

Summary of Changes in the Preliminary Draft Sand & Gravel General Permit

The Washington Department of Ecology (Ecology) invites informal public comments on the preliminary draft language for the Sand & Gravel General Permit (permit) from May 26, 2015 through June 9, 2015. This document provides a summary of the proposed changes in the Preliminary Draft Sand & Gravel General Permit. Visit <http://www.ecy.wa.gov/programs/wq/sand/index.html> to download the Preliminary Draft Sand & Gravel General

The majority of changes in the Preliminary Draft Sand & Gravel General Permit can be grouped in five categories.

Substantive

- Removed the effluent limit for Nitrate + Nitrite.
- Require electronic reporting for NOIs, DMRs, and other submittals.
- Removed the two year and two six month extension time limit for portable facilities to stay on one site.

Clarity – changes made to clearly state level of expectation. Example of changes:

- Added an authorization section to clarify that permittees only have coverage for the discharges that they apply for in their applications. This includes both the activity codes and the types of discharge (surface, groundwater, or both).
- Added language for spill reporting including phone numbers for the National Response Center and Washington Emergency Management Division.
- Added language stating that permittees must implement applicable BMPs (it's not enough just to have a SWPPP they must also implement the BMPs within their SWPPP).
- Provide permittees additional time to respond to public records requests when they receive requests for multiple facilities covered under the permit.
- Revised the language to only require engineering reports for treatment BMPs / facilities instead of all wastewater control facilities.
- Clarified that inactive sites that have process water or mine dewatering discharges need to monitor and submit quarterly DMRs.

Updates – changes made to match CFR, replace outdated information, or based on appeals.

- Revised exception language for Indian Country.
- Removed SIC codes from the front of the permit (replaced by NAICS in 1997), updated descriptions for NAICS codes in Appendix A.
- Due to PCHB decision on ISGP – Revised the engineering plan requirements to no longer directly reference chapter 173-240 WAC and instead list out the requirements for the engineering report.
- Added language and table with recommended analytical methods and laboratory quantitation levels.

Cleaning – changes made for flow and organization. Example of changes:

- Moved the monitoring requirements from the Reporting and Monitoring Plan sections into the Sampling and Analytical Procedures section.
- Grouped the site map requirements from the SWPPP and Monitoring Plan sections into one section.
- Removed duplicative language (S3.E.6 and S3.J had the exact same language).

Unresolved – changes Ecology is considering but are redlined language isn't propose. These issues still need resolution for the final draft permit. These issues are noted within text boxes in the preliminary draft permit.

- The current inspection requirements have frequencies spanning the range of twice a year, to once a month, to after any storm event of greater than 0.5 inches of rain. Ecology is interested in ways to simplify the varied inspection requirements.
- Recycled concrete stockpiles
- Recycling asphalt shingles