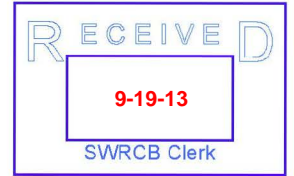




# County of San Diego



RICHARD E. CROMPTON  
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## DEPARTMENT OF PUBLIC WORKS

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September 19, 2013

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 "I" Street  
Sacramento, CA 95814

Dear Ms. Townsend:

### COMMENTS REGARDING THE PROPOSED CHANGES TO THE STATEWIDE INDUSTRIAL GENERAL PERMIT DRAFT ISSUED ON JULY 19, 2013

The County of San Diego Department of Public Works would like to address some of the areas of significant revision in the July 19, 2013, draft of the proposed Industrial General Permit. A number of concerns in our previous letters addressed to the State Water Resources Control Board (SWRCB) on April 29, 2011, and October 22, 2012, have been addressed in this latest proposed draft. We think these changes will be very beneficial to the industrial facilities in our jurisdiction, many of which are small businesses with limited resources. However, we would like the SWRCB to address additional concerns in the following areas: Implementation Date of the Proposed Permit, Sampling Frequency and Sites, and the Qualified Industrial Storm Water Practitioner (QISP) designation.

**Implementation Date of the Proposed Permit** – The proposed implementation date for the permit is January 1, 2015, i.e., mid-fiscal year. Under this scenario, the Qualifying Storm Event (QSE) criteria, visual monitoring, and sampling analytical parameters would potentially change half-way through the fiscal year. It would ease the transition to a new permit to begin implementation on July 1, 2015, so the new requirements will begin at the start of the fiscal year.

**Sampling Frequency and Sites** – Although the proposed permit has added a Sampling and Analysis Reduction section to help qualifying facilities reduce their sampling frequency from 4 times a year to 2 times a year, the permit still imposes a higher starting point for sampling and may not improve the pollutant characterization of a site. Many facilities in our inventory have already conducted extensive sampling under the current permit. It makes sense to allow them to count past compliance results toward the proposed permit obligations. Those with one or more previous fiscal years of sampling results below Numeric Action Levels (NALs) should qualify for a sampling frequency reduction. These historical sample data then would be recorded in the SMARTS database system.

The proposed permit would also make sampling more burdensome and costly by requiring two samples for QSEs from July 1<sup>st</sup> to December 31<sup>st</sup> and two additional samples for QSEs from January 1<sup>st</sup> to June 30<sup>th</sup> from all discharge locations associated with the industrial activity. Most of the industrial facility operators in our jurisdiction already have a difficult time obtaining one sample for a Qualifying Storm Event (QSE) during the rainy season (October 1<sup>st</sup> – April 30<sup>th</sup>). Moreover, sampling costs will increase proportionally. For example, the cost of analyzing Total Suspended Solids (TSS), Oils and Grease (O&G), and pH from one QSE for one sample location is approximately \$115. But, for a facility with four discharge points, this would result in an annual costs increase of \$1610 for these constituents alone. This is a significant increase given the minimal benefit to pollutant characterization likely to be obtained. A more efficient and cost-effective alternative is to require industrial facilities to sample from the most significant discharge area two times during the fiscal year (July 1<sup>st</sup> to June 30<sup>th</sup> of the following year).

**Qualified Industrial Storm Water Practitioner (QISP)** - The reduction of the three proposed QISP types down to one QISP designation will help to standardize the implementation of the permit. However, the QISP training and testing requirement standards should also be applied consistently and should not offer fast-track, self-guided training and certification for select groups such as geologists, engineers, and landscape architects. Since 1997, the specific activities required by the permit have been carried out successfully by other industry professionals representing diverse disciplines, and they will continue to do so during this next permit cycle. Therefore, only one training and test should be applied across the board for all industry professionals to ensure proper standardization for effective implementation of the permit.

In conclusion, the industrial facilities that we inspect tend to be small businesses that are trying to comply with the current Industrial General Permit with limited income. The proposed changes should take into account the current economic situation and implement changes that are economically and technically feasible while using sound science to protect water quality.

Ms. Townsend  
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If you have any questions, please contact Richard Diaz at (858) 495-5298 or by e-mail at [Richard.Diaz@sdcounty.ca.gov](mailto:Richard.Diaz@sdcounty.ca.gov)

Sincerely,

 (Jon Van Ryn) for  
Cid Tesoro, LUEG Program Manager  
Department of Public Works

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