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September 19, 2013

VIA EMAIL

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov



Re: Comment Letter- Industrial General Permit

Dear Ms. Townsend:

On behalf of the California Manufacturers & Technology Association (CMTA), I want to thank you for the opportunity to comment on the proposed General Industrial Stormwater Permit. We definitely appreciate the extension of the comment period to digest the costs recently released. Our comments are relatively brief.

1 CMTA appreciates that the effective date has been extended one year to January 1, 2015, but we believe that a mid-rainy season effective date will be problematic for reporting and for analysis to determine compliance. We would definitely prefer to see a July 1, 2015 implementation date adopted.

2 We believe that permittees with known exceedances due to naturally occurring levels should qualify for a Natural Pollutant Source Demonstration initially upon the effective date without having to reach a Level 2 Exceedance Response Action Level. Because the purpose of the report is to demonstrate that other sources are the cause of the NAL exceedances, the General Permit should not place limits on when those demonstrations can be submitted.

3 While the majority of our facilities have pH meters and trained personnel to handle them, that is definitely not the situation with a significant number of small manufacturers producing non-technical products. We believe that pH paper should suffice to determine if the facility stormwater discharges or acidic or basic and pH meters should be mandated where a problem has been demonstrated to exist. Employees handling such equipment must be technically savvy.

4 Per the draft permit, annual reports are due July 15th. CMTA recommends 30 days from the end of the reporting year... 15 days is simply not enough time. An extra 15 days during a non-rainy season period should not negatively impact the effectiveness of the program.

CMTA appreciates the hard work and openness of your staff and believes that this draft, will achieve the desired results and, at the same time, keep the cost on manufacturers at least within reason.

Sincerely,

Michael J. Rogge
Policy Director, Environmental Quality