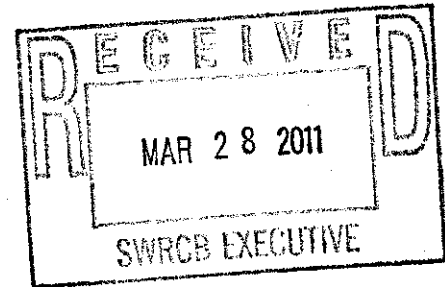




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March 23, 2011

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



Subject: Comment Letter – Draft Industrial General Permit

Via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Dear Ms. Townsend and State Water Board Representatives,

Meissner Filtration Products, Inc. manufactures filter cartridges and biocontainers used for the sterilization and storage of pharmaceutical and biotech drugs and intermediates. We are located in the county of Ventura and city of Camarillo. The city of Camarillo has done an outstanding job of educating management at Meissner on the requirements necessary to prevent industrial activities and materials from entering storm water discharges.

After reviewing the latest draft permit, I would urge you to reconsider the need for companies filing No Exposure Certifications to do so on an annual basis (reference Attachment C, Conditional Exclusion – No Exposure). Although I agree that it's important for businesses to evaluate and report changes in their operating conditions which might alter their No Exposure status, I would propose that the existing filing of paperwork with our local cities is a much more efficient process for ensuring compliance. Camarillo already requires periodic documentation to be submitted so redundant filing of the NEC does not add additional benefit and is certainly disproportionate to the cost and effort. Additionally, the city of Camarillo inspects and educates local businesses which I would like to propose as a much more efficient way of ensuring compliance with federal requirements.

For those businesses located in unincorporated areas that do not have the same level of monitoring as Camarillo, the current draft proposal of requiring annual filing of the NEC may be necessary. However, for the significant number of businesses in compliance and already coordinating with local agencies, I would urge you to make every effort to avoid a duplication of effort and costs. This could easily be handled by asking a question at the bottom of the NEC form for the name of the local agency that is currently coordinating with the business in question to ensure storm water compliance. If no agency is named, the form would only be valid for one year. If a local agency is named, I would propose the NEC remain valid until revoked. Thank you for your consideration and attempts to ensure compliance as efficiently as possible.

Sincerely,

Christopher Meissner  
President  
Meissner Filtration Products, Inc.

cc: Anita Kuhlman, Stormwater Program Manager, City of Camarillo