From: Bruce DeJong
Date: Wednesday, July 15, 2009 4:10:46 PM
Posted At: Industrial Stormwater Comments
Conversation: Washington State Industrial Storm Water Permit Draft
Subject: Washington State Industrial Storm Water Permit Draft

---

Dear Mr. Killelea,

As a business covered by the proposed storm water permit, Milne Fruit Products, of Prosser, appreciates the opportunity to comment on the proposed permit. We do have several concerns with the new proposed permit.

The most noticeable issue is the lowering of the action level limits. With the existing levels, our plant has exceeded the action levels occasionally and has performed the action level response to remedy the occurrences. The proposed lower limits will make the solutions that much more difficult and costly to implement. Our area is very dry and windy. With so few rain events, dust and debris accumulates around the facility, especially the roofs. With the annual precipitation of 7" to 10", many of the levels are going to be very difficult to comply with due to the timing between rain events.

This permit is very long and has many, over 50, requirements for this plant to comply with. This plant is very lean in manpower. To make sure we comply with all the requirements, we have all the "Best Management Practices" implemented, and to able to achieve the "All Known and Reasonable Treatment Technologies," the plant will require a consultant or an additional person on staff. This is a huge expense for a plant that just had a 5 week shutdown and layoff due to the current global economic environment.

If the facility has to install a new treatment system to meet the new requirement levels, it will cause a significant financial burden. I believe our current economic situation may not support that kind of capital expenditure, let alone the additional management support required for such a system. Will the State of Washington be able to help facilities install and finance such a treatment system? Or help with the design of a system?

Thank you for considering our comments. If you have any questions or concerns, please feel free to contact me.

Sincerely,

Bruce DeJong

Plant Engineer
Milne Fruit Products, Inc.
bdejong@milnefruit.com
509-786-2611

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication is confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call immediately and ask to speak to the sender of the communication. Also, please notify immediately via e-mail the sender that you have received the communication in error.