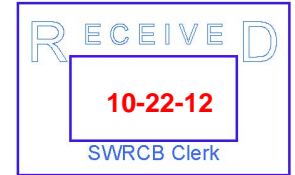




October 22, 2012

Mr. Charles R. Hoppin, Chair  
State Water Resources Control Board  
1001 I Street, 22nd Floor  
P.O. Box 100  
Sacramento, CA 95812-0100



**RE: DRAFT ORDER NO. CAS000001 – NPDES GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITIES (INDUSTRIAL PERMIT)- Third Draft**

Dear Mr. Hoppin:

The City of Santa Rosa wishes to thank you for the opportunity to comment on the Draft Industrial Storm Water Permit (Draft Permit). The City of Santa Rosa (City) qualifies for coverage under the Industrial Permit due to the bus servicing and hazardous waste handling activities that occur at its Municipal Service Center Corporation Yard. Additionally, the City's Laguna Wastewater Treatment Plant is covered under the general permit.

The City has reviewed the draft Industrial Permit and would like to present the following comments and concerns:

1. The City agrees with the findings of Blue Ribbon Panel that SIC codes are not sufficient to designate all industrial uses. As a municipal corporation yard, the City qualifies for coverage under SIC code 4111 (Transportation) related to bus servicing and as a Hazardous Waste Treatment, Storage, or Disposal Facility under Subtitle C of the Federal Resource, Conservation and Recovery Act.

It is not the City's intention to be a Hazardous Waste Treatment, Storage, or Disposal Facility but, by definition, the municipal corporation yard qualifies as such because field crews intermittently collect hazardous waste that was improperly disposed of in public streets and creeks and temporarily stores it at the yard until proper, legal disposal is facilitated. It would be appropriate to develop an Industrial SIC designation for Municipal Corporation Yards that correctly reflects this type of activity.

(Fact Sheet, Section B, page 5)

2. The City is concerned with the level of specificity regarding the QISP roles and tasks, without any information being provided regarding the content of the training. The type of activities carried out on industrial sites covered by this Order vary widely and providing a single training that will be useful for all of them will be very difficult. It is understood that the intent is to have qualified people oversee and implement the activities on industrial sites. This would be more appropriately achieved by using the field audits/inspection done by the Regional Boards to identify specific areas of deficiency at particular sites. This would allow limited resources to be focused where they are needed most and remove the potentially costly and time intensive blanket training requirement. Specific training may be required when the need is identified during inspections.

Additionally, the categorical exemption from training for licensed professionals may also be inappropriate as the licensure process does not necessarily equip them to implement measures on a particular industrial site. Most often the person most qualified to implement this Order is the field staff who are most intimately involved with the operations that take place on the site.

*(Order-Section IX, page 23-24)*

3. The Annual Report reporting period is proposed as July 1-June 30. The monitoring period is proposed as January 1 – December 31. The City requests that the monitoring quarters begin at the start of the reporting year (July 1) as opposed to the calendar year as currently written. It will cause confusion if the first quarter of the reporting year refers to the 3<sup>rd</sup> quarter of the sampling and inspection year. The reporting year and the monitoring year should reference the same calendar quarters and start on July 1st.

This comment was included in the City's last comment letter and response given was that the Order was attempting to be consistent with the quarter system in the EPA MSGP. However, the MSGP (Section 6.1.7) states that "Monitoring requirements in this permit begin in the first full quarter following either April 1, 2009 or your date of discharge authorization, whichever date comes later." While a table of quarters is provided, this is provided as a list only and no reference is made to which is the first quarter.

For ease of tracking and reporting it is requested that both the reporting period and the monitoring period run from July 1- June 30.

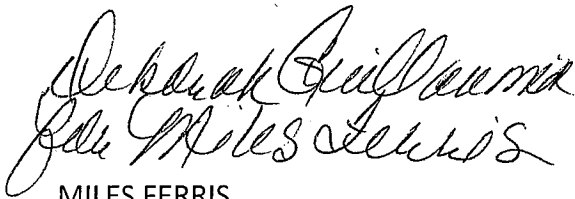
*(Order- Findings, page 11, Section XI, page 36, Section XIV, page 53, and Section XV, page 56)*

4. Depending on the characteristics of the rain event there is a possibility that more than 4 hours will pass after the beginning of discharge before the storm becomes a qualifying storm event. In order to provide for this case, it is requested that B.3.a. be changed to read "Beginning of Qualified Storm Event."  
*(Order- Section XI, page 38)*
  
5. It is requested that the requirement to test Total Suspended Solids (TSS) be replaced with the requirement to test Turbidity. This change would make this order consistent with the Construction General Permit and would allow for the test to be conducted in the field which allows for immediate feedback. Both TSS and Turbidity are indications of the clarity of the storm water on site. Additionally, being able to conduct a field turbidity test, as opposed to sending samples to the lab, would allow facility managers to easily take intermediate readings and adjust practices on the site as needed. *(Order- Section XI.B.5.-6., page 39-40)*

The City remains very interested in preventing/eliminating storm water pollution from its municipal corporation yard and wastewater treatment plant and in maintaining compliance with the Industrial Permit. To support these interests most effectively, the City asks that the Draft Permit be modified with additional clarity and consistency as necessary to address the preceding comments and concerns.

Thank you for the opportunity to comment on this draft Industrial Permit. If you have any questions or concerns that you would like to discuss, please feel free to contact Heaven Moore at (707) 543-4530.

Sincerely,



MILES FERRIS

Director of Utilities