



State of Oregon Department of Environmental Quality  
**New 1200-COLS Permit Requirements**

Category	Old 1200-COLS	New 1200-COLS
<b>Best Management Practices</b>	Implement best management practices (BMPs) that are appropriate for the site and describe the BMPs in a Storm Water Pollution Control Plan (SWPCP).	Meet mandatory BMP requirements (for example, “erosion and sediment control” and “spill prevention and response”). These requirements are narrative technology based effluent limits in the permit.  Describe specific details of BMPs used at the site to meet these requirements in the SWPCP.
<b>Water Quality Based Effluent Limits</b>	Do not cause a violation of in-stream water quality standards.	Do not cause or contribute to a violation of in-stream water quality standards.  Facilities discharging to impaired waters that do not meet the state’s water quality standards must meet additional monitoring requirements.
<b>Benchmarks</b>	Meet statewide stormwater discharge concentration benchmarks for copper, lead and zinc, total suspended solids, pH and oil and grease; also E. coli (for certain landfill and sewage treatment plants).	Meet benchmarks listed at left and meet EPA’s sector-specific benchmarks for certain industrial sectors (for example, pulp mills and automobile salvage yards).
<b>Other Pollutants</b>	None	Monitor for a broader suite of metals (cadmium, chromium and nickel) to determine if they are present in industrial stormwater.
<b>Benchmark Exceedances</b>	Within 30 days of receiving water quality sample results that exceed a benchmark concentration, submit Action Plan that contains (1) results of review, (2) a corrective action, (3) and an implementation schedule.	Complete Tier I corrective actions are required when stormwater sample results exceed benchmark or impairment reference concentrations. Tier I requirements are similar to responses in the current permit, except only submit to DEQ or Agent changes made to SWPCP based on investigation. Retain Tier I corrective action report on site and submit to DEQ or Agent upon request.  Tier II corrective actions are required if a second-year geometric mean concentration exceeds a benchmark. Must implement treatment BMPs within two years. Professional engineer or certified engineering geologist must design and stamp the portion of the SWPCP addressing the treatment measures.
<b>Sampling</b>	Sample 4 times per year. Samples must be collected at least 14 days apart.	Added requirement to monitor during first 12 hours of a stormwater discharge event.
<b>Monitoring Waiver</b>	Monitoring waiver can be obtained for individual parameters after four consecutive samples collected are at or below the benchmark or exceedance due to background or natural conditions.	Monitoring waiver can be obtained for individual parameters after four consecutive samples are at or below the benchmarks based on geometric mean evaluation or due to background natural conditions.
<b>Inspections</b>	Monthly inspections of areas where potential spills of significant materials or industrial activities occur, and where stormwater control measures, structures, catch basins, and treatment facilities are located.	Continued inspection of items listed at left and broadened what needs to be inspected. Clarified that visual observations of stormwater discharge can occur during the monthly inspection. Require facilities to document inspection results.
<b>Documentation</b>	Maintain and submit to DEQ or Agent all records of inspection, maintenance and repair, education activities, and any spills.	Identified priority reports that must be submitted to DEQ or Agent and reports that are retained on site (and only submitted upon request), such as: <ul style="list-style-type: none"> <li>• Continue to submit Discharge Monitoring Reports to DEQ or Agent on an annual basis;</li> <li>• Retain/submit only if requested routine benchmark exceedance reports (Tier I corrective action) and monthly inspection reports.</li> </ul>