

## Stakeholder Comments on Draft Industrial Stormwater General Permit (GAR050000) and EPD Response

Section	Requested Change	Comment	EPD Response
Front Page of Permit	Provide additional guidance as to what is in the permit	Consistent with EPA MSGP	The permit requirements are listed in the permit and cannot be easily reproduced into the front page. No change. A fact sheet will be available with the draft.
1.1.3.m	Remove oil water separator allowance	Not in MSGP	While discharge from oil water separators is not listed as an allowable nonstormwater discharge in the MSGP, multiple parts of the federal permit do allow discharge from oil water separators. EPD choose to apply this provision to all sectors by listing the discharge as an allowable non-stormwater discharge. This is language is not new to this draft.
1.1.3.n	Clarify inconsistency between sector 8.J.1.2 and 1.1.3.  Other commenter requested deleting mining vehicle washwater.	Municipalities do not agree with an allowable discharge of vehicle or equipment wash water. Clarify that vehicle washwater provision only applies to mining and prohibits discharge of detergents.	Deleted vehicle washwater as an allowable non-stormwater discharge. We added this exemption which is consistent with the EPA MSGP. EPD intends for vehicle and equipment washwater to continue to be an allowable discharge when co-mingled with stormwater in accordance with 8.J.1.2., but not a dry weather discharge. Common industry practice directs most discharge to mine pits.
1.1.4.1	Consider allowing an otherwise permitted effluent stream to comingle with the stormwater discharge		So long as sampling is representative of the stormwater discharge (per B.14.1) and is conducted before the two discharges co-mingle (mix), this practice is allowable under the current permit. No change necessary.
1.3.1.1.e.ii	Only provide Latitude and Longitude to those outfalls with industrial activity.	Do not see need to add outfalls that do not discharge industrial stormwater.	Added language to only list outfalls that discharge industrial stormwater.
1.3.1.3		Does the footnote detailing options EPD may take upon filing for coverage apply to any new discharger or only impaired streams	The footnote is not limited to impaired streams.

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2.1.1	Remove “must”, change to “consider.”		The term “must” is not a new term, but is in the existing permit. The selection of control measures is very important for the control of stormwater pollution. No change.
2.1.2.1	Remove new language “must implement unless infeasible” and change to “should.”	Inflexible	Language changed to existing language: “should”
2.1.2.1.a	Add “or reduce” to 2.1.2.1a regarding contaminated flow.	It sounds like all of the measures listed “must” be implemented. Does not make sense.	“Or reduce” added. Note that facilities “should pay particular attention to” these measures, not necessarily implement them everywhere where it does not make sense.
2.1.2.1.a	Modify Language	Define contaminated flow	Changed contaminated flows to contaminated stormwater
2.1.2.1.f	Add “(unless draining fluids would damage the equipment or vehicle)”	Draining oil and other fluids from equipment that is stored on-site may damage the equipment.	Added “(unless draining fluids would damage the equipment or vehicle)”
2.1.2.2	Change language from “including but not limited to” Other comment supported provision	Provide site specific flexibility	Changed “including but not limited to” to “consider” the following
2.1.2.2.c	Do not require covering all dumpsters.	May contain only inert material	Secondary control only required for dumpsters without lids and that have potential to contaminate stormwater. Changed from “leak”
2.1.2.3	Remove plastic requirements	Not a control measure	The control of plastic pollution is not sector specific, but could occur in multiple sectors. This is an addition from the EPA MSGP under “good housekeeping” – no change
2.1.2.4	Remove the word “immediately” from the text or alternatively, replace with “as soon as practicable” or “in the interim”	In an operational facility, it may not be safe, possible or reasonable to react “immediately” to a minor routine maintenance issue that may have no impact to stormwater quality in the short term (e.g., such as debris at 5” from an outlet pipe during a dry weather period).	Revised to “as soon as practicable”

