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Department of Ecology
Attn: Mr. Jeff Killelea
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Olympia, WA 98504-7696

Subject: Glacier Comments on 2014 Draft Industrial Stormwater General Permit

Mr. Killelea,

Glacier Northwest, Inc. dba CalPortland (Glacier) appreciates the opportunity to offer comments and suggestions on the Department of Ecology's Draft Industrial Stormwater General permit (ISGP). Glacier is submitting the following comments:

1. S1.E.1: Glacier finds the requirement in S1.E.1 to be contradictory to condition S1.C.3. Under the Draft ISGP, industrial sites that discharge stormwater to both surface water and ground water are required to obtain permit coverage However, S1.E.1 suggests that in situations where a site has both surface and ground water discharges that all permit conditions apply to both discharges. The permit does not pertain to groundwater discharges and does not contain groundwater quality monitoring standards. It would be illogical to extend surface water quality standards (such as turbidity or TSS) to ground water discharges. The permit should clarify that water quality monitoring is not required for ground water discharges.

2. S3.B.4.b.i.4.c: Glacier finds that the language in S3.B.4.b.i.4.c regarding the location of spill kits in relation to stationary fueling stations to be overly specific. The 25 feet requirement does not take into consideration the variance between industrial sites. The requirement also restrains the ability of permittees to analyze and implement the most efficient method of handling a spill and the most efficient location to store spill containment materials. Glacier suggests the standard for spill kit location to be revised to read, "Spill Kits must be located where practicable within 25 feet of petroleum sources".

3. S6.C.2: A requirement for permitted industrial sites discharging to a Puget Sound Sediment Cleanup Site to implement "additional storm drain line cleaning BMPs, solids sampling, and reporting," has been added to the Draft ISGP. Glacier objects to this additional requirement due to the fact that not all sites discharging to a Puget Sound Sediment Cleanup Site have catch basins or pipes. Many sites have surface

conveyances that flow through swales, French drains or other simple processes before discharging to surface waters. Ecology has developed a one-size-fits-all approach by requiring all sites to comply with the line cleaning and catch basin sampling with an ill defined system for sites to obtain individual waivers. The requirement does not specify a method to request a line cleaning waiver or specify how long obtaining such a waiver would take. The waiver requirement would result in the expenditure of unnecessary time and effort from both the permittees and the Department of Ecology to fulfill. Many permitted sites do not have catch basins or pipes and the waiver process should be eliminated and language added in the permit that the cleaning and sampling applies to those sites that contain catch basins and pipes.

4. Table 7: Glacier requests that the Agency provide Quantitation Levels for the Sampling and Analytical Procedures for Storm Drain System Solids. Many species have quantitation levels of TBD. The Draft ISGP should include explicit Quantitation Levels to allow for permittee comment.

5. S9.A.3: The requirement of DMRs and SMRs to be submitted electronically, unless a waiver from electronic reporting has been granted, contains the following example: "e.g., if a permittee does not have internet access." Glacier finds the example to be misleading, as there are certainly other reasons for which a permittee would need a waiver from electronic reporting. Glacier recommends that the example be struck from the ISGP.

6. S9.E.1.c: Glacier finds the language change made in S9.E.1.c regarding the timeframe to submit a noncompliance report in the event of a permit violation to be impractical and unworkable. The revised language requires permittees to submit a detailed written report within 5 days, as opposed to the former 30 day requirement. The report must contain descriptions of the noncompliance, action taken or action that will be taken to remediate the noncompliance, and a plan to prevent reoccurrence of the noncompliance. 5 days does not constitute a realistic timeframe for permittees to submit a report that addresses all of the aforementioned requirements as well as address what those requirements mean to accomplish. permittees must be allowed adequate time to remediate the noncompliance and analyze how to effectively prevent future noncompliance, as well as document and submit a comprehensive report for the Department of Ecology to analyze. Glacier recommends that the revised language be struck and the 30 day submittal requirement remain in the ISGP.

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Thank you for the opportunity to provide comments. If you should have any questions please contact me at 206-764-3000 or mhinck@calportland.com

Sincerely,

Matthew Hinck

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