

Ste. Michelle Wine Estates

General Condition 8 will allow the Department to arbitrarily require monitoring wells during the life of the permit putting facilities at significant unknown financial risk. General Conditions 11 and 12 already give the Department the authority to revoke or modify the permit, but these changes must be in accordance with RCW 43.21B and/or Chapter 173-226 WAC. The proposed General Condition 8 does not have any governing statutes or regulations to ensure it is applied consistently and with due process. The Department has ample protection through General Conditions 11 and 12. General Condition 8 should be removed completely. If not, the Department should explain how General Condition 8 protects the environment in a way not already covered in General Conditions 11 and 12.

Comments on FORMAL DRAFT - Winery General Permit

SPECIAL CONDITIONS

S2.B.3.c

All samples must be analyzed by a laboratory registered and accredited for the test method being performed under the provisions...

S3.A.2.v

...but in **no** case heat in such quantities that the temperature at the WWTP exceeds 40°C (104°F) unless Ecology,...

S3.D.1

Conduct inspections as needed, but at least two (2) times per year, with emphasis on periods of wastewater generation and discharge.

S4.A.1.c.ii

Do not exceed a weekly average loading rate of seventy-five (75) lbs of BOD₅ per acre per day (lbs/acre/day), for each irrigation land.

S10.A.4

Retain the WPPP on site or electronically accessible from the site and make it available for inspection by Ecology personnel upon request.

S10.B.1.c

Add..."Site log book may be maintained in an electronic format, in a non-electronic format such as a binder, or both."

S10.B.5

Add..."c. Quantity of wastewater exported, in gallons."

S10.B.7

Keep all records and documents necessary to demonstrate compliance with this general permit on site or electronically accessible from the site.

GENERAL CONITIONS

G8

Ecology may establish additional specific monitoring requirements, including the installation of groundwater monitoring wells, by administrative order or permit modification.

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APPENDIX B – GLOSSARY

Significant Contributor of Pollutants

A facility that Ecology determines to be responsible for the discharge of pollutants to waters of the state and may reasonably be expected to cause a violation of any Washington State Water Quality Standard.

Significant process change

...then a significant process change would include changing your production volume by 25% or more than indicated on your application for coverage.