

# WASHINGTON STATE DEPARTMENT OF ECOLOGY

## RESPONSE TO PUBLIC COMMENTS

Sound Refining, Inc.  
NPDES PERMIT WA 000320-4

March 22, 2007

Ecology published a public notice for issuance of the NPDES permit for Sound Refining, Inc. on **January 31, 2007** in Tacoma's *The News Tribune*. In the notice we invited public evaluation of the proposed permit and provided for a 30 day public comment period. The deadline for submittal of written comments was March 7, 2007. Ecology received written comments from Puget Soundkeeper Alliance (PSA).

Ecology changed the permit, where appropriate, to improve clarity and to address the comments. We described these changes in this Response to Comments. We addressed all of the comments received in this document. The original comment letter comprises part of the legal record of this facility's permit. The record is available for public review at Ecology's Industrial Section office in Lacey. Anyone interested in reading the full text of the comment letter or in obtaining a copy of a particular comment should call Arlene Army in Lacey at 360/407-6930.

Comments appear in bold text, followed by Ecology's response in regular text. Our response includes the reasons for making, or not making, changes to the permit.

Ecology will send a copy of this response to comments to each individual who provided written comments.

### **Mixing Zone & AKART**

**Mixing zones may only be approved when a permittee fully applies "all known available and reasonable methods of treatment" (AKART). In the draft fact sheet, Ecology acknowledges that oil/water separators are considered AKART for petroleum handling facilities like Sound Refining, Inc. Because Sound Refining has been able to achieve the same oil & grease limits with weir-boxes and its current best management practices, Ecology is not requiring the use of oil/water separators. PSA appreciates that oil/water separators may not result in substantial benefit to water quality in this case. Ecology must demonstrate the facility is applying AKART where mixing zones are approved.**

## Ecology Response:

Oil water separators are considered to be AKART for petroleum contaminated stormwater however Sound Refining's stormwater discharges do not contain oil unless there is a spill to containment.

Outfall's 002 and 004 drain the tank farms. These discharge points include valves which are normally closed. Sound opens the valves to discharge after their staff verifies that there is no oily sheen in the tank farms at the discharge point.

Outfall 003 has very little potential to contain oil since it does not flow through the tank farms or through the process areas. This discharge consists mostly of spring water that flows through the property. Sound is considering enclosing this spring which runs along a road within the refinery property. This would eliminate the potential for contamination of this spring water. If oil is observed in the ditch or if there is a spill, the valved outfall can be closed. Sound can shut in the discharge and run the spilled material and runoff through their wastewater treatment system.

If Sound observes an oily sheen in the standing stormwater in the tank farms they do not open the valve to discharge stormwater. Using a trash pump, Sound diverts any oil contaminated stormwater to the wastewater treatment system. The wastewater system, which treats all process wastewater and process area stormwater, includes an API separator and additional treatment units. Sound discharges this pretreated wastewater into the City of Tacoma's wastewater collection system. The City of Tacoma issued a pretreatment permit for this wastewater discharge. Ecology considers that the combination of these best management practices and treatment is AKART.

## Stormwater Benchmarks

**The draft permit adopts benchmarks from Ecology's Industrial Stormwater General Permit (ISGP) for several parameters for which effluent limitations have not been set. Among these parameters is copper, the current benchmark for which is 63.6 µg/l. The 2007 Draft ISGP drastically reduces the copper benchmark to 11.9 µg/l. This change is proposed in light of new information demonstrating adverse impacts to threatened and endangered fish from very low concentrations of this metal. Ecology should either immediately confirm Sound Refining Inc.'s permit to the draft ISGP copper benchmark or specifically state that changes in the ISGP benchmarks will trigger a modification of those in Sound Refining Inc.'s permit.**

**The draft permit also sets the BOD benchmark at 60 mg/l. This is inconsistent with the current ISGP as well as the proposed draft ISGP, both**

**of which establish a much lower BOD benchmark of 30 mg/l. Ecology should change the BOD benchmark to 30 mg/l.**

Ecology Response:

Ecology used the current general stormwater permit in addition to the effluent guidelines for Petroleum refineries to develop permit limits for Sound Refining. The copper benchmark we proposed in the NPDES permit is from the current Industrial Stormwater General Permit (ISGP). Since the values in the proposed ISGP may change through the review and potential appeal process we feel it is inappropriate to use draft permit limits in the Sound Refining NPDES permit. When the ISGP is finalized we have the option to reopen the permit to change the permit limits. All NPDES permits include a re-opener clause (General Condition G3) that allows Ecology to make changes during the permit term.

