

Small Town. Real Life.

April 18, 2007

Mr. Jim La Spina  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600  
industrialstormwatercomments@ecy.wa.gov

**RE: NPDES Phase II Permit Coverage for Maintenance Yards**

Dear Mr. La Spina,

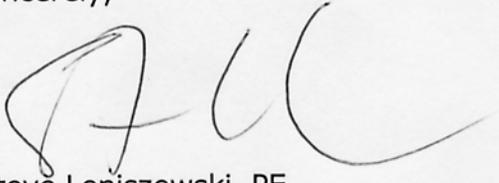
The City of Duvall is currently completing planning activities for implementation of NPDES Phase II MS4 Permit requirements. Duvall plans to complete these activities and implement the Phase II requirements per the schedule outlined within the permit.

A SWMP is being developed for City road maintenance and storage facilities per S5.C "Pollution Prevention and Operation and Maintenance for Municipal Operations." We have been made aware that road maintenance and storage facilities may require additional coverage under the new Industrial Permit. The City of Duvall respectfully requests that municipal road maintenance and storage facilities be covered under the Municipal Permit and not the industrial permit for the following reasons:

1. The municipal coverage requirements appear sufficient for municipal road maintenance and storage facilities. Additional coverage requirements under the Industrial Permit may increase reporting and paperwork requirements without resulting in increased environmental protection.
2. Coverage under multiple permits may result in confusion on which permit takes precedence and which permit requirements are to be implemented.
3. Multiple permits will result in inefficiencies with the implementation and reporting process. Splitting effort between the two permits and their respective requirements may result in reduced comprehensiveness.
4. The requirements for road maintenance and storage facilities under the Municipal Permit can be updated at the time of permit re-issuance should it be determined that additional requirements, or requirements of the Industrial Permit, be required.

The City of Duvall appreciated this opportunity to comment on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Leniszewski', written in a cursive style.

Steve Leniszewski, PE  
Public Works Director  
City of Duvall

cc: Mayor Will Ibershof