

Mr. Rich Gannon
Division of Water Quality
Planning Section
1617 Mail Service Center
Raleigh, NC 27699-1617

Reference: Comments on the Proposed Jordan Reservoir Nutrient Strategy
The University of North Carolina at Chapel Hill

Dear Mr. Gannon:

Enclosed please find The University of North Carolina at Chapel Hill's (UNC's) comments on the Proposed Jordan Reservoir Nutrient Strategy. UNC is located within the Upper New Hope Creek Arm of the reservoir and operates a municipal separate storm sewer system under NPDES Permit Number NCS000441.

Comments

Rule: 15A NCAC 02B .0271 (4) (a) and (b)

The NCDOT shall develop a single Stormwater Management Program that will be applicable to the entire Jordan Lake watershed and submit this program for approval by the Division. The program shall include the following elements and meet the associated criteria:

- (a) Identify NCDOT stormwater outfalls from Interstate, US and NC primary routes;
- (b) Identify and eliminate illegal discharges into the NCDOT's stormwater conveyance system;

Comment:

UNC respectfully requests that all state and federal regulated entities be permitted to use illegal discharge detection and elimination to help satisfy the nutrient reduction requirements rather than limiting this option exclusively to NCDOT. In addition to NCDOT, other entities, including UNC, will be identifying their stormwater outfalls and mapping stormwater infrastructure in order to identify and eliminate illegal discharges as required by NPDES permit requirements. UNC intends to quantify any nutrient reductions that result from the detection and elimination of illegal discharges to its

stormwater conveyance system and apply these reductions to the overall goal of reducing nitrogen and phosphorus loading to the Jordan Reservoir. Illegal discharge detection and elimination is mentioned with regard to NCDOT as a way to help meet the nutrient reduction requirements but is not addressed in the proposed Rule with regard to non-NCDOT state and federal regulated entities.

Rule: 15A NCAC 02B .0271 (7)

The NCDOT may in its program submittal under Sub-Item (6)(b) of this Rule request that the Division accept the NCDOT's implementation of another stormwater program or programs, such as NPDES stormwater requirements, as satisfying one or more of the requirements set forth in Item (4) of this Rule. The Division shall provide determination on acceptability of any such alternatives prior to requesting Commission approval of NCDOT programs as required in Sub-Item (6)(b) of this rule. The NCDOT shall include its program submittal technical information demonstrating the adequacy of the alternative requirements.

Comment:

UNC respectfully requests that implementation of NPDES stormwater permits be allowed to satisfy one of more of the requirements set forth in Item (3) of this Rule for all permitted entities. UNC has an NPDES stormwater permit, and it is possible that other state and federal entities in the Jordan Reservoir watershed may now or at some future time also operate under NPDES permits. UNC respectfully requests that all permitted entities be allowed to use NPDES stormwater requirements to help meet the mandates of this Rule.

UNC appreciates the opportunity to comment on the Proposed Jordan Reservoir Nutrient Strategy. If you have any questions about these comments, please contact me at (919) 962-9752 or at samyers@ehs.unc.edu.

Sincerely,

Sharon A Myers, L.G.
Environmental Specialist/Geologist

cc: Meg Holton
Carolyn Elfland