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Submitted Electronically to: commentsletters@waterboards.ca.gov

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Attn: Ms. Selica Potter
Acting Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Atmospheric
Workshop: 2/9/06

Subject: Comment Letter – Atmospheric Deposition and Water Quality

Dear State Water Resources Control Board Members:

The Sempra Energy Utilities, Southern California Gas Company (SoCalGas) and San Diego Gas and Electric (SDG&E), herein submit comments in response to the scheduled workshop to receive information regarding the relationship between atmospheric deposition and water quality. Specifically, SoCalGas and SDG&E are submitting comments regarding atmospheric deposition and its affect on industries' ability to comply with the State's water quality objectives, and more specifically, complying with the proposed changes to the General Industrial Activities Storm Water NPDES Permit (GIASP) as indicated in the released drafts.

The occurrence of atmospheric deposition, both wet deposition and dry deposition, can be a major concern and challenge to industrial facilities facing evermore stringent storm water quality regulations. As permits are moving towards obtaining water quality objectives through the implementation of numeric waste load allocations, benchmark values, and effluent limits, industrial facilities are increasingly finding it difficult to comply regardless of their actual contribution of pollutants to run-off leaving their facility. Atmospheric deposition poses an unpredictable and uncontrollable risk to compliance because, in its very nature, it is unpredictable and uncontrollable.

Mostly obviously, the issue of wet deposition and acid rain is clearly outside the control of the discharger. Low pH rainwater contacting material that is normally used in the construction of physical structures, such as galvanized material and metal fencing, can cause the leaching of metals such as zinc. More seriously, the problem is beyond that of just the pH of rainwater, but the myriad of pollutants that can be transported in the precipitation itself, such as nutrients and metals.

However, dry deposition poses an equally challenging if not a greater issue to compliance. Specifically, for SoCalGas and SDG&E facilities, several sites are located directly adjacent to other industrial operations, such as concrete plants, asphalt plants, and landfills that cause direct dry deposition to its vicinity. Although all of our facilities are swept and maintained regularly, these particular facilities must constantly deal with the issue of the disposition of atmospheric particulates visibly accumulating on the site.

When dischargers must comply with effluent limitations that are down to the parts per million and parts per billion, the addition of pollutant concentrations from wet and dry deposition can have an enormous impact on a particular facility's ability to comply.

Although permitting an allowance for background levels may assist in evaluating a facility's actual contribution to pollutant loading, it is not always possible to locate an adequate background and/or upstream sampling location. Additionally, background sampling will increase monitoring costs to the facility multi-fold.

Therefore, it is the recommendation of SoCalGas and SDG&E to implement and enforce compliance through the use of minimum best management practices (BMPs) as opposed to numeric effluent limits. Requirements of permits imposed on industrial facilities should strictly address practices within the control of the facility. For example, all facilities requiring a storm water permit should be required to implement good housekeeping and good maintenance practices at all times.

It is our belief that each facility must be accountable for reducing their individual contribution of pollutants to storm water quality. However, challenges must be addressed and uncontrollable factors must be taken into account when deciding how to implement fair and effective regulations on the regulated community. We are hopeful that this discussion on atmospheric deposition yields a better understanding on how to approach the regulatory mechanisms used to achieve the overall goal of obtaining water quality objectives.

Thank you for your time and consideration of these comments. Please feel free to contact me at (213) 244-5812 if you have any questions or need further information.

Sincerely,

/S/

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