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Global Comment	Shifting from SIC to NAICS Groups	This is a welcomed improvement to the permit.
All Pages	Permit number in header please	Insert Permit Condition Number in the header, that is very helpful tracking where in the permit the reader is looking
S1.	Table 1: Activies Requiring Permit Coverage	Skiing Facilities NAICS 713920 should be included. Alpine ski areas have large maintaince facilities with heavy equipment that they fuel and repair onsite. There are acres of unpaved parking that contribute signifcant turbidity and sediment to the surface waters they discharge to, along with trash and oil. The piles of snow from plowing are full of trash, oil and dirt and the meltwater also carries these contaminates to surface waters. Deicing chemicals may also be used. Adding: de-icing salts in particular will interfere with stormwater treatment facilities' ability to capture heavy metals, and can result in flushing slugs of squestered heavy metals.
Page 4, S1.B.1.	Is a ***significant contributor of pollutants*** ...	The definition on page 69 of the Draft permit states that this "means a facility determined by Ecology to be a contributor of a significant amount(s) of a pollutant(s) to waters of the State." However, significant amount is not defined, what does Ecology mean? How does Ecology determine a facility meets this criteria? How is that facility notified and how does it appeal that determination? Recommend Ecology detail this process in a guidance document and reference that in this section of the permit.
Page 4, C.3.	"Industrial facilities that discharge stormwater only to groundwater (e.g., on-site infiltration)with no discharge to surface waters of the stateState under any condition, provided the facility doesn't meet the requirements of S1.B.1." **S1.B.** Significant Contributors of Pollutants Ecology may require a facility to obtain coverage under this permit if Ecology determines the facility: 1. Is a significant contributor of pollutants to waters of the stateState, including groundwatergroundwater; **C. Facilities Not Required to Obtain Coverage** Ecology does not require the types of facilities listed below to obtain coverage under this permit, unless determined to be a significant contributor of pollutants. 3. Industrial facilities that discharge stormwater only to groundwater (e.g., on-site infiltration)with no discharge to surface waters of the ~~state~~State under any condition, provided the facility doesn't meet the requirements of S1.B.1. **E. Discharges to Ground** 1. For sites ~~that~~with a discharge point to ~~both surface water and ground water,~~ groundwater the terms and conditions of this permit shall apply t~~o all ground water discharges.~~	Underlined text is confusing as written. I'm pretty sure intent is to say, 'provided the facility is not a significant contributor of pollutants to waters of the State, including groundwater, per S1.B.1'. Or perhaps re-write to say : 3. Industrial facilities that discharge stormwater only to groundwater (e.g., on-site infiltration) with no discharge to surface waters of the State under any condition, provided thefacility doesn't meet the requirements of S1.B.1. But that would likely generate a lot of questions around .. what if my site discharges to groundwater ..? There appears to be confusion between the C. & E. sections. Ecology has said Discharges to Ground: C.3. Do not require coverage. E.1. For sites with a discharge point to groundwater the terms and conditions of this permit shall apply. Proposed: • Clarification between the sections. Delete E.1. • C.3. '.... , provided the facility is not a significant contributor of pollutants to waters of the State, including groundwater, per S1.B.1'.
Page 4, C.3.	"Also see S.1.E.1"	Recommend modifying this to say, "Also, conditions in S.1.E. must be met"
Page 4, C.6	"Any land application site used for the beneficial use of industrial or municipal wastewaterfor agricultural activities or when applied for landscaping purposes at agronomic rates."	This refers to municipal wastewater, not municipal sludge or biosolids -so this is not an allowance related to WAC 173-308; rather, it is related to use of 'reclaimed water'. This needs to be clarified, stipulating that: 1.) The discharge is subject to and must meet the requirements of the Reclaimed Water Rule, Chapter 173-219 WAC. 2.) The discharge is subject to a Reclaimed Water Permit persuant to Chapter 173-219 WAC, which requires review and approval by the WA State Department of Ecology AND the Department of Health.

