



DEPARTMENTS OF THE ARMY AND THE AIR FORCE
JOINT FORCE HEADQUARTERS
OFFICE OF THE ADJUTANT GENERAL - CALIFORNIA NATIONAL GUARD
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SACRAMENTO, CALIFORNIA 95826-9101

January 24, 2006

Directorate Environmental Programs

Ms. Selica Potter
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814



SSO Hearing: 2/8/06

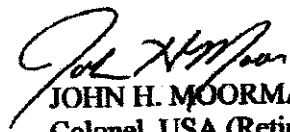
Dear Ms. Potter:

The California Army National Guard Environmental Programs Directorate has finished reviewing all the documents related to the Draft Statewide General Waste Discharge Requirements (WDRs) Order No. 2006 – and we offer the following comment:

Language should be added to the Draft WDRs Order No. 2006- to exempt facilities that have routine operations substantially below maximum capacity and are currently in compliance with required monitoring and maintenance of their system. All three of the California Army National Guard facilities that would be subject to the revised WDRs were designed to operate under peak loads at full occupancy. We feel that the revised WDRs targets facilities that are in compliance and are satisfactorily performing monitoring and maintenance required under their industrial wastewater discharge permits issued by sanitation districts. The revised WDRs would effect change to only a small number of wastewater systems that are having sanitary sewer overflows and require updating and or modification to meet increased demands due to population increases.

Please feel free to contact Michael Holder at (916) 361-4338, if you have any questions related to this letter.

Sincerely,


JOHN H. MOORMAN
Colonel, USA (Retired)
Director, Environmental Program

CC: BG Combs
COL Ellsworth
COL Smith
LTC Fisher