

SSI
SUPER STORE
INDUSTRIES

April 25, 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 Super Store Industries in Lathrop, 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.

As a business we are already taking responsibility in monitoring, implementing and following best practices and doing all that we can to protect storm water. All of our operations are under roof with our only exposure being fleet equipment. We keep our equipment clean and in good repair through routine maintenance checks and inspections. There is minimal exposure that a harmful substance will reach navigable waters through the storm drains on our property.

The more stringent permit will only increase our cost of doing business by requiring more sampling and increased work hours for the personnel responsible for monitoring, sampling and reporting.

We would also like to take this opportunity to urge the Board to forego the proposed elimination of group monitoring as the added layer of compliance review is beneficial and allows us to compare and contrast best management practices with others in like industries. In addition, group monitoring also helps to minimize the financial burden of managing the SWPPP.

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 black ink that reads "Kelly Durrer".

Kelly Durrer, Safety and Loss Control Manager
Super Store Industries

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