



COUNTY OF PLACER
FACILITY SERVICES DEPARTMENT

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Public Comment
Industrial General Permit
Deadline: 10/22/12 by 12 noon

#30

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October 22, 2012

Via email: stormwater@waterboards.ca.gov

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, Sacramento, CA 95814



RE: 2012 DRAFT NPDES GENERAL PERMIT FOR THE DISCHARGE OF STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES

Dear Ms. Townsend:

Placer County (County) appreciates the opportunity to comment on the State Water Quality Control Board's (Board) 2012 Draft National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Storm Water associated with Industrial Activities (Draft Permit).

The County owns, operates and maintains five wastewater treatment facilities, 44 wastewater lift stations and several solid waste facilities, including the Eastern Regional Landfill and Material Recovery Facility in the Tahoe area, transfer stations in Meadow Vista and Foresthill, as well as closed landfills in Loomis, Meadow Vista and Foresthill. The County also provides administrative support and management to the Western Placer Waste Management Authority, which owns and operates the Western Regional Sanitary Landfill and Materials Recovery Facility in Roseville. Several of these facilities have coverage under the current Industrial Storm Water General Permit.

While we appreciate your Board's efforts to address certain issues associated with the existing Permit and improve stormwater quality, the County is concerned about the increased costs, efforts, and staff certifications as a result of the proposed requirements. In general, impacts to our facilities would include additional costs associated with Stormwater Pollution Prevention Plan (SWPPP) development, storm water sampling and analysis, and reporting. Additional expense will also be incurred to hire or train additional staff as Qualified SWPPP Practitioners and / or Developers. Finally, some areas of the Draft Permit are vague and require clarification.

Specific comments on the Draft Permit language are as follows:

- 1) The Draft Permit states that Level 1 or Level 2 Status Dischargers may return to Baseline Status after eight consecutive Qualifying Storm Events (QSEs) resulting in no additional NAL exceedances. Industrial facilities in this region may experience fewer than eight storm events per year that produce a discharge from the site. As such, it is likely that it would take multiple years to return to Baseline Status. Significant additional expense will be incurred with this long term monitoring when a shorter term may provide sufficient documentation that the issue has been addressed.

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Entrance at 2855 2nd Street

1 **Recommendation:** Amend the IGP to state that Level 1 or Level 2 Status Dischargers may return to Baseline Status after *four* consecutive QSEs resulting in no additional NAL exceedances.

- 2) Regarding landfill point source category facilities (Federal Regulation Part 445) subject to Federal storm water Effluent Limitation Guidelines (ELGs) and New Source Performance Standards (NSPSs), the Draft Permit is unclear regarding what specific landfill activities and/or scenarios would, and would not, require a facility to be subject to the ELGs and NSPSs. Example scenarios: If all rainfall contacting an open waste cell is captured in the leachate system (which is discharged to the sewer system) and if all gas condensate, drained free liquids, and contact washwater are also collected and discharged to the sewer system, would the facility be subject to the ELGs and NSPSs? If so, which specific activity causes the facility to be subject to them?

2 **Recommendation:** The Draft Permit should clarify landfill activities and/or scenarios that would, and would not, require a facility to be subject to the ELGs and NSPSs.

- 3) Regarding high natural background levels of pollutants, the Draft Permit fact sheet states that "Dischargers who submit a Natural Background Demonstration Technical Report are "not responsible" for the naturally occurring pollutants identified in the Natural Background Demonstration Technical Report". However, the Draft Permit is unclear for which requirements (e.g. sampling, reporting, analysis and/or exceedances) related to the naturally occurring pollutants the discharger is not responsible.

3 **Recommendation:** The Draft Permit should clarify which requirements, related to naturally occurring pollutants included in an accepted Natural Background Demonstration Technical Report the discharger would not be responsible for.

- 4) The Draft Permit is unclear regarding what facilities would not be considered "Plastics Facilities". Pursuant to phone conversations with Board staff, we understand that bulk plastic storage and sorting facilities, such as solid waste transfer stations and materials recovery facilities (MRFs), are not considered "Plastic Facilities".

4 **Recommendation:** The Draft Permit should clarify and define that solid waste transfer stations and MRFs are not considered "Plastics Facilities".

- 5) The Draft Permit defines the QSE as "a storm event that has produced a minimum of 1/10 inch of rainfall..." This minimum storm threshold is inappropriate and excessive for the following reasons:
- Environmental Impacts: Rainfall intensity is directly proportional to environmental impacts associated with storm water discharges. Daily rainfall totals between 1/10 inch and 1/2 inch of rain generally have very low rainfall intensities and therefore have very low potential to impact the environment.
 - Economic Impacts: Since the Draft Permit requires pre-storm visual inspections, sampling and reporting (if a discharge is observed), defining the QSE as 1/10 inch of rainfall would result in significantly more visual inspections, sampling and reporting that would have significant associated cost impacts without a proportionate improvement to storm water quality.

- Consistency with General Construction Storm Water Permit: The current General Construction Storm Water Permit defines the QSE as 1/2 inch of rainfall in a 24-hour period.

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Recommendation: The Draft Permit should include a more reasonable threshold for a QSE, such as the 1/2 inch rainfall in a 24-hour period defined in the General Construction Storm Water Permit. In addition, the Draft Permit should maintain the current annual reporting requirement for analytical results.

- 6) Section XI. Table 2: The Draft Permit authorizes a Qualified Industrial SWPPP Practitioner (QISP) to develop SWPPPs. This is in contrast to the current Construction General Permit which authorizes a Qualified Stormwater Developer (QSD) to develop SWPPPs.

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Recommendation: Consistent with the Construction General Permit, a QISD should be authorized to develop SWPPPs.

- 7) Section XI. Table 2: It is not clear what roles are authorized to develop SWPPP amendments.

Recommendation: A QISD should be authorized to develop SWPPP amendments.

- 8) As proposed, the Draft Permit requires that a QISD or QISP perform annual, quarterly, weekly and storm based inspections. Currently, many of these tasks are conducted by technician level staff and hiring additional QISD or QISPs or training and certifying current technicians would have a significant economic impact.

Recommendation: Allow a QISD or QISP to train in-house engineering technicians to perform the work of a QISP. To ensure quality control, inspections and reports could be reviewed and signed / certified for accuracy by the QISD / QISP.

Placer County appreciates your consideration of our comments.

Sincerely,



Bill Zimmerman, P.E.
Deputy Director

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