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Pages 4 - 5, S1.C.8	S1.C. Facilities Not Required to Obtain Coverage 8. Any inactive coal mining operation if: a. The performance bond issued to the facility by the appropriate Surface Mining Control and Reclamation Act (SMCRA) authority has been released from applicable state or federal reclamation requirements after December 17, 1990. b. The mine does not have a discharge of stormwater that comes in contact with any overburden, raw material, intermediate products, finished products, byproducts, or waste products located on the site of the facility.	1.) Are conditions a. and b. AND conditions? It looks like they ought to be. Recommend inserting the word AND, at the end of condition a. 2.) Recommend adding a condition c., following b. (with another AND, after b.). Condition c. should be: 'c. The mine is not subject to stormwater ingress that could result in leachate from the mine itelf into groundwater or surface water.'
Page 5, S1.C.9	Closed landfills that are capped and stabilized, in compliance with Chapter 173-304 WAC,…	Closed landfills that are capped and stabilized, in compliance with Chapter 173-304 WAC or Chapter 173-351 WAC, …
Page 5 S1.D.1	Airports with more than 10,000 annual jet departures	Is the exclusion of Airports with more than 10,000 annual jet departures mean that these airports must apply for a general permit and not an individual permit?
Page 6. S1.E.1	1. For sites with a discharge point to groundwater the terms and conditions of this permit shall apply. **Changed from:** 1. For sites that discharge to both surface water and groundwater, the terms and conditions of this	Coverage is not required per S1.C.3 Facilities Not Required to Obtain Coverage for discharges only to groundwater that are not deemed by Ecology to be a significant contributor. Recommend reverting to 2015 permit language, which draws a clear distinction between sites that discharge only to ground and those that discharge to both surface and ground. Proposed Language: **1. For sites that discharge to both suface water and groundwater, the terms and conditions of this permit shall apply.** OR **1. For sites that discharge to groundwater, the terms and conditions of this permit DO NOT apply as per S1.C.3. Facilities that have no surface water discharge and are not considered a *significant contributor* per S1.B.1. are not required to be covered by the Industrial Stormwater General Permit.** For reference: S1.C. 3. Industrial facilities that discharge stormwater only to groundwater (e.g., on-site infiltration) with no discharge to surface waters of the stateState under any condition, provided the facility doesn't meet the requirements of S1.B.1. *(Significant contrib)*
Page 11, S3A.3.c.	3.Update of the SWPPP c. If a Permittee covered under the ~~2010~~2015 ISGP needs to update their SWPPP to be consistent with the ~~2015~~2020 ISGP, the update shall be completed by January 30, ~~2015~~2020.	Change deadline for updates to 6 months after ISGP approved.
Page 10 S3.A.1	qualified personnel	Add a note that requirements of a 'qualified personnel' to develop the SWPPP are in Appendix 2.
Page 11, S3A.3(a)	"local regulatory authority"	"state" should not be deleted as indicated by Ecology's strikeout. WA State Department of Health and Department of Fish and Wildlife, and possibly Department of Natural Resources may one or another or all have as much interest and overlapping authority with local jurisdictions.
Page 12, S3B.1	"The site map shall identify:"	1. The following information shall be provided on one or more site maps.

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Page 12, S3.B.1(a) & (b)	a. The scale or include relative distances... b. The size of the property in acres.	Agree that scale is an important element of the site map. Site acreage, however, does not need to be on the map, particularly if it is contained elsewhere in the SWPPP (say, on a site info page with address, etc.). Recommend moving acreage requirement to S3.B.2(a) (facility description).
Page 12, S3B.1. (c)	"The location and extent of significant structures and impervious surfaces.	Please define "significant structures" . All significant --buildings-- should be identified, especially as they ask for conveyance details under S3B.1.(i). Vehicle Locations of all stormwater conveyances including ditches, pipes, swales, etc.
Page 12 S3B.1.(e)	"Locations of all structural control measures."	This term is not defined. However, on page 70 of the permit, "Structural Source Control BMPs are defined. Suggest changing the language here to "Locations of all Structural Source Control BMPs."
