

# UNIVERSITY OF CALIFORNIA SAN DIEGO

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SANTA BARBARA • SANTA CRUZ

ENVIRONMENT, HEALTH AND SAFETY  
TEL: (858) 534-3660  
FAX: (858) 822-3194

9500 GILMAN DRIVE # 0089  
LA JOLLA, CALIFORNIA 92093-0089  
EMAIL: ADDRESS@UCSD.EDU  
URL: WWW.UCSD.EDU

February 14, 2018

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000



Subject: Comments on the Proposed Amendment to the Statewide Industrial General Storm Water Permit

Dear State Water Resources Control Board Staff,

The University of California, San Diego (UC San Diego), appreciates the opportunity to comment on the proposed amendments to the Statewide Industrial General Storm Water Permit. Like several other UC campuses and some other entities, UC San Diego has both an Industrial General Permit (IGP) and a Phase II Small MS4 General Permit for the same campus. Changes are being proposed for both permits to incorporate requirements to implement TMDLs. UC San Diego requests that the State Water Resources Control Board evaluate permittees that have requirements proposed for the same TMDL(s) in both permits and give these permittees the option to implement the requirements under one of the permit programs rather than both. The proposed requirements between the two permit programs do not have the same reporting requirements, submittal dates, etc., which creates duplicative effort to address the same TMDL.

For TMDLs for which industrial storm water has been identified as a source of the receiving water impairment, it is suggested that the proposed amendments to the Phase II Small MS4 General Permit include a provision such as: "If a Permittee has an IGP with requirements to implement the same TMDL, the Permittee may meet the TDML requirements under the IGP permit compliance program."

For other TMDLs, example language that could be incorporated into either the IGP or Phase II Small MS4 General Permit is: "If a Permittee has an existing NPDES storm water permit with equivalent requirements for the same TMDL, the Permittee may meet the TDML requirements under that permit compliance program."

Thank you for your consideration of these comments. If you have any questions, please contact Kimberly O'Connell at [koconnell@ucsd.edu](mailto:koconnell@ucsd.edu) or (858) 534-6018.

Sincerely,

A handwritten signature in blue ink that reads "Kimberly O'Connell".

Kimberly O'Connell, NPDES Program Manager  
UC San Diego, Environment, Health & Safety