



Permit MATRIX

State	WA	OR	CA
Permit Name	ISGP	1200-Z	IGP
Monthly Site Inspections	Yes	Yes	Yes
Inspection Reports	Yes, monthly (retain onsite as part of SWPP)	Yes, monthly (retain onsite and submit by request)	With annual report
Annual Report	Yes, due 5/15	Yes, Tier 2 geometric mean benchmark evaluation due 8/15	Yes
Stormwater Pollution Control Plan	SWPPP	SWPCP	SWPPP
	Three "Level" System	Two "Tier" System	Two "Level" System
Benchmark Exceedance Response	<p>Level 1 Corrective Action (Operational Source Control BMP): Permittees that exceed any benchmark value and/or for any quarter must, within 14 days of receipt:</p> <ul style="list-style-type: none"> -Conduct an inspection -Review the SWPPP/make appropriate revisions -Prepare/Complete a Level 1 Corrective Action in the Annual Report -Permittee must sign and certify the SWPPP no later than the DMR due date for the quarter the benchmark was exceeded. 	<p>Tier 1 Corrective Action:</p> <p>If monitoring results exceed any benchmark or visual observations show signs of pollution, within 30 days of receipt:</p> <ul style="list-style-type: none"> -Complete a site assessment -Review SWPCP/make appropriate revisions -Prepare Tier 1 Report, retain on site and submit to DEQ or agent upon request -Implement Corrective Actions -Submit changes made to SWPCP based on site assessment to DEQ or Agent 	<p>Level 1 Exceedance Response Action (ERA): If an annual NAL is exceeded (average of all samples taken) or 2 instantaneous NAL exceedances, starts on July 1 of the following reporting year:</p> <ul style="list-style-type: none"> * ERA Evaluation - Complete by Oct 1 - Complete an evaluation of the sources related to exceedance - Identify corresponding BMPs and additional BMPs comply with requirements *ERA Report - Complete by Jan 1 - Revise SWPPP and implement additional BMPs - Summary of ERA Evaluation - Detailed description of SWPPP revisions and additional BMPs
	<p>Level 2 Corrective Action (Structural Source Control BMP): Permittees that exceed a benchmark (for a single parameter) for any two quarters during a calendar year must:</p> <ul style="list-style-type: none"> -Review SWPPP and make appropriate revisions to include additional Structural Source Control BMPs -Complete a Level 2 Corrective Action and summarize in the Annual Report -Must be completed no later than Aug 31st of the following year 	<p>Tier 2 Corrective Action:</p> <p><i>If geometric mean concentrations that exceed benchmark(s) during each full reporting year (or)</i></p> <p><i>If 50% or more of pH results during two full years are outside the range permit registrants must:</i></p> <ul style="list-style-type: none"> -Report exceedances in the Discharge Monitoring Report form -Revise the SWPCP to include additional stormwater treatment measures as part of a Tier 2 corrective action response; implement by 09/30 (a year and nine months after the Tier 2 proposal corrective action response submittal deadline of 12/31), or submit a Tier 2 Mass Reduction Waiver or a Tier 2 Background Waiver. -Professional engineer or Oregon certified engineering geologist must design and stamp the portion of the SWPCP addressing the treatment measures -Submit the revised SWPCP to DEQ or Agent by 12/31 (six months after the end of the full reporting year that triggered a Tier 2) -Within 30 days, inform DEQ or agent when Tier 2 has been completed -Tier 1 corrective actions are required where Tier 2 has been implemented 	<p>Level 2 ERA: If a Level 1 Discharger has an exceedance after Level 1 corrective action (single parameter):</p> <ul style="list-style-type: none"> * ERA Action Plan - Due January 1 - A schedule and detailed description of the tasks required to complete the Technical Report items * ERA Technical Report - Due Jan 1 - Overall assessment of sources of pollutants, current reduction methods and propose new methods

	<p>Level 3 Corrective Action (Treatment BMPs): Permittees that exceed a benchmark (for a single parameter) for any three quarters during a calendar year:</p> <ul style="list-style-type: none"> -Review SWPPP and make appropriate revisions to include additional Treatment BMPs -Qualified Industrial Stormwater Professional must review SWPPP and sign SWPPP Certification Form -Submit engineering report (by licensed PE) to Ecology before installing treatment BMPs which require site-specific sizing or design. Submit no later than May 15th prior to the Level 3 deadline -Submit O&M manual no later than 30 days after installation -Summarize Level 3 Corrective Actions in the Annual Report -BMP Installation must be completed no later than Sept 30 of the following year 	NA	NA
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Permit MATRIX (Cont'd)

State	WA	OR	CA;	Action Levels (NALs) & Numeric Effluent Limitations (NELs)	Numerical
	Copper	Western WA: 0.014 mg/L Eastern WA:	<u>Georegions</u> Columbia Slough: 0.017 mg/L Portland Harbour: 0.015 Cascades: 0.016 Coastal: 0.017 Columbia River Mainstem: 0.023 Eastern: 0.031 Willamette Valley: 0.015 Marine Waters: 0.025	Annual NAL: 0.0332 mg/L	
	Lead	0.0646 mg/L	Columbia Slough: 0.10 mg/L Portland Harbour: 0.24 Cascades: 0.018 Coastal: 0.039 Columbia River Mainstem: 0.21 Eastern: 0.077 Willamette Valley: 0.11 Marine Waters: 1.10	Annual NAL: 0.262 mg/L	
	Zinc	Western WA: 0.117 mg/L	Columbia Slough: 0.24 mg/L Portland Harbour: 0.24 Cascades: 0.068 Coastal: 0.086 Columbia River Mainstem: 0.35 Eastern: 0.16 Willamette Valley: 0.14 Marine Waters: 0.46	Annual NAL: 0.260 mg/L	
	Aluminum		1.10 mg/L	Annual NAL: 0.75 mg/L	
	Iron		10 mg/L	Annual NAL: 1 mg/L	
	Magnesium	0.064 mg/L	0.064 mg/L	Annual NAL: 0.064 mg/L	

