



U.S. Chamber of Commerce

January 23, 2025

Ms. Benita Best-Wong
Acting Assistant Administrator for the Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Request for Withdrawal of the Proposed National Pollutant Discharge Elimination System (NPDES) 2026 Issuance of the Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity; EPA-HQ-OW-2024-0481

Dear Acting Assistant Administrator Best-Wong:

The U.S. Chamber of Commerce urges the Environmental Protection Agency (EPA) to withdraw the December 13, 2024 proposed Multi-Sector General Permit (MSGP) for industrial stormwater discharges. The Agency should at the very least extend the comment period by sixty days to allow the regulated community to properly analyze the docket.

We are aligned with many of the issues raised by the Small Business Low Risk Coalition and are concerned regarding the potential for significant costs and unintended consequences on our member companies, especially small businesses. EPA has an opportunity to advance its new deregulatory goals by issuing a revised proposal that conserves environmental protection provisions that have worked well for decades and eliminates costly recent permit additions that have no evident benefits or basis in data.


Following are recommendations for your consideration:

- Provide an opportunity for public notice and comment similar to other reauthorizations of the MSGP.
- Incorporate flexibility into the approach that supports the broad importance of the general permit programs.
- Promote a thorough re-examination of this proposal, using the Executive Order 12866 review process to ensure interagency review for potential improvements to the program.
- Implement the required Small Business Regulatory Enforcement Fairness Act panel to ensure comprehensive input and evaluation of the costs from small entities across the country. We encourage the Agency to collaborate with the Small Business Administration's Office of Advocacy in their roundtable on the MSGP issue, scheduled for January 30, 2025.

We suggest the Agency convene a series of dialogues with the business community to identify an effective path forward. In the meantime, the Chamber again respectfully requests that EPA withdraw the current MSGP proposal.

Please feel free to contact us with questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Chuck Chaitovitz". The signature is written in a cursive style with a large, sweeping initial "C" and a long horizontal flourish extending to the right.

Chuck Chaitovitz
Vice President, Environmental Affairs and Sustainability
U.S. Chamber of Commerce