

# NorWesEnvironReg Implementation LLC

Comment - Form "Application for Coverage, Notice of Intent to Apply for Coverage Under A Winery General Permit," Section H 'Certification' - Delete the last sentence, ' "Unless the Department of Ecology Aquatic Invasive Species Management General Permit has a more stringent requirements, all FIFRA label directions and requirements will be followed" '. The sentence has nothing to do with certifying how the application and attachments were prepared. If Ecology feels the need to have a permittee commit to following FIFRA label directions and requirements include this as an item in the Winery Pollution Prevention Plan.

Comment - Mailing address on forms conflicts with the directions in permit on where to send form. Suggest form be revised to say "See Permit for mailing address."

Comment - Economic analysis needs to address cost of either training winery staff to meet requirements for obtaining wastewater samples that comply with required analytical methods, or of hiring a firm with personnel trained to obtain samples per analytical method.

Comment - Special Condition S.10.B.7.e, last sentence - strike the phrase "original strip chart recordings" and replace with "original chart recording or data file." Basis - Specifying "strip chart" unduly narrows the permittee's choice of instrument. Some circular charts are less expensive than strip charts. Also, use of electronic charts, equipped to automatically transfer data to a secure storage site is common practice; thus eliminating loss of data due to inking failure or running out of chart paper. Several models come with removable data storage (e.g., SD/MMC memory card).

Comment - Special Condition S12.A.2 - After phrase 'documents at the permitted facility' insert phrase - " or in a manner (e.g., 'cloud' storage) retrievable at the facility. As Ecology is encouraging use of electronic means for submitting or storing documents cloud storage can be more economical than on site storage. Economic analysis should address the cost of fire-proof file cabinets for records or cost of maintaining duplicate hard or electronic copies in separate areas as compared to cloud storage.

Comment - General Condition G4 - Ecology needs to provide a preferred means of verify that personnel with an Ecology credentials are actually agency personnel. Basis -Ecology identification badges can be faked and industrial espionage is not unheard of. Suggest a sentence - "The Ecology Regional Office can be contacted for verification of personnel.

Comment - General Condition G4 - Add F - Authorized representative of Ecology to complete any facility specific training required by WISHA prior to commencing inspection, unless inspection is being performed under warrant. Basis - neither OSHA nor WISHA allow for exempting Ecology authorized representative from training such as using ladders or scaffold, respiratory protection, lockout/tagout for hazardous energy. Dependent on scope of inspection this training may be required to access portions of the facility for an inspection.