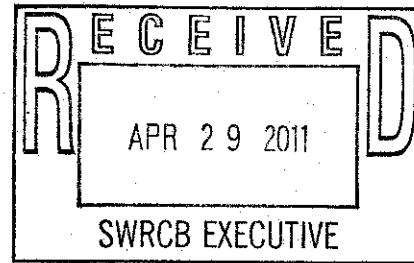




April 29, 2011

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



Comment Letter – Draft Industrial General Permit

This is to express the concerns of the Metal Finishing Association of Southern California [MFASC], Metal Finishing Association of San Diego [MFASD], and Metal Finishing Association of Northern California [MFANC] with the proposed Industrial General Permit [IGP] that the State Water Resources Control released on January 28. We request that the Board suspend the proceeding and conduct individual workshops.

MFASC, MFASD and MFANC are nonprofit trade associations of management executives in the fields of metal finishing, electroplating, powder coatings, enameling, galvanizing, anodizing, buffing, polishing, plating on plastics, bumper recycling, electroforming and related processes. They are an essential component of California's high-tech industries, supplying surface treatments for electronics, aerospace and consumer goods manufacturers.

The draft IGP is a significant revision to the current permit that requires facilities to manage storm water discharges through the implementation of best management practices. Prior to the release of the new draft earlier this year, it had been several years since the Water Board had engaged with stakeholders. We were unaware of the decision to proceed with a new draft, and we were not involved in its development.

Our associations are quite concerned that the draft IGP would eliminate group monitoring programs that have been used effectively by our member facilities throughout the state. The metal finishers' group monitoring program has existed for the past sixteen years. One hundred job shop plating facilities participate, with an annual fee of \$500 per facility. This has enabled small manufacturing businesses to perform monitoring, inspections, analyses, and reports that enable the IGP objectives to be met and for the costs to be more affordable.

Preliminary estimates are that eliminating the program would increase the costs per facility at least 600%. However, the Board has stated in the recent public workshops that it will not conduct an economic analysis of the impacts of the draft IGP. This is quite troubling. We urge the Board to request that staff conduct a thorough cost analysis.

There are other serious issues with the proposed requirements, which go far beyond the requirements imposed by the United States Environmental Protection Agency. The program would move from "benchmarks" to "numerical limits" and would escalate the mandated requirements based on sampling results. These actions are being taken even though the Board has not yet acted upon recommendations of the panel of experts that it convened. That panel noted the need to re-examine existing data sources and to collect new data prior to considering the establishment of numeric limits.

We urge the Board to consider these issues, and to take the appropriate action to protect the environment while providing effective compliance mechanisms, providing an opportunity for meaningful engagement of its stakeholders, and considering and acting upon the recommendations of the panel of experts.

Sincerely,

Dan Cunningham

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