



July 15, 2009

File No.: 1-127080-000

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

Subject: Washington State Industrial Storm Water Permit

Dear Mr. Killelea:

The Teck Washington Incorporated Pend Oreille Mine located in Metaline Falls, WA appreciates the opportunity to comment on the Draft Industrial Stormwater General Permit. As a business in the mining industry that will be covered by this permit we have the following concerns:

- This permit is 71 pages long (with a 19 page Fact Sheet) and has 58 requirements in it for our company to comply with. This adds additional work for our limited environmental management staff and could potentially lead to the use of outside consultants or legal counsel in order to understand these provisions to avoid citizen's suits or agency enforcement.
- This permit has extensive requirements to identify and install best management practices from the Stormwater technical manual to achieve All Known and Reasonable Treatment Technology (AKART). Due to the complexity of the manual and in determining what AKART means to the Teck Pend Oreille Mine site, there will likely be an increased need for help from Ecology staff and outside expertise to understand the requirements and evaluate the site.
- This permit changes the action levels at which Teck will have to potentially increase storm water management response. The new levels are so strict that based on industry norms there is the potential need to install extensive new treatment systems which ultimately leads to more human and capital resources to install and manage new systems. Along with obvious impacts to the Mine operating budget, this may also increase the request for help from Ecology staff in determining what will be required.

Thank you for considering our comments. If you have any questions, please contact me at 509-459-4451.

Sincerely,
Teck American Incorporated



Kris R. McCaig
Senior Environmental Coordinator

cc: David Godlewski - Teck, Spokane, WA
Mark Brown – Teck Washington Pend Oreille Mine
Kevin Dunn – Teck Washington Pend Oreille Mine