

commentletters

From: Koken, George Scott <SKoken@semprautilities.com>
Sent: Monday, August 03, 2015 10:35 AM
To: commentletters
Cc: Melgoza-Mendez, Adriana; KHarrison@Geosyntec.com
Subject: 8/4/15 Board Meeting- Item 9. Consideration of a proposed amendment to the General Permit for Storm Water Discharges Associated with Industrial Activities (State Water Board Order 2014-0057-DWQ). (Written comments are due on August 3, 2015 by 12 noon.)



Importance: High

Comments for Item 9. Consideration of a proposed amendment to the General Permit for Storm Water Discharges Associated with Industrial Activities (State Water Board Order 2014-0057-DWQ). (Written comments are due on August 3, 2015 by 12 noon.)

The following Fact Sheet section is confusing and seems contradictory to the Order and Fact Sheet wording in its other sections.

The red highlighted words "after" in the underlined portion of the revised amendment Fact Sheet Section should read "before".

Discussion: We had coverage under the previous permit for several facilities and submitted all our certified PRDs prior to July 1. For one of these facilities, per storm water staff advisement and permit direction, we waited until after July 1 and submitted a NEC and corresponding fee several days after. This wording seems to indicate that we should have waited until after August 14 and after October 1 respectively.

The Section and wording:

Section II.A.3 (p.12)

All Existing Dischargers who certify and submit PRDs via SMARTS for NOI coverage on or after July 1, 2015 or for NEC coverage on or after October 1, 2015, who previously obtained regulatory coverage under the current permit, shall immediately comply with the provisions in this General Permit by July 1, 2015. All Existing Dischargers who previously obtained regulatory coverage under the current permit are required to certify and submit PRDs via SMARTS for NOI coverage on or after August 14, 2015 or for NEC coverage on or after October 1, 2015. All Dischargers who certify and submit PRDs via SMARTS for NOI coverage on or after August 14, 2015 or for NEC coverage on or after October 1, 2015, shall immediately comply with the provisions in this General Permit. All Dischargers who obtained NOI coverage under this General Permit starting on the effective date (July 1, 2015), but who were unable to electronically submit PRDs via SMARTS until August 14, 2015 shall comply with the provisions in this General Permit on July 1, 2015.

Please revise the amendment to correct any misinterpretation or confusion.

Thank You!

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