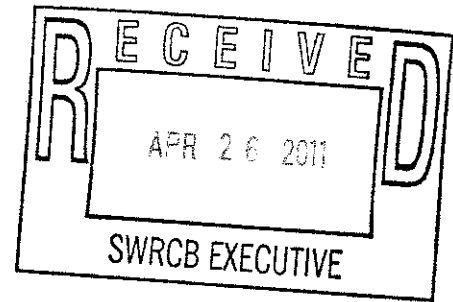




4/18/2011

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 Trench Plate Rental Company in Downey, 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.


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.

We are a construction rental equipment supplier with thirteen (13) permanent storm water monitoring locations in California. We have been enrolled in California Trucking Association storm water monitoring group for several years now. We joined their group after struggling for years to monitor it ourselves. My experience with the challenges faced with managing it ourselves had been with not only staying current on the changing regulations but ensuring all locations were following the program. I have attended many SWPPP seminars and networked with many companies facing these same challenges. I can't express enough just how helpful it's been to our organization to be in CTA's Storm Water monitoring group assist us with managing our SWPP.

Upon reading that you intend to remove this vital resource (monitoring groups) it's mind boggling to me that you would jeopardize compliance of the very regulation you wish to improve compliance of. The proposed change of increasing the quantity of samples will only increase costs to an already struggling business economy without increasing compliance of the program. The last seminar I attended it was reported that less than 30% of California businesses that qualify for the regulation were enrolled in (or had knowledge of) the Storm Water program. I would think you would focus your attention on increasing participation in the program before imposing greater burden on those who are doing their part to comply. Monitoring groups assist organizations with ensuring compliance with the regulation that we've found to be a cost effective resource. The monitoring group saves us money and assures compliance with the regulation. I recommend that you seriously reconsider these changes.

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

Sincerely,


Tom Lyon
Regional Operations Manager
Trench Plate Rental Company