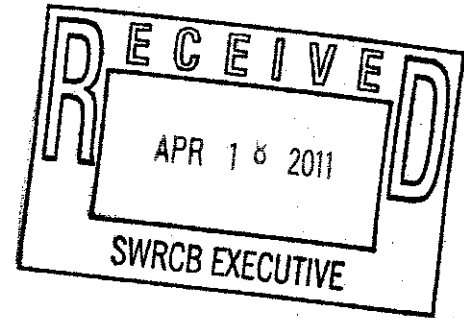




P.O. BOX 1026 • HUNTINGTON BEACH, CA 92647-1026 • (714) 847-3581 FAX: (714) 841-4660

April 12, 2011

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



Re: Comment Letter – Draft Industrial General Permit

To Whom It May Concern:

These comments have been written on behalf of Rainbow Disposal in Huntington Beach, CA in regards to the State Water Resource Control Board's (SWRCB) proposed 2011 Draft Industrial General Permit for storm water discharges. We have several concerns with the new proposal and hope that the SWRCB will take our comments into consideration as they move forward with any revisions prior to adoption.

• **Increased Costs:** the new permit will dramatically increase the annual costs associated with compliance. The SWRCB did not conduct a cost analysis or an Economic Impact Analysis prior to the release of the proposed new permit and CTA, in addition to several other impacted industries, are concerned that the anticipated spikes in annual costs will drive business out of California and/or force businesses to close their doors permanently. CTA is anticipating, at the very least, a 1000% cost increase for businesses within the trucking industry.

• **Unqualified Regulatory Burden:** prior to the release of the proposed permit, the SWRCB did not draw any scientifically based conclusions that would justify the necessity of implementing a new permit that will impose a significant regulatory burden upon businesses in California. There is no existing evidence that shows that while the SWRCB employed a "Blue Ribbon" panel of academics, the panel acknowledged that they did not conduct any scientific research to support their claims that a new, more stringent permit is necessary.

• **Violates Administrative Law:** The State Water Board has scheduled a hearing on the Industrial General Storm Water Permit and set a final comment deadline even though the very notice for this rule states that it is "currently not in its complete form." This is a violation of California and federal law.

Thank you for the opportunity to comment and for considering these views as you develop the final draft of the 2011 Industrial General Permit.

Sincerely,

Jerry Moffatt
President/COO
Rainbow Disposal Co., Inc.