

**From:** [Gerry Millman](#)  
**To:** [ECY RE Industrial Stormwater Comments](#)  
**Subject:** 2015 draft permit comments  
**Date:** Thursday, June 05, 2014 8:02:01 AM

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Sir or Madam:

I would like to comment on the proposed 2015 industrial stormwater permit.

Regarding consistent attainment, I think changes should be made to the draft.

1) Many sites are challenged by one or two of the parameters requiring testing. Other parameters are never exceeded, largely due to the site or the type of business they engage in. If a company has never exceeded a benchmark for one of the parameters, for instance zinc, then it seems overkill to require them to continually spend money to test for a parameter that they have never exceeded and likely never will.

2) If a company has achieved consistent attainment during the prior (2010 ) permit, they achieved it through hard work and investment. To look at those companies and now say we will not recognize your achievement and you must start all over is a slap in the face, and another costly regulation. Why not reduce the requirement to something less onerous. For instance, the first 2 quarters need testing to re-instate consistent attainment already achieved. Or, you must test once per year for the first 2 years during the permit to continue with consistent attainment. It is overkill and costly for businesses to continue to test for parameters we have already invested time and money to achieve the benchmarks.

Gerry Millman