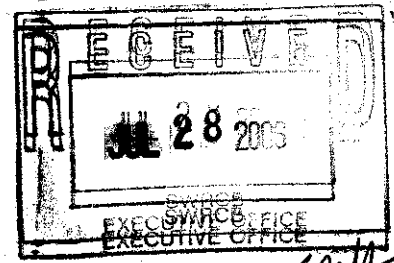


Storm Water Panel Report
Deadline: 8/4/06 5pm



July 26, 2006

Tam Doduc, Chair
State Water Resources Control Board
Office of Chief Counsel
1001 "P" Street, 22nd Floor
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Comment Letter – Stormwater Numeric Limits Implementation

Dear Ms. Doduc:

The California Manufacturers & Technology Association believes that there were several findings of the Storm Water Panel Experts' Report which should definitely be taken into consideration by the Board as it moves forward:

While the Panel found that numeric storm water limits are feasible in some instances, they also stated that the State Water Resources Control Board's (SWRCB) database is inadequate in describing current emissions by industry type or category and does not contain the information necessary to determine the effectiveness of current Best Manufacturing Practices (BMPs). The report recommends that the SWRCB develop a monitoring program and collect the data vital to establishing meaningful, practical and achievable standards. This should include new data beyond the conventional constituents.

The Board should consider the economic impact additional monitoring and data collection will have on industries in California. This facet is extremely important due to the fragile economic stability of most California industrial facilities. These companies are already faced with the highest energy, taxes and regulatory costs in the nation.

Where information is available, the Board should establish action levels that can be used to characterize the performance of BMPs. It is important that action levels or benchmarks remain non-enforceable targets to be used as a measure of BMP effectiveness. This approach is consistent with the current US EPA multi-sector permit program, the program developed by the California Stormwater Quality Association and the current draft of the SWRCB's General Industrial Storm Water permit, issued last year.

In addition, CMTA believes that the SWRCB should provide guidance to the regional boards which have "jumped the gun" already implementing often unrealistic, unachievable storm water standards. Uniform storm water policy is badly needed.

Sincerely,

Michael J. Rogge
Director, Environmental Policy