

February 2, 2012

Municipal Permit Comments  
WA Department of Ecology  
Water Quality Program  
PO Box 47696  
Olympia, WA 98504-7696

Re: Draft Eastern Washington Phase II Municipal Stormwater 2013-2018 Permit and  
2012 Permit - Comments by WSU Pullman

Dear Department of Ecology:

Washington State University Pullman appreciates the opportunity to comment on the Draft Eastern Washington Phase II Municipal Stormwater 2013-2018 Permit. The following are WSU's comments.

1. It is requested that the existing permit be reissued for a longer period of time so that additional requirements on all permittees are delayed during these times of shrinking budgets and staff.
2. Page 5, S1.A, Line 5: "'... *bounded* ..." is misspelled.
3. Page 12, S2.B.2, Line 6: Additional time is required for cleanup after the fire, therefore revise this to state to "The discharge occurred during emergency firefighting *and cleanup* activities, or".
4. Page 12, S3.2, Line 36: S8.D and S8.E Monitoring not included in S8.
5. Page 41, S6.A.4, Line 28-29: Delete all references to a Stormwater Management Program Report (SWMPR) since the Stormwater Management Program (SWMP) accomplishes the same thing.
6. Page 42, S6.D.1.a, Line 35: Add "... shall be relabeled within 90 days *weather permitting*." This would be applicable during the winter months if there is a lot of snow or rain.
7. Page 43, S6.D.2.b, Line 31: Delete "SWMPR."
8. Page 43, S6.D.2.b, Line 32: "*Website*" is misspelled.

9. Page 45, S6.D.3.b, i., Line 5: Same comment as #3. Page 12, S2.B.2, Line 6 above. Revise to "*Discharges that occurred during emergency firefighting and cleanup activities.*"
10. Page 45, S6.D.3.b, i., Line 6-7: Revise to "Non-stormwater discharges authorized by another NPDES or state waste discharge permit *that meet state surface water quality regulations and local TMDL requirements.*"
11. Page 46, S6.D.3.b.iii, Line 11: Revise "... *ii and iii above* ..." to "... *i and ii above*..."
12. Page 48, S6.D.6.a, i, Line 36: Define "*major storm*" or keep the existing language.
13. Page 53, S9.A, Line 35: Revise annual reports to every 2 years since the EPA allows this in the federal register.
14. Page 66, Line 17-20: Retain "*long term basis*" and define what long term means.
15. Page 70, "*Permittee*," Line 14: Clarify that a permittee includes cities and counties.
16. Page 73, Line 3: Delete SWMPR based on comment above.
17. Appendix 4, Page 2, VI. 1: Revise "*S9.F.4*" to "*S9.F.2*".
18. Appendix 4, Page 2, VI. 3: Revise "*S6.D.1.a.iii*" to "*S6.D.1.a*".
19. Appendix 4, Page 2: Pagination is incorrect (only 6 pages, not 10).

The following are minor comments on the on the Eastern Washington Phase II Municipal Stormwater 2012-2013 Permit.

1. Appendix 4, Page 5, VI. 8: Revise "*S5.D.2.b*" to "*S6.D.2.b*".
2. Appendix 4, Page 6, VI. 15: S9 does not require attaching a summary of illicit discharges.

Thank you again for letting WSU comment on these draft permits. Please contact me if you have any questions.

Sincerely,



Gene Patterson  
Air and Water Quality Manager

cc: Dwight Hagihara