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Posted To: Industrial Stormwater Comments

Conversation: Comments on Industrial General Permit

Subject: Comments on Industrial General Permit

I have two comments on the most recent draft of the Industrial Stormwater General Permit document:

Page Numbering:

On my copy the page number is displayed on the top right or left of the page. Page 1 of 76, the Summary of Permit Reports, continues to page 2 of 76, followed by Special Conditions on page 3 of 76. Table 1 continues to the next page which is again labeled “2 of 76” followed by another “3 of 76”. This may not be how page numbers will be displayed on the final draft.

Recommendation to make UIC distinction more clear:

The requirement on the first page of Special Conditions (S1.A) states:

The Department of Ecology (Ecology) requires facilities that discharge to a surface water body or to a storm sewer system and that meet any of the four conditions below to obtain permit coverage.

This implies that anything discharging to our storm system would be a candidate for an Industrial Permit. In Vancouver, however, we have a significant number of storm drains in our system that discharge only to drywells (UIC wells). These drywells are often located very near to an industry but not on their property. The City has mapped the stormwater system and one of our water protection goals is to provide accurate guidance to businesses and industries on their permit obligations. The following provisions (in S1.E) suggest that if a facility’s stormwater enters our system and discharges only to ground then they need not obtain coverage:

Facilities that discharge only to ground water through an underground injection control well shall comply with any applicable requirements of the Underground Injection Control (UIC) regulations, Chapter 173-218 WAC.

For a facility that discharges only to ground, the facility need not obtain coverage under this permit, unless Ecology determines the facility may be a significant contributor of pollutants to waters of the state as defined in S1.B.

To make a clear distinction that UIC well discharges are handled differently this could be addressed in the S1.A provision in Special Conditions. For example:

*The Department of Ecology (Ecology) requires facilities that discharge to a surface water body or to a storm sewer system **which discharges to a surface water body** and that meet any of the four conditions below to obtain permit coverage.*

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