

**From:** [Timothy Simpson](#)  
**To:** [Fischer, Adam@Waterboards](mailto:Fischer.Adam@Waterboards)  
**Subject:** Comments on North OC MS4 Permit  
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Hi Adam, my name is Tim Simpson with GSI Environmental in Newport Beach. I'm working with the Coastkeeper on a project and was recently informed by them about the proposed prohibition on infiltrating runoff from industrial sites. I work with numerous industrial dischargers and I believe such a prohibition would have unintended and detrimental consequences. Infiltrating runoff from industrial sites, with appropriate pretreatment, can be a cost effective approach for compliance with the Industrial General Permit and provides the additional benefit of groundwater recharge.

I request that you reconsider the position your Water Board is taking on this issue. Infiltration should be allowed on a case-by-case basis for sites with favorable soil and groundwater conditions, and on sites with appropriate pretreatment to protect both the vadose zone and groundwater.

I urge you to review the infiltration studies published by The Council for Watershed Health in Los Angeles where long term monitoring of infiltration has shown the risk to soil and groundwater is low.

I'm happy to provide this information if necessary.

Thank you for considering these comments.

***Timothy Simpson***  
Principal Engineer  
GSI Environmental Inc.  
[4590 MacArthur Blvd., Suite 285](#)  
[Newport Beach, CA 92660](#)

[tssimpson@gsienv.com](mailto:tssimpson@gsienv.com)  
[www.gsi-net.com](http://www.gsi-net.com)

Main: [\(949\) 679-1070 x313](tel:(949)679-1070)  
Cell: [\(949\) 533-5116](tel:(949)533-5116)