

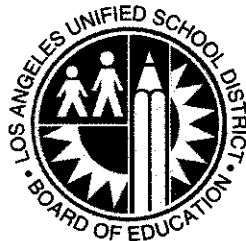
LOS ANGELES UNIFIED SCHOOL DISTRICT

Public Comment
Draft IGP
Deadline: 4/29/11 by 12 noon

JOHN E. DEASY, PH.D.
Superintendent of Schools

MICHELLE KING
Deputy Superintendent, School Operations

ENRIQUE BOULL'T
Interim Chief Operating Officer

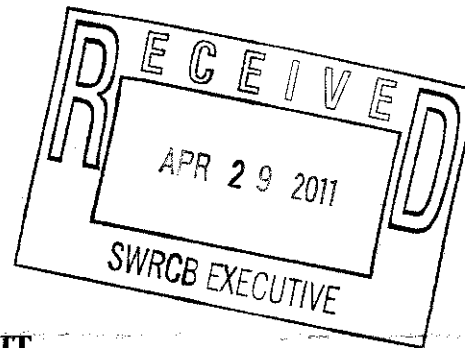


TRANSPORT:
2710 Media Center Drive/Suite 100
Los Angeles, California 90065
Telephone: (323) 342-1400
Fax: (323) 221-3121

DONALD WILKES
Interim Director

April 28, 2011

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:

Thank you for allowing the Los Angeles Unified School District (LAUSD) to review the State Water Resources Control Board's Draft Industrial General Permit for Industrial Activities. We appreciate the opportunity to provide these comments.

Upon review of the requirements it appears that the Draft Permit substantially increases cost of compliance with respect to site monitoring and equipment, water sampling, reporting requirements, and training of district personnel for rain event readiness. This comes during a time when LAUSD and other school districts are confronting increased costs of education combined with significant State funding reductions. The LAUSD offers the following requests for clarification and comment:

- Are Qualified SWPPP Developer (QSD) and Qualified SWPPP Practitioner (QSP) for construction activity storm water general permits qualified to be QSD and QSP for industrial activity storm water general permit?
- **The permit would require over 300 new or revised inspections and recordation of the inspections annually.** School districts are currently overburdened with federal and state compliance requirements. This permit is overly burdensome and does not consider the effort required by the district for compliance. We recommend that the number of inspections be reduced.
- **The cost to implement the permit is estimated to cost from \$29,400 to over \$100,000 if advanced treatment for exceeding numeric effluent limits occur.** Education has taken major budget reductions from the State since FY 2007-08 and is projected to take an additional reduction for FY 2011-12. The cost to implement the permit is not commensurate with the benefits. School district bus yards are not major polluters. We recommend that the SWRCB consider the cost of implementing the permit and where applicable, provide exemptions for school bus yards.
- **The permit incorporates the use of Numeric Action Limits (NALs) and Numeric Effluent Limits (NELs) in an improper utilization of these processes.** According to the California Storm Water Quality Association, the SWRCB proposed utilization of the NALs and NELs to set performance standards and remediation follow up for possible mandatory fines is improper and an incorrect adaptation of the United States Environmental Protection Agency processes into a storm water permit. We recommend that the NALs and NELs requirements be deleted.
- **The permit mandates that district staff must receive training from a State sponsored Qualified Storm Water Pollution Prevention Plan Practitioner training program and as a result would eliminate the**

MISSION STATEMENT:

The Mission of the Transportation Services Division is to support the educational process by providing safe, dependable, efficient and cost-effective transportation.

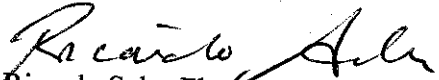
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need for group monitoring. We do not agree with this conclusion. The primary mission of district bus maintenance yard staff is to provide safe, reliable and available buses to transport students. Under "group monitoring" a monitor provides annual and as needed training as problems arise, reminds districts to conduct inspections and fill out reports, reviews reports for compliance, analyzes water samples, and answers questions. Elimination of group monitoring eliminates a vital source of information and expertise and would result in less compliance. We recommend that group monitoring be retained and if a district utilizes group monitoring, that district staff be exempted from the training requirement.

- The frequency of sampling storm water will be two times more than the existing permit if the site is under level 0 or 1. If the site is under level 2, it could be four times more than the existing permit. If the site is under level 3, it could be more than four times the existing permit. This will result in increased sampling costs to cash strapped Districts.
- Two of our bus garages are next to busy freeways. Debris and soot are deposited onto the garage parking lots by means of natural air and traffic currents or flow. The soot and debris is primarily caused by the City of Los Angeles' civic and industrial population and vehicles and not created by LAUSD school buses or vehicles located on the parking lot. ~~Three other bus garages are on busy 4-lane boulevards.~~ Our Sun Valley bus lot is adjacent to an airport landing runway. The same applies to our Business Division and Gardena garages which are next to busy freeways. The Total Suspended Solids (TSS) is very difficult to control now, we can't control the TSS that drifts onto the lots from freeways and highways. The lots are swept with a walk-behind sweeper or by broom, partly due to The Air Resources Board placing stringent emission levels on ride power sweepers. (LSI Rule) Garage sweepers have been salvaged due to the LSI Rule. Garages would need to purchase 4 new sweepers at \$30K each, plus the labor to operate the sweeper. We would need to sweep 3 to 4 times a week, as twice a week is still not enough to get down to the NAL 100 mg/l for the TSS. The cost in labor to sweep the bus lots is about; \$460 a week x 5 garages = \$2,300 a week or \$119,600. This is based on sweeping the lots 3 times a week.
- This Permit requires reporting and observation to increase. Monitoring and access to the internet for anticipated weather will be very time consuming. Our current resources cannot absorb these additional requirements to be accomplished and expect successful results.

It is our position that school district bus yards are different than truck yards servicing inter-state commerce, salvage yards, and land fill sites, and we respectfully recommend that the SWRCB consider our differences. To comply with these new requirements would place a direct hardship upon general fund dollars intended for educating children.

Sincerely,



Ricardo Salas Fleet Maintenance Manager Transportation Services Division
Los Angeles Unified School District

- c: Charles R. Hoppin, Chair, SWRCB
Frances Spivy-Weber, Vice Chair, SWRCB
Tam M. Doduc, Member, SWRCB
Roger Chang, Los Angeles County Office of Education
Donald Wilkes
Jay Golida
Patrick Schanen
Albert Leung
Talal Balaa
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Matt Webb
Soe Aung

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