

Tacoma Pierce County Health Department (Robbie Grico)

I wanted to comment, there's a couple of sections that I think could utilize clarification. In the preprocessor section on page 21, it states permit exempt facilities that are Co located etcetera are not required to meet the permanent requirements of subsection 3 through 10. I think that opens it up to a little bit of interpretation and kind of reads like they're not required to follow a specific section of code. I think it could be useful to add that these Co located permit exempt facilities are required to follow the the parent permit or the primary permit of where they are Co located.

The 5% by volume contamination levels in discussions with other regulatory entities, we've decide or we thought that without a an approved testing method or some standardized method of testing by volume, any regulatory action wouldn't be legally defensible. If we found a facility that was accepting more than 5% by volume, visual estimations probably wouldn't stand up in an appeals process. So having ecology develop something that would be enforceable and defensible would be very important.