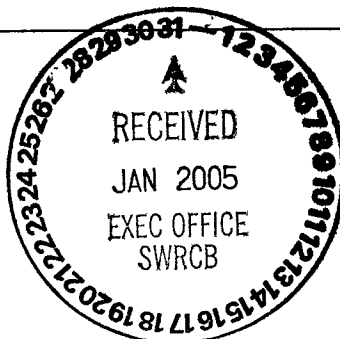


Office of State Publishing

Memorandum

Date: January 28, 2005



SPECIAL HEARING
2/3/05

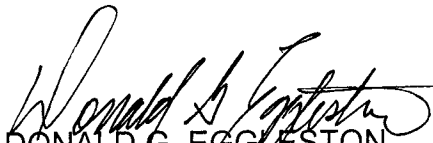
cc: BD, DI, DWQ
E-Cys: BD, CC, HMS, TH, CMW

To: 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

From: Department of General Services
Office of State Publishing

Subject: Draft – Industrial General Storm Water Permit

Enclosed, please find our comments and questions regarding the proposed Water Quality Order No. 05-XX-DWQ. Please contact me at (916) 327-4174 if you have any questions concerning this submittal.



DONALD G. EGGLESTON
Environmental Coordinator

Enclosure

Reviewer Comments

Draft Water Quality Order No. 05-XX-DWQ

1. SUMMARY:

It appears that the best management practices (BMP's) in the storm water pollution prevention plan (SWPPP) are the key factors regarding compliance with water quality standards and EPA benchmarks. Therefore, it should be possible to maintain compliant storm water discharges without as many of the sampling, inspection, and observation procedures in the proposed permit draft if the BMP's are effectively constructed and dutifully followed.

The Office of State Publishing (OSP) believes that inspections in addition to the annual SWPPP review are unnecessary because BMP's in the SWPPP are essentially in use and scrutinized during day-to-day operations. OSP sees no practical purpose for observing and documenting storm events or inspecting the facility prior to storm events because the BMP's, if followed, will render these activities moot. Subsequent sampling events during a season are questionable as long as no standards or benchmarks are exceeded in the first event samples.

2. SPECIFIC COMMENTS AND QUESTIONS:

a. Section-II, paragraph-3 states that BAT and BCT shall be used for storm water and authorized non-storm water discharges. The OSP facility was constructed so that storm water and well water to cool the plant are channeled into a single discharge. The well water used to cool the facility is contaminated by halogenated hydrocarbons that migrate into the water from off-site locations. OSP has a permit and waste discharge restrictions for this non-storm water discharge. Will BCT be added to this discharge as a result of a storm water permit? A potential conflict exists between permits.

b. Section-VII, paragraph-8, viii, requires at least four quarterly visual inspections of the facility. With appropriate BMP's in place, these inspections may not serve any practical purpose because the activities covered in the BMP's are ongoing and continuously monitored. Any problems or modifications must be addressed immediately, thus precluding a need for separate inspection.

c. Section-VIII, paragraph-3a states that visual observations shall be made from all discharge locations. What is the definition of a "discharge location"? At the OSP facility, storm water and any cooling well water collects in a large sump on OSP's property and is later pumped via pipeline off-site to the American River on county property. Are both locations considered to be discharges for the purpose of the referenced section?

d. Section-VIII, paragraph-3a states that visual observation shall be made during the first qualifying storm of each month during the storm season. Since sampling is conducted during the first qualifying storm, no further observations should be necessary if the sample analysis indicates compliance with standards and benchmarks.

e. Section-VIII, paragraph-3e states that discharges shall record storm events that did not produce a discharge. This does not seem practical because actual discharges are the issue.

f. Section-VIII, paragraph-4a states that samples shall be collected from the first two qualifying events of the season, and that all discharge locations shall be sampled. The second set of samples should not be required as long as analytical results from the first set show compliance with standards and benchmarks.

g. Section-VIII, paragraph-4c,i, states that samples shall be analyzed for TSS, pH, specific conductance, TOC or Oil and Grease. With the exception of TOC or oil and grease, OSP's existing NPDES permit for non-storm water discharge already requires monitoring of these analytes. Since the storm water and non-storm water are inseparable, would this requirement be waived for the storm water permit?

h. Section-VIII, paragraph-4c,i, states that samples shall be analyzed for TSS, pH, specific conductance, TOC or Oil and Grease. For several years, OSP was required to monitor the co-mingled discharge for oil and grease on a monthly basis. Oil and grease was never detected, and the requirement was subsequently dropped as a permit requirement. Waivers for certain pollutants should be available in the permit if evidence warrants.

i. Section-VIII, paragraph-4f defines procedures to follow when any EPA benchmark values are exceeded. Specific conductance from our cooling water well is consistently greater than the benchmark value. We cannot separate this water from our storm water and we do not treat the well water in any way. Provisions should be available in the storm water permit to allow for this situation.

j. Section-VIII, paragraph-6b list analytes which must be sampled at least once. The permit should allow waivers if the discharger has sampled under the California Toxics Rule or other previous requirement for the same analytes.

k. Section-VIII, paragraph-7, et al, requires observation and sample collection from "all drainage areas associated with industrial activity". What is the definition of a "drainage area"?