

Boeing Comments on Preliminary Draft ISWGP (June 3, 2009)

These are Boeing comments on the preliminary draft ISWGP. General concerns are:

- Benchmarks are lower than what is achievable with current technology.
- No clear mechanism for off-ramps (e.g., some of the requirements for Level 4 are not defined).
- No clear path for establishing site specific benchmarks that consider the receiving water body. It does not make sense for a permittee to attempt to reach a benchmark that has little relationship to the actual effect on the receiving waters.
- The permit is the same whether it is a large or small permittee. Ecology should consider a simpler shorter permit for smaller, lower risk permittees.

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
None/Page 5, Summary of Permit Reports and Submittals	<i>S2.A.4 Request Modification of Permit Coverage</i>	There is no S2.A.4. Do you mean S2.B?
None/Page 5, Summary of Permit Reports and Submittals	<i>S2.G Request Transfer of Coverage</i>	There is no S2.G. Do you mean S2.D?
None/Page 5, Summary of Permit Reports and Submittals	<i>S3.A.4.c SWPPP, if requested by Ecology</i>	There is no S3.A.4.c. Do you mean S9.E.1?
None/Page 5, Summary of Permit Reports and Submittals	<i>S9.E.1.c Noncompliance Notification</i>	There is no S9.E.1.c. Do you mean S9.D.1.c?
None/Page 5, Summary of Required Onsite Documentation	<i>S7.D Site Inspection Reports (with SWPPP)</i>	Do you mean S7.C?

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
S1/page 6, second paragraph, second sentence	<i>Facilities conducting industrial activities listed in Table 1 or S1.A2-5 shall apply for coverage under this permit or apply for a Condition No Exposure exemption, if eligible (Condition S1.F).</i>	"Condition" should be "Conditional."
S1.A.1, page 6	<i>Facilities engaged in any industrial activities in Table 1 shall apply for coverage if stormwater from the facility discharges to a surface water body, or to a storm sewer system that discharges to a surface water body. The Standard Industrial Classification (SIC) groups generally, but not always, associated with these activities are listed in Table 1.</i>	This paragraph is vague. Appendix #1, B in the existing permit is clearer and is consistent with not expanding the universe of facilities required to obtain coverage. A concise requirement is needed because this part of the permit is self implementing. As stated in the Fact Sheet, the significant Contributors Of Pollutants Condition in the draft permit allows Ecology to require coverage for facilities that would otherwise be exempt.
S3.A./page 13		The draft permit does not have the description of the presumptive approach in the current permit (S9.A.5). The presumptive approach is discussed in the Fact Sheet in the discussion on Condition S10.A but permittees are not required to read the Fact Sheet. Thus the presumptive approach must be incorporated into the permit language

