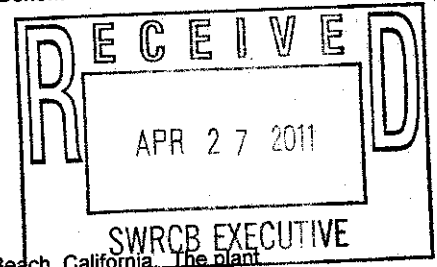


From: "Radigan, Patrick K" <PKRadigan@NationalGypsum.com>
To: "commentletters@waterboards.ca.gov" <commentletters@waterboards.ca.gov...
CC: "Wilson, Tony R (Long Beach CA Plant)" <tonyw@NationalGypsum.com>, "Bene...
Date: 4/27/2011 12:47 PM
Subject: Comments on DRAFT California General Industrial Permit

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



National Gypsum Company (NGC) operates a gypsum wallboard manufacturing facility in Long Beach, California. The plant operates as a member of a group of Companies covered by the stormwater permit issued to the Port of Long Beach (POLB). NGC has reviewed the subject Draft California General Industrial Permit and submits the following comments:

It has not been demonstrated that EPA benchmarks can be consistently achieved even with the installation of state of the art stormwater treatment systems.

Designing systems to treat a 10-year 24-hour storm event is extremely expensive and has not been shown to provide a significant water quality improvement over smaller design storms.

Group monitoring should be allowed when all dischargers in close proximity discharge to the same receiving water body. The benefits include consistency in methods and data handling, oversight, and cost sharing.

A specific conductance limit is inappropriate for Companies located in the POLB due to the influence of seawater.

The greatly increased monitoring and SW3P requirements of the new draft permit represents a significant increase in our facility's compliance burden, which will require hiring additional plant personnel or retaining expensive environmental consulting assistance. Estimates to revise the SW3P, conduct additional stormwater monitoring, as well as additional inspections and training could cost \$113,000 in the first year alone.

The estimated additional capital cost to construct a stormwater treatment system to treat our Long Beach plant site runoff to attain the Draft discharge standards would be in the neighborhood of \$1,785,000.

NGC appreciates the opportunity to submit comments on the subject DRAFT Permit. As a Company caught in the throes of the current historically unprecedented severe recession in the homebuilding industry, we can ill afford to expend scant financial resources on a stormwater management program that has little attendant environmental benefits. NGC looks forward to the favorable consideration by the Water Resources Control Board of the comments submitted herein.

Patrick K. Radigan
Director, Environmental Services
National Gypsum Company
pkradigan@nationalgypsum.com
Office Phone: (704)365-7538

Sustainability is a priority for National Gypsum - Please consider the environment before printing this e-mail.

NOTE TO RECIPIENT The foregoing message is sent from the National Gypsum Company email system, which is designed and intended to be used solely for communications relating to the business of the Company. Any matters covered or expressed in this email, or in any attachment hereto, which do not relate to the Company's business, are personal communications from the sender, and National Gypsum Company is not responsible for any such content