



California Timberlands Division

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Public Comment
Industrial General Permit
Deadline: 10/22/12 by 12 noon

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October 16, 2012

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



Subject: Green Diamond Resource Company Comments on the 2012 Draft Industrial General Permit

Dear Mrs. Townsend:

Green Diamond appreciates the opportunity to provide comments on the 2012 Draft Industrial General Permit. Our comments on the 2012 Draft Permit focus on the monitoring provisions. The current Industrial General Permit provides facility operators the ability to develop an Alternative Monitoring program that satisfies the minimum monitoring requirements and the objectives of the monitoring program. An Alternative Monitoring program must be approved by the Regional Water Board to ensure the alternative program would provide equivalent or more accurate indicators of pollutants and/or BMP effectiveness than the minimum requirements. The current Industrial General Permit states that "the State Water Board does not want to preclude facility operators from developing better, and perhaps more cost effective, monitoring programs." [Current Industrial General Permit, Order No. 97-03-DWQ, page XI]. In the 2012 Draft Industrial General Permit, the option to develop an Alternative Monitoring program has been dropped. Green Diamond believes the Alternative Monitoring provision should remain in the revised Industrial General Permit to provide the Regional Water Board and facility operators the flexibility to develop more effective and site specific monitoring programs. The State Water Board clearly recognized the benefits of this option in the Current Industrial General Permit and Green Diamond believes the Water Board should maintain that flexibility in the revised permit.

Respectfully submitted,

Gary C. Rynearson, Manager

Forest Policy and Communications