DEPARTMENT OF ECOLOGY

JUL 14 2009

WATER QUALITY PROGRAM

July 10, 2009

Jeff Killelea
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Killelea:

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

The owner of the recycling firm I work for is trying to operate a small business in a very difficult economy. The permit is very difficult to understand and needs to be far simpler for a small business to understand and implement.

This permit will put recycling businesses 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 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 will 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.

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.

Sincerely,

Carl Niebuhr
P.O. Box 147
Snohomish, WA 98291