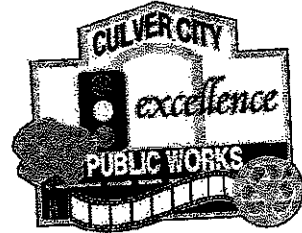


Culver CITY

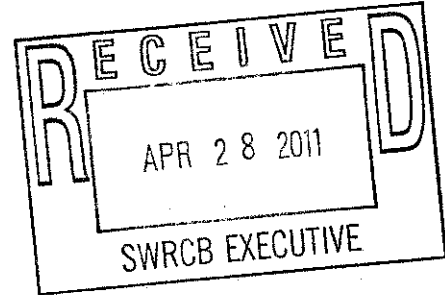
PUBLIC WORKS DEPARTMENT
ENVIRONMENTAL PROGRAMS & OPERATIONS DIVISION
9505 Jefferson Boulevard, Culver City, California, 90232



(310) 253-6421
FAX (310) 253-6430

Charles D. Herbertson, P.E., L.S.
Public Works Director/City Engineer

Damian Skinner
Environmental Programs & Operations
Division Manager



April 26, 2011

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

RE: City of Culver City's Comments on the Draft Statewide General National Pollutant Discharge Elimination System (NPDES) Permit for the Discharge of Storm Water Associated with Industrial Activities (Industrial General Permit)

Ms. Townsend,

The purpose of this letter is to provide the State Water Resources Control Board ("State Board") the City of Culver City's ("City") comments on the Draft Permit circulated for public comment by the State Board on January 28, 2011. Attached is a matrix of the City's comments for each section of the draft permit.

The City appreciates the opportunity to provide these comments on the draft permit and look forward to working with the State Board to achieve our mutual goal of improving storm water quality. If you have any questions regarding the comments, please contact me at the above listed telephone number or Kaden Young, Associate Engineer, at (310) 253-6445.

Thank you

Damian Skinner

Culver City Employees take pride in effectively providing the highest levels of service to enrich the quality of life for the community by building on our tradition of more than seventy-five years of public services, by our present commitment, and by our dedication to meet the challenges of the future

No.	Section	Text in Question	Comment
1.	I.G.50.	In order to improve compliance with and to maintain consistent enforcement of this General Permit, all dischargers are required to appoint two positions – the Qualified SWPPP Developer (QSD) and the Qualified SWPPP Practitioner (QSP) – both of whom must obtain appropriate training. Together with the key stakeholders, the State and Regional Water Boards are leading the development of this curriculum through a collaborative organization called The Industrial General Permit Training Team. The QSD and QSP training programs will include an exam to demonstrate competency.	This provision would require more funding in an already tough economy. Will the Water Boards provide the training? Would the dischargers be allowed to hire a consultant with the right qualifications of QSD and QSP?
2.	I.O.63.	California Water Code Section 13367 requires facilities handling pre-production plastic pellets to implement BMPs to eliminate discharges of plastic pellets.	Culver City is glad that the Water Boards have put this requirement upon the dischargers instead of holding the municipality as a responsible regulator.
3.	V.E.2.	Compliance storm event verification shall be done by reading an on-site rain gauge.	Would dischargers be allowed to use any type? Are there specific brands/models that the Water Boards approve of? Is there a specific location that the unit has to be placed?
4.	X.A.	All dischargers (including dischargers Subject to Level 1 Corrective Actions) shall collect storm water samples from the first qualifying storm even of each calendar quarter. Dischargers who fail to sample the first qualifying storm event of the quarter shall sample the following qualifying storm events that occur during the quarter. The discharger shall document in the annual report the reasons for failing to sample required qualifying storm events.	It is difficult to collect two qualifying storms within business hours under the current permit. Sampling four events under the same restriction would be arduous and compliance would be difficult to achieve. Additionally, the 3 rd quarter (July, August, September) is the dry season for Southern California, which yields very minimal to no rain events.
5.	X.E.2.	From a storm event that was preceded by two consecutive days (48 hours) of dry weather.	This is good news, it would give dischargers more opportunities to sample instead of the previous provision of three consecutive days of dry weather.
6.	X.F.	A discharger shall collect samples from all storm water drainage areas within four hours after a qualified storm event has been determined. This only applies during scheduled facility operating hours.	This is good news, it would give the dischargers more time to sample.
7.	X.K.	Field measurements for pH and TSS shall be performed on each sample collected using a calibrated portable instrument. Dischargers are not allowed to combine samples from different drainage areas prior to field measurements.	Are there specific brands/models that the Water Boards approve of? If the dischargers are sending the samples to a laboratory, why can't the laboratory test the samples for TSS and pH as well?
8.	XI.	The discharger shall electronically report through SMARTS all analytical results within 30 days of obtaining the results.	Could the 30 days be extended to 45 or even 60 days? During a rain event, local laboratories are bombarded with sampling requests and may require more time than usual to produce results.