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DEPARTMENT OF ECOLOGY
APR 19 2007
WATER QUALITY PROGRAM

April 19, 2007

Jim La Spina
Department of Ecology
P O Box 47600
Olympia, WA 98504-7600

Dear Mr. La Spina

Our industry has two major concerns about the proposed new industrial stormwater general permit scheduled to take effect on September 20, 2007. Please consider the following comments

The economic analysis shows the cost to small businesses is five to nine times higher than the cost to larger business when figured on a cost per dollar of sales basis. We believe that small businesses should have less costly and complex requirements.

Also, we think that the new Benchmark and Action levels for copper and zinc are set too low and will result in widespread instances of tests showing amounts in excess of the allowed levels. The Fact Sheet for the proposed permit shows reported median levels were almost all above the Benchmark Level and many were above the Action Level. We believe the proposed levels for these metals should be raised substantially in order to be more in line with the levels for other substances

Thank you for your time in considering these matters.

Sincerely,

Barry Fleming

Barry Fleming
GM