

## Centralia ISWGP

Warren Hansen.

My name is Warren Hansen. I am a partner with Winword Environmental, Seattle, Washington. My mailing address is 200 West Mercer Street, Ste 401, Seattle, Washington, 98119. First of all, I would like to start by standing...also, I would like to state that I am a consultant, professional engineer in the state of Washington, and I am providing this testimony on behalf of Schnitzer Steel, as their consultant.

First of all, I would like to extend our appreciation to the Department of Ecology for holding these workshops and this opportunity. At this time, I am not going to be providing any written comments. We plan to do so, either in conjunction with other parties or on behalf of Schnitzer before the deadline of January 10<sup>th</sup>. At this point, I simply want to let you know that we are reviewing the draft permit and comparing it to the existing requirements and also wanted to give the department a preview of the issues that we will be perhaps focusing on. And, very briefly, those will be of course the

- reduced limits...threshold limits for zinc and particularly copper. The state's own studies have shown that there are numerous failures on the part of permitted entities in meeting, for example, zinc limits, and that the sources of zinc need to be further evaluated in assisting these permitted entities in complying with these limits.
- The second item is the proliferation of engineering reports that will probably occur under the new system of action levels and the occurrence of exceeding the criteria that are set forth in the draft permit. I am a professional engineer, so certainly I'll be busy, but I think with this number of reports, it may place an undue burden upon the department of Ecology for review.
- A third item are the implementation of corrective action for all analytes, even though one might only exceed, for example, zinc. There was some discussion of that today in the question and answer session. We'll be looking at those responses and formulating any comments as we feel may be appropriate.
- There have also been - the fourth of my five items, detection limits. Lower detection limits which may or may not be achievable by state laboratories. That's something else we'll be examining to see if that may pose or not pose certain difficulties for the permitted community out there.
- And finally, just the logistics and everyday issues of sampling for stormwater. The complexities. I know there are elements in the permit that require a first flush sampling, for example, and also training for individuals conducting sampling. While training is certainly admirable, we feel that there might be changes for people who are required to do training to do that on the internet, for example.

So, those are 5 areas we'll be looking at as we continue to review the details of the permit. There may be more.

I thank the Department of Ecology for this opportunity to provide this testimony and comment, and we look forward to further discussions.

Thank you very much, Mr. Hanson.