

Date: July 20, 2006

To: Song Her, Clerk to the Board  
State Water Resources Control Board  
P. O. Box 100  
Sacramento, CA 95812-0100

From: John Fehringer  
CCMA Member



Re: Storm Water Draft Industrial Permit

Our company has complied with storm water permitting requirements for over thirteen years. Since then, considerable effort has been made to implement the best management practices required by the permit. The discharge from our facility may be less polluted than the discharge from many other types of facilities that do not have such extensive requirements because of their industrial classification.

Comments regarding the Storm Water Panel Recommendations to the California State Water Resources Control Board for The Feasibility of Numeric Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial, and Construction Activities are as follows:

- We agree with the statement that the current Water Board Storm Water Database cannot be used to develop numeric limits.
- We also agree with the statement that the Panel urges the Board to consider the total economic impact and not unduly penalize California industries with respect to industries outside of California.