



**SWANA**<sup>®</sup>

SOLID WASTE ASSOCIATION  
of North America

**CALIFORNIA CHAPTERS**

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February 16, 2005

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

**RE: Comments on the Reissuance of the National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated with Industrial Activities Draft dated December 15, 2004 (Draft Permit)**

The Solid Waste Association of North America (SWANA) is composed of approximately 7000 public and private sector solid waste management professionals throughout North America dedicated to the development and enhancement of environmentally and economically sound practices and policies for the integrated management of municipal solid waste. There are approximately 900 members of SWANA in California.

The California Chapters of SWANA are submitting these comments on the Draft Permit issued December 15, 2004 as a supplement to the comment letter dated February 3, 2005, from industry stakeholders to which we were signatories and in support of the comments made by the Los Angeles County Sanitation Districts.

There are several areas that we feel are of high importance and should be addressed. These are explained in more detail in the attached letter.

- Receiving water limitations
- Use of EPA benchmarks
- Sampling
- Laws regulating landfill operations

We are in complete agreement with and supportive of the comments made in the attached letter. The primary concern most often repeated is that the EPA benchmarks will act as numerical discharge limits with which not all landfills will be able to comply. Satisfaction of these benchmarks may also conflict with other landfill requirements. Our members concern with the proposed revisions is further outlined in the attached letter.

Thank you for this opportunity to submit comments. I look forward to working with you on the concerns mentioned above. Feel free to contact me at your convenience at (916) 446-4656.

Sincerely,

Yvette Gómez Agredano  
Legislative Advocate  
SWANA, California Chapters

cc: Will Dickinson, Chair, SWANA Calif. Chapters, Legislative Task Force  
Mark Urquhart, Secretary, SWANA Calif. Chapters, Legislative Task Force