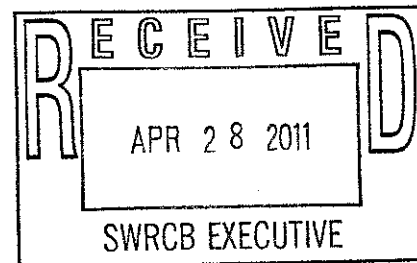


From: Ken Goss <ken@mwswire.com>
To: <commentletters@waterboards.ca.gov>
Date: 4/28/2011 3:35 PM
Subject: Comment Letter - Draft industrial General Permit
Attachments: MWS Wire with rooftop solar modules.JPG



MWS Wire Industries is a small business employing 45 people and a registered permittee under the statewide general permit since 1992. Since then we have met the requirements of the permit in every detail and are confident going forward that our business will continue to fulfill its obligations under revised regulations when they are finalized.

MWS Wire welcomes the opportunity to offer these comments on the draft General Permit:

1. The requirement that a QSD be a registered civil engineer, geologist, landscape architect or hydrologist is burdensome and costly, requiring permittees such as MWS to hire a novice to our business and facility to formulate a SWPPP when our personnel already have 19 solid years of experience doing this work. Businesses like ours comply with myriad environmental laws and regulations and our staff complete many hours of training to do so. The draft regulations are not more complex than those imposed by the SCAQMD, DTSC, Cal-OSHA, the local CUPA and so on. There is no objection to regulations that require training and certification but restricting the qualified field for QSD to four types of registered professionals makes little sense for permittees whose facility design and limited exposure to industrial activity greatly simplify storm water management and pollution prevention.

Consider that under the new proposal, permittees must maintain accurate, calibrated pH and conductivity meters and rain gauge ready to go year round. Personnel capable enough to do this who also have years of knowledge and experience operating a business in our highly regulated environment are very capable of preparing, writing and revising a suitable SWPPP to manage storm water runoff at their own facility that consists of a building, dumpster enclosure, lawn and landscaping and a parking lot [see attached photo - our building has the PV solar modules on the roof].

2. Under the current general permit dischargers with our SIC code can opt out of sampling and analysis for copper and zinc by providing a legitimate explanation that may be confirmed by routine inspection. The proposed permit requires testing for them whether storm water exposure to these metals can be reasonably expected or not. The only sources of zinc at our facility are permanent fixtures such as galvanized chain link fencing. Copper wire is handled and processed indoors and no copper particulate is generated that could contaminate storm water discharge. Mandatory quarterly testing for "Additional Analytical Parameters" is a significant potential waste of time and resources for permittees statewide so we suggest implementation of a verifiable "No Exposure" declaration as an option to sampling and analysis for these parameters.

3. Section X.G. of the draft permit order states that all locations that discharge storm water associated with industrial activity shall be sampled. Please clarify whether this requirement would include low volume sheet flow from an employee parking area.

4. The following editorial corrections to the draft order are offered:

Page 5, change "Laotian" to "Lahontan."

Page 27, correct spelling of "COMPLIANCE" in the section I. heading.

Thank you for the opportunity to comment.

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Operations Manager

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