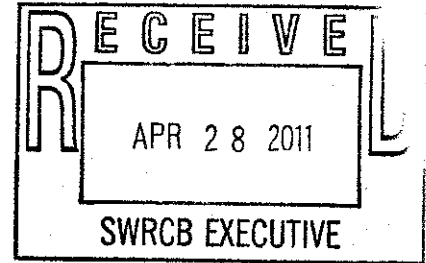


From: Mark Johnson <Mark.Johnson@SSAMarine.com>
To: "commentletters@waterboards.ca.gov" <commentletters@waterboards.ca.gov>
CC: Ed DeNike <Ed.DeNike@SSAMarine.com>
Date: 4/28/2011 12:49 PM
Subject: Draft Industrial Storm Water Permit Regulations



Dear Sir:

We appreciate this opportunity to submit these brief comments.

SSA Marine operates marine terminals within California ports. We are a leader in our industry when it comes to harnessing efforts to use the latest technology, practices, and procedures to protect the marine environment. We regret that we must unfortunately express our serious concerns over the General Industrial Storm Water Permits proposed by the Board.

We and many others in the goods movement industry support sensible steps to improve water quality in California. Having said that, we also believe that before making changes to the permitting standards the Board has a responsibility to take into account measureable environmental benefits as well as a thorough cost analysis, not to mention determining whether compliance is feasible. We are not convinced the Board's draft meets any of this criteria. The preliminary cost associated with terminal compliance is grossly exorbitant and state of the art treatment systems are almost guaranteed to not meet the EPA benchmarks within a Port, bringing into question whether compliance is even feasible. Eliminating group management plans also causes us considerable concern.

No doubt you will receive comments from many others expressing opposition to what has been proposed. We urge the State Water Resources Control Board to work with all interests to put in the due diligence and analysis of benefits, costs and alternatives before proceeding any further with the proposed permit.

Mark Johnson
SSA Marine
700 Pier A Plaza
Long Beach, California 90813