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Dear Ms. Townsend:

I write regarding the role specific permit requirements delegated to Qualified Industrial Stormwater Professionals (QISP) as proposed in the Draft Industrial General Permit and the qualifications and training required fulfilling these requirements. By way of background I am currently the President of a woman-owned Environmental Risk Management company (see attached biography) and one of over 1,000 Registered Environmental Managers (REM) practicing in California. As more fully described below, REMs are uniquely qualified through an exhaustive review and testing process to fulfill the obligations and requirements of QISPs and as such I believe that a REM should be accorded the same recognition as a licensed professional civil engineer, registered geologist, or certified engineering geologist and be recognized as a QISP I, II, or III without further testing or training.

The REM certification is granted by the National Registry of Environmental Professionals (NREP). NREP's mission is to professionally and legally enhancing the recognition of those individuals who possess the education, training, and experience as qualified environmental engineers, technologists, managers, technicians, and scientists into a into a single, viable source so that the public at large, the government, insurers, and employers can easily confirm the qualifications and expertise of its registrants.

RECOGNITION OF REM QUALIFICATIONS

NREP is accredited by the International Certification Accreditation Board. The REM certification is already recognized by a number of governmental agencies, including:

- Air National Guard
- Army National Guard
- Amtrak
- Department of Veteran's Affairs
- State of Alabama
- State of Arkansas
- State of Rhode Island
- State of Texas
- US Air Force
- US Department of Energy
- US Environmental Protection Agency
- US Forest Service
- US Postal Service
- National Park Service
- Resolution Trust Corporation
- US Bureau of Prisons

ROLES AND QUALIFICATIONS OF QISPs

The draft permit identifies the following Role-Specific Permit Requirements that must be performed by a QISP:

1. Preparation of SWPPPs
2. Preparation of Annual Monitoring Reports
3. Preparation of No Exposure Certifications
4. Preparation of Notice of Termination
5. Preparation of Sampling Frequency Reduction Requests
6. Preparation of Sampling Location Reduction Requests
7. Preparation of Level 1, ERA Evaluations and Reports
8. Preparation of Level 2 ERA Technical Reports
9. Preparation of Demonstration Technical Reports
10. Preparation of BMP Implementation Extension Reports

In addition to the tasks listed above, in its response to comments on the 2011 draft General Industrial Permit, state board staff listed several additional tasks that will be the responsibility of QISPs. These include:

1. Training of storm water pollution prevention team
2. Analysis of hydrologic connectivity
3. Amending and updating SWPPPs
4. Designing and implementing monitoring, sampling and testing programs
5. Consideration of 303(d) and TMDL sampling and BMP development
6. Conducting Annual Site Compliance Evaluation
7. Management of the Pollution Prevention Team
8. Quality Control of data collection

REM QUALIFICATIONS

REMs are uniquely qualified to fulfill these tasks. In order to become an REM an individual must meet the following qualifications:

Education: A Bachelor's degree or higher in an environmentally-related discipline. Recognized majors include the physical, biological and health sciences; engineering and environmental majors.

Candidates who do not meet the Education Requirements may substitute 3 years of recognized environmental management work experience for one year of education. Education waivers are subject to review and approval by the REM Certification Board, based upon a protocol established by the Certification Board.

Work Experience: Candidates must document five (5) year's work experience at a professional level, directly related to environmental engineering, health, science, or management. Examples of recognized experience follow:

1. Project Management coordination, supervision, or team member
2. Biologist, Chemist, Hydrologist, Hydrologist, Geologist
3. Environmental Field Work
4. Lab Analyst
5. Environmental Regulatory Experience
6. Environmental or Civil Engineer
7. Health and Safety Officer

8. Industrial Hygienist
9. Safety Professional
10. Permit and Application Implementation Experience
11. Environmental Technician
12. Remediation Reclamation Specialist

Verification: Candidates are required to have applications endorsed by a NREP credential holder before the application will be considered. If an NREP credential holder is not available, another qualified professional with knowledge of certification and accreditation or an officer of the candidate's corporation may validate the candidate's professional experience. The endorser attests that the candidate's assertions regarding professional experience are true to the best of their knowledge, and that the candidate is in good standing within the certification and accreditation industry.

The REM Certification Board reserves the right to verify the experience and/or education attested to by the applicant. This may be accomplished by a phone interview with the REM providing the application endorsement, or through verification of education transcripts. Additional documentation may be requested to support the application attestations.

Examination: The REM examination is comprised of 150 4-option multiple choice questions, administered in paper-pencil and computer based examinations. Candidates are allotted two hours and 45 minutes for completion of the exam. The examination content outline is based upon a Job Analysis study of the role of the REM. The examination is constructed based upon the importance rating of the six main content areas. Areas relevant to QISP competencies include:

1. Knowledge of the Clean Water Act including:
 - a. Water Quality Standards
 - b. Water Quality Criteria
 - c. NPDES storm water provisions
 - d. Effluent Limit Guidelines include BCT, BAT and WQBELS
2. Environmental Management Systems
3. Testing and Analytical Methods including:
 - a. Instrumentation
 - b. QA/QC
4. Sampling Protocols and Procedures
5. Biology including bioassays
6. Geology and Hydrology
7. Professional Practice Standards including:
 - a. Legal Obligations
 - b. Ethics

DEMAND FOR QISPs

The draft GIP removes the conditional exception for light industry. State board staff estimates that there will be in the range of 30,000 registrants under the new permit. A review of the effected SIC codes as applied to facilities in California tend to indicate that this number may be very

conservative. REMs have the demonstrated skills and training to act as Q¹s. Unlike geologists and engineers, REMs are highly qualified environmental professionals who have demonstrated their knowledge concerning water quality and environmental management through education, experience and comprehensive testing. Moreover, given the number of regulated fac²es, it is not likely that there will be enough qualified geologists and engineers available to serve the regulated community while the State Board is developing and implementing the QISP training program. This imbalance in supply and demand is likely to result in sky rocketing costs for regulated facilities, which could be ameliorated by the State Board's recognition of REMs as QISPs.

In light of the likely demand for QISPs and the proven qualifications of REMs, I request that the State Water Resources Control Board grant REMs the same status as licensed professional engineers, registered geologists and certified engineering geologist.

Thank you for your time and consideration.

Regards,
Drew

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