

Anonymous Anonymous

Please consider the following for further clarification and consideration:

NAICS Codes

NAICS codes also contain index entries that further describe the code. These index entries can lead to expansion or elaboration of the scope of applicable industries that have already been defined by the code definition.

For examples:

NAICS Code 532412

The list below shows all applicable index entries that are associated with this classification.

- Construction form rental
- Bulldozer rental or leasing without operator
- Construction machinery and equipment rental or leasing without operator
- Crane rental or leasing without operator
- Earth moving equipment rental or leasing without operator
- Forestry machinery and equipment rental or leasing
- Heavy construction equipment rental without operator
- Logging equipment rental or leasing without operator
- Mining machinery and equipment rental or leasing
- Oil field machinery and equipment rental or leasing
- Oil well drilling machinery and equipment rental or leasing
- Welding equipment rental or leasing
- Well drilling machinery and equipment rental or leasing

Often businesses in NAICS 532490 may look and operate similar to those in 532412 and it will be important to know how to differentiate.

Similarly, NAICS 493xxx and 531130 can be quite different business practices. Pollutant generating sources and activities can be vastly different in these two categories, yet they are lumped in the same group.

NAICS codes have demonstrated to be challenging to differentiate and may need further definition (what conditions, features, business practices, etc.) qualify the category and need for stormwater permit coverage and which do not.

Site map

Site maps may require multiple layers or pages to meet all of the requirements identified in S3.B.1. to be readable.

Good housekeeping

Please provide a definition for "storm proof" in S.3.B.4.i.2.d that is consistent with what solid waste service providers offer.

SPECP

S.3.B.4.c.4.i - SPCCP is not a searchable acronym under the EPA terms. The acronym is SPCC. Clarification on when an SPCC qualifies in lieu of an SPECP would also be a good idea.

Sampling Locations

S.4.B.2.a states that the "permittee is to designate". S.4.B.2.c states that "Ecology may require sampling points". I would challenge that Ecology is not likely to know or understand the site

drainage well enough to fully understand what defines "representative" discharge from the site and where the sampling location is to be located. Ultimately the responsibility of determining "representative" discharge should lie with the permittee to define and locate. If Ecology wants to encourage a site to get more samples collected that is something that can be communicated but Ecology should stop well short of putting an "x" on a map to define the sites discharge point.

S.4.B.3

Title should be "Discharge Points" not "Outfalls"

Level III Corrective Action

Please provide clarity of process to the following: "Upon written request Ecology may, one time during the permit cycle, waive this requirement on a case-by-case basis if a Permittee demonstrates to Ecology's satisfaction that the proposed Level 3 treatment BMPs are reasonably expected to meet ISGP benchmarks upon implementation."

What is the "written" request? Is it as simple as an email?

To whom at Ecology is this request sent?

What is being waived? Is it the need for an engineering report or the signature of a QISP or both?

If no response is given by Ecology to the permittee, what is the appropriate amount of time to wait until proceeding with the treatment approach?