

From: [Ryan Ransavage](#)
To: [Graul, Carrie \(ECY\)](#)
Subject: NPDES Comments
Date: Friday, December 08, 2017 2:38:36 PM
Attachments: [image001.png](#)

Carrie,

Thank you for the recent presentation on the changes to the Sand & Gravel General Permit. Miles has several comments regarding the changes Ecology has made to the forms, monitoring point location, and permit application.

- The inclusion of an optional section in a form is misleading. The forms are created to implement the conditions of the permit. It is inappropriate for Ecology to request information that is not required by the permit. As such, we are requesting the removal of any optional sections for form ECY 070-36.
- In the same vein, the online permit application requires all portions of the application be complete, even if they are not applicable, before being submitted. The online application process allows Ecology to require additional information that the permit does not require. One example of this is monitoring point location. The application requires the use of latitude and longitude to create a monitoring point. The permit does explicitly state a specific way of recording monitoring point location. The online application should allow for other ways to record monitoring point location. I would provide additional information on the online application, however the WEBDMR portal is currently down.

In general, Miles would like Ecology to adhere to the permit requirements and nothing more. The examples given above, may seem small now, but could create liability for Ecology in the future.

Thank you



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