

DEPARTMENT OF PUBLIC WORKS

FLOOD CONTROL • ENVIRONMENTAL & CONSTRUCTION • OPERATIONS
SOLID WASTE MANAGEMENT • SURVEYOR • TRANSPORTATION

Public Hearing
Draft Industrial General Permit
Deadline: 9/19/13 by 12 noon



COUNTY OF SAN BERNARDINO

SOLID WASTE MANAGEMENT DIVISION

222 West Hospitality Lane, Second Floor • San Bernardino, CA 92415-0017 • (909) 386-8701
Administration/Engineering Fax (909) 386-8900

GERRY NEWCOMBE
DIRECTOR OF PUBLIC WORKS



#28

September 19, 2013

Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

Dear Ms. Townsend:

The County of San Bernardino Solid Waste Management Division (SWMD) is pleased to submit the following comments and questions for clarifications with respect to the draft statewide General National Pollutant Discharge Elimination System (NPDES) Permit for the Discharge of Storm Water Associated with Industrial Activities (Industrial General Permit), dated July 2013.

Section XI. Monitoring, A. Visual Observations, paragraph 2. Sampling Event Visual Observations.

"Sampling event visual observations shall be conducted at the same time sampling occurs at the discharge location. At each discharge location where a sample is obtained, the Discharger shall observe the discharge of storm water associated with industrial activity."

- 1 At most of our closed landfill and disposal sites, storm water samples are collected in what we call "auto-samplers" that collect the initial run-off due to a qualifying storm event. These sites are for the most part, vacant, and technicians collect the storm water samples during regular work hours, usually hours or days after the storm event. Can the verbiage in the above paragraph reflect or clarify how this type of sample collection fits into the requirements?

Section XI. Monitoring, B. Sampling and Monitoring, paragraphs 1-3.

- 2 In the paragraphs referred to above, two storm water samples are required to be collected in the first half and two in the second half of the reporting year, respectively. Nothing is clearly stated that samples must be collected the first qualifying storm event, as in the current Water Quality Order 97-03-DWQ that requires sample collection during the first qualifying storm event of the rainy season (October 1 - May 31). Does this mean that this section refers to collection of two storm water samples from any two qualifying rain events of the half year in question?

Section XII. Exceedance Response Actions (ERAs).

- 3 Could you please explain how the ERAs apply to the following example of a closed/inactive landfill that has very little or any "industrial activities" but does experience a level of entrained soils from the landfill due to winds, some run-off from roads, slopes, upper decks, etc. during an qualifying storm event that occurs early in the reporting year. The storm water sample analysis may be high in total suspended solids (TSS) above the Numeric Action Levels (NALs) (both annual average and instantaneous). Subsequent qualifying storm event samples are below the NALs, and the annual average of the sample results still exceeds the NAL for the annual average. Furthermore, prior

Board of Supervisors

GREGORY C. DEVEREAUX
Chief Executive Officer

ROBERT A. LOVINGOOD First District JAMES RAMOS Third District
JANICE RUTHERFORD Second District GARY C. OVITT Fourth District
JOSIE GONZALES Fifth District

samples were historically below NALs. Could you please clarify if this landfill(s) would be an exception, or still required to fall under Level 1 Status?

Thank you for your consideration. If you have any questions regarding the content of this letter, please contact Sharon Bishop at (909) 386-8629 or Doug Miner at (909) 386-8761.

Sincerely,

For, Douglas Miner

David R. Doublet, P.E.
Chief Engineer

DRD:DBM:js