



INTERSTATE BRANDS COMPANIES

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February 14, 2005

VIA FACSIMILE 916-341-5620
Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
1001 I Street 245h Floor [95814}
PO Box 100
Sacramento, California 95812-0100

Re: Comments on Draft Industrial General Permit

Dear Ms. Irvin:

The purpose of this letter is to express Interstate Brands Corporation's (IBC) concerns regarding the draft general permit referenced above.

IBC's biggest concern is the tacit assumption of the regulations that storm water effluent quality resulting from runoff from an industrial property is SOLELY the result of industrial practices. It is well documented that acids and organics in storm water are significantly impacted by atmospheric deposition. Likewise, particulate dust from Freeways has been widely documented to contain relatively high concentrations of organics and metals. It is conceivable that a facility's runoff could exceed benchmarks solely from these inputs, which are beyond the manufacturer's control. Most if IBC's California facilities are located next to freeways.

In IBC's opinion the regulations as drafted are inconsistent with goals outlined in pages 1 through 3 of the Draft General Permit. Specifically, on page 2 of the draft, it states "BMPs...are appropriate in lieu of numeric limitations." However, the permit regulations result in "de facto" effluent limitations from the EPA's "benchmarks".

Finally, IBC's opinion is that a number of the monitoring requirements are inefficient, subjective, and offer little environmental benefit. Specifically the requirement for each permit holder to keep a record of every rainy season storm event and inspections prior to "anticipated" storm events. IBC believes this requirement will result in wasted labor for little environmental benefit.

Sincerely,

Steve Guenin
Director of Environment
Interstate Brands Corporation