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	Unknown	Clarify what Maintenance Control Measures used to achieve effluent limits refers	Effluent limits refers to both nonnumeric technology based effluent limits, water quality based effluent limits, and numeric effluent limits. Control measures should be used to meet all purposes.
	Remove “diligently” from maintain		“diligently” removed.
2.1.2.4.c	Add “significant amounts” to clause preventing escape of dust		Added “significant amounts”
	Remove regulation of baghouse from stormwater permit		Baghouses are potential sources of stormwater pollution. No change.
2.1.2.4.d	Change catch basin cleaning requirements to manufacturer’s recommendations		Added a provision for cleaning catch basins in accordance with manufacturer’s recommendations or as appropriate and/or when 2/3 full.
2.1.2.6	Modify the sentence starting “Place flow velocity dissipation devices...” to “Place flow velocity dissipation devices, when necessary, ...”	The language as written requires flow dissipation devices, regardless of whether needed at an outfall, to be in compliance with the permit.	Added “If necessary and feasible,”
	Reference Manual for polymer usage		The Manual is referenced.
	Make consistent with appendix C relative to chemical usage.		Chemical disinfectant and polymer usage are different and subject to different requirements.
	Is chemical treatment allowed?		The use of chemical treatment is allowed under this permit consistent with its requirements and with water quality standards.
	Use of Manual should be guidance, not required Delete reference to manual.		Changed to “referencing” the Manual. Added “use appropriate control measures to stabilize exposed areas...”

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Section	Requested Change	Comment	EPD Response
	Typo “including the sector-specific Industrial with Industrial Storm Water Fact Sheet Series”	Remove “Industrial with”	Error Corrected
2.1.2.7	Remove the word “all” in the first sentence.	Use of the word “all” requires each and every reasonable step be taken though a subset may address the issue. Known reasonable steps are appropriate but the “all” provides an unreasonable and burdensome standard.	Deleted all.
3.3.1	Use MSGP clarifications for “immediately” and “all reasonable steps”	<p>MSGP:            Note: In this context, the term “immediately” requires you to, on the same day a condition requiring corrective action is found, take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational. However, if a problem is identified at a time in the work day when it is too late to initiate corrective action, the initiation of corrective action must begin no later than the following work day. “All reasonable steps” means that the permittee has undertaken initial actions to assess and address the condition causing the corrective action, including, for example, cleaning up any exposed materials that may be discharged in a storm event (e.g., through sweeping, vacuuming) or making arrangements (i.e., scheduling) for a new BMP to be installed at a later date.</p>	Reworded to remove “immediate” and change to “as soon as practicable.”

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3.3.1	<p>Timelines change back to the original 30 day (instead of the new 14 day) and 90 day (instead of 45 days).</p> <p>Other comment suggested removing deadline.</p> <p>Other commenters supported the reduction in time for corrective action.</p>	<p>While we understand the EPD’s reasoning that some regulated entities are not honoring the current deadlines and completing corrective actions in a timely fashion, we do not believe that shortening the deadlines for all regulated facilities will bring non-compliant facilities into compliance. Rather enforcement action for non-compliance needs to be entity specific.</p> <p>The shortened deadlines are difficult and can be unreasonable as well as burdensome for many actions. For example 14 days for obtaining a contract or purchase order to obtain materials, order, and receive is difficult to impossible for most government entities and many private entities. Therefore an excessive increase in paperwork will then be required to document the infeasibility each and every action.</p> <p>Another commenter supported the 14 and 45 day requirement as necessary to get pollution events cleaned up.</p>	Timelines changed to previous 30/90 day timeline.
3.3.2, 3.4, 3.5 & multiple references to	Remove EPD approval for additional time for corrective action.		Deleted requirement for EPD approval. Added requirement for preparing a schedule and documenting progress.
3.4	Change 24 hours for documenting discovery of listed conditions to 5 days		Since actions necessitating a corrective action often involve the reduction of pollution, it is important that these actions be taken as soon as practicable. We maintain the current 24-hr language.

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4.1.1.1.d	Remove requirement to inspect offsite tracking of material	Burdensome	Offsite tracking inspection is in the EPA MSGP. It indicates that “you must examine or look for the following...”
4.1.2	Delete the added subsection “i”  Other Comment supported the addition.	Requirement of the Responsible Official, Principal Executive Officer or ranking elected official (ROs), or delegate to sign each individual facility inspection is unreasonable, burdensome, and redundant (they are required to sign the Annual Report which contains a summary of corrective actions based on the inspections).  For large municipalities or corporations, the RO will not be located at a facility and involved with day to day operations like routine inspections nor are they readily available to review, conduct the necessary inquiries, and sign on a timely basis. In order to meet this requirement, the delegation of authority down to the level responsible for the activity negates the intent of the regulations in having a RO sign required documents.	Deleted
4.2.1.3.i	Comparison should follow water quality regulations, add reference to standards.	Simplify regulations and harmonize with water quality standards	Revised to add scum and debris.
4.2.2	Remove requirement for certification, comparison to past results, and photographs  Other commenters supported providing photo documentation.	Photos are of varying quality and are difficult to compare. Some industrial sites prohibit employee photography without special permission.	Certification removed Requirement for photography changed to recommendation. Comparison to past results removed.

