We are also attaching our metals report that discusses background sources and levels, as well as compliance issues (similar to dioxins) that would be encountered should these permit limits be applied to many other stormwater runoff sources, again including both developed and open landuses. This report suggests accounting for background levels when developing permit limits, as well as other important recommendations. Like the dioxin report, this metals report was also promised to your Board at an earlier hearing.

We apologize for the delay in getting this information to you. Please contact us with any questions that you, your staff or the Board members might have.

Very truly yours,

Michael K. Stenstrom, for the Expert Panel

Michael K Starche