



May 11, 2012

Shuka Rastegarpour
Environmental Scientist
Ocean Standards Unit
Division of Water Quality
California State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Water Quality Certification for
USEPA Vessel General Permits

Dear Ms. Rastegarpour,

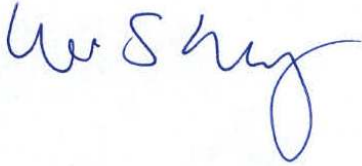
Canal Barge Company, Inc. (CBC) is a family-owned company that has been in business for over 78 years. We operate a fleet of 32 inland towboats and more than 800 barges, including coastal and offshore deck barges. We are proud to be a part of the industry that is the most environmentally friendly mode of freight transportation, and our personal commitment to the environment is illustrated by the dozens of Environmental Achievement Awards that our vessels received last year from the Chamber of Shipping of America. Thank you for the opportunity to provide comments on the California State Water Resources Control Board's 401 certification of the Environmental Protection Agency's (EPA) Vessel General Permit (VGP).

We share California's commitment to protect the waters in which we work. However, the VGP is an extremely poor fit for vessels like ours that travel through the waters of multiple states on a regular basis. This is because the 401 certification process allows states to impose multiple, and potentially conflicting, requirements in addition to the VGP's provisions. It is extremely difficult for vessel crews to change the operations of a towing vessel moving across invisible state lines while they are also focused on the safe operation of the vessel. Therefore, we urge the State Water Resources Control Board to certify the VGP without any additional conditions.

While CBC recognizes EPA's authority to issue the VGP under the Clean Water Act, the true solution is for Congress to establish a new, uniform statutory framework for the regulation of vessel discharges. This framework would provide for environmentally protective standards that keep our waters clean while being tailored to the operations of vessels in interstate commerce. Fortunately, last November, the House of Representatives passed a Coast Guard Authorization Bill with a title that would establish such a framework. We urge the State Water Resources Control Board to ask Senator Barbara Boxer and Senator Dianne Feinstein to work to advance this bill in the Senate.

Again, thank you for the opportunity to comment on the State Water Resources Control Board's 401 certification of the VGP. Please do not hesitate to let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "W S Murphy". The signature is written in a cursive style with a large, looping "y" at the end.

William S. Murphy