



County of Yolo

PLANNING AND PUBLIC WORKS DEPARTMENT

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February 3, 2005

Ms. Debbie Irvin
State Water Resources Control Board
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PO Box 100
Sacramento, CA 95812-0100

SPECIAL HEARING

2/3/05

cc: BD, DI, DWQ

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

Subject Comments regarding the Draft 2004 Industrial Activities National Pollutant Discharge Elimination System General Permit Regulations

Dear Ms. Debbie Irvin,

This letter submits comments and questions regarding the 2004 Draft Industrial National Pollutant Discharge Elimination System General Permit Regulations. The comments and questions refer to the specified sections.

Section VIII.3.f. Storm water Discharge Visual Observations

This section starts off with stating:

"Prior to anticipated storm events, dischargers shall visually observe all storm water drainage areas during operating hours to identify any spills, leaks, or uncontrolled pollutant sources and implement appropriate corrective actions. Pre-storm inspections are only required during operating hours. Dischargers are not required to conduct pre-storm visual observations within fourteen (14) days of a previous pre-storm visual observation."

Since weather forecasters are not 100% accurate at predicting when storm events are to occur or where exactly the storm will hit, this requirement is very impractical. We suggest deleting paragraph f as the new requirement in Section VII.8.i.(1) SWPPP Requirements, BMP, Good Housekeeping states:

"Inspect weekly all outdoor areas associated with industrial activities, storm water discharge locations, drainage areas, conveyance systems, waste handling /disposal areas, and perimeter areas impacted by off-facility materials or storm water run-on to determine housekeeping needs."

In addition, Section VIII.3.f. states that "dischargers are not required to conduct pre-storm visual observations within fourteen (14) days of a previous pre-storm visual observation" which conflicts with the VII.8.i.(1) requirement to "inspect weekly all outdoor areas associated with industrial activities..." Section VII.8.i.(1) goes on to require implementation of BMPs to prevent storm water from being impacted by these activities. Section VII.8.i.(1) achieves what Section VIII.3.f is trying to accomplish, therefore, you could delete Section VIII.3.f and just keep the Section VII 8.i.(1).

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Table VIII.2

This section lists the Benchmark Values that are to met by the permittees. Assuming that discharge locations are earthen ditches lined with vegetation, the Benchmark Values for all of these parameters, with the exception of Oil and Grease, do not take into account what the "background" levels for the site would be under non-industrial conditions. In other words, if a puddle of rainwater was tested for these parameters, the soil and/or plants in the puddle could potential cause the Benchmark Values to be exceeded. Thus, the requirement for follow up improvements in BMPs and an additional two rounds of sampling seems excessive.

The regulations should allow the permittee to assert that specific analytical results above the Benchmark Values may be from naturally occurring conditions for the site. We do not have a suggestion as to how to allow for the permittee to prove their claim as this would be site specific. However, if they implemented improved BMPs per recommendations from the RWQCB and the subsequent storm event still showed concentrations above the Benchmark levels, this may be considered adequate to show that the "normal" levels at this site exceed Benchmark levels.

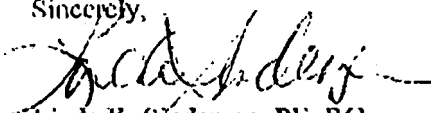
Test Methods For Analytical Parameters

We recommend the following changes to the table:

- Several of the other parameters could be analyzed using SW846 methods, which would meet the required detection limits. If possible, County staff recommends the following SW846 methods be added to the table as optional:
 - Total Organic Carbon: 9060
 - Chemical Oxygen Demand: 410.4
 - Nitrate + Nitrite: 353.2
 - Total Phosphorus: 365.3
 - Ammonia: 350.
 - Total Metals – 6000/7000 series
- Biochemical Oxygen Demand: 504.1

Please direct questions regarding these comments and questions presented in this letter to Barbara Heinsch, Senior Water Quality Specialist at (530) 666-8858 or Linda Sinderson, Principal Civil Engineer at (530) 666-8859.

Sincerely,



Linda K. Sinderson, PE, RC
Principal Civil Engineer
Yolo County Planning and Public Works
Division of Integrated Waste Management