

Brent Redmond

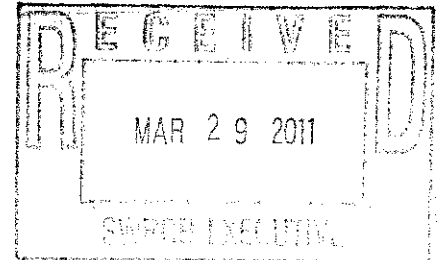
TRANSPORTATION

INC.

P.O. BOX 1359 • 1800 LANA WAY • HOLLISTER, CA 95024-1359 • (800) 777-5342 • (831) 637-5342

March 24, 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 Brent Redmond Transportation, Inc. in Hollister, 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.

Your new proposal will basically outlaw monitoring groups. We have been a member of the CTAMG monitoring group since the inception of storm water monitoring. By banning monitoring groups, you will take away the added layer of compliance review and the necessary education that our monitoring group provides to us. Participation in our monitoring group has strict criteria and anyone who does not comply with our monitoring groups' guidelines is dismissed.

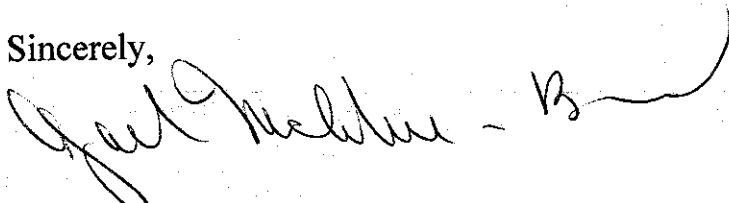
The new permit program will increase our annual costs tremendously. In the trucking world, our annual net profit is less than 2%. This added cost will drive more trucking companies out of business or out of the state. This proposed program adds an unnecessary financial burden to an already stressed industry.

There is no substantiated proof that a more stringent testing program for the trucking industry is necessary. No evidence exists showing need for this additional regulatory burden.

Our company takes storm water pollution prevention very seriously and has continuously strived to and succeeded in complying with all of 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,

A handwritten signature in cursive script that reads "Gael McAbee-Burns". The signature is written in black ink and includes a long, sweeping horizontal flourish at the end.

Gael McAbee-Burns
Safety Manager