



SPECIAL HEARING
2/3/05
cc: BD, DI, DWQ
E-Cys: BD, CC, HMS, TH, CMW

1-28-05

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control board
1001 I Street, 24th Floor (95814)
P.O. Box 100
Sacramento, CA. 95812-0100

Dear Ms. Irvin,

I recently attended the Manufactures Council of the Central Valley meeting and learned of the new proposed regulations regarding the permit for Storm Water Discharges. We are a small company and based on my review of the proposal, we would be adversely effected by the policy if we were to implement it. My hope is that we will qualify for the Exclusion from Coverage by receiving a No Exposure Certificate.

We understand the need for Industry to be good stewards with their practices and their potential impact to the environment. However, the level of requirements and documentation seems excessive. This proposal asks for weekly, monthly, quarterly and pre rain event inspections. To document this in our opinion goes further than necessary and would be an added cost to our company that further degrades our ability to make a profit. I would hope that most companies inspect regularly if for no other reason than to create a safe and healthy environment for their employees. To propose this level of documentation seems to be a misuse of time and monies for both companies and the State. We see companies in California struggling to be competitive in a global market and with the States growing deficit make this appear to be counter productive to both parties. These continued cost increases add to the reason why business continues to leave California.

I appreciate the opportunity to express our concerns regarding this proposal.

Sincerely,

Brian Indelicato
Director of Quality Assurance