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Posted At: Friday, April 20, 2007 11:31 AM
Posted To: Industrial Stormwater Comments
Conversation: Public comment to industrial stormwater general permit
Subject: Public comment to industrial stormwater general permit

Mr. LaSpina,

Comment: S1. Permit Coverage. The description of required permit coverage for rail transportation facilities under the new permit appears overly broad to include non-industrial activities. The description may be interpreted to include all areas of the rail transportation system including tracks (yard tracks, side tracks, cross-country tracks) and small office building parking lots. The existing permit, Appendix 1. C. 8 TRANSPORTATION FACILITIES clearly describe “Only those portions of the facility that are either involved in vehicle maintenance, equipment cleaning operations.....” are considered to be engaging in industrial activity and therefore covered under the general permit.

Request: Modify Table 1., page 5 to clarify that only the following rail transportation related industrial activities are covered under the new permit, for example “Railroad Transportation ~~and~~ vehicle maintenance shops (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication).

Sincerely,

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