Household or industrial chemical</xs:documentation>

<xs:appinfo>Explain</xs:appinfo>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="23">

<xs:annotation>

<xs:appinfo>20">

~~<xs:annotation>~~

~~<xs:appinfo>Chemical</xs:appinfo>~~

<xs:documentation>Pesticide or herbicide</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="24">

<xs:annotation>

<xs:appinfo>Chemical</xs:appinfo>

21">

~~<xs:annotation>~~

~~<xs:appinfo>Chemical</xs:appinfo>~~

<xs:documentation>Fertilizer</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="25">

<xs:annotation>

<xs:appinfo>Foam</xs:appinfo>

<xs:documentation>Foam</xs:documentation>

~~</xs:annotation>~~

~~</xs:enumeration>~~

~~<xs:enumeration value="26">~~

~~<xs:annotation>~~

~~<xs:appinfo>22">~~

~~<xs:annotation>~~

~~<xs:appinfo>Foam</xs:appinfo>~~

<xs:documentation>Soap/detergent</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="27">

~~<xs:annotation>~~

~~<xs:appinfo>23">~~

~~<xs:annotation>~~

~~<xs:appinfo>Foam</xs:appinfo>~~

<xs:documentation>Fire-fighting foam</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="28">

~~<xs:annotation>~~

~~<xs:appinfo>24">~~

~~<xs:annotation>~~

~~<xs:appinfo>Foam</xs:appinfo>~~

<xs:documentation>Other or unknown foam</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="29">

<xs:annotation>

<xs:appinfo>Other</xs:appinfo>

<xs:documentation>Other</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="30">

<xs:annotation>

25">

<xs:annotation>

<xs:appinfo> <xs:appinfo>Other</xs:appinfo>

<xs:documentation>PCBs</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="31">

<xs:annotation>

<xs:appinfo>26">

<xs:annotation>

<xs:appinfo>Other</xs:appinfo>

<xs:documentation>Refrigerant</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="32">

<xs:annotation>

```
<xs:appinfo>27">
<del><xs:annotation>
<del><xs:appinfo>Other</xs:appinfo>
  <xs:documentation>Chlorinated water</xs:documentation>
</xs:annotation>
</xs:enumeration>
<xs:enumeration value="33">
  <del><xs:annotation>
  <del><xs:appinfo>28">
  <del><xs:annotation>
  <del><xs:appinfo>Other</xs:appinfo>
    <xs:documentation>Bacteria</xs:documentation>
  </xs:annotation>
  </xs:enumeration>
  <xs:enumeration value="2934">
    <xs:annotation>
      <xs:documentation>Other not listed</xs:documentation>
      <xs:appinfo>Explain</xs:appinfo>
    </xs:annotation>
  </xs:enumeration>
</xs:restriction>
</xs:simpleType>
<xs:simpleType name="SourceType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="40">
```

```
<xs:annotation>  
  <xs:documentation>Not applicable</xs:documentation>  
</xs:annotation>  
</xs:enumeration>
```

```
<xs:enumeration value="1">
```

```
<xs:annotation>
```

```
2">
```

```
<xs:annotation>
```

```
<xs:documentation>Not identified</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:enumeration>
```

```
<xs:enumeration value="2">
```

```
<xs:annotation>
```

```
3">
```

```
<xs:annotation>
```

```
<xs:documentation>Illicit connection</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:enumeration>
```

```
<xs:enumeration value="3">
```

```
<xs:annotation>
```

```
4">
```

```
<xs:annotation>
```

```
<xs:documentation>Dumping</xs:documentation>
```

```
</xs:annotation>
```

```
</xs:enumeration>
```

<xs:enumeration value="4">

<xs:annotation>

5">

<xs:annotation>

<xs:documentation>Spill</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="5">

<xs:annotation>

<xs:appinfo>Construction activity</xs:appinfo>

<xs:documentation>Construction activity</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="6">

<xs:annotation>

<xs:appinfo>Construction activity</xs:appinfo>

<xs:documentation>Construction BMP failure</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="7">

<xs:annotation>

<xs:documentation>Structural BMP failure</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="8">

<xs:annotation>

<xs:appinfo>Vehicle related</xs:appinfo>

<xs:documentation>Vehicle related</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="9">

<xs:annotation>

<xs:appinfo>Vehicle related</xs:appinfo>

<xs:documentation>Fueling</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="9">

