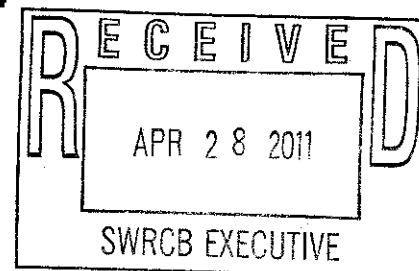


Reliable TAPE PRODUCTS

3300 E. 50TH Street, Vernon, Ca 90058 (323)588-8044

California State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Attention: Jeanine Townsend, Clerk to the Board



Subject: Comment Letter – Draft General Industrial Activity Stormwater Permit

Dear Ms. Townsend and Members of the Board:

On behalf of Reliable Tape Products, we are providing comments relative to the Draft General Industrial Activity General Permit (GIASP). Our business has a facility located at 3300 E. 50th St, Vernon, California, 90058. Our business appreciates the State Water Board's efforts in proceeding to revise and reissue the GIASP. As residents of California, we understand the importance of water quality and the role of the FIASP. However, based on our review, we clearly foresee that this permit will have detrimental effects on the business community statewide. As you may already know, operating a business in California is a delicate regulatory balancing act which is why we find it critical for our company to provide comments for the draft GIASP. As the draft permit is written, conducting business in California may no longer be feasible for our company. We have several concerns that we request the State Water Resources Control Board to reconsider:

1. This permit incorporates US EPA Benchmark Values as Numeric Action Limits (NAL) and Numeric Effluent Limits (NEL). Given the inconclusive findings of the Blue Ribbon Panel that was convened by the State Water Board in addition to the Best Available Technology, "defaulting" to the US EPA Benchmark Values as NALs and NELs is unduly onerous, without justification, and inappropriate at this time. The US EPA Benchmark Values were never intended to be used as a compliance standard. We anticipate that this particular proposed permit action will not only require significant financial resources from our businesses in an already stressed economy but also make permit compliance marginally achievable. In addition, implementing the US EPA Benchmark Values as NELs will be potentially destructive to a company with no identified relief in sight. As it is written in the draft GIASP, triggering an NEL could potentially cause a business to be subject to fines of \$37,500 per calendar day with no ceiling. We suggest the State Water Board remove the US EOA Benchmark Values as NALs/NELs and to consider a more progressive and feasible approach.

Bottomline, small business like ours can not afford more regulations that restrictive.

Thank you for your time.

Shirley Chua