



City of  
**REDLANDS**

Incorporated 1888  
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Paul Toor  
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Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000

**Re: Public Comment– 2017 Industrial General Permit Amendment**

January 25, 2018

Dear Mrs. Townsend:

On behalf of the City of Redlands, I would like to thank you for the opportunity to comment on the proposed amendment of the NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITIES ORDER NPDES NO. CAS000001 ORDER 2014-0057-DWQ, AMENDED BY ORDER 2015-0122-DWQ. I respectively submit the following with regard to ATTACHMENT I, COMPLIANCE OPTIONS of the proposed order.

ATTACHMENT I COMPLIANCE OPTIONS, SECTION II (B) states that “The Discharger may include the BMPs that capture and divert the required storm water runoff volumes to a publicly-owned sanitary sewer treatment facility, or to an on-site facility for on-site use. The minimum required storm water volume to be diverted shall be in accordance with the Section E.1 and E.2 below. The diverted or used volume of storm water is not authorized to discharge from the industrial facility.”

The preceding excerpt of the proposed amendment contains language that causes concern. Indicating that a Discharger has the option to “capture and divert the required storm water runoff volumes to a publicly-owned sanitary sewer treatment facility” infers permission to discharge into a Publicly Owned Treatment Works (POTW), which may not be allowed.

The effect of hydraulic overload during a rain event is a concern for POTWs. This condition has the potential to attribute to Sanitary Sewer Overflows (SSO) due to the decrease of capacity in collection systems during rain events. There is additional energy, chemical and operational costs

involved in the treatment of stormwater at the POTW. Additionally, increased flow during rain events has the potential to cause pass through and/or interference at a POTW.

I recommend that the ATTACHMENT I COMPLIANCE OPTIONS, SECTION II (B) include language that specifies a compliance option shall be approved by the local regulatory agency, in writing, prior to acceptance by the SWRCB. This type of statement would eliminate any implied permission as well as direct the Discharger to obtain the proper authority.

Sincerely,



Shannon Simmers  
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