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4.2.3.3.c	Change “the following factors shall be considered” to “the following factors should be considered.” Remove substantially identical outfall section c and reference to 6.1.1 Other commenter supported provision.	The factors to be considered to determine substantially identical outfalls are site specific, thus hard to fully define. Make this flexible to allow for site specific conditions.	Deleted new section c on substantially identical outfalls. Added reference to 6.1.1. under 4.2.3.3.a
4.3.2.e.vi	Change “list” to “document”  Other commenter supported the additional language  Other commenter suggested removing requirement.	Erosion and sedimentation is a significant contributor to polluted stormwater discharges from industrial sites. It is important for permittees to inspect their sites and identify areas prone to erosion in order to prevent polluted stormwater discharges.	Changed “list” to “document”.
5.1.1.2	Request change from “Training must be conducted at hiring...” to “Training must be conducted as soon as practicable after hiring...”  Who needs training poorly defined  Move training to section 2.1.2  Add a signature to the roster  5.1.1.3 e conflicts with 5.1.1.2	Immediately after hiring is not always practicable, but shortly after hiring can be implemented. It behooves the permittee to train new employees as soon as possible, but the permit needs to provide time for this training to happen.  Consistent with MSGP	Changed to as soon as practicable after hiring  Section was intentionally moved for clarity. Adding signatures unnecessarily increases compliance requirements. Added reference to training on “corrective action”
5.1.1.3	Request change from “You must ensure the following personnel understand...” to “You must train and test for understanding the following personnel regarding ...”	Leadership and management can train and test on knowledge as an indication of understanding but cannot “ensure” “understanding” beyond providing the training and testing the knowledge.	Changed to “You must train the following personnel to complete their specific responsibilities”
5.1.1.3	Remove requirement to record individual names	Burdensome	Rosters of training are necessary to verify training was received.

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5.1.2.3.n	Delete.	Delineating areas prone to erosion is too subjective and control measures are already required.	Removed requirement for delineating control measures as that is already required in 5.1.2.3.c, Maintained requirement to delineate areas prone to erosion in order to provide information relative to where future control measures may be necessary.
5.1.3.4.f	Change to require smoke/dye testing only if facility drainage impacts  Keep 2006 exemption instead of updating to 2012  Comment supporting provision .		Language limits test to alterations that “impact stormwater”.  If testing was already performed, it does not have to be redone, if records are maintained and no alterations. – No change
5.1.3.7	Remove the no discharge analysis provision.  Another commenter suggested expanding the analysis to include existing and new permittees Other commenter expressed support for the addition with P.E. certification.	May create legal questions relative to NPDES permit coverage.  Provides equity for new and existing discharges	The no discharge analysis and definition was removed.
5.1.4.2	Remove annual certification of control measures	Requirement refers to vague and undefined terms such as “extent achievable,” “economically practicable,” and “achievable in light of best industry practice.” Cannot reasonable certify compliance with such vague and ambiguous requirements.	Certification removed.
5.1.6	Remove requirement to certify SWPPP		Requirement to certify SWPPP removed. Signature requirement remains.