The current and draft ISGP does not include a BOD benchmark value for industrial stormwater dischargers except for those that discharge to 303d listed waters and for special category dischargers. The benchmark value that we chose for this discharge was an error; we used the action level value by mistake. We changed the benchmark value to 30 mg/l in the final Sound NPDES permit. The BOD of the discharge at Sound Refining generally measures at non-detect levels. No BOD values were measured above 10mg/l since 1999 as shown in the fact sheet appendices and included here for your convenience (see attached tables). If BOD values continue at low levels Ecology may eliminate monitoring requirements for this parameter in the next permit.

### **Required Actions for Exceedance of Benchmark Values**

**The draft permit incorporates some of the Industrial Stormwater General Permit's (ISGP) adaptive management strategy by requiring Sound Refining Inc. to take certain actions each time sampling results exceed benchmarks. Among these actions is evaluating whether any improvements or changes to source control/operational Best Management Practices (BMPs) are warranted and, if so, implementing these BMPs. To reflect improvements in the draft ISGP, Ecology should establish a timeframe for these tasks to be completed. At a minimum, the permit should require Sound Refining to establish and adhere to an implementation schedule for the improvements.**

Ecology Response:

Ecology changed the proposed permit to require Sound to implement additional source/operational control and best management practices as identified as needed in the investigation within 30 days after receipt of sampling results exceeding the benchmark.

## **Visual Monitoring**

**Condition S1.E. requires Sound Refining to conduct visual monitoring. Condition S9.C. indicates only two inspections are required: once during the wet season and once during the dry season. This inspection frequency appears inadequate. For example, facilities permitted under the existing IGSP must do visual monitoring at least quarterly. Under the draft ISGP, visual monitoring must be done each month from October through June, every time a stormwater discharge is sampled, and once during the dry season. Visual inspections are a simple, inexpensive way to ensure BMPs are properly implemented and effective. Ecology should require visual monitoring on a monthly basis.**

### **Ecology Response:**

Sound Refining conducts visual monitoring at least three times per day as required in the best management practices listed in Condition S8.1 of the proposed permit. They also visually monitor the discharge whenever they collect a sample. Sound reports these observations on the monthly discharge monitoring report.

## **Stormwater Pollution Prevention Plan**

**PSA supports the provision making the Ecology-approved stormwater pollution prevention plan (SWPPP) an enforceable component of Sound Refining Inc.'s permit. However, we are somewhat bewildered by the permit provision for incorporating facility-specific BMPs at a later date (Condition S8). As the permit initially identifies required BMPs, it would seem that replacing or amending these in a later-approved separate document would, in effect, be a permit modification without compliance with the public notice and participation provisions of WAC 173-220-290. This is especially problematic since, unlike the ISGP, Sound Refining's permit does not provide for public access to the facility's SWPPP. The permit should indicate that any facility-specific BMPs will be incorporated through a formal permit modification after public notice and opportunity for participation. The permit should also provide for public access to the facility's SWPPP.**

**The draft allows Sound Refining 90 days to develop a SWPPP. Since Sound Refining was required to develop a SWPP during its last permit, it does not seem reasonable to allow three more months following the effective date of the permit to complete this task. Ecology should require Sound Refining to submit an updated SWPPP within 30 days of the effective date of the permit.**

Ecology Response:

Sound Refining currently implements stormwater best management practices (BMPs) some of which Ecology listed in Permit Condition S.8. Although these management practices are not identified as a Stormwater Pollution Prevention Plan (SWPPP) they include many of the necessary elements of a SWPPP. Because they have effective management practices in place Ecology believes that 90 days is not an unreasonable timeframe to develop the SWPPP.

