

Lucas Samuel



Department of Ecology  
Water Quality - Storm Water

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Permit Writer,

Thank you for providing the opportunity to comment on the Industrial Stormwater Draft General Permit. Please see my comments below.

S3B4bi5 (Employee Training):

I understand the importance of properly training members that can impact stormwater. However, the addition of training vendors or third-party entities seems to be an unrealistic feat. Any vendor can send team members to our site without notice. To adequately train or supervise each of these team members would be near impossible to accomplish given the number of deliveries we receive each day.

Furthermore, we don't have a job position with the required resources, nor proximity to maintain the "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 stormwater permit.

I feel it would be more impactful to include this awareness in our current Tacoma Manufacturing annual stormwater training. This increases awareness that outside vendors can affect our stormwater compliance and established BMPs.

Thank you for allowing those impacted by this proposed change to provide feedback.

Lucas Samuel  
EH&S Coordinator