



April 4, 2007

Mr. David Peeler  
Manager, Water Quality Program  
Industrial Stormwater General Permit  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

DEPARTMENT OF ECOLOGY

APR 12 2007  
WATER QUALITY PROGRAM

**RE: Proposed Permit Modifications for Industrial Stormwater General Permit**

Dear Mr. Peeler:

WaferTech is hereby submitting comments regarding proposed modifications to the Industrial Stormwater General Permit regulations for Draft issued February 21 through April 6, 2007:

1. The proposed benchmark and action levels (page 28) should remain unchanged from the existing permit. The alternative recommendation for establishing benchmarks based on permittee monitoring data does not seem reasonable, data may not be consistent throughout the State of Washington and may vary considerably from season to season. Benchmarks should be based on Clean Water Act/ Surface Water Requirements, not monitoring data.
2. The proposed corrective action process (page 41) should remain unchanged from the current permit. Permittees are familiar with the current corrective action requirements, changing the corrective actions from three to four levels further complicates the process and does not seem to add value to the corrective action process. The alternative recommendation to compare annual median seasonal monitoring data to the benchmarks and action levels does not seem reasonable due to the fact that monitoring data may not be consistent. Benchmarks should be based on Clean Water Act/ Surface Water Requirements not monitoring data.

Sincerely,

Judy Schramm, CHMM  
Environmental Engineer  
WaferTech L.L.C.