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Subject: Comment - Tentative Order No. R9-2019-0008
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Shelter Island Boatyard thanks the San Diego Regional Water Quality Control Board for the opportunity to comment on the subject order. Here are our comments.

We respectively ask that the Board rescind its new requirement that we collect storm water discharge samples after normal operating hours. We believe that we will be unable to effectively collect such samples if we face an unexpected and catastrophic downpour late at night. Please note that discharges are rare and extremely unlikely given our history. We haven't discharged since approximately 1987.

We are a small business with limited resources. We really don't know how to cost-effectively collect samples off the clock. Even if we carefully plan out a rainfall event, we are subject to failure during nonoperating hours due to a surprise and immediate rainfall deluge. We simply lack personnel who, after a hard day's work, are reasonably able to be here at 3 a.m. to either prevent or sample a fugitive discharge.

During operating hours, we can muster regular crew to avoid discharge. We can engage additional pumps and storage. If there is an electrical outage, we can set out gasoline power portable pumps, and/or rig a generator. If there is a discharge, we will be able to observe its location and take a sample. Those and other alternatives are not reliable options after hours and in the dark.

We looked at the feasibility of installing automatic sampling equipment. The engineering would be extremely challenging given the number of potential sampling points and unknown areas where discharge might occur. The equipment, maintenance and equipment-exercising effort would be extremely costly. We know from the experience of large facilities that this equipment requires significant attention and has been unreliable.

Please note that our current permit requires only operating-hours sampling. We also note that the current NPDES General Permit for Storm Water Discharge Associated with Industrial Activities only requires sampling during scheduled facility operating hours.

We believe that we and other boatyards, when faced with such an event, will find it almost impossible to meet this requirement. Unfortunately, we may face severe penalties for noncompliance, yet we will still be without an after-hours sample.

If your objective is to obtain samples from boatyard stormwater runoff, we suggest you focus on boatyard facilities which are likely to experience stormwater discharge during the rainy months. Our boatyard is designed to contain all rainwater. We are extremely unlikely to discharge. We are not structurally set up to collect samples after operating hours.

To summarize, we believe that after-hours sampling is impracticable in the circumstances we have

outlined. We believe there is little or nothing to be gained by such a requirement. We believe you should only require sampling during scheduled facility operating hours.

Thank you again for allowing us to comment on this Tentative Order.

SHELTER ISLAND BOATYARD

Roy Hobbs, CEO