

From: "Sajjan, Nirmal" <Nirmal.Sajjan@ci.mtnview.ca.us>
To: 'Debbie Irvin' <dirvin@waterboards.ca.gov>
Date: 2/18/05 4:20PM
Subject: Comments on the Draft General Permit no. CAS000001

Special Hearing
2/3/05
cc: BD, DI, DWQ
e-cys: BD, CC, HMS, TH, CMW

The purpose of this e-mail is to provide the State Water Resources Control Board (SWRCB) technical comments from the City of Mountain View (City) regarding the re-issuance of the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of storm water associated with industrial activities. These comments reflect the opinions of technical staff, and the City appreciates the opportunity to provide comments to the SWRCB on the draft permit to improve surface water quality.

105. city of mountain view

The facilities covered by the general NPDES permit also include closed landfills such as those maintained in Mountain View. Refuse is the industrial material found in closed landfills that are covered with final landfill covers. Final certified closed landfill cover shelters landfill materials from storm water. Leachate and landfill gas are by-products of a typical closed landfill and are collected and properly abated under specific permits without impacting storm water runoff. Annual or quarterly landfill cover inspections and resulting immediate repairs/maintenance will maintain landfill cover integrity and ensure there is no exposure of landfill materials to the storm water. Because closed landfill surfaces are continuously inspected and maintained, it seems appropriate closed landfills be permanently exempted from the NPDES permit requirements.

Section X of the draft general permit describing conditional exclusion requirements should be revised to clarify closed landfill exclusions. The final landfill cover provides permanent storm-resistant shelters to landfill material from rain, snow, snowmelt, and / or runoff, and the definition of storm-resistant shelters for closed landfill should be expanded to include final landfill covers. Alternatively item 3, industrial material requiring no storm-resistant shelter (buildings) can be expanded to include closed landfills covered by the final certified landfill cover.

In addition to these specific comments, the City concurs with the comments from Los Angeles County Sanitation District submitted SWRCB through their letter dated February 14, 2005, File No. 31-370.40.4D. We believe that additional research is needed before surface water limits are included in the permit. It is recommended that industry-specific standards be developed that will correspond to the actual proven BAT/BCT performance.

Thank you again for providing us an opportunity to comment and continuous efforts of Board staff in the permit revision process. Please call me at (650) 903-6219, if you have any questions regarding these comments.

John T. Welbourn

Environmental Engineering Manager

Public Works Department

City of Mountain View

CC: "Sajjan, Nirmal" <Nirmal.Sajjan@ci.mtnview.ca.us>, "Welbourn, John" <john.welbourn@ci.mtnview.ca.us>, "Hosfeldt, Gregg" <Gregg.Hosfeldt@ci.mtnview.ca.us>