

*Allied Waste Industries, Inc.
California Waste Association
California Refuse Removal Council
County of Orange Integrated Waste Management Department
Inland Empire Disposal Association
Los Angeles County Sanitation Districts
Los Angeles County Waste Management Association
Monterey Regional Waste Management District
Norcal Waste Systems, Inc.
Onyx Environmental Services
Republic Waste Services
Solid Waste Association of North America, California Chapters
Solid Waste Association of Orange County
Waste Management*

February 3, 2005

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

Subject: California Waste Industry Coalition Comments on the Reissuance of the National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated with Industrial Activities Draft dated December 15, 2004 (Draft Permit)

Dear Ms. Irvin:

The undersigned representatives of the letterhead organizations are part of a broad coalition of California waste industry interests that are very concerned about certain provisions of the NPDES general permit for discharges of storm waster associated with industrial activities (dated December 15, 2004).

Our coalition would like to thank the State Board for the tremendous effort its Staff put forth in creating the Draft Permit and providing the opportunity to comment on the Draft Permit. However, the purpose of this letter is to provide the State Water Resources Control Board ("State Board") with our coalition's concerns regarding this Draft Permit. In addition to this letter, we have attached a tabular summary of principle concerns. While we can support many provisions of the Draft Permit, such as clarification and enhancement of SWPPP requirements and certain monitoring provisions, our industry has significant concerns in a number of areas which we