

CPM DEVELOPMENT CORPORATION

CORPORATE OFFICE • 5111 E BROADWAY • SPOKANE VALLEY, WA 99212
P.O. BOX 3366 • SPOKANE, WA 99220-3366 • OFFICE: (509) 534-6221 • FAX: (509) 536-3051



Central Pre-Mix
Concrete Co.



Central Pre-Mix
Prestress Co.



Inland Asphalt Co.



Interstate Concrete
& Asphalt Co.



ICON Materials



Wenatchee
Sand and Gravel



Central Washington
Concrete



Eugene
Sand & Gravel



Viking Redi-Mix



Green & White
Rock Products



Klamath Pacific
Corporation

Bandon Concrete
& Development



River Bend
Sand and Gravel



Salem
Road & Driveway



Valley
Concrete & Gravel

August 10, 2015

Department of Ecology
Attn: Ms. Amy Moon, Water Quality Program
P.O. Box 47696
Olympia, Washington 98504-7696

Subject: Comments on Draft Construction Stormwater General Permit.

Dear Ms. Moon,

CPM Development Corp. appreciates the opportunity to offer comments and suggestions on the Department of Ecology's Draft Construction Stormwater General Permit published July 1, 2015. CPM Development Corp. is submitting the following comments (note all page numbers are referenced to the published red-line version):

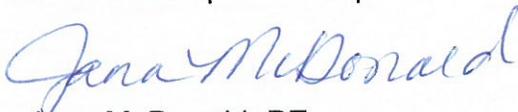
1. S1.C.3 - The restriction the Agency is imposing on the use of potable water on jobsites related to chlorination levels is completely unrealistic and unachievable. Potable water is most often the only source of water available at jobsites and it is unrealistic to impose significant restrictions on this use of this water. Such a restriction impedes the ability of contractors to conduct business. Dechlorination of potable water should not be required for dust control, if it is hot and dry, the majority of it is going to evaporate. The language related to chlorinated potable water should be removed from the permit.
2. S2.A.1.f - The construction stormwater general permit is a NPDES permit that regulates water quality. This permit is not a solid waste permit and Ecology is attempting to regulate solid waste through a water quality permit. The Agency is setting an undefined threshold when requesting information related to soils "contamination" on a jobsite. This entire section of permit should be removed as it is not feasible, it is burdensome, and will have significant impacts on contractors and construction jobs.
3. S4.D.2 - What does the Agency mean when saying "...until the recycle concrete is fully stabilized..."? Ecology should re-consider the language in this section as this objective may never be technically achievable.
4. S9.D9.g - The language in this section refers to a permittee managing the pH of water to protect surface and ground water. The CSGP does not regulate ground water discharges and the use of the word Groundwater should be removed in this section. The CSGP should be consistent with the regulations and not allow language that doesn't reflect the rules in the permit.

5. S9.D9.h - Concrete washout water is allowed onto the ground in areas that are formed and set to receive concrete paving within a short period of time (1 to 2 days). This is information which the Industry has received directly from Ecology and this should be maintained in the proposed permit. There are limited options for washing out concrete truck chutes and the option of washing into formed (i.e contained) areas is critical to ensure smooth jobsite operation. Areas which are formed and set to be paved and where a truck washes out receive very little washout water. The permit should be revised to allow this practice to continue.

Thank you for the opportunity to provide comments on the draft Construction Stormwater General Permit. Please feel free to contact me at 509.534.6221.

Sincerely,

CPM Development Corp.



Jana McDonald, PE
Environmental Engineer