

BOARD OF DIRECTORS
LEO LASKA
CHAIR
SUE McCLOUD
VICE CHAIR
GARY BALES
DAVID PENDERGRASS
LIBBY DOWNEY
JANE PARKER
IAN OGLESBY
BRUCE DELGADO
DENNIS ALLION



MONTEREY REGIONAL WASTE MANAGEMENT DISTRICT

Home of the Last Chance Mercantile

April 6, 2011

Public Comment
Draft IGP
Deadline: 4/29/11 by 12 noon
DEE
GER/
DISTRICT ENGINEER

RICHARD SHEDDEN, P.E.
SENIOR ENGINEER

RICHARD NORTON
ADMIN. SERVICES MGR.

ROBERT WELLINGTON
COUNSEL

DWQ

RECEIVED

APR 12 2011

DIVISION OF WATER QUALITY

Mr. Charles R. Hoppin, Chair
State Water Resources Control Board
1001 I Street, 22nd Floor
PO Box 100
Sacramento, CA 95812-0100

RE: Proposed General Industrial Permit for Storm Water Discharges; National Pollutant Discharge Elimination System (NPDES)

Dear Mr. Hoppin:

The Monterey Regional Waste Management District (MRWMD), a public entity duly organized pursuant to the provisions of California Health and Safety Code sections 4170 *et seq.*, was established in 1951 for the purpose of acquiring, owning, operating, and maintaining a sanitary landfill site, and all related improvements for use by its member entities. The Monterey Peninsula Landfill (MPL), which is owned and operated by the MRWMD, is a Class III landfill located in unincorporated Monterey County, approximately two miles north of the City of Marina, California. The MPL is currently operating under Waste Discharge Requirements Order No. R3-2006-0017, issued by the California Central Coast Regional Water Quality Control Board (CCRWQCB). The MPL is a state-of-the-art sanitary landfill that is highly protective of surface and groundwater. The MRWMD is currently in compliance with the General Industrial Storm Water Permit and manages storm water runoff through the implementation of best management practices (BMPs).

The MRWMD is very concerned that the State Water Resources Control Board is proceeding with a rule-making on the General Industrial Storm Water Permit that could cost the MRWMD a significant amount of money without first conducting a thorough analysis of its water quality benefits, its total costs, and whether there are less costly alternative strategies that could manage storm water contamination more cost-effectively.

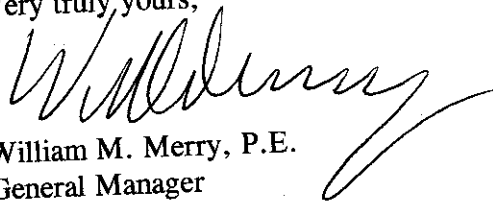
We need to continue improving water quality in California, but we need to proceed intelligently to ensure that regulations provide measurable environmental benefits, and that we clearly understand their costs before approving them. State law requires that a number of factors be analyzed before developing such regulations including measuring its water quality benefits and calculating the cost of compliance. We are concerned that such due diligence has not been undertaken for the General Industrial Storm Water Permit, which will impact not just private companies, but also schools, transit agencies, cities, counties, sanitation agencies and other public agencies, such as the MRWMD. At a time when public agencies already are facing budget challenges, this proposed permit would mean even further cuts to vital services.

Mr. Charles R. Hoppin
April 6, 2011
Page 2

We support a General Industrial Storm Water Permit without arbitrary "Numeric Action Levels" (NALs) and "Numeric Effluent Limits" (NELs)", and one which protects water quality while minimizing cost to the public agencies and private companies that must comply with it. We urge the Board to work with stakeholders to conduct the required analysis of benefits, costs, and alternatives before proceeding any further with this permit.

We appreciate the opportunity to comment on the draft revised Proposed General Industrial Permit for Storm Water Discharges. Please call Assistant General Manager Tim Flanagan or me at (831) 384-5313 if you have any questions regarding the above comments.

Very truly yours,



William M. Merry, P.E.
General Manager

cc: Mr. Roger Briggs, Executive Officer, CCRWQCB
MRWMD Board of Directors