July 15, 2009

TRANSMITTAL VIA ELECTRONIC MAIL AND REGULAR MAIL

Mr. Jeff Killelea
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Comments on DOE's Draft Industrial Stormwater General Permit

Dear Mr. Killelea:

Hecla Limited appreciates the opportunity to comment on the draft industrial stormwater general permit. Our comments are centered on inactive and unstaffed sites and we would like to offer the following comments for your consideration:

1. The 11/21/07 draft of this permit had a clear exception to sampling for inactive and unstaffed sites (condition S4.C. in the 11/21/07 draft permit). This exception no longer appears in the current draft permit and we are uncertain if there was an oversight and this exception was inadvertently left out of the current draft permit or if DOE is now handling this issue through the definition of "normal business hours". We could not find any discussion in the Fact Sheet about dropping this exception, thus we believe it still exists in some form or was inadvertently left out. Such an exception is appropriate and we would appreciate DOE clarifying this issue.

2. It also appears that monthly inspections are required for inactive and unstaffed sites. Monthly inspections do not seem necessary for inactive and unstaffed sites and were not required by the expired permit. EPA's current general permit only requires an annual compliance evaluation for inactive and unstaffed sites. We would appreciate DOE considering a similar frequency for inactive and unstaffed sites.

3. A new requirement is found at draft permit condition S7.A.2. for inspections. A Certified Industrial Stormwater Manager, Certified Professional in Stormwater Quality, or

Professional Engineer must conduct visual inspections. We request that DOE consider and exception from such a requirement for inactive and unstaffed sites.

Thank you for your consideration of our comments.

Best Regards,

Dave Holland
Project Manager

C: Paul Glader