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Posted To: Industrial Stormwater Comments

Conversation: Comment on the Proposed Changes to the Industrial Stormwater General Permit

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Hexcel Corporation has the following comments on the proposed changes to the Department of Ecology Industrial Stormwater General Permit:

S2.C. Public Notice – Is the Public Notice required for each Application for Coverage, including renewal, or only for new or modified applications? Please clarify.

S2.E.2. Local Government Requirements – This is a new submittal requirement. Should a current Permittee be submitting only the copy of its latest Application for Renewal of Coverage (March 2007), the next one (March 2012) or all applications for coverage to-date (since 1992)? Please clarify.

S2. Mixing Zone – Are there still requirements on Mixing Zone under the current permit?

S3.A.3. Stormwater Management Manuals (SWMM) – Is the whole SWMM applicable? Or should the presumptive or demonstrative approaches suggested in S3.B.3. be referenced? Please clarify.

S3.A.4.e. Availability of SWPPP – Can Permittee withhold confidential or security information identified per S3.B. first paragraph? Please clarify.

S3.A.7. Other Pollution Control Plans – When other documents are referenced into the Stormwater Pollution Prevention Plan (SWPPP), please narrow the enforceable requirements to those applicable to this stormwater permit only.

S3.B.3. Best Management Practices (BMP) Does the Permittee have discretion to select which BMP from the SWMM is applicable as long as the objectives in S3.A.2. are met? Please clarify. (See also comment on S3.A.3.)

S3.B.4. Erosion and Sediment Control BMPs – Why is the title in italics? Should it be numbered S3.B.3.v.?

S3.B.5.d.i. Volume/Rate of Discharge – Does Ecology have any suggestion on how the Permittee could make such estimate? These are not static numbers and why are they important to document in the SWPPP? Please clarify.

S4.B. Sampling Requirements – With the change in sampling timing and frequency, how should current Permittees handle the reporting of any sampling in the third quarter of 2007 (July to September)? Typically the Qualified Storm Event comes in mid-September.

S4.B.2. Sample Locations – Does 2.d. supersede 2.b.? Please clarify. Does Ecology need to be notified if a sampling location changes?

S4.B.4.c. Laboratory Documentation – CAS number not applicable to all parameters.

S5.A.Table 2. The proposed Copper or Zinc Benchmark Values and Action Levels are lower than the current concentrations or the recommended concentrations in the 6415 Report. Is the proposal based on metal toxicity, water quality or industrial performance*? The 6415 Report revealed the significant percentage of Permittees unable to meet the current zinc level. Those same Permittees would be forced into Level 3 or 4 Corrective Actions immediately. A significant number of Permittees that had been compliant with Copper would also start exceeding Benchmark or Action Level under the new proposal. (* The 50th and 75th percentiles that the 6415 Report recommended is assuming all facilities within each industry group have the same characteristics, which is a questionable method of determination also.)

S5A.Table 2.Footnote d. pH indicator paper – Is the ± 0.5 SU requirement important when the sample is in Benchmark or Action Level ranges? Would rounding be prohibited? Please clarify.

S5.D.2.c. Conditionally Approved Non-stormwater Discharges, potable water – The potable water in water line flushing described in c. is the same water as in b. fire protection system or e. irrigation drainage. Why is de-chlorination necessary? And, if the discharge of potable water is not water line flushing, does it need to be de-chlorinated? Please clarify.

S7.A.1. Inspection Frequency – Please clarify if the visual inspections are for the whole site or only at sampling locations. Increase from one Wet Season Inspection to 9 monthly inspections is excessive, especially if a site consistently did not find any non-compliance. Can some reduced schedule be put in after 12 months of inspection compliance?

S7.B.1. Observation made at the time of sampling – Are the visual inspections follow-ups of observations made previously at sampling, or are visual inspections to be made at sampling time? Please clarify.

S8.B. Level Two Corrective Actions – Do current Permittees already at Level 2 starts counting exceedances over on September 30, 2007?

S8.B.4. Capital BMPs – Capital BMPs may take much longer than 6 months to complete. Suggest extending it to 12 months. Also, for current Permittees already at Level 2, would they have to revise their Response to include this new requirement (and other new requirements in S8.B)?

S8.C. Level 3 Corrective Actions – Please change December 2004 date to September 2007 to be consistent with S8.B. With the 2004 date and the proposed lower metal levels, probably 50% of current Permittees who are below Benchmark or at Level 1 or 2 would be immediately in Level 3. Also, please clarify the “action level” for the two samples exceeding action level is the current level or the proposed lower level. Also clarify if the Level Two Corrective Action was the current one or the proposed one.

S8. Corrective Actions – Are there any provision for offsite contribution, for example, street runoff onto a Permittee’s site or air disposition?

Thanks for the opportunity to comment. Looking forward to work with Ecology on these issues.

Regards,

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