

Gerrit VanderWaal

Thank you for the opportunity to provide comment on this permit. I have the following recommendations:

- Section 5.1.3: Add language clarifying "dry weather day". Based on current language, the permittee is allowed to sample one day following cessation of rain, at which point there could still be comingled stormwater. Language like "samples shall be collected 7 days after most recent rain event" (or whatever the stormwater residence time is based on the pipeshed) is preferred.
- 5.2.11: ammonia is not an analysis of interest in this permit. Change to TKN/NN as referenced in 5.2.10 or change 5.2.10 & 7 to reference ammonia.
- 5.5.73: Change language in B from "calculate the average and" to "calculate the average of the RLs and"
- Section "Surface Discharge Station General Requirements": add sections similar to 5.2.9-5.2.12 for the Section 7 Subject Items commonly analyzed in laboratories, like sulfate and TCE