

SUGGESTED KEY POINTS TO MAKE
ON THE
“INDUSTRIAL ACTIVITIES SECTION OF
THE PANEL OF EXPERTS REPORT”

My name is _____, and I am here on behalf/representing _____. We appreciate this opportunity to provide comments on the Panel of Experts Report on Numeric Limits for storm water discharges.

My comments today will focus on the Industrial section of the Report.

- **CURRENT DATABASE INADEQUATE TO ESTABLISH NUMERIC LIMITS**

We agree with the Report’s finding that the current Water Board Storm Water Database cannot be used to develop numeric effluent limits.

- **NEED FOR NEW MONITORING AND DATA BEFORE ESTABLISHING NUMERIC LIMITS:**

We also agree with the Report’s finding that the Board needs to collect new monitoring data **BEFORE** it can develop numeric effluent limits that are practical and achievable.

- **COST OF MONITORING – COST EFFECTIVE WAY TO MONITOR**

We strongly agree with the Report’s finding that the SWRCB consider the total economic impact additional monitoring and data collection will have on industries in California. Therefore, it is important that monitoring and data collection must be done in a cost effective manner.

One possible monitoring program would include monitoring a specific site that is representative of industry class types. That way, not every discharger will have to conduct individual monitoring and data collection.

- **IF ADEQUATE DATA IS AVAILABLE, SWRCB ESTABLISH ACTION LEVELS**

We agree with the Report, where there is adequate information and data, the SWRCB establish Action Levels or Benchmarks that are not numeric limits but are to be used as a way to measure BMP effectiveness. We do recommend that the SWRCB establish a technical and scientifically based process to ensure credible Action Levels that are practical and achievable are developed.

- **SWRCB NEEDS TO DEVELOP A DESIGN STORM CRITERIA FOR PERMITS/POLICIES**

Finally, there must be some consideration made in regards to what do we do when we cannot stop the rain from coming down. Despite the assertion in the Report that industrial operators have control over their facilities, what happens when an operator can no longer contain, treat or handle excessive storm water? We strongly recommend the State Board should develop a design Storm Criteria in future permits, policies and requirements.

Thank you for the opportunity to provide these comments.