

SPECIAL HEARING

2/3/05

cc: BD, DI, DWQ

e-cys: BD, CC, HMS, TH, CMW



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State Water Resources Control Board
P.O. Box 100
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December 29, 2004

Re: Written Comments draft Industrial General Permit

To Whom It May Concern:

Here are my comments/concerns in regard to the draft General Storm Water Permit.

Section B.4e: Documentation of storm events that occur prior to completing each monthly visual inspection.

This will be an unnecessary burden for most businesses including ours. Most businesses do not have the staff to accomplish this. I have been observing storm water at our facilities now since the program started in 1992 and we see the same trends in the same locations. Adding more documentation does not and will not improve water quality.

Section B.4f: Visual observations before each storm event to located and correct areas of contamination.

Again this would be very burdensome to business. Here on the north coast this would mean an inspection would have to be done every 14 days to comply with this regulation. In my experience, you can see trends of water quality by doing one observation each month. Doing more observations will do nothing to improve water quality and will fill the files of the regional board with unnecessary paper work.

Section B.5.c.ii Additional parameters indicating the presence of industrial materials that are exposed to, and mobilized by, storm water.

This is a storm water program. There are lots of facilities that are covered under this General Permit. Most of them are not large enough to employ environmental experts. The parameters we currently have are enough to show a trend. From these basic parameters you can use good old common sense and eye sight to

detect storm waters coming in contact with materials that generate pollutants.
Don't make your program into science project!

V. Provisions Section 11 a. Causing or contributing to an exceedance of a WQS.

There should be no specific effluent discharge limits for the storm water program as samples are taken during the first hour of discharge during the first event. We all know this is the best time for pollutants to transport and really doesn't reflect a true pollutant load over the course of a storm event. It would be much fairer program if you took the first sample during the first hour of discharge on the first event then took the second sample after two or three days of continuous flow. If you did the sampling this way you could probably get a good average and make an educated decision about causing or contributing to an exceedance of WQS.

Section E # 15 Penalties for Violations

\$25,000 per day for court imposed fines and \$10,000 per day administrative penalties is significant and in most cases not justified. Section E #15 should probably say administrative penalties of \$1000 per day by a regional board only. Citizen lawsuits could be a problem if the language is kept as is.

Storm Water Pollution Prevention Checklist

This checklist should help the smaller business who can not afford to send employees to storm water seminars. It will be old hat to folks who have been updating their training and implementing the most up to date BMP's.

I hope these comments are beneficial. look forward to the upcoming meeting and discussions in Sacramento.

Sincerely,



Rob Ricci
Environmental Manger
Simpson Timber Company Cal. Ops.