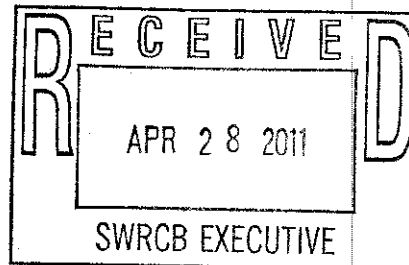


April 28, 2011

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



**Subject: Comment Letter – Draft Industrial General Permit**

Dear Ms. Townsend,

Thank you for the opportunity to submit the comments on the new draft General Industrial Permit:

In regards to professional registration:

**VII. TRAINING QUALIFICATIONS AND CERTIFICATION**

**B. SWPPP Certification Requirements**

**1. Qualified SWPPP Developer:**

- b. A QSD shall have one of the following registrations for certifications, and appropriate as required for:
  - i. California registered professional civil engineer;
  - ii. California registered professional geologist or engineering geologist;
  - iii. A California registered landscape architect;
  - iv. A professional hydrologist registered through the American Institute of Hydrology;

The Storm Water Pollution Prevention Program has been already implemented for a number of years and there are many experienced and in my opinion qualified people who do not hold the "registered professional" certification. On the other hand, many of the above listed registrants do not necessarily have the experience in Storm Water Pollution Prevention.

I agree that it is good to have qualifications specified, but I would like to propose substituting the above listed requirement with a requirement of Bachelors degree and specific number of years of experience. In my opinion, complimented with the proposed additional requirement for a successful completion of the State Water Board-sponsored or approved QSD training course would best serve all the parties involved.

- GHG Inventory & Management
- Compliance Assessments & Plans
- Environmental Audits
- Recordkeeping & Reporting
- Annual Emissions Reporting
- Air Quality Permitting
- Emissions Assessment & Inventory
- Air Toxics & NESHAPS Compliance
- Health Risk Assessment & Modeling
- Title V Permitting & Compliance
- RECLAIM Compliance & Reporting
- SCAQMD Variances
- Violation Responses
- Fugitive Emissions Monitoring
- Form R Reporting
- Storm Water Compliance
- Industrial Waste Water Compliance
- Risk Management Plans
- Hazardous Materials Management
- Waste Management
- Hazardous Waste Minimization
- Contingency & Emergency Planning
- Training
- Regulatory Management
- Compliance Software

In regards to effluent limitations:**V. EFFLUENT LIMITATIONS**

*A. Storm water discharges from facilities subject to storm water effluent limitations guidelines in federal regulations (40 C.F.R. Subchapter N) shall not exceed those effluent limitations. The effluent limitation guidelines for storm water discharges subject to Subchapter N are found in Attachment H.*

*B. Storm water discharges and authorized non-storm water discharges regulated by this General Permit shall not contain a hazardous substance equal to or in excess of a reportable quantity listed in 40 C.F.R. Part 117 and/or CFR Part 302.*

*C. Numeric Action Levels (NALs), found in Table 4, are derived from the US EPA Multi-Sector General Permit's benchmarks, and are used as numeric thresholds for corrective action. Exceedances of an NAL are not a violation of this General Permit.*

*D. Dischargers in Corrective Action Level 3 (Section XVII.D) are subject to a numeric effluent limitation (NEL) that will be the same numeric value as the applicable pollutant NAL. A daily average exceedance of the NEL is a violation of this General Permit and may subject the discharger to mandatory minimum penalties.*

Please take into consideration that not all facilities are in equal situation. For instance, I have a client that is located at the lowest gradient level from the whole neighborhood and has the main storm water discharge drain located on their property. The surrounding neighborhood is mixed residential and industrial and contains a sanitation yard where big cistern trucks and similar are parked and maintained. My client receives water from a semi-circle of at least 1 mile radius – and there is nothing that they can do about a quality of the incoming storm water to their property. They can only run their business and implement BMP to avoid/minimize addition of pollutants caused by their operation (which is sawdust in worst case scenario). The proposed general permit would only penalize them for neighbors' actions. Berming the whole property is impossible in their circumstances, not only that it would be cost prohibitive, but it would block access to their premises.

Could you please consider adding to the current requirements that in the event that the incoming storm water already contains more than the typical background pollutants and it is not feasible to block the incoming water, the facility is allowed to:

- 1) Either: sample the incoming water and compare difference in pollutant presence between incoming and outgoing storm water to the effluent limitation, or
- 2) Selects sampling points not necessarily where storm water is leaving the property, but rather where they would be more representation of facility operation, at the points that would avoid co-mingled storm water flow.

Thank you very much for your consideration.

Best Regards,



Natasha Meskal, Ecotek