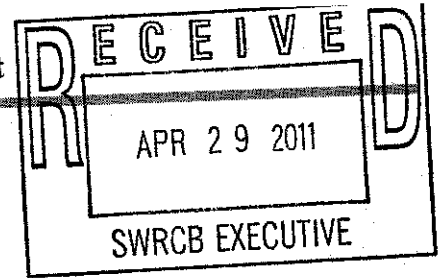


commentletters - Comment Letter-Draft Industrial General Permit



**From:** Pacific Emulsions Inc. <p.pacificemulsions@verizon.net>  
**To:** <commentletters@waterboards.ca.gov>  
**Date:** 4/29/2011 11:54 AM  
**Subject:** Comment Letter-Draft Industrial General Permit

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

### Comment Letter – Draft Industrial General Permit

Dear Water Board Commissioners:

This letter is in response to the proposed changes in the permit. As a business working in Santa Fe Springs, CA we have a number of concerns regarding the proposed changes. As a business we very aware of the environmental issues currently facing California and do our best to prevent pollution from leaving our site. We have contracted to a professional storm water company for the development of our storm water program and collect a majority of the storm water that falls on the site to be recycled into our emulsifying process. It is our hope the following concerns will be considered in your decision regarding the new permit and you will reconsider some of your proposed rules.

Our concerns are primarily in three areas. They are the new requirement that all businesses will have to get new SWPPP's certified by a qualified professional listed in your proposal, the designated storm water practitioner, and the sampling requirements. Our concerns are as follows:

#### **New SWPPP-**

We believe that our current SWPPP and program meets the proposed standards and feel the added expense of having to get a "certified" professional does nothing to further our operations in regards to successfully preventing pollution discharges. After talking with the consultant we originally hired to develop the program, we have discovered the SWPPP was designed to meet the proposed changes of the last proposed permit which are almost identical to the current proposal. Additionally, on at least a yearly basis we are inspected by the local storm water inspector who has not only evaluated our site but also the SWPPP. We would be happy to submit a copy of the SWPPP to the board and feel this is a better option than the one proposed.

#### **Qualified SWPPP Practitioner-**

In our SWPPP we have designated individuals responsible for our storm water program. We have a monitoring program in place that includes storm logs, pre-storm inspections, the required annual report records and training records. If this requirement is imposed we encourage you to make the program an internet based program as changes in personnel can cause issues and unnecessary costs of sending new people to training events.

#### **Sampling-**

In regards to sampling, our business has had concerns as we recently had the waterboard contact us for not sampling in the 08-09 storm year. We catch a majority of the rainfall and only have a very limited amount discharge in a sheet flow which has not been great enough to sample or has not qualified.

Gaining clarification on this issue is welcome. As far as the amount of sampling we believe it should remain the same. We also have concerns regarding the mixing of samples. As we have two short driveways where discharges occur that are equally split in regards to our industrial areas. Does the Board believe we are not competent enough to take equal samples and mix them together successfully? This requirement adds work and expense and does absolutely nothing to further success of a sample.

Thank you for considering our concerns and we hope you will use them in making your final decision. Please feel free to contact us for further information or with any questions you might have.

Sincerely, Jim Farnell  
Plant Manager