

Crop Production Services



10428 W. Aero Road
Spokane, WA 99224-9405

July 14, 2009

Mr. Jeff Killelea
Department of Ecology
PO Box 47600
Olympia, WA

Subject: Draft Washington State Industrial Storm Water Permit

Dear Mr. Killelea,

Our company appreciates the opportunity to comment on the Drift Industrial Storm Water General Permit. We have 20 business locations in eastern Washington, and one in Western Washington, that market agricultural fertilizers and crop protection products. As a business in the Agricultural Industry that may be impacted by this permit, we have the following concerns:

- This permit is 71 pages long with a 119 page Fact Sheet. It includes 58 requirements for our business to comply with. This is longer and more complicated than it should be. After the initial reading, there may be implications to our business that will require a lot more time to digest and understand, but will likely require the employment and expense of a third party consultant.
- The permit requires the identification and installation of the best management practices from the Storm Water Technical Manual to achieve All Known and Reasonable Treatment Technology (AKART). The rule is lengthy and vague on specifics resulting in the need for our company to employ a third party consultant.
- This permit also changes the action levels, but due to the complexity of the rule it is not known, but suspected, that we may be required to install extensive and expensive new treatment systems.

The rule is complicated and lengthy. The rule suggest that our industry we will be impacted by additional costs and expense at a critical time in our economy. There is good reason to slow this process down and hold meetings with stakeholders. Having only a few days to send in comments for a rule and fact sheet that total 190 pages only underscores the necessity to slow down this process. It is in everybody's best interest to ensure the rule is ultimately advantageous.

Sincerely,

John P Massey, Jr
Manager, Operations Compliance