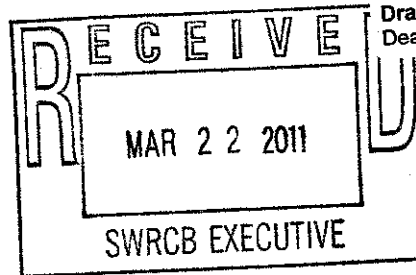


March 17, 2011

Jeanine Townsend
Clerk to the Board
STATE WATER RESOURCES CONTROL BOARD
1001 I Street, 24th Floor
Sacramento, CA 95814



Public Comment
Draft IGP
Deadline: 4/29/11 by 12 noon



RE: Comment Letter - Draft Industrial General Permit

Dear Ms Townsend:

These comments are written in response to the State Water Resources Control Board's (SWRCB) proposed 2011 Draft Industrial General Permit for storm water discharges. I am writing on behalf of Ventura Transfer Company of Long Beach and the 80 families who depend on Ventura Transfer Company for their livelihood. We have a number of concerns regarding the proposed regulations and hope you will carefully consider our comments.

2418 E 223rd Street
Long Beach, CA 90810
venturatransfer.com

TEL 310.549.1660
FAX 310.835.9175

- **Increased Costs:** The new permit will dramatically increase the annual costs associated with compliance. I understand the SWRCB did not conduct a cost analysis or an Economic Impact Analysis prior to the release of the proposed new permit. My trade association is anticipating, at the very least, a 1000% cost increase for businesses within the trucking industry. The costs to operate in California continue to mount putting at risk our business and the businesses we serve. The media reports we are on the verge of economic recovery, but my business has not seen it, and this will do nothing to enhance the efficiency or competitiveness of my company.
- **Unqualified Regulatory Burden:** I am told that the SWRCB employed a "Blue Ribbon" panel of academics, but they did not conduct any scientific research to support their claims that a new, more stringent permit is necessary. In the absence of such scientific research I question the necessity of implementing a new permit that will impose a significant regulatory burden upon businesses in California.
- **Removal of Group Monitoring:** The new permit will effectively outlaw group monitoring and will require all facilities under the new Industrial General Permit to meet the same requirements on an annual basis. As a small business I rely on my trade association (The California Trucking Association) to assist with my compliance through the group monitoring program.
- **Violates Administrative Law:** The State Water Board has scheduled a hearing on the Industrial General Storm Water Permit and set a final comment deadline even though the very notice for this rule states that it is "currently not in its complete form." This is a violation of California and federal law.

Our company takes storm water pollution prevention very seriously and strives to comply with all of the requirements in the current permit. We urgently request that before the SWRCB make such drastic and costly changes to the regulations a thorough scientific review and cost-benefit analysis be conducted to demonstrate the need before California business is burdened further during these trying times.

Sincerely,

VENTURA TRANSFER COMPANY


Randall J. Clifford
Chairman