Page 12 S3B.1.(i)	"Locations of all stormwater conveyances including ditches, pipes, swales, etc."	Depending on the definition of "significant structures" in S3B.1.(c) above, specifically whether or not stormwater streatment structures are considered "significant structures", consider revising this to read: "Locations of all stormwater treatment structures and conveyances including ditches, pipes, catch basins, vaults, ponds, swales, etc."
Page 13 S3B.1.(p)	"Locations and sources of run-on to your site from adjacent properties that may contain pollutants.	Make note of these sources in a highly visible place such as the site map. Off-site sources can be appreciable and should be detailed and addressed in the SWPPP.
Page 13 S3B.1.(m)	m. Locations of stormwater inlets and outfalls with a unique identification number for each sampling point, indicating any that are identified as substantially identical, and identify, by name, any other party other than the Permittee that owns any stormwater drainage or discharge structures.	Please clarifiy the concern about stormwater going to a CSO wrt to ISGP, other than reporting? Concern with backflow ?
Page 13 S3B.2.(b)	None	Consider adding sub-section ix to read: "Off-site sources of pollution."
Page 15 S3B.4.b.i.2.d	"…storm proof…"	Ecology does need to define the term "storm proof".
Page 16 S3B.4.b.i.4.a	"or use UL Approved double-walled tanks"	Where Ecology cites a regulatory requirement, specifics should be included. In this case the UL specification for above-ground double-wall tanks is "UL 142", and the text should reflect that.
Page 16, S3.B.4.b.i.4.c.i	"Spill prevention, containment, and countermeasures plan (scup)…"	Please provide clarification. This entire section is confusing. Here are some examples of why it's confusing: The second sentence suggests some facilities categorized in the prior c) paragraph may not have a SPCC plan. What is the basis for 15 gallons? What is the rationale for that being deemed sufficient? For facilities with a SPCC plan, assuming "the minimum anticipated spill" means 'in excess of 15 gallons', why the minimum? Why not e.g. 'average anticipated spill'? How does a business determine numerically what is anticipated? Ecology needs to provide some guidance on this.
Page 16, S3.B.4.b.i.4.c.v	"Two 5 gallon buckets with lids"	This is inconsistent with the minimum requirement under S3.B.4.b.i.4.c.i for a minimum absorbent capability of 15 or more gallons. There should be sufficient bucket capacity for absorbent + spilled fluid. (needs to be determined by experiment: 15 gallons of fluid + absorbent is likely to require more than three 5 gallon buckets). Also, need to specify that the bucket material must be inert/stable/unaffected by contact with petroleum hydrocarbons.
Page 21, S4.B.1.b	"…First fall storm event means the first time on or after September 1st of…"	b. Permittees shall sample the stormwater discharge from the first fall storm event each year. "First fall storm event" means the first time during the 3rd or 4th quarter that precipitation occurs and results in a stormwater discharge from a facility after a period of more than 30 days of no rain.
Page 21, S4B2	Section called "Sample Location"	Recommend changing this section to "Steps to Identify Sample Locations". Then S4B3 makes more sense.
Page 22, S4B.2.d.	d. The Permittee shall notify Ecology of any changes or updates to sample locations, discharge points, and/or outfalls. The Permittee may be required to provide additional information to Ecology prior to changing sampling locations.	This language is redundant and thus is not needed. Move to S4.B.3(a) S4.B.3. Substantially Identical Outfalls Or clarify that the permittee needs to submit an "Industrial Stormwater General Permit Discharge/Sample Point Update Form" to Ecology here instead of under S4.B.3(a); it makes
Page 22, S4.B.3	Substantially identical outfalls	Outfall in the title should be changed to "discharge point" for consistency of language.

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Page 22, S4.B.4.d	Ecology uses the word, "it" d. An explanation of why it could not collect a sample within the first 12 hours of a stormwater discharge event, if it was not possible. Or, if it is unknown, an explanation of why it ~~doesn't know~~is unknown if a sample was collected within or outside the first 12 hours of stormwater discharge.	We guess this means permittee. Ecology should clarify this section to replace "it" with "permittee."
