



July 9, 2009

Mr. Jeff Killelea  
Water Quality Program/ Industrial Stormwater General Permit  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

**RE: Proposed Permit Modifications for Industrial Stormwater General Permit: Jan 1, 2010**

Dear Mr. Killelea:

WaferTech is hereby submitting comments regarding proposed modifications to the Industrial Stormwater General Permit regulations for Draft issued June 3 2009:

1. S3 (SWPPP) B.3.b.i.3)a: Best Management Practices, page 16 Good Housekeeping:  
**“The permittee shall vacuum paved surfaces with a vacuum sweeper (or a sweeper with a vacuum attachment) to remove accumulated pollutants a minimum of once per quarter.”** This assumes this activity is needed quarterly and will create unnecessary dust, particulates and green house gases, if the paved surface doesn't need to be cleaned. WaferTech will incur considerable cost for this activity. WaferTech proposes to change wording to: “paved surfaces should be inspected quarterly and vacuumed if accumulated pollutants are found.”
2. S3 (SWPPP) B.3.b.i.3)b: Best Management Practices, page 16 Good Housekeeping: **“All sources of dust shall be identified and prevented from accumulating on hard surfaces at the facility”**. All sources of dust may not be able to be identified, if accumulated dust from a source off-site is blown onto Facility surfaces, for instance during a wind storm. WaferTech requests additional description for this requirement, such as “identification for industrially generated dusts” or delete the requirement if not able to do so. Consider making this requirement applicable to sites with heavy dust build-up.
3. S3 (SWPPP) B.3.b.i.3)c: Best Management Practices, page 16 Good Housekeeping: **“All dumpsters shall be fitted with a lid that shall remain closed when not in use.”** WaferTech has some open dumpsters which are used for recycling wood, plastics and metals. These are not sources which contribute to stormwater pollution and these would become less safe to discard materials into, if a heavy lid was required for them. The bins are owned by AGG & Smurfit for recycling purposes. WaferTech proposes changing the wording to require all solid waste dumpsters, *which may create leachate or particulates*, to be fitted with a lid & remain closed.
4. S3 (SWPPP) B.3.b.i.4) a: Best Management Practices, page 17 Preventive Maintenance:  
**“Clean catch basins when the depth of debris reaches 60% of the sump depth. However, in no case shall there be less than 6 inches of clearance from the debris surface to outlet pipe.”** Determining 60% of sump depth will be difficult for sites which have over 100 storm

drains. Opening the storm drain frequently is a safety concern due to the heavy lifting of the grate. WaferTech has an inspection & maintenance schedule for the facility storm drains and the storm drains are fitted with oil & debris stormwater inserts. These inserts do not drain, if they are plugged with debris or have reached their removal capacity. WaferTech changes these inserts on an annual basis or sooner if needed. WaferTech proposes that this become a requirement for storm drains which are not fitted with storm drain inserts.

5. S3 (SWPPP) B.3.b.i.6) d: Best Management Practices, page 18 Employee Training: **“A log of the dates on which specific employees received training, (added to the SWPPP).** This creates unnecessary paperwork for companies with electronic training records. WaferTech training records are maintained in a paperless, electronic SAP system, managed by the Learning & Development Department at WaferTech for nearly 1,000 employees. This is an environmentally friendly system, with records easily assessable for review by DOE. WaferTech proposes this requirement to be changed to “training records shall be maintained for 5 years and readily assessable”.
6. S5 Benchmarks & Effluent Limitations Table 2, page 24: **Zinc, total 2.5 micrograms/ liter lab quantitation level.** This low lab quantitation level is unreasonably low. A Portland area certified laboratory has a minimum report limit of 5.0 micrograms per liter for zinc and a minimum detection limit of 2.7 micrograms per liter. Zinc is a background contaminate in numerous sources of soil and water. A lab quantitation level this low may not be met, simply due to background contamination and not necessarily from the stormwater being contaminated with pollutants. WaferTech is hereby requesting the lab quantitation level for zinc be set at 5. micrograms /L, which is within testing detection limits and will remove background contamination concerns.
7. S7 Inspections A.2, page 32 Inspection Frequency: **“Beginning Jan. 1, 2012 visual inspections shall be conducted by a Certified Industrial Stormwater Manager (CISM), Certified Professional in Stormwater Quality or a Professional Engineer.”** There is no discussion on how this requirement will be accomplished. Is WA. DOE planning to hold workshops to certify state-wide environmental staff? WaferTech was able to find one certification class offered in the State of Washington, in the Seattle, which required application fees, 1-day pre-exam preparation, followed by an exam. At a time when resources are stretched for both state agencies and businesses, this is a cost that doesn't seem reasonable and may not provide any actual benefit to the environment. The Department of Ecology needs to provide more information on these certification requirements. WaferTech requests that this requirement be removed or that Washington State Department of Ecology commit to setting up free certification classes at various locations throughout Washington in 2010-2011 to ensure that the industries of this state have an opportunity to comply with this requirement.

WaferTech would like to thank-you for considering our comments. Please feel free to contact me directly at 360-817-313 with any questions, or if you would like further clarification on these comments.

Sincerely,

Judy Schramm, CHMM  
Environmental Engineer  
WaferTech L.L.C.