

April 5, 2011

Mr. Charles R. Hoppin, Chair
State Water Quality Control Board
1416 Ninth Street, Box 944209
Sacramento, CA 94244-2090

Dear Mr. Hoppin:

Thank you for the opportunity to comment on the Draft Industrial General Permit. As a permit holder on four industrial sites (Airport, Corporate Yard, Landfill and Wastewater Reclamation Plant) the City of Lompoc has a strong interest in ensuring the provisions of the Industrial General Permit are feasible, achievable and protective of water quality.

The City is concerned with the proposed increased requirements for daily documentation and record keeping, the doubling of sampling requirements, the requirement for daily sampling during storms at Landfills, as well as the need for new equipment and specialized staff to write and administer the storm water programs at each of our industrial sites.

As these new record keeping, sampling and data requirements are not directly linked to the implementation of water quality protective measures and Best Management Practices, it is not clear that the provisions of the Draft Industrial General Permit will result in any increase in, or protection of, water quality. It also does not appear that the specific storm water conditions and issues associated with the varied types of industrial operations being permitted are adequately addressed by this one-size-fits-all permit.

Each of the additional requirements imposed by the Draft Industrial General Permit will come at significant cost in both staff time and implementation expense to the industrial permittee. At a time when cities and private industries are looking at every possible cost-cutting measure to reach a balanced budget, these additional costs and requirements constitute a substantial unanticipated financial burden.

Thank you again for the opportunity to comment on the Draft Industrial General Permit. A more detailed itemization of the City of Lompoc's concerns is attached.

Sincerely,

John H. Linn
Mayor, City of Lompoc

Attachment A: [City of Lompoc Comments on the Draft Industrial General Permit](#)

cc: Lompoc City Council