Sound must formalize their BMPS in the form of a SWPPP and determine if any additional BMPs are necessary. Ecology will only accept additional BMPs which are more stringent than those currently identified. We asked Sound to clearly identify the management practices they use when there is a spill that might contaminate stormwater, including diversions to the wastewater treatment system. Unlike industries covered under general permits, Sound must submit the Stormwater Pollution Prevention Plan to Ecology for review and approval. In addition, Ecology is very familiar with Sound's operation since we inspect the facility several times a year. Ecology keeps copies of the SWPPP and other permit documents in our files which are available for public review. If you wish to review Sound's documents please contact our public disclosure coordinator, Kathy Vermillion at (360) 407-6916 or at [kver461@ecy.wa.gov](mailto:kver461@ecy.wa.gov).

Sound Refining, Inc.

Permit effective date: July 1, 1999

Values are monthly averages.

pH values are the value furthest from 7.0 during monthly sampling.

Stormwater	Outfall 002					Outfall 003					Outfall 004					Rainfall (inches)		Production
Year 1999	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	Maximum	Total	BBLs total
July-99	No discharge					1.7	7.20	2.0	0.25	5.0	1.1	6.92	0.0	0.0	12.1			96038
August	No discharge					1.9	7.01	7.0	0.85	10.0	0.8	6.84	3.5	1.0	12.0	0.5	0.62	0
September	No discharge					0.6	7.00	1.0	1.55	6.0	1.3	6.68	6.0	2.4	0.0	0.12	0.12	19260
October	No discharge					1.1	7.23	14.0	0.55	2.0	1.1	6.86	1.0	1.3	15.1			0
November	No discharge					0.7	7.27	25.0	0.05	4.0	0.2	6.71	3.5	0.3	13.0	1.7	10.2	0
December	No discharge					0.7	7.66	18.5	5.05	30.0	4.0	6.29	7.5	0.0	15.0	1.4	4.15	0
Stormwater	Outfall 002					Outfall 003					Outfall 004					Rainfall (inches)		Production
Year 2000	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	Maximum	Total	Barrels
January-00	No discharge					1.6	6.95	4.0	1.60	2.0	0.4	6.43	2.5	2.3	0.0	1.25	4.96	0
February	No discharge					0.5	6.81	13.0	0.50	2.0	0.9	6.38	4.5	1.3	12.9	0.85	4.35	0
March	No discharge					1.1	6.93	57.5	0.10	0.0	1.4	6.34	1.0	0.1	13.0	0.42	2.17	0
April	No discharge					1.5	7.05	0.0	0.65	1.0	3.0	6.40	4.0	1.3	8.0	0.38	0.90	0
May	No discharge					0.9	7.01	0.0	0.55	2.0	1.0	6.53	7.5	0.0	2.0	0.42	1.86	0
June	No discharge					0.7	7.10	0.0	2.10	0.0	2.5	6.63	2.0	2.0	20.0	0.30	1.20	0
July	No discharge					1.5	6.98	0.0	1.30	5.0	1.8	6.77	8.5	1.1	17.8	0.20	0.31	0
August	No discharge					0.7	6.95	0.0	0.65	4.0	0.7	6.79	1.5	0.2	28.0	0.09	0.25	0
September	No discharge					0.2	4.24	2.5	0.25	2.0	1.1	6.76	0.0	1.6	49.0	0.14	0.48	0
October	No discharge					0.1	7.52	6.5	2.95	14.0	1.3	7.12	14.5	3.9	106.0	0.85	4.03	0
November	No discharge					0.9	6.98	1.0	5.45	8.0	1.5	6.80	2.5	6.5	25.8	0.80	3.30	0
December	No discharge					2.3	7.53	9.0	0.55	4.0	1.1	7.10	1.0	0.8	15.9	0.22	2.17	0

