

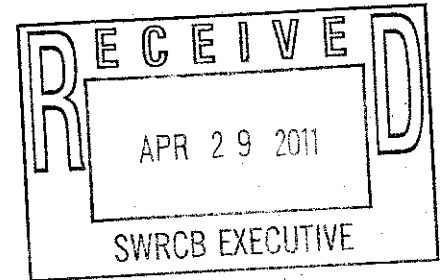
Internal Services Agency

Department of General Services  
Michael M. Morse, Director



County of  
Sacramento

Steven C. Szalay, Interim County Executive  
David Villanueva, Agency Administrator



April 28, 2011

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

**SUBJECT: Comment Letter – Draft Industrial General Permit**

Dear Ms. Townsend,

The County of Sacramento (County), Department of General Services appreciates the opportunity to submit the following comments on the draft proposal for the Industrial General Permit. The County operates a vehicle maintenance shop covered by the current Industrial General Permit.

Qualified SWPPP (Storm Water Pollution Prevention Plan) Developer (QSD) and Qualified SWPPP Practitioner (QSP) and registrations for QSD as per I. General Findings, G. Training, Section (50) and (51), IV. Non-Storm Water Discharges, B. SWPPP Certification Requirements, B, Section 1

The proposed permit will require the appointment of two positions. Both must be trained by the State and Regional Water Boards Industrial General Permit Training Team and one must have a formal registration or certification.

*Comments:*

The proposed permit will most certainly require dischargers to obtain the services of a professional engineer or other certified person to develop a SWPPP. The additional costs associated with contracting a QSD/QSP conflicts with Best Available Technology Economically Achievable (BAT) standards. A technology is the use of any technical method to achieve a desired result. The proposed language will no longer allow dischargers to apply their own individual technical methods within their achievable economic abilities.

The use of a certified person does not assure an improved SWPPP. The County does not believe it is necessary for a SWPPP to be written or updated by a certified person when no engineering work or calculations are required or when the developer may have extensive knowledge of storm water regulations and practices. The County is also concerned that a certified person may require engineering practices and methods beyond what is necessary when an equally effective and more practical solution can be found. In reference to I. General Findings, G. Training, Section (51), the Professional Engineers Act should be regulated by the implementing agency not the State Water Board.

If training and an exam is required by the Industrial General Permit Training Team, the training course should be provided at no cost to the discharger. Other agencies such as the Air Resources Board and the Department of Toxic Substances Control provide courses and training at no charge to the regulated community.

VII. Training Qualifications and Certification, H. Best Management Practices (1)(i), (b)(ii) and (d)(v), IX. Monitoring Requirements, (C)(6) and X. Sampling and Analysis Requirements, (C)

The proposed permit will require daily and weekly inspections and inspections prior to anticipated storm events. The permit will also require two additional sampling events.

*Comments:*

Any additional inspections and monitoring will require further resources and place an economic burden on the County. The County has demonstrated to be in compliance with the current Industrial General Permit requirements and has had minimal to no exceedances. The County feels additional inspections and monitoring is unnecessary and may not contribute to the improvement of storm water quality.

XI. Sample Analysis and Reporting

As proposed, field measurements is required for certain parameters.

*Comments:*

Field measurements will require either the services of a consultant or purchase of a meter. Both options will require additional funding. Furthermore, field meters may be less accurate than lab test methods due to calibration and reliability issues in the field.

Conclusion

If the draft Industrial General Permit is adopted as proposed, the new permit will place an additional financial burden on the regulated community and provide little or no benefit to storm water quality. Requiring formal certifications, additional inspections and monitoring is unnecessary and may not further reduce or eliminate pollutants for facilities already in compliance with minimal to no exceedances. The County does suggest the State Water Board provide regular training and outreach to the regulated community and more oversight for non-compliant facilities and facilities with high exceedances.

Thank you for your consideration. If you have any questions or comments, please contact me at 916-876-6187 or [carneyk@saccounty.net](mailto:carneyk@saccounty.net).

Sincerely,



Karen C. Carney  
Environmental Specialist

copy: Michael M. Morse, Director  
Jeff Gasaway, Deputy Director  
Dave Casey, Bradshaw District Manager  
Marc Gillmore, Facilities Planning Manager