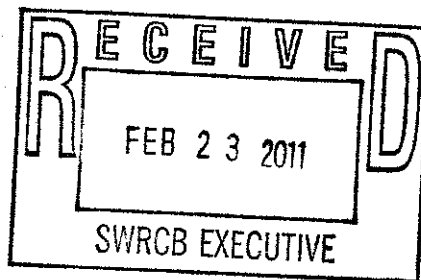


17 February 2011

Michael L. Thayer, CHMM
18355 West 35th Street South
Sand Springs, OK 74063

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



RE: Comment Letter – Draft Industrial General Permit

Ms. Townsend:

Page 16 of the *Draft Industrial General Permit Order*, which is dated January 28, 2011, states:

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;
 - iii. A California registered landscape architect;
 - iv. A professional hydrologist registered through the American Institute of Hydrology

As the developers of the California permit are aware, the Federal permit does not require personnel who write and amend SWPPPs to have a specific professional registration. The EPA provides extensive guidance on the elements required for an effective SWPPP. I believe that this existing guidance and the maturity of the NPDES program is sufficient without the need for requiring additional professional registration which will increase costs to the regulated community.

If California is determined to require some level of professional registration or certification, I would strongly urge you to consider the addition of a few of the well-respected environmental credentials to your *SWPPP Certification Requirements*.

The Certified Hazardous Materials Manager (CHMM) is issued by the Institute of Hazardous Materials Management and is accredited by the American National Standards Institute and the Council of Engineering and Scientific Specialty Boards (CESB). The Qualified Environmental Professional (QEP) is issued by the Institute of Professional Environmental Practice and is accredited by the CESB. Obtaining either of these well-respected credentials requires a minimum level of education, practical work experience, and passing of a written examination. Both also require minimum levels of continuing professional and educational development in order to maintain certification as well as adherence to codes of ethics.

I have attached some information relevant to both the CHMM and QEP credentials. Further information for each is also available at the following websites:

Institute of Hazardous Materials Managers: www.ihmm.org

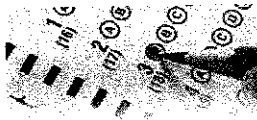
Institute of Professional Environmental Practice: www.ipep.org

Thank you for consideration of my comments.

Sincerely,



Michael L. Thayer, CHMM



General Information

Professional certifications boost your career, validate your achievement, and recognize your commitment to public safety and the environment. The Institute of Hazardous Materials Management (IHMM) offers the hazmat industry's premier accredited professional credentials—the Certified Hazardous Materials Manager (CHMM®) and the Certified Hazardous Materials Practitioner (CHMP™)—credentials that recognize your expertise and open up new possibilities for you to make a significant impact on public health and safety, the environment, your community, and your country.

Applicants

- [General Information](#)
- [Eligibility Requirements - CHMM](#)
- [Eligibility Requirements - CHMP](#)
- [Eligibility Requirements - HMMT](#)
- [Examination Information](#)
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- [Apply Online](#)
- [FAQs - General/Applicants](#)

Understanding the certification process is the first step in achieving your credential

Apply for a credential online and submit supporting documentation. Complete and submit your application online. You may submit your supporting documentation before or after your complete your application. After an initial review, IHMM will contact you regarding of any missing documents. Upon being found eligible to take the examination, you will receive an approval email on how to register through our testing interface.

Register to take the examination. After receiving the approval email, you may register and pay for the examination online. You may register anytime during your 18 months of eligibility. After completing registration, you will receive an email that will explain what materials you may bring or may not bring to the examination. **Note: You do not contact testing centers directly. All registrations are done through our testing interface after you are found eligible to take the examination.**

IHMM Upcoming Events
There are no upcoming events currently scheduled.
[View full calendar](#)
IHMM Monthly Calendar

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|---------------|----|----|----|----|----|----|
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| 6 | 7 | 8 | 9 | 10 | 11 | 12 |
| 13 | 14 | 15 | 16 | 17 | 18 | 19 |
| 20 | 21 | 22 | 23 | 24 | 25 | 26 |
| 27 | 28 | | | | | |

Complete the examination. All examinations are held through the proctored Kryterion HOST® network, at over 450 computer-testing locations world-wide. The examinations are offered at anytime, however, most testing centers will likely be closed for holidays and each testing center has its own hours of operation and seating availability. Results will be delivered via email the day after your examination.

Pay an annual maintenance fee. After passing the examination, you must pay your first year fee and submit your Code of Ethics. Upon receipts of those items, IHMM will authorize use of your credential. Every credential holder must pay their annual maintenance fee by their anniversary date each year to remain in good standing.

Maintaining your credential. IHMM requires recertification every five (5) years to ensure that certificants retain their currency with the advancements in technology and changes in compliance requirements that occur frequently in hazardous materials management and related fields.

What are the benefits of being certified?

- I. Recognition from peers, public, and employer.
- II. Satisfaction of achievement.
- III. Career development, growth, and advancement.
- IV. Confidence in doing your job.
- V. Assurance on quality of work.
- VI. Reduced liability.
- VII. Belonging to a select community.

- VIII. Recognition of commitment to public safety and the environment.
- IX. Identifies distinguished individuals.

If you deal with hazardous or potentially hazardous materials in any capacity, you should be certified! Corporations, universities and government agencies depend on these credentials to identify hazardous materials professionals like you.

