



From: Dana Somesla <dana@kem-tek.com>
To: "commentletters@waterboards.ca.gov" <commentletters@waterboards.ca.gov>
CC: Elvia Angulo <elvia@kem-tek.com>, Debbie Schonk <deb@kem-tek.com>, JohnC...
Date: 4/25/2011 1:06 PM
Subject: storm water pollution prevention plan, general permits

To Whom It May Concern;

We had our local agency inspection today and we were informed of the new changes being proposed as the current general permit that is scheduled to expire. We discussed and I have looked upon the changes being proposed and it would appear once again the goal of the government is the destruction of all industry in California. The one size fits all approach that is evident in the new regulations is unmanageable for a company of our size and the fact that rain is a rarity in our region. So now we need to add electronic monitoring, increase the frequency of observations and sampling and all for what? Has our company ever been accused of pollution through our storm water discharges? Not by any records we know of, yet the new regulations are onerous and expensive to comply with without any indication as how this helps related to our property. Up until now we have been able to deal with the regulations and manage the program without hiring expensive and questionable consultants and services. The proof has been in the annual reports that we have submitted from the very beginning of the program. There needs to be some categorization of the permit requirements based on factors such as company size, history, average rainfall and activities. Without these there can't be a scaling up of requirements. Does anyone writing these regulations have any experience actually operating a business? Over and over again we get caught in this unfair regulatory trap, certainly it's easier to write and enforce one set of regulations, but without reasonable exceptions we are forced to comply with regulations that force us to inspect and report about the nothings that happen all because it makes it easier for the regulators. So now every week instead of once a month we look at the same old dried out landscape to keep the government happy? Even now when we haven't had enough rainfall to generate the two minimum annual storm water samples, we have to provide a written justification. Now it looks like for at least nine months a year we will need to repeat this lack of sampling requirement over and over. How does the department concern itself with forcing precious manpower to be used in such a frivolous manner? More than likely it's not a concern at all.

Please forward these comments wherever appropriate, but from our perspective this is what the government wants and no matter how negatively it affects businesses, and no matter that little to no good results, it will happen. The crush continues until all the life has been squeezed out of all but the biggest businesses. It just comes from so many directions that we always seem like we are one regulatory mistake away from the roof collapsing from all the government burdens we deal with on a daily basis. Every agency thinks what they're doing is critically important, and that's all the agency does so there's no focus outside of its activities, so it becomes all important. The joke is that each agency is only about 5% of our requirements for compliance and the 20-30 agencies we deal with keep adding regulations have to be treated equally with the 5% we have to give to each. Just keeping up has become a losing effort because we are no longer being directly provided with the information, but rather are forced to spend time searching that could be used to operate the business just to try and see if anything has or will soon be changed that could cause a compliance violation and all the punishment that follows.

So one voice isn't likely to make a bit of difference, but we would only have ourselves to blame for not speaking up when an injustice is about to be incurred. You now know you scare us daily because we have suffered the indifferences of the government on a regular basis and there appears to be no end in sight when no more regulations are needed.

Dana Wm. Somesla, Chemist
CHEM LAB PRODUCTS
5160 E Airport Dr
Ontario, Ca 91761
909 390-9912

