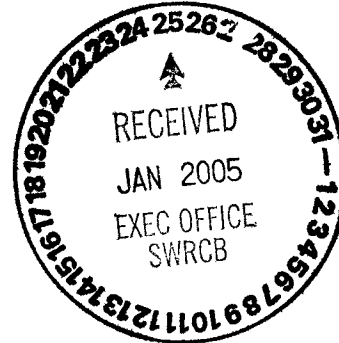




January 21, 2005

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, California 95812-0100



RE: Comments on Draft Industrial General Permit

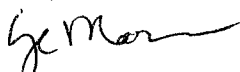
Our companies have six sites that are registered under the general industrial storm water permit. We have made a sincere effort to ensure our compliance with the current storm water permit and to minimize our impact on storm water runoff at our sites. In light of this, it is very frustrating to read the proposed revision to the permit which seems to further penalize those industry representatives that are actively trying to comply. I have no doubt that there are many businesses that are currently required to register under the general permit and have failed to do so. Prior to making the permit more restrictive, why not focus on enforcement and increasing the number of registrants? Furthermore, there are a variety of standard industry codes that are not currently listed under the general permit that have an impact on water quality.

I would like to provide you with two concrete examples of how the proposed revisions would impact our company. (1) We have a small quarry where no rock has been extracted since September 2002. The most recent storm water sample was collected there on 2/16/04. The total suspended solids result was 160 mg/L which exceeds the US EPA benchmark value of 100 mg/L. This site had been inactive for 18 months and would not meet the proposed limitation for TSS. (2) We are required to collect upstream samples at another site and the most recent sample was collected on 4/19/04. The pH at this background location was 4.4 which is below the lower threshold proposed for pH in the draft permit. The storm water runoff for our site should not be expected to show an improvement over the background results.

Requiring that the first two qualifying storm events be sampled removes the reasonable flexibility that the current program offers. Any storm meeting the criteria of three dry days prior should be representative of water quality. There is no value in requiring that non-discharging storms be recorded. Persons responsible for implementing these plans monitor storm activity out of necessity. Formally recording these observations is not necessary. The new permit would require up to two monthly observations prior to storm events. This is overly burdensome since monthly checks are already done within the first hour of discharge and quarterly dry weather checks are completed.

Please reconsider the impact that these changes would have and their real value.

Thank you,


Cheryl Moore