
From: Beth Hodgson [mailto:beth@springenvironmental.com]
Posted At: Thursday, January 10, 2008 2:47 PM
Posted To: Industrial Stormwater Comments
Conversation: 2007 Draft ISWGP - Comments from Spring Environmental
Subject: 2007 Draft ISWGP - Comments from Spring Environmental

Good afternoon Lionel,

Thank you for collaborating with Nancy Winters and providing the Stormwater presentation at the Spokane public hearing on Tuesday January 8, 2008. Please accept and consider the following comments before issuing the final document, currently planned for April of 2007.

Substantive Comments

- 1) **Corrective Action for Level 3 Response** (Condition S8.A.c) – While I recognize that the intent of this condition and the previous one is to ensure that the facilities previously covered under the 2002 ISWGP would not unreasonably delay corrective action already indicated by sampling results, the change in triggers could negatively impact facilities who have already initiated Level 3 response measures. If a facility initiated Level 3 response measures in the summer of 2007 and is currently instituting them, perhaps under an agreement with Ecology, the scope of their project would expand upon implementation of this proposed permit from one analyte (e.g. zinc) to a minimum of 5 which may change the technology. Funds may have been committed for consulting and equipment.

I would recommend that facilities currently addressing a Level 3 response measure with Ecology should ensure that the responses would be completed by the fall of 2009, or the facility would be in Step B. In effect Condition S8.A.b or c would be added such that “Any permittee who is in a Level 3 Response with a corrective timeline to be completed within 18 months of permit issuance shall complete the proposed action. The permittee shall submit a DMR and complete Forms 3 and 4 reports. Failure to meet the 18-month timeline and effectively implement the response measures will cause the facility to progress to Step B.”

General Comments

- 1) **Standard Industrial Classification Code** (Condition A1.A.2) – I was surprised to see SIC codes in use in the new permit rather than converting to NAICS codes has been doing, or even including a cross reference between the 2 systems.
- 2) **Ecology Provided SWPPP Training** (Condition S3.B.3.a.v.E) – I hope that Ecology provides a large quantity of training programs addressing

both topography and dates, at little to no cost, within 1-year after the date this permit is issued. All three of these parameters will impact the small businesses who my firm serves in Eastern Washington.

- 3) **Sampling Schedules** (Condition S7.Table 7) – I understand that Ecology is looking to simplify the confusion of multiple sampling schedules. While I don't think the number of samples required per wet season will be confusing, the dates will be. I have not researched the basis of the dates in your FACT Sheets, but perhaps simply making the wet season the longer of the two options, Sept 1 – April 30 would help facilities on both sides of the states. The impact simplifies planning while limiting based on the proposal, by one month, the period that facilities on the West side can conduct their dry season monitoring.

I apologize if my comments are too concise as I have a couple of deadlines this week, but feel free to contact me if you require additional information. Thank you for your attention to this matter.

Sincerely,
Beth

Beth Fifield Hodgson, PE
Spring Environmental, Inc.
Spokane, WA 99201
TEL: (509) 328-7500
FAX: (509) 328-7501
www.springenvironmental.com