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I work with permittees, helping them maintain compliance with their Construction Stormwater General Permit. I have a few questions for you and hope you can help clarify some permit requirements.

First, I sometimes come across a section of High Visibility Fencing (HVS) where there is ponded turbid water on both sides of the HVS. Since there is no observable flow from the project side of the HVS to the off site side of the HVS (water is simply ponded), I do not consider this a discharge. The Stormwater Manual defines a discharge as a flow per unit of time. When I cannot find a flow past the project boundary, there is no discharge. Sampling the off site ponded turbid water might be interesting, but it would not be representative of a discharge and I would not report it in the monthly Discharge Monitoring Report. Does that all sound correct to you?

Do the 2 & 7 day rules in S9.D.5.d. also apply to soil stockpiles, or is this intended primarily for land/soil areas that are cleared of vegetation or excavated and are bare soil?

Do the words in S9.D.5.e., "if needed", indicate it is up to the permittee's discretion when looking at the weather forecast? That is, if the weekend or holiday forecast looks dry, can the soils be left as is?

The language in S9.D.5.f. specifically calls out "soil stockpiles". Often times, the construction project has stockpiles of gravel, gravel barrow, CSBC. Granted, these can be dirty/dusty at times and it makes sense to locate away from inlets, waterways and drainage channels. However, I do not consider them "soil stockpiles". Also, gravel, gravel barrow and CSBC are by themselves stabilized, because they are not soil and not eroded by raindrops. Am I correct that the stabilization requirement of S9.D.5.f. does not apply to gravel, gravel barrow and CSBC? Specifically, do gravel, gravel barrow and CSBC stockpiles need to be covered with plastic?

I also do not consider gravel, gravel barrow and CSBC to be exposed unworked soils. So, I do not think the 2 & 7 day rules in S9.D.5.d. apply. Is that correct?

In S9.D.6.a., if a slope is constructed using compacted gravel barrow, erosion is minimized because it is, well, compacted gravel barrow. So, I would use my own discretion, but likely not implement additional erosion control. Does that seem reasonable?

In Appendix A, the "Final Stabilization" mentions several "equivalent permanent stabilization measures". I am guessing this is not a comprehensive list. If an area of soil is hydroseeded with tackifier and there is no more soil disturbance in that area, does the tackifier qualify as an equivalent permanent stabilization measure? Or does the grass seed need to germinate first? Also, if bark is placed on an area of soils, does that count as an equivalent permanent stabilization measure?

Section S5.A. says to contact Ecology within 24 hours of "analysis". Sometimes there can be a delay between the time I grab a sample and when I analyze the sample. There have been times when a sample was collected late in the evening, but not run through a turbidity meter until the next day. Does the 24-hour time start when the sample is collected, or once it is analyzed? Also, I recall

an Ecology guidance document that said a turbidity sample can be measured up to 22-hours after sample collection. Is that correct? And, does the 22-hour also apply to pH?