

January 9th 2008

Lionel Klikoff

Department of Ecology

PO Box 47600

Olympia, WA 98504-7600

DEPARTMENT OF ECOLOGY
JAN 10 2008
WATER QUALITY PROGRAM

Dear Mr. Klikoff:

We are a small vehicle recycling firm and we are very concerned about several elements of the new draft permit as that will affect small vehicle recyclers. The proposed permit will impose many new costs on small vehicle recycling firms.

We are asking the Department to make the following revisions to its proposed permit:

- Do recognize DOE document 94-146 "Vehicle Recyclers: A Guide for Implementing the Industrial Storm water General National Pollutant Elimination Discharge System (NPDES) Permit Requirements" as an acceptable manual on which to base BMP selection decisions by vehicle recyclers for this permit.
- Do not require additional sampling as compared to the existing permit sampling requirements.
- Do not lower the benchmarks for many of the metals because 50% of the firms will be in violation of these new limits.
- Provide an option for small firms that unfortunately trigger a Step B corrective action plan such as technical assistance through the Department to help small firms in lieu of requiring an engineering report.

We are a member of the automotive recyclers of Washington, and we endorse and support their verbal and written comments about this proposed permit.

Thank you,



WAYNE FOWLER
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