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
		<p>In addition, the current permit has a condition “Existing facilities are not required to redo their SWPPP and BMPs to incorporate changes to BMPs that were designed and implemented according to an earlier version of the SWMM. “ Why is this excluded from the draft permit?</p> <p>S3 has as many as six levels (e.g., S3.B.3.b.i.3.b). This complexity negatively affects the clarity of the permit.</p>
S3.B.3.b/page 16	<p><i>No later than July 1, 2010, the Permittee shall include each of the following BMPs in the SWPPP and ensure that they are implemented unless site conditions render the BMP unnecessary or not possible, and the exception is clearly justified in the SWPPP.</i></p>	<p>There are other significant changes to SWPPP requirements. Boeing proposes that each new requirement have a specified date it must be incorporated into the SWPPP for existing facilities to prevent compliance risk from confusion over the compliance date. These deadline for existing facilities should be explicitly stated in S3.A.1 and added to the table on page 5.</p> <p>.</p>
S3.B.3.b.i.1/page 16	<p><i>The SWPPP shall include the Operational Source Control BMPs listed as “applicable” in Ecology’s SWMMs, or other guidance documents or manuals approved in accordance</i></p>	<p>Does Ecology mean by ‘applicable’ all BMPs listed in Section 2.1, Volume IV of the 2005 SWMM? If so, does this requirement extend to “recommended</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
	<i>with S3.A.3.c.</i>	additional” BMPs listed in this section?
S3.B.3.b.i.3.b/page 16	<i>All sources of dust shall be identified and prevented from accumulating on hard surfaces at the facility. Bag houses shall be inspected monthly and maintained to prevent the escape of dust from the system. Any accumulated dust at the base of exterior bag houses shall be removed immediately.</i>	“All sources of dust” is overly broad since dust may originate from off-site, and/or may be associated with a pervasive source like vehicles, wind blown soil, etc.. In addition, “prevented from accumulating” can be interpreted to mean that the dust source must be eliminated, or that no dust on hard surfaces is allowed which is not practical with a pervasive source. Propose that the first sentence be deleted.
S3.B.3.b.i.3.c/page 16	<i>All dumpsters shall be fitted with a lid that shall remain closed when not in use.</i>	Propose changing “with a lid” to “with a lid or placed under cover” since open dumpsters are sometimes placed under cover such as within a shed. or inside buildings. Also, WAC 173-304-200 already requires that reusable containers, except detachable containers, have a close fitting cover. Detachable containers are boxes that are designed to be loaded onto a specially equipped truck are required under to WAC 173-304-200 to have “either a solid cover or screen cover to

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
		<p>prevent littering.” These are typically large containers owned by and picked up when full by an outside vendor. These types of container often only have a screen lid. A permittee has limited control over the design of containers provided by an outside vendor. In addition, detachable containers are usually very large, and a solid lid would likely be very heavy and difficult to open and close. Will a screen lid meet this requirement? If so, a more robust approach is to revise WAC 173-304-200.</p>
S3.B.3.b.i.4/page 17	<p><i><u>Preventive Maintenance:</u> The SWPPP shall include BMPs to inspect and maintain the stormwater drainage, source controls, treatment systems (if any), and plant equipment and systems that could fail and result in contamination of stormwater. The SWPPP shall include the schedule/frequency for completing each maintenance task.</i></p>	<p>Boeing facilities use a computerized system to track maintenance activities. Is it acceptable to reference and describe this system in the SWPPP in lieu of listing the schedule/frequency in the SWPPP?</p> <p>S7.A.2 requires that “visual inspections” be conducted by a “Certified Industrial Stormwater Manager (CISM), Certified Professional in Stormwater Quality (CPSWQ), or Professional Engineer”. Is it Ecology’s intent to require a CISM, CPSWQ, or PE to do inspections required under preventive</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
