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Jeff Killelea
Department of Ecology
PO Box 4760
Olympia, WA 98504

July 15, 2009

Re: COMMENTS ON THE DRAFT INDUSTRIAL STORMWATER GENERAL PERMIT

Dear Mr. Killelea,

Thank you for the opportunity to comment.

Stormwater Pollution Prevention Plan (SWPPP)

- General Housekeeping [S3 (B) (3) (b) (1) (3) (a)]
 - While quarterly vacuuming of paved surfaces should prove to be helpful in limiting stormwater pollution, some permitted facilities may need to be vacuumed on a weekly or daily basis to achieve any real benefit. Such a schedule could prove to be financially burdensome unless some type of tax credit or fee rebate could be offered to offset the initial capital cost.
 - Also will there be a specific horsepower or size of vacuum appliance to be allowed or will household units be deemed as sufficient on a quarterly basis?
- Employee Training [S3 (B) (6)]
 - Annual stormwater training for employees engaged in industrial activities that may come in contact with stormwater is important. However the term "employees" could include temporary day labor and contracted vendors on site. It is requested that the term "facility" be added to the sentence "...SWPPP training for *facility* employees who have duties in areas of industrial activity..." This will clarify that only facility employees require training.

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Benchmarks and Effluent Limitations

- Conditionally Authorized Non-Stormwater Discharges [S5 (D) (1) (b) (v)]
 - This portion of assessment may prove difficult to evaluate as without a visible sheen or laboratory analysis, it could be presumptuous to evaluate untested waters for exceeding listed stormwater parameter benchmarks which are only indicators of possible violations of water quality standards.

Inspections

- Inspection Frequency [S7 (A) (2)]
 - While the certification process is currently unknown and no process is in place for this task, will the certification be provided by the Department of Ecology and will annual training for the certified inspector be required?
 - The cost and course type should be of a minimal nature as some permitted facilities may require more than one certified stormwater inspector. The person conducting facility inspections or collecting stormwater samples may not possess professional certification or advanced training.

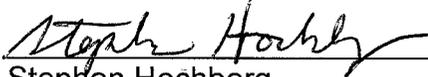
Corrective Actions

- Level 2 Corrective Actions [S8 (B)]
 - It was stated at the Ecology Stormwater Workshop on July 13th, that a permitted facility in Level 2 Corrective Actions could achieve consistent attainment for all of their testing parameters and still be listed in Level 2 Corrective Actions. This would appear to be counterproductive.
 - It is requested the Department of Ecology establish a structure or framework for permitted facilities to be delisted from Corrective Actions after having achieved consistent attainment for the offending parameter(s). This should provide an incentive for facilities to reduce their environmental impact.

Permit Fees

- Permit Fees [S11]
 - While technically not part of the permit, it can not be avoided in noticing the disparity or unfairness in how the permit fees are assessed. A company's gross annual revenue is not a fair representation of a permitted facilities stormwater pollution potential. A fee based on a facility's potential stormwater related acreage would appear to be more representative to a company's environmental impact.

Again, thank you for this opportunity to comment and I sincerely hope you accept our thoughts as offered respectfully,



Stephen Hochberg
Environmental Specialist CHMM
Trident Seafoods