



PUBLIC WORKS

July 13, 2009

Mr. Jeff Killelea
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Mr. Killelea:

Thank you for the opportunity to comment on the draft Industrial Stormwater General Permit. As a participant on the committee advising Ecology on the development of the permit, I am well aware of the time and effort all involved committed to this document, and I commend Ecology for all of their hard work and patience during the discussions leading to this draft.

The City of Everett submits the attached comments on the draft permit. I look forward to seeing the Response to Comments, and a new draft as appropriate.

Please contact me at 425-257-8889 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Heather Kibbey". The signature is fluid and cursive, with a large loop at the end of the last name.

Heather Kibbey
Surface Water Manager

The following comments include a general discussion about the copper benchmarks, followed by permit specific comments, then fact sheet specific comments.

General Comments re the Industrial Stormwater General Permit

The copper benchmarks in the draft permit are problematic for a number of reasons.

The benchmark in the current permit is 63.6 ug/l and comes from the EPA 2006 Multi-sector General Permit. The benchmark has been lowered to 14 ug/l for Western Washington and 32 ug/l for Eastern Washington, based on the hardness dependent water quality standards and an arbitrary and very conservative dilution consideration of a factor of 5. The lowered benchmark replaces the higher earlier benchmark and also the even higher earlier action level, and serves to trigger escalating response levels. It is applied just for a limited number of industries, and imposes an excessive burden on them that will bear little or no environmental benefit.

The stormwater characterization by industrial group on pages 4 through 34 is rather telling for copper. Of 40 sectors described, 28 sectors had copper monitoring. The characterization shows what percentages of each of those exceeded the benchmarks and the action levels, but the analysis was for exceedences of the current permit's values and not the proposed permit. 25 out of the 28 industrial groups that had monitoring for copper had median concentrations higher than the Western Washington proposed 14 ug/l benchmark!

Ecology's evaluation of pollutant loading estimates for surface runoff and roadways determined that the geometric mean for copper in highway runoff is 18.7 ug/l, which is higher than the proposed benchmark.

The Fact Sheet acknowledges that in order to meet the proposed copper benchmarks, many permittees will be required to install active stormwater treatment systems, and refers to the Boatyard Stormwater Treatment Study. Ecology's boatyard general permit development has identified stormwater treatment costs for copper of \$255,000 per acre.

The purpose of drawing this information out is to illustrate the great difficulty and expense the copper benchmark represents. At the moment the permit only applies it to a few industry sectors, but it could be applied to more, and it could set a precedent for application in other permits as well. Consequently, there could be very high costs both to individual industries and to the public as well. Are such costs justifiable? What will the impacts of such costs be? What effect on the economy will this have? What benefits will result?

Some groups are expected to object to allowing even a dilution factor of 5 in deriving permit limits for a general permit. In terms of environmental significance, dilution does occur, and limits the duration of exposure to organisms in the water. Water quality criteria are not based on instantaneous exposures, but include frequency and duration of exposure components. To implement such criteria as end of pipe limits, or as limits based on just a very small amount of dilution that happens rapidly, does not implement the criteria consistent with the assumptions behind the criteria. Dilution varies considerably depending on the size of the discharge and the volume of water or flow in the receiving water. The general permit did not try to accommodate the range of dilutions that occur in the real world, and consequently is overly conservative.

The reality also is that if every one of the industrial stormwater general permit holders were to be evaluated for individual NPDES permits and limits, the limits would be based on mixing zones and most permittees would receive much greater dilution benefit. The mixing zone regulations

even allow that mixing zones for stormwater may be larger than the sizes described in the regulation for other mixing zones.

The metals water quality standards also allow for adjustments to the standards based on a water effects ratio. The procedure is recognized and specifically included in our water quality standards. Ecology should use the water effects ratio to adjust the copper benchmarks now, rather than imposing such requirements on individual permittees.

It is interesting to see the potential for very expensive stormwater treatment for copper and then to ask what environmental gain will there be? Ecology acknowledges that in the state of Washington, very few water bodies are 303(d)-listed for copper, zinc or lead. (Fact Sheet at 75). The state's 303(d) list of impaired waters shows only 8 streams listed for copper, and all are small creeks (one downstream from an abandoned copper mine). There are no listings for larger streams and rivers, or for marine waters. The most sensible action is to remove the copper benchmarks from the permit and only address copper for individual dischargers through requirements in Section S6 (Discharges to 303(d)-listed or TMDL waters) when needed.

