From: Heather Kibbey
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Conversation: Addition to Everett comments on draft Industrial Stormwater General Permit
Subject: Addition to Everett comments on draft Industrial Stormwater General Permit

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I would like to make an additional comment regarding S1.D.5. It appears that Ecology now wants to institute a policy of multiple stormwater permits issued to jurisdictions that are already covered under Phase 1 and 2 municipal stormwater permits. As you will recall, we went through a series of discussions on this topic after the Industrial permit was issued (and just prior to its appeal) in 2007, where the municipalities showed Ecology that industrial facilities owned or operated inside the boundaries of the jurisdiction were already covered under the municipal permits. Ecology agreed with this, and an email memo from Bill Moore affirmed this approach. The current draft industrial language now seems to be reversing that. We disagree with that approach. I have seen no evidence from the covered jurisdictions that shows that their industrial facilities currently covered under the municipal permits are causing harm that would be better regulated under the industrial permit. This also seems to contradict Ecology's position that they are short on staff, and cannot serve the industrial permittees they have now. This will not help the situation. It also contradicts Ecology's request for money saving measures via the permit modifications to the Phase 1 and 2 permits. Servicing permit requirements takes a lot of time, and having separate permits for each facility in a jurisdiction will cost much more than any other savings that were possibly gained by the permit modifications.

Also, if this provision remains in the industrial permit, won't it cause an immediate need for permit modifications for the Phase 1 and 2 jurisdictions? Is this not a time consuming and costly process that Ecology would rather avoid, since the current permit modifications were appealed today, thus leading to more cost and time spent at the PCHB?

The City of Everett asks that Phase 1 and 2 jurisdictions remain exempt from additional industrial permits.