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**From:** Tamara Thomas [mailto:tnthomas@terre-source.com]

**Posted At:** Wednesday, January 09, 2008 12:25 PM

**Posted To:** Industrial Stormwater Comments

**Conversation:** Comments on the Second Draft of General Industrial Storm Water Permit

**Subject:** Comments on the Second Draft of General Industrial Storm Water Permit

Dear Sirs:

As a professional in the environmental and solid waste industries, I encounter compliance issues primarily for composting and recycling facilities. Following the presentation of issues at the hearing staged in Mount Vernon this week and review of the revised permit documents, I respectfully submit the following comments that reflect my concern about a few issues apparent in this permit:

1. Section S4(C)(2) : The existing permit allows for Consistent Attainment of specific parameters following 8 sampling events (or seasons) of compliance with the benchmarks. Per discussion at the hearing, and the statement at the beginning of this section “After the effective date of this permit...” it was announced that facilities currently under Consistent Attainment for those parameters that will not change will now – due only to the issuance of this new permit rather than to any process change or increased likelihood of exceedance of the benchmarks – need to re-implement testing for those parameters. This appears to be an un-necessary and arbitrary requirement that will not assist in improving the water quality of the waters of Washington State. The facilities I work with do not mind incurring costs to improve their environmental impact. This implementation, however, incurs analytical costs by these facilities while it provides no benefit to the environment. I recommend that the parameters of Consistent Attainment that have been met by covered facilities where the benchmarks have not changed should be honored in the new permit. I, further, recommend that for the parameters whose benchmarks have been lowered, the facility should be given the opportunity to show that their level of Consistent Attainment met those new benchmarks, in order to maintain that status.
2. Section S3(B)(3)(a)(v)(E) Employee(s) of the facility must receive “one Ecology approved industrial storm water training session for this permit within one year of obtaining coverage under this permit.” I was unable to find on Ecology’s website a list of such approved training. I suggest that some assurance that a list of such trainings with ample frequency and geographical distribution will be available at the time of the issuance of this permit should be provided with this requirement.
3. General: I applaud the change in sampling frequency and reliance on median of the wet season discharges. This change implements a common-sense approach to looking at the impact to the water body rather than to the variability of a single sample result.

4. General: I also applaud the addition of copper to the analytical list as it appears that element is impacting water quality in this state. I am a bit concerned, however, at the immediate institution of the benchmark value for compliance rather than at least one year of data collection alone to determine the impact to waters of the state from industrial discharges versus or along with non-point sources. At a minimum, I expect Ecology will be implementing a general education about potential impacts of copper roofs, gutters, etc.

5. General: It appears that this permit revision is moving in the direction of basing compliance on the benchmark values rather than BMP compliance. This may be simpler for evaluation, but may not provide the most efficient improvement in water quality. Among other potential problems, a site which discharges very low volumes of water may need to spend a great deal of money to reduce its benchmark values, while a site that discharges much larger volumes could impact a surface water body much more with a single exceedance.

Thank you for the opportunity to comment on this revised permit.

Sincerely,

Tamara N. Thomas, P.E.

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