

Ecology Permit Modifications
Comments from Kitsap County Public Works, Kitsap Surface and Stormwater
Management Program
Mindy Fohn, Water Quality Manager,

Comment 1: Use consistent terms in Sections G3 and G20.

The terms *discharge*, *illicit connection*, and *illicit discharge* are defined in the permit section Definitions and Acronyms. However, *dumping* and *spills* are not defined.

Samples of inconsistent use of the terms include:

1. *G3 Notification of Spill or Discharge*. A “discharge” in the permit is defined as...*any discharge from a MS4 owned or operated by the permittee*. The term “spill” is not defined. Remove the term “spill” to provide clarification.
2. *G3D*. The term “spills” and “discharges” are used to describe the same event. Spills are a subset of discharges. Remove the term “spill” to provide clarification.

Comment 2: Use of consistent terms in the Annual Report Form.

The terms “Illicit discharge”, “Illegal discharge”, “spills” and “connections” and the reporting requirements for tracking spills and illicit discharges creates confusion when tracking and reporting the data.

Questions 21, 22, 26, 27, 31, 33, and 33b use the term “illicit discharges”. However, Question 29 uses the term “illegal discharge” which is not in the Definitions section of the permit and refers to target training audiences. Question 32 requests the permittee to track the number and type of “spills”. “Spills” are not defined in the Definitions section of the permit and is not a term commonly used in previous questions and is used sparingly in the permit. Question 33 requests the permittee to track the number and type of “illicit discharges”. These discharges include spills. Reporting is difficult because it is unclear if the number of spills is included in the number of illicit discharges. Question 34 requests the permittee to track the number of inspections for illicit connections. At Kitsap County inspections for illicit discharges, spills and illicit connections are performed simultaneously.

Recommend using the term “illicit discharge” to replace “spills”, “illicit connections” and “illegal discharge”. The benefits are:

- **Questions 32 and 33 would be combined and will be a more accurate tabulation of the total number of non-stormwater discharges to the MS4.**
- **Tracking by the permittee across multiple departments would result in one term for use on reporting sheets and databases, if used.**