Comments re Draft Industrial Stormwater General Permit

Pg 23. Change Sec. S4.B.6.b and 6.c and add new 6.d as follows:

- b. For pH, the eight consecutive quarterly samples shall be within the range of 6.0 to 9.0
- c. For discharges to 303(d)-listed water bodies, eight consecutive quarterly samples fail to detect the presence of the listed parameter, or detect the listed parameter in some of the samples, but at levels below the applicable 303(d) criteria values.
- d. For discharge to 303(d) listed water bodies listed for pH, eight consecutive quarterly samples are within the pH range specified in Section S6.C Table 5.

Reason for changes. For 6.b, change reflects attainment of benchmark values, which present language, does not. For 6.c, change essentially allows mixture of non-detects and detections below applicable criteria values to both count towards consistent attainment of water quality criteria values. For 6.d, change addresses demonstration of consistent attainment for pH for 303(d) listed waters. Note, these comments will also propose an adjustment to the referenced Section S6.C Table 5 for pH to agree with page 51 of the Fact Sheet.

Pg. 23. Sec. S4.C change to add the following sentence:

The analytical method for cyanide shall be the weak acid dissociable method in SM 4500-CN I.

Reason for change. This method is specified for cyanide in our water quality standards (see footnote “ee” in Table 240(3) in WAC 173-201A-240(3))

Pg 25. Sec S5.B Table 3 either change the benchmark value for lead from 81.6 to Western WA: 310 and Eastern WA: 640 as per Herrera study or drop the benchmark

Reason for change. The Fact Sheet at 78 says that 81.6 ug/l was retained due to anti-backsliding concerns. It is not appropriate to invoke anti-backsliding in this case for several reasons. The 81.6 ug/l benchmark was never a permit limit, and anti-backsliding pertains to permit limits. This is a general permit, and the Herrera study showed that a number of different industry groups had lead data that exceeded 81.6 ug/l, so it has not been consistently attained. The current permit also has a combination of benchmark values and higher action level values, whereas the new permit is using only benchmark values, which significantly changes the use of the 81.6 ug/l benchmark for lead. In the new permit, the 81.6 ug/l benchmark can drive even Level 2 and Level 3 actions whereas in the present permit it could not.

The Herrera study used an ultra conservative and arbitrary dilution factor of 5. The fact that even then, lead benchmarks were calculated significantly higher than the present benchmark strongly suggests that lead probably isn't even an issue that needs benchmarks and monitoring for.

Pg 25. Sec S5.B Table 3. The copper benchmarks are impossibly low, especially for Western Washington. The benchmark should either be removed or adjusted using a number of currently available tools.

The copper benchmark for Western Washington is set at 14 ug/l. It is applied to a limited number of industries and is lower than the 18.7 ug/l geometric mean for copper runoff from highways.¹ A limited number of industries are being asked to perform better than society itself, while Ecology's Fact Sheet demonstrates that 25 out of 28 industry categories that have monitored for copper consistently exceed the 14 ug/l benchmark.² Rather than driving some permittees to very costly treatment for copper, Ecology needs to come up with a different way to address stormwater copper concerns through societal source controls when feasible.

Argument for removing the copper benchmark.

The stringency of the proposed copper benchmarks raises the issue of where are there known water quality problems with copper? The state's 303(d) list of impaired waters shows only 8 streams listed for copper, and all are small creeks (one downstream from an abandoned copper mine). There are no listings for larger streams and rivers, or for marine waters. It makes more sense to remove the copper benchmarks from the permit and only address copper for individual dischargers through requirements in Section S6 (Discharges to 303(d)-listed or TMDL waters). Societal source controls, if necessary, are best developed outside of this general permit.

Argument for adjusting the copper benchmark.

Ecology should accommodate a range of real world dilutions and also adjust the acute copper criteria based on an appropriate water effects ratio or the EPA's biotic ligand model to develop a more realistic set of copper benchmarks in the general permit. During the advisory committee process, a more realistic modeling tool was developed by Kennedy-Jenks on behalf of Boeing and made available to Ecology. Ecology should use it. Not surprisingly, the tool demonstrated that benchmarks could be higher for discharges to large flowing waters because of greater dilution. The science on copper has advanced, and adjustments to the benchmarks can and should also be made based on use of the water effects ratio, or the biotic ligand model (which is a lower cost way of making an adjustment comparable to the water effects ratio). Ecology should use these tools to develop a range of copper benchmarks and then appropriately tailor the copper benchmarks to individual situations and permittees.

