



Department of Ecology  
Water Quality - Storm Water

06.17.2024

Permit Writer,

I appreciate the opportunity to comment on the draft 2025 General Storm Water Permit. Please see my comments below.

S3B4bi5 (Employee Training):

Although I understand the goal, the addition of training vendors or third-party entities seems to be unreasonable and unvetted. Each vendor or entity, large and small, can send new team members to our site(s) at any point or time without notification. To train them in our site-specific stormwater permit seems unrealistic with the number of deliveries received daily.

Furthermore, there is no job position that would have time, the resources, nor proximity to maintain this "supervised at all times" proposed criteria. This is especially true when expected to maintain logs of vendors or entities who may enter the site that is trained or is needing training in the storm water permit.

Rather I think it would be better to include this awareness in our current Vinyl Extrusion team member annual training. Awareness that outside vendors or entities could affect our stormwater compliance and BMPs.

Again, thank you for the opportunity to comment on the draft permit.

Michael Hill  
EH&S Manager