From: Jim Blais
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Posted At: Industrial Stormwater Comments
Conversation: industrial stormwater permit comments
Subject: industrial stormwater permit comments

I have a couple of comments detailed below about the new Industrial Stormwater General Permit. Before the comments I would like to say that overall ecology did a great job re-writing this. Below are my comments.

In S1 Table 1, SIC codes should not be used as they are being replaced.

S3 A2 b & c should fall within A3 a & b and thus are not needed.

S3 B3 under Operational Source Control BMPs section 3 "Good housekeeping" should be eliminated. These are case by case BMPs and should be listed as such and not required. Requiring each site to have a vacuum sweeper and dumpsters to have lids is outrageous. The cost of a sweeper is unreasonable for most sites and most large bin containers can not be fitted with lids.

S3 B5 b Spill Kits New requirements including booms and requiring storm drains to be plugged are unnecessary especially if facilities have treatment BMPs such as oil water separators etc in place.

S3 B5 g change to make more stringent, only requiring drip pans under leaky vehicles is a weak requirement.

S5 A2 Zinc levels are way too low for Western Washington especially when you do not have an ample plan to reduce zinc airborne emissions.

Thank you and good luck finishing the permit,

Jimmy Blais

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