CAPITAL DRUM, INC.

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March 21, 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 Capital Drum Inc in Roseville, 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.

We believe that once the Draft Industrial General Permit is considered for implementation, it would create a negative impact on our company's future. At present, we have 70 employees who are entirely dependent on Capital Drum Inc for their family's source of livelihood.

Some of the most notable would-be effects of the implementation of the Draft Industrial General Permit are as follows:

- **Increased Costs:** the new permit will dramatically increase the annual costs associated with compliance. The SWRCB did not conduct a cost analysis or an Economic Impact Analysis prior to the release of the proposed new permit and Capital Drum Inc, in addition to several other impacted industries, are concerned that the anticipated spikes in annual costs will drive business out of California and/or force businesses to close their doors permanently.
- **Unqualified Regulatory Burden:** prior to the release of the proposed permit, the SWRCB did not draw any scientifically based conclusions that would justify the necessity of implementing a new permit that will impose a significant regulatory burden upon businesses in California. There is no existing evidence that shows that while the SWRCB employed a "Blue Ribbon" panel of academics, the panel acknowledged that they did not conduct any scientific research to support their claims that a new, more stringent permit is necessary.

- **Removal of Group Monitoring:** the new permit will effectively outlaw group monitoring in the state of California and will require all facilities under the new Industrial General Permit to meet the same requirements on an annual basis. The elimination of group monitoring will impact those CTA members who currently participate in the California Trucking Association Monitoring Group (CTAMG) and effectively remove the added layer of compliance review that CTA members have relied upon since 1993 when CTAMG was first established.
- **Violates Administrative Law:** The State Water Board has scheduled a hearing on the Industrial General Storm Water Permit and set a final comment deadline even though the very notice for this rule states that it is "currently not in its complete form." This is a violation of California and federal law.

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 giving us the opportunity to comment and for considering these views as you develop the final draft of the 2011 Industrial General Permit.

Sincerely,

Polly N. Camana
VP/Chief Operating Officer