

**From:** Art Deicke <adeicke@advgeoenv.com>  
**To:** 'Michael Adackapara' <madackapara@waterboards.ca.gov>  
**CC:** Bob Marty <rmarty@advgeoenv.com>  
**Date:** 4/18/2011 11:58 AM  
**Subject:** Comment for Sector-Specific General Permit for SW Run-off (Order No. R8-2011-0011)

Mr. Adackapara,

Please accept our comments to Regional Board 8's draft Sector-Specific General Permit for Storm Water Run-off Associated with Industrial Activities from Metals and Wastes Recycling Facilities (Scrap Metal Facilities) within the Santa Ana Region (Order No. R8-2011-0011, NPDES No. CAG 618001).

Our main concern is that the draft Sector-Specific GP appears to be preceding the State Water Board's adoption of the draft NPDES GP for Storm Water Discharges Associated with Industrial Activities (Order No. not assigned, NPDES No. CAS000001) or draft IGP.

At the SWB hearing on the draft IGP on 29 March 2011, numerous public comment were made, including introduction of Region 8's draft Sector-Specific GP. Many of the components of the draft IGP are undecided. Board Member Doduc has requested information on eight broad areas of the draft IGP, while Board Chairman Hoppin told his staff that the next edition of the draft IGP should not have as many unanswered questions as the first edition has. Clearly, there is more work to be done on the draft IGP, which the SWB indicates will require up to a year and possibly more.

The authority for a Regional Board to issue permits to categories of dischargers, which the draft Sector-Specific GP is. Sector-Specific GPs are a good idea and this is one of the eight areas Board Member Doduc requested additional information. However, it seems the proverbial cart is getting ahead of the horse as there are numerous areas of basic requirements where the draft IGP and draft Sector-Specific GP differ.

Here are just a few very of the areas:

QAMP, QAMP, REAP and SWAMP are not mentioned in the draft IGP, but are strict requirements in the draft Sector-Specific GP.

The reporting period differs from June 30 to July 1 in the draft IGP to January 1 to December 31 in the draft Sector-Specific GP.

Basic parameters are TSS, pH, SC and O&G in the draft IGP while turbidity is substituted for TSS in the draft Sector-Specific GP.

Reduction in monitoring programs differ.

G-SIRT is available in the draft IGP, but not in the draft Sector-Specific GP.

Treatment BMPs design storm events differ.

QSP/QSD qualifications are different.

The CTR/NTR compliance issues are handled differently.

Group monitoring program is addressed differently.

Dry weather event definitions do not appear in the draft Sector-Specific GP.

Rain gauge requirements are different.

NELs/NALs are different.

Tiered program for NEL/NAL with draft IGP as compared to Phase program with draft Sector-Specific GP.

Receiving water/basin plan issues appear to be addressed differently.

Annual Reports have different due dates.

And, there are many more areas

The draft Sector-Specific GP appears to have many of its components tied to the Construction GP. The QSP/QSD required courses of instruction are very specific to the CPG. As a matter of fact, the exam for the both the QSP and QSD is based upon the CGP, which a copy is provided to each examinee during the exam as a reference document. The QSP/QSD course and exam will probably be based upon the IGP, which will contradict with the draft Sector-Specific GP in its current form. I can see Region 8 developing its own QSP/QSD course of instruction and examination.

Finally, we recommend the draft Sector-Specific GP be based upon the IGP, once adopted. And the IGP be based upon the CGP wherever possible. We should be making this simpler not more complicated.

PLEASE WAIT UNTIL THE SWB IGP IS FINALIZED BEFORE ADOPTING THE SECTOR-SPECIFIC GP.

Sincerely,

Arthur Deicke

Advanced GeoEnvironmental, Inc.  
Stockton • Santa Rosa • Monterey • Brea • Spokane • Reno

1-800-511-9300  
adeicke@advgeoenv.com  
www.advgeoenv.com <blocked::blocked::http://www.advgeoenv.com/>

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution of this email/fax is prohibited. If you are not the intended recipient, please contact the sender by email/fax and destroy all paper and electronic copies of the original message.