



September 13, 2013

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



Submitted via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Subject: Comment Letter - Industrial General Permit

Dear Ms. Townsend,

The Port of San Diego (Port) respectfully submits this comment letter on the 2013 Draft National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Storm Water Associated with Industrial Activities, Order Number CAS 000001 (Draft Industrial Permit).

The Port commends the efforts of the State Water Resources Control Board (State Water Board) to consider stakeholder input on the Draft Industrial Permit. The actions taken by the State Water Board to consider and incorporate our previous comments into the revised draft are appreciated. We also appreciate this opportunity to provide comments on this most recent Draft Industrial Permit. The Port has specific comments on the No Exposure Certification requirements of the Draft Industrial Permit as follows:

In most cases, light industrial facilities that do not have materials or activities that impact storm water, also do not employ a storm water specialist. Under the new proposal process, these facilities will be required to incur additional cost to train an employee on the NEC requirements or hire a specialist/consultant to conduct the annual inspection. This new requirement will increase cost and labor to light industrial facilities.

The Port supports the concept of requiring qualified persons to evaluate and certify that a facility has met the NEC coverage. However, the Port requests a simplified NEC process that would provide coverage once for the entire permit cycle, without annual re-certification.

On behalf of the Port, I want to thank you for providing us the opportunity to engage with you and the other stakeholders through the public workshops, and the ability to submit comments on the Draft Industrial Permit. Please contact Damon LaCasella at (619) 686-6534 or [dlacasel@portofsandiego.org](mailto:dlacasel@portofsandiego.org) if you have any questions or would like additional clarification on the information provided.

Sincerely,

A handwritten signature in blue ink that reads "Jason Giffen".

Jason Giffen  
Director, Environmental & Land Use Management  
San Diego Unified Port District

DM# 595563 - cc: Jason H. Giffen, Karen Holman, Allison Vosskuhler, Damon LaCasella