

JUL 14 2009

WATER QUALITY PROGRAM

July 13, 2009

Jeff Killelea
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Mr. Killelea,

I own a small recycling facility and am very concerned with the new draft Washington State Industrial Stormwater General Permit. I fear this will put myself and other small businesses out of business without even addressing the real source of the problems. I strongly object to the draft Permit as now proposed.

First of all, it is way too complex for me to understand. I am trying my best to keep my head above water in running my business in these very challenging times, so I don't have the understanding or the time or resources to figure it out and comply with it. I have no source of expertise to figure this out so it must be much simpler for people like me to understand and implement.

Also, the ridiculously low limit on copper in stormwater is crazy. The copper from automobiles on highways is so many millions time above the miniscule amount we contribute it isn't worth comparing. So the permit as proposed will do a lot to kill our business and most other small businesses in our industry, while at the same time doing nothing to reduce the amount of copper in our rivers and lakes because nearly all of it is coming off public roads, streets, and highways.

Thirdly; the cost to our state will be staggering in lost productivity and lost revenues from our industry in the event of our demise. The amount will be well over \$50,000,000 annually due to the lost revenues from our industry and new costs to the state to do what we do, which is re-use of the end-of-life vehicle waste stream. This, as you know, is the highest environmental priority set in state law for any waste stream, yet this permit will effectively eliminate the vehicle recycling industry. This doesn't make any sense to me at all.

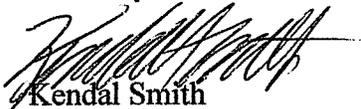
Next; who will handle the junk vehicle waste stream when we no longer are here to do it? You know who will do it, illegal operations that drain the wastes who knows where across this state to prepare junk cars for recycling. And they will disappear without a trace except for the huge environmental toll left behind.

In conclusion; The vehicle recycling industry is struggling to survive and this draft permit could well be the straw that breaks our back if not re-written. So I sincerely hope you will carefully review the suggestions of the Independent Business Association on how to make this permit work far better for small businesses and ultimately for our environment and our future.

Thank you for considering what I have written, and thank you in advance for making changes to the permit so our industry can survive and most efficiently manage the junk vehicle waste stream (re-use), while at the same time protecting the environment by collecting and properly disposing of many substances from junk vehicles. This will allow us to continue to collect taxes for the state, employ

workers, pay our business taxes, and help keep the cost of auto repairs and vehicle insurance down through our sale of used auto parts.

Sincerely



Kendal Smith
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Cc: Governor Gregoire
Senator Roach
Rep. Roach
Rep. Hurst