



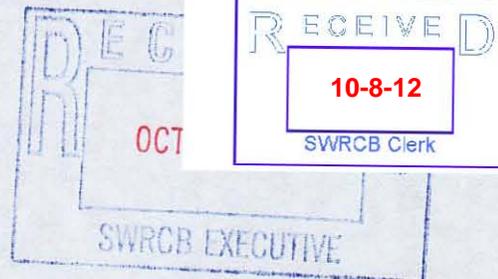
National Nuclear Security Administration
Sandia Site Office
P. O. Box 5400
Albuquerque, NM 87185

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



OCT 04 2012

#66



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

Subject: Comments from Department of Energy, National Nuclear Security Administration, Sandia Site Office on the Draft Industrial General Permit for Storm Water Discharges

Dear State Water Resources Control Board:

Thank you for the opportunity to provide comments on the Draft National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities (Order No. NPDES No. CAS000001).

Sandia National Laboratories/California (SNL/CA) lies on property owned by the Department of Energy (DOE) and operated by Sandia Corporation. Individual buildings at the facility vary in age from relatively new to more than 50 years old. SNL/CA was established more than 50 years ago and has significant scientific infrastructure that supports national priorities. Given SNL/CA's mission and history, our facilities have tended to be situated in less developed areas that include natural vegetation landscapes with some steep slopes discharging to Arroyo Seco. As a result, our facility is not a typical industrial discharger.

We appreciate the effort required to draft a permit designed to apply to such a broad spectrum of activities and facilities. We also support the effort to protect and improve storm water quality in California. We believe that some sections of the draft permit require clarification, and that such clarification will ensure that the permit is implemented in a consistent manner throughout the State.

1 **Comment 1: Clarification of the term "Storm Water Associated with Industrial Activity."**

Section XI B.1 of the draft permit states, "Dischargers shall ensure that collection of storm water samples are made at all locations that discharge storm water associated with industrial activity...".

The SNL/CA campus has several outfalls into the Arroyo Seco. Some of these outfalls may drain non-industrial areas such as parking lots or office buildings, while other outfalls may drain industrial areas such as vehicle maintenance, scrap yards, etc.

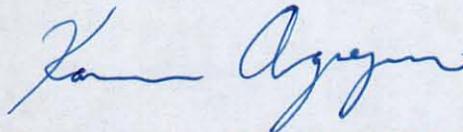
Please clarify if outfalls from drainage areas that do not contain industrial activities need to be sampled.

2 **Comment 2: Clarification of No Exposure Certification for Specific Areas of a Facility.**

Section XVII D.1 of the draft permit states, "Any drainage areas on that facility that would otherwise qualify for NEC coverage may be specifically addressed in the facility SWPPP by including an NEC checklist and certification statement...".

If a specific facility at SNL/CA can certify that an industrial activity at that site (such as a Treatment Storage or Disposal Facility) meets the No Exposure Certification (NEC) requirements, can the additional analytical parameters (contained in Table 4) triggered by the presence of that facility be dropped from analyses required by Section XI B.5.b? Please clarify.

Sincerely,



Karen Agogino, P.E. (CA & NM)
Water Quality Program Manager
Environment, Safety, and Health

cc:

Robert Holland, SNL/CA, MS-9902
Gary Shamber, SNL/CA, MS-9902
John Garcia, SNL/CA, MS-9956
Amy Blumberg, SNL/NM, MS-0141
Cynthia Wimberley, SSO/Legal, MS-0184
Shirley Mondy, SSO/ESH, MS-0184
Susan Lacy, SSO/ESH, MS-0184
Karen Agogino, SSO/ESH, MS-0184
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