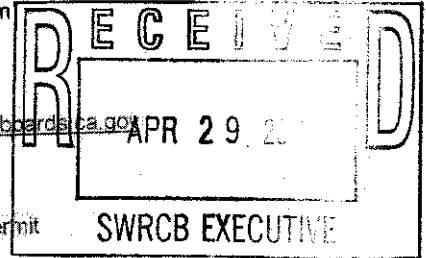


Mark Baumgardner Management Consulting LLC
1900 Indian Hills Trail Akron, Ohio 44313-8013
T: (330) 864-5560 e-mail: mbmcehs@roadrunner.com
April 29, 2011

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, Sacramento, CA 95814

submitted by e-mail:
commentletters@waterboards.ca.gov



Re: Comment Letter - Draft Industrial General Permit

Dear Ms. Townsend:

I wish to respectfully submit comments on the above captioned draft Industrial General Permit for the state of California.

I do so, as there are a number of companies, headquartered in other states such as Ohio, that have operations or do business in California. These businesses and operations will be required to secure an Industrial General Stormwater Permit. As an Environmental, Health and Safety consultant working out of Ohio, I am called upon to help prepare and sometimes conduct inspections required by the Industrial General Permit.

I am specifically requesting that the California Water Resource Control Board **include the Certified Hazardous Materials Manager "CHMM" as a qualified practitioner to sit for the Qualified SWPPP Developer (QSD) exam.**

I am requesting that because those who are Certified Hazardous Materials Managers or CHMM's have an interdisciplinary understanding of the management of hazardous materials. Preventing pollution in stormwater not only requires an understanding of how these hazardous materials can be discharged directly to stormwater but also thorough indirect means, such as air emissions; management of solid and hazardous waste; waste minimization; transportation of hazardous materials and substitution of less toxic materials. A CHMM has at least 7 years of experience in the management of hazardous materials, must pass an exam offered by the Institute of Hazardous Materials Management and must be recertified every 5 years via a formula that requires continuing education and active practice in the hazardous materials field.

Because this credential is recognized nationwide and worldwide, it would allow professional like myself to sit for the Qualified SWPPP Developer (QSD) exam without having multiple professional registrations in multiple states. It would still assure that competent persons are preparing stormwater management plans for the people of California.

I appreciate the opportunity to comment on the draft Industrial General Permit and trust the Board will allow CHMM's to sit for the QSD exam.

Sincerely yours

A handwritten signature in cursive script that reads "Mark T. Baumgardner".

Mark T. Baumgardner, CHMM
Principal
Mark Baumgardner Management Consulting LLC