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Subject: Draft Washington State Industrial Storm Water Permit

To whom it may concern,

Precision Iron Works in Pacific, WA appreciates the opportunity to comment on the Draft Industrial Stormwater General Permit. As a business in the Structural Steel industry that will be covered by this permit we have the following concerns:

- This permit is 71 pages long with a 119 pages of Fact Sheet and has 58 requirements in it for me to comply with. This is extremely troublesome and concerning to us because we are going to have to hire a consultant to come into our business and evaluate how we are going to attain these impossible new benchmarks that you have set. We are struggling to attain the current strict benchmarks. This means not only more money out of our pockets as a small business, but may mean job loss to pay for the consultant. We are also seriously considering if we need a lawyer to understand and comply with this new permit. We are very worried that this new permit could mean job loss for our company, and at worst, our company sustaining losses that we will be unable to recoup.
- The permit has extensive requirements to identify and install best management practices from the Stormwater technical manual to achieve All Known and Reasonable Treatment Technology (AKART). To be honest we just don't have the capital to implement all the best management practices that it calls for in the manual. This put us in a very difficult situation of paying to keep the business going or pay for the best management practices and hope that we have enough capital left over to keep our business running.
- This permit changes the action levels at which I must increase my stormwater management response. The new levels are so strict that based on industry norms it is probable that we will need to install an extensive new treatment system. That simply is not affordable. The new levels will defiantly cripple our company and most likely will hamper our ability to do work in Washington.

Thank you for considering our comments. If you have any questions, please contact the undersigned.

Steve Leighton - President  
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A handwritten signature in black ink that reads 'STEVE LEIGHTON' in all capital letters. The signature is written in a cursive, slightly slanted style.