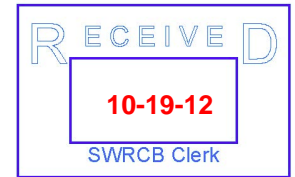




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October 19, 2012

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

Re: Alcoa's Comments on California's Draft Industrial General Permit

Dear Ms. Townsend and Members of the SWRCB:

Alcoa, the world's leading producer of primary aluminum and fabricated aluminum, has manufacturing locations in California that will be impacted by this proposed permitting action. These locations include Carson, Fullerton, Simi Valley, Torrance, City of Industry, Visalia, and Irvine. Alcoa submits the following comments for consideration regarding the revised draft California industrial general stormwater permit (draft CA IGP) that the SWRCB released on July 16, 2012.

- Numeric Effluent Limits (Page 10-12, Section I.N, Role of Numeric Action Levels and Exceedance Response Actions) - Alcoa recommends that California more closely tailor its Industrial General Permit approach to that set forth by the U.S. Environmental Protection Agency's (EPA) *Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity* (MSGP). The MSGP provides an effective approach to industrial stormwater general permitting, relying extensively on non-numeric technology-based effluent limits, compliance with water quality-based effluent requirements, corrective actions, documentation, and reporting. Furthermore, California should not put an emphasis on numeric effluent limits or benchmark exceedances, but rather used them as indicators as to when to implement/improve BMPs as part of a facility's SWPPP.
- Training Requirements (Page 23-25, Section IX, Training Qualifications) - The Qualified Industrial Stormwater Practitioner (QISP) requirements are overly burdensome. Furthermore, in order to ensure all permit tasks are completed by the appropriate level QISP, sites may need to obtain multiple QISPs at varying levels. Compliance with this requirement will be especially burdensome if the facility experiences site personnel turnover. Furthermore, the training must be either provided by the State Water Board or

an approved training course. However, it is not clear that the agency is prepared to provide enough training options/sessions to get all of the current permit-holders trained by the proposed effective date state-wide.

- Stormwater Visual Monitoring Frequency (Page 37, Section XI.A.2.a, Stormwater Discharge Visual Observations) - Alcoa recommends that SWRCB consider a reduction in the frequency of stormwater visual monitoring requirements for facilities that have significantly less opportunity to contribute to stormwater quality. In these circumstances, quarterly visual inspections (perhaps monthly during the rainy season) would be an appropriate compromise and still meet the intent of the requirement. Factors such as facility size, outdoor storage capacity, and industry category should be considered to determine a reduced frequency option.
- Pre-Precipitation Inspection (Page 37, Section XI.A.2.d, Storm Water Discharge Visual Observations) - The proposed "pre-precipitation" inspection requires constant monitoring of weather data to determine appropriate inspection timing. In addition to the burdensome monitoring and recordkeeping, this requirement will lead to redundant inspections when rain is anticipated but does not occur. Alcoa believes that this inspection requirement will not generate useful data and therefore recommends its removal.

Alcoa is also a member of the Federal Storm Water Association (FSWA) and supports several of the comments included in their recent submittal:

- Detailed Comments on Proposed Numeric Action Level Approach
- Detailed Comments on Proposed "BAT/BCT Compliance" Assessment
- Water Quality-Based Effluent Limitations Comments
- Comments Regarding Visual and Analytical Monitoring Requirements

For further details on these comments, please see the FSWA submittal of October 22, 2012.

Alcoa appreciates the opportunity to provide these comments on the draft CA IGP.

Sincerely,



Joyce M Fankulewski
Senior Environmental Consultant