



## California Stormwater Quality Association®

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

July 31, 2015

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board



Subject: Comment Letter – Submittal Deadline for the Industrial General Permit

Dear Ms. Townsend:

The California Stormwater Quality Association (CASQA) appreciates the opportunity to provide comments on the State Water Resources Control Board's (State Water Board) proposed amendments to the General Permit for Storm Water Discharges Associated with Industrial Activities, Order 2014-0057-DWQ (Industrial General Permit). CASQA is a nonprofit corporation with approximately 1,200 members throughout California, including hundreds of local public agencies and industrial operators. Many CASQA members hold industrial stormwater permits issued under state and federal law. Accordingly, on behalf of its membership, CASQA continues to be very interested in the Industrial General Permit and its implementation.

CASQA supports adoption of the Proposed Amendments. It is important that the earlier announced extension of the deadline for submittal of Permit Registration Documents under the Industrial General Permit, and for submittal of Annual Reports, be formally ratified and specifically incorporated into the Industrial General Permit itself.

CASQA also urges that the State Water Board accord the highest level of priority to any structural upgrades needed to address the outages and functional problems in the SMARTS system. We share the State Water Board's concern that these can undermine confidence in the system as well as require extra time and effort by permittees. Of course, it would be best to do whatever is possible before the August 14 deadline, since permittees are still encountering difficulties with the limited system capacity. Another deadline is approaching to submit Annual Reports under the Construction General Permit, and the SMARTS system is being used for municipal permits as well. We request that the State Water Board allocate resources in whatever way is possible to alleviate the system capacity and functional difficulties as soon as possible.

We appreciate the diligence of State Water Board staff in all aspects of the Industrial General Permit rollout, including responding to concerns and questions from the many permittees working with the new system, and to keeping open lines of communication with CASQA and others.

## CASQA Comments on Submittal Deadlines for the Industrial General Permit

CASQA looks forward to continuing communications and the State Water Board staff's openness to suggestions from CASQA members with insights on the use of the SMARTS system. If you have questions, please contact me at (650) 365-8620.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoff Brosseau". The signature is fluid and cursive, with a long horizontal stroke at the end.

Geoff Brosseau, Executive Director  
California Stormwater Quality Association

cc: CASQA Board of Directors, Executive Program Committee, and Industrial Subcommittee