Pg 25. Sec S5.B Table 3 change Cyanide from "Total" to "WAD" and the analytical method from EPA 335.4 to SM 4500-CN I.

Reason for change. This method is specified for cyanide in our water quality standards (see footnote "ee" in Table 240(3) in WAC 173-201A-240(3))

¹ See Table 6 in Department of Ecology, 2008. *Control of Toxic Chemicals in Puget Sound Phase 2: Pollutant Loading Estimates for Surface Runoff and Roadways*.

² Although the fact sheet presents a calculation showing percentage of time the industries bet the current benchmark of 63.6 and action level of 149 ug/l, it also presents the median measured concentrations of copper for each of 28 industries that monitored for copper. 25 of those had median values greater than 14 ug/l, which means that more than 50% of the time they could not meet the proposed benchmark.

Pg 25. Sec S5.B Table 3 change ammonia benchmark value to 11.4 mg/l in Western WA and 2.1 mg/l in Eastern WA, and/or say that the benchmark value will or may be determined by Ecology on a stream specific basis using pH data and the table on pages 52-53 in the Fact Sheet.

Reason for change. The Fact Sheet says that the 2.1 mg/l water quality-based benchmark is based on a receiving water pH of 8.5 and a temperature of 21°C. The acute ammonia criteria for freshwater are not dependent on temperature. A review of pH data for western Washington shows that a pH of 7.6 is more appropriate, resulting in a benchmark of 11.4 mg/l. For eastern Washington rivers, and the Columbia River, a pH of 8.5 is appropriate. Another alternative is to have Ecology determine the ammonia benchmarks on a waterbody and permittee specific basis, using pH data for the receiving water and the table on pages 52-53 in the Fact Sheet. This is not a difficult or time consuming thing to do.

Pg 28, Sec S5.D.2.c, Change to read:

- c. Discharges of potable water including water line flushing, provided that water line flushing of hyper-chlorinated water must be de-chlorinated prior to discharge.

Reason for change: It is important to de-chlorinate hyper-chlorinated water used in water line cleaning when flushing it out. It's unrealistic to require de-chlorinating of potable water before discharging.

Pg 31, Table 5, change the pH freshwater effluent limitations to match the pH discussion on pages 51-52 in the fact sheet.

Reason for change: Consistency and reasonable approach.

Pg 31, Table 5, change the fresh water bacteria effluent limit from just 100, to 100, 200, or 400 depending on the receiving water's use classification.

Reason for change: Different bacteria standards apply in different waters.

Pg 31, Table 5, delete pentachlorophenol and annotate marine column as not applicable for phosphorus, ammonia, copper, lead and zinc.

Reason for change: There are no 303(d)-listed marine waters for the parameters cited, and there are no 303(d) listings for pentachlorophenol in either fresh water or marine water.

Pg 32, Sec S7.A.2 requires that after certain dates visual inspections must be conducted by a certified industrial stormwater manager, or other options. The permit language should explain how one becomes certified or refer to a place in the fact sheet where that information can be elaborated on.

Pg 34, Sec S8.B.4.b; pg 36, Sec S8.C.4.b and pg 37, Sec S8.D.1.b provide flexible provisions to waive requirements for further structural source control BMPs or treatment BMPs.

Comment: The provisions are appropriate.

Pg 35, Sec S8.B.4.c; pg 36, Sec S8.C.4.c provide that in order to request a time extension or waiver (under S8.B.4.b and S8.C.4.b) the permittee shall submit an Application for Coverage

form to Ecology in accordance with Condition S2.B, at least 90 days prior to the applicable Corrective Action Deadline, requesting “Modification of Coverage”.

Comment: While the time condition of the request makes sense when requesting a time extension, it makes no sense for when requesting to waive requirements under S8.B.4.b or S8.C.4.b. Subsection “c” in each of these sections should be broken up into two separate subsections “c” and “d” as follows:

~~S8.B.4.c.~~ To request a time extension ~~or waiver~~, a permittee shall submit an *Application for Coverage* form to Ecology in accordance with Condition S2.B, at least 90 days prior to the applicable Corrective Action Deadline, requesting “Modification of Coverage”. Within 60 days of receipt of a complete *Modification of Coverage* request, Ecology will approve or deny the request.

