

Highfill, Kelsey (ECY)

From: Tom Westergreen [tomwestergreen@hotmail.com]
Sent: Monday, June 02, 2014 7:20 PM
To: ECY RE Industrial Stormwater Comments
Subject: 2015 Draft Comments

Comments on DOE on Draft Industrial Stormwater General Permit

Consistent Attainment:

I strongly do not agree with draft as now written, where rules for consistent attainment will be reset for the 2015 permit and 8 quarters of test results that are equal or less than benchmark values have to be achieved again. Businesses have worked very hard to reach benchmark levels and for some parameters seldom have exceeded them. Further expense of testing should not be required. Instead of the proposed resetting to 8 quarters for possible consistent attainment, several possible suggestions for the 2015 permit could be:

1. Since the new permit is very similar to the old one, do not reset and allow use of 2010 permit sampling be used to determine consistent attainment.
2. If benchmark levels have never been reached during 2010 permit, then consistent attainment is reached for 2015 permit and no further testing is required for those parameters.
3. All parameters that have already reached consistent attainment under the 2010 permit or do reach 8 consecutive quarters of consistent attainment when also using testing under the new 2015 permit would still be required to test all parameters in one quarter annually, starting four quarters after attainment.

Thank you for consideration of these comments to the draft 2015 Industrial Stormwater General Permit.

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