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5.2.1	Change last sentence to: “The SWPPP must be reviewed annually as part of the annual comprehensive inspection, documented within the inspection form and must be updated as required.”	Unnecessary to update the SWPPP annually if no conditions changed at the facility. However, it should be reviewed annually.	Sentence “The SWPPP must be updated at least annually” deleted.
5.3.1	<p>Provide a distinct process for “readily available to the public” clarifying specifically this does not provide access to the facility by the public similar to a Regulators right to access. We would request that any public access be via the EPD.</p> <p>Other comment supported readily available public access to the document and removal of the inefficiency of having to request from EPD.</p>	<p>As written, the section indicates the public have the right to show up on our property and view or obtain a copy of the plan at any time. Many facilities have specific security and safety requirements for access and are not open to the public and this provides unreasonable access for the public. Additionally, without a formal, documented process through EPD, there is no record of request and compliance to EPD for enforcement/compliance purposes.</p>	Removed reference to supplying SWPPP Directly to the public.
6.1.4.	Allow additional time from the 30 minutes for collecting a sample		Language mirrors the EPA MSGP. It also allows that if collecting a sample within 30 minutes is not possible, collect as soon as practicable and document why sampling is late.
6.1.8	Clarify language to note all documentation is to appear in the SWPPP		Reworded to make clear that the schedule, explanation, and certification that samples are representative appear in the SWPPP.
6.1.8	Add unstaffed but inactive sites for alternative schedules		Unstaffed but active sites are not excluded.

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6.2.1.2 (c)(ii)	Request reverting to original language.	The language is not consistent with the federal requirements for the NPDES program use of Geometric mean (Geomean) calculation for reporting of results. The use is intended to dampen the effect of very high or low values which might bias the mean if a straight average is used.	Collecting enough qualifying stormwater samples to generate a geometric mean has proved problematic. Therefore, we have removed the requirement for a geometric mean.
Table 8.A-1 note 4	Is the requirement to sample material storage piles still relevant?		Yes, it is still relevant for new permittees.
8.F.5	Left column does not designate which parameters go with which subsector		All parameters go with all subsectors.
8.I.4.1	Clarify no discharge provision		The proposed definition of “no discharge” in Appendix A was removed. The term “no discharge” is retained here for the oil and gas sector consistent with the EPA MSGP.
Sector J General Notes	Change Note one to clarify that the Land Protection Branch “governs” erosion and sediment control measures.  Add Individual “or general” permit  Change fully to functionally	Ensure that responsibilities are identified	Accepted changes.
8.J.1.2	Change process fluids to process water Change mine drainage to process water  Clarify that discharge of soap, solvent or detergents is not allowed.	Mine drainage is undefined	Changed from process fluids to process water. Mine drainage changed to process water.  Added.

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Sector J	<p>Clarify that vehicle wash water is allowed.</p> <p>Change definition of process water to remove mine drainage</p> <p>Add "To the extent that an applicable SMP addresses the items in this Subpart 8.J.4.2.1 through 8.J.4.2.9, you are considered to have complied with the relevant requirements in Subpart 8.J.4.2.1 through 8.J.4.2.9." (also add to 8.J.5)</p> <p>Change immediately to as soon as practicable for employee training</p> <p>Move SWPPP documentation note to 8.J.4.2.6</p> <p>Remove pH benchmark</p>	<p>Inconsistent</p> <p>Mine drainage is undefined</p> <p>Make consistent with General Note at front of sector J.</p> <p>Not in MSGP</p>	<p>Clarified that mine vehicle wash water is allowed.</p> <p>Mine drainage removed</p> <p>Note added</p> <p>Changed to as soon as practicable</p> <p>This would remove requirement to document – no change made.</p> <p>pH is in the MSGP for metal mining, but not dimension and crushed stone. The benchmark table was revised.</p>
8.L.2	Remove addition prohibiting coverage of municipal solid waste landfills	Most MSWLF have received some industrial or hazardous waste and are therefore eligible for coverage	Deleted prohibition of municipal landfill coverage.
8.L.2.2	Delete "material" suppliers		deleted
Sector L	Include C&D Landfills under coverage	They can be sources of pollution	Co-located C&D landfills at industrial facilities are covered. C&D Landfills receiving "industrial waste" are covered. C&D Landfills that have never received industrial waste are not eligible for coverage. No change.

