



Environmental Compliance Management

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

On behalf of Environmental Compliance Management Services (ECMS) and its clients, thank you for the opportunity to provide comments regarding the renewal of the current General Permit for Storm Water Discharges Associated with Industrial Activities, Water Quality Order No. 97-03-DWQ (General Permit). We would like to commend the State Water Resources Control Board staff on its efforts in the development of the formal 2004 Draft Industrial General Permit, issued December 15, 2004. While this three year effort has been at times, exhaustive, we believe that staff is proposing a well-balanced permit that has achieved the following objectives:

- identify achievable improvements in storm water program elements;
- simplify and streamline the permit format;
- clarify the compliance obligations;
- provide sufficient flexibility to accommodate the diversity of the industrial activities covered by the General Permit;
- and adequately address EPA's Phase II requirements, as well as the concern and criticism of Regional Board staff and citizen groups about the current permit.

The following policy comments and attached Recommendations Table present our recommendations regarding the formal draft 2004 General Permit. The general policy comments offer recommendations to improve general policy interpretation and implementation. The table identifies the specific permit element of concern, the reason for the concern, and our comment or recommendation: