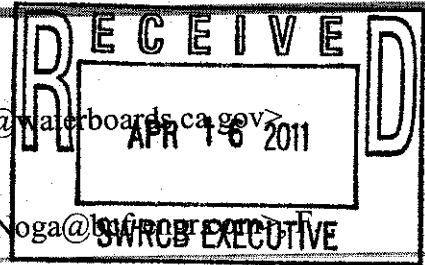


Public Comment  
Draft IGP  
Deadline: 4/29/11 by 12 noon

**commentletters - Draft Industrial General Permit**

**From:** Sean Smith <ssmith@bcf-engr.com>  
**To:** "commentletters@waterboards.ca.gov" <commentletters@waterboards.ca.gov>  
**Date:** 4/16/2011 12:29 PM  
**Subject:** Draft Industrial General Permit  
**CC:** Cordie Qualle <CQualle@bcf-engr.com>, Paige Noga <PNoga@bcf-engr.com>



Dear Jeanine Townsend,

I wanted to comment on **VII. TRAINING QUALIFICATIONS AND CERTIFICATION** of the current DRAFT Industrial General Permit (IGP) Order (shown below for reference).

## DRAFT Industrial General Permit Order

1. The discharger shall appoint a Qualified SWPPP Developer (QSD) to prepare, write, and make any revisions to the SWPPP, and appoint a Qualified SWPPP Practitioner (QSP) to help implement the SWPPP.
2. The discharger shall ensure that all QSDs and QSPs are appropriately trained in accordance with this Section. QSDs responsible for preparing and amending SWPPPs shall comply with the requirements in Section VIII.
3. In the Annual Reports, the discharger shall document all of the training that the QSDs and QSPs have received.

**B. SWPPP Certification Requirements**

## 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:
    - i. A California registered professional civil engineer;
    - ii. A California registered professional geologist or engineering geologist;
    - iii. A California registered landscape architect;
    - iv. 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.

## 3. Qualified SWPPP Practitioner:

The discharger shall ensure that the SWPPP's BMPs and monitoring requirements are implemented by a Qualified SWPPP Practitioner (QSP). The discharger shall ensure that the QSP successfully completes the State Water Board-sponsored or approved QSP training course within one year from the effective date of this General Permit.

I recently heard from SWRCB staff that the Construction General Permit (CGP) QSD and QSP Certifications may not satisfy the QSD and QSP requirements of the Industrial General Permit. The draft IGP language above does not address this issue, and I think a clarification should be included, so the QSD and QSP titles are clearly defined. I feel that the QSD title should apply to all Permits (CGP, IGP, and the upcoming SMS4 Permits). I understand and value the necessity of having SWPPP Certification Requirements for QSDs and QSPs. However, I feel that additional QSD training and testing specifically for the IGP is unnecessary. At a minimum, the current QSDs (under the CGP) should be grandfathered into the IGP QSDs (assuming they are in fact separate from CGP

QSDs). The required CGP QSD training was essentially a line-by-line recital of the CGP. Though I'm sure the thoroughness of this training boosted exam scores, I feel the burden of this 3-day training should be optional and separate from the required exam. The burden of preparation and self-education should be borne unto the QSD examinee at his/her leisure (not required for 3 days during business hours at a cost determined by the trainer). The QSD prerequisite and professional engineer's (PE) licensure holds professionals responsible for practicing engineering within their areas of technical competence.

In summary, the burden of training/education should be placed on the QSD and passing the *free* QSD examination should be the sole requirement for the universal QSD title.

Thank you,

**Sean M. Smith, PE**  
*Project Engineer*  
*Qualified SWPPP Developer (QSD)*

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