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Sector S	Add "shared tenancy" definition	Will Glycol and Urea be noted on the NOI?  There are many facilities who question this.	Yes, it is planned to be noted on the NOI.  Shared tenancy is not used in the draft. There are many contractual arrangements that can be used by airport owners and their tenants. The permit does not favor any particular arrangement.
8.M.2.4.e	Covers should not be limited to stock piles, but all areas where potential pollutants are likely to be exposed.		Added areas where potential pollutants are likely to be exposed, including material stockpile areas to 8.M.2.4
8.N.4.1.5.f	Define residual, Oil Water Separator should not be an allowable discharge		No change. Sector only presents options for treatment.
8.N.4.3.4	Land applying vehicle washwater is not consistent with the MSGP		Land application of vehicle washwater is an option for disposal if done in accordance with applicable law.
8.R.3.1.2 & 8.R.3.1.5	These two sections are nearly identical		8.R.3.1.5 deleted.
Sector V	Change inspection frequency to quarterly	Consistent with other sectors	Inspection frequency changed to quarterly.
Appendix A. Definitions	Add back in "site used for the application or disposal of process waste water (as defined at 40 CFR 401)		Deletion restored.
Appendix C	Add definition of Animal Handling Area		Definition added: Animal Handling Area – those areas where animals or animal containers (trucks, cages, etc.) are stored or unloaded and where offal is stored and loaded. Animal handling areas exclude access roads with no truck parking, clean truck and cage storage areas, clean equipment storage yards, and roof runoff.

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	Change definition of Pollutant of concern to add “associated with industrial activity”		The pollutant of concern is associated with stream impairment and is not impacted by the presence or absence of industrial activity. Activities not associated with the specific industrial activity covered by this permit are not eligible for permit coverage under this permit. No change.
	<p>Add “pollutant of concern” to discharge into an impaired stream segment.</p> <p>Define Impaired Waters Benchmark, reference correctly.</p> <p>Change reference to C10.3 to reference certification directly.</p> <p>Add “as a result of industrial activity” to areas likely to cause or contribute to impairment for the 1.2” capture option in C.2.2, C.2.3., C.2.4, and C.10.1.</p>		<p>Discharge is already defined as “discharge of a pollutant”. Section C.1.2 provides procedures for addressing “...that the pollutant(s) for which the water body is impaired is not present at the facility as a result of industrial activity...”</p> <p>References changed. Impaired waters benchmark is defined in C.2.1</p> <p>Reference to C.10.3 deleted. Instructions to document P.E. certification in SWPPP provided in text.</p> <p>Added “as a result of industrial activity”</p>

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C.1.3.3	<p>Clarify that facilities that monitor are eligible for coverage.</p> <p>Remove reference to demonstration that the discharge will not cause or contribute to an exceedance of a Water Quality Standard.</p>		<p>C.1 indicates that the permittee is not eligible unless they perform one of the options provided. Monitoring as described in C.1.3.3 is one of the options.</p> <p>The permit requires that the permittee demonstrate that their discharge will not cause or contribute to water quality standards violations. Section 301(b)(1)(C) of the Clean Water Act and the NPDES regulations at 40 CFR 122.44(d) require that permits contain limits as stringent as necessary to meet state Water Quality Standards.</p>
C.2.1	Change Impaired Waters Benchmark to mean the applicable benchmark value for the ...		In order to avoid confusion between benchmark values for sectors and Appendix C benchmark values, we coined the term Impaired Waters Benchmark.
C.2.3.1	Strike C.2.3.3 and move under C.2.3.1		Toxicity, etc. listing criteria moved to a separate section C.2.3.5, instead of under BIO F, BIO M and sediment.
C2.3.1	Allow the development of alternative benchmarks	TSS is a poor surrogate for some reasons for fish impairment such as toxicity, habitat, DO, etc.	We generally agree that TSS is an imprecise indicator. However, for a general permit, we believe it is broadly protective and will allow for restoration of most streams. Individual permits are available to provide the mechanism for a study to create site-specific benchmarks.
C2.3.1 C.2.4	Allow upstream and downstream turbidity monitoring in lieu of TSS	Allow the facility to more clearly demonstrate impact on the receiving stream.	We appreciate the desire to more clearly demonstrate facility impact. However, for a general permit, in order to facilitate data comparison and simplify data entry, we will remain with the 100 mg/L TSS. Individual permits are available to provide the mechanism for such a limit should it be desired.