S8.B.4.d. To request that Ecology waive the requirement for *Structural Source Control BMPs* a permittee shall submit an *Application for Coverage* form to Ecology in accordance with Condition S2.B requesting “Modification of Coverage”. Within 60 days of receipt of a complete *Modification of Coverage* request, Ecology will approve or deny the request.

~~S8.C.4.c.~~ To request a time extension ~~or waiver~~, a permittee shall submit an *Application for Coverage* form to Ecology in accordance with Condition S2.B, at least 90 days prior to the applicable Corrective Action Deadline, requesting “Modification of Coverage”. Within 60 days of receipt of a complete *Modification of Coverage* request, Ecology will approve or deny the request.

S8.C.4.d. To request that Ecology waive the requirement for *Treatment BMPs* a permittee shall submit an *Application for Coverage* form to Ecology in accordance with Condition S2.B requesting “Modification of Coverage”. Within 60 days of receipt of a complete *Modification of Coverage* request, Ecology will approve or deny the request.

Reason for change: The application for Ecology to waive the requirement for structural source control or treatment BMPs should be evaluated on its merit, and not subject to the time constraints applicable to a time extension request. The recognition of the need or ability to request a waiver might not occur to a permittee in the described time frame, but that would not have any bearing on the merit of the request.

Pg 37, Sec S8.D.1.d. the first sentence needs rewording.

Pg 39, Sec S9, add the following new subsections 7, and 8.

7. The Permittee may identify on the DMR if any data might not be representative and why. Non-representative data should not count towards corrective action triggers.
8. The Permittee may also present upstream and downstream receiving water turbidity data to compare with the stormwater data and the applicable turbidity standards. If the downstream value is less than the increase allowed in the standards, compliance is demonstrated. The downstream monitoring point in a stream should be 100 feet if the streamflow is less than 10 cfs, 200 feet if the streamflow is between 10 cfs and 100

cfs, and 300 feet if the streamflow is greater than 100 cfs. In lakes, estuaries, or marine waters the monitoring point shall be at a radius of 150 feet from the discharge.

Reasons:

For the representative data concern, sometimes factors that have nothing to do with the management of the stormwater can lead to an exceedance of a benchmark. One example is tree pollen accumulating in a detention pond causing elevated turbidity. Another example is birds in a detention pond causing elevated bacteria.

For turbidity, the water quality standard itself is not a fixed number but instead is an allowance above background and that allowance also varies with stream use classification. The compliance distances provided in the proposed subsection 8 are the same as are provided in regulation for temporary mixing during and immediately after necessary in-water construction activities, as a reasonable precedent.

Comments re Fact Sheet for Draft Industrial Stormwater General Permit

Because this is a general permit and not an individual permit, it is important that Ecology make revisions to the fact sheet following public comment, even though that is not the normal practice with individual permits.

Pg 47, third line. The last sentence “This period is approximately October 1.” is incomplete.

Pp 50-51 describes 303(d) listed parameters that would not require water quality-based effluent limitations for stormwater permits.

We agree with the rationale for not triggering effluent limits for the examples provided.

Pg 51 provides the technical basis for fecal coliform limits for facilities discharging to 303(d) listed waters for bacteria. The limit of 100 colonies/100 mL fecal coliform bacteria is equal to the extraordinary primary contact recreation standard.

That should only apply to waters where that is the designated recreation use. There are also standards for primary contact recreation and for secondary contact recreation, and where waters have either of those designated recreation uses, the standards should be related. Hence, for primary contact recreation waters, the limit would be 200 colonies/100 mL, and for secondary contact recreation waters it would be 400 colonies/100 mL.

Pg 51 describes pH limits for outfalls to freshwater on the 303(d) list for pH.

The pH limits described appropriately consider and adjust for whether the 303(d) listing was for high or low pH.

Note that the pH limits in Table 5 on page 31 of the permit need to be corrected to reflect the description on pg 51 of the fact sheet.

Pg 52 discusses basis for limits for outfalls to marine waters on the 303(d) list for pH.

Should note that there are no marine waters listed for pH, so maybe delete discussion.

Pg 52 discussions for Total Copper and Total Zinc 303(d) listed waterbodies.

