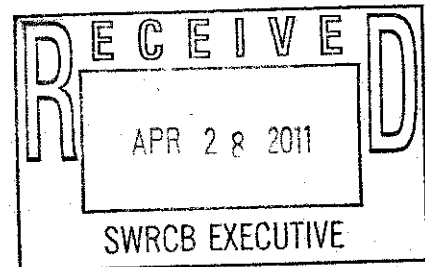




**PUBLIC WORKS DEPARTMENT**  
150 North Third Street • P.O. Box 6459 • Burbank, California • 91510  
www.burbankusa.com

April 27, 2011

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



Dear Ms. Townsend:

**Comment Letter – Draft Industrial General Permit**

Thank you for the opportunity to comment on the draft Industrial General Permit for regulation of storm water discharges associated with industrial activity (Draft Permit). The City of Burbank (City) has the following comments:

1. On the bottom of page 12 of the Draft Permit, Item II.S.1 does not complete the intended sentence.
2. On page 16 of the Draft Permit, Item VII.A.3 states "In the Annual Reports, the discharger shall document all of the training that the QSDs and QSPs have received." We suggest this item be clarified to state, "... all of the training as required by Section VII that the QSDs and QSPs have received."
3. On page 25 of the Draft Permit, Item H.1.g.ii states "Provide effective stabilization for inactive areas and all finished slopes, and utility project backfill prior to an anticipated storm event." It is not clear what utility project backfill means. Please provide a definition in Attachment K (Glossary) or further expand its meaning in this item.
4. On page 29 of the Draft Permit, Item IX.C.2 states "Dischargers shall visually observe the discharge of stored or contained storm water at the time of discharge during scheduled facility operating hours<sup>2</sup>." There is no footnote reference made to the superscript at the end of this item.
5. On page 30 of the Draft Permit, Item X.A states "All dischargers (including dischargers Subject to Level 1 Corrective Actions) shall collect storm water samples from the first qualifying storm event of each calendar quarter. Dischargers who fail to sample the first qualifying storm event of a quarter shall sample the following qualifying storm events that occur during the quarter. The

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discharger shall document in the annual report the reasons for failing to sample required qualifying storm events." It is not clear if dischargers must sample all subsequent qualifying storm events or just the next qualifying storm event. We suggest the second sentence of this section be revised to read "... shall sample the following qualifying storm event that occurs during the quarter."

6. On page 30 of the Draft Permit, Item IX.C.6 states "Prior to any anticipated storm event, dischargers shall visually observe all storm water drainage areas during operating hours to identify any spills, leaks, or uncontrolled pollutant sources and implement appropriate BMPs. Pre-storm visual monitoring are only required during scheduled facility operating hours." It is unclear if this visual observation is required for all storm events or just for a qualifying storm event (i.e., preceded by two consecutive days of dry weather).
7. On page 38 of the Draft Permit, Item XVII focuses on Corrective Actions. We believe one sample above the NAL does not merit corrective action immediately. Rather, two or more consecutive samples with levels above the NAL should require a corrective action(s).
8. On page 39 of the Draft Permit, Items XVII.B.3 and XVII.B.4 should all refer to Section XVII.B.
9. On page 40 of the Draft Permit, Item XVII.C.2 is missing a word in the portion that states "... , the discharger shall employ a (missing) to evaluate and ..." Also, Item XVII.C.5 fails to list subparts a., b., etc.
10. On page 48-49 of the Draft Permit, Item XXIII refers to Conditional Exclusion for Dischargers that Implement Green Storm Water Impact Reduction Technology (G-SIRT). We are requesting the G-SIRT standards in order to understand what is required to qualify for this conditional exclusion.

Once again, thank you for the opportunity to comment on the Draft Permit. Should you have any questions, please contact Mr. Alvin Cruz at (818) 238-3941 oracruz@ci.burbank.ca.us

Sincerely,



Daniel J. Rynn, P.E.  
City of Burbank  
Assistant Public Works Director