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SWRCB

1001 "I" Street

Sacramento, CA 95814

Attention: J. Townsend, Clerk of the Board

Reference: Turbidity for IGP as an alternative

Gentlemen:

From the Blue Ribbon Panel Report for Storm Water on June 19, 2006, it has identified pH and turbidity to be tested in the field.

Under the Fact Sheet of the Construction General Permit (CGP) from page 15, dated September 2, 2009, a 1:3 relationship between Turbidity and suspended sediment concentration is assumed based on a review of suspended sediment and turbidity from gages used in the USGS National Water Quality Assessment Program.

It is economically for field test, save time and correction can be made immediately.

TSS has to be transported to the lab and it takes long duration for the result to be received at the site of operation if modification is required.

Please consider to allow rock, sand and gravel and among other operations to use turbidity in the field in lieu of TSS or alternative to readily solving the constituent of storm water.

Sincerely,



Peter Chiu, PE

cc: Board Members, Grey Gearheart, Leo Consentini

