

March 28, 2011

Jeanine Townsend Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814



Re: Comment Letter - Draft Industrial General Permit

To Whom It May Concern:

These comments have been written on behalf of Ozark Trucking Inc. in McClellan, CA in regards to the State Water Resource Control Board's (SWRCB) proposed 2011 Draft Industrial General Permit for storm water discharges. We have several concerns with the new proposal and hope that the SWRCB will take our comments into consideration as they move forward with any revisions prior to adoption.

We are currently part of the CTA Storm Water Monitoring Group. We have been part of this group since 1993. The move to our current location has shown how successful the CTA program actually is. Many companies here in the park were not properly administering their SWPPP and some had never done an NOI. The group format has created a knowledgeable and efficient program that causes the participants to exceed the quality of those in a self monitoring program. The knowledge of CTA and NES Inc. (our compliance monitoring group) has been very effective in controlling Storm Water Pollution.

The new Industrial General Permit will not improve the quality of the storm water run-off; it will only add cost to an already proven program.

CTA's monitoring group is trained annually, has site visits annually, offers professional services and constantly requires improved BMP's. This group has been a tremendous benefit to the overall quality of the storm water run-off entering our streams, rivers and lakes. To eliminate the group concept would only result in reduced effectiveness of the storm water program.

Finally, the new proposed draft would create excessive cost burden to companies like ours in an economy that makes survival difficult. Any change to the current, efficient group system would be counterproductive

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Our company takes storm water pollution prevention very seriously and has continuously strived to and succeeded in complying with all of the requirements outlined within the existing permit.

Thank you for the opportunity to comment and for considering these views as you develop the final draft of the 2011 Industrial General Permit.

Sincerely,

Ozark Trucking Inc. 4916 Dudley Blvd

McClellan, Ca 95652