The following comments are from Puget Creek Restoration Society and are concerned with "The Industrial Stormwater General Permit" that is currently under review and in the process of receiving public comment.

Puget Creek Restoration Society is dedicated to protecting, enhancing and restoring the Puget Creek Watershed and similar streams, wetlands and green spaces on Commencement Bay and Puget Sound. Through hands-on restoration and research, educational outreach and by increasing environmental awareness, we seek to preserve this important habitat so it can become an example of what people can do to protect and restore the environment in an urban setting.

As in any organization we have an active source of volunteers. Last year, over 700 volunteers were involved in various activities. Currently about 250 individuals have expressed a desire to become regular members.

A major concern that Puget Creek Restoration Society (PCRS) has with the current draft permit is in the indiscriminate use of mixing zones to diffuse contaminated stormwater into the receiving bodies of water of this state. This concern is reflected in Department of Ecology (DOE) allowing such large mixing zones, the overlapping of mixing zones and allowing a gauntlet of mixing zone potential. What we mean by a gauntlet is that potentially there could be one mixing zone following another and another so on, as in the Puyallup River, which salmonids etc. would have to swim through for miles. Also the contaminated stormwater in the up stream mixing zone is then mixing with the next down stream zone and thus these mixing zones eventually are not fully mixing with the existing base water, that was originally used to assess the duration and quantity of water needed to mix the contaminated stormwater into. In all actuality the water is getting more and more contaminated as it flows downstream. Thus the criteria used to calculate how much area that the outflow pipe needs to diffuse the stormwater is based on uncontaminated river water but in actuality it is not, what is happening is that a percentage of the basal water is

contaminated from the up stream mixing zone. Thus the accumulation of contaminants is occurring as the river water flows downstream through more and more mixing zones, thus raising the level of pollution in the system that salmonids etc. reside in. What PCRS feels should be done is the total treatment of stormwater before it is discharged into a receiving body of water and that the use of mixing zones not be instituted at all. Mixing zones are not a cure but actually are adding to the problem.

Another concern is one that is applied to the visual monitoring reports. If these reports only have to be filed on site then this is leading to a possible problem "that detection of potential damaging discharges will not happen in any way to prevent a problem-if permittee chooses not to let DOE know of visual monitoring problems with discharge." If these visual monitoring reports are not turned over to DOE at the time of the report period then there is no way for DOE to prevent any potential problem from developing, thus no way to develop a prevention plan but ultimately waiting until a problem happens instead of preventing it.

If the industries are going to be allowed to perform their own turbidity testing etc. then these meters need to be calibrated on a routine schedule and to DOE specifications. Also DOE should develop protocol as to what are acceptable instruments to use and which are not. There should be recalibrating schedules in place to insure that these instruments are taking accurate measurements.

A major concern is who is going to determine if there is a ground water contamination problem or if one could possibly exist. Will DOE go out on regular intervals and check ground water or will DOE wait until a complaint is filed and ground water is contaminated severely? PCRS feels that testing on a regular basis is needed to prevent potential contamination from taking place instead of waiting until it is contaminated then doing something about it.

There must be a measure in place to assure the public, that there is follow up checking in the cases where applicants apply for "no exposure". This must be done so that safeguards are in place that will fully decree that when a business says it has "no exposure" that indeed that business falls under the "no exposure" scenario. Just filling out a form doesn't give that security to the public that is desperately needed.

PCRS is against suspending sampling for any business that has the potential to discharge contaminated stormwater into receiving waters even if they go for long periods without any problems. Their business is documented as having the potential to discharge contaminated stormwater and allowing sampling to stop could lead to a disaster. An event or accident could happen and if sampling isn't always done then there would be no way to detect potential hazards to this states waters. Thus sampling for all parties over the entire time period of this stormwater permit needs to be in place and no suspension of sampling should be done.

In the Permit is should define exactly when permittee is "out of compliance" (not generalizing when they could be out of compliance or giving variances) and if necessary the protocol needed to make sure permittee gets back into compliance (legal, financial or otherwise). Also if compliance by a permittee is exceeded then the public should be informed and a response by DOE to the public should be made as to what DOE is doing to make sure compliance by

permittee is reinitiated. Also if the permittee is out of compliance then that permittee should be referred to the new manual and protocol of that manual to get back into compliance through the requirements in the new Stormwater Management Manual.

The Permit Manual needs to provide a way for the public to know if any facility is out of compliance. This is to insure that the public has full disclosure of any potential health, environmental etc. hazards.

Finally, the design criteria for this permit for these facilities should address the worse case scenario and not an average scenario. This way there are measures all-ready in place so that any possible unexpected accedence's of discharge limits can be addressed prior to them causing potential harm to the environment.

Puget Creek Restoration Society feels that in order to properly protect the environment and human health that the above measures should be incorporated into this Industrial Stormwater General Permit. Unless these concerns are properly addressed PCRS can't support this General Permit as it now is written.