From: RHoover@cob.org
Date: Tuesday, July 14, 2009 2:36:09 PM
Posted At: Industrial Stormwater Comments
Conversation: Comments on the draft Industrial Stormwater General Permit
Subject: Comments on the draft Industrial Stormwater General Permit
Attachments: ATT02690.jpg

Dear Mr. Killelea,

The City of Bellingham appreciates the opportunity to comment on the revised general Industrial Stormwater Permit. We feel the current revision will be protective of the state's water resources and that the code reflects compliance requirements that can be accomplished with our current staff resources. We have two points of concern that are detailed below:

Comment 1:

Section S8. B - D.

Section S8.B (pg 34) states:

"The following facilities shall complete a Level 2 Corrective Action in accordance with Condition S8.B.1-4:
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"

It is not logical to trigger corrective action level based on 4 exceedences of any of the analyzed parameters. This strategy does not adequately characterize a problem at the industrial facility, nor does it provide appropriate basis for determining/implementing appropriate BMPs. Instead, it will likely only serve to push long-standing in-compliance facilities (like the City of Bellingham Waste Water Treatment Facility) into higher action levels based on nonrepresentative one-time exceedences. We suggest action level placement be determined by multiple exceedences of the same water quality parameter.

Comment 2:

Section S8 & Appendix 6.

Appendix 6 of the draft code mandates carryover of corrective action level 2 for all permittees that have triggered corrective action levels 2 or 3 during the previous permit cycle. While this action ensures that out-of-compliance facilities

continue to take steps towards improving water quality, it is a punitive approach to take towards permittees that have strived to take appropriate action, often at significant capital expense, and have achieved compliance. We suggest a return to an "in compliance" designation upon proof of successful corrective action and/or the right to petition for reclassification to a lower action level.

Sincerely,

Richard Hoover
Water Quality Specialist
Green Government Team | City of Bellingham
PHN: 360.778.7874 | FAX: 360.778.7851
EML: rhoover@cob.org