



JUN 20 2014

June 17, 2014

Mr. Jeff Killelea  
Department of Ecology  
P.O. Box 47696  
Olympia, WA 98504-7696

RE: Comments on Draft Industrial Stormwater General Permit

Dear Mr. Killelea:

I appreciate the opportunity to make a few comments on the draft Industrial Stormwater General Permit. Initially, the availability of a redlined version of the draft permit from DOE is greatly appreciated as this makes review fairly straightforward. A few specific comments are as follows:

1. On page 17 of the redlined version of the draft permit "(in a significant amount)" is proposed to be stricken. Past draft permits have also proposed striking this phrase but, upon comment receipt on this in the past, DOE decided to retain this phrase. No explanation is given in the Fact Sheet why this deletion is necessary. This phrase must remain, as it ties to the permit definition of "*Significant Amount*". Absent this guideline phrase, any ground not covered by asphalt, concrete, or buildings has the "potential" for "erosion" in some amount given a storm of adequate intensity. The permit definition of "*Significant Amount*" puts appropriate constraints on interpretation of this site map requirement, otherwise a permittee would be obligated to conservatively shade all natural ground surfaces as having the "potential" for some amount of "erosion", whether or not it would have any reasonable likelihood of being discharged. The phrase "(in a significant amount)" should not be stricken.
2. On page 67 of the redlined version of the draft permit a new definition of "*Substantially Identical Outfall*" is proposed. While the Fact Sheet mentions this new definition, no explanation is given for the selected language. It seems practical that this definition should focus on both the forms of pollutants and associated control measures at outfalls. The proposed definition sidetracks this focus by introducing requisites such as "general

industrial activities” and “impervious surfaces”, which may not alter either the type of pollutant or control measures associated with a stormwater outfall. For example, excavating, crushing, screening, material handling, and material storage are all distinct, not general, industrial activities but the same potential pollutants are involved. In similar fashion, the same potential pollutants may report to different outfalls, but one outfall area may have an impervious surface, which does not affect either the potential pollutants or control measures. The following definition should retain the utility of “substantially identical outfalls” without compromising stormwater runoff quality:

*Substantially Identical Outfall* means outfalls that share the following characteristics: 1) the same pollutant(s) are likely to be significant contributors of pollutants to stormwater discharges, and 2) the same general types of Best Management Practices are utilized in the drainage area of the outfalls.

Thank you for the opportunity to comment.

Best Regards,

A handwritten signature in cursive script that reads "Dave Holland".

Dave Holland  
Project Manager