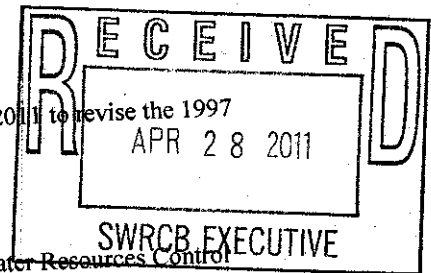


To: California State Water Resources Control Board

From: Alliance of Hazardous Materials Professionals™

Re: Comments on SWRCB's Draft Industrial General Permit dated January 28, 2011 to revise the 1997 Stormwater General Permit for Industry.

Date: April 28, 2011



The Alliance of Hazardous Materials Professionals (AHMP) thanks the State Water Resources Control Board for soliciting public comments on its Draft Industry General Permit.

The Alliance of Hazardous Materials Professionals

AHMP is the only national organization devoted to the professional advancement of the hazardous materials management field, representing over 4,000 of the nation's leading experts in environmental, health, safety and security management related to hazardous materials. Our members are both directly responsible for implementing federal and home state regulatory requirements as well as assisting the regulated community in complying with those requirements. Several key AHMP members and staff have reviewed the SWRCB's proposed modifications to the proposed General Permit for Industry and have developed comments specifically related to Training, Section VII.

The proposed draft regulations mirror the Construction General Permit by limiting the qualifications for a QSD to a Professional Civil Engineer, Registered Geologist or Engineering Geologist, Registered Landscape Architect, or Professional Hydrologist. The AHMP requests that the SWRCB include the Certified Hazardous Materials Manager as a qualified practitioner to sit for the QSD exam.

**Proposed Action: The AHMP requests that the SWRCB include the Certified Hazardous Materials Manager as a qualified practitioner to sit for the Qualified SWPPP Developer (QSD) exam.**

The Certified Hazardous Materials Manager (CHMM)

The CHMM credential is the recognized standard of excellence in the hazardous materials management community. It identifies professionals who possess superior knowledge and expertise in the management of hazardous materials as well as a commitment to technical excellence through continuing education, training and successful completion of a rigorous examination. **Each CHMM must re-certify every 5 years to maintain the credential with a minimum of 20 hours of continuing education each year as well as meeting professional development and credential recognition objectives.** Since it was established in 1984, more than 15,000 professionals have earned the CHMM credential and are active today in homeland security, environmental protection, engineering, transportation, public safety and many other critical hazardous materials management safety and security fields. The EPA Administrator, Lisa Jackson, earned her CHMM as Commissioner of the New Jersey Department of Environmental Protection.

Because of the critical role AHMP members have in our daily lives, many public and private entities recognize the expertise the CHMM credential represents and require that CHMM holders manage regulatory compliance, hazardous materials management, scientific and technical programs. The breadth of the CHMM's environmental responsibilities is diverse and contributes greatly to the safety and security of every man, woman and child in the United States every day.

CHMMs work in critical areas such as clean up and disposal of hazardous materials (57 percent), emergency planning and response (49 percent), environmental impact (24 percent), environmental compliance (66 percent), hazardous waste management (67 percent), waste minimization and pollution prevention (48 percent), water pollution control (28 percent) and many other interrelated fields.

Over 80 percent of AHMP members work in the following areas: Private industry (25%), Federal, State and Local Government (18%), Consulting (23%) and College/University (5%). We have members who serve as

environmental managers of major manufacturing facilities that have chemicals on site to responders who are first to the scene of an incident. It is safe to say that many industrial and consulting members handle stormwater pollution prevention and are on the front lines of innovative BMPs for stormwater management. We are unique in that way from any other organization in the EHS&S industry.

Our members are distributed across more than 50 chapters in 37 states plus the District of Columbia. In 2006, AHMP established its first international chapter in Bangalore, India.

Specific Comments on the Training Requirements for the Qualified SWPPP Developer (Section VII).

A large concern for the Industrial General Permit is the management of hazardous materials that come in contact with stormwater. The CHMM is uniquely knowledgeable in the management of these hazardous materials to promote safety and prevent pollution. It is safe to say that the majority of industrial facilities and their operations are on paved or otherwise impermeable surfaces. The concern for erosion control is minimized and the engineering/geology/landscaping/hydrology practices are minimized, compared to the Construction General Permit. It is for these reasons that the AHMP strongly feels that the SWRCB would be well served by including in the pre-qualified list, those uniquely qualified to manage hazardous materials, the professional CHMM.

Specific Comments on the Training Requirements for the Qualified SWPPP Practitioner (Section VII).

The draft Industrial General Permit does not specify the pre-requisites for the QSP, but AHMP urges restraint when requiring pre-requisites for this training for general industry, where so many businesses are small and run by industrious persons who lack formal education.

AHMP envisions a world where the natural environment is unburdened by pollution; workers are exposed only to healthy and safe conditions; and hazardous materials are used and transported safely and efficiently. As it has for more than two decades, AHMP works to advance the field of hazardous materials management to make its vision a reality. Its core purpose is to foster a community of professionals and to jointly advocate for the public recognition of the value of the CHMM credential and other EHS&S credentials. AHMP is headquartered at the Federation of American Societies for Experimental Biology (FASEB) campus in Bethesda, MD., just outside Washington, D.C.

Thank you for the opportunity to comment on this important Stormwater Industrial General Permit.

Sincerely,

Cedric Calhoun, FASAE, CAE, Executive Director of the Alliance of Hazardous Materials Professionals  
AHMP Government Affairs Committee  
Robin Spencer, CHMM, REA, Chair  
Carol Hall, CHMM, REA, Member