

commentletters**Public Comment**
Draft Construction Permit
Deadline: 6/11/08 by 12 p.m.

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To: <commentletters@waterboards.ca.gov>
Date: Friday, May 02, 2008 10:47 AM

To whom it may concern,

My name is Ted Honcharik 951 233 0283. I have been reading the new construction permit and can not find a good BMP for concrete washout.

Throughout the preliminary permit it seems that ph level is a major concern. Harden concrete, mortar, fly ash, etc. is not the major problem, concrete washout wastewater is. If you look at some of the pictures attached you we see this is a much bigger problem than you might have thought. If a construction site is allowed to just dig a hole, and there is no tracking of disposal of this high ph (12plus) and high in hexavalent chromium waste water, we accomplish nothing!

If you look at the containers used in the attached hospital concrete pour you we see how it should always be done. Thousands of gallons of this wastewater was pumped out of the containers and disposed of at a water treatment plant. If they were not thinking GREEN all this waste water would have been dumped on the ground. This goes for small and large jobs. We must understand that each cement truck uses about 10 gallons of fresh water to washout his shut after each pour. And there is nothing stopping him from using more water. Just ten cement trucks will generate over 100 gallons of high ph(12plus) and high hexavalent chromium wastewater. There is no other liquid waste that comes close to this amount being dumped on the ground at construction sites. We must track where all this waste water is going!

Sometimes one site over the entire construction period my pour over 50,000 yards of concrete, and without stronger controls over this wastewater, this means over 50,000 gallons of this highly toxic wastewater ends up on the ground and sometimes in one concentrated spot. Although this large pour may take place over six months at this one site, it is no different than 6 large gasoline tanker trucks showing up at one time and dumping all their liquid at once.

