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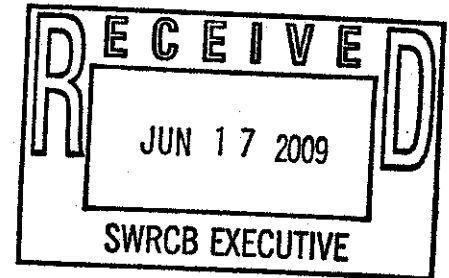
June 17, 2009

Delivered by email to: commentletters@waterboards.ca.gov

## Memorandum

To: Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

From: John Whitescarver  
Executive Director  
dba National Stormwater Center  
Center for Environmental Compliance, Inc.



Subject: Comment Letter – Draft Construction General Permit

The National Stormwater Center is a nonprofit organization organized under the IRS Regulation 501 © (3) as a company engaged in training industry and government stormwater professionals. We have more than five years experience training students to write SWPPPs in California. We have trained and examined more than 400 students over the past five years.

David Lyons (my associate) and I were on the U.S. Environmental Protection Agency (EPA) team that designed and developed the National Pollutant Discharge Elimination System (NPDES). Dave retired from the EPA after serving as a Branch Chief in the Office of Enforcement and Compliance. Dave served as the National Program Manager for NPDES Enforcement and Compliance. Recently Dave served on the California committee to develop the training program associated with the subject permit.

Both Dave and I have provided testimony at the two previous public meetings and participated in several public meetings. I support the proposed construction permit and trust the staff has consulted with the U.S. EPA so as to assure the permit is compatible with the national effluent guideline to be promulgated by December 1, 2009.

My single remaining comment is to request that the National Stormwater Center be listed in the permit along with Certified Professional in Erosion and Sediment Control organization as nonprofit entities certified by the state to teach SWPPP courses. I think it is unfair to list one and not the other. However, we recognize that our staff is qualified to instruct under the proposed Order ( SWPPP Certification Requirements) that defines the criteria including those having a minimum of five years of experience developing construction SWPPPs in California.

Thank you for your consideration.