



Lionel Klikoff
Department of Ecology
PO Box 47600
Olympia WA 98504-7600

January 10, 2007

Dear Mr. Klikoff:

I am writing to provide comments for the Draft Industrial Stormwater General Permit. I would like to request consideration by the Dept. of Ecology for options at facilities that do not discharge on a regular basis and potentially have no discharge.

Cedar Grove Composting operates a composting facility in Maple Valley Washington on approximately 30 acres. All stormwater runoff flows through the facility drainage system and is collected in three holding ponds. A majority of the runoff is recycled for feedstock hydration in relevant phases of the process. Any that cannot be recycled will be discharged to the sanitary sewer that is permitted by the King County Industrial Waste Division.

With the stormwater holding capacity in the three ponds, the ability to recycle the liquids in the process, and the ability to discharge stormwater to the sanitary sewer, the facility is able to prevent the discharge of stormwater in all but the most severe series of rainfall events. If, in the unusual event the design capacity of the stormwater system were exceeded in one of these events, stormwater would flow from Pond 2, through a 24-inch pipe that discharges to a forested upland area and infiltrates the soil.

In conclusion, Cedar Grove Composting considers the continual coverage provided under the Industrial Stormwater Permit essential and would allow the plant to properly and effectively regulate the potential rare occurrence of stormwater discharge off the facility site. Please address the requirement while reviewing the draft permit.

Thank you for this opportunity to comment on the Draft Industrial Stormwater General Permit.

Sincerely,

Leslie Credginton

Leslie Credginton
Cedar Grove Composting