



STORM WATER RUN-ON

AUGUST 2013



NEWSLETTER

On August 21, 2013, The State Water Board conducted a hearing on the latest draft of the Industrial General Permit (IGP).

This document does not explain the requirements of the latest draft, just what transpired at the two hour meeting.

CASQA - California Storm Water Association and the Non-Governmental Organizations (NGOs) Waterkeepers spoke for 20 minutes. Other speakers were granted 3 minutes. There were an additional eleven (11) single speakers. The hearing was not as heavily attended as previous IGP draft hearings, 70% of the seats were occupied. Auto recyclers were the largest group represented. The following represents a brief synopsis of the comments. Final comments are to be received before noon on September 6, 2013.

Most speakers considered the new Draft Permit to be a significant improvement over the previous draft. Time was devoted to clarification of Permit terms, the amount of sampling, and the application of 'green' concepts like Low Impact Development (LID).

Sampling and compliance standards were discussed as to which limits should apply and whether it should be at the property discharge point or where the discharge water contacts the receiving water (ocean, stream, lake, or river).

The Permit is scheduled to be implemented January 1, 2015. The wet season end, July 15, 2015, was preferred.

Concern was expressed that if Advanced BMPs (treatment) was required, the Regional Water Boards should indicate acceptability of the Advanced BMP prior to installation.

Industry presentations were from mining, food processing, scrap metals, construction, and auto recycling industry. The auto recycling industry had presentations from (in order of appearance):

Auto Recycler Presentations

1. **Ecology**
Concerned about stored storm water releases, use of a pH meter over litmus paper, definition of storm water.
2. **SCADA**
Dawn Koepke explained the Partners Program, discussed the complexity and liability of the Permit and explained the possibility of businesses going underground if compliance is too difficult or expensive.
3. **Brash Industries/CADRA**
Marvin H. Sachse pointed out that 10% of the permittees were auto recyclers, 1,000 recyclers out of 10,000 permits. The \$1,300 annual fee was too expensive for most small businesses stating that the fee should be based on a sliding scale, smaller facilities paying less money. He proposed the Compliance Group Leaders should have more training than a site operator. He also pointed out the importance of background levels of contamination being exempted from the sampling analysis.
4. **IADA/CADRA**
Martin Bright spoke about the 'rogue' operators in the industry. He spoke passionately about the real world economic circumstances of the auto recycling industry, and that citizen suit litigation was extremely burdensome for the industry serving more to enrich environmental attorneys than to improve site compliance. Mr. Bright's emotional comments did stimulate a response from both the Board and the NGOs.

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