Public Comment
Industrial General Permit
Deadline: 10/22/12 by 12 noon

UNIVERSITY OF CALIFORNIA

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ENVIRONMENTAL MANAGERS WORK GROUP

October 22, 2012

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

RECEIVED
10-22-12
SWRCB Clerk

RE: Comment Letter – Industrial General Permit

As the Chair of the Environmental Managers Work Group and on behalf of the ten-campus University of California system, I am submitting comments on the 2012 Draft NPDES Industrial General Permit (IGP) dated July 16, 2012 (The Permit). Comments from the University of California advocate for an IGP that focuses on improving storm water quality runoff from Industrial sites and eliminating redundancies.

UC appreciates the opportunity to provide these comments and assist with the Board's mission to protect and improve water quality in California.

Thank you for your consideration,

Julie A. Hampel
Environmental Managers Work Group, Chair
University of California

COMMENTS

1. NUMERIC ACTION LEVELS
    a. The University of California supports the development of properly derived and statistically valid Numeric Action Levels (NALs), specific for industry sectors listed by this Permit.
    b. Prudently define 'benchmarks' or 'action levels' completely and conservatively to separate Numeric Action Levels (non-enforceable), NALs, from Numeric Effluent Limits (enforceable).

2. QISP TRAINING
    a. The University of California is concerned that the July 1, 2014, timeframe for Qualified Industrial Storm Water Practitioner (QISP) implementation will not provide sufficient time for the State Water Board to develop and allow industry to receive QISP training to meet the permit requirements. The QISP effective date should be delayed until the QISP training is developed and implemented (i.e., 2 years).
    b. It takes personnel, time, and effort to train and be trained. Simplify this training and make a single Qualified Storm Water Professional training that is applicable for: Construction, Municipal and Industrial storm water programs.
    c. The trainings should be available and coincide with reporting schedules.

3. MONITORING IMPLEMENTATION PLAN
    a. Suggest changing the permit so that rolling samples from one quarter to the next if there isn't a qualifying storm event is an option, not a requirement. Taking additional samples is always an option. The minimum number of storms in the current permit is 2. Maintain this level of performance. Track and trend whether additional samples are necessary to meet the intent of the Permit. As currently written, all four sampling events could occur in the same quarter.
    b. For outfalls where there is a BMP to treat or detain using Low Impact Development (LID), this discharge point should not have to be re-evaluated during the quarter if it is not discharging during a storm event that is monitored. In other words, give credit for installing LID.

4. PRE-STORM INSPECTIONS
    a. University of California recommends that pre-storm inspections be replaced with monthly inspections. A regular monthly inspection is a preferred use of limited resources to the constant tracking of predicted rain events. These monthly inspections could encompass the elements in both the quarterly non-storm water inspections and the predicted storm event inspections.

5. REPORTING
    a. Provide a decision tree to streamline the possible reports needed to demonstrate BAT/BCT, Source, or Background. Include a process for Regional Water Quality Control Board approval prior to implementing a report option and/or a treatment BMP.