~~<xs:annotation>~~

~~<xs:appinfo>Vehicle related</xs:appinfo>~~

<xs:documentation>Vehicle collision/accident</xs:documentation>

~~</xs:annotation>~~

~~</xs:enumeration>~~

~~<xs:enumeration value="10">~~

<xs:annotation>

<xs:appinfo>Vehicle related</xs:appinfo>

<xs:documentation>Vehicle collision/accident</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="11">

<xs:annotation>

<xs:appinfo>Vehicle related</xs:appinfo>

<xs:documentation>Auto repair</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="11">

~~<xs:annotation>~~

~~<xs:appinfo>Vehicle related</xs:appinfo>~~

~~<xs:documentation>Vehicle washing</xs:documentation>~~

~~</xs:annotation>~~

~~</xs:enumeration>~~

~~<xs:enumeration value="12">~~

<xs:annotation>

<xs:appinfo>Vehicle related</xs:appinfo>

<xs:documentation>Vehicle washing</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="13">

<xs:annotation>

<xs:appinfo>Vehicle related</xs:appinfo>

<xs:documentation>Vehicle leakage/fluids</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="14">

<xs:annotation>

<xs:appinfo>Improper business operation or activity</xs:appinfo>

13">

~~<xs:annotation>~~
<xs:appinfo:documentation>Improper business operation or activity</xs:appinfo:documentation>
</xs:annotation>
</xs:enumeration>
<xs:enumeration value="15">
<xs:annotation>
<xs:appinfo>Improper business operation or activity</xs:appinfo>
<xs:documentation>Equipment cleaning</xs:documentation>
</xs:annotation>
</xs:enumeration>
<xs:enumeration value="16">
<xs:annotation>
<xs:appinfo>Improper business operation or activity</xs:appinfo>
14">
<xs:annotation>
<xs:appinfo>Improper business operation or activity</xs:appinfo>
<xs:documentation>Pressure washing</xs:documentation>
</xs:annotation>
</xs:enumeration>
<xs:enumeration value="17">
<xs:annotation>
<xs:appinfo>Improper business operation or activity</xs:appinfo>
15">
<xs:annotation>
<xs:appinfo>Improper business operation or activity</xs:appinfo>

<xs:documentation>Leaking or abandoned container/dumpster</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="18">

<xs:annotation>

<xs:appinfo>Improper business operation or activity</xs:appinfo>

16">

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

<xs:documentation>Drive-thru</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="19">

<xs:annotation>

<xs:appinfo>Improper business operation or activity</xs:appinfo>

17">

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

<xs:documentation>Mobile business</xs:documentation>

<xs:appinfo>Explain</xs:appinfo>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="20">

<xs:annotation>

<xs:appinfo>Improper business operation or activity</xs:appinfo>

~~18"~~

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

<xs:documentation>Retail operations</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="21">

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

~~19"~~

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

<xs:documentation>Restaurant</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="22">

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

~~20"~~

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

<xs:documentation>Non-emergency firefighting or training</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="23">

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

~~<xs:documentation>21">~~

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

<xs:documentation>Logging</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="24">

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

~~22">~~

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

<xs:documentation>Livestock</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="25">

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

~~<xs:documentation>23">~~

~~<xs:annotation>~~

~~<xs:appinfo>Improper business operation or activity</xs:appinfo>~~

~~<xs:documentation>Other </xs:documentation>~~

<xs:appinfo>Explain</xs:appinfo>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="26">

<xs:annotation>

<xs:appinfo>Allowable discharge</xs:appinfo>

24">

<xs:annotation>

<xs:appinfo:documentation>Allowable discharge</xs:appinfo:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="27">

<xs:annotation>

<xs:appinfo>Allowable discharge</xs:appinfo>

<xs:documentation>Diverted stream flow</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="28">

<xs:annotation>

<xs:appinfo>Allowable discharge</xs:appinfo>

25">

<xs:annotation>

<xs:appinfo>Allowable discharge</xs:appinfo>

<xs:documentation>Flow from riparian habitat or wetland</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="29">

~~<xs:annotation>~~

~~<xs:appinfo>Allowable discharge</xs:appinfo>~~

~~26">~~

~~<xs:annotation>~~

~~<xs:appinfo>Allowable discharge</xs:appinfo>~~

<xs:documentation>Uncontaminated ground water or spring water</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="30">

