

# Parberry Environment Solutions

TO:

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FROM:

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We appreciate the extended opportunity to comment on the Draft Industrial Stormwater General Permit as many of the proposed changes directly impact our industry.

Spill Log (S3.B.4.i.)

"any liquid chemical release onsite regardless of size or flowability is considered a spill and must be logged and addressed."

Not only is this proposal impractical, but for some industries this is virtually impossible. The amount of time, manpower and effort required for this would be enormous not only for our business but for many others. Any size spot, drip, or stain noted on the ground would constitute a spill that would need to be examined, logged and remedied. We have a large number of customers, city and commercial recycling trucks, delivery drivers and contracted semis. How can we be responsible for someone else's vehicle that not only leaked all over our property but over the city, state, county and federal roads used to get to our facility. Will the state be required to monitor these roadways for spill and drips into the storm water as well? With this definition we would need a dedicated staff just to log and address "spills". It is unreasonable to suggest that any tiny stain on the pavement requires "addressing" by the Permittee. Furthermore, staining can be permanent, so will we need to reseal or redo all of our concrete/pavement to assure that we won't be flagged for being out of compliance for a stain on our concrete?

There were already requirements for spill response and logging in the previous permit. I believe these were sufficient enough, I propose all the new wording be removed from this section of the permit.

Stormwater Pollution Prevention Plan Revisions (S3.A.3.c)

Based on the proposed changes within this section of the Permit, Ecology will require Permittees to update and implement their Stormwater Pollution Prevention Plan (SWPPP) to be consistent with the 2025 Industrial Stormwater Discharge Permit (ISGP) on or before March 1, 2025. Updating SWPPP's are an expensive and time consuming endeavor. Our small business just paid a firm to update our SWPPP, this took 6+ months and cost us over \$10,000. Many consulting firms are already overwhelmed and do not have the staff to keep up with current requests, I don't see how they can possibly handle the burden of a mass SWPPP update before March 2025, which is less than 3 months after the permit will be issued. Given the cost and time associated with updating the SWPPP we suggest, at the very minimum, extending this time period.

Dumpster covers: (S3.B.4.d)

This would immediately put most recycling yards, and thousands of boxes, out of compliance. Adding lids will require sizeable time and capital investments which may not result in any better

protection of the stormwater. Large lids will make it harder for some customers to use bins due to size and weight, it will make loading harder and more dangerous. Furthermore, this adds a failure point to the bins which will increase repair costs. Most of the items we receive have been outside in the elements, not undercover, for long periods of time prior to be dumped at our facility. I do not believe the additional expenses are justified by the minimal, if any reduction to storm water contaminates.

Employee Training (SB.4.b.i.5) requires that in addition to fulltime employees, contractors and vendors "who have duties in areas of industrial activities subject to this permit" receive annual training. This is overly burdensome not only to the Permittee but to contractors and delivery agencies. Would a Scrap yard or garbage dump be required to train every customer who steps foot on our property? Employees and other personnel requiring annual SWPPP training should be more narrowly defined. We would need a dedicated employee to train vendors, contractor and scrap customers. The cost, time and effort required of the permittee doesn't justify the minimal impact this will have, if any, on the contaminates in the stormwater.

6PPD and 6PPD-q Report-only Quarterly Sampling (S4.B.9.)

Table 3. Additional Benchmarks and Sampling Requirements Applicable to Specific Industries

Report only reporting may not be applied to consistent attainment."

Consistent Attainment (S4.B.7.a) requires eight consecutive quarterly tests, for people who have no benchmark value, this is overly burdensome to require Permittees to quarterly sample indefinitely; especially for a contaminate that doesn't have local labs that test for the contaminate. There are few labs in the United States that offer testing for this contaminate, because of this, the testing cost is extremely high. This is a "report only" requirement that "will allow Ecology to characterize 6PPD-q in stormwater discharges from these sectors, assess the effectiveness of BMPs and other permit requirements to reduce 6PPD-q, and it may also help identify certain discharges and/or sites for further investigation and/or corrective action." These efforts and research for the ecology should not be at the ongoing expense of the Permittee.

PFA Sampling

We do not manufacture PFAs or PFA containing products. I do not believe it makes sense to force our industries to sample for something that has not even been removed from the products that we, as humans, use daily in our own homes. To make the greatest reduction of PFAS not only in our waterways, but to the general public, first the manufacturers of products that contain these contaminates need to be regulated. PFA can be found in clothing, cleaning products, shampoo/body wash, and even our food. Initiatives that help PFAS industries reduce use of these chemicals are the most effective means of reducing PFAS in the waste stream. PFAs cannot be eliminated from the waste stream so long as it persists in products that enter the waste stream daily. The proposed language doesn't specify which PFA's we will be required to test, but gives the suggested testing method 1633 which covers 40 different PFA. Does that mean we will be required to test for all 40? From what I have found there are no local labs that test for PFA's I cant imagine the cost of testing for 40 different PFAs would be economical for businesses.

PFAs are known as the forever chemical because they are present decades later. How will we be able to prove if the PFA is an old contaminate (from previous tenants of the property) or if it is directly from our operations or if it is from a product we receive at the scarp yard. This could open up our industries to costly lawsuits.

Lastly and most importantly due to the vast use of PFA containing materials used in field, laboratory operations, and most consumer goods brought to a sampling site it will be hard to get a sample that is not contaminated. If the environmental professional community is still gaining an understanding of correct sampling methodology, it is unreasonable for Ecology to expect that

industrial facility workers can master sampling in less than 6 months. Because of all the issues with PFA sampling and contaminates I propose that PFA sampling be removed from the storm water permit at the very least until there has been a significant reduction in PFA's that are in products everyone uses daily.

Thank you for your time and consideration of our concerns,

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