Page 23, S4.B.7.c	Consistent attainment requires sampling one time per year.	The annual sample in the 4th quarter for consistent attainment appears at odds with the requirement to sample first flush. Per S4B1(b), permittees have to sample first flush. Clarify that permittees in consistent attainment don't have to sample first flush, rather must only comply with S4B7 requirements for annual sampling. We prefer that Consistent Attainment sampling occur in the 4th quarter. There is confusion/conflict between req'd 4th qtr. sample and moving 1st flush to Sept. Maybe recommend annual sampling must occur during wet season (e.g., Q4-Q1 or Sept-Feb if monitoring period shifted per earlier comment).
Page 23, S4.B.7.c	"Reduced Sampling Due to Consistent Attainment"	It takes 8 quarters of sampling to reach consistent attainment and only one quarter to lose it. It is a disincentive for treatment system design. If a facility will not be relieved of quarterly sampling after 8 quarters of clean results, then the permittee might design the treatment system to 75% effective instead of 90% effective. To do otherwise without benefit of a sampling vacation, means sunk treatment costs for no benefit. Disappointed to see this incentive diminished. Given limited resources, sampling suspension at CA sites frees up resources to apply at sites with ongoing WQ challenges where there is greater need. Just to clarify, if consistant attainment was achieved during the 2015 permit permit, does it carryover into the 2019 permit ? Also, is the once per year always once per year always the first flushenven the first flush may not be well defined. After three years, the sampling can be reduced to 0 for those parameters, but only after a request for a permit modification?
Page 24, S4.D.2	2. Turbidity and pH are exempt from this requirement, unless the laboratory must be registered or accredited for any other parameter.	Recommend deletion of S4.D.2 altogether, since turbidity and pH methods are already specified in Table 2.
Page 24, S5A.3	S5.A.3. If a Permittee's discharge exceeds a benchmark listed in ~~Table 2,~~Table 2, the Permittee shall take the actions specified in Condition S8. Permittees sampling more than once per quarter shall average the sample results for each parameter (except pH and "visible oil sheen")) and compare the average value to the benchmark to determine if the discharge has exceeded a benchmark value. However, if Permittees collect more than one sample during a 24-hour period, they must first calculate the daily average of the individual grab sample results collected during that 24-hour period; then use the daily average to calculate a quarterly average. S4.B.1.f. Permittees monitoring more than once per quarter shall average all of the monitoring results for each parameter (except pH and visible oil sheen) and compare the average value to the benchmark value. However, if Permittees collect more than one sample during a 24-hour period, they must first calculate the daily average of the individual grab sample results collected during that 24-hour period; then use the daily average to calculate a quarterly average.	There is duplicative language after the first sentence. Recommend striking the duplicative language as it is already stated in S4.B.1.f
page 25, S5B table 2	Footnote dropped the following sentence: If the Permittee is unable to obtain the required QL due to matrix effects, the Permittee must report the matrix-specific method detection level (MDL) and QL on the DMR.	Recommend restoring this sentence or clarifying why it was dropped and does not show up on the redline nor is it discussed in the FAQ.
page 25, S5.B	Table 2	Recommend adding dissolved metals analysis, so reporting is for both total and dissolved. The benchmark would still be based on total metals.