		<p>maintenance? If not, this should be clarified in this section. For example, the permit maintenance and inspection as well as the schedule\frequency of each task could be under the direction of a CISM, CPSWQ, or PE.</p>
S3.B.3.b.i.4.b/page 17	<p><i>All equipment and vehicles shall be inspected for leaking fluids such as oil, antifreeze, etc., during monthly site inspections. Leaking equipment shall be taken out of service or prevented from leaking on the ground until repaired.</i></p>	<p>Monthly inspection of equipment with oil or antifreeze would be difficult for large facilities and unnecessary since equipment typically would not develop leaks within a month and are often stored indoors. One Boeing facility has over two thousand pieces of equipment on site. Should read "all exposed equipment. It is assumed that this condition is limited to company owned equipment that has significant outdoor exposure. This same Boeing facility has, on a typical work day, over 20,000 privately, vendor or customer owned vehicles parked on-site. Propose deleting the first sentence of this condition. And replacing the sentence with "Monthly site inspections shall include observations sufficient to identify leaking company owned vehicles that have significant outdoor exposure. A vehicle preventive maintenance plan</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
		with a leak control component may be substituted for this requirement.
S3.B.3.b.i.5.a/page 17	<i>All chemical liquids, fluids, and petroleum products, shall be stored on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater.</i>	<p>“Fluid” can be interpreted to include water such as potable or fire suppression water. Fire suppression water tanks do not typically have secondary containment. Is this Ecology’s intent? If not, the permit should clarify this point.</p> <p>There are many different regulatory requirements applicable to tanks depending on factors such as the material in the tank and the size of the facility where it is located. Secondary containment can be provided by different means. This requirement limits a permittee to using a berm or dike. For an existing tank, this will require a permittee to install a dike or berm around an oil tank that already has secondary containment because the surrounding area drains to an oil\water separator or containment structure.</p> <p>Many above ground tanks have integral dikes or a double wall. Mobile tanks are often stored in an area that has containment trenches that can be</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
		<p>“blind” or drain to an oil/water separator.</p> <p>Propose that this condition be changed to a performance criteria instead of the current prescriptive requirement. One option would be to use language similar to that used in the SPCC rule, i.e., “Construct all bulk storage tank installations (except mobile refuelers) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation.” [40 CFR 112 (7)(c)]</p>
S3.B.3.b.i.5.b/page 17	<p><i>Spill kits shall be located within 25 feet of all stationary fueling stations, fuel transfer stations, and mobile fueling units. At a minimum, spill kits shall include:</i></p> <ul style="list-style-type: none"> <i>i) Non-water absorbents capable of absorbing 15 gallons of fuel;</i> <i>ii) A storm drain plug or cover kit;</i> <i>iii) A non-water containment boom, a minimum of 10 feet in length with a 12 gallon absorbent capacity;</i> <i>iv) A non-metallic shovel; and</i> <i>v) Two five-gallon buckets with lids.</i> 	<p>This condition is very prescriptive and may be inadequate for certain situations such as transfers that occur at a high flow rate. A plastic shovel is unnecessary if pads are used instead of speedi-dry. It is unnecessary to cover or plug catch basins when the area drains to an oil/water separator. Two five gallon buckets are unnecessary if you have a drum. Propose changing this condition to “Spill kits shall be located within easy access of all stationary fueling stations, fuel transfer stations, and mobile</p>