Statewide Benchmarks (All Facilities)	Cadmium	0.0021 mg/L	Cascades: 0.00039 mg/L Coastal: 0.0010 Columbia River Mainstem: 0.0024 Columbia Slough: 0.00099 Eastern: 0.0019 Portland Harbour: 0.00095 Willamette Valley: 0.0015 Marine Waters: 0.040	Annual NAL: 0.0053 mg/L
	Nickel		Cascades: 0.083 mg/L Coastal: 0.17 Columbia River Mainstem: 0.32 Columbia Slough: 0.17 Eastern: 0.28 Portland Harbour: 0.16 Willamette Valley: 0.22 Marine Waters: 0.074	Annual NAL: 1.02 mg/L
	Mercury	0.0014 mg/L	Freshwater: 0.0024 mg/L Saltwater: 0.0021	Annual NAL: 0.0014 mg/L
	Selenium	0.005 mg/L	Cascades: 0.013 mg/L Coastal: 0.013 Columbia River Mainstem: 0.013 Columbia Slough: 0.013 Eastern: 0.013 Portland Harbour: 0.013 Willamette Valley: 0.013 Marine Waters: 0.29 mg/L	Annual NAL: 0.005 mg/L
	Silver	0.0038 mg/L	Cascades: 0.00011 mg/L Coastal: 0.00047 Columbia River Mainstem: 0.0017 Columbia Slough: 0.00046 Eastern: 0.0013 Portland Harbour: 0.00044 Willamette Valley: 0.00085 Marine Waters: 0.0019	Annual NAL: 0.0183 mg/L
	Beryllium		0.13 mg/L	
	Antimony		9.0 mg/L	
	Arsenic	0.15 mg/L	Freshwater: 0.34 mg/L Saltwater: 0.069	Annual NAL: 0.15 mg/L
	Cyanide	0.022 mg/L	Freshwater: 0.022 mg/L Saltwater: 0.001	Annual NAL: 0.022 mg/L
	TSS	100 mg/L	Columbia Slough: 30 mg/L Portland Harbour: 30 Cascades: 100 Coastal: 100 Columbia River Mainstem: 100 Eastern: 100 Willamette Valley: 100 Marine Waters: 100	Annual NAL: 100 mg/L *; Instantaneous Maximum NAL: 400 mg/L

	E. Coli		406 cfu/100ml	
	BOD ₅	30 mg/L	Columbia Slough: 24 mg/L	Annual NAL: 30 mg/L
	COD	120 mg/L	120 mg/L	Annual NAL: 120 mg/L
	Ammonia (as N)	2.1 mg/L	2.14 mg/L	Annual NAL: 2.14 mg/L
	Nitrate + Nitrite (as N)	0.68 mg/L	10 mg/L	Annual NAL: 0.68 mg/L
	Petroleum Hydrocarbons	10 mg/L	-	
	Phosphorus	2.0 mg/L	Columbia Slough: 0.16 mg/L Specific Subsectors: 2.0	Annual NAL: 2.0 mg/L
	Oil and Grease		15.0 mg/L, daily maximum and 10 mg/L, 30-day average	Annual NAL: 15 mg/L*; Instantaneous Maximum NAL: 25 mg/L
	Oil Sheen	No Visible Oil Sheen	No Visible Oil Sheen	
	Turbidity	25 NTUs	50 NTU	
	pH	5.0 - 9.0 s.u.	5.5 - 9.0 s.u. Columbia River Mainstem or Marine Waters : 6.0 - 9.0 s.u.	Annual NAL: N/A; Instantaneous Maximum NAL: 6.00-9.00 s.u.*
	Additional Monitoring		Sector-specific requirements associated with primary industrial activity and any co-located industrial activities - Schedule E of the permit	Based on site pollutant assesment
	Impairment Pollutants		Two samples per year	
	Reporting Year	January 1 - December 31	July 1 - June 30	July 1 - June 30
	Monitoring Schedule	Once per quarter	Benchmarks - Four times per year; 2 samples between 1/1-6/30, and 2 samples between 7/1-12/31 Limits - Two times per year; 1 sample between 1/1-6/30, and 1 sample between 7/1-12/31 (unless limit exceeded, increase to four times)	2 Qualified Storm Events (QSEs) per half reporting year
	Discharge Monitoring Report	1/quarter; due 2/15, 5/15, 8/15, 11/15	1/quarter; 11/15, 2/15, 5/15, 8/15	QSEs submitted to SMARTs by site QISP.
	Monitoring Waiver	No	Yes	No (can get sampling reduction of 1 sample per half year)

* Required for all sites, all others based on SIC codes

No to CSOs (Individual)
Regional Water Quality Boards are Separate from State Water Quality Board
QISP does not need underlying certification
Annual average exceeds the annual NAL (same reporting year)
2 or more results exceed the instantaneous NAL (same reporting year)
Design Criteria Volume Based: 85th percentile 24-hour storm event or 80% of annual runoff volume
Design Criteria Flow Based: max flow rate for 0.2 in per hour or 85th percentile hourly rainfall intensity times 2

Additional Submittals:
Industrial Activity BMP Demonstration - shows BMPs implemented in compliance of permit- Part of Level 2 Tech Report
Non-Industrial Source Pollutant Demonstration - show that exceedance is not due to industrial activities (off-site runoff, non-industrial portion of property, aerial deposition) - Part of Level 2 Tech Report