

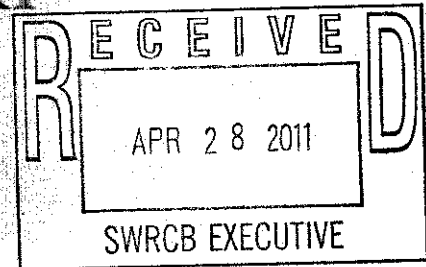


HUHTAMAKI

April 28, 2011

Sent via email: commentletters@waterboards.ca.gov

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



Subject: Comment Letter – Draft Industrial General Permit

Dear Ms. Townsend:

Huhtamaki, Inc. has been a sustainable business in the City of Sacramento since 1962. Huhtamaki has also operated a separate manufacturing facility in Los Angeles since 1954. We have complied with the General Permit for Discharges of Stormwater Associated with Industrial Activities since it was issued in 1997. Huhtamaki prides itself on being a sustainable company and supports protection of stormwater from pollutants, which protects our natural resources. In response to your request we are providing the following comments on the Draft Industrial General Permit that was issued on January 28, 2011 to replace the 1997 permit:

1. This permit goes above and beyond the corresponding 2008 USEPA Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity in many instances, and we believe it will pose an excessive burden on industry in the state. Huhtamaki estimates it will take an additional 100-200 hours per facility each year to fulfill the requirements of this permit beyond the requirements that would be imposed by simply adopting the USEPA MSGP.
2. The requirement to perform weekly inspections (described as an example minimum BMP) is excessive. Although our personnel already conduct these inspections regularly as part of their regular job functions, additional documentation would likely be necessary as proof of completion. If retained in the permit as a minimum BMP, the documentation of the weekly inspections should not be required and should be described as informal inspections completed during normal operations.
3. The requirement to document Ineligible Storm Events (less than 0.25 inches producing a discharge) is unreasonable. We fail to understand how the Board will be using this data, and why the dischargers should be obtaining and providing this data. If the Board is interested in completing a statistical evaluation on how many storms each year are non-qualifying, it can obtain precipitation data from existing weather stations rather than requiring the industrial dischargers to obtain it from the weather stations and provide it to the board. Similarly, information related to which storm events can produce

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discharges is commonly calculated using hydraulic engineering programs such as SWMM or Hydrocad, so that there is no need for industrial discharges to be tracking this information and providing it to the Board.

4. Pre-Storm Inspections are also unnecessary and would be excessively burdensome. As described in item 2 above, operational personnel already conduct informal inspections during routine operations, but additional documentation would likely be necessary as proof of completion. If retained in the permit as a minimum BMP, documentation of the Pre-Storm inspections should not be required, and this should be described as informal inspections completed during normal operations.
5. Requiring a qualified SWPPP preparer and a qualified SWPPP Practitioner is not necessary. The requirements in the MSGP are not sufficiently technical to require specific certifications.

Finally, we would like to note that Huhtamaki competes with manufacturing facilities throughout the United States and overseas. The environmental regulations in California are by far the most stringent in the nation, and the most costly to comply with. In these difficult economic times, we urge the Board to consider the overall costs of providing the increased benefits beyond the requirements imposed by the USEPA before finalizing this permit.

Sincerely,



Robert Braun
Senior Process Engineer/
Environmental Coordinator
Huhtamaki, Inc. - Sacramento



Robert A. Steeves
Environmental Manager
Huhtamaki, Inc.



Larry Eckhart
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