**From:** Melanie May [mailto:MMay@lakehaven.org]
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**Posted To:** Industrial Stormwater Comments
**Conversation:** Comments on proposed draft Industrial Stormwater General Permit
**Subject:** Comments on proposed draft Industrial Stormwater General Permit

The following comments are submitted by Lakehaven Utility District.

S5. BENCHMARKS, ACTION LEVELS, AND DISCHARGE LIMITATIONS

A. Benchmarks, Action Levels and Sampling Requirements Applicable to Permittees Discharging to Non-303(d)-listed Water bodies

**Methods/Quantitation Levels**

Table 2, "laboratory quantitation level", is Ecology trying to specify the MDL, (method detection limits) that the labs must meet or an actual ML (minimum level), which is usually a multiple of the MDL? The values listed appear to be MDLs (except for turbidity which appears to an error).

Table 2 of draft permit, the turbidity quantitation level is listed as zero; this appears to be a typo. The Fact Sheet Table 47 shows a quantitation level of 0.05 NTU. Analytically, it is not possible to measure to zero. Non-detects are reported as less than some minimum measurable amount.

Table 2 of draft permit, the oil and grease quantitation level is listed as 1.4 mg/L. The Fact sheet lists the quantitation level as 4.5 mg/L (1.4 x 3.18). The actual method, 1664, lists the MDL as 1.4 mg/L and the minimum level of quantitation as 5.0 mg/L. The oil and grease quantitation level should be 5.0 mg/L.

Table 2 of draft permit, the copper quantitation level is listed as 0.5 ug/L, the MDL. The Fact Sheet Table 47 lists the quantitation level as 1.6 ug/L, which is the ML value from the Permit Writers Manual. The copper quantitation level should be 1.6 ug/L.

Table 2 of the draft permit, the zinc quantitation is listed as 1.8 ug/L, the MDL. The Fact Sheet Table 47 lists the quantitation level as 5.7 ug/L, which is the ML value from the Permit Writers Manual. The zinc quantitation level should be 5.7 ug/L.

**Parameters**

Replacing turbidity with TSS was suggested in the *Evaluation of Washington's Industrial Stormwater General Permit* report (6415 report). TSS should replace turbidity as a core parameter for the reasons stated in the 6415 report.

**Benchmark/Action Levels**

TSS benchmark level of 18 mg/L suggested in the 6415 report seems too low compared to the 30mg/L monthly and 45 mg/L weekly limits set by the secondary treatment standards.

S8. CORRECTIVE ACTIONS

The approach to corrective actions described in the 6415 report presents a more achievable way of implementing effective solutions. Using the annual median value is a more appropriate approach to comparing results to benchmarks/action limits due to the variability of stormwater results. The system of corrective actions given in the draft permit can result in going up to the next level of corrective action before the actions taken at the previous level have had a real opportunity to show whether they were effective.

B. Level Two Corrective Actions

4. Within six months of starting a Level Two Corrective Action, complete installation/construction of additional **capital BMPs**….

comment – six months is not sufficient time to implement **capital BMPs**, depending on that amount of the capital expense, the item would need to be added to the next year's budget.

C. Level Three Corrective Actions

4. … The Level Three Report shall include an implementation schedule not to exceed 12 months.

comment – 12 month implementation schedule may be difficult to meet due to unbudgeted expenses associated with additional capital BMPs.

Melanie May
Lakehaven Utility District