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Posted To: Industrial Stormwater Comments

Conversation: copper benchmarks, an alternative approach

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The dominant source of copper in stormwater is from brake pads. The proposed benchmarks and action levels for copper are very low and nearly every industrial permittee is bound to have repeated exceedances of benchmark and action levels, necessitating frequent level 1, 2 and 3 and perhaps even 4 responses. The problem is that there is little that these permittees can do in the way of source controls to address the ubiquitous copper source that is from essentially all vehicles.

A different approach is more appropriate. That approach is a society wide source control measure, and that has to be a change in brake pad composition. Presumably bright minds are already working on this solution, but it is not available yet. What can be done now is to work to set up a process to assure that when safe, effective, non-copper, or greatly reduced copper brake pads are available, that they be implemented throughout the state as rapidly as possible. I suggest that a rebate system be offered to speed up the replacements, and that when applying for relicensing of vehicles, proof of brake pad changes be required. Once the non-copper, or greatly reduced copper brake pads are available, the use of copper based brake pads should be no longer allowed on either new vehicles, or on any brake repair jobs. Used cars sold by dealers should have the brake pads replaced, with the dealers eligible to receive the rebates just like anyone else. Vehicle fleets should replace their brake pads, with the operators of those fleets also eligible for rebates just like anyone else.

I propose that funds for the rebates could be, and should be raised from a wide number of sources, which would benefit, and would individually not have to be tapped very hard. Essentially, the consumer pays for what ever means are tapped to fund the rebates, and the consumer receives the rebates in return for making the needed change. I think that municipalities should be willing to pay some, as they will benefit from not having to address copper in stormwater by more costly means. I think that monies available to the new Puget Sound Partnership could also be contributed, as it would be a program benefiting the urban and rural streams bordering Puget Sound. I think that the state should contribute since the state Department of Transportation would benefit from not having to address copper in stormwater by more costly means. I think that holders of general stormwater permits, be they municipalities or industries, should be willing to contribute some as they would benefit from not having to expend greater resources on treatment methods because the societal source control best addresses the issue. I don't know how these different groups will react to this proposal, but I think it makes more sense than imposing strict and escalating responses on industrial or other permittees that will accomplish little.

Setting up a system, that would be rapidly implemented when the necessary brake pad alternatives become available, would send a message to brake pad manufacturers that there is a significant market available for the new brake pads. Perhaps other states would want to follow the state's lead.

The above approach is something that I think many groups would be willing to work for, and it makes more sense than the proposed copper benchmarks and action levels, and associated responses called for in the draft industrial stormwater general permit.

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