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		fueling units. Spill kits shall contain adequate supplies to clean-up a spill that can reasonably be expected to occur.”
S3.B.3.b.i.5.d/page 17-18	<i>Storm drains that receive runoff from areas where fueling is conducted shall be blocked, plugged or covered during fueling.</i>	Propose changing this to “Storm drains within 25 feet that receive runoff from areas where fueling is conducted shall be plugged, covered or barricaded during fueling unless it drains to an oil\water separator.” This change is consistent with the mobile fueling BMP in the SWMM. At some Boeing facilities, customized barricades are temporarily installed on catch basins during fueling. These barricades have the advantage of being more durable than covers, and the fact that they can be checked to ensure that no spilled fuel is getting into storm drain which is not possible with catch basin covers.
S3.B.3.b.i.5.g/page 18	<i>Use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible. Drain fluids from equipment and vehicles prior to on-site storage or disposal.</i>	Propose deleting phrase “on-site storage or” from this condition, or changing it to “on-site long term storage” since “storage” is broad, and interpretation could vary from a few days to indefinite. Also, equipment and vehicles stored under cover and in containment should be exempted from this requirement.

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S3.B.3.b.iv.1 to 3/page 20	<p><i>Stormwater Peak Runoff Rate and Volume Control BMPs</i></p> <p>1) <i>For stormwater runoff from new facilities and facilities that have significant process change, the Permittee shall evaluate whether flow control is necessary to satisfy the state's AKART requirements, and comply with state water quality standards.</i></p> <p>2) <i>At a minimum, the SWPPP shall include a narrative that describes how the Permittee determined whether flow control BMPs are/are not required.</i></p> <p>3) <i>The SWPPP shall include appropriate flow control BMPs from Ecology's SWMM for Western Washington, the SWMM for Eastern Washington, or equivalent manual</i></p>	<p>This condition corresponds to S9. B.3.d in the current permit. Paragraph 1) applies to “new facilities and facilities that have significant process change” whereas the current permit applies to “new development and redevelopment. What was the basis of the change? Propose that “significant process change” in this context be limited to item 4 in the definition in Appendix 2. That is, this requirement should be limited to increases in impervious surface of greater than 25%, or the condition be revised to the original language in the current permit.</p> <p>3) is confusing as it appears to require all facilities to have flow control BMP's while paragraph 1) indicates this is a requirement only for new facilities or with significant process change.</p>
S3.B.3.b.iv.4/page 20	<p><i>Permittees choosing not to use approved SWMMs or other Ecology-approved technical guidance documents to meet this requirement shall include the technical basis for their chosen BMPs as described in the introductory paragraphs of Condition S3 and required in Condition S3.B.3.d.</i></p>	<p>There are no introductory paragraphs in S3 and there is no S3.B.3.d. Propose adding the introductory paragraphs of S9 in the current permit to S3 of this permit. See also comment on S3.A above.</p>
S3.B.4.b/page 20	<p><i>The permittee shall implement and maintain filtration BMPs to remove solids from catch basins, sumps or other</i></p>	<p>This condition seems to require that all “catch basins, sumps or other</p>

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	<i>stormwater collection and conveyance system components (filter socks, modular canisters, sand filtration, centrifugal separators, etc.).</i>	stormwater collection and conveyance system components” have some type of sediment control such as filter socks or is Ecology’s intent that a BMP be in place to clean these devices.
S3.B.5.a/page 20	<i>Identify points of discharge to surface water, storm sewers, or discrete ground water infiltration locations, such as dry wells or detention ponds.</i>	<p>The current permit states in S9.B.2 that “The plan must identify all points of discharge to surface water or to a storm drain system.” This condition has been expanded to “discrete ground water infiltration locations, such as dry wells or detention ponds.” This implies that discharges to ground should be sampled. The Fact Sheet (page 60) clarifies this with the statement <i>“However, this does not mean that discharges to ground are subject to stormwater sampling and monitoring.”</i></p> <p>We understand Ecology’s goal of simplifying the permit. However, many permittees do not read the Fact Sheet so it would clarify the permit to include the language from the Fact Sheet or revert back to the language in the current permit. S10.A, S1.E, and S1.B should address Ecology’s concern regarding protecting groundwater.</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
S4/page 21	<i>SAMPLING</i>	<p>The elimination of the qualified storm event criteria will help ensure that a permittee will be able to collect samples even with the weather patterns typical of Western Washington.</p> <p>Boeing supports the use of a mean or median of at least one season of data in order to get a better idea of the stormwater quality.</p>
S4.B.2.c/page 22	<i>The Permittee shall sample each distinct point of discharge off-site and shall analyze each sample separately; except where pollutant types, at one or more distinct point of discharge off-site, do not vary (based on industrial activities and site conditions), the Permittee may sample only the discharge point with the highest concentration of pollutants.</i>	Permittee should be allowed to estimate the flow for each discharge sampled to provide engineering data in support of their storm water management effort. This data should not be required on the DMR as it is only an estimate and not a measurement.
S4.B.5/page 23	<i>The Permittee shall maintain the original records onsite and make them available to Ecology upon request.</i>	Some records such as quality assurance/quality control data, MDLs and person who performed the analysis may be kept at the analytical lab which may not be on-site. Propose changing this requirement to "The Permittee shall maintain the original records onsite or, when outside vendors are involved be readily retrievable, and make them available

