



SPECIAL HEARING

2/3/05

cc: BD, DI, DWQ

e-cys: BD, CC, HMS, TH, CMW

January 27, 2005

73. Strategic Materials Corp.

State Water Resources Control Board

To Whom It May Concern:

In reviewing your proposed 2004 draft permit for the industrial general permit, a number of issues come to mind. If the goal of the new permit is to further clean up the environment, the point of the original legislation, it might be more expeditious to enforce the current permit and get the other 90% of the stationary sources (industrial) to comply.

Please look at how many companies have voluntarily complied versus those that have not. Those companies who currently have storm water runoff programs are working hard to stay in compliance at significant cost while probably the majority of companies have not only not complied, may not know about the regulation or don't care. It will be much more even handed if the State Regional Water Board go after the non-participants than to punish, with exorbitant costs and regulation, those who are trying to help and comply.

Your current permit covers the intent of the legislation, the proposed revision does not. It simply adds costs, paperwork and bureaucracy to those that agree that it is everyone's responsibility.

Please consider that the most good can be accomplished through enforcement, not further redundant regulation. From an economic point of view, as enforcement is stepped up fines and permits will significantly increase the revenues to the Regional Water Board thus paying for more enforcement.

If after getting a 90% compliance rate with the current revision, the results from run off don't improve the quality of our lakes, rivers, aquifers and coastlines, then consider more regulation, not now. It is estimated that the proposed revision will cost this company an additional \$7,000.00 to \$9,000.00 a year and typically will not change our runoff significantly, just cause us again to consider moving out of California.

Thank you for your consideration.

Yours truly,

B. Deeble

Strategic Materials Corporation

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