

SPECIAL HEARING

2/3/05

cc: BD, DI, DWQ

E-cys: BD, CC HMS, TH, CMW

Mr. Leo Cosentini
State Water Resources Control Board
1001 "I" Street
P.O. Box 944213
Sacramento, CA 94244-2130

1 February, 2005

Dear Leo

I am sorry we did not have the time to stay until the end of the workshop on Monday in Rancho Cucamonga. Both Peter Chiu and I appreciate the work that has been put into this project. I have enclosed our comments for your review. These same comments have been submitted to Ms. Irvin for the Board. We did hear some ideas during the testimony which to our ears had some merit. But one in particular rang out above the noise. "WE should either step back to an earlier version on this proposed regulation or stay with what we have until we can determine from a TMDL basis what needs to be done at what locations. Blindly attempting to generally fix specialized problems is not the best way. Lets spend our time and treasure doing something beneficial for water quality. We continue to support the BMP based rules and wish you all the best toward that end.



Stephen L. Bledsoe
President
SCRPA / SCRMCA

Building Materials Industry

Storm Water Group

1811 Fair Oaks Ave
So. Pasadena, CA. 91030

28 January, 2005

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, California 95812-0100

RE: Comments to the Draft Industrial Storm Water Permit dated December 15, 2004

Dear Board Members:

Our group has reviewed the new Draft Industrial Storm Water Permit. We are pleased to find that the permit is still a BMP driven. Our group has been involved in the Industrial Permit for over 12 years here in California. Under the Best Management Practices (BMP) based permit, we have seen significant positive changes from industries moving into compliance under this and preceding permits. We have several comments as to the details of this draft but again applaud the regulation for its dependence on achievable Best Management Practices as a vehicle to accomplish the difficult task of storm water discharge control.

We feel that the best technique to determine the contaminants in storm water is to rely on the TMDL process. The stakeholders and the scientific community will have a common goal to identify the reasons for the degradation of storm water from each water shed perspective. It is the most beneficial and effective way to determine each stakeholder's contribution to most efficiently utilization resources of time and effort. Moving the receiving waters to the end of every driveway is not practical or attainable. Constituents like copper, zinc and others are not a storm water issues, but rather, a reflections of background activities not within the purview or intent of storm water pollution prevention. Insisting on controls to yield lower levels than are represented in background studies is not an efficient use of this permit process. Working to reduce and control pollutants which are the direct result of industrial activities which effect the TMDLs, is a much more useful and attainable goal.

BMI comments on Draft Industrial Permit

Within our group many rock, sand & gravel mining operations have future holdings or potential reserve areas which may include several thousands of acres. To collect samples from each and every drainage area with a maximum combination of four samples into one is an impossible task in the time allotted (the first hour of a storm event). Many perimeter locations are not accessible by road and would present a hazard to personnel to safely access for sampling in dry applications not to mention in a storm scenario. The current permit allows for sampling of representative outfalls. This approach puts the burden of the representative proof on the operator, but limits the physical sampling to that which is safely possible to accomplish.

We would like to state that the current forms (Forms 1 thru 5) are helpful in the accomplishment of compliance in the current permit. It is our suggestion that the Forms stay limited in number and that as little variance as possible be made to the current well understood and easily used Forms which we are using today. Within this thought we also suggest that periodic inspections be left at monthly intervals. More frequent observations are not productive and will not provide additional useful data. In the same vane, in responses which require contact with group members no deadline should be less than 30 days. Multiple contacts cannot be accomplished in less than 60 days. Sufficient timelines will yield more thoughtful and effective communications particularly with larger groups.

Thank You for the opportunity to comment on this Draft Permit.



Stephen Bledsoe
Group Leader
BMI Group

Cc: Mr. Leo Cosentini, Storm Water Section, SWRCB

C:2005/ BMI/ Comments to Draft Industrial Permit