Stormwater	Outfall 002					Outfall 003					Outfall 004					Rainfall (inches)		Production
Year 2001	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	Maximum	Total	Barrels
January-01	No discharge					0.35	7.40	0.0	1.15	2.0	0.2	7.16	3.0	0.70	19.8	0.45	2.45	0
February	No discharge					1.15	7.35	0.8	0.60	2.0	0.1	6.56	2.0	1.60	19.9	0.80	2.20	0
March	No discharge					2.40	6.70	4.5	1.05	2.0	2.2	6.83	9.5	1.75	11.0	0.38	2.63	0
April	No discharge					1.70	7.52	8.5	0.60	2.0	1.2	7.11	4.0	0.60	16.0	0.89	3.07	0
May	No discharge					0.70	7.52	1.5	0.50	4.4	0.2	7.09	1.0	0.55	20.0	0.48	1.25	0
June	No discharge					1.40	7.54	1.5	1.17	0.0	0.8	7.16	2.0	2.15	51.8	0.85	2.96	0
July	No discharge					0.60	7.39	2.5	0.90	2.0	0.0	7.29	1.0	0.85	42.2	0.06	0.20	0
August	No discharge					0.25	7.37	2.0	0.80	3.0	2.3	6.58	2.0	0.80	40.0	0.94	2.25	0
September	No discharge					0.25	7.42	1.0	1.55	6.0	1.7	7.65	0.0	1.30	28.0	0.28	0.57	0
October	No discharge					<0.5	7.61	3.0	<2.0	3.0	<0.5	7.43	2.5	<2.0	24.3	0.54	2.99	0
November	No discharge					0.25	7.57	1.0	<2.0	0.0	0.7	7.01	22.5	<2.0	12.2	2.84	9.53	0
December	No discharge					0.95	7.33	2.5	<2.0	9.8	2.5	7.21	1.0	<2.0	7.04	0.92	6.25	0

Stormwater	Outfall 002					Outfall 003					Outfall 004					Rainfall (inches)		Production
Year 2002	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	Maximum	Total	Barrels
January-02	No discharge					1.80	7.50	0.0	0.0	0.0	1.8	7.30	2.5	0.00	6.0	2.48	6.66	0
February	No discharge					2.35	7.48	3.5	9.25	6.0	0.5	7.32	1.0	7.27	3.0	0.76	3.37	0
March	No discharge					0.95	7.51	1.0	<2.0	1.98	<0.5	7.37	1.5	<2.0	11.0	0.98	3.74	25789
April	No discharge					2.80	7.51	1.0	<2.0	5.0	<0.5	7.56	2.0	<2.0	78.0	0.55	3.13	53274
May	No discharge					0.5	7.43	1.5	<2.0	6.0	0.8	7.34	0.0	<2.0	3.98	0.40	1.93	0
June	No discharge					<0.5	7.55	2.0	<2.0	18.0	<0.5	7.27	2.25	<2.0	28.0	0.24	1.00	0
July	No discharge					<0.5	7.27	4.0	<2.0	4.0	<0.5	6.93	3.5	<2.0	15.0	0.16	0.52	0
August	No discharge					<0.5	7.29	1.0	<2.0	3.0	<0.5	7.15	4.0	<2.0	36.1	0.02	0.05	0
September	No discharge					0.5	7.55	1.0	<2.0	8.0	<0.5	7.54	0.0	<2.0	18.1	0.08	0.24	0
October	No discharge					<0.5	7.55	10.5	<2.0	8.0	0.3	7.58	0.1	<2.0	9.0	0.24	0.78	0
November	No discharge					1.2	7.41	14.0	<2.0	0.0	0.7	7.52	4.0	<2.0	3.0	0.35	2.75	0
December	No discharge					0.4	7.66	2.0	<2.0	5.0	0.7	7.67	1.0	<2.0	16.1	0.66	6.58	0

