

July 15, 2009

Mr. Jeff Killelea
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Re: Comments on Draft Industrial Stormwater General Permit

Dear Mr. Killelea:

Bell Lumber and Pole Company (BLP), Conway, appreciates the opportunity to comment on the Draft Industrial Stormwater General Permit. BLP operates a small, wood utility pole production yard. The primary operation involves peeling bark from poles, and the storage and air seasoning of untreated poles. No preservative treating occurs on this facility. On an on needed basis poles are periodically shipped from this yard to out-state facilities operated by BLP.

Our general comment is that the permit requirements are too restrictive and complex. BLP reviewed the comments by Kenndy/Jenks Consultants and concur with their comments that was submitted to the Department of Ecology, dated 10 July 2009.

SPECIFIC COMMENTS

- In addition to the benchmark requirements listed in Table 2, S5, BLP will be required to sample for BOD5, COD, and TSS. What specific reasons are there why turbidity needs to be sampled in addition to TSS? Is not TSS a better indicator of suspended solids than turbidity?
- Zinc is a ubiquitous metal in the environment. Allowance for background levels or non-industrial activity should be made; otherwise expensive structural BMP might be required to meet the benchmark with little actual benefit to water quality. Ecology should incorporate a background level into the benchmark to account for this, thus raising the current proposed value of 200 ppb for Western Washington. The benchmark should reflect only what an industry actually contributes to stormwater runoff.
- The same is true for turbidity as discussed above for Zinc.

- Benchmark language from the current permit should be retained.
- S6.C.1.b. Ecology should allow more time for an industry to determine its compliance to benchmarks once the new permit becomes effective. At least four quarters should be allowed to give time for sampling/analysis, and evaluation and implementation of applicable and appropriate BMP'S.
- S8.B.4.c., S8.C.4.c., and S8.D.1. Table 6. The time frames listed in these sections are too restrictive. In as much as there are many new requirements to meet in the proposed SWPPP, Ecology should allow more time for industry to adapt and comply.
- Small operations, such as BLP with very small stormwater discharges should be accorded less restrictive benchmarks. Small operations will find it very difficult, and possibly prohibitively expensive, to comply with the proposed SWPPP. We hope Ecology will keep this in mind as it moves toward reviewing and finalizing the SWPPP.

Respectively submitted,

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Signed Hard Copy to be Mailed