

July 10, 2009

To: Jeff Killelea
Department of Ecology
P. O. Box 47600
Olympia, WA 98504-7600

Re: Comments on Draft Industrial Stormwater Permit

Jeff,

I understand the need/requirement for the updates to the permit and some of the forces /factions involved. My comments are directed to Section S5. For permittees who sample at the outfall of a wetland or vegetatively lined ditch/drainage conveyance;

1. weighty consideration should be given to background levels of naturally occurring substances and biomatter. Specifically, algae blooms, flushing of vegetative decaying matter such as grasses and weeds. Additionally background levels of elements such as Copper need some leeway. I would support the 25NTU level for Turbidity if it is above an established background level of 15NTU. I would also suggest a background level of 7ug/L for Copper.
2. chemical oxygen demand is a measure of the capacity of water to consume oxygen during decomposition. Again background levels need consideration and leeway.
3. Department of Ecology's Citizens Guide to Understanding and Monitoring Lakes and Streams: Chapter 3 – Streams; total suspended solids and turbidity, recognizes the presence of mineral and organic particles naturally vary due to seasonal changes.

I do hope you will weigh these comments in the drafting of the final permit.

Thank you,

Steve Fogg
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