January 9, 2008

DEPARTMENT OF ECOLOGY
JAN 09 2008
WATER QUALITY PROGRAM

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

Dear Mr. Klikoff:

We are a small vehicle recycling firm and we are very concerned about several elements of the new draft permit as they 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 Stormwater 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 as 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 also.

Thank you,

Kevin Crowley
Walt & Vern's Inc.
25308 153rd St Ct E
Buckley WA 98321