SPECIAL HEARING
2/3/05
cc: BD, DI, DWQ
e-cys: BD, CC, HMS, TH, CMW

From: "Koza. Mike (MSA)" <kozam@SacCounty.NET>
To: <dirvin@waterboards.ca.gov>
Date: 2/18/05 2:29PM
Subject: Comments on NPDES Draft Industrial General Permit for Discharges of Storm Water

116. Sacramento county dept. of waste management

My comments (based on 15 yrs of part time experience in surface water sampling and analysis):
1. If the USEPA benchmarks represent the maximum acceptable levels, then the permitted levels should be a multiple (3-5x?) of this benchmark, since most sources will be well below the maximum acceptable levels most of the time (most exceedances will be eliminated upon mixing and/or diffusion). Alternatively, dischargers should be allowed to average their sampling results over all storms, before comparing to the benchmarks.
2. I am very opposed to the one-time scan (Section VIII.6). This is a Pandora's box. Once you do the scan and you find anything, you are on the hook to justify it, especially given the unreasonable benchmarks that are being established. Any site that has sediment is going to have metals in the water. If the state wishes to characterize stormwater runoff for their own database, then the state should fund the cost of the sampling and analysis. Alternatively, the one-time scan should only be imposed upon chronic water quality violators.
3. We might as well ban all dirt roads and dirt drainage channels in the County, because they will all be violators of the 100 mg/l TSS benchmark and the 1 mg/l iron benchmark (ref. Table VIII.2). A cost/benefit analysis and a full round of public hearings should be conducted before establishing 100 mg/l of TSS as a benchmark. If this requirement is to be imposed on County facilities, then it should also be imposed on owners of all parcels larger than a few acres, since all properties are subject to erosion and soil alteration. If we are to implement these requirements, then let's make it fair for everybody so as not to make it a politically-charged issue.
4. Samples should not be required to be collected from drainage areas that retain all water onsite unless there is a discharge to the storm drain or other offsite receiving water. Drainage contained onsite cannot and should not be required to meet effluent limits or storm water quality benchmarks.
5. Metals sampling should not be required unless the site processes metals; if metals sampling is required then only dissolved metals should be tested. Otherwise sediment loading will result in hits for numerous metals that are present in everyday runoff. Also, if the water has significant turbidity it will be difficult for the lab to analyze - thus, compliance with TSS limits should be effected before attempting to analyze for metals.
6. The requirements related to the benchmarks are such that the benchmarks are de facto effluent limits. I am at a loss as to why a distinction is made between the two, unless there is a political motive to attempt to downplay the significance of the requirements associated with the benchmarks.
7. The proposed magnesium benchmark of 0.0636 mg/l (ref. Table VIII.2) is unreasonable. There are no published water quality goals for magnesium that I am aware of, and the establishment of such a benchmark should not be done without substantial public hearings over an extended period of time. In my opinion, it will be impossible to meet this benchmark. Magnesium is commonly present wherever hardness is present. For example, the magnesium level in the Sacramento River is in the 5-10 mg/l range.
8. The proposed benchmark of 200 umhos/cm for specific electrical conductance (ref. Table VIII.2) is unreasonable. To attain such a low level will require all storm water drainages to be in a natural unaltered state. Economic justification for this benchmark should be provided, and establishment of such a benchmark should not be done without substantial public hearings over an extended period of time.

Mike Koza, PE
Associate Civil Engineer
Sacramento County Dept. of Waste Management
ph (916) 875-4556
fax (916) 875-6767
kozam@saccounty.net