

Building Materials Industry

Storm Water Group

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Storm Water Panel Report

Deadline: 9/1/06 5pm

VIA FEDERAL EXPRESS

August 25, 2006

Storm Water Board
P. O. Box 100
Sacramento, CA 95812-0100

Attention: Ms. Song Her
Clerk to the Board

**Subject: SWRCB- Blue Ribbon Panel Recommendation on Feasibility on
Numeric Effluent Limits for Stormwater**



Gentlemen:

The Blue Ribbon Panel's report on feasibility to numeric effluent limits did its job on recommendations for stormwater. It has delineated bacteria, viruses, toxicity, pathogens, and among others health problems from the stormwater to the receiving waters.

Total Maximum Daily Loads (TMDL) appears to be the method needed to be considered to solve some of the stormwater issues in a watershed. There are unknowns for a wide range of pollutants in the stormwater. The assertion that "numeric limits" should be set to meet the TMDL may require further discussions to avoid misinterpretation.

Coagulants and flocculants have been suggested for the treatment of sediment in stormwater runoff from the detention basins with filters. The use of flocculants and filters has been demonstrated to be expensive and labor intensive. For the treatment of two micro "clay" by chemicals in the stormwater at the site is not known to be effective with different molecular structures of clay varied drastically from location to location. Even with the highest grade of coagulants has residual that is not acceptable to the state of California's Proposition 65.

Adding chemicals to the treatment of stormwater to be safe, effective, and feasible at the site may require "tier" permit in California. The suggestion of using flocculants to abate total suspended solid (TSS) has to be demonstrated with supports. These should be considered before making treatment a requirement. There are a multitude of BMPs that can be considered in the control of sediment. USEPA discourages using chemicals for the treatment of water. Suggestion of the new stormwater technologies has to be moved with care and deliberation for the studying of the costs and benefits. However, not all of them can be achieved better than the background conditions that are not attributed to the operation.

Turbidity is caused by suspended particles in water. The suspended particles causing turbidity included organic and inorganic matter and plankton. In rock, sand and gravel, the operator uses water from the wells or portable water provided by the municipality to separate the sand from the gravel and rock to become a commodity to be used in the ready mix concrete and road base for the transportation system. Most of the additives in concrete are neutral as required by the regulations. Since there is no direct relationship between suspended solids and turbidity, exact comparisons between the two are difficult to make in particular the organic substances in the stormwater as none are produced by the aggregate producers.

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Trying to redefine stormwater as a "point" source for any operation larger than five (5) acres appear to be far reaching from the panel. By implication, each industrial site would become a **POTW** to control the discharge of stormwater by including chlorination of bacteria and organic particles. To impinge an industrial operator in the position for the amount of chlorine to be added in the stormwater to make contact with bacteria from the organic materials to form trihalomethanes (THMs) that are harmful to human health is dangerous. Critical point where chlorine demands has to be met for the water treated. Any further chlorine added will result in free chlorine being kept in solution to form potentially harmful organic compounds. Using nephelometric turbidity units (NTU) for stormwater to evaluate in-plant operation for industrial setting is undesirable. For the proper amount of chlorine to be added and to monitor to the treatment of the water is the job for a specialist in the water treatment.

Existing BMPs can handle the numerous pollutants from an industrial site. Ongoing research and development will provide improvement to the effectiveness of the BMPs for each operation.

In conclusion, rock, sand, gravel and aggregates come from the natural deposit. Neither Portland cement nor asphaltic cement is manufactured at any of the facilities participating in the BMI stormwater monitoring group. None of the participating sites are subject to stormwater effluent limitation guidelines, new source performance standards, or toxic pollutant effluent standards. Stormwater is a complex issue. Limited scare resources should be allocated wisely for the benefit of the people of California. Making decisions requires trading off one goal against another. Waterboard has a responsibility and a profound role to our economic future.

It took ten (10) years for USEPA to develop the rules and regulations. It will take more than twenty (20) years to solve some of the inherent problems to be contented with from the date of the issuance of the Blue Ribbon Report on Numeric Limits for Stormwater.

Sincerely,



Stephen L. Bledsoe
BMI Group Leader

cc: Jerry Secundy, Board Member
Tom Howard, SWRCB
Bruce Fujimoto, SWRCB
Leo Cosentini, SWRCB

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