



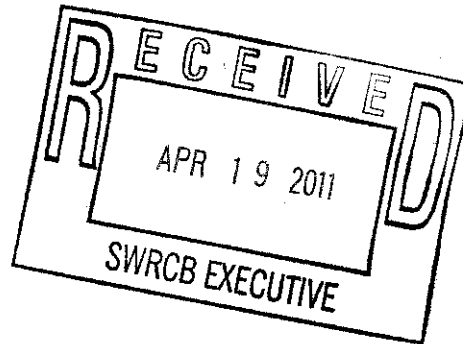
Public Comment
Draft IGP
Deadline: 4/29/11 by 12 noon

► Mendocino Forest Products Co., LLC

CALPELLA DISTRIBUTION CENTER
P.O. Box 336
6375 N. State Street
Calpella, CA 95418
(707) 485-6800
FAX (707) 485-6821

UKIAH SAWMILL
P.O. Box 120
850 Kunzler Ranch Rd.
Ukiah, CA 95482
(707) 468-1431
FAX (707) 468-5745

www.mfp.com



April 13, 2011

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

RE: Comments on Draft Industrial General Stormwater Permit

The following comments are in response to the draft statewide general NPDES permit for the discharge of stormwater associated with industrial activities issued for public comment (as extended) through noon on April 29, 2011.

Although I have a number of concerns as it pertains to the draft permit and feasibility of implementation at our eight sites that are currently covered under Water Quality Order 97-03-DWQ, I will limit my comments to those items that I feel present the most significant difficulty in terms of implementing and that have little benefit to the effectiveness of the program.

First and foremost, although I do firmly support formalized training and certification for those people that will have lead responsibility for ensuring permit compliance, I do not feel that all persons involved with routine tasks should be subject to a certification training or exam. As a prime example of the difficulty this presents, we have a very remote unmanned site that takes two hours to access from any of our offices. When personnel are working in this area in the winter they keep sample bottles with them in the event that discharge may be occurring that could be sampled. If a certified person has to collect these samples and do these inspections, up to six people would need to be trained. It makes a great deal more sense and is much more realistic to have one or more persons certified that will then do in-house training to allow a variety of personnel to efficiently collect samples and do routine inspections.

Comments on Draft
Industrial General Stormwater Permit
Page 2 of 2
April 13, 2011
Cheryl Meyers

Secondly, the need for online training is of special importance to us since our sites are in remote locations that often necessitate driving in excess of six hours roundtrip to attend the classes that are most frequently offered in metropolitan areas. If online training was available we could actually train more of our personnel as the time and dollar expenses would be within reason without the travel and lodging expense.

Although it appeared from the comments at the public meeting held in March that the Board did not intend to dramatically increase the number of inspections required with the new permit, the draft permit reads to me that inspections may actually be required prior to and during every rain event. That is truly excessive and will not provide any valuable information for established, unchanging sites that are most frequently represented by industry covered by this permit. I ask you to reconsider the language and ensure that it cannot be interpreted to require this excessive level of inspection.

Lastly I will close by asking that the Board make a concerted effort to bring all industry requiring coverage under this permit. Representing a business that tries diligently to be in compliance, it is very frustrating to see our competitors operating without permit coverage. This should really be a primary focus of the Board, and one that should outweigh the desire to make the permit for those already attempting to comply even more stringent.

Thank you for your consideration of these comments in finalizing a new permit that will be protective of water quality but also supportive of industry in our state.

Sincerely,



Cheryl Meyers
Environmental Manager