

FROM : VALLEY PATTERN & MFG., INC.

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**Valley Pattern & Mfg., Inc.**

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AL JOHNSON, President  
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Storm Water Panel Report  
Deadline: 8/4/06 5pm

July 19, 2006

State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Attn: Song Her, Clerk to the Board

Subject: Comment Letter - Storm Water Panel Report

Dear Ms. Her:

We operate a small non-ferrous foundry that is now in its 71<sup>st</sup> year in the State of California. We belong to an association called the California Cast Metals Association and because of our membership in this organization have been kept very current with what we needed to do to meet the requirements of California. Therefore, we have the proper permit, a SWPPP, and we file annual reports as required. The costs of doing all of these requirements has been substantial when you consider our size.

In January 2005 we attended a meeting in Sacramento that discussed the new permit that was to be issued. This process was turned over to a Blue Ribbon Panel which brings us to where we are today. Unfortunately, because of some serious knee problems I'm unable to attend today, but do appreciate the opportunity to present some comments to the Board.

In 1992 we were informed of the serious consequences that could happen to us if we didn't implement a SWPPP. Because of our concern sixty-three foundries in California formed a group and with the help of the appropriate people we put together a plan that met all of the requirements. It was some great surprise to me that some two permits, and 10 years later, that we found that it was only now that the State was getting around to enforcing the requirements of the Permit and even then they were concentrating on companies that already we meeting the requirements. We would suggest to you that the first requirement would be to make sure that the enforcement of the current law be given priority. You, of course, know what SIC codes must have storm water permits so we would think it would be simple to check what companies in these codes do not have a permit thus finishing this unfilled task.

Secondly, we are very concerned about incorporating numeric effluent limits into the storm water permits. At the January 2005 we listened to some very learned men tell the



meeting that the Bench Mark numbers were numbers that were not based on any real study. We would contend that before this panel adopts these numeric effluent limits these numbers need to be backed up with some real numbers. We know that the limits on Zinc are impossible to meet not because of what we process, but because we are located in a metal galvanized building and every time rain strikes our building a certain amount of Zinc is removed and that amount is high enough to make us exceed the limits.

When our group was formed we had 63 members and now we have 42. Where did those twenty-one companies go? They didn't fail because of poor business practices, but rather they either left the state or closed because they no longer wanted to continue their business in this state. We are now in the same position. We have been in a business that operated on very low margins, but we pride ourselves on the quality of the parts we produce along with our ability to provide our workers with decent pay and benefits.

Again we appreciate the opportunity of providing you with some of our thoughts and can only hope that you will recognize that implementing plans without sufficient data will only cause harm to business in this state.

Very truly yours,

VALLEY PATTERN & MFG., INC.



Eric Johnson  
President