

From: "Ricci, Rob - CalRedCo" <RRicci@calredco.com>
To: <commentletters@waterboards.ca.gov>
Date: Wednesday, February 16, 2011 2:22 PM
Subject: Comments to Changes in the Industrial Permit

Pre-Storm Inspection- Here on the north coast we would be inspecting almost each day during the winter. This change is not feasible or practical for areas with frequent storm events.

Sample frequency- I have been sampling storm water at our facilities now for almost twenty years. The samples are almost the same today at the facilities as they were twenty years ago. Sampling more often is a waste of money for businesses and just places more paper work in the public files. Why don't you make a real positive change and require no or less sampling for those facilities which meet the NAL and maintain their BMP. Don't penalize the folks that are doing a good job of storm water management by adding more operating expense.

Field Measurements: Many small businesses do not have the equipment or personnel to obtain field measurements. I believe you will get data that is not accurate. You are going to get more accurate test data by requiring sample preservation procedures and same day lab delivery.

Conditional Exclusion: I don't know of any exclusions in our area or for that matter most areas.

