From: Jody Snyder
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Posted At: Industrial Stormwater Comments
Conversation: Comments regarding the draft Industrial NPDES permit
Subject: Comments regarding the draft Industrial NPDES permit

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Jeff

Pierce County Recycling, Composting and Disposal, LLC dba LRI has taken the opportunity to review the draft Industrial Stormwater General Permit. We own and operate numerous facilities in Western Washington related to the collection, transfer, recycling, composting and disposal of solid waste, including the LRI Landfill located outside Graham, Washington. We respectfully submit the following comments for your consideration.

1. Municipal solid waste (MSW) landfills are subject to the requirements of both Construction and Industrial NPDES Permits. In order to meet the requirements of the Solid Waste Handling Permit and operate in an efficient manner, MSW landfills are required to have ongoing construction projects to build out and subsequently close portions of the facility. These projects involve the excavation, movement, and placement of large volumes of soil, often exceeding 100,000 cubic yards for each project. Given the scope of ongoing construction required to develop and close the landfill, it does not appear reasonable that the Permittee should be held to a 25 NTU benchmark/trigger level (Section S5 Table 2) while a similar adjacent construction project, such as a commercial development project, would be held to an Action Level of 250 NTU. Ongoing construction activities at the landfill will certainly tend to have the highest potential to cause turbidity. It does not appear reasonable to implement corrective actions (Section S8 B & C), particularly storm water treatment (Level 3), based on turbidity alone for such an industrial site. Instead, we believe corrective actions should also be tied to the exceedances of effluent limitations applicable to non-hazardous landfills (Section S5 C Table 4.).
2. It Section S9 of the draft Industrial Permit, it is not clear which data are required to be included on the Discharge Monitoring Report (DMR) for a facility that is subject to both a Construction NPDES Permit and an Industrial NPDES Permit. Under the Construction Permit the site will be inspected and monitored for turbidity on a weekly basis. However, under the Industrial Permit the site is only

required to be monitored for turbidity on a quarterly basis. It appears that the Permittee could select any one of the turbidity results to include on the Industrial DMR as long as the sample was representative and collected during the quarter. Clarification of the data that should be reported when more than one monitoring event is conducted would be useful.

If you should have any questions regarding these comments please do not hesitate to contact me either by email or at (253) 927-6810.

Sincerely,

Jody L Snyder
Director of Regulatory Services