

DEPARTMENT OF ECOLOGY

JUN 1 2014

WATER QUALITY PROGRAM



June 9, 2014

Mr. Jeff Killelea  
Water Quality Program/ Industrial Stormwater General Permit  
Washington State Department of Ecology  
PO Box 47696  
Olympia, WA 98504-7696

**RE: Proposed Permit Modifications for Industrial Stormwater General Permit Jan 1, 2015**

Dear Mr. Killelea:

WaferTech is hereby submitting comments regarding proposed modifications to the Industrial Stormwater General Permit regulations for Draft issued May, 2014.

- S3 B.4.b.i.2) a, page 17:  
**“Vacuum paved surfaces with a vacuum sweeper (or a sweeper with a vacuum attachment) to remove accumulated pollutants a minimum of once per quarter.”** WaferTech is requesting that this requirement be changed to an annual requirement for facilities that have met benchmark, are in compliance with all stormwater permit requirements and have no corrective actions pending or open. The reason for this request is that, for some sites with relatively clean roadways and parking lots this is an added expense without much benefit in reducing pollutants. Facilities with good BMPs such as detention ponds, catch basins with inserts with oil absorbing mini booms, etc. are in compliance and meeting benchmarks should have some relief from this requirement. WaferTech believes an annual vacuum sweep would be adequate to keep the site in compliance with all stormwater permit requirements and would not cause any increase in deterioration of surface water.
- S9 E.1.c, page 43:  
Request to change the deadline for a detailed written report for reporting permit violations from 5 days to 15 business days. Although WaferTech has not reported any permit violations, and does not expect to, we do believe that 5 days may not be adequate to perform a thorough detailed investigation on root cause and corrective actions in the event of a stormwater permit violation. The additional time would allow for a more complete report and would allow internal management time to review it and comment, prior to submittal to Department of Ecology. The 15 day requirement is consistent with other agency reporting deadline requirements for reporting upsets.

I would like to thank-you for setting up the local workshops and discussing the proposed changes with the permittees, it is appreciated.

Sincerely,

Judy Johansen, CHMM  
Environmental Engineer  
WaferTech L.L.C.