



SPECIAL HEARING
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cc: BD, DI, DWQ
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California Stormwater Quality Association

"Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation"

February 18, 2005

Debbie Irvin, Clerk to the Board
Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Recommendations for the Revision of the Industrial General Permit, Water Quality Order No. 97-03-DWQ

Dear Ms. Irvin and Members of the Board:

On behalf of the California Stormwater Quality Association (CASQA), thank you for the opportunity to provide comments regarding the reissuance of the current General Permit for Storm Water Discharges Associated with Industrial Activities, Water Quality Order No. 97-03-DWQ (General Permit). CASQA has been working with staff over the last several years to develop recommendations for the reissuance, and we previously provided written comments in November 2002 and again in June 2003.

CASQA is composed of stormwater quality management organizations and individuals, including cities, counties, special districts, industries, and consulting firms throughout the state, and was formed in 1989 to recommend approaches to the State Water Resources Control Board (State Board) for stormwater quality management in California. In this capacity, we have assisted and continue to assist the State Board with the development and implementation of stormwater permitting processes.

CASQA's Industrial Subcommittee identified several areas of the 2004 draft General Permit, issued December 15, 2004, that could be improved in the planned 2005 reissuance. To this end, our recommendations are crafted to achieve the following objectives:

- Identify achievable improvements in the stormwater program elements;
- Simplify and streamline the permit format;
- Provide our initial recommendations regarding numeric effluent limits;
- Clarify the intent and use of benchmarks;
- Provide sufficient flexibility to accommodate the diversity of the industrial activities covered by the General Permit;
- Conform with U.S. Environmental Protection Agency (USEPA) Phase II requirements, and;
- Address some of the initial concerns that may be raised by other interested parties.

We feel confident that our recommendations accomplish these goals.