

Permit Section	Comment
S.1.D.4.	<p>We appreciate the proposed blue font edits for this section, but please consider including more inclusive language because shaft drilling occurs on other projects (e.g., tunnel portals, underground transportation and wastewater facilities, etc.).</p> <p>Please consider adding the language insert in red font below:</p> <p style="text-align: center;"><i>Slurry materials and waste from shaft drilling, <u>including process wastewater from shaft drilling for construction of, including but not limited to, tunnel portals, underground transportation and wastewater facilities; building, road, and bridge foundations unless managed according to Special Condition S9.D.9.</u></i></p>
S.1.D.4.	<p>Please clarify that the only process wastewater that can be managed per Special Condition S9.D.9 is uncontaminated water from water only based shaft drilling. It is not clear that slurry materials and waste can be managed per S9.D.9. Perhaps if it were worded as follows, it would provide clarity:</p> <p>Please consider adding the language insert in red font below:</p> <p style="text-align: center;"><i>Slurry materials and waste from shaft drilling, <u>except process wastewater from water-based shaft drilling for construction of, including, but not limited to, tunnel portals; underground transportation and wastewater facilities; and building, road and bridge foundations may be managed pursuant to Special Condition S9.D.9.j.</u></i></p>
S.1.D.4.	<p>King County recommends the formation of an Ecology-led intergovernmental Process Wastewater Task Force to fully identify the issues and potential solutions regarding process wastewater management and disposal. King County appreciates the improvements made to the draft permit for managing uncontaminated water-only based shaft drilling water, and encourages Ecology to pursue similar management options for other sources of uncontaminated process wastewater. Though House Bill 1695 relates to the reuse of aggregate and concrete, Section 1 (e) recognizes the environmental value in reducing truck trips. The ability to manage uncontaminated process wastewater on-site can certainly reduce truck trips, especially in rural areas where viable disposal locations can be many miles from the construction site.</p>
S2.A.1.f.	<p>Clarify expectations for site review and how much pre-sampling constitutes due diligence. In addition, a process flowchart or additional details explaining how a permittee proceeds once contamination is identified on a site would be incredibly helpful. This process should also clarify what the permittee should do if contamination is discovered when construction is underway and a CSWGP has been issued to the site.</p>

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S4.C.2.g.	Please better clarify what "stabilized" means.
S5.F.	<p>Regarding the language below, please clarify specifically what effluents and what limits:</p> <p style="text-align: center;"><i>In the event the Permittee is unable to comply with any part of the terms and conditions of this permit, and the resulting noncompliance may cause a threat to human health or the environment, <u>or exceed numeric effluent limitations</u>, the Permittee must, <u>upon becoming aware of the circumstance</u>:</i></p>
S9.D.9.b.	Secondary containment: if possible, add clarification that secondary containment should be made of material that can withstand the chemical / pollutant it is intended to contain (and for an appropriate duration). Without more distinct guidelines, the consequences are that the cheapest options are often purchase (e.g., kiddie pools). Cheaper options might ensure containment for the short term. However, the unintended consequence is increased containment failure and plastic disposal, which is not environmentally friendly.
G2	Please provide an option for permittees to submit paper copies of NOIs. Some agencies have an internal process requiring a formal hardcopy signature process from a high-ranking official; it would not be practical for this person to have a signatory account.
APPENDIX A – DEFINITIONS Page 61	<p>Please consider adding the language insert in red below:</p> <p>Water-only Based Shaft Drilling is a shaft drilling process that uses water only and no additives are involved in the drilling of shafts for construction of, <i>including, but not limited to, tunnel portals; underground transportation and wastewater facilities; and building, road, or bridge foundations.</i></p>
General Comment	In terms of when are you supposed to prepare / submit written reports to Ecology for "non-compliance," clarify what it means / when is this triggered.
General Comment	<p>King County recommends the formation of an Ecology-led intergovernmental Process Wastewater Task Force to fully identify the issues and potential solutions regarding process wastewater management and disposal.</p> <p>Chris Tiffany, Senior Water Quality Planner, King County Department of Natural Resources and Parks, Wastewater Treatment Division, would be pleased to volunteer as a panel member / participant.</p>

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General Comment	<p>The PDF of the permit on Ecology's website is not searchable with Adobe Reader. Please post a searchable version.</p> <p>Other helpful tools for the future:</p> <ul style="list-style-type: none">• Mobile version of the DOE website, CSWGP, or SWMMWW. These would be great when hardcopies are not within the immediate vicinity.• Flowcharts for processes with more than a few steps.