

July 13, 2009

Jeff Killelea
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

DEPARTMENT OF ECOLOGY

JUL 14 2009
WATER QUALITY PROGRAM

Dear Mr. Killelea:

I am sure you are a nice guy but it is clear you don't understand much about small businesses because this new stormwater permit you are proposing will kill the small business that I work for. I have worked as a auto dismantler for 2 years and would like to keep my job.

Now the state wants to put my employer out of business. Why?

This permit and the fact sheet are about 200 pages long. It's filled with a bunch of very technical information and lots of do's and don'ts that frankly, We don't understand.

Why is the Department writing such a confusing and challenging document for us to have to deal with?

I understand that the permit will require that copper in my stormwater must be cleaner than it is from most public drinking water. That about says it all. This new requirement for copper is way too low. By the way, most of the copper in the water comes from roads and highways were people drive and use their brakes. Our operations aren't where most of the copper is coming from. If you kill our businesses and all the good we do for the state and its citizens, you still will not solve the copper problem because we aren't the problem.

No visible sheen of oil on our stormwater. That's usually the case in our facility, but once in a while there may be a sheen for a short time. That puts me in violation of this new permit and you can put me out of business because of that. No problem, let the state spend a few million of taxpayer money a year to build some very fancy facility to handle junk vehicles. They will still probably have a visible oil sheen on their stormwater from time to time. So what have you accomplished? NOTHING!

If you put us out of business, you'll have a bunch of illegal guys junking cars in the back woods. They cut the hoses and let the anti-freeze drain on the ground, the CFC's go into the air, and they can throw the lead weights on the ground too. That will protect the environment far better than what we are doing, right? And, you will never find them and you'll never catch them. You will only find where they have been.

This draft permit will do more environmental harm than you can imagine by putting legitimate vehicle wreckers out of business and replacing them with illegal operations or forcing the state to spend millions a year to do what we are already doing. Instead of us making money for the state, it will cost the state money.

It is clear that the Department really doesn't understand the auto wrecking industry or the illegal operations that are ready to take our place. If it did, it would re-write this permit so our businesses can stay in business, keep providing honest jobs, keep collecting taxes for the state, and keep managing the junk vehicles in an environmentally responsibly way.

The Department has a big decision to make. Fix this permit to keep our yards in business to protect the environment, or let the illegals take over after we are put out of business and watch the huge environmental damage they will do.

Respectfully,

William Drake
9900 Mullen Rd Se
Lacey, WA 98503

cc: Governor Gregoire, Senator Karen Fraser, Representative Brendan Williams and
Representative Sam Hunt

