

Highfill, Kelsey (ECY)

From: Katya [katbrid@msn.com]
Sent: Sunday, June 15, 2014 7:01 PM
To: ECY RE Industrial Stormwater Comments
Subject: draft stormwater permit

Dear Mr. Killelea:

I am interested in the state's draft industrial stormwater general permit to see how it compares with the federal stormwater requirements.

In general, it does not appear that the state permit (or fact sheet) provide any kind of real characterization of the discharges that have occurred under the present permit, nor does it require permittees to characterize future stormwater discharges during the next permit term. The federal stormwater permit requires that operations characterize their discharges through a composite sample taken either during the entire discharge or for the first three hours of the discharge. The state's draft permit states that a "single grab sample" is an example of a "representative sample". I do not believe that a single grab sample is representative of the actual amount of pollutants that are discharged during a storm because there are too many variables:

- The person taking the sample may not grab the sample correctly.
- The rate of discharge flow changes from one storm to the next and within the term of any storm.
- The concentration of pollutants is variable over time within any given storm and among different storms.

It would appear that the state permit should be at least as protective of the environment as the federal requirements, but this monitoring proposal is not. The requirement for representative samples needs to change to be in line with the federal requirements.

Thank you for the opportunity to comment.

Sincerely,
Katherine Bridwell
Bainbridge Island, WA