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Jim LaSpina  
Department of Ecology  
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Dear Mr. La Spina;

Thank you for allowing me to comment on the Industrial Stormwater General Permit. I appreciate that it takes a lot of time and hard work to revise a permit such as this. My own involvement with industrial stormwater is in assessing whether industrial facilities have required coverage and whether they are in compliance. My experience shows me that many facilities are not covered, though they should be, and some are even unaware of this requirement. I hope that you will address this oversight, so that all companies can operate from a “level playing field” and each do their own part to protect water quality.

Thank you again for this opportunity to comment. Specific comments related to the permit follow.

Sincerely,

Wendy Steffensen  
North Sound Baykeeper  
RE Sources for Sustainable Communities

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S1 C7: Relaxation of the requirement to obtain an ISGP for “land used for sludge management” does not appear warranted. The application rates of sewage sludge for this land will likely be far higher than that on farmland or garden. The application rate of the sewage sludge, along with soil type, should be the key factors in making the determination of whether land used for sludge management should be excluded from the requirement to have an ISGP.

S1 C9: While it may be difficult to regulate stormwater pollution from inactive mining, oil and gas operations, and inactive landfills, this does not mean that stormwater pollution from these sites is inconsequential. Please address how these sites will be assessed, if not through the ISGP.

S1 G3: Please clarify. If an operator of an industrial facility does not obtain required coverage under the ISGP, what are the responsibilities of the owner of the land?

S3 A3a: The most recent edition of the Stormwater Management Manual (SWMM) for Western Washington should be used, regardless of when the permit facility received coverage or whether there has been an exceedance of a benchmark. My own research shows that many facilities who are covered under the ISGP have not been sampling, thus there are no exceedances of benchmarks! (In order to make this change, the use of the 2005 SWMM needs to be spelled out throughout the text) Potential exceptions to the use of the 2005 SWMM should be made on a case by case basis, where capital investments have been made under the 2001 SWMM and there are no exceedances of benchmarks.

S3 A4e: Please clarify that the public can request the SWPP from the Department of Ecology, as well.

S3 A4e iii: Only one method was provided.

S3 A9: Ecology will rarely know if the SWPP does not meet minimum requirements. What will be Ecology's procedure to make an assessment of the SWPP?

S4 A3: If possible, it would be good for the sampler to note how long it had been raining prior to sampling, as well as the weather conditions in the previous few days. This information could be used in an overall characterization of stormwater characteristics.

S4 C2a,c: Stormwater components are variable and facilities change over time. The suspension of sampling should not be allowed. If eight consecutive samples show no exceedances of a benchmark or no detects on a 303d-listed water bodies, suspension of sampling should not be allowed. At least two samples per year should be required, under these circumstances.

S5 A4 Table 2: While it is understood that it is difficult to specify water quality standards for specific water bodies, especially those that are freshwater, water quality standards must be acknowledged and included in these regulations. The marine water quality standard for copper are 3.1 ug/L (chronic) and 4.8 ug/L (acute), whereas the benchmark value for copper is larger at 11.9 ug/L. Similarly the marine water quality standard for zinc is 81 ug/L (chronic) and 90.0 ug/L (acute), and the benchmark value is higher at 109 ug/L. By allowing the benchmark and action levels to be higher than the water quality standards, Ecology is either authorizing de facto mixing zones or a violation of water quality standards. Benchmark values should be set in line with water quality standards, wherever possible.

S5 B Table 3 Footnote e: Please clarify unit of time for the deicing chemicals.

S5 D2b: This water should be non-chlorinated. Please specify.

S5 D2g: Discharges associated with dewatering also should not contribute to turbidity. Thus, sediments, in addition to solvents, should not be discharged as part of dewatering activities.

S6 C1b: Please clarify. How does Ecology determine what should be sampled for in 303(d) listed water bodies?

S6 G6: Please clarify. In a situation such as listed in (G), what does the permittee do with their stormwater/ what procedure should be used to address stormwater?

S9 A4: Please add the requirement for a dry weather inspection report to be completed and sent to Ecology in the third quarter. In the absence of this, this requirement will likely be overlooked or forgotten.