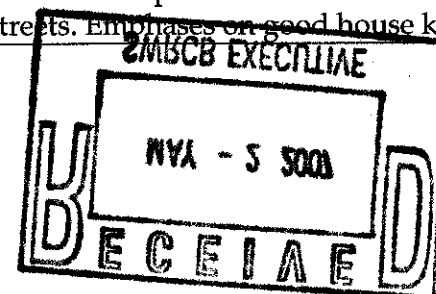


Stormwater Compliance Specialists, Inc. would like to submit the following comments on the preliminary Construction General Permit:

	Identify Permit Element/Issue/Concern	Location in Permit/ Fact sheet	Comment
1.	Hydro modification for new development and re-development.	Fact sheet pages 10,20,and 21; Permit section IXK	<p><b>Unacceptable</b> and should not be included in the permit.</p> <p>The permit should address the construction activities issues during all phases of construction and season. The language is duplicating the Municipal NPDES permit post construction requirements issued by the Regional Water Boards. It is more of local municipal planning process not as a part of construction activities. The permit should emphasize effective best management practices (BMPs/Source Control) during construction activities.</p> <p>Hydro Mod should be a statewide approach to areas where there is no Municipal permit has been issued by the Regional Board that needs water of State protection.</p> <p>Delete K2 thru K4; Too confusing and difficult to enforce. It is in consistent with local drainage design and regulations. It has nothing to do with actual construction activities. More clarification is needed to accomplish the intended results.</p> <p><b>Recommend the following Language:</b></p> <p>The SWPPP shall include description of Post Construction</p>

			consistent with Regional Board Municipal Permit and or local post construction storm water management requirements and policies. Short and long term funding sources including responsible party for operation and maintenance of approved post construction BMPs should be described.
2.	Permit VIII Provisions New discharger requiring permit coverage..... all PRD no later than 14 days.....mail the appropriate permit fee no later than seven days.....	Permit Section -1.a page 12	Recommend filing PRD electronically to 21 days instead of 14 days prior to construction. This will allow sufficient time for the state staff to process the PRD and the discharger are informed before the construction begins that PRD has been accepted. Submittal of permit fee should be same as 21 days.
3.	Permit Section VIII- Risk Category and Attachment F	Page 15 Section VII A	Acceptable provided include intermittent Creek and natural drainage channel that are dry in dry months and wet in rainy season.
4.		Page 15 section VII B	Unacceptable- Should be deleted. What is the intent of soil analyses? The emphases should be on source control using effective combination of erosion and sediment control BMPs for construction phases. Recommend Section B heading should be " <b>Best Management Practices</b> "  Describe effective erosion and sediment control practices to be used for both temporary and permanent based on best available technology, including time schedule for implementations during all phases of construction and season to minimize pollutants discharge.
5	Permit- Section IX Project Implementation Requirements	Page 15 Section IX A.2,	Acceptable provided clarification on SWARM use in detail. Simplified reporting form is highly recommended to simplify reporting requirements for SWARM
		Table 2 Page 16	Delete TPH. It cannot be measured in the field and it is too costly to get result within 48 hours. Visual observations can easily detect the source and correct it immediately. TPH presence is less during construction activities compare to normal run off from the urbanized or city paved streets. Emphases on good house keeping should abate



			such discharge.
6	Receiving Water Monitoring Section IX B	Page 16 and Attachment E	It is not a very effective indicator tool on water quality impact because of commingling with other municipal (MS4) drainage system. The result may not a good indicator of problems at the construction project. The receiving water sampling should apply only to site that has a direct discharge to Water of the State not for project run off discharges into city or county storm drainage system.
7	Section IX C Erosion Control	Page 18 C.1	<p>Soil cover examples should be included like the existing permit Order #99-08 Section A.6</p> <p>Soil cover or stabilization is always temporary measures as all construction projects do have permanent landscape measures upon completion of the project.</p> <p><b>Recommend the following language for C.1:</b></p> <p>The discharger shall implement an effective combination of temporary erosion and sediment control practices for all inactive areas within 14 days from cessation of any soil disturbance or 48 hours prior to onset of predicted rain storm whichever occurs first. Temporary erosion and sediment control practices shall be implemented at a minimum 48 hours to the onset of rain event. Temporary soil stabilization shall consist of measures such as: hydraulic mulch, hydro seeding, soil binders, straw mulch and tackifier, geo-textiles, plastic covers and erosion control blankets/mats, temporary or permanent vegetation.</p>
		Page 18 C.2	<p>Un acceptable and should be deleted.</p> <p>It is cost prohibitive and impractical to cover all active areas. The main concerns are during rainy season and or windy days and maintaining good house keeping especially during home building/vertical construction. Training of trade partners should be part of documentation in the SWPPP.</p> <p><b>Recommend the following Language:</b></p> <p>The discharger shall provide at a minimum an appropriate sediment</p>