~~<xs:annotation>~~

~~<xs:appinfo>Allowable discharge</xs:appinfo>~~

~~27">~~

~~<xs:annotation>~~

~~<xs:appinfo>Allowable discharge</xs:appinfo>~~

<xs:documentation>Foundation or footing drain</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="31">

~~<xs:annotation>~~

~~<xs:appinfo>Allowable discharge</xs:appinfo>~~

~~28">~~

~~<xs:annotation>~~

~~<xs:appinfo>Allowable discharge</xs:appinfo>~~

<xs:documentation>Uncontaminated water from crawl space pump</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="32">

<xs:annotation>

<xs:appinfo>Allowable discharge</xs:appinfo>

~~29"~~

~~<xs:annotation>~~

~~<xs:appinfo>Allowable discharge</xs:appinfo>~~

<xs:documentation>Air conditioning condensation</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="33">

<xs:annotation>

~~30"~~

~~<xs:annotation>~~

<xs:appinfo>Allowable discharge</xs:appinfo>

<xs:documentation>Irrigation water from agricultural source</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="3134">

<xs:annotation>

<xs:appinfo>Allowable discharge</xs:appinfo>

<xs:documentation>Emergency firefighting</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="35">

<xs:annotation>

<xs:appinfo>Conditionally allowed discharge</xs:appinfo>

~~32">~~

~~<xs:annotation>~~

<xs:appinfodocumentation>Conditionally allowed discharge</xs:appinfodocumentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="36">

<xs:annotation>

<xs:appinfo>Conditionally allowed discharge</xs:appinfo>

<xs:documentation>Potable water</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="37">

<xs:annotation>

~~33">~~

~~<xs:annotation>~~

<xs:appinfo>Conditionally allowed discharge</xs:appinfo>

<xs:documentation>Water line flushing or testing</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="34">

<xs:annotation>

38">

<xs:annotation>

<xs:appinfo>Conditionally allowed discharge</xs:appinfo>

<xs:documentation>Lawn watering or other irrigation</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="39">

<xs:annotation>

<xs:appinfo>Conditionally allowed discharge</xs:appinfo>

35">

<xs:annotation>

<xs:appinfo>Conditionally allowed discharge</xs:appinfo>

<xs:documentation>Dechlorinated pool/spa water</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="40">

<xs:annotation>

<xs:appinfo>Conditionally allowed discharge</xs:appinfo>

36">

<xs:annotation>

<xs:appinfo>Conditionally allowed discharge</xs:appinfo>

<xs:documentation>Street/sidewalk wash water</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="41">

<xs:annotation>

<xs:appinfo>Surface runoff37>

~~<xs:annotation>~~

</xs:appinfo>

<xs:appinfo>documentation>Surface runoff</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="42">

<xs:annotation>

- <xs:appinfo>Surface runoff</xs:appinfo>

<xs:documentation>Due to drainage or grade conditions</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="38">

~~<xs:annotation>~~

43">

<xs:annotation>

<xs:appinfo>Surface runoff</xs:appinfo>

<xs:documentation>Stormwater or flood water</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="39">

~~<xs:annotation>~~

44">

<xs:annotation>

<xs:appinfo>Surface runoff</xs:appinfo>

<xs:documentation>Groundwater pumping</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="40">

~~<xs:annotation>~~

45">

<xs:annotation>

<xs:appinfo>Surface runoff</xs:appinfo>

<xs:documentation>Broken or clogged water or sewer line</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="41">

~~<xs:annotation>~~

~~<xs:appinfo>Surface runoff 46">~~

<xs:annotation>

<xs:appinfo>Surface runoff</xs:appinfo>

<xs:documentation>Other</xs:documentation>

<xs:appinfo>Explain</xs:appinfo>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="47">

<xs:annotation>

42">

~~<xs:annotation>~~

<xs:documentation>Septic system</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="4348">

<xs:annotation>

<xs:documentation>Other</xs:documentation>

<xs:appinfo>Explain</xs:appinfo>

</xs:annotation>

</xs:enumeration>

</xs:restriction>

</xs:simpleType>

<xs:simpleType name="TraceType">

<xs:restriction base="xs:string">

<xs:enumeration value="10">

<xs:annotation>

<xs:documentation>Not applicable</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="1">

