

American Concrete Pipe Association Northwest (Corey Fraser)

Concerns Regarding S3.D.3.a. & S3.D.3.b.

An essential principle in drafting permit conditions is that they must be grounded in sound scientific data.

The current draft permit falls short of this standard concerning these provisions.

It introduces broad prohibitions on process water discharges from multiple industrial sectors, including precast and pipe manufacturing, without presenting scientific evidence that such discharges cause environmental harm.

The draft mandates that all process waters—such as those used for dust control, cooling of aggregate materials, and washing paved surfaces—must be routed to lined impoundments engineered to handle a 10-year, 24-hour storm event. However, there is no supporting data to justify this blanket requirement.

Notably, many precast and pipe operations are conducted indoors or under cover, where roofs or equivalent structures prevent stormwater accumulation. This architectural feature eliminates the need for storm event–designed lined impoundments in many cases.

Implementing these conditions across precast and pipe operations will impose significant costs without clear evidence that water quality will be improved.

Moreover, the draft's requirement that all unhardened concrete solids—including comeback concrete—and concrete truck washout be discharged into lined impoundments is neither always necessary nor aligned with best industry practices.

Typically, unhardened concrete solids and truck washout are managed using onsite reclaimers—systems designed with impermeable detention capacity to capture concrete solids and water while allowing recovery of reusable sand and aggregates. These reclaimers, although effective in reducing waste and conserving natural resources, do not conform to the draft's definition of lined impoundments and are prohibited under the draft conditions.

Currently, comeback concrete may be stored or windrowed on bermed, impermeable surfaces, a practice that the draft replaces with a requirement to place such materials in lined impoundments designed for the 10-year, 24-hour storm event.

Since comeback concrete cures quickly and does not release free liquids during curing, this new requirement appears unnecessary and imposes avoidable operational burdens as it appears that the pouring of blocks would be prohibited unless done within a lined impoundment.

Finally, the draft's use of the term "discharge" in reference to unhardened concrete solids is misleading, as the term generally refers to water discharges under the permit.

Describing these actions as "placement" or "storage" (as referenced in S8.E.9.) would provide greater clarity and avoid confusion.