

From: "Mignone Wood" <Mignone.Wood@lsa-assoc.com>
To: <commentletters@waterboards.ca.gov>
Date: Thu, Jun 29, 2006 9:53 AM
Subject: Storm Water Numeric Panel Final Report

Dear SWRCB,

I am a consultant to numerous aggregate quarries in the greater San Francisco Bay Area. We are concerned that the proposed numeric limits won't reflect the quality and condition of the existing native waters that mingle with the storm water run off at the quarries. We have several quarry sites where the numeric limit of either PH or SC for the native water (creek and or spring water) are higher than the Agg. Industries SWPPP's recommended benchmarks. How will the proposed limits handle situations like this? There is one site that is bisected by numerous creeks, all of the native water has high levels BEFORE it enters the site. So when they take water samples at the point of discharge the numeric results are high. We want confidence that you can "establish appropriate objective limitations or criteria" pg. 3

Finally, I find the report a bit confusing. We are familiar with storm water issues for Industrial Activities and not with municipal and construction activities. So when the report refers to "the industrial activity is similar to actives covered by the MS4 permit, the approach or limits for industries should be the same as for MS4 permittees." and "The same conditions and issues related to active treatment discussed in the construction section apply here." I do not know what it is referring to. Please be sure that future reports are written in a more consumer and user friendly way.

We appreciate your attention to these matters.
Sincerely,

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Numeric Effluent Limits
Deadline: July 28, 2006