

JUL 14 2009

WATER QUALITY PROGRAM

Dear Mr. Killalea:

I run a small vehicle recycling firm and I am very concerned that the new draft Washington State Industrial Stormwater General Permit will put my business and others small firms in our industry out of business. We strongly object to the draft Permit as now proposed.

The draft Permit is way too complex. I am trying to run a small business in a very difficult economy. You would need some super college degree to understand what this permit requires and how to comply with it. We have no one on staff with such a degree or knowledge. Where are we supposed to get this type of expertise from? This permit needs to be far simpler for small business instead of being so very difficult to understand and implement.

Why in the world would the Department require that our stormwater must be cleaner than the public drinking water in most areas of the state? How can the Department impose such a ridiculously low limit on copper in stormwater? The copper from our facilities together is miniscule as compared to the copper coming off the roads and highways where people drive cars and use their brakes. When they use their brakes, they release copper into the environment. Yet, the Department is proposing nothing to control that huge source of copper that is millions of times greater than the copper that comes from our facilities.

This permit will put us out of business but do nothing to reduce the amount of copper in our lakes and rivers because nearly all of it is coming off public roads and streets.

This permit prohibits my business from having a visible oil sheen but does nothing about the oil running off public streets and parking lots. Again, the oil from all of our vehicle recycling facilities combined is miniscule as compared to the oil going into storm drains from our public roads and from parking lots. Yet, you are proposing nothing to control that oil in stormwater.

This permit will kill most of the businesses in our industry, put people out of work and will cost the State of Washington well over \$50 million annually due to lost revenues from our industry and new costs to the state to replace the functions we now perform. Putting our industry out of business eliminates the re-use of the end-of-life vehicle waste stream. Reuse of a waste stream is the highest environmental priority set in state law for any waste stream – yet this permit will effectively eliminate the vehicle recycling industry. That makes no sense.

Who is going to handle this junk vehicle waste stream when we are gone? Illegal operations that drain anti-freeze into storm drains and CFC gases into the air, etc., in the back streets and alleys across the state to prepare junk cars for recycling. You'll never catch them but you'll find the messes they will leave all over the state.

Many suggestions have been made by the Independent Business Association regarding how to make this permit work far better for small businesses. Please carefully review their suggestions and put them in this permit.

The vehicle recycling industry is struggling to survive. Too many in our industry have already gone out of business mostly due to extremely costly government regulations. This draft permit could well be the straw that breaks the back of the entire industry in Washington State, if not re-written.

Thank you for considering our comments and making changes to the permit so our industry can continue to provide the highest management of the junk vehicle waste stream (re-use), continue to protect the environment by collecting and properly disposing of many substances from junk vehicles, continue to collect sales taxes for Washington State at no cost to the state, continue to pay business taxes to Washington State, continue to provide jobs for our workers, and continue to help keep the cost of auto repairs and vehicle insurance down through our sale of used vehicle parts.

Sincerely, **ED LEVESQUE**

*Ed Levesque*  
Owner

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