



Institute of  
Scrap Recycling  
Industries, Inc.

www.isri.org

January 10, 2008

Lionel Klikoff  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

**Re: Draft National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated with Industrial Activities**

Dear Mr. Klikoff:

The Institute of Scrap Recycling Industries, Inc. (ISRI) is pleased to submit the following comments in response to the Department of Ecology's request for comment on its draft National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated with Industrial Activities (henceforth, "Industrial Stormwater General Permit", or "ISWGP").

ISRI is the "Voice of the Recycling Industry." ISRI provides education, advocacy, and compliance training, and promotes public awareness of the value and importance of recycling to the production of the world's goods and services. With 21 chapters nationwide and headquarters in Washington, DC, ISRI represents more than 1,500 companies that process, broker, and consume scrap commodities, including metals, paper, plastics, glass, rubber, electronics, and textiles. ISRI's Pacific Northwest Chapter represents ISRI members in the State of Washington, as well as in the States of Alaska, Hawaii, and Oregon. ISRI provides education, advocacy, and compliance training, and promotes public awareness of the value and importance of recycling to the production of the world's goods and services. In 2006, the latest year with complete figures, the industry processed more than 150 million tons of scrap materials, conserving impressive amounts of energy and natural resources.

**DISCUSSION**

ISRI appreciates Ecology's efforts in reviewing its current and previous-draft permits in light of available stormwater data and with consideration to the phenomenological aspects of stormwater runoff and discharges (e.g., storm intensity, stormwater flow, and stormwater loading). ISRI believes that such a review provides support for ISRI's approach to management of stormwater discharges from scrap processing and recycling facilities.

ISRI concurs with Ecology's reasoning, as provided in the *Public Notice Fact Sheet*, for imposing neither technology-based nor water-quality-based numeric limits for most industrial permittees **and** for emphasizing implementation of best management practices (BMPs) to minimize stormwater-discharge loading. Consistent with the preceding, ISRI's approach to stormwater management consists of implementation, operation, continual maintenance, and periodic review, including any necessary corrective action, of operational source control BMPs (e.g., inbound-material acceptance/source control, personnel training, and good housekeeping), structural source control BMPs (e.g., containment, erosion control, and sediment traps), and/or treatment BMPs (e.g., oil/water separators and detention ponds). These BMPs can be used alone or in series, as appropriate, in a tiered approach to minimize the loading of stormwater discharges – first to prevent initial stormwater loading and, as necessary, to reduce any residual loading not prevented before the discharge of stormwater from the facility.

BMPs with presumptive approval and/or removal efficiencies, such as those provided in Ecology's stormwater management manuals, are essential in ISRI's approach and enable compliance by permittees without the need for benchmarks and sampling. Resources that would otherwise be spent on benchmark monitoring, which could trigger review that would happen anyway under a regimen of periodic BMP review, would be better applied towards operating, reviewing, and maintaining BMPs at peak performance, and if necessary based upon review, upgrading or implementing/installing BMPs.

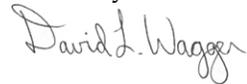
In agreement with ISRI's approach, "*Ecology determined that source control BMPs and treatment BMPs effectively protect water quality*" and further "*anticipates that the diligent implementation and maintenance of BMPs identified in the Permittee's SWPPP will result in stormwater discharges in compliance with the state's Surface Water Quality Standards*". It is notable that based on a review of recent stormwater data, "*Ecology determined that the system of benchmarks, sampling, and corrective actions (cumulatively considered adaptive management) mandated by ESSB 6415 appears to be reducing contaminant concentrations over time*". This observed reduction was likely due to BMPs that were implemented, operated, and maintained. By themselves, benchmarks and sampling do not reduce stormwater loading. Corrective actions involve BMPs, but periodic review of BMPs may also give rise to corrective actions. Properly functioning BMPs, which is the goal of ISRI's approach, require periodic review, which is part of ISRI's approach, regardless of the apparent need. Resources are best applied to keep BMPs functioning at their peak efficiency, not to perform benchmark sampling. In fact, in assessment of its BMP-based approach in the draft ISWGP, "*Ecology expects that [source control] BMPs will eliminate/minimize the potential contamination of stormwater*", "*... protect human health*", "*...comply with sediment management standards and ...protect ground water quality*". ISRI agrees.

**SUMMARY**

ISRI believes that Ecology's review of its current and previous-draft permits with due consideration to stormwater characteristics and data is helpful in making the case for a BMP-based approach to stormwater management. While the draft ISWGP does emphasize the implementation, operation, and maintenance of BMPs "to eliminate/minimize the potential contamination of stormwater", its inclusion of benchmarks and sampling means that there are fewer resources available for operation, continual maintenance, and periodic review, including any needed corrective action, of operational source control BMPs, structural source control BMPs, and/or treatment BMPs. These activities are essential for minimizing stormwater loading, and ISRI considers them to be more effective than benchmarks and sampling in managing stormwater to minimize the loading of stormwater discharges.

In closing, ISRI thanks Ecology for its consideration of these comments on its draft ISWGP. If there are any questions or comments, I can be reached at 202-662-8533 or [DavidWaggen@isri.org](mailto:DavidWaggen@isri.org).

Sincerely,



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