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	<p>We support the simplification of the criteria but the analytical data collected by the facilities to be used to compare to the standard needs to be consistent with the federal NPDES program which utilizes a Geomean for fecal coliform comparisons.</p> <p>4,000 counts/ml could allow the facility to exceed water quality standards and should be returned to a seasonal value to mirror the water quality standard.</p>	<p>See comment on section 6.2.1.2. The issue here is to obtain a geometric mean within WQS which is within 30 days. If EPD will require the geometric mean (instead of average) and give a longer duration of time to obtain samples, it would be more achievable and scientifically accurate.</p>	<p>Stormwater discharges are by their nature, discontinuous and do not reflect the same type of variability as the natural stream standard, hence we have changed the benchmark to reflect a reasonable value for bacterial samples that is protective of the monthly water quality standard. Expressing the water quality standard as a geometric mean mathematically recognizes the inherent variability in bacteria monitoring in streams. We have chosen to remove the requirement for geometric mean of stormwater sampling to facilitate the analysis of samples of discontinuous stormwater discharges. EPA allows an iterative approach to restoring streams, and EPD will re-examine this impaired waters benchmark over time to assess its effectiveness.</p>
C.2.4.2	<p>Please provide the acceptance criteria that will be used by EPD for approval of the DNA Analysis as documentation that the bacteriological constituents found are not present as a result of industrial activity.</p>	<p>DNA analysis is a relatively new technology without clear guidance on usage or results. Therefore, clear guidance on the information required for a testing program and the results that are acceptable to EPD for to meet the standard of proof is required.</p>	<p>Added language “The results of the testing must demonstrate that bacterial contamination from industrial activity does not contribute to a violation of water quality standards.” The plan will be site specific. It must be provided by the permittee and will be approved on a case by case basis.</p>
C.2.4.3.b	<p>Define Areas likely to cause impairment as animal handling areas for sector U3</p>		<p>Added “For facilities in Sector U3, this shall be the animal handling areas.”</p>
C.2.4.3.c	<p>Clarify that Sampling, containing, or treating water exceeding the treatment volume is not required.</p>		<p>The treatment volume is the volume that the system must be designed to treat. Sampling was addressed by adding: “Sampling of discharges exceeding the treatment volume is not required.” Containment is not required, but may be part of a treatment system.</p>

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C.2.4.4	Apply monitoring and EPD approval for chemical treatment		The permit requires “The residual of any chemicals used to disinfect the discharge must meet the in-stream Water Quality Standards. EPD may specify additional end-of-pipe monitoring and/or effluent limitations as necessary to ensure compliance with applicable Water Quality Standards.” and/or criteria in the receiving stream.”
C.3.1		Clarify confusing language	Renamed “Facilities Not Continuing Sampling from the Prior Permit.” From “New Facilities and newly regulated” facilities
C.10.1.c	Increase sampling frequency for facilities that failed impaired waters benchmark. Include all not just fecal and increase frequency		C3.1.1 changed to apply to Parts C.2.2.2.b, C.2.3.2.b C.2.4.3.b and C.10.1.c (the sections with the 1.2” capture and treat option) and sampling frequency increased to twice per quarter for facilities that fail.
C.10.1	Add clarification to identify animal Handling Areas for Sector U3		Added “For facilities in Sector U3, this shall be the animal handling areas.”
C.10.1.c			Added “Sampling of discharges exceeding the treatment volume is not required” to be consistent with Parts C.2.2.2.c, C.2.3.2.c, and C.2.4.2.c.
(Previous) C.10.3		Clarify permit	C.10.3 deleted and text specifying sampling requirements moved to sections a, b, or c to improve readability.
Appendix E	Clarify whether metals values are Total or Dissolved		Added note “total”
Global	Change “discharge points” and “point of discharge” to “outfalls”	Clarity	“Discharge points” and “point of discharge” all changed to “outfalls” for consistency.



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General		Make e-filed documents publically available	EPD is currently developing the e-reporting system for industrial stormwater submittals. The system has a “public” portal that will allow members of the public to view certain information. We will take the comment to allow public access of documents into consideration as we develop the system.
General	Simplify Language		EPD has attempted to simplify language wherever possible while still providing an enforceable permit.
General	Make permit applicable to Combined sewer systems		After consultation with EPA, the permit cannot compel coverage of facilities that discharge to an NPDES permitted CSO outfall. The CSO permittee (City) may choose to compel the industrial discharger to obtain a pre-treatment permit for their stormwater discharge.
General	Clarify the term Effluent limit		The term effluent limit refers to both numeric and nonnumeric effluent limits.
Substantially identical outfalls		Are substantially identical outfalls available for impaired streams?	Yes.
No Exposure Form	Change certification statement to clarify that secondary containment is allowed.		EPD has allowed facilities to file for no exposure with properly designed secondary containment. We plan to revise the No exposure form with the e- reporting system.