



## Kitsap County Department of Public Works

APR 16 2007

WATER QUALITY PROGRAM

614 Division Street (MS-26), Port Orchard, WA 98366-4699

R. W. Casteel, P.E., Director

April 12, 2007

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

### Re: Comments on Draft Industrial Stormwater General Permit

Dear Mr. LaSpina:

Kitsap County commends you in your efforts to create an effective industrial stormwater permit. We have one concern regarding the applicability of the permit.

S1A: Facilities Required to Seek Coverage Under This General Permit – Recent electronic communications from Ecology staff have insinuated that municipal operations facilities used to house and maintain equipment used in road construction and maintenance would require coverage under this permit. We would like to state our opposition to this proposal for two specific reasons:

- 1) Road construction equipment storage and maintenance is not covered by any of the Standard Industrial Classification groups listed in Table 1 of the draft permit.
- 2) S1D5 of the draft permit excludes "any facility authorized to discharge stormwater under an existing individual or general permit". The Phase II general permit covers discharges from road right-of-ways and maintenance yards; and, heavy equipment maintenance or storage yards and material storage facilities (Section S5.C.5.f, g, i). Therefore facilities used to house and maintain equipment used in road construction and maintenance are excluded from the industrial permit.

Thank you for the opportunity to comment on this draft permit. Any questions regarding this letter should be directed to David Tucker at (360) 337-7292.

Sincerely,

Randy Casteel, P.E.  
 Director

cc: Commissioner Chris Endresen  
 Commissioner Jan Angel  
 Commissioner Josh Brown  
 County Administrator Nancy Buonanno Grennan  
 County Engineer Jon Brand  
 Road Maintenance Superintendent Don Schultz