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		to Ecology upon request.
S4.B.6/page 23	<i>After the effective date of this permit, the Permittee may suspend sampling for one or more parameters based on consistent attainment of benchmark values when:</i>	<p>How does a permittee determine consistent attainment when more than one sample is collected in a same quarter? Is the average used? Also, is the average or all the discrete sample results, or both reported? We propose using an arithmetic average because we believe it is more representative of water quality. Similarly, see comment regarding S4 above.</p> <p>Propose changing this condition to “After the effective date of this permit, the Permittee may suspend sampling for one or more parameters at one or more sampling locations based on consistent attainment of benchmark values when:” A facility may have several sampling locations receiving stormwater from areas with very different processes.</p>
S4.B.6.a/page 23	<i>Eight consecutive samples in which the reported value for the listed parameter, other than pH, is equal to or less than the benchmark value.</i>	Propose changing “Eight consecutive samples” to “Eight consecutive quarterly samples.” Is the “reported value” the highest or average of all samples taken in a quarter?

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
S4.B.6.b/page 23	<i>For pH, the eight consecutive samples shall be within the range of 6.5 to 8.5 (freshwater) or 7.0 to 8.5 (marine).</i>	<p>Propose changing “Eight consecutive samples” to “Eight consecutive quarterly samples.”</p> <p>Why is this range different than the range in Table 2. Why does table 3 not have a benchmark range for marine water?</p>
S4.B.6.c/page 23	<i>For discharges to 303(d)-listed water bodies, eight consecutive samples fail to detect the presence of the listed parameter.</i>	<p>Propose changing “Eight consecutive samples” to “Eight consecutive quarterly samples.”</p> <p>The phrase “fail to detect the presence” is vague because it may be misleading because of high detection limits. Propose changing this phrase to “fail to exceed the water quality standard for the listed parameter.”</p>
S5.A.2/page 24	<i>If the Permittee's discharge exceeds a benchmark, the Permittee shall take the actions specified in Condition S8.</i>	<p>If a permittee takes more than one sample in a quarter, is each discrete result or the average used to determine if a discharge exceeds a benchmark? We believe it should be the arithmetic average because it is more representative of the water quality discharging from a facility. This use of a seasonal arithmetic average is the approach in 6.2.1.2 (page 36) of</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
		<p>the MSGP.</p> <p>There is a legitimate concern that a facility with high levels of stormwater pollutants will wait a year before any corrective action. We believe that the approach in the MSGP (page 36, last paragraph) addresses this concern. That is, action is required when an exceedance of the four quarter average is mathematically certain.</p>
S5.A.2 Table 2/page 24 and S5.B.2 Table 3/page 25	<i>Analytical Method</i>	The Laboratory Quantitation Levels in the tables are in some cases 1 to 2 orders of magnitude lower than the benchmarks. We do not understand the basis for this large difference. It will result in unnecessary analytical costs, and the purchase of additional equipment.
S5.A.2 Table 2/page 24	<i>Turbidity</i>	TSS should be allowed as a substitute for turbidity to account for samples with color but low suspended solids. Ecology should allow a facility to obtain a waiver under S8 when color and not suspended solids is causing high turbidity

