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The addition of "Any Liquid chemical release onsite regardless of size or flowability is considered a spill and must be logged and addressed" in the draft ISGP is too broad and creates an overly burdensome requirement. The difficulty to meet this requirement also unnecessarily exposes facilities to 3rd party lawsuits. I suggest revising this sentence by adding either a) "if it could reasonably lead to a violation of a water quality standard" or b) "except that de minimis releases need not be logged" to the end of that sentence.