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Public Hearing
Draft Industrial General Permit
Deadline: 9/19/13 by 12 noon



September 13, 2013

Directors

Joseph L. Campbell
President

Karl L. Wandry
Vice President

Bette Boatman
Lisa M. Borba
John A. Burgh

Jerry Brown
General Manager

Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Subject: Comment Letter- Final Draft NPDES Industrial General Permit issued on July 19, 2013

Dear Ms. Townsend and Members of the Board:

Contra Costa Water District (CCWD) appreciates this opportunity to comment on the Final Draft Statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Activities Associated with Industrial Activities (Industrial Permit).

CCWD provides water to about 500,000 people in central and eastern Contra Costa County. As a public drinking water agency whose source water is the Sacramento-San Joaquin Delta, we understand the importance of and support the protection of surface waters from industrial facilities' storm water runoff. The Sacramento-San Joaquin Delta, as are all waters of the United States, is a precious resource that must be protected and managed properly. As a regulated entity that is subject to the Industrial Permit, CCWD applauds the effort of the Board staff to develop a permit that we believe provides sound and reasonable requirements to protect surface waters. The Board staff has shown tremendous dedication and commitment throughout this difficult and challenging task.

At this time our only comment pertains to the proposed Industrial Permit effective date of January 1, 2015. CCWD believes that the proposed effective date creates an overlap of the annual reporting period with the current permit, which has a reporting period from July 1 to June 30. As a result, a scenario is created where two different annual reports in two different reporting formats would be required for the same reporting period. CCWD believes this issue is a minor oversight that can easily be resolved by changing the Industrial Permit proposed effective date to June 30, 2015.

Ms. Jeanne Townsend

September 13, 2013

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Thank you for this opportunity to submit this comment letter. Should the Board staff have any questions regarding this comment letter, feel free to contact me at (925) 688-8023.

Sincerely,

A handwritten signature in blue ink, appearing to read "David A. Omoto", with a long horizontal flourish extending to the right.

David A. Omoto
Environmental Compliance Officer

DAO:dao