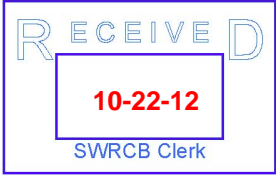




# Ventura Countywide Stormwater Quality Management Program

#94



Participating Agencies

Camarillo

October 22, 2012

County of Ventura

Fillmore

Attn. Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento CA 95814

Moorpark

**Subject: COMMENTS ON THE JULY 2012 DRAFT INDUSTRIAL  
GENERAL PERMIT**

Ojai

Dear Ms. Townsend:

Oxnard

The Ventura Countywide Stormwater Quality Management Program (Program) appreciates the opportunity to provide comments on the July 2012 draft Industrial General Permit (IGP). The Program includes the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, Thousand Oaks, the County of Ventura, and the Ventura County Watershed Protection District who are under a Municipal Separate Storm Sewer System (MS4) Permit issued by the Los Angeles Regional Water Quality Control Board (Regional Water Board). The Permit requires us to implement an industrial and commercial business program that includes inspection of facilities regulated under the IGP.

Port Hueneme

San Buenaventura

Santa Paula

Simi Valley

The comments in this letter are focused on the areas of the IGP that overlap with the MS4 permit's TMDL and Industrial Commercial Business program elements. In addition to the comments identified in this letter, the Program supports the comments of the California Stormwater Quality Association.

Thousand Oaks

Ventura County  
Watershed Protection  
District



**1 Light Industries and No Exposure Certification (NEC)**

Thirty thousand light industry facilities are expected to be brought into the industrial stormwater program under Section XVII of the draft IGP that requires Dischargers with no exposure of industrial materials to register for an NEC. Based on the fees proposed in the IGP, the State will collect more than \$7,000,000<sup>1</sup> in stormwater fee revenue from these facilities not currently in the stormwater program. Light industries, for the most part, have not been regulated by the Industrial General Permit and may not be aware of the new requirements. The visit from the local MS4 stormwater inspector may be the first notice these facilities have of the new requirements. The Program does not want to carry the burden to educate the light industry community of the pending changes.

*The Program requests the State Water Board use a portion of these new revenues to undertake a proactive campaign to inform and educate them of the new IGP and its requirements.*

**2 Total Maximum Daily Loads (TMDLs)**

Section VII of the draft IGP identifies the process by which TMDL-specific enforceable provisions will be incorporated into the IGP. As with municipal stormwater discharges, the Program believes that all the TMDL waste load allocations (WLAs) incorporated into stormwater permits should be implemented as Best Management Practices (BMPs), and requests that the State Water Board recognize BMP based compliance in the IGP.

*The Program requests the State Water Board recognize BMP based compliance in the IGP findings and recommends the addition of the following language into or following Finding No. 39:*

*Compliance may include, but is not limited to, implementation of BMPs and control measures contained in TMDL implementation plans sufficient to achieve the WLA, or a demonstration that the numeric WLA has been achieved.*

**3 TMDLs Missing from Attachment D**

The Program would like to call to your attention to several TMDLs missing from Attachment D. These TMDLs, issued for waterbodies within Ventura County, have WLAs and implementation requirements that identify the IGP as the regulatory implementation mechanism:

- Santa Clara River Estuary and Reaches 3, 5, 6, and 7 – Indicator Bacteria
- Ventura River Algae, Eutrophic Conditions and Nutrients (currently under development)
- Santa Monica Bay Nearshore and Offshore Debris TMDL (SMB Marine Debris TMDL)

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<sup>1</sup> Per IGP Attachment C the NEC fee will be assessed at \$242/facility and NOI fees will be \$1,342/facility. The \$7 million estimate is based on ~30,000 facilities registering and paying the NEC fee.

Ms. Jeanine Townsend  
October 22, 2012  
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- Calleguas Creek and Mugu Lagoon – Metals and Selenium
- Calleguas Creek – Boron, Chloride, Sulfate and TDS (salts)

*The Program requests that Appendix D be revised to include the TMDLs listed above.*

Thank you for your time to consider these issues. If you have any questions regarding these comments please contact me at (805) 654-5051.

Sincerely,



Gerhardt J. Hubner, Chair  
Ventura Countywide Stormwater Quality Program

cc: Ventura County Stormwater Quality Management Committee