Stormwater	Outfall 002					Outfall 003					Outfall 004					Rainfall (inches)		Production
Year 2003	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	Maximum	Total	Barrels
January-03	No discharge					<0.5	7.28	2.5	<2.0	7.9	0.8	7.12	0.5	<2.0	28.0	0.75	7.22	0
February	No discharge					0.4	7.59	0.0	<2.0	4.0	<0.5	7.29	1.5	<2.0	6.0	0.19	1.31	0
March	No discharge					0.5	7.49	2.0	<2.0	0.0	<0.5	6.99	3.0	<2.0	23.5	0.74	4.35	0
April	No discharge					<0.5	7.49	0.0	<2.0	7.9	0.3	7.28	2.5	<2.0	10.0	0.36	2.91	0
May	No discharge					1.9	7.45	0.5	<2.0	3.0	<0.5	7.52	1.0	<2.0	13.9	0.16	0.50	0
June	No discharge					2.2	7.42	0.0	<2.0	3.0	0.8	7.54	2.0	<2.0	14.7	0.15	0.27	0
July	No discharge					2.2	7.51	0.5	<2.0	3.0	2.6	7.78	0.0	<2.0	20.0	0.05	0.05	0
August	No discharge					2.3	7.51	1.5	<2.0	3.0	1.4	7.63	4.5	<2.0	19.0	0.09	0.18	0
September	No discharge					2.4	7.37	2.5	<2.0	0.0	2.5	7.43	66.0	<2.0	35.8	0.56	1.11	0
October	No discharge					1.6	7.04	0.5	<2.0	29.9	<0.5	7.22	0.0	<2.0	18.8	3.88	8.27	0
November	No discharge					1.5	7.29	0.0	<2.0	12.9	1.2	6.86	14.5	<2.0	24.8	0.62	5.34	0
December	No discharge					3.8	7.35	5.8	9.9	3.0	3.8	6.75	6.3	9.8	30.8	0.34	4.04	0
Stormwater	Outfall 002					Outfall 003					Outfall 004					Rainfall (inches)		Production
Year 2004	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	Maximum	Total	Barrels
January-04	No discharge					3.9	7.35	4.0	<2.0	7.9	1.1	6.55	0.0	<2.0	0.0	1.25	6.14	0
February	No discharge					5.8	7.36	1.0	<2.0	7.9	1.4	7.09	5.5	<2.0	69.3	0.40	2.29	0
March	No discharge					3.3	7.37	1.5	<2.0	8.9	<0.50	6.67	2.5	<2.0	7.0	0.32	1.75	0
April	No discharge					1.9	7.37	0.0	<2.0	7.0	4.9	6.76	2.5	<2.0	10.0	0.22	0.67	0
May	No discharge					4.5	7.16	29.5	2.6	16.3	2.2	7.20	5.3	2.6	9.9	0.19	1.98	0
June	No discharge					7.8	7.33	4.5	NA	5.96	4.0	6.85	NA	<2.0	<2.0	0.18	0.53	0
July	No discharge					<2.0	7.42	2.0	<2.0	5.0	<2.0	7.56	2.0	<2.0	3.0	0.00	0.00	0
August	No discharge					<2.0	6.91	0.4	<2.0	<2.0	<2.0	7.17	0.5	<2.0	<2.0	0.73	2.89	0
September	No discharge					<2.0	7.70	0.8	<2.0	<2.0	<2.0	7.48	2.2	<2.0	4.0	0.81	2.89	0
October	No discharge					1.2	7.19	1.2	<2.0	<2.0	3.0	7.56	5.8	<2.0	9.0	1.02	3.54	0
November	No discharge					2.8	7.40	49	<2.0	<2.0	3.7	7.23	13.0	<2.0	<2.0	0.68	2.96	0
December	2.1	6.93	28.0	<2.0	<2.0	2.5	7.43	1.7	<2.0	<2.0	6.6	7.46	1.7	<2.0	<2.0	0.52	3.70	0