Each describes waterbodies on the 303(d) list for Total Copper or Total Zinc. The water quality standards for metals are for dissolved metals, and 303(d) listings would only be for dissolved copper or dissolved zinc.

The second sentence in the copper discussion should be changed to read:

This effluent limitation will be for total copper, ~~derived as the dissolved copper criteria at the time of permit coverage~~ based upon receiving water type (freshwater or marine) and hardness, the acute criteria, and a ~~total/dissolved~~ dissolved/total translator factor, in accordance WAC 173-201A-240(3), applied end-of-pipe as a “daily maximum” limit.

The second sentence in the zinc discussion should be changed to read:

This effluent limitation will be ~~for total zinc, derived and assigned at the time of permit coverage~~ based upon receiving water type (freshwater or marine) and hardness, ~~the acute criteria,~~ and a ~~total/dissolved~~ dissolved/total translator factor, in accordance WAC 173-201A-240(3), applied end-of-pipe as a “daily maximum” limit.

Reason: The standards are based on dissolved metals, while limits are based on total metals. For stormwater, the acute criteria are appropriate, not other criteria.

Pp 52-53. There is no discussion of turbidity. There should be. See turbidity comments in the permit comment section, for Section S9.

Pg 53, discussion about facilities with outfalls to waterbodies on the 303(d) list for Pentachlorophenol.

The section should be deleted.

Reason: there are no waterbodies on the 303(d) list for pentachlorophenol.

Pg 53. Describes how facilities with outfalls to waterbodies on the 303(d) list for sediment quality excursions are subject to a WQBEL of 30 mg/L TSS.

This may make sense in some situations, but generally does not make sense. There may be legacy contaminants in sediments that have nothing to do with a stormwater discharge and there would therefore be no linkage at all to require a TSS limit. The effect of the limit described here would be to possibly reduce the rate at which the contaminated sediments might be contained or buried, which would be counter-productive.

Ecology should be required to determine some possible nexus between the stormwater discharger and the particular parameters exceeding the sediment quality standards before imposing a TSS limit.

Pg 59, second to last paragraph, third line.

It discusses the Phase I or Phase I municipal stormwater permit.

It should say “...Phase I or Phase II...”

Pg 62 notes that “If contamination of stormwater is unavoidable, the SWPPP will quantify the environmental risk and determine if treatment of the stormwater is necessary to prevent a violation of water quality standards and loss of beneficial uses in the waters of the state.”

Most permittees are going to have no idea how to do this. Ecology should provide technical assistance in this task because it should not and does not always require complex studies and consultant analysis. The assistance is needed because this requirement will normally be well outside the range of expertise of the individual permittees.

Pg 68, first paragraph, last sentence.

Change “...will not quality” To “...will not qualify...”

Pg 70, discussion of Special Conditions S4.B.6.b

The section identifies conditions for which a permittee may suspend sampling for one or more parameters based on consistent attainment of benchmark values, and then for pH it identifies much more restrictive values than the pH benchmarks. Consistent attainment should be when within the range of 6.0 to 9.0, or if the water is listed for pH on the 303(d) list, consistent attainment should be when within the range of pH values shown in the fact sheet for pH on page 51.

Note that corrections to Permit Condition S4.B.6.b are also required.

Pg 70, discussion of Special Conditions S4.B.6.c.

See changes recommended for permit section S4.B.6.c and for a new permit section S4.B.6.d above.

Pg 73, discussion about basis for turbidity benchmark value. The discussion should be increased to better allow for comparison to the turbidity standard. Suggested additional wording follows:

Because the turbidity water quality standards also include an allowance of not more than a certain level of increase, or not more than a certain percentage increase above upstream turbidity, comparisons between upstream and downstream samples may be used to demonstrate compliance with the standards, and count as compliance with the benchmark. Stream samples must be obtained the same day as the stormwater sample.

See related comment about turbidity in Section S9 of the permit above.

Pg 78, discussion about the total copper benchmark value. The discussion notes that the benchmark was developed by the Herrera 2009 report, assuming a dilution factor of 5. The discussion notes that many permittees will be required to install active stormwater treatment systems in order to meet the proposed copper benchmarks. It cites to the Boatyard general permit as a basis for the treatment requirements.

Ecology should either eliminate the copper benchmark from the permit, or use better tools for dilution and refinement of the copper criteria to develop more realistic copper benchmarks. See other discussions regarding copper in these comments.

