

Washington State Department of Transportation

Thank you for the opportunity to review the proposed changes to the draft NPDES Bridge and Ferry Terminal Washing General Permit and fact sheet. The Washington State Department of Transportation (WSDOT) appreciates the opportunity to provide comments on the draft permit and fact sheet. We offer the following comments:

Draft permit

- S4. B12 Bridge Spot Cleaning pg. 12 The routine bridge washing conditions (S4.C12) does not require thorough dry cleaning if the bridge was washed the year before. This should also apply to bridge spot cleaning section. We suggest revising S4.B12 to: "For bridges that have been cleaned within the past twelve months and the discharge is to surface waters with flows greater than thresholds identified in Section S4.B.5, dry methods of cleaning prior to washing are only required if the bridge has nesting colonies of birds or visually loose paint. The Permittee must use dry methods and equipment (scraping, sweeping, vacuuming) prior to flushing that will prevent debris and substances from entering waters of the state."
- S4.C. Bridge Routine Maintenance Cleaning and Washing description; 1st paragraph line 3. Pg. 12. The Bridge Spot Cleaning description includes a reference that bridges are flushed to prepare for inspection. The Bridge Routine Maintenance Cleaning and Washing section is also used to prepare the bridge for inspection to detect potential structural issues. We suggest revising this sentence within the description to read, "Routine maintenance cleaning and washing involves washing structures, typically on a 1-5 year cycle, to remove dirt and other material, to extend the life of the paint, and prepare for bridge inspection to detect potential issues which can protect the structure."

Fact Sheet

- Pg. 3; 1st paragraph; line 4 The summary includes a line with a misspelled word for bridge preparatory washing. Please change filter "trap" to filter "tarp".
- Pg. 8; 1st paragraph; third bullet. Containment systems and drip tarps, and sieves are not required in the draft permit for spot cleaning. We suggest revising this sentence to read "Construct plywood or other work platforms".
- Pg. 19; B10. Short-term mixing zones The start date for flushing bridges in eastern Washington listed in the fact sheet is different than in the draft permit. We suggest changing "December 31st to December 1st" so the fact sheet matches the date in the draft permit.

If you have any questions about our comments, please contact Terry Drochak at 360.628.1007.