

# CITY OF REDDING



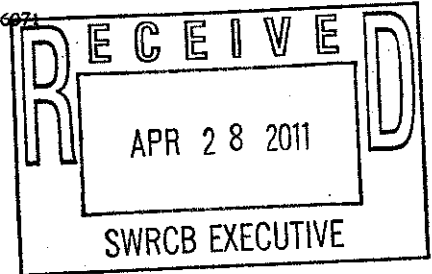
## TRANSPORTATION & ENGINEERING DEPARTMENT

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April 29, 2011



Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Subject: Comment Letter - Draft Industrial General Permit

Dear Ms. Townsend:

The City of Redding (City) offers the following comments on the Draft Industrial General Permit (DIGP):

1. Using EPA multi-sector benchmarks for all constituent NALs and NELs across the state will result in automatic noncompliance events and is inappropriate. For example, in much of Shasta County where the City is located, soils contain naturally high concentrations of iron. This results in high iron values during regular storm events where there is storm water runoff from native landscapes. Lab tests of background levels found over a period of 10 years of sampling in a tributary in the area document levels ranging from 1120 mg/l to 116,000 mg/l. Another tributary data set documents a range between 710 mg/l and 58,000 mg/l with an average of 12,535 mg/l over 8 years of sampling. Such high levels of background iron in our local tributaries is common, and it is well known that the soils are the source. Obviously, such high concentrations do not necessarily have anything to do with industrial activities.

As such, using Total Iron as a benchmark is inappropriate for determining if iron is being discharged as an industrial waste from a facility. Lab analysis for Total Iron involves dissolving the whole unfiltered sample including any soil sediments. If there is the smallest amount of soil present on the site which comingles with site discharge and results in any turbidity or elevated levels of total soluble solids (TSS), then iron levels will be elevated. Sediment loss from the site is measured by turbidity and TSS, not by Total Iron. If the goal is to measure iron discharged from the site as an industrial waste, then using filtered water samples is the appropriate method, and not unfiltered or Total Iron. The EPA benchmark for iron should be changed from Total Iron to a Filtered Iron sample. This method is more appropriate and accurate for monitoring iron concentrations potentially elevated due to industrial activities.

We strongly support the approach to the laboratory analysis for iron samples described above. However, if the approach described above is not acceptable, at a minimum, the local Regional Board office should be given the authority to assign local benchmark levels based on local soil conditions. This at least would provide an avenue to modify NAL/NEL values which would be reflective of local conditions.



2. The term "day" must be defined more specifically in the glossary. It is not clear how a "day" is defined. In the context of "Dry weather shall be defined as five consecutive days of combined rainfall of less than 1/4 inch...", the day could be defined as the 24 hour period beginning after the last drop of rain fell in the previous storm; the start of the next business day of operation; or the 24 hour period beginning at midnight. Having a defined "day" period will make monitoring requirements more clear and avoid confusion for the permittees.
3. There must be a clearly defined mechanism for permittees to switch from a higher action level to a lower one, for example from Level 3 back to Level 2. After some period of time, assuming compliance with the NEL/NAL, the Suspension of Numeric Effluent Limitations (SNEL) report or other method must be available to the permittee which allows a reduction of sampling and monitoring effort back to the previous level. Once a permittee can demonstrate regular and consistent compliance with the NAL/NEL, reduced monitoring is justified.
4. Given that there will be a significant increase in the cost associated with implementing the new permit, especially in such difficult economic times, the State and/or federal government must provide the necessary funding mechanisms to implement the new permit provisions. Local municipalities are enduring substantial hardships with the myriad of unfunded mandates. Adding one more unfunded program, which carries with it penalties for non-compliance, will only worsen the already deficient financial resources of cities, counties, and others subject to the permit. At a minimum, revenue streams that permittees can access, such as low interest loans and grants, would provide at least some help in meeting the shortfall. In addition, legislation that provides mechanisms for local assessments without the restrictions imposed by Proposition 218 is necessary for providing an alternate means for municipalities to fund such programs. Without a means to fund the program, permittees will have a very difficult time gathering the resources to comply with the permit.
5. Monitoring groups must be retained in the new permit. Group monitoring for the City has been highly beneficial. Using group monitoring personnel, resources, and data management provides efficiency and consistency for the IGP program. In particular, for small entities like the City, consolidating efforts allows a more compliant and effective approach which saves resources not only for the City, but for State and federal regulators as well.
6. The DIGP includes language that does not restrict the qualifications or backgrounds for those desiring certification as a Qualified SWPPP Practitioner (QSP). The City supports this approach. This comment is only provided in the event that more restrictive alternative background requirements are considered. Restricting the qualifications of potential QSP personnel would have significant financial and staffing implications for the City.

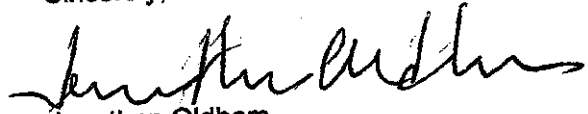
04/28/2011Ms. Jeanine Townsend

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April 29, 2011

Thank you for providing the opportunity to comment. In order to ensure we have the opportunity to comment on future versions of the DIGP, please ensure my name and address are included in any mailing list you may have. I can also be contacted by email at [joldham@ci.redding.ca.us](mailto:joldham@ci.redding.ca.us) or by phone at 530-225-4046.

Sincerely,



Jonathan Oldham  
Environmental Compliance Manager

JO/au

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cc:

Paul Clemens, Municipal Utilities Manager – Solid Waste  
Brian Crane, Public Works Director  
Josh Keener, Wastewater Compliance Coordinator  
Gene Marcinkowski, Assistant Airports Manager  
Martha Vuist, NPDES Coordinator