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S6.C.1		We believe Ecology should consider modifying the existing S6.D provisions as they do not address the TMDL scenario where IW contributes to the listed parameter, no WLA or monitoring specified for IW, and IW is specifically excluded in the TMDL. Such provision would clarify what terms and conditions apply to dischargers in this situation. We suggest the following underlined modification to S6.D.5: Where Ecology has not established a TMDL wasteload allocation for industrial stormwater discharges for a parameter present in the Permittee's discharge, but has not excluded these discharges or the TMDL has specifically excluded IW discharges, Ecology will assume the Permittee's compliance with the terms and conditions of this permit complies with the approved TMDL.
page 25 S5.B	Table 2, footnote c. "resolution not greater than"	Ambiguous. "resolution not greater than"... Unlikely, to interpret as such, but literally as written this says synonymously 'resolution *not better than*'. To remove all ambiguity, recomment modifying the text to say: "resolution numerically not greater than"; OR "**resolution of ± 0.5 SU or better**"
Page 26, S5.B.2	S5.B.2. If a discharge exceeds a benchmark listed Table 3, the Permittee shall take the actions specified in Condition S8. Permittees sampling more than once per quarter shall average the sample results for each parameter and compare the average value to the benchmark to determine if it the discharge has exceeded a benchmark. However, if Permittees collect more than one sample during a 24-hour period, they must first calculate the daily average of the individual grab sample results collected during that 24-hour period; then use the daily average to calculate a quarterly average. S4.B.1.f. Permittees monitoring more than once per quarter shall average all of the monitoring results for each parameter (except pH and visible oil sheen) and compare the average value to the benchmark value. However, if Permittees collect more than one sample during a 24-hour period, they must first calculate the daily average of the individual grab sample results collected during that 24-hour period; then use the daily average to calculate a quarterly average.	There is duplicative language after the first sentence. Recommend striking the duplicative language as it is already stated in S4.B.1.f Or Add reference to S4.B1.f. for additional sampling requirements. S5.B.2. ~~Permittees sampling more than once per quarter shall average the sample results for each parameter and compare the average value to the benchmark to determine if it the discharge has exceeded a benchmark. However, if Permittees collect more than one sample during a 24-hour period, they must first calculate the daily average of the individual grab sample results collected during that 24-hour period; then use the daily average to calculate a quarterly average.~~
pp 27 - 29 including footnotes	Table 3	Should state at the onset that subtitle number codes are NAICS. Recommend adding dissolved metals analysis, so reporting is for both total and dissolved. The benchmark would still be based on total metals.
pp 27 - 29 including footnotes	Table 3	All of these sub-lists should be more industry-specific. Comments that follow are numbered according to Table subtitles.
Page 27	Table 3 1. Chemical and Allied Products - and - Food and Kindred Products	Unsure whether Chemical and Allied Products NAICS 325xxx is correct. A web search for *Chemical and Allied Products NAICS* yielded "Other Chemical and Allied Products Merchant Wholesalers", with a code of 424690. Ecology needs to check and verify all NAICS codes in the table
Page 27	Table 3 1. Chemical and Allied Products - and - Food and Kindred Products	Seems like a really odd pairing. I'd expect to see very different pollutant profiles from these two categories. While the list may be appropriate for Food and Kindred Products, it seems wholly inadequate for Chemical and Allied Products. As of 2012 EPA TSCA notes ~ 84,000 chemicals in its inventory. "The Society of Chemical Manufacturers and Affiliates reports that there are about 25,000 chemicals in commerce (SOCMA, 2014), but this is probably a minimum estimate". See https://www.ncbi.nlm.nih.gov/books/NBK268889/. At the very least some sampling should be required for some heavy metals and some organic compounds. Ecology should discuss in the Fact Sheet the reasons the particular selections are deemed representative.

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Page 27	Table 3 2. Primary Metals(33xx331xxx), Metals Mining (10xx2122xx), Automobile Salvage and Scrap Recycling (5015 42314x and 509342393x), Metals Fabricating (34xx332xxx), Machinery Manufacturing (333xxx)	While more closely related than those in 1. above, Metals Mining is more distinct than the other categories here. Metals mining monitoring should include Mercury (Hg) - in particular for gold mining, probably for copper mining, and possibly for others (some library research should help here). It is not clear that would be beneficial for the other NAICS categories currently listed in this sub-table. Arsenic monitoring is probably a prudent add for some to all of these - again, library research for determination. Asbestos monitoring would be prudent for Automobile Salvage and Scrap Recycling.
pp 27 - 28	Table 3 4. Air Transportation	Question: are the deicers organic and not salts, and as such are they indicated by BOD5 and COD? Or would addition of chloride monitoring be advisable?
