



P.O. Box 1350
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Board of Commissioners
 Connie Beauvais, *President*
 Steven Burke, *Vice President*
 Colleen McAleer, *Secretary*
Executive Director
 Karen Goschen

June 28, 2019

Travis Porter
 Washington State Department of Ecology
 PO Box 47696
 Olympia, WA 98504-7696

Submitted via online Public Comment Form at: <http://ws.ecology.commentinput.com/?id=k3Zx2>

RE: Comments on Draft Industrial Stormwater NPDES General Permit

Mr. Porter,

I write on behalf of the Port of Port Angeles (Port) to provide our comments on Ecology’s draft Industrial Stormwater General Permit. Please consider the Port’s comments listed in the table below:

Port Comments on Draft ISGP

Draft ISGP Page/Condition	Draft ISGP Language	Port’s Comment/Question
Page 21 S4.B.1.b	Permittees shall sample the stormwater discharge from the first fall storm event each year. “First fall storm event” means the first time on or after <u>September 1st</u> of each year that precipitation occurs and results in a stormwater discharge from a facility.	Please clarify in the permit that this first flush sample may be included in an average with other samples collected in the 3 rd QTR. Make this clarification in the permit, not a separate FAQ document.
Page 36 S6.D.2.c.	If the waterbody is not listed within Category 5 (sediment medium) where the outfall discharges to the waterbody, the discharge is subject to the TSS benchmark in Table 7.	The Port understands the concern that stormwater discharges could be a source of recontamination to sediment cleanup sites. However, this benchmark is not the best means of achieving that objective and may in fact disproportionately hurt ISGP permittees without measurably reducing recontamination of sediment cleanup sites. Compared to other stormwater dischargers, ISGP permittees contribute a small percentage of the total stormwater volume flowing into receiving water bodies. By far a much higher load comes from municipal discharges, which provide the greater risk of contributing TSS loads and recontamination to Puget Sound Sediment sites.



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Port Comments on Draft ISGP – Continued

Page 45 S8.D.5.	Level 3 Deadline:fully implement.....no later than September 30 th of the following year.	Increase the deadline to September 30 th <u>two years</u> after triggering Level 3 Action. This timeline is the real-world minimum for most facilities.
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Over the last few years the Port has spent millions of dollars on stormwater retrofits and treatment to meet the requirements of the current ISGP. An industrial waterfront is important to the economic base of our rural community. Please consider the Port’s input and comments on the Draft ISGP.

Sincerely,

Jesse Waknitz
Port of Port Angeles – Environmental Manager
(360) 417-3430