

STATE OF COLORADO

John W. Hickenlooper, Governor
 Christopher E. Urbina, MD, MPH
 Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
 of Public Health
 and Environment

July 9, 2012

Mr. Pete Jacobson, Managing Director
 Colorado Stone Sand and Gravel Association
 1799 Pennsylvania St., Suite 240
 Denver, CO 80113

Dear Pete,

Dr. Urbina requested that I respond on his behalf to provide you information on the progress the Division has made in responding to the list of questions you submitted during a meeting held on May 8, 2012 with Dr. Urbina, Martha Rudolph, and Doug Young. We appreciate your continued efforts in helping your members fully understand and comply with the requirements of renewal permit COR900000.

Since the issuance of the Master General Permit on March 7, 2012, the Division has been actively working on issuing permit certifications to individual entities covered under this renewal permit. Issuance of permit certifications was completed on June 29, 2012 and your members should by now have copies of their certifications authorizing them to discharge in accordance with the permit.

The Division has also been developing presentation materials for training sessions scheduled for CSSGA members and other entities operating in accordance with this permit, the first of which is scheduled for July 17, 2012 and will be led by Maura McGovern of the Division. We have incorporated nearly all of the questions you submitted on May 8, 2012 into the presentation materials and/or question/answer time allocated for the first session. We believe that this open forum will be the most productive time to address questions of the nature you submitted on May 8, 2012, as it allows for back and forth dialogue and sharing of specific examples/situations that permittees face. We appreciate the list you provided as they are detailed questions related to specific "real world what if" scenarios that permittees encounter, and it has been helpful for us to be sure to include information in the training materials most important to the audience that will be addressed. I do want to take the opportunity to address one question which is related to the basis for the general permit terms and conditions, as follows below:

- Why the increase to five types of monitoring from one type of monitoring compared to old permit which was based on Effluent Limitations Guidelines Monitoring?

The Division addressed a number of comments received regarding monitoring requirements in this renewal permit and the response to comment document posted on www.coloradowaterpermits.com has

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a tremendous amount of information regarding the basis of the permit monitoring requirements. In summary, the Division determined that the increased monitoring requirements included in this permit are necessary and appropriate to characterize and address the pollutant potential of industrial stormwater discharges to state waters. As further described in the response to comments document, the limited data that has been collected and submitted in Colorado for sites covered under this permit, together with information available from other states and nationally published scientific studies, indicates that industrial facilities continue to discharge pollutants in stormwater from their facilities at levels that have the potential to cause or contribute to an exceedance of water quality standards. This substantiates the Division's determination that the time was appropriate to increase monitoring requirements, and include corrective action requirements which allow an opportunity for facilities to review and evaluate the effectiveness of the control measures in place at each site.

If you or one of your members would like to have a specific question regarding their situation answered in advance of the training session please contact a member of our staff by phone, so that the staff person can be sure to understand their particular situation. A good contact is Maura McGovern, since she will also be conducting your training sessions and Maura can be reached at 303-692-3392. If Maura is unavailable please call 303-692-3512 and you can be directed to another staff person. Also feel free to contact me at 303-692-3599.

Sincerely,



Janet S. Kieler
Permits Section Manager
Water Quality Control Division