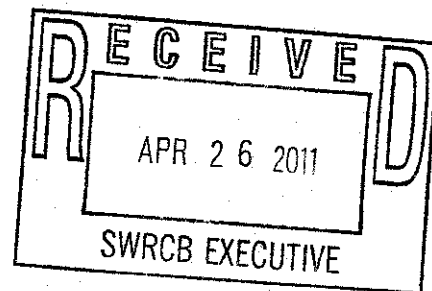




April 15, 2011



[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, Sacramento, CA 95814

Re: Draft Industrial General Permit for Stormwater Discharges

Dear Ms. Townsend:

Pacific Coast Producers appreciates the opportunity to comment on the proposed draft Industrial General Permit. PCP has attended the workshops provided by the State Water Board ("SWB") staff, and has the following issues of concern with the draft permit and information provided.

1. The draft Permit prematurely imposes numerical water quality limits.

As noted in the Fact Sheet issued by the SWB, in 2005 and 2006 a Blue Ribbon panel was convened to address the feasibility of numeric effluent limitations ("NELs") in California's storm water permits. The Fact Sheet also notes the panel's recommendations, which include:

- The Panel recognizes the inadequacy of current monitoring data sets and recommends improved monitoring to collect data useful for establishing Numeric Limits and Action Levels

Despite this recommendation, the SWB Draft Permit includes NELs and Numeric Action Levels ("NALs").

In addition, the panel noted that "future monitoring should be consistent with the type of industrial activity." Yet, the SWB Draft Permit makes no distinction between industries and the type of monitoring or the imposition of NELs and NALs.

Furthermore, the Panel recognized that some have moved industrial activities indoors, preventing storm water pollution, and that "regulatory relief from industrial Numeric Limits or action levels" should be provided. The Draft Permit does not recognize or provide relief for these industries.

The Draft Permit should be revised to reflect these recommendations, and, instead of imposing NELs and NALs, should provide for a monitoring program with scientific methods to establish the connection between the discharge, the constituents and the establishment of the NELs and NALs.

2. The draft Permit imposes additional burdens and costs with no commensurate water quality benefit.

The Draft Permit imposes additional requirements including:

- New training and qualifications for the SWPPP Developer and Practitioner
- Professional Engineer review
- Rain gauge and weather equipment
- Weekly inspections
- Daily inspections and cleaning
- Erosion and sediment control
- Additional frequency of inspections on qualified storm events
- Increased sampling
- Reporting of sample results within 30 days, rather than with report
- Corrective Actions
- Public access to information

PCP estimates that these additional requirements will run in the \$15,000 to \$18,000 range annually, depending on the current requirements for PE review, additional maintenance, training and manhours to fulfill the requirements.

Additionally, the rain measuring device is required, without any definition as to what devices, how they should be maintained and calibrated, where they should be sited, how they should be used in cold weather storms, or a myriad of other issues.

There is no evaluation, or opportunity to evaluate, whether or not these additional requirements will actually improve water quality of the runoff from the Company's facilities. PCP does not believe that any water quality improvements will result from the changes in the permit, as it pertains to PCP facilities.

3. Outreach and education with regard to BMPs would be more effective than the Permit's requirements.

Urban stormwater runoff is the single most significant source of stormwater pollution. For the SWB to further increase requirements on point sources, simply because it can be

done, is not a useful exercise. Education and outreach with regard to BMPs for residential customers would do more to reduce stormwater pollution. Education regarding BMPs for industry participants who have water quality issues would also be useful.

PCP respectfully requests that the SWB reconsider this draft IGP, take the time to accumulate and evaluate data prior to implementing any numeric limits, and revise the draft IGP once appropriate scientific analysis has taken place.

Respectfully submitted,

/MONA SHULMAN/

Mona Shulman  
General Counsel

