

Michael Jaynes

Thank you for the opportunity to comment. My comments are based as an individual who performs regulatory compliance duties.

I would recommend the analytical sampling methods table be modified to state that any method from 40 CFR Part 136 that meets the appropriate quantitation level is sufficient. In many areas of the state, the exact permit listed analytical methods are simply not available. Instead, the lab will run an alternative approved method from 46 CFR Part 146. Adding the QA/QC documentation to document it meets the QL is reasonable, but the additional statement "The permittee must also upload the QA/QC documentation from the lab on the QL development" is not appropriate to a standard, recognized method. This statement would be more appropriate to a newly developed analytical method and more appropriate to the Ecology laboratory certification entity.

The required spill log should be limited to external spills that would affect stormwater. This should be narrowed or at least Ecology could clarify what type of spills they are concerned about. Is there also a de minimis amount?

I agree with the requirement of educating third parties in the facility SWPPP. Some guidance would be helpful it what is expected. Typically, larger contractors doing a lot of site work are now provided handouts and toolbox talks. If these needs to be formal classroom training with recordkeeping this could be a different situation and difficult to comply with.

It would benefit Ecology to provide more guidance and help to regulated entities under the industrial permit – we all have the goal of preventing impacts to the environment. There seems to be little guidance or assistance to industrial permit holders for everyday situations. Current guidance appears to be aimed at Ecology staff and consultants working with municipal permits. There is a wealth of information submitted by permitted entities that could be used for research, unfortunately it is locked within the PARIS system which is poorly documented and unintuitive to work with. DMR reporting for stormwater situations is also a challenge, with limited WQWebPortal documentation. Ecology staff should remember that compliance staff work on multiple priorities and projects – they have general technical knowledge and want to learn but need help. When expectations are clear, we all benefit.