



April 26, 2011

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

Re: Comment Letter – Draft Industrial General Permit

Dear Board Members:

We have several concerns about the Draft Industrial General Permit.

We are a small recycling center in Southern California with 5-6 employees. We accept **beverage containers** and **non-ferrous metals** from the public. (Our operations are 99% indoors) Minimal outdoor operations, limited to parking and minimal loading mostly from residential customers.

Some of the new requirements will be even more costly and create more red tape than current regulations, which are already creating a hardship, without much additional benefit to the environment.

We have a Conditional Use Permit from the City which includes all the SWPPP BMP requirements. The State Industrial General Permit is duplicating the City's efforts, while costing our business unnecessary costs, paperwork and lower productivity. In addition, the property we lease has other tenants, so the water is commingled. Why do we even need a permit?

The requirement to have a **specialty licensed consultant** would be costly for a small business. Currently, we do use a consultant to ensure we comply with all the requirements, but they are not cheap and they will raise their fees if their own costs go up.

The requirement to file electronically may be difficult for some small businesses.

Performing official weekly inspections would be burdensome. Businesses are probably ensuring outside cleanliness, and it doesn't rain that often in Southern California. So weekly formal inspections are over the top.

Along with all the other State regulations, additional SWPPP requirements would be onerous with minimal additional benefit to the water streams.

Respectfully,

Oren Zarin
Manager