



## Industrial Stormwater General Permit

December 28, 2018

Friends of Accotink Creek has reviewed the draft Industrial General Permit Reissuance and has the following comments:

1. Permittees with demonstrated high nutrient and sediment loads being discharged to surface waters should be required to monitor more frequently than the 4 times required for the current Industrial General Permit but should instead be required to monitor for each permit reissuance. In this way, it can be determined what discharges may not be in compliance with a TMDL and contributing to failures in meeting nutrient and sediment water quality standards for the receiving water body, and where modifications in a SWPPP may be necessary.
2. Permittees generating loads 10-fold higher than the Waste Load Allocation should not be regulated under the General Permit and should instead be required to apply for coverage under an Individual Permit as they contribute a significant portion of the overall pollutant load to the receiving water body.

Principal Conservator,  
Friends of Accotink Creek

[DEQ Industrial Stormwater General Permit](#)

## Friends of Accotink Creek

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