



April 21, 2011



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

RE: Draft Statewide General National Pollutant Discharge Elimination System  
(NPDES) Permit for the Discharge of Storm Water Associated with Industrial  
Activities  
Comment Letter - Draft Industrial General Permit

Dear Ms. Townsend:

The San Diego County Office of Education (SDCOE) is hereby submitting the following comments and questions regarding the Draft Industrial General Permit dated January 28, 2011 on behalf of the 31 school districts participating in the SDCOE Group Monitoring Program:

- Training Requirements (Permit Page 15). As proposed, it appears that all school districts with permitted bus maintenance facilities would have to send at least one person to a potentially multi-day QSP training course within one year of the Permit effective date. Can this requirement be satisfied by contracting with a QSP, who would help implement the SWPPP (by providing guidance), but not be necessarily situated on-site?
- Monitoring Requirements (Permit Pages 23, 24, 26, 29 and 30). The proposed monitoring requirements are excessive. The following inspections, visual observations and sampling would be required:

BMPs

- ✓ Weekly outdoor area and equipment inspections (Permit Page 23);
- ✓ Daily outdoor material/waste handling equipment or containers (Permit Page 24);  
and
- ✓ Quarterly areas of industrial activity inspections (Permit Page 26).

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### Monitoring

- ✓ Quarterly Non-Storm Water Discharges Visual Monitoring (Permit Page 28);
- ✓ Monthly Storm Water Discharges Visual Monitoring (Permit Page 29);
- ✓ Pre-Storm Visual Monitoring (Permit Pages 29 and 30); and
- ✓ Quarterly sample collection (Permit Page 30).

Daily and weekly inspections are not necessary. Monthly inspections of the outdoor areas would be more than sufficient (especially since pre-storm visual monitoring is also required).

- Monthly Storm Water Visual Observations (Permit Page 29). As written, the General Permit does not limit the visual observation hours to “scheduled facility operating hours” (as is specified for storm water sampling on Permit Page 31). We request that the Permit only require visual observations during scheduled facility operating hours.
- Additional Sampling Requirements (Permit Page 30):
  - ✓ As proposed, the revised requirements would be much more costly to implement than for the existing Industrial Permit. Each district would have to purchase pH and Electrical Conductivity (EC) meters (or a combination meter) at an estimated cost of approximately \$500 to \$1,200 along with calibration supplies. In addition, the estimated annual cost (including labor and analytical laboratory) to collect and analyze quarterly samples for pH, EC, Total Suspended Solids and Oil and Grease samples would be approximately \$300 to \$600 per year.
  - ✓ As written, storm water samples would have to be collected from all discharge points. We request that a provision be provided to allow the discharger to eliminate discharge points that are substantially identical (same as provided in existing Permit).
- Numeric Action Levels (Permit Page 34, Table 4). We understand that the NALs are generally based on the benchmarks set forth in the USEPA multi-sector permit (except for the EC benchmark). We believe they should be removed from the Permit for the following reasons:
  - ✓ The USEPA benchmarks were never intended to be NALs or Numeric Effluent Limits (NELs). NALs are not included in the similar State of Washington industrial permit.
  - ✓ The NALs are too stringent. The proposed NALs “raise the bar too high.”



- ✓ There is no basis for the EC benchmark, which is far exceeded by the EC in the groundwater and potable water EC levels in San Diego County.
- Corrective Actions Triggers (Permit Page 38). Based on our review of the SDCOE Group Monitoring Program data collected since the 2005-06 wet seasons, the proposed NAL triggers are overly restrictive. Based on 68 sample results, approximately 20 concentrations were below or within the proposed NAL values for pH, Total Suspended Solids, Specific Conductance and Oil & Grease (Permit Page 34). However, based on the proposed NAL Two Constituent and 2.5 time NAL Triggers (Permit Page 42), approximately 48 of the 68 sample results would have exceeded the Triggers and approximately 22 of 31 school districts would be subject to Level 1 or 2 corrective actions.
- Incentive for Compliance – Off-Ramps (Permit Pages 28 through 43). As written, there is no “off-ramp” allowing a discharger to return back to baseline monitoring conditions once a Level 1 Corrective Action has been imposed. As written, the Permit only allows a discharger to proceed into a more stringent Level 2 and 3 Corrective Action (but is never able to return to baseline compliance). We request that the Permit allow a discharger to return to baseline compliance after sample results demonstrate consistent compliance with the NALs in four consecutive sampling events.
- Conditional Exclusion – No Exposure Exclusion Requirements (Permit Page 44). Would a school bus maintenance facility that is structurally enclosed and/or covered to prevent exposure to rain, snow, snowmelt and/or runoff (including the bus maintenance, fueling and washing facilities, but excluding bus parking lot) qualify for this exemption?
- Non-Traditional MS4s (Permit Page 50) Paragraph XXVI.C. This paragraph is extremely confusing and should be removed in its entirety:
  - ✓ The requirements only appear to apply to non-traditional small MS4s that have been designated (which applies to a relatively small number of school districts).
  - ✓ It also requires that the designated non-traditional small MS4s amend their industrial SWPPPs to include all the control measures required under the existing Small MS4 Permit (Order No. 2003-0005-DWQ), which is also scheduled to be reissued around the same time as the Industrial General Permit.

All requirements for non-traditional small MS4s should be included in the Small MS4 General Permit (not the Industrial General Permit).



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- **Group Monitoring.** Although Group Monitoring is being eliminated, the Permit should allow for Groups to operate for the following reasons:
  - ✓ **Training.** Groups could provide industry-specific QSD/QSP training or the Group could provide a Group-specific QSP.
  - ✓ **SWPPPs.** Groups could provide industry-specific SWPPPs.

If you have any questions, please call Steve Herrera with Psomas at (530) 677-5286 or me at (619) 292-3598.

Sincerely,



Sally Anson  
School Facility Planning Analyst  
Industrial Stormwater Program Manager

SDH:SA:tlc

cc: Steve Herrera, Psomas  
Kathy Tanner, C.A.S.H. Representative  
Members of the SWRCB



San Diego County Office of Education  
6401 Linda Vista Road, #412, San Diego, CA 92111  
(858) 292-3600