

June 20, 2019

Heather Bartlett
Water Quality Program Manager
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Heather:

Thank you for the opportunity to comment on the Draft Industrial Stormwater General Permit. We appreciate collaborating with Ecology on this permit to support the water quality protections near drinking water sources.

Our comment primarily related to the section on groundwater. We understand that this permit can be apply to discharges to ground, and we appreciate the continued protection of ground water that is appropriate under this permit. Pollutants from industrial activities can contaminate ground water used as a drinking water supply and we hope through this permit pollutant loads will be properly managed to reduce that risk.

We have the following comments:

S1 (E) – Discharges to Ground

1. The language in this section was modified to include the phrase “discharge point to groundwater” This is confusing and seems in conflict with RCW 90.48.080.
2. The language in this section was changed to include the phrase “discharge point to groundwater” This is in conflict with WAC 173-218 which prohibits direct discharge to groundwater.

The use of the term “groundwater” (e.g., on-site infiltration) should be changed throughout the permit. The term “ground” or the phrase “not in direct contact with groundwater” are more appropriate.

S3 (B) – Specific SWPPP Requirements

1. Consider adding identification of groundwater protection areas (GWPA) to the site map requirements.

S4 (A) - General Sampling Requirements

1. The requirements outlined in this section are geared towards surface water. We recommend additional information be provided related to ground water monitoring procedures.

Thank you for your consideration. If you have any further questions, please feel free to contact me at Mike.Means@doh.wa.gov or 360-236-3178.

Sincerely,

Mike Means
Director, Office of Drinking Water
Washington State Department of Health