

[Received at 9:46 p.m. PDT, September 9, 2010.]

Sharleen--

Upon review, I have amended my comments, submitted September 8th, slightly. Below are the changes. A comment on page 11 is added. The previous comments on page 11 and 13 are clarified. Please add these revisions to my prior comments. Sorry for the confusion.

Page 11, Ground Water Discharges

Ecology has changed the language such that it suggests that permit holders must sample groundwater discharges to ensure that they "meet the terms and conditions of this CSWGP." Please clarify whether Ecology is asking applicants to sample water prior to infiltration.

Page 11, Demonstrably Equivalent

Notifying Ecology no less than 60 days prior to the use of a BMP that is demonstrably equivalent is burdensome and all but ensures that only BMPs in Ecology-approved manuals are used regardless of the ability of a BMP to improve stormwater quality. This requirement further stymies the intent and promise of the Stormwater Research Center to promote effective, emerging stormwater technologies.

Page 13, Inspections

The inspection frequency remains unnecessarily burdensome, especially for sites with continuous discharge (e.g., designed drainage and dewatering sites). The current language suggests that sites with discharges that start and stop multiple times during the week must have multiple inspections. However, one inspection in a week is sufficient to determine whether BMPs are functioning properly, particularly because most permittees will visit the site when raining to get an accurate site assessment and sample. Please strike "any" and/or revise the phrase "and within 24 hours of any discharge from the site."

Thank you.

Jodi