From: Keith, Don
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Posted At: Industrial Stormwater Comments
Conversation: Comments on June 3, 2009 Draft ISWGP
Subject: Comments on June 3, 2009 Draft ISWGP

S2.C Permit coverage or Permit Modification

What is the timeline Ecology must follow to notify an applicant that it regards the application is incomplete or more information is required? Could an applicant proceed based on the timelines in 1 before 2 and/or 3 have been executed by Ecology?

S3.A General Requirements

Does compliance with the specific requirements in S3.B meet the general requirements in S3.A?

S3.A.6

Does the G2 signatory requirement apply to all inspection reports or specifically the inspection in S7? A facility might require a daily inspection of the facility or parts of the facility as a BMP, having a corporate officer or designee sign these every day would impose a needless burden on the facility. Inspections conducted under these circumstances should require only the signature of the inspector.

S4.B

We appreciate the simplification of event criteria for sampling.

S5.B.2

The copper benchmark seems unattainable at a reasonable cost; we suggest retaining the copper benchmark of 63.6 ug/L in the current permit.

S7.A.2

The requirement of certifying inspectors adds cost to implementing the permit without adding any obvious value. The qualification of inspectors seems to us to require site specific knowledge of the facility processes, layout, potential pollutant sources, and BMPs, as well as how these interact with each other. The training and knowledge is site specific. We believe this requirement should be deleted.

S8 Corrective Actions

Does the phrase “exceed any benchmark value for any 4 separate quarterly

monitoring periods” mean exceed the benchmark four times for a specific parameter or does it mean that exceeding turbidity in two quarters and exceeding phosphate in two other quarters triggers the action level? The fact sheet indicates the former but the permit seems ambiguous to me.

G8.

No days have been specified for permit reapplication.

Thank you for the opportunity to comment on this draft permit.

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