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To: <commentletters@waterboards.ca.gov>
Date: 4/28/2011 11:30 AM
Subject: Subject: Comment Letter – Draft General Industrial Activity Stormwater Permit

April 28, 2011

California State Water Resources Control Board
Electronic Mail:

1001 I Street, 24th Floor
commentletters@waterboards.ca.gov

Sacramento, CA 95814

Attention: Jeanine Townsend, Clerk to the Board

Subject: Comment Letter – Draft General Industrial Activity Stormwater Permit

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Dear Ms. Townsend and Members of the Board:

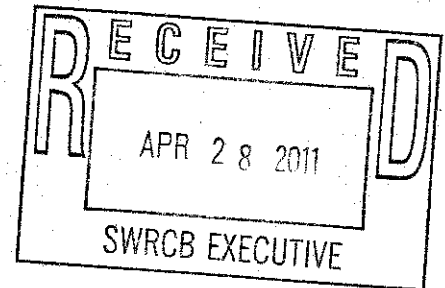
On behalf of Cal-York Distribution, we are providing comments relative to the Draft General Industrial Activity General Permit (GIASP). Our business has a facility located at 3355 East Slauson Ave., Vernon, California, 90058. Our business appreciates the State Water Board's efforts in proceeding to revise and reissue the GIASP. As residents of California we understand the importance of water quality and the role of the GIASP. However, based on our review, we clearly foresee that this permit will have detrimental affects on the business community statewide. As you may already know, operating a business in California is a delicate regulatory balancing act which is why we find it critical for our company to provide comments for the draft GIASP. As the draft permit is written, conducting business in California may no longer be feasible for our company. We have one main concern that we request the State Water Resources Control Board to reconsider;

Section XXI., titled Conditional Exclusion - No Exposure Certification, indicates that the No Exposure Certification (NEC) shall be submitted to the Regional Water Board on an annual basis. In addition, the draft GIASP suggests that the annual NEC fee will be a minimum of \$200. Compared to the current submittal requirements for a Notice of Non-Applicability (NNA), this proposed requirement for an NEC is clearly excessive. We suggest that the NEC requirement be revised to reflect the current submittal requirements for an NNA which is 1) Required to be submitted once (unless there is a change in industrial activity), and 2) No fee required with NEC submittal.

We appreciate this opportunity to comment on statewide general NPDES permit.

Regards,

Ron Anavim
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