<xs:annotation>

2">

<xs:annotation>

<xs:documentation>Visual observation</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="3">

<xs:annotation>

2">

<xs:annotation>

<xs:documentation>Smell/odor</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="3">

<xs:annotation>

4">

~~<xs:annotation>~~

<xs:documentation>Map analysis</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="4">

<xs:annotation>

5">

~~<xs:annotation>~~

<xs:documentation>Further inspection or reconnaissance</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="5">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Indicator testing</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="6">

<xs:annotation>
 <xs:appinfo>Indicator testing</xs:appinfo>
 <xs:documentation>Flow/discharge</xs:documentation>
</xs:annotation>

</xs:enumeration>

<xs:enumeration value="7">

<xs:annotation>
 <xs:appinfo>Indicator testing</xs:appinfo>
 <xs:documentation>Sheen/oil</xs:documentation>
</xs:annotation>

</xs:enumeration>

<xs:enumeration value="8">

<xs:annotation>
 <xs:appinfo>Indicator testing</xs:appinfo>
 <xs:documentation>Floatables</xs:documentation>
</xs:annotation>

</xs:enumeration>

<xs:enumeration value="9">

<xs:annotation>
 <xs:appinfo>Indicator testing</xs:appinfo>
 <xs:documentation>Detergent or surfactants</xs:documentation>
</xs:annotation>

</xs:enumeration>

<xs:enumeration value="10">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>
<xs:documentation>Ammonia</xs:documentation>
</xs:annotation>
</xs:enumeration>

<xs:enumeration value="11">
<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>
<xs:documentation>Color</xs:documentation>
</xs:annotation>
</xs:enumeration>

<xs:enumeration value="12">
<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>
<xs:documentation>Odor</xs:documentation>
</xs:annotation>
</xs:enumeration>

<xs:enumeration value="13">
<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>
<xs:documentation>pH</xs:documentation>
</xs:annotation>
</xs:enumeration>

<xs:enumeration value="14">
<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Temperature</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="15">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Turbidity</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="16">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Hardness</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="17">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Nitrates</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="18">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Potassium</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="19">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Specific conductivity</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="20">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Bacteria </xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="21">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Chloride/chlorine</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="22">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Fluoride</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="23">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Carbon monoxide</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="24">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Hydrogen sulfide</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="25">

<xs:annotation>

<xs:appinfo>Indicator testing</xs:appinfo>

<xs:documentation>Other</xs:documentation>

<xs:appinfo>Explain</xs:appinfo>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="26">

<xs:annotation>

<xs:documentation>Dye testing</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="27">

<xs:annotation>

<xs:documentation>Pressure testing</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="28">

<xs:annotation>

<xs:documentation>Smoke testing</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="29">

<xs:annotation>

<xs:documentation>Video inspection</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="30">

<xs:annotation>

<xs:documentation>Canine detection</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="31">

<xs:annotation>

<xs:documentation>Optical brightener</xs:documentation>

</xs:annotation>

</xs:enumeration>

```
<xs:enumeration value="32">  
  <xs:annotation>  
    <xs:documentation>Sand bagging</xs:documentation>  
  </xs:annotation>  
</xs:enumeration>
```

```
<xs:enumeration value="33">  
  <xs:annotation>  
    <xs:documentation>Other</xs:documentation>  
    <xs:appinfo>Explain</xs:appinfo>  
  </xs:annotation>  
</xs:enumeration>
```

```
</xs:restriction>  
</xs:simpleType>  
<xs:simpleType name="CorrectionType">
```

```
<xs:restriction base="xs:string">  
  <xs:enumeration value="10">  
    <xs:annotation>  
      <xs:documentation>No action needed</xs:documentation>  
      <xs:appinfo>Explain</xs:appinfo>  
    </xs:annotation>  
  </xs:enumeration>
```

```
<xs:enumeration value="21">  
  <xs:annotation>  
    <xs:documentation>Clean-up</xs:documentation>  
  </xs:annotation>
```

</xs:enumeration>

<xs:enumeration value="3">

~~<xs:annotation>~~

2">

<xs:annotation>

<xs:documentation>Education/technical assistance</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="3">

<xs:annotation>

4">

~~<xs:annotation>~~

<xs:documentation>Add or modify operational BMP</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="4">

