**From:** Boyd Dines
**Date:** Tuesday, July 14, 2009 4:45:34 PM
**Posted At:** Industrial Stormwater Comments
**Conversation:** Draft Washington State Industrial Storm Water Permit
**Subject:** Draft Washington State Industrial Storm Water Permit

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Dear Mr. Killelea,

Compass Aerospace Northwest, located in Kent, Washington appreciates the opportunity to comment on the Draft Industrial Stormwater General Permit. As a business in the aerospace industry that will be covered by this permit we have the following concerns:

- This permit is 71 pages long (with a119 page Fact Sheet) and has 58 requirements in it for us to comply with. Our ability to administer this permit will take additional resources that are not currently budgeted. We would most likely have to hire a consultant to ensure we are in compliance. We are in a very competitive business where these costs are not easily recouped.

- 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). We at Compass currently do not know if we can afford to install or have the space to ensure best practices for future requirements. Again we would be forced to hire consultants.

- 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 I will need to install extensive new treatment systems. Based on the current outline of costs per acre we

would be spending over a $1,000,000 to achieve the type of system that hopefully meets the new levels. This would potentially put us out of business or force the need for our business to go elsewhere to operate. Again we would have to hire a consultant for this as well.

Thank you for considering our comments. If you have any questions, please contact the undersigned.

Thank you,

Boyd Dines

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