

MAR 29 2010

WATER QUALITY PROGRAM



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March 25, 2010

Ms. Kathleen Emmett
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Attn: Ms. Emmett

Thank you for the opportunity to comment on the public review draft of the proposed modifications to the *WSDOT NPDES Municipal Stormwater Permit*. Our comments are attached in electronic format. You will find that the majority of our comments are suggestions to improve clarity or merely to call your attention minor typographical and formatting errors we discovered during our review. Please contact Larry Schaffner at 360-570-6657 should you have any questions related to our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan White'.

Megan White, P.E., Director
Environmental Services Office

MW:da

Enclosure

cc: Richard Gersib, Stormwater and Watersheds Program Manager
Larry Schaffner, NPDES Municipal Stormwater Permit Coordinator
Kenneth M. Stone, Resource Programs Branch Manager

WSDOT Comments on the WSDOT Municipal Stormwater Permit Modification

March 2010

Page 1

Since the geographic scope of the permit also includes Phase 2 designated areas, the front page of permit should read:

*National Pollutant Discharge Elimination System and
State Waste Discharge General Permit for
Large, ~~and Medium,~~ and Small Municipal Separate Storm Sewer Systems*

Page 12, S6.A.2.

To maintain consistency with the language clarification made in S6 regarding the use of the term *Detailed Implementation Plan*, we suggest the following revision:

*WSDOT shall meet the timeframes identified in either the TMDL or Detailed
Implementation Plan associated implementation documents.*

Page 17, S7.B.8.a.iii

The word “Phenolics” should appear as a separate parameter (i.e., *S7.B.8.a.vi. Phenolics*). Then correct corresponding numbering of the remaining parameters that follow.

Page 18, S7.B.8.b.iii.3) – 6)

Numbering typographical errors need correcting. Number sequencing should read “1)” through “4)” rather than “3)” through “6)”.

Page 26, S7.E.7.c

This sentence has a typographical error which should be corrected as follows:

Antecedent dry period, ~~e~~inter-event period and total precipitation depth.

Page 27, S7.E.9

The requirement for a final report for each BMP monitored did not appear in the original permit issued on February 4, 2009. Rather it appeared as part of the May 1, 2009 modification. While WSDOT did not have the opportunity to comment on this change, we recognize that an evaluation of the data could be beneficial for WSDOT. However, since Ecology's TAPE relates to testing and evaluating new stormwater treatment technologies rather than Ecology-approved BMPs, we recommend revising the last sentence to read:

The final report shall include an analysis of the performance data collected on the BMPs as described in the appropriate sections of Ecology's TAPE (available on Ecology's website).

Or the permit should identify and list the appropriate sections of TAPE that are being referred to.

Page 30, S8.E.3

S5.A.6 is referencing the wrong permit section. The correct reference should be S5.A.5

Appendix 7, Table of Contents

The following hyperlinks imbedded in the table of contents need to be established or fixed:

- 3.1 Illicit Discharge Identification (*missing hyperlink*)
- 3.2 Notification Procedures (*links to wrong section*)
- 5.4 Consultation with the Services (*missing hyperlink and page number reference*)
- 6.2 Requirements for Stormwater Retrofit in Puget Sound Basin (*missing hyperlink and typographical error*)
- 6.3 Opportunity-based Retrofits Outside of the Puget Sound Basin (*missing hyperlink*)
- 8.3 Information Management (*missing hyperlink*)

The following section reference needs to be added to the table of contents:

- 6.4 Project-triggered Stormwater Improvements

The following sections have incorrect section number references:

- 6.4~~5~~ Stormwater Retrofit Prioritization Process
- 6.5~~6~~ Stormwater BMP Retrofit Program Evaluation

Appendix 7, Page 2-3, Section 2.2.2

To maintain consistency with the language clarification made in S6 regarding the use of the term *Detailed Implementation Plan*, we suggest the following revisions:

3. *WSDOT participates as a member of Ecology’s TMDL advisory committees for those TMDL Water Quality Improvement Plans and associated TMDL implementation documents*~~*Water Quality Implementation Plans identified by WSDOT as priorities in Step 2.*~~
4. *WSDOT may participate when invited in adaptive management meetings convened to document implementation efforts in those areas where TMDL Detailed Implementation Plan actions have been assigned to WSDOT.*

Appendix 7, Page 6-5, Table 6-1

To improve readability, we suggest adding a page break so that Table 6-1 appears all on one page.

Appendix 7, Page 6-6, Table 6-1

To maintain consistency with the language clarification made in S6, we suggest the following revision:

<i>Locally identified erosion or pollution problems</i>	<i>Consult local basin plans, recovery plans, and associated TMDL implementation documents</i> <i>water clean-up plans for identified problems associated with stormwater runoff</i>	<i>Factors in well informed local knowledge</i>	3
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To improve clarity, we suggest the following revision:

<i>Phase 2 synthesis</i>	<i>Site received Phase 2 score of 8 to 12 are high priority, and those with 7 are medium priority, then those with next phase 2 highest score are with the next priorities ranked in descending order based upon their Phase 2: Field Reconnaissance score.</i>	<i>Gives higher priority to factors evaluated in Phase 2</i>	1
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