

From: A West [awestaa@gmail.com]
Posted At: Wednesday, April 08, 2009 4:31 PM
Conversation: Preliminary comment on permit modifications
Posted To: SW Permit Comments

Subject: Preliminary comment on permit modifications

Please regard this as a preliminary comment on the proposed modifications, and a request to extend the comment period in the event that the DOE cannot promptly produce necessary records regarding existing storm water systems.

The permit appears to have been modified to remove the term "violation" and make it virtually impossible for a permit violation to occur.

The permit, as modified, fails to incorporate timely reporting requirements.

The permit includes adaptive management terms that will allow unregulated discharges.

The permit, as modified will not protect water quality or comply with the minimum standards of the CWA.

In regard to Section E of the Phase I municipal permit, the Ports of Seattle and Tacoma appear to be granted 3 years merely to implement proposed practices and identify what their actual storm water systems are.

The Ports Should have a complete plan of their storm water systems already. If this information is not already maintained, there is a serious regulatory oversight.

Thank you.

When I have reviewed the proposals more thoroughly I will have further comments.

Arthur West