



April 3, 2007

Industrial Stormwater Comments  
WA Department of Ecology  
Water Quality Program  
PO Box 47696  
Olympia, WA 98504-7696

Re: Comments on Draft NPDES Industrial Stormwater Permit

We appreciate both the work that Ecology has expended to draft the new Industrial NPDES permit and the difficult issues the department must address. As a current Permittee, we are concerned about two of the proposed conditions.

First, the application of the '1615 Study' results to the Permit's metals action limits is premature because Ecology knows that many if not most permittees will not be able to comply without capital investment. According to Ecology's Publication No. 06-03-00, "A Survey of Zinc Concentrations in Industrial Stormwater Runoff," dated January 2006, 93% of the 28 facilities studied exceeded the 109  $\mu\text{m}$  benchmark for zinc at least once during the six quarters of data, 68% exceeded the 218  $\mu\text{m}$  action limit at least once, and 32% exceeded the action limit at least twice.

Second, six months for the implementation of all capital BMPs necessary to reduce contaminant levels to below benchmark values is far shorter than the one- to five-year capital budget cycle of most Permittees and is shorter than the typical selection-design-build project cycle for such investments (defined as treatment, process modifications, containment/pumping systems, and new roofs).

Zinc comes from common galvanized roofing material, and to a lesser degree brakes, brake fluid, and tires. It is inevitable that many if not most Permittees will be forced to re-roof their facilities and or install treatment systems just to address sources of pollution that are ubiquitous in our society. A more effective and equitable approach would be leave these limits alone for now and regulate the use of galvanized products or promote the use of outdoor and automotive products that do not contain as much copper and zinc.

If you have any questions, please contact me at (360) 442-5210 or [josh.johnson@ci.longview.wa.us](mailto:josh.johnson@ci.longview.wa.us)

Sincerely,

Josh Johnson, PE  
Longview Stormwater Manager