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COUNTY OF HUMBOLDT

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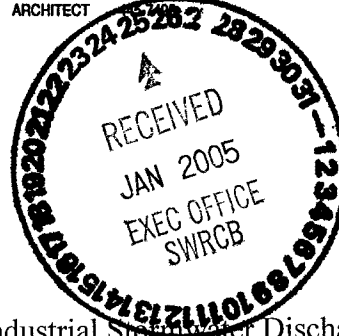
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20 January 2005

Ms. Debbie Irvin, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, California 95812-0100



SUBJECT: Comments on the draft Industrial Stormwater Discharge Permit

The Humboldt County Department of Public Works has reviewed the "State Water Resources Control Board (SWRCB) Water Quality Order No. 05-xx-DWQ National Pollutant Discharge Elimination System (NPDES) General Permit No. Cas000001. (General Permit) Waste Discharge Requirements (WDRs) for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities" and offers the following comments.

1. Fact Sheet, pg. VII, *Effluent Limitations* ¶ 3 States "*The benchmarks are generic and not intended to be numeric limits or protective of any particular receiving water.*" This statement appears to be in direct conflict with the following sections of the draft General Permit: "*When analytical results exceed the USEPA benchmark values in Table VIII.2 dischargers shall comply with the following requirements: i. Implement the procedures required in Section V.7., and ii. Collect and analyze samples in accordance with Section VIII.5.c from at least the next two consecutive qualifying storm events. This applies to all dischargers including participants in a group-monitoring plan. Dischargers shall continue sample collection and analysis until two consecutive samples result in no further exceedances of the USEPA benchmarks.*" Page 19, §VIII-f-ii." It appears that the first statement clearly states that the benchmark values are not intended to be "numeric limits". However the second statement located in the draft General Permit states that if the results of sampling exceed the benchmark values that the permittee shall "*continue sample collection and analysis until two consecutive samples result in no further exceedances of the USEPA benchmarks.*" It is difficult to understand how the benchmark values are not "numeric limitations". Please clarify.

2. Fact Sheet, pg. IV, Background ¶ 5, states *“In this General Permit, there is no reduction in sampling based on benchmark levels, and, if the discharges are above one or more of the benchmarks, the discharger must revise its SWPPP to improve BMPs and must sample the next two consecutive qualified storm events.”* Please justify this position. It is difficult to understand why a permittee should be required to continue sampling for a specific analyte after previous sampling efforts have indicated that the level of said analyte is below the “benchmark values”. If the reason for this is to collect data for the development numeric limitations, it does not seem appropriate for the permittees to shoulder this cost. Please explain.
3. Fact Sheet, pg. IV, Background ¶ 3, states, *“In addition, this General Permit also includes a requirement for a one-time suite of monitoring for metals, Chemical Oxygen Demand (COD), and semi-volatile organic compounds (SVOCs). The purpose for the monitoring of indicator parameters and industry-specific monitors is to evaluate the runoff from individual sites. The purpose for the metals, COD, and SVOC screening is to develop a database of the constituents of concern and the levels at which they are generally found in runoff. The SWRCB intends to use this database to develop numeric effluent limitations.”* It is understood that the results of this one-time monitoring event will be used in conjunction with the other annual sampling data to develop numeric effluent limitations. However it is not clear how analytical results from a “point in time” sample will be useful in developing numeric effluent limitations. It would seem that these “snap shot” values are not appropriate even when used in conjunction with the other annual sampling data. Please explain how the SWQCB intends to develop valid numeric effluent limitations from this one time monitoring event.

Please contact Adam Forbes at (707) 268-2680 with any questions.

Sincerely,



Adam Forbes
Environmental Services Manager
County of Humboldt, Department of Public Works

c. Supervisor Geist
Allen Campbell, Director
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