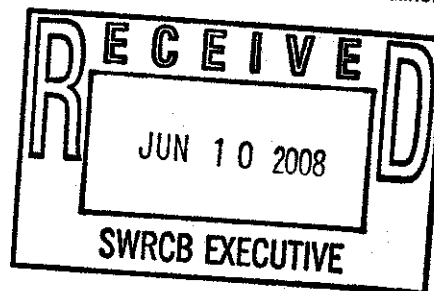


Public Comment
Draft Construction Permit
Deadline: 6/11/08 by 12 p.m.

June 10, 2008

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Reference: Public Comment for the California Construction General Permit

Dear Ms. Townsend,

My name is John Hall and I'm the producer of the National Stormwater Summit and the publisher of BMP Today. The goal of our events and publication is to educate all parties interested in compliance issues related to environmental regulations. We have worked with the EPA, state, local and various transportation agencies across the country. We have also sat at the same table with developers, environmental advocacy groups and regulators seeking solutions that can keep the economic engine running while practicing responsible environmental stewardship.

One very significant corporate social responsibility topic related to the building industry that has proved to be a serious environmental protection issue is the proper containment of concrete washout waste water. Numerous heavy metals including *cancer causing Chromium 6* has been detected in concrete washout waste water. If we do not completely contain these pollutants it would be a serious public health concern.

In addition to the heavy metals and Chromium 6 found in this waste water, the ph levels border on toxic waste. Any language written that doesn't direct the public on how to properly contain and dispose of concrete washout waste water would leave all concerned including the general public at risk. This has become a risk management issue as well as an environmental call to arms. Containing this waste water in water tight structures and disposing of same water in a manner where it cannot be discharged into the waters of California would be a risk management solution welcomed by the general public and the environment.

If society is responsible for creating this pollutant then society is responsible in containing this pollutant! Anything less than using best practices that completely protects human health, wildlife and the overall environment would be socially irresponsible. The public entrusts the State Water Resources Control Board to protect the precious asset of water, but also relies on experts like yourselves to assure permits and regulations are outlined that protects the health and well being of the citizens of California.

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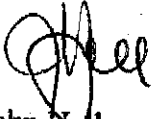
In recent discussions with the EPA regarding their upcoming new NPDES permit, the importance of a water tight containment BMP and the proper disposal of concrete washout waste water is priority. If the National EPA permit is headed toward a water tight containment required BMP for concrete washout waste water and proper disposal of same, I would encourage the great state of California to be working with the EPA as we move into a more environmentally focused political landscape. California has always been a leader in environmental issues. If concrete washout waste water and all of the pollutants associated with this construction practice are allowed in any way to come in contact with the California waterways and even soil, dirt or sediment it would be a health issue not reflective of the good works the state has done to protect its citizens and the environment.

Caltrans recently issued a construction specification that included a water tight concrete washout containment BMP, illustrating that the largest concrete user in California sees the need to contain this pollutant. As an individual who spends all of my professional time on water and soil protection issues, I commend Caltrans for their decision to require BMPs that protect the health of their workers, the general public and the environment. I hope that the State Water Resources Control Board will stand side by side with a fellow agency and write into the upcoming permitting process the containment of concrete washout water in a water tight and sealed system and the disposal of this pollutant to the proper waste water facilities. The above mentioned water tight containment system required by Caltrans also gives them the ability to recycle the solid concrete waste for numerous other uses. This forward thinking BMP helps divert large amounts waste from our landfills.

California is represented by lawmakers such as Sen. Barbara Boxer and Rep. Henry Waxman who both chair the committees that oversee the EPA and Sen. Dianne Feinstein who has long been a proponent of environmental issues. California has proven to be a leader in good environmental stewardship and while addressing containment and disposal of concrete washout waste water is one of many issues at hand, it is a human health issue not to be taken lightly as you finalize the California Constuction General Permit.

Thank you for your commitment in the preserving the California waterways and protecting the environment and human health.

Very truly yours,



John Hall