



Western States Petroleum Association
Credible Solutions • Responsive Service • Since 1907

Steven Arita
Senior Environmental Coordinator

November 12, 2004

Ms. Dena McCann
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Comments Regarding the SWRCB Proposed SIP revisions for November 12, 2004 Scoping Meeting.

Dear Ms. McCann,

On behalf of the Western States Petroleum Association (WSPA) we are pleased to submit the following comments regarding the State Water Resources Control Board's Proposed SIP revisions for the November 12, 2004 scoping meeting. WSPA represents the major oil and gas companies that produce, transport, refine and market petroleum and petroleum products in the six western states. WSPA members own and operate many facilities in California that are directly impacted by the SIP and therefore have a direct interest in the proposed revisions to the SIP.

As noted in the Public Hearing Notice, the SWRCB will hold a Scoping Meeting on November 12, 2004 to solicit public input on two major proposed revisions for the SIP, along with other non-regulatory language cleanup.

WSPA is very supportive of the SWRCB proposal to make the following major substantive revisions to the SIP:

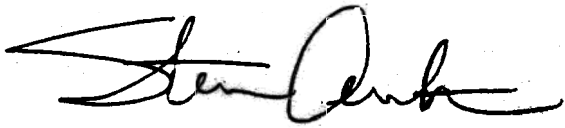
- To allow for water effects ratio (WER) to be established as part of the permit process.
To eliminate reasonable potential trigger for situations where ambient background concentrations are greater than criteria.

These two proposals will provide the dischargers and the regional boards added flexibility to make appropriate permitting decisions that are directly related to the ambient condition of the receiving water.

At this point we do not have any suggestions for the scope and content of the information needed for the FED. However, based on the comments received during the scoping meeting we may provide additional comments in the future.

Thank you for your efforts to make the SIP a more flexible, living document for dischargers and regional boards.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Arub". The signature is fluid and cursive, with a long horizontal stroke at the beginning.