Page 28	Table 3 5. Timber Product Industry (24xx321xxx), Paper and Allied Products (26xx322xxx), Wood Product Manufacturing (321xxx)	1.) Why not include BOD5 as a monitorng parameter? 2.) For Paper and Allied Products, why not include total residual chlorine as a monitoring parameter?
Page 28	Table 3 6. Transportation	For Petroleum Bulk Stations and Terminals, where the stored material is gasoline, why not require NWTPH-Gx as a monitoring parameter?
Page 28	Table 3 7. Coal Mining, etc.	Recommend adding mercury (Hg) and asbestos as monitoring parameters.
Page 28	Table 3 8. Marine Industrial Construction (ECY003)	1.) Need to list specific PAHs. There's more than one 'list' 2.) Fact Sheet does not say why p-cresol and phenol were added. Not suggesting they not be added - just asking that the reason(s) be given. 3.) Why not require monitoring for tributylin (TBT)? And while that has been banned (monitoring suggested for legacy residuals), what anti-fouling paints are now used? If not simply addition of e.g. Cu or Zn - for which monitoring is already required - rather, if some organic or organometallic (other than a Cu or Zn organometallic) substance is commonly used, why not require monitoring for that?
Page 29, footnote a to table 3	Footnote dropped the following sentence: If the Permittee is unable to obtain the required QL due to matrix effects, the Permittee must report the matrix-specific method detection level (MDL) and QL on the DMR.	Recommend restoring this sentence or clarifying why it was dropped and does not show up on the redline nor is it discussed in the FAQ. Or add explanation in the Fact Sheet re: Table 3.
Pate 30	Table 4	What's the nexus between Table 4 and Table 2? The title suggests Table 4 may be in lieu of Table 2, but Table 2 says, "Benchmarks and Sampling Requirements Applicable to **All** Facilities". Yet Table 4 differs from Table 2 in that T2 has single benchmark values and T4 has average monthly and maximum daily values. Offhand, it looks like the applicability note at the top of T2 should have this text appended: . . . ."except for facilities listed in Table 4".
Page 30, footnote f. to table 4	Alpha Terpineol µg/L 16 33 EPA 625.1 5N/A f 1/quarter Benzoic Acid µg/L 71 120 EPA 625.1 50N/A f 1/quarter	No annotation in the table referring to f. What is the link here?
p34, S8C4.	Level 2 Deadline: The Permittee shall sign/certify the SWPPP using the SWPPP Certification Form found on page 63 of this permit, and fully implement the revised SWPPP according to Permit Condition S3 and the applicable Stormwater Management Manual as soon as possible, but no later than August 31st of the following year.	
Page 35	Table 6.	The analytical methods for the three listed bacteria parameters are membrane filtration (MF). Anecdotally, my recollection from when I worked at Ecology's Environmental Assessment Program was that 'most probable number (MPN) was supposed to be used for marine and industrial water. The rationale was that MF is a harsher method than MPN, and that marine and industrial waters were expected a priori to being harsher environments than freshwater streams. The theory was that using a harsher method with an already harsh matrix could cause an under-count. Recommend the ISGP Perimt writer(s) consult with EAP staff with regard to the appropriate analytical method, and if warranted, change the listed methods in Table 6 to MPN methods.

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Page 45, S8D 5.	Level 3 Deadline	For bigger projects, the time to complete the engineering report, design, design documentes, acquire permits, procure a contract and a contractor,putting out public notices, and perform the work during dry weather can easilly take multiple years. In addition, other counties, cities, and DOE sometime need additional time to approve and provide feedback.
