

IPDES GUIDANCE VOLUME 5

Meeting Date	Comment Date	Commenter	Comment No.	Section	Page	Topic	Comment
2/5/2020	02/11/20	City of Boise	n/a	n/a	n/a	General	The City of Boise appreciates the opportunity to participate in the development of and to provide comments for the IPDES User's Guide to Permitting and Compliance, Volume 5.
2/5/2020	02/11/20	City of Boise	n/a	n/a	n/a	Training and Education	Does DEQ anticipate additional training or certification requirements to support construction general permit implementation?
2/5/2020	2/11/2020	City of Boise	1	1	1	Introduction and Scope of the Guidance Document	Consider separating the user guides for stormwater and biosolids. The potential audiences and content for these two topics differ considerably. - COMMENT RESOLVED, THANK YOU.
2/5/2020	2/11/2020	City of Boise	1.2	3	3	Relationship to Existing Rules	Consider adding narrative that confirms the presence of local government regulations and ordinances related to stormwater management, erosion and sediment control, etc. and explains the relationship between local requirements and the construction general permit program.
2/5/2020	02/11/20	City of Boise	2	4	4	Notice of Intent	The City notes, in the context of City public construction projects, that we have been advised previously that both the City (as owner of the project) and our contractor (as operator of the project) were required to submit an NOI and receive construction general permit coverage. This section appears to only obligate the operator to submit an NOI/receive general permit coverage. Consider updating the guidance to confirm direction and provide clarity on this issue and DEQ's expectations moving forward.
2/5/2020	02/11/20	City of Boise	2	4	4	Notice of Intent	Consider additional guidance to confirm that sites that do not discharge to Waters of the U.S (i.e. onsite retention/infiltration of stormwater, wastewater treatment plants that retain stormwater on site, etc.)
2/5/2020	02/11/20	City of Boise	2	4	4	Notice of Intent	Consider options to streamline to NOI application system as follows: The project NOI could be authorized/signed by the owner and all earth disturbing operators with operational control of daily construction activities. The electronic NOI filing should be editable by the stormwater team coordinator listed in the SWPPP to add operators as needed. This could help the owner /prime contractor keep sub-contractors accountable and give inspectors a point of contact for each subcontractor. Each project would be easier to track, collect annual fees, enforce compliance, and hold each involved party to be accountable. If a violation occurs, you will not need to determine which NOI holder is guilty of the violations committed. This would also help reach the goal of inspecting 10% of all NOI filings
2/5/2020	02/11/20	City of Boise	2.2	5	5	Facility Location and Description	Please confirm that the items listed in Section 2.2 are applicable to all permits. It appears that some of these items may be necessary only for certain types of permits. Additionally, it may be helpful to provide potential data sources for items like drinking water wells, etc.

2/5/2020	02/11/20	City of Boise	4.1.1	8	Fees	Provide additional guidance on the assessment and process for collecting annual renewal fees.
2/5/2020	02/11/20	City of Boise	4.1.2	8	Eligibility	Please consider further defining the meaning of "Protect Historic Properties" or add permit reference if already addressed in the CGP.
2/5/2020	02/11/20	City of Boise	4.1.3	9	Non-Stormwater Discharges	Consider additional clarity or guidance for non-stormwater discharges as discussed during the meeting.
2/5/2020	02/11/20	City of Boise	4.1 and 4.2	n/a	Permit Coverage	Consider the addition of guidance for projects with a common plan of development like a large residential subdivisions where a developer is responsible for site development and a builder, or multiple builders will be responsible for single family home construction. This scenario is also likely applicable to certain large commercial or industrial developments. The guidance should address the compliance responsibilities of developers and builders and identify potential compliance paths to ensure understanding and compliance with CGP requirements. Also, consider options for a builder to submit
2/5/2020	02/11/20	City of Boise	4.6	14	Stormwater Pollution Prevention Plan (SWPPP)	Consider creating or recommending templates for Stormwater Pollution Prevention Plans (SWPPPs) with a specific recommendation for a template for single family home construction within a common plan of development or for single family home construction that disturbs greater than 1 acre. Attached is a link to a similar template developed by the Commonwealth of Virginia to support their CGP program. https://www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPPermits/ConstructionGe
2/5/2020	02/11/20	City of Boise	4.7.2	16	Turbidity Monitoring	Consider additional guidance on turbidity monitoring requirements. We note concerns about the potential for a ten day halt in construction identified in the guidance, consider other alternatives to the
2/5/2020	02/11/20	City of Boise	4.1	17	Compliance and Inspection	Consider additional guidance on compliance and inspection requirements for construction general permit projects located in local jurisdictions with stormwater management and/or erosion control programs.
4/22/2020	05/04/20	City of Boise	N/A	N/A	CGP Guidance	Consider additional action to address the highlighted comments above on lines 6 and 17.
4/22/2020	05/04/20	City of Boise	5.1.2	19	Application Requirements	Consider additional guidance on application requirements identified in IDAPA 58.01.25
4/22/2020	05/04/20	City of Boise	5	N/A	General	Guidance should reference and emphasize the Maximum Extent Practicable compliance standard
4/22/2020	05/04/20	City of Boise	5.4.4		Self Evaluation	Consider developing a framework for permittees to support completion of the self evaluation
4/22/2020	05/04/20	City of Boise	5.4.5		Annual Reporting	Consider developing a template for annual reports