<xs:annotation>

5">

<xs:annotation>

<xs:documentation>Add or modify structural BMP</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="5">

<xs:annotation>

<xs:appinfo>Enforcement</xs:appinfo>

<xs:documentation>Enforcement</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="6">

<xs:annotation>

<xs:appinfo>Enforcement</xs:appinfo>

<xs:documentation>Verbal notice</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="7">

<xs:annotation>

<xs:appinfo>Enforcement</xs:appinfo>

<xs:documentation>Written warning</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="8">

<xs:annotation>

<xs:appinfo>Enforcement</xs:appinfo>

<xs:documentation>Correction notice</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="9">

<xs:annotation>

<xs:appinfo>Enforcement</xs:appinfo>

<xs:documentation>Stop work order</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="10">

<xs:annotation>

<xs:appinfo>Enforcement</xs:appinfo>

<xs:documentation>Legal notice</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="11">

<xs:annotation>

<xs:appinfo>Enforcement</xs:appinfo>

<xs:documentation>Penalty or fine</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="12">

<xs:annotation>

<xs:documentation>Referred to other agency or department</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="13">

<xs:annotation>

<xs:documentation>Follow-up or further investigation</xs:documentation>

</xs:annotation>

</xs:enumeration>

<xs:enumeration value="14">

<xs:annotation>

```
<xs:documentation>Problem not abated</xs:documentation>
```

```
<xs:appinfo>Explain</xs:appinfo>
```

```
</xs:annotation>
```

```
</xs:enumeration>
```

```
<xs:enumeration value="15">
```

```
<xs:annotation>
```

```
<xs:documentation>Other</xs:documentation>
```

```
<xs:appinfo>Explain</xs:appinfo>
```

```
</xs:annotation>
```

```
</xs:enumeration>
```

```
</xs:restriction>
```

```
</xs:simpleType>
```

```
<xs:simpleType name="SqlDate">
```

```
<xs:annotation>
```

```
<xs:documentation>xs:date limited to SQL Server's operating range</xs:documentation>
```

```
</xs:annotation>
```

```
<xs:restriction base="xs:date">
```

```
<xs:minInclusive value="1753-01-01" />
```

```
<xs:maxInclusive value="9999-12-31" />
```

```
</xs:restriction>
```

```
</xs:simpleType>
```

```
</xs:schema>
```

Example (IDDE.xml)

```
<?xml version="1.0" encoding="utf-8"?>
```

```
<IDDEEvents>
```

```
<IDDEEvent>
```

```
<DateIncident>2018-01-01</DateIncident>
```

```
<IncidentId>IncidentId1</IncidentId>
```

```
—<Jurisdiction>WAR045000</Jurisdiction>
—</IDDEEvent>
—<IDDEEvent>
—<Notes>Notes2</Notes>
—<Corrections>
—<Correction type="1">
—</Correction>
—</Corrections>
—<Traces>
—<Trace type="1">
—</Trace>
—</Traces>
—<Sources>
—<Source type="1">
—</Source>
—</Sources>
—<Pollutants>
—<Pollutant type="1">
—</Pollutant>
—</Pollutants>
—<Location>
—<Intersection>Martin Way and Desmond Drive</Intersection>
—</Location>
—<G3_g3="false" />
—<Discovereds>
—<Discovered type="1">
—</Discovered>
—</Discovereds>
—<Discharge>
—<Unknown />
—</Discharge>
—<Resolved final="true">2018-08-15</Resolved>
—<DateResponseBegin>2018-08-10</DateResponseBegin>
—<DateReported>2018-08-09</DateReported>
—<DateIncident>2018-08-08</DateIncident>
—<IncidentId>IncidentId2</IncidentId>
—<Jurisdiction>WAR044000</Jurisdiction>
—</IDDEEvent>
—<IDDEEvent>
—<Notes>Notes3</Notes>
—<Corrections>
—<Correction type="3">
—</Correction>
—<Correction type="14">
—<Explain>Explain correction</Explain>
—</Correction>
```

```
—<Correction type="13">
—</Correction>
—</Corrections>
—<Traces>
—<Trace type="7">
—<Explain>Explain7</Explain>
—</Trace>
—<Trace type="25">
—<Explain>Explain trace indicator</Explain>
—</Trace>
—<Trace type="33">
—<Explain>Explain trace</Explain>
—</Trace>
—</Traces>
—<Sources>
—<Source type="17">
—<Explain>Explain source</Explain>
—</Source>
—<Source type="8">
—<Explain>Explain8</Explain>
—</Source>
—<Source type="9">
—<Explain>Explain9</Explain>
—</Source>
—</Sources>
—<Pollutants>
—<Pollutant type="7">
—</Pollutant>
—<Pollutant type="8">
—</Pollutant>
—<Pollutant type="19">
—<Explain>Explain pollutant</Explain>
—</Pollutant>
—</Pollutants>
—<Location>
—<LatLong>
—<Latitude>47.99</Latitude>
—<Longitude>127.999</Longitude>
—</LatLong>
—<Address>
—<Address>300 desmond drive</Address>
—<City>olympia</City>
—<State>wa</State>
—<PostalCode>98503</PostalCode>
—</Address>
—</Location>
```

