



City of Tacoma
Public Works Department

DEPARTMENT OF ECOLOGY
MAY 01 2009
WATER QUALITY PROGRAM

April 30, 2009

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

Subject: City of Tacoma Comment on Proposed Phase 1 Municipal Stormwater Permit Modifications

To Whom It May Concern,

We have reviewed the proposed modifications to the NPDES Phase 1 Municipal Stormwater Permit issued on March 18, 2009, and have no comment. Tacoma appreciates the effort made by Ecology staff to complete this permit modification.

In addition to requesting comment on the permit modifications, Ecology also solicited "proposals that would reduce costs of permit compliance, including, but not limited to, extending interim deadlines in the permit." Tacoma has one such proposal regarding the toxicity testing contained in Section S8.D.2.d. Tacoma proposes that the toxicity testing be delayed until after BMP monitoring is complete.

As you know, toxicity testing will require intensive effort during the first flush events to collect a representative composite sample large enough for the suite of tests necessary. During the same storms, new BMP sampling equipment will need to be deployed and maintained in addition to the 3 land use monitoring locations. Delaying the toxicity testing requirements until after the BMP monitoring period is complete would allow current staff to focus their efforts on two of the three monitoring efforts and hopefully increase success.

We appreciate your consideration. If you have questions regarding our comments, please contact Lorna Mauren at 253-502-2192.

Sincerely,

Dan C. Thompson, Ph.D.
Acting Asst. P.W. Director/Environmental Services

cc: Lorna Mauren, P.E.
Dana DeLeon, P.E.
Doug Mosich