



(Via email with hard copy to follow)

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RE: Comments – Proposed Industrial Stormwater General Permit

Drear Mr. Killela:

Following are our comments on the draft Industrial Stormwater General Permit.

S.3.B.3.b.i.1. (p.16) and S.3.B.3.b.ii.1. (p.19) As written, does this mean EVERY applicable Operational Source Control BMP is required and/or justified as unnecessary or not possible?

S.3.B.3.b.i.3.a. (p.16) Vacuuming of paved surfaces quarterly appears to be mandatory. This is an expensive proposition likely to have minimal water quality impact for many facilities. It should be left as an OPTION, not a requirement.

S.3.B.3.b.i.5 a. (p.17) Is there a minimum size requirement that would necessitate containment? (As “tanks” are mentioned, I would assume they are the only containers covered, but this is unclear). Would indoor tanks require containment?

S.3.B.3.b.i.5.b. (p.17) Spill kit contents should be left to the operator. For example, storm drain plugs/covers are not needed at all operations. I would suggest changing the “shall include” to “should include the following items, as applicable”.

S. 4. B. 6. (p. 23) Facilities that have obtained consistent attainment in the past should not have to start over and resample all parameters – if consistent attainment was achieved under the previous permit, it should carry over under the terms of the new permit.

S. 5. A. (p. 24) The benchmark for turbidity has been changed to become the new action limit and the previous action limit of 50 NTUs was eliminated. Based upon the data presented in “Stormwater Characterization by Industrial Group”, 25 NTUs is not a realistic action limit for many industrial groups and could put many facilities into level 3 or level 4 corrective action very quickly. We suggest the action levels for turbidity be reestablished at 50 NTUs for at least some industrial groups, and/or establish a variable benchmark related to the NTU level of upstream receiving waters at the time of discharge sampling.

S.7. A. 2. (p.32) Why are Professional Engineers automatically qualified to conduct inspections? What would an EE or ME for example, know about stormwater? I believe CEPSCs should also be allowed to

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conduct inspections. It is impossible to comment on the CISM program without knowing more of the details. While additional training is a good idea, who will do the training? What will it cost? If the state will administer the program, are there funds available to do so? The 2012 and 2013 deadlines seem very ambitious. There should be a provision for a training the trainer type of system whereby one person from a facility can receive training and then train others involved in stormwater activities at the facility.

Please feel free to contact me at 815-431-2201 or by email at sarmentrout@unimin.com should you have any questions.

Respectfully,
Unimin Corporation

Susan M. Armentrout
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CC: Kerry Kelley