
From: LaSpina, Jim (ECY)
Sent: Friday, April 20, 2007 6:42 AM
To: Industrial Stormwater Comments
Subject: FW: Al's Truck Parts Industrial Stormwater Permit Comments

From: Al's Truck Parts [mailto:joel@alstruckparts.com]
Sent: Thursday, April 19, 2007 5:38 PM
To: LaSpina, Jim (ECY)
Subject: Proposed New Stormwater Permit

Jim La Spina
Department of Ecology
Olympia, WA

Dear Mr. La Spina

Please consider a couple comments concerning the proposed industrial stormwater general permit that's scheduled to take effect on September 20, 2007.

We believe the benchmarks and action levels for zinc and copper are unreasonably low. The result in our opinion will be many of those covered by the proposed permit will exceed these levels. In looking over the data included in the fact sheet for the proposed permit, most were above the benchmark level and many were above the action level. The proposed benchmark and action levels are unreasonably low compared to the benchmark and action levels of other substances. We would like to see the level for copper tripled and at those levels they would still be over 40% of the current permit.

The economic analysis shows the cost for the small business as a percent of sales were at least 5 times higher than for larger businesses in the same industry. We would hope that the department would revise the proposed permit and reduce the number of requirements on smaller firms to reduce the cost. The Department may want to consider providing some technical assistance to some of the smaller firms to help reduce some of the costs.

Sincerely,

Joel

Joel Larsen

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**** Monday - Friday 8:30 - 6:30 PST****