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Mr. Jeff Killelea
Department of Ecology
PO Box 47600 (industrialstormwatercomments@ecy.wa.gov)
Olympia, WA 98504-7600

Bellevue Staff Comments on the Proposed 2009 NPDES Industrial Stormwater General Permit¹

Dear Mr. Killelea:

Thank you for the opportunity to provide comments on the proposed revisions to the NPDES Industrial Stormwater General Permit (Permit). Bellevue's comments are attached.

Our staff comments are primarily directed at Section 1 Permit conditions which appear to require municipalities to obtain NPDES Industrial Stormwater Permit coverage for municipally-owned vehicle maintenance and storage area facilities that are already covered under and conditioned in the NPDES Municipal Stormwater Permits. If this is correct, then this would be contrary to an earlier Ecology investigation of this issue and determination that *"municipally owned/operated road maintenance facilities and heavy equipment maintenance and storage areas will be covered under the municipal stormwater permits and NOT under the industrial stormwater general permit."*² We request that this determination (for municipal facilities to be covered under the municipal stormwater permits) remain in effect and that the proposed Permit S1 language (S1.D.5) be revised to clarify and support this determination.

Additionally, our comments address the proposed benchmark for copper, which appears to be problematic and technically flawed (and, if left as is, could set precedent for future questionable benchmark setting).

If you have any questions about our comments, please contact Phyllis Varner at (425) 452-7683 or pvarner@bellevuewa.gov.

Sincerely,

Denny Vidmar
Utilities Director
cc: Bill Moore

¹ INDUSTRIAL STORMWATER GENERAL PERMIT A National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated With Industrial Activities

² April 19, 2007 email from Bill Moore, Ecology. Phase I and II NPDES Municipal Stormwater Permits require Permittees to develop and implement a Stormwater Pollution Prevention Plan for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the Permittee.