—<G3 g3="true" erts_id="erts_id3" />
—<Discovereds>
—<Discovered type="7">
—</Discovered>
—<Discovered type="8">
—</Discovered>
—<Discovered type="14">
—<Explain>Explain discovered</Explain>
—</Discovered>
—</Discovereds>
—<Discharge>
—<Yes type="3" frequency="2" waterbody="waterbody3" volume="500" />
—</Discharge>
—<Resolved final="true" transferred="transferred3">1753-02-02</Resolved>
—<DateResponseBegin>1753-02-02</DateResponseBegin>
—<DateReported>1753-02-02</DateReported>
—<DateIncident>1753-02-02</DateIncident>
—<IncidentId>IncidentId3</IncidentId>
—<Jurisdiction>WAR046000</Jurisdiction>
—</IDDEEvent>
</IDDEEvents>

S5.C.11. Education and Outreach

As proposed by Ecology:

	The SWMP shall include an education and outreach program designed to:			
a.i.(a)	BUILD AWARENESS	To build general awareness, Permittees shall target the following audiences and subject areas:		
	Subject Areas			
Audience	1) General impacts of stormwater on surface waters.	2) Impacts from impervious surfaces.	3) LID principles and LID BMPs.	4) Opportunities to become involved in stewardship activities.
General Public	General Public	General Public	General Public	General Public
School Age Children	School Age Children	School Age Children	School Age Children	School Age Children
Overburdened Communities	Overburdened Communities	Overburdened Communities	Overburdened Communities	Overburdened Communities
Businesses	Businesses	Businesses	Businesses	Businesses
Home based businesses	Home based businesses	Home based businesses	Home based businesses	Home based businesses
Mobile businesses	Mobile businesses	Mobile businesses	Mobile businesses	Mobile businesses
a.i.(b)	BUILD AWARENESS			
	Subject Areas			
Audience	1) Technical standards for stormwater site and erosion control plans.	2) LID principles and LID BMPs.	3) Stormwater treatment and flow control BMPs/facilities.	
Engineers	Engineers	Engineers	Engineers	
Contractors	Contractors	Contractors	Contractors	
Developers	Developers	Developers	Developers	
Land Use Planners	Land Use Planners	Land Use Planners	Land Use Planners	

City of Tacoma Proposal

a.i.(a)	BUILD AWARENESS	To build general awareness, Permittees shall target the following audiences and subject areas:		
	Subject Areas			
	1) General impacts of stormwater on surface waters.	2) Impacts from impervious surfaces.	3) LID principles and LID BMPs.	4) Opportunities to become involved in stewardship activities.
Audience	General Public	General Public	General Public	General Public
	School Age Children	School Age Children	School Age Children	
	Overburdened Communities	Overburdened Communities	Overburdened Communities	Overburdened Communities
	Businesses	Businesses	Businesses	Businesses
				remove because S5.C.11.a.iii discusses stewardship - make that inclusive. Should not require targeting school age children because they need parental permission to participate.
a.i.(b)	BUILD AWARENESS			
	Subject Areas			
	1) Technical standards for stormwater site and erosion control plans.	2) LID principles and LID BMPs.	3) Stormwater treatment and flow control BMPs/facilities.	
Audience	Engineers	Engineers	Engineers	
	Contractors	Contractors	Contractors	
	Developers	Developers	Developers	
		Land Use Planners	Land Use Planners	