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
S5.A.2 Table 2/page 24	<i>pH</i>	Rainfall has been shown to often be below 6. How will Ecology account for sample pH being less than 6 because rainfall is less 6? Does Ecology anticipate that a facility goes into Corrective Action under S8 because of low pH rainfall will be successful in getting a waiver?
S5.A.2 Table 3/page 25	<i>Additional Benchmarks and Sampling Requirements Applicable to Specific Industries</i>	<p>Based on an e-mail from Ecology, it appears that Ecology intends that this table apply to a facility's primary activity. Is this correct? If so, we propose that the table's title be changed to <i>Additional Benchmarks and Sampling Requirements Applicable to Specific Industries based on Primary Activity.</i>"</p> <p>Metals Fabricating (34XX) is very different than the other three groups listed under category 2 [i.e., Primary Metals (33XX), Metals Mining (10XX) , Automobile Salvage and Scrap Recycling (5015 and 5093)]. Metals fabricating often have all their manufacturing activities under cover primarily because of the value of the finished products and the necessary quality assurance in the manufacturing process. However, storage and</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
		<p>transportation would exclude non-exposure option. The other three industry groups are often required to do their activities outside because of economics and the size of the material that they typically handle. We propose that 34XX be removed from Category 2 unless it can be shown by looking at solely 34XX site monitoring data that this additional monitoring is warranted when compared to other non-listed SICs.</p>
S5.A.2 Table 3/page 25	<p><i>Additional Benchmarks and Sampling Requirements Applicable to Specific Industries</i></p>	<p>The TSS benchmark for category 3 is 100 mg/L whereas it is 30 mg/L for category 5. Is this an error? The value listed in the MSGP is 100 mg/L.</p>
S5.A.2 table 3 Footnote e/page 26	<p><i>For airports where a single permittee, or a combination of permitted facilities use more than 100,000 gallons of glycol-based deicing chemicals and/or 100 tons or more of urea on an average annual basis, monitor these additional four parameters in those outfalls that collect runoff from areas where deicing activities occur (SIC 4512-4581).</i></p>	<p>The table lists two and not four additional parameters.</p> <p>Airports may discharge airplane deicing/anti-icing fluid to the sanitary sewer and not to the surface water.</p> <p>For an airport with several permittees, which permittee will be responsible for compiling usage data, and determining if samples should analyzed for the additional parameters?</p>

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		<p>We propose adding language to this footnote as follows;</p> <p><i>For airports where a single permittee, or a combination of permitted facilities use more than 100,000 gallons of glycol-based deicing chemicals and/or 100 tons or more of urea on an average annual basis <u>that is discharged to surface water or stormwater system</u>, monitor these additional four parameters in those outfalls that collect runoff from areas where deicing activities occur (SIC 4512-4581).</i></p>
S7.A/page 32	<p><u><i>Inspection Frequency</i></u></p> <ol style="list-style-type: none"> <i>1. The Permittee shall conduct and document in the SWPPP visual inspections of the site each month.</i> <i>2. Beginning January 1, 2012, visual inspections shall be conducted by a Certified Industrial Stormwater Manager (CISM), Certified Professional in Stormwater Quality (CPSWQ), or Professional Engineer.</i> 	<p>A monthly inspection of a facility may be too frequent for some parts of a facility and too infrequent for other parts of a facility. SWPPP inspection frequency should be based on the risk of a release of pollutants to surface water.</p> <p>For example, does Ecology expect a permittee to look at each catch basin each month? Some Boeing facilities have over a thousand catch basins. Similarly, would it be acceptable to</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
		<p>only look at a problem piece of equipment like a trash compactor monthly. Suggest revising 1. to reflect that the permittee will conduct quarterly inspections except that it shall be monthly for aspects of the facility that pose a significant risk of pollutant release. These shall be documented in the SWPPP. Ecology may want to create a list of conditions warranting monthly inspections.</p> <p>Propose changing 2. to “Beginning January 1, 2012, visual inspections shall be conducted by, or under the direction of, a Certified Industrial Stormwater Manager (CISM), Certified Professional in Stormwater Quality (CPSWQ), or Professional Engineer.” This would allow craftspeople like mechanics or plumbers to do some aspects of inspection using detailed instructions developed by a person qualified under this section.</p>
S7.B.3/page32	<i>Observations for the presence of illicit discharges such as domestic wastewater, noncontact cooling water, or process</i>	Typically, this type of inspection has been part of a dry season inspection. There are no criteria in this permit such

