

Attachment III - Editorial Comments

1. Finding 7, page 2 – Vallejo Sanitary District should be Vallejo Sanitation and Flood Control District
2. Finding 12, page should also include the CCMP Actions – 1.3, 1.4, 2.1 through 2.6.1, 3.2, 4.2, 4.3, 5.1 and 5.3.
3. The Fact Sheet should include:
 - a. A Goal of the Permit to implement the CCMP on page 1.
 - b. A section listing each of the CCMP Actions listed in Provision 12. and a reference to the Permit provisions that implement the Action.
4. Finding 14, page 5 – This finding appears to have been copied from an existing permit and is not all inclusive. It needs to be reworded to reflect that storm water runoff discharges to creeks which in turn flow to all the sub basins of San Francisco Bay, wetlands adjacent to the Bay and to the Pacific Ocean.
5. Finding 15, page 5 – Changes and additions:
 - a. Reword second line to read “interval between, depth, intensity and duration of hydrologic events.”
 - b. The finding can be improved by listing each pollutant of concern and examples of the dominant sources. Heavy metals could include sources such as motor vehicle wear, legacy pollutants and aerial deposition.
6. Finding 17, page 5, line 4 – The Water Board should require modification of a report if it is inadequate or incomplete rather than modifying a permittee’s report.
7. Receiving Water Limitations, page 1 (new page 6) – Second B.1. should be B.2. Recommend a footnote explaining the difference between water quality standard and water quality objectives.
8. Provision C.2. a.i.– High, medium and low traffic zones should be defined by average daily traffic. Recommend that low traffic zones as those with ADT < 1,000 medium 1000-5000 and large as >5000.
9. Provision C.2. a.i.(1)– Changes:
 - a. “Other pollutants” to “sediments >75-µm”.
 - b. Delete “large” schools because virtually all schools are land uses associated with large amounts of trash.
10. Provision C.2.c.ii.(1) – Change “avoid” to “prohibit”.
11. Provision C.2.e.i.(1) – Change to “implement BMPs to reduce to the maximum extent practicable discharge of wash water, sand blast material and paint drift to surface waters.”
12. Provision C.2.e.ii.(1) – Change “prevent” to “reduce to the maximum extent practicable”.
13. Provision C.2.e.ii.(1) – Change “protect” to “cover, berm or provide an equivalent BMP “.
14. Provision C.2.f.ii.(3) – Change to read “identify storm drain inlets or catch basins with more than three (3) inches accumulation “.

15. Provision C.2.g.ii.(1) – Define “characteristics” in a footnote as “Land uses, catchment acres, design capacity, trash control design features, wet well size, depth of inlet and discharge pipes.”
16. Provision C.2.g.ii.(2) – Define or delete “water quality problems”.
17. Provision C.2.h.iii.(2) – Clarify what is meant by “performance standards” or include the performance standards or delete since they have not been previously identified.
18. Provision C.2.i.i.(2) – Include a list of those facilities not covered by the SWRCB’s general permit or refer to a specific section in the general permit to allow easy identification of those already covered.
19. Provision C.2.i.ii.(2) – Changes:
 - a. “Routinely” to “Weekly”.
 - b. “before the start of the rainy season” to “24-hours prior to a rainfall event predicted to be > 0.25-inch depth”.
20. Provision C.3.e.i.(2) – Change “already largely developed” to a percent of the urbanized area that is developed. Suggest that a figure of 75% built out.
21. Provision C.3.f.iii. – Require that the name, qualifications professional registrations of the third party reviewer be submitted.
22. Provision C.3.g.iii(3) – Delete reference [Dale; Jill wrote this –do you agree?] since it is inappropriate that reference be included to a permittee’s role in writing the Tentative Order that will regulate them.
23. Provision C.3.g.iv.(2) – Delete “or method used to meet the HM Standard” since it is redundant with (1).
24. Provision C.4.c.i. – Change “employ” to “implement” to make consistent with a regulatory approach.
25. Provision C.6.c.ii.(4) – Include a footnote to define dry season ie. April 15 –September 30.
26. Provision C.8.c.ii.- Lafayette Creek flows to Las Trampas Creek that discharges to Walnut Creek. Monitoring of Walnut Creek should take place at least as far downstream as possible with its confluence with Concord Creek and ideally downstream of Grayson Creek in Pacheco Slough
27. Provision C.8.h.ii.(3) – Define a water quality problem as exceedance of a water quality standard/objective or prohibition.
28. Provision C.10.a.i. - Change “downstream waterways” to “creeks, wetlands, San Francisco Bay and the Pacific Ocean”.
29. Provision C.10.a.i. – Move the definition of trash to the Glossary.
30. Provision C.12.a.iii. – Identify the “appropriate agencies” as county health department, DTSC, DHS and RWQCB.
31. Provision C.13. – Change “perform” to “implement” to make consistent with a regulatory approach.
32. Provisions C.13.a. and C.13.b. – Change “Manage” to “Regulate” to make consistent with a regulatory approach.
33. Provisions C.13.a.i. – Delete “waste” since the objective is to control all runoff from these sources and not qualify it as a waste.

34. Provisions C.13.c.iii. – Delete “ , and such” or define what is meant by the phrase.
35. Provisions C.15.b.ii(1)(a) – Change “ground” to “turf or landscaped areas” since ground could be an impervious area with a high coefficient of runoff.
36. Glossary – Definitions should be added for the following:
 - a. Best Management Practices
 - b. Control Measures
 - c. Directly Connected Impervious Area
 - d. Drainage Efficiency
 - e. Enhanced Management Controls
 - f. Gross Pollutants
 - g. Low Impact Development
 - h. Offsite Project
37. Glossary
 - a. Emerging Pollutants – Add to (1) after “beneficial uses” “ cause or contribute to a public nuisance”
 - b. Equivalent Funds and Equivalent Offsite Treatment – Add “directly connected” just prior to impervious surface.
 - c. Infiltration Device – Define “fine grain soil” by Soil Classification Group or PSD.
 - d. Monitoring Project – The first item should be “Determine compliance with water quality standards and provide the basis for implementation of C.1 Provision.
 - e. Pervious Pavement – “Infiltrate” should be changed to “Percolate” to be consistent with the definitions of each.
38. Attachment K – This document appears to be written for POTWs and industrial facilities and many elements do not apply to storm water discharges. It needs to be completely reviewed and rewritten to apply only to storm water discharges to avoid misinterpretation and erroneous reporting.

February 28, 2008