

# Snohomish County

1- In regards to landfills coverage for ISGP coverage/PFAS sampling requirements, the permit language is not clear, need clarification on the following:

A. Closed landfills that are capped and stabilized are exempt from the requirement to obtain an Industrial Stormwater permit, and therefore, No PFAS sampling is required? Right?

B. If a closed landfill has a CNE (Conditional no exposure) permit, the CNE permit remains valid.

C. For landfills that have been closed and stabilized but do not have a current CNE or any stormwater permit, is a CNE permit required? considering they have been closed for over 30 years?

We believe the permit language to be clear in this regard and clarify what does apply for each situation either an Open landfill or a closed landfill. (The word Active open landfill should be added when a requirement is added for an Open active landfill, and also clarify the exemption of closed stabilized landfills)

2- Does Ecology have any resources available regarding treatment technologies or media filters for PFAS and 6PPD, or studies on methods to reduce or control these substances in stormwater runoff when permittees lack means for control?

We think it would be a proactive approach if Ecology have resources for PFAS and 6PPD treatment published before mandating the testing.

3- What are the consequences if a sampling point is dry and a PFAS sample was not taken during a quarter?

4- For sites that are under consistent attainment status; will PFAS/6-PPD be exempt as well? Or do permit holders still need to sample quarterly, even though the site is exempt from sampling for other parameters, especially considering there is no benchmark for PFAS?

5- Are there any Ecology-certified methodologies, procedures, or Standard Operating Procedures (SOPs) for PFAS and 6PPD sampling?

6- Are there any recommended programs to train technicians on proper Ecology-certified PFAS/6PPD sampling procedures and guidelines?

We think it would be ideal if Ecology can publish or recommend a certain PFAS and 6PPDQ Sampling Procedures as there are many conflicting methods which may lead to wide range of results.

7- In connection to the above point: Alternatively, do Ecology require permit holders to hire consultants to sample PFAS and 6PPDQ? If consultants are required, is there a list of Ecology-certified third parties available?

If So, it would be ideal if Ecology can provide a list of certified approved consultants by Ecology.

8- In regards to the lowered permit limits for some required testing constituents, Does Ecology have any proposed resources for treating zinc, copper, and other required parameters? For example, filters, specific structures, media, etc.?

With the decreased permit requirements for testing parameters, it will be ideal if Ecology provide

some resources on how to treat these new lower levels.

9- Do all transfer station employees need to be trained, or is training required only for staff who maintain the stormwater system, perform inspections, and handle reporting?

10- If all transfer station employees are trained on SWPPP requirements, is it still necessary to require vendors and contractors to undergo training as well? Will trained employees be considered supervisors, given that site attendants and laborers are always present around the transfer station?

We believe that the requirement for vendor and customer training is excessive, particularly for a site like a Transfer Station where visitors are unpredictable on a daily basis. Site employees who are trained should be sufficient for monitoring the site, as they are always present and can respond promptly to any spill incidents. If this requirement is imposed it should exclude Transfer Station, as they are facilities service for the public and site staff should suffice the Training requirement.

11- Do permanent stormwater system maintenance technicians need annual training certificates?

12- Is there a recommended Ecology-drafted class or program that permit holders should attend to be considered trained? Alternatively, should permit holders draft their own training program?

Ecology should adopt a certified training program for employers to be able to similarly train employees and meet Ecology's required standards.

13- What is a Sampling Narrative, and what are its required components? Is a field sheet sufficient, or is it part of the testing lab report where they include a description of the laboratory procedures? Sampling Narrative should be specified what are the required components and an example should be published.

14- Does "Identify Discharges to Ground in SWPPP/site map" refer to identifying the final discharge point?