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
	<i>wastewater (including leachate).</i>	as “7 days without measurable rainfall.” Is this Ecology’s intent? Also, this type of inspection may be difficult or impossible during the wetter months when rainfall or base flow will obscure any illicit discharge.
S8/page 34	<i>Corrective Action</i>	<p>The crosswalks from the current permit to this permit is a very difficult problem. We proposed that a Level 2 or Level 3 permittee be required to continue its obligation under the current permit and not be subject to the crosswalk requirements under the new permit. Of course, in some cases, a permittee may have had an inadequate or no response. This is not a problem with the current permit. It is an issue of enforcement.</p> <p>We propose that an existing permittee under Level 2 or Level 3 as described above would be required to monitor and perform corrective actions in the same manner as a permittee not under corrective action in the existing permit. In the meantime, the permittee would complete the work described in their Level 2 or 3 reports. That is, the cross</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
		<p>walks in S8 and the appendix would be eliminated.</p> <p>Is it Ecology's intent for a permittee to do a Level 1 to 4 Corrective Action for all parameters at all outfalls if one parameter at a single outfall exceeds the benchmark? If so, this concept should explicitly stated in the beginning of this section.</p>
S8.B/page 34	<p><i>The following facilities shall complete a Level 2 Corrective Action in accordance with S8.B.1-4:</i></p> <ul style="list-style-type: none"> • <i>Facilities not listed in Appendix 6 that exceed any benchmark value [in tables (2-6)] during any 4 separate quarterly monitoring periods after January 1, 2010; and</i> • <i>Facilities listed in Appendix 6 (Level 2).</i> 	<p>A facility in Level 2 Response under the current permit may be required (in accordance with Table 3) to sample for parameters not previously sampled for. The permittee would not have the opportunity to address this parameter under Level 1 response.</p> <p>In addition, it is possible that a facility may have installed structural or treatment (under corrective action under the current permit) that was designed to meet an action level that would be replaced by a much lower benchmark under this permit.</p>
S8.D.1.a/page 36	<p><i>Issue an administrative order, requiring the permittee to:</i></p> <p><i>i. Submit a receiving water study;</i></p>	<p>Ecology should also define what is required of a "receiving water study". The requirements in WAC 173-240-</p>

Permit Section/Page	Subject/Comment (permit language in italics)	Question/Issue/Solution
	<i>ii. Submit an engineering report in accordance with WAC 173-240-130;</i>	130 are primarily directed to a permittee designing a wastewater treatment plant with a well characterized influent and established treatment technology. Ecology should develop a new standard for stormwater treatment.
S8, Table 8/page 37	<i>Corrective Action Table</i>	Level 2, 3 and 4 corrective action may not be achievable in the time required. The permit should be revised to include a process for an extension of schedule under Level 2, 3 and 4. We presume that this would need to comply with public notice requirements. Anticipated reasons that the time limits cannot be met may include complexity of design, other required permits, access to off-site property, and the fact that many stormwater system improvements must be done in dry weather.
G8/page 44	<i>Duty to Reapply The Permittee shall apply for permit renewal at least days prior to the expiration date of this permit.</i>	The number of days is missing. We believe this should be 180 days.
Appendix 4	Existing Dischargers to Impaired Water Bodies	The Boeing facilities listed do not discharge to the impaired locations

Permit Section/Page	Subject/Comment (permit language in italics)						Question/Issue/Solution
	Permit_ID	Name	County	Waterbody	Location	Parameter	listed.
SO3000146D	BOEING A&M DEVELOPMENTAL CENTER	KING	DUWAMISH WATERWAY	47122F3C0	pH		
SO3000232D	BOEING COMPANY RENTON PLANT	KING	CEDAR RIVER	20.667	pH		
SO3000482D	BOEING PLANT 2	KING	DUWAMISH WATERWAY	47122F3C0	pH		
SO3001009D	BOEING SOUTH PARK	KING	DUWAMISH WATERWAY	47122F3C0	pH		
SO3000148D	BOEING THOMPSON SITE	KING	DUWAMISH WATERWAY	47122F3C0	pH		
Appendix 6,	Facility: <i>THE BOEING CO</i> Permit: <i>SO3000481D</i>						Facility name should be "BOEING SPACE CENTER". This name will be consistent with other Ecology lists.