Pg. 78, discussion about the total lead benchmark value. Ecology shows how the Herrera 2009 study supported benchmarks for lead of 310 ug/L in western Washington and 640 ug/L in eastern Washington. Ecology then says that to avoid conflict with the anti-backsliding provisions of the CWA, they decided to retain the previous permit benchmark of 81.6 ug/L

Ecology should either eliminate the lead benchmark from the permit, or use the Herrera 2009 values. The anti-backsliding provisions are not applicable here.

The state's 303(d) list identifies only 7 waterbodies as impaired for lead (4 of which are affected by mining). Lead could be deleted as a benchmark concern and then addressed where necessary under the 303(d) listed water bodies provision in the permit.

The anti-backsliding provisions pertain to permit limits, not benchmarks, and are not applicable in this general permit. Furthermore, simply retaining the previous benchmark

has the effect of imposing more stringent requirements than the previous permit, since the new benchmarks can compel level 2, 3 or 4 responses, whereas in the current permit a higher action level of 159 ug/L is what compelled level 2 or 3 responses. The lead monitoring data described in pages 4 through 34 of the fact sheet show facilities could not consistently meet the 81.6 ug/L benchmark, but they also do much better when compared to the Herrera 2009 benchmarks. Table 40 on page 34 of the Fact Sheet identifies that total lead is a pollutant of low level of concern.

Pg 80, discussion about ammonia. The benchmark could be improved by use of the freshwater ammonia criteria table on page 52-53 of the fact sheet and representative pH values for eastern and western Washington rivers.

Note that the text says that the ammonia benchmark (of 2.1 mg/L) is based on a receiving water pH of 8.5 and a temperature of 21°C. The acute ammonia criteria are not a function of temperature. Using upper end pH values of 7.6 for Western Washington, and 8.5 for Eastern Washington and the Columbia River results in a western Washington benchmark of 11.4 and an eastern Washington benchmark of 2.1 mg/L. For marine waters where ammonia criteria are dependent on salinity, temperature and pH, a reasonable winter temperature of 10°C, salinity of 30 parts per thousand and pH of 8.4 could be used for a benchmark of 6.0 mg/L for ammonia.

Table 53 should be adjusted to use the default ammonia values of 2.1 mg/L – eastern Washington, 11.4 – western Washington and 6.0 mg/L – marine as default benchmarks.

It should also be suitable to allow a pH measurement of receiving freshwater, and then determine the acute ammonia criteria from the table on page 52-53 to determine the acute ammonia criteria, which if met, should also count as meeting the benchmark. Similarly, a receiving water temperature and pH measurement for marine waters could be used to determine the applicable ammonia criteria from the table below, which if met, should also count as meeting the benchmark.

TABLE VIII. TOTAL AMMONIA ACUTE CRITERIA FOR SALTWATER AQUATIC LIFE (cont.)								
Total Ammonia in mg-N/L at 30 g/kg Salinity								
pH	Temperature							
	0°C	5°C	10°C	15°C	20°C	25°C	30°C	35°C
7.0	312	208	148	102	71	48	33	23
7.2	196	135	94	64	44	31	21	15
7.4	125	85	58	40	27	19	13	9.4
7.6	79	54	37	25	21	12	8.5	6.0
7.8	50	33	23	16	11	7.9	5.4	3.7
8.0	31	21	15	10	7.3	5.0	3.5	2.5
8.2	20	14	9.6	6.7	4.6	3.3	2.3	1.7
8.4	12.7	8.7	6.0	4.2	2.9	2.1	1.6	1.1
8.6	8.1	5.6	4.0	2.7	2.0	1.4	1.1	0.81
8.8	5.2	3.5	2.5	1.8	1.3	1.0	0.75	0.58
9.0	3.3	2.3	1.7	1.2	0.94	0.71	0.56	0.46

Pp 84-85, table 57, which compares existing and draft analytical methods.

For Oil and Grease, delete the method for the 2007 column since no longer required.

For Ammonia, the 2002 Analytical Method was EPA 350.1

For Total Cyanide, change to WAD Cyanide and replace method EPA 335.3 with SM 4500-CN I as per our water quality standards. Also change the footnote for WAD Cyanide to “j” and add footnote “j” at the bottom as:

^j from WAC 173-201A-240(3) footnote ee