From: A West
Date: Monday, July 06, 2009 2:41:12 PM
Posted At: Industrial Stormwater Comments
Conversation: COMMENT ON PROPOSED ISWGP
Subject: COMMENT ON PROPOSED ISWGP

July 6, 2009

Please consider this a comment on the proposed Statewide Industrial Storm Water General (Discharge) Permit.

The general permit process and procedure as described adequately protects the waters of this State and that it will result in inadequate and substandard monitoring and a lack of effective enforcement and a resulting degredation of water quality and impacts to protected species. The general permit is in violation of ther certification by the State and MOU between the State to the Federal Govrnment regarding NPDES permit administration.

The general permit lacks any provision for currently available off-the-shelf inline effluent monitoring technology that could continuously monitor such parameters as PH, Dissolved oxygen, turbidity and conductivity without unduly burdening business by requiring outdated physical sampling and analysis.

Rather than monitoring one outfall once a year, a permitting system incorporating multiple parameter inline monitoring would provide a daily and accurate reporting of parameters at a cost to permittees and the state comparative to the current and outdated sampling system, which also requirs a considerable time lag between a sample and its analysis.

The General permit scheme should be abandoned and a specific permit required for each discharger, as was the manifest intent of the Legislature in adopting the Clean Water Act. At the very least, industrial dischargers should be classified in groups based upon a reasonable risk assessment, and parameters established by industrial class.

The history of violations and enforcement of the previous permit demonstrates that the general permit scheme, as designed, is completely unworkable, and major revisions are necessary in testing methodology and frequency, enforcement, and of the pollutants and areas covered by the permit.

In particular the requirements for discharge and/or testing of toxic materials, including dioxin and PAH contaminated discharges are not rigorous enough to prevent degredation of water quality, severe contamination and danger to human health.

The requirements for discharge into section 303(d) listed and other areas are also inadequate.

This comment incorporates all of the comment in PCHB 08-113, incorporated herein by reference.

If there is another site for official comments to be addressed to, please notify me of this site, and forward this and the previous comment to it.

Arthur West

On Fri, May 23, 2008 at 10:46 PM, A West <awestaa@gmail.com> wrote:
Please inform me as to the status of the general industrial stormwater permit.

All of the information on the site involves a draft permit. Is there a final version published yet?

For the record, I do not believe the conditions imposed by this permit follow the intent of the CWA, the requirements for testing for toxic waste are inadequate, and the conditions for discharge into section 303(d) listed waters are not sufficient to prevent degredation of ESA protected species habitat.