



SPECIAL HEARING

2/3/05

Indep

cc: BD, DI, DWQ

E-Cys: BD, CC, HMS, TH, CMW

January 25, 2005

Ms. Debbie Irvin
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Fax: 916 341-5620

RE: Support for Maintaining BMP Iterative Approach in draft General Industrial Storm Water Permit

Dear Ms. Irvin,

The Independent Oil Producers' Agency (IOPA) serves many small independent oil producers in the state of California. We support the draft General Industrial Storm Water Permit as proposed because it provides a rational, cost-effective approach for businesses such as ours to protect water bodies.

We understand, however, that some have asked for amendments requiring numeric limits for storm water discharges. Such an approach violates state and federal guidelines for storm water management, would be ineffective because of the nature of storm water and would cost small companies thousands of dollars.

Please keep me informed on future developments with this permit.

Best Regards,

Les Clark
Executive Vice President