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October 16, 2012
In reply refer to 20012RC01938



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter –Industrial General Permit

Dear Ms. Townsend:

Pratt & Whitney Rocketdyne appreciates the opportunity to comment on the 2012 Draft NPDES Industrial General Permit for the Discharge of Storm Water Associated with Industrial Activities. Pratt & Whitney Rocketdyne is committed to environmental protection and compliance with all applicable rules and regulations. Please find below our comment and associated recommendation on the Draft Industrial General Permit.

Potential Pollutant Sources (Sec G.2.)

Comment: Sections G.2.a.i thru G.2.a.vii provides the minimum criteria that dischargers must include in their assessment of potential pollutant sources. The industrial pollutants identified in this assessment are also referenced in Section B.5.b, Sampling and Analysis, and are to be assessed for sampling parameter applicability. During the IGP Reissuance Web seminar held on September 5, 2012, questions concerning zinc as a pollutant were raised. During this discussion, it was verbally clarified that items such as galvanized fencing and structural materials such as roofing, were not considered industrial activity pollutant sources. This is not clearly stated in the Draft IGP.

Recommendation: Clearly state in the permit under Section G.2. (Potential Pollutant Sources) that items such as fencing, storm drain gratings, as well as structural buildings and roadways themselves are not considered industrial activity pollutant sources.

If there are any questions regarding the comment and recommendation above, please call Celeste Hamann at (818) 586-1392.

Sincerely,

Ronald S. Sherer, Manager
Environment, Health & Safety

CH:dv

EH&S-12-130