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To: <commentletters@waterboards.ca.gov>  
Date: 4/27/2011 1:58 PM  
Subject: Comments to changes for Industrial General Permit

My comment concerns the following section of the permit:

SWPPP Certification Requirements (Pages 15 -16 VII)

1. Qualified SWPPP Developer:

a. The discharger shall ensure that the SWPPP is written, amended and certified by a Qualified SWPPP Developer (QSD).

b. A QSD shall have one of the following registrations for certifications, and appropriate experience, as required for:

A California registered professional civil engineer;

A California registered professional geologist or engineering geologist;

A California registered landscape architect;

A professional hydrologist registered through the American Institute of Hydrology;

2. The discharger shall ensure that the QSD successfully completes the State Water Board-sponsored or approved QSD training course within one year after the effective date of this General Permit.

a. The discharger shall ensure that the QSD signs the SWPPP and each amendment or revision.

b. The discharger shall list the name and telephone number of the currently designated QSD(s) in the SWPPP.

COMMENT: In the construction permit there are more options for certifications of a QSD. There are individuals who have considerable experience in storm water programs that are not PEs, PEs, architects, and PHs. The construction permit allows the QSD to be a Certified Professional in Storm Water Quality registered through Enviro Cert International and to be a Certified Professional in Erosion and Sediment Control. I suggest adding that to the Draft Industrial Permit.

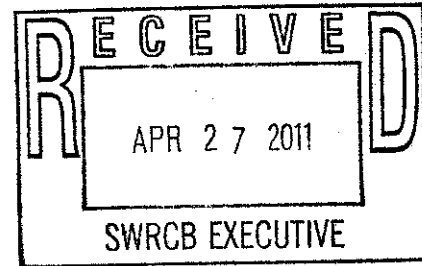
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