

June 19, 2019

Travis Porter
Washington State Department of Ecology
P.O. Box 476696
Olympia, WA 98504-7696

RE: Port of Vancouver, USA Comments on the Draft NPDES Industrial Stormwater General Permit

Dear Mr. Porter:

The Port of Vancouver, USA (port) would like to provide comment on the draft 2020 NDPES Industrial Stormwater General Permit (draft permit) released for comment May 1st, 2019. The port takes environmental stewardship seriously, and it is our commitment to strive for programs and policies that allow nature and industry to successfully coexist. The port appreciates the State of Washington Department of Ecology's (Ecology) efforts to limit changes to the existing ISGP. Thank you for the opportunity to review and comment on the draft permit and we look forward to the response to comments for further clarification.

- Page 4, S1B.1. - Expand on the definition of significant contributor of pollutants to include an amount or explanation for "significant". How does Ecology determine if a facility meets this criterion? How does Ecology notify that facility and can a facility appeal this determination? The port recommends Ecology detail this process in a guidance document and reference that in this section of the permit.
- Page 7, S1F - Recommend using consistent definition of "industrial activities" with 40 CFR 122.26(b)(14)(1)-(vii) or (ix)-(xi). Recommend the Conditional No Exposure section mirrors the MSGP section 1.4 with its citation to 40 CFR 122.26(g).
- Page 10, S3.A - Define "qualified personnel" or suggest changing the language to, "...developed by a person who (1) possesses the knowledge and skills to assess conditions an activities at the facility that could impact stormwater quality; (2) can evaluate the effectiveness of best management practices required by this permit for this specific facility and its unique operations and; (3) is familiar with site operations and practices with sufficient authority to commit the organization to the BMPs and actions detailed in the SWPPP."
- Page 23, S4.B.7.c - Consistent attainment
- Page 45, S8.D.5 - It would be helpful for permittees to have additional time to implement level three corrective actions at more complex facilities.

Thank you for your time.

Sincerely,

Phillip Martello
Environmental Specialist
Port of Vancouver, USA