

From: Pete <parjr64@yahoo.com>
Sent: Thursday, August 06, 2015 12:14 PM
To: ECY RE CSWGPCComments
Subject: Draft 2016 Construction Stormwater General Permit (NPDES) comments

Hello, I have some comments to share below on the Draft 2016 Construction NPDES permit.

Reference section S8.A.1 - An NPDES NOI received an inquiry from a Ecology Permit Administrator on the plan to control construction stormwater discharge to a waterbody impaired by temperature? It was explained to the Ecology representative, temperature is not listed as a parameter we need to be concerned with per section S8.A.1. To satisfy Ecology request, the applicant was able to plug the outfall location for the project duration to ensure no discharge from the site. With this improvement, the applicant requested their NPDES NOI be rescinded since the project would not discharge construction stormwater to surface waters. The rescinded request was granted by Ecology. Recommend that even though the current NPDES permit identifies additional monitoring requirements for construction stormwater discharges to impaired waterbody listed for fine sediment, high pH, turbidity or phosphorous that temperature be added to that list. Plus, more guidance should be added to help the applicant be aware that other water quality impairments may be applicable to a project.

Reference section S9.B.1.f - Recommend further information be added in the permit to what is expected to be included for the engineering calculations? Do the calculations need to be stamped by a Professional Engineer and included in the SWPPP or TESC plan?

Reference section S9.D.5 - I have seen many construction sites where construction stormwater ponds up onsite and remains there with nowhere to go but infiltrate without a means of entering surface waters of the State. With these sites, plastic cover is the typical temporary BMP of choice to cover disturbed soils to satisfy either the 2 or 7 day coverage rule. The use of plastic cover can be helpful, but at the same time it is harmful to the environment especially in large quantities in our landfills where it ends up not decomposing for a very long time. Instead of covering exposed soils with plastic cover, I recommend Ecology inspect only the outfalls to where construction stormwater discharges to. If compliant with the permit, but a mud bath or eroding within its construction perimeter (for example), that condition should not be regulated under the permit. The construction stormwater discharge points where construction stormwater enters surface waters of the state should be the inspected regulated points of compliance. If this sustainable recommendation is considered, at a minimum a temporary perimeter BMP should be in place unless treatment through native vegetation is selected as the bests BMP strategy of choice.

Thank you,

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