			control measures (such as silt fence, fiber rolls, gravel bag check dams, storm drain protection or other appropriate effective measures) for all active disturbed areas. In addition, store BMP materials at a designated area to be used as an emergency or for prior to predicted rain event or windy days or for other necessary repairs or replacement.
		C.3	acceptable
		C.4	Describe example of stabilize methods for finished slopes....
8	Permit Section IX E For areas under active construction, the discharger shall implement erosion control BMPs.....in conjunction with sediment control	E.3	Un acceptable. See comment on C.2 above.
9	Permit Section IX G Active Treatment System	Page 19	<p>ATS treatment system may need low thresh hold NPDES permit from water board which sometime takes longer then 30 days to obtain. The numeric Value is too costly. Most of the construction project are not too close to receiving water body, thus such restrictive number may not be necessary. It makes more sense to emphasize erosion/source control then using ATS system. It is much cost effective to minimize sediment mobilization using effective erosion control measures then to treat dislodged sediment.</p> <p>According to <b>Rain for Rent</b> company specializing in dewatering system, the initial installation cost for 10NTU is about \$25,000 to \$30,000 (based on 300 gpm, piping, tank, flocculent such as chiteson, filtration units) and it does not include monitoring system, monthly rental cost of equipment or additional above ground tank. For 50 NTU the estimated cost is about \$16,000 to \$ 20,000.</p> <p><b>Recommend 50 NTU as average daily number instead of 10 NTU; This will have minimal effect on water quality of receiving water.</b></p> <p><b>pH differences should be consistent with the Regional Board Basin Plan Requirements</b></p>

		Page 19 Section G.1	The last sentence .....with source control procedures described in Section VIII G. Does it mean Section H
10	Storm Water Pollution Prevention Plan Section X A. SWPPP Preparation, Implementation and oversight	Page 26 Section X A	Acceptable. <b>Recommend add one more certifications or qualification:</b> SWPPP Developers shall have an engineering or environmental Science Degree with accredited University, a <b>minimum of 5 years</b> experience in storm water regulations, field experience and have prepared at a minimum 10 approved SWPPP.
10	Rain Event Action Plan (REAP) Section XI	Page 28 XI. 1	Acceptable, however, 30% threshold is impractical since it does happen often but does not materialize actual rain events. Also REAP should include type of information in the document.  <b>Recommendation:</b> <b>The third sentence should read: A likely precipitation event is any weather pattern forecasted to have a 50 % or greater chance of precipitation. At a minimum 48 hours before the predicted 50 % chance of rain event, the REAP for the project shall be implemented to ensure that the site's BMPs are effective in minimizing and or abating potential pollutants discharge. The discharger shall obtain .....</b>
		XI 5.	<b>Recommend the following Language:</b>  The REAP Plan shall include inspection and BMPs maintenance procedures. Reap shall include the name of certified inspector, inspection form, reporting procedures to local and state storm water coordinator in the event of significant failure or discharge, an updated color coded site plan showing site conditions and BMPs implemented or proposed for the rainy season with time schedule.

			<p>Inspection: Designated certified person shall inspect the site 24 hours pre forecasted rain event, during an extended 24 hour rain event and post rain event. All inspection shall be performed during day light hours assuming it is safe.</p> <p>Maintenance: Any necessary maintenance and repair of existing BMPs discovered during the inspection shall be documented and carried out immediately during day light hours.</p>