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Posted To: Industrial Stormwater Comments
Conversation: Comments on Draft Industrial Stormwater General Permit
Subject: Comments on Draft Industrial Stormwater General Permit

Thank you for this opportunity to submit comments on the draft industrial stormwater general permit. As an environmental consultant actively assisting clients in implementing the permit, my comments are primarily focused on the procedural aspects of the permit.

1. S2.B 2 a (Page 12 of 118): Is it correct to assume that the SWPPP to be submitted to Ecology as part of permit renewal does not require the submittal of inspection reports, lab reports, calibration records, etc. that previous versions of the permit have stated are required to be entered into the Permittees SWPPP?
2. S3.B e ii 1 (Page 22 of 118): The reference to the Eastern Washington SWMM should be changed to "Chapter 8" instead of "Volume VIII."
3. S3.B 5 d (Page 23 of 118): This section requires the Permittee to discuss the method that will be used to estimate volume/rate of discharge and differences in exposure to pollutants. This requirement appears out of place because these analyses are not requested anywhere else in the permit. In addition, the request for information under i. and ii. is extremely vague and requires additional direction in order to provide meaningful results. Finally, it is not clear why this information is needed and how it will be used.
4. S7.D 1 (Page 40 of 118): Under Paragraph f, the permit requires that the person conducting the site inspection provide a statement declaring whether the site is either in compliance or out of compliance with the terms and conditions of the SWPPP and the permit. In many cases, the person conducting the site inspection is not in a position to make such a judgment, especially in cases where the Permittee has contracted with a consultant to conduct the quarterly inspection/monitoring. The current permit requires that quarterly visual monitoring reports be signed by the person making the observations (see S4.D 1 of the current permit) and that the report be reviewed and signed by a duly authorized representative of the facility, at which time the representative provides the above-described declaration as to compliance or noncompliance with the SWPPP and the permit. This current framework provides a more workable approach. Similarly, the certification requested under Paragraph h of this section should be provided by the duly authorized representative as well.
5. S7.D and E (Page 40 of 118): In S7.E, the reference to Condition S9.E should be changed to S9.D. Condition S9.D states that a Permittee must submit a noncompliance notification to Ecology if the Permittee is unable to comply with any of the terms and conditions of this permit *that could result in the discharge of pollutants in a significant amount...* The definitions section of the Permit defines *significant amount* as "an amount of a pollutant ... that has a reasonable potential to cause a violation of surface water...standards." Should similar criteria be used in deciding whether the facility is either in compliance or out of compliance with the terms and conditions of the SWPPP as part of the certification required in S7.D f? Or, is the certification in S7.D f more far-reaching to include minor oversights such as not documenting a BMP inspection or maintenance event?

Thank you for consideration of these comments.

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