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To: <commentletters@waterboards.ca.gov>
Date: Thu, Jun 29, 2006 5:52 PM
Subject: Storm Water Effluent Limits

I am an independent consultant who assists many industrial facility representatives in California with compliance with storm water and other environmental regulations. I believe that the imposition of numerical effluent limits is impractical, costly, and would result in very little overall benefit to our environment. I'm sure that you are aware of all of the reasons why this is so.



Numeric Effluent Limits
Deadline: July 28, 2006

Because of the current storm water permit requirements, many facilities have put into practice common-sense BMPs that have largely reduced their potential to negatively impact storm water. This includes annual training, which, I believe, has dramatically increased employee awareness of storm water issues so that they modify the way they conduct their daily industrial operations as well as their personal lives. This should be the goal of storm water regulations, as these actions can only lead to cleaner waters in the State.

Therefore, as an alternative to effluent limits, why not require mandatory annual training of all facility representatives who are responsible for implementation of the storm water regulations? This would be similar to many other environmental regulations, i.e. UST; SPCC; and DOT, EPA and DTSC hazardous waste regulations. California would provide the trainer certification requirements in the new permit, and trainers would become certified through state or privately-run programs. Certification updates could be required every 5 years. As a way to enforce this requirement, a training certificate, signed by a certified trainer and the trainee, would be submitted with each annual report.

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