



COUNTY OF PLACER FACILITY SERVICES DEPARTMENT

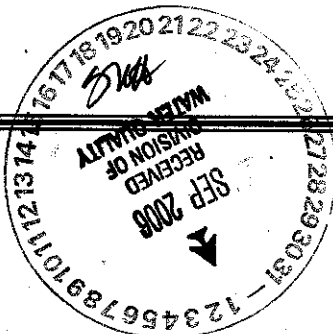
Phone 530-886-4900 Fax 530-889-6809

www.placer.ca.gov

JAMES DURFEE, DIRECTOR
MARY DIETRICH, ASSISTANT DIRECTOR
ALBERT RICHIE, DEPUTY DIRECTOR
WILL DICKINSON, DEPUTY DIRECTOR

August 28, 2006

State Water Board
P.O. Box 100
Sacramento, CA 95812-0100



Storm Water Panel Report
Deadline: 9/1/06 5pm

Subject: Comment Letter – Storm Water Panel Report

To Whom It May Concern:

Thank you for the opportunity to comment on the recent Storm Water Panel's findings and recommendations to improve the National Pollutant Discharge Elimination System Storm Water Program. Placer County's Solid Waste Management Division is responsible for industrial storm water permits for four closed landfills, one active landfill, two solid waste transfer stations and two material recovery facilities.

Staff attended the public workshop held on July 21, 2006 in Sacramento. We agree with many of the comments presented by industry representatives, particularly those listed below:

- **Enforcement** – At the public workshop, testimony indicated that there is little to no enforcement of the current requirements. Therefore, the Board should consider addressing the facilities that are non-compliant. Otherwise, the addition of new and more stringent requirements will primarily affect those that are already complying and will not address the more urgent problem – non-compliance.
- **The Existing Program Works** – For those who comply, the existing program works. At our facilities, we implement Best Management Practices (BMP) and sample according to our requirements. At one of our sites, we exceeded a benchmark and thus made appropriate changes to our BMPs. Subsequent sample results were below the benchmark for that constituent.

Improving the program (e.g. increased enforcement or improved BMPs) would be a cost-effective approach and would likely result in significant improvements. One speaker at the workshop compared this approach to the evolution of low-emission vehicles: The zero-emission vehicles were too expensive to be widely implemented or successful, but hybrids have nearly the same efficiency, are a fraction of the cost, and are achieving the desired results. Before moving forward with the difficult and costly effort to establish numeric limits, the Board should consider improving the existing program first.

11476 C Avenue Auburn CA 95603
Entrance at 2855 2nd Street

Administration – Building Maintenance – Capital Improvements – Museums – Parks
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- **Background Levels** – Some sites have background levels above the existing EPA benchmarks. The Board should take background levels into consideration when establishing levels of compliance.
- **Action Levels** – We agree that Action Levels are a good concept in general. Where sufficient data exists, we support Action Levels being established to identify “bad actors” and/or used as triggers for BMP review, not as numeric limits.
- **Design Storm Criteria** – Design storm criteria are necessary for BMP design and for instances when a site can no longer contain or manage excess storm water. If sites will be required to comply with a numeric level, design storm criteria should be specified. For example, Action Levels could be applicable for a 10-year storm event or less.

Thank you for the opportunity to respond. If you have any questions, please feel free to call me at 530-886-4965.



Chris Hanson
Environmental Resource Specialist

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