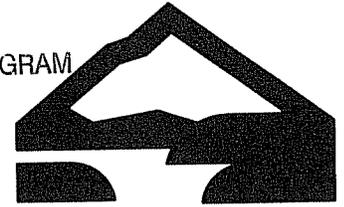


JUL 20 2009

WATER QUALITY PROGRAM



Columbia Vista

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July 13, 2009

Jeff Killelea
Department of Ecology
PO Box 47600 Olympia, WA
98504-7600

Dear Mr. Killelea:

The Columbia Vista Corporation located in Vancouver, WA. appreciates the opportunity to comment on the Draft Industrial Stormwater General Permit. As a business in the lumber manufacturing industry that will be covered by this permit we have the following concerns

- This permit is 71 pages long (with a 19 page Fact Sheet) and has 58 requirements in it for me to comply with. As a small business, we do not have the staff to determine the details, so either we hire lawyers or other consultants to help with our understanding of the new compliance regulations. In this economy, the cost will be prohibitive. Additionally, the costs of complying could be catastrophic to us.
- This permit has extensive requirements to identify and install best management practices from the Stormwater technical manual to achieve all known and Reasonable Treatment Technology (AKART). In order to determine what this means specifically, we will once again have to hire lawyers and consultants as well as rely on consultation from Ecology. With our current containment, stormwater discharge systems and BMP's, we currently exceed the requirements. Yet we may have to create new or more

processes? This could limit our ability to run a successful business in a difficult industry and time.

- This permit changes the action levels at which I must increase my storm water management response. The new levels are so strict that based on industry norms it is probable that we will need to install extensive new treatment systems. Over the years, we have invested over \$1 million to capture and control stormwater runoff. Yet we may be forced to invest significantly more to meet these unreasonable objectives. We have BMP's in place and monitor rigorously as it stands today. These changes could lead to insurmountable costs in the monitoring. Recent government studies concluded that surface water runoff and municipal wastewater treatment plants (not industry) were by far the most significant contributors to toxics loading. Yet industrial stormwater permittees will be required to comply with the most restrictive stormwater permits in Washington and the country, while municipalities and the Washington Department of Transportation do not have to take actions required of industry based on monitoring data.

Thank you for considering our comments. If you have any questions, please contact me directly.



Robert B. Lewis

COO/Owner

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