

Via e-mail industrialstormwatercomments@ecy.gov

Lionel Klikoff
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

January 10, 2007

Re: North Sound Baykeeper Comments on Draft Industrial Stormwater General Permit

Dear Mr. Klikoff:

As the North Sound Baykeeper with RE Sources for Sustainable Communities, I have been working with the industrial stormwater general permit (ISGP) for several years, for the purpose of enforcing its provisions. I have found that the present permit is inadequate. Along with the Puget Soundkeeper Alliance (PSA), I find that this revised permit does not correct problems with the previous permit. In addition, this permit represents a giant step backward for water quality protection. There are no numeric effluent limitations for discharges to 303-d listed water bodies, as there should be, and the threshold levels set for pollutants are excessive! Please incorporate all of PSA's comments by reference to my own. In addition, I have the following brief comments:

S1: PERMIT COVERAGE.

While technically the permit outlines to which facilities the permit applies, it does not practically assist potential permittees or the public in determining or making clear which facilities need coverage.

The permit states that it applies to "discharge" of stormwater to a "surface water body". An explanation of discharge and surface water body should be included so that it is clear to potential permittees that this can mean the simple passage of rainwater across their paved industrial site into a storm ditch.

In my work as the North Sound Baykeeper, I have found that many facility managers do not know about the ISGP requirement. Ecology has been remiss in educating facilities in the need for an ISGP. While this permit cannot remedy that situation, Ecology needs to address this lack in its outreach efforts.

S1E: DISCHARGE TO GROUND

The permit as written, does not apply to facilities that discharge to ground, unless they are significant contributors to pollution. While this provision is fine on its face, there is no way for the public or Ecology, without an inspection, to determine whether a facility discharges to ground or not. I believe that all facilities listed in Table 1, should be covered by a certificate of no exposure, the ISGP, or a certificate of "drains to ground". Without this last category, there is no ready way to determine which facilities should be covered or not.

S1F: NO EXPOSURE

It is not clear whether the no exposure certificate questionnaire present now posted on Ecology's website will be revised or not, according to the language in the revised permit. It is also not clear how "reasonable potential" to exceed water quality standards will be determined. These items need to be clarified in the permit.

Thank you for your time and attention to improving this draft permit. I look forward to reviewing the final version.

Wendy Steffensen
North Sound Baykeeper
RE Sources for Sustainable Communities.