

CASQA Draft Industrial General Permit Hearing Testimony

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Introductions

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CASQA Industrial Subcommittee Co-Chair

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CASQA Industrial Subcommittee

- Large (over 100) Multi-Disciplinary Group Of Experts
 - Industry (mining, landfills, auto dismantlers, recycling, aerospace, chemical mfg, petroleum)
 - Attorneys, Consultants, BMP Vendors
 - Municipalities (cities, counties)
 - Utilities
 - Academic Community

Industrial Subcommittee

- Appreciate the Effort and Significant Revision by the SWRCB since the 2011 Draft
 - Many positive changes
- Understand the SWRCB is looking for constructive comments, including suggested permit revisions language where appropriate
- Still a very complex, stringent permit that will have significant impact on industrial sites throughout California

Key Issues

- Receiving Water Limit Language
- Lack of Bypass and Upset Standard Provisions
- SWPPP Submittal Frequency
- NONA
 - Request deletion of phrase “*no discharge to groundwater that has a direct hydrologic connection to water of US*”
- Industrial Materials Definition
 - Retain “*that have the potential to be released with industrial storm water discharges*”
- Monitoring Provisions Associated 303(d) Impaired Water
 - Clarity on appropriate water body segment/listing

Closing

- Thank you again for the significant effort put forth in making revisions and providing an open stakeholder process over the last several years.