

# DAVID A. SLUGA

#37

September 18, 2013



Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Stree, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Subject: Comments Concerning the Draft Industrial Permit - Dated July, 19, 2013

Dear Ms. Townsend,

Thank you for the opportunity to comment on the draft permit referenced above. For specific NPDES Permits like the Industrial and General Construction Permits, the provisions of the permit must ensure that the discharger's facility or site is best prepared when higher probabilities of a discharge may occur; therefore precipitation forecasts must be monitored to ensure that inspections are conducted prior to a likely or impending precipitation event. This provision is a part of the General Construction Permit, but apparently has been removed from the Industrial Permit between draft revisions.

1

According to the provisions included in Section XI, Monitoring, of the Draft Industrial Permit, a visual observation is required once a month on any dry day, during daylight business hours. With my experience that provision means a visual observation will be conducted near the first or last day of each month irrespective of potential precipitation events. The outdoor conditions at many facilities change drastically each day within a 30 day period. The result is a facility that documents the required observations, but really doesn't resolve any items which could cause pollution during storm water discharges.

2

Some others have stated that documentation of forecasts is difficult for facility dischargers. This type of provision is included in the General Construction Permit, and appears to be no problem for construction site dischargers. It should be no different for facility dischargers. Also, discharges need to prepare for several sampling events during the year which forces them to somehow be prepared when precipitation occurs. I would think that most discharges monitor the weather forecast in some way.

3

Please consider returning the visual observation requirement that is tied to predicted precipitation.

Thank you in advance for your time.

Respectfully,

A handwritten signature in blue ink, appearing to read "D. Sluga".

Dave Sluga  
Principal