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February 18, 2005

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

**Re: Revised Comments of Mineral Associations Coalition (MAC) Regarding
Reissuance of the Storm Water Industrial General Permit**

Dear Ms. Irvin:

The Minerals Association Coalition (MAC) provided comprehensive comments on the proposed permit in a letter dated February 2. This letter clarifies those comments with respect to one portion pertaining to specific minimum best management practices for "cover" (section VII.8.i.(4)).

As stated in our letter on pages 7 and 8, we believe there are a number of reasons that cover would be problematic for stockpiled materials at aggregate and mineral production facilities, and support our original proposal and rational. However, we also offer for the Board's consideration the language below to clarify that alternatives are permissible where cover is problematic (changes and additions in italics).

Section VII.8.i.(4) "Cover all stored ~~industrial~~ *significant* materials that can be readily mobilized by contact with storm water. *For facilities with permanent outdoor storage or stockpiles subject to on-going use and/or mechanized activity, alternative BMPs are acceptable in order to meet storm water goals and prevent disruption of operations. Examples of such alternatives might include grading the storage area to prevent run-on, or treatment control, such as an infiltration basin, a detention basin, or a silt fence or straw bale fence (except for entry and exit points for the silt fence and straw bale fence).*"

We appreciate your consideration of our comments, and would be available to discuss any questions you may have.

Sincerely,

Linda A. Falasco
CMAC

Steve Bledsoe
SCRPA

Adam Harper
CMA