Page 44, S8D 5.	"…as soon as possible, but no later than September 30th the following year."	We propose the following: "…**the deadlines for installation shall be calculated from the date Ecology approves the engineering report."**
page 48, S9.F.b.	F.Reporting Permit Violations 1. In the event the Permittee is unable to comply with any of the terms and conditions of this permit which may endanger human health or the environment, or exceed any numeric effluent limitation in the permit, the Permittee shall, upon becoming aware of the circumstances: b. Immediately notify the local jurisdiction and appropriate Ecology regional office of the failure to comply: "notify local jurisdiction an.."	Clarify the purpose for reporting to the local jurisdiction as follows: "1. b. Immediately notify the local **MS4 permit holding** jurisdiction and appropriate Ecology regional office of the failure to comply:" Permit component S5. (BENCHMARKS, EFFLUENT LIMITATIONS AND SPECIFIC SAMPLING REQUIREMENTS) E. (Prohibited Discharges) defines prohibited discharges and includes illicit discharges. So, by definition, a permit violation is created by an illicit discharge and would need to be reported to the local jurisdiction so that additional action / notification could be done by the MS4 into which the illicit discharge is going to. However, there is no clear requirement in the SWPPP standards to maintain contact information for the local jurisdiction. I suggest commenting to add contact information be maintained as part of the SWPPP. Perhaps place the requirement under the illicit discharge section so that it is clearly linked to implementing illicit discharge abatement and prevention under the SWPPP. Any permit violation of a permited facility (not just discharge) should include notification to the jurisdiction in which the facility is located.
Page 50 S.10	Propose new section D	We propose the following: "A Permittee remains in compliance with S10.A when the Permittee notifies Ecology in writing within 30 days of becoming aware, based on credible site-specific information that a discharge from the facility is causing or contributing to a known or likely violation of Water Quality Standards in the receiving water. Written notification provided under this subsection shall, at a minimum, identify the source of the site-specific information, describe the nature and extent of the known or likely violation in the receiving water, and explain the reasons why the discharge is believed to be causing or contributing to the problem. For ongoing or continuing violations, a single written notification to Ecology will fulfill this requirement. Notification of known or likely violation of WQ Standards need also to be made to the owner of the local jurisdiction MS4 into and/or through which this discharge is occuring to allow additional action if necessary. Any permit violation of a permited facility (not just discharge) should include notification to the jurisdiction in which the facility is located. OR ... In the notification response from Ecology the impacted MS4 should be absolved of further action.
Page 50 S10	Propose New Section E	In the event that Ecology determines, based on a notification provided under S.10.D or through any other means, that a discharge by the Permittee is causing or contributing to a violation of Water Quality Standards in a receiving water, Ecology will notify the Permitee in writing that corrective action in accordance with S8 is required, unless: (1) Ecology also determines that the violation of Water Quality Standards is already being addressed by a Total Maximum Daily Load (TMDL) or other enforceable water quality cleanup plan; or (2) Ecology concludes the Permittee's contribution to the violation will be eliminated through implementation of other permit requirements. If added, include notification to the owner of the MS4 - any permit violation of a permitted facility (not just discharge) should include notification to the jurisdiction in which the facility is located.
Page 64	Appendix 2 - Definitions - Equivalent BMPs	Spell out the acronym SWMM
Page 65	Definition of Industrial Activity Industrial Activity means (1) the 11 categories of industrial activities identified in 40 CFR 122.26(b)(14)(i-xi) that must apply for either coverage under this permit or no exposure certification, (2) any facility conducting any activities described in Table 1, and (3) identified by Ecology as a significant contributor of pollutants. Table 1 lists the 11 categories of industrial activities identified in 40 CFR 122.26(b)(14)(i-xi) in a different format.	Add to (3) identified by Ecology as a significant contributor of pollutants. Ecology will provide written notification to the facility describing the reasons for and process by which Ecology made this determination.

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Page 71	Unsafe Conditions means those that are dangerous or create inaccessibility for personnel, such as local flooding, high winds, or electrical storms, or situations that otherwise make sampling impractical, such as drought or extended frozen conditions.	What unsafe conditions - relative to sampling - are caused by drought? If drought prevents sample collection, the more relevant reporting explanation is "no discharge". Recommend removing drought from this definition.