Stormwater	Outfall 002					Outfall 003					Outfall 004					Rainfall (inches)		Production
Year 2005	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	Maximum	Total	Barrels
January-05	4.5	7.42	34.2	7.0	41	<2.0	6.85	<0.5	<2.0	7.0	<2.0	7.18	<0.5	<2.0	12.0	1.10	3.67	0
February	<2.0	6.7	24.0	3.0	140	<2.0	7.45	0.7	<2.0	<2.0	<2.0	7.25	<0.5	<2.0	<2.0	0.44	0.97	0
March	No discharge					1.4	6.78	1.3	<2.0	<2.0	2.0	6.75	10.0	<2.0	<2.0	0.38	3.87	0
April	3.3	6.16	27.0	<2.0	20	2.0	7.27	0.7	<2.0	<5.0	<2.0	7.06	1.0	<2.0	10.0	0.77	4.38	0
May	1.3	6.4	29.0	3.0	40	2.1	7.53	1.0	<2.0	<5.0	<2.0	7.19	1.3	<2.0	5.0	0.98	3.98	0
June	1.3	7.1	14.0	9.0	42	<2.0	7.27	1.0	<2.0	<5.0	<2.0	6.93	1.0	<2.0	7.0	0.31	1.80	0
July	<2.0	5.57	3.0	17.0	27	<2.0	7.05	1.0	4.0	<5.0	<2.0	6.96	1.0	4.0	<5.0	0.44	1.69	0
August	No discharge					8.0	7.23	1.0	<2.0	<2.0	<2.0	7.19	<0.5	<2.0	<2.0	0.02	0.02	0
September	No discharge					<2.0	7.43	2	3	7	No discharge					0.65	0.93	0
October	No discharge					2.2	7.22	1.5	<2.0	4	2.2	6.41	5	<2.0	10	0.95	3.42	0
November	2.8	5.86	7.8	2	23	<2.0	7.08	2	<2.0	39	2.5	6.10	5.5	<2.0	<2.0	0.93	5.43	0
December	<2.0	7.16	8.3	<2.0	8	<2.0	7.54	4.2	3	40	4.5	7.29	17	<2.0	18	1.50	7.54	0
Stormwater	Outfall 002					Outfall 003					Outfall 004					Rainfall (inches)		Production
Year 2006	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	O&G	pH	TSS	BOD	COD	Maximum	Total	Barrels
January-06	<2.0	6.46	21	3	22	<2.0	6.65	6	<2.0	14	<2.0	6.72	11	<2.0	<2.0	1.90	12.43	0
February	No discharge					2.9	7.78	4	<2.0	2	<2.0	7.07	6.4	<2.0	16	0.44	2.43	0
March	No discharge					<2.0	6.84	2.8	<2.0	<2.0	No discharge					0.42	2.59	0
April	No discharge					<2.0	7.41	2.4	<2.0	<2.0	<2.0	6.78	10	<2.0	8	0.88	2.58	0
May	<2.0	7.4	31	<2.0	<2.0	<2.0	7.59	<2.0	2	3	No discharge					0.57	2.11	0
June	<2.0	8.1	21	17	101	<2.0	7.8	2	<2.0	<2.0	No discharge					0.34	2.34	0
July	<2.0	7.8	6	<2.0	14	<2.0	7.6	<2.0	<2.0	<2.0	No discharge					0.06	0.13	0
August	2.1	7.6	1.2	<2.0	<2.0	<2.0	7.9	2.8	<2.0	<2.0	No discharge					0.00	0.00	0
September	2.4	7.65	2.8	19	37	2.8	7.7	<2.0	7.0	<2.0	<2.0	7.40	<2.0	7.0	10	0.36	0.92	0
October	2.8	7.6	41	3	13	<2.0	7.8	1.3	<2.0	10	4	8.20	4	3	26	0.53	1.58	0
November	3	8	47	8	10	2.1	7.8	22	2	4	2.4	7.20	68	3	24	3.44	16.46	0
December																		

