

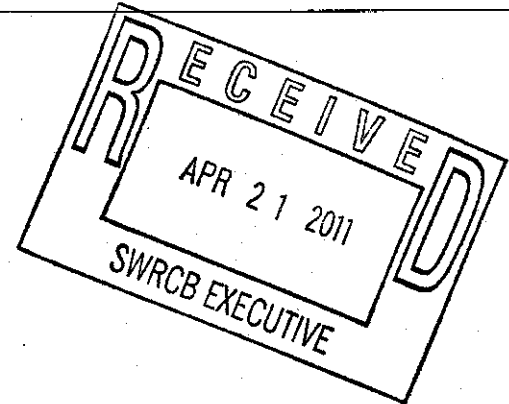
Heitz

TRUCKING, INC.

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

HTI LOGISTICS LLC

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I St. 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 Heitz Trucking in Oakland, Ca, in regards to the State Water Resource Control Boards' (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.

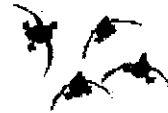
INCREASED COSTS: The SWRCB did not conduct a cost analysis or an Economic Impact & Analysis prior to the release of the proposed new permit. The CTA is anticipating, at the very least a 1000% cost increase for businesses with the trucking industry. We do not want to be driven out of California or forced to close our doors due to the anticipated spikes in annual costs.

UNQUALIFIED REGULATORY BURDEN: Prior to the release of the proposal 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. 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, stronger permit is necessary.

REMOVAL of GROUP MONITORING: The new permit will effectively outlaw group monitoring in the State of California and will require all facilities under the new Industrial General Permit to meet the same requirements on an annual basis. The elimination of

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group monitoring will impact us as a CTA member who currently participate in the CTAMG. We rely on the CTA to be in compliance since 1993 when CTAMG was first established.

VIOLATES ADMINISTRATIVE LAW: The State Water Board has scheduled a hearing on the Industrial General Storm Water Permit to set a final comment deadline eventhough the very notice for this rule states that it is "currently not in complete form". This is a violation of California and federal law.

Heitz Trucking Inc., along with the CTA is urging the SWRCB to conduct an Economic Impact Analysis and a Cost/Benefit study to justify the alleged need to revise the Industrial General Permit so drastically. If such evidence supports the need to make revisions to the existing permit, we are also encouraging the SWRCB to engage industry state holders to create a permit that addresses those short comings for the betterment of the water quality.

Our company takes storm water pollution very seriously and has continuously strived to succeed in complying with all the requirements outlined within the existing permit.

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,

Roger Heitz

Heitz Trucking Inc. President