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Posted To: Industrial Stormwater Comments
Conversation: Some comments regarding pH concerns
Subject: Some comments regarding pH concerns

To Jim LaSpina,

Table 6 inappropriately tightens benchmarks and action levels for both the low end and the high end for pH values when discharges are to waters that have been 303(d) listed for pH.

The problem with this approach is that 303(d) listed waters for pH often are listed for violations just at one end of the pH range that is the water quality standards, and often that is the high end because photosynthetic activity can result in elevated pH values. Where waters are listed for pH exceedances, and it is only for exceedances at one or the other end of the standard range, then the benchmarks and action levels need to only be tightened at the end of the range where the exceedances occurred. For reasons described below, even if a water is listed for pH excursions at the low end, the low end pH benchmarks and action levels should not be changed from those in Table 2.

For example, if a freshwater body was listed for pH on the 303(d) list, and the excursions were because of high pH values, then the benchmark values should be <6.0 and >8.5 (instead of <6.5 and >8.5), and the action levels should be <5 and >9 (instead of <6 and >9).

This is a very important distinction.

It is also significant to note that pH in rainfall in Washington is typically in the range of 4.8 to 5.3 (see pH data from the National Atmospheric Deposition Program at <http://nadp.sws.uiuc.edu/>), so compliance with a benchmark of <6.5 and an action level of <6.0 could be difficult to meet entirely due to natural causes. For that reason, I would urge that even if a water was 303(d) listed for low pH, that the low benchmark and action level not be changed from the <6 and <5 values in Table 2. It should not be the intent of this general permit to treat indigenous acidic rainfall that is common throughout the state. Leave it to a TMDL to figure out if stormwater dischargers need more restrictions at the low end of the pH scale.

Table 6 should be changed so that it describes the benchmarks and action levels specific to waters that are listed for high pH only. The pH benchmarks and action levels for the low pH in Table 6 should be <6 and <5, just as in Table 2.

Stormwater permittees should not be required to neutralize natural rainwater. Coordinate with the 303(d) people on this. Appendix 3 then should be adjusted for all the parties who are identified as discharging to waters that are 303(d) listed for pH.

Please feel free to call me if you have any questions about these recommendations.

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