**Stormwater First Flush Sampling**

**Sound Refining, Inc.**

		General Parameters in mg/L							
Date		TSS	BOD	pH	diesel	oil	gasoline	COD	O&G
10/9/2000	003	6.5	2.95	7.52	<0.25	<1.0	<0.25	14	0.1
10/9/2000	004	14.5	3.9	7.12	<0.25	<1.0	<0.25	106	1.3
12/16/2003	003	4	9.9	7.39	<0.05	<0.5	0.072	2.97	<0.5
12/16/2003	004	8	9.8	6.51	<0.05	<0.5	<0.05	30.8	1.3
5/26/2004	003	3.5	<2	7.27	<0.05	<0.5	<0.05	5	<2
5/26/2004	004	1	<2	7.1	<0.05	<0.5	<0.05	12	<2
5/27/2004	003	84	2.57	6.75	<0.1	<0.5	<0.05	33.8	<2
5/27/2004	004	11	2.6	7.24	<0.1	<0.5	<0.05	9.9	<2
2/28/2005	002	1.3	<2	7.23	<0.1	<0.5	<0.05	<2	<2
2/28/2005	003	0.7	<2	7.36	<0.1	<0.5	<0.05	<2	<2
2/28/2005	004	3	<2	7.17	<0.1	<0.5	<0.05	<2	<2
10/6/2005	003	1.5	<2	7.22	<0.1	<0.5	<0.05	4	2.2
10/6/2005	004	5	<2	6.41	<0.1	<0.5	<0.05	10	2.2
12/19/2005	003	5	<2	6.81	<0.1	<0.5	<0.05	<2	<2
12/19/2005	004	17	<2	7.53	<0.1	<0.5	<0.05	18	<2
4/3/2006	003	2.4	<2	7.44	<0.1	<0.5	<0.05	<2	<2
4/3/2006	004	10	<2	6.95	<0.1	<0.5	<0.05	8	<2
11/2/2006	002	47	8	6.04	<0.1	<0.5	<0.05	10	2.5
11/2/2006	003	22	2	7.09	<0.1	<0.5	<0.05	4	2.2
11/2/2006	004	68	3	6.87	<0.1	<0.5	<0.05	24	2.8

**Stormwater First Flush Sampling**

**Sound Refining, Inc.**

Date		Metals - Priority Pollutant Parameters units in ug/L												
		Sb	As	Be	Cd	Cr	Cu	Pb	Hg	Ni	Se	Ag	Tl	Zn
10/9/2000	003	<50	<50	<1	<3	<7	<10	<40	<0.5	<15	<80	<7	<2	18
10/9/2000	004	<50	<50	<1	<3	<7	<10	<40	<0.5	17	<80	<7	<2	160
12/16/2003	003	<30	<50	<1	<3	<7	9	<40	<0.5	<15	<80	<7	<40	39
12/16/2003	004	<30	<50	<1	<3	<7	13	<40	1000	<15	<80	<7	<40	85
5/26/2004	003	<30	<50	<1	<3	<7	<6	<40	<0.2	<15	<80	<7	<1	13
5/26/2004	004	<30	<50	<1	<3	<7	<6	<40	<0.2	<15	<80	<7	<1	24
5/27/2004	003	<30	<2	<1	<3	35	20	8	<0.4	16	<5	<7	<1	110
5/27/2004	004	<30	<2	<1	<3	20	8	<1	<0.4	<15	<5	<7	<1	60
2/28/2005	002	<5	<2	NA	NA	NA	NA	NA	<0.2	<15	NA	NA	<1	NA
2/28/2005	003	<5	<2	NA	NA	NA	NA	NA	<0.2	<15	NA	NA	<1	NA
2/28/2005	004	<5	<2	NA	NA	NA	NA	NA	<0.2	<15	NA	NA	<1	NA
10/6/2005	003	<30	<50	<1	<3	<7	<6	<40	<0.2	<15	<80	<7	<1	<6
10/6/2005	004	<30	<50	<1	<3	<7	7	<40	<0.2	<15	<80	<7	<1	100
12/19/2005	003	<1	<2	<1	<3	<7	<6	<2	<0.0002	<15	<5	<7	<2	17
12/19/2005	004	<2	<2	<1	<3	<7	<6	<2	<0.0002	<15	<5	<7	<1	88
4/3/2006	003	<5	<2	<1	<3	<7	<6	<1	<0.2	<15	<5	<7	<1	8
4/3/2006	004	<5	<2	<1	<3	15	6	<1	<0.2	<15	<5	<7	<1	96
11/2/2006	002	<2	<2	<1	<3	<7	10	32	<0.2	<15	<5	<7	<1	12
11/2/2006	003	<30	<50	<1	<3	<7	8	<40	<0.2	<15	<80	<7	<1	47
11/2/2006	004	<30	<50	<1	<3	<7	15	<40	<0.2	<15	<80	<7	<1	270

The high value for mercury at outfall 004 on 12/16/2003 appears to be an anomaly. It may have been a contaminated sample. All other samples were non-detect.