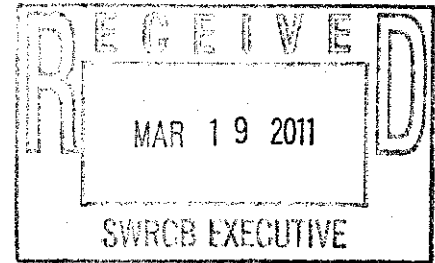


March 19, 2011

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Clerk of the Board
State Water Resources Control Board
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Comment Letter – Draft Industrial General Permit

The Board should consider opening-up the certification program to allow those of us that have been working with industrial clients and the preparation of the SWPPP program since it's inception.

The engineering aspects should be certified by qualified engineers and geologist.

Industrial facilities are far more complicated than construction sites or highway construction. If the current training program is to be used for training SWPPP preparer's to certify industrial client's, the focus should be on various sources of chemical constituents. i.e. heavy metals, pH, volatile organics – organics in general.

The preparation field should be opened to Registered Environmental Assessor's with industrial experience of 10 years or more. A recognized four year degree in Environmental Management and a significant background with working with a wide variety of industrial facilities all of which can be verified much the same as the verification procedures for the Construction Qualifications as QSD/QSP.

The Department of Toxic Substances Control allows consultants and facility owners to develop hazardous waste on-site treatment systems and

requires professional engineers to certify those portions of the system that require engineering expertise.

The Board should consider allowing the same operations and conditions for the development and operation of the Storm Water Permit Program. A training program and testing is a good idea to ensure a quality program with quality people to meet the discharge requirements of the state's General Permit Conditions.

Respectfully,

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