



March 4, 2014

Ms. Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

*Sent electronically via email*

**Subject: Comment Letter – April 1, 2014 Board Meeting: Final Draft Industrial General Permit issued February 19, 2014**

Dear Ms. Townsend and Members of the Board:

Brash Industries (BI) appreciates this opportunity to comment on the February 19, 2014 version of the draft General National Pollutant Discharge Elimination System (NPDES) Permit for the Discharge of Storm Water Associated with Industrial Activities (Industrial General Permit).

The attached comments are submitted by Marvin H. Sachse, a California State Professional Industrial Engineer, I 2688, with Master's degrees in Industrial Engineering and Environmental Engineering, a CASQA Trainer of Record and QSD/P for the Construction Permit, a Certified Professional in Storm Water Quality and Course Instructor, Certified Professional in Erosion and Sediment Control and Course instructor, Certified Erosion and Sediment Storm Water Inspector and Course Instructor.

The comments listed below deal with changes associated with the latest draft.

**Paragraph VII. B. New dischargers**

1. What documentation is required to demonstrate all discharges to the water body have been eliminated.
2. Does this apply to direct discharges only.
3. If commingling with other storm water discharges occurs does this Permit section apply?
4. Does this apply to discharges to a municipal storm drain system.

**Paragraph X.A. 3. F. Glossary - SWPPP List of Industrial Materials.**

1. The term Industrial Materials appears overly broad, particularly in reading the Glossary definition of Industrial Materials.
2. Suggest revision to Potential Polluting Materials or some definition of quantity.
3. Should define production/process materials with the potential to pollute. One can of WD 40 or one piece of lumber would require listing.

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4. Does intermediate products refer to manufactured sub components of subassemblies. This would be extremely difficult to inventory.

**X.E.e - Site map**

1. Requires identification of industrial materials storage area and tanks. Does this include storage areas within the confines of a building or the facility?

**X.G.d.ii Significant Spills**

1. "Spilled or leaked in significant quantity."
2. A definition of guidance in determining what is a significant quantity would be appropriate.

**X.G.2.viii - Estimating BMP Effectiveness**

1. In what form would the effectiveness estimates be prepared?

**X.H.4.b - Justification for not using each minimum BMP of or applicable advanced BMP...**

1. As this is a case of proving the negative, greater definition should be provided, particularly as associated with advanced BMPs which are continually changing.
2. Recommended that Permit wording include the phrase, "as identified in this Permit."

**X.H.2.b.ii - BMPs Storm Water Containment and Discharge Reduction BMPs**

1. Encouraged to utilize BMPs that infiltrate or reuse storm water...
2. Does the use of infiltration BMPs trigger the need for a WDR Permit.

The time spent in reviewing the above comments is greatly appreciated. If additional information can be provided please to do not hesitate to contact the undersigned.

Sincerely,



Marvin H. Sachse, P.E., ToR, QSD/P, CPESC, CPSWQ, CESSWI  
Principal