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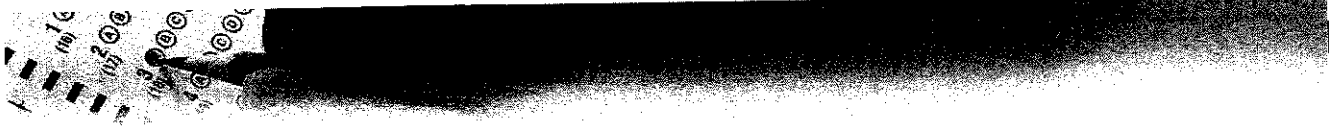
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Eligibility Requirements - CHMM

IHMM's accredited CHMM credential recognizes your expertise and opens new possibilities for you to make a significant impact on your community and your country. Corporations, universities and government agencies depend on the CHMM certification to identify hazardous materials professionals like you. By earning the CHMM credential, you join together with a community of over 15,000 of your peers who have demonstrated their personal commitment to professional excellence, and protecting the environment and the public's health and safety.

Applicants

- [General Information](#)
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PREREQUISITES

All candidates must meet two prerequisites to sit for the CHMM examination:

1. Baccalaureate degree (or higher) from an accredited college or university in hazardous materials management, environmental science, one of the physical sciences, or a related field.
2. Minimum of three years of relevant experience in the field of hazardous materials management or a related field.

All applications require a non-refundable \$125 application fee, detailed work history or resume, official, original college transcript, and two reference evaluations. Applications to take IHMM examinations expire 18 months from the date your application is received. You must submit all supporting documentation, register for and complete the examination within that time, or you will have to start over as a new candidate, and meet whatever requirements are in effect at that time.

Please view or download the [CHMM Candidate Handbook-Feb 2009.pdf](#) for additional information.

IHMM Upcoming Events

There are no upcoming events currently scheduled.

[View full calendar](#)

IHMM Monthly Calendar

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College Transcript Requirements

An official transcript must be on file at the IHMM Executive Office before you can register for an examination. Official transcripts must have the registrar's original stamp or seal (not a photocopy) showing your achievement of a degree from the accredited college or university in the United States which conferred your degree. To find out whether a college in the U.S. is accredited, check with the Council for Higher Education Accreditation (CHEA).

Degrees acquired through foreign colleges or universities are acceptable if they are documented as equivalent to an AAS or BS/BA degree issued in the United States. Candidates with degrees from colleges and universities outside the U.S. must provide a statement of equivalency from a recognized evaluating agency. For a list of recognized agencies, see www.naces.org/members.htm. See our [FAQ's](#) section for more information. If the applicant holds an additional degree in a relevant field from an accredited U.S. college or university, only the U.S. college transcript needs to be submitted, and a degree equivalency report will not be required.

Relevant Experience Requirements

Relevant experience includes, but is not limited to, the following examples:

1. Hazardous materials identification and handling in compliance with applicable laws and regulations.

2. Planning and preparing for and responding to hazmat emergencies and incidents.
3. Sampling and analysis (of air, water, soil, waste) for potential contaminants.
4. Site investigation and remediation.
5. Hazmat program or project management.

Questions regarding the application or examination process? Please contact us at examinfo@ihmm.org

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IPEP CODE OF ENVIRONMENTAL ETHICS

The purpose of the Code of Ethics is to state the principles of ethical conduct expected of members of the Institute of Professional Environmental Practice (IPEP).

IPEP members are expected to conduct their affairs in a manner that protects human health and welfare and the environment, and that is befitting of the profession and respectful of fellow members.

IPEP members shall act at all times with fairness, courtesy and good faith to their associates, employers, employees and clients, and with fidelity to public needs. They shall uphold the values of truth, honesty and trustworthiness. In keeping with these basic tenets, IPEP members shall:

- Hold paramount protection of human health and the natural environment
- Comply with applicable statutes, regulations, and standards
- Undertake and accept responsibility for professional assignments only when qualified by training and/or experience
- Provide a professional opinion on a subject only when it is founded upon adequate knowledge derived from good science, thoughtful deliberation, and honest conviction
- Act as a faithful agent of clients and/or employers, maintain confidentiality and avoid conflict of interest but, where such conflict or potential for conflict arises, fully and expeditiously disclose the circumstances to the employer, client, and/or community
- Avoid practicing the profession while under the influence of thought-impaired substance
- Maintain professional competence through continuing professional development activities, endeavor to advance the body of knowledge in one's practice area, and provide opportunities for the professional development of associates
- Act with fairness; courtesy and good faith towards client, colleagues and others; give credit where it is due; and accept/give constructive, honest, and fair professional comment
- Communicate clearly, to the employer, client, and/or community, the potential consequences if professional decisions or judgments are overruled or disregarded
- Exercise honesty, objectivity and diligence in the performance of professional duties and responsibilities

www.ipep.org

RAISING PROFESSIONAL STANDARDS SINCE 1993

IPEP Participating Organizations

A&WMA

Air & Waste Management Association
www.awma.org

AEEE

American Academy of Environmental Engineers
www.aeee.net

AIHA

American Industrial Hygiene Association
www.aiha.org

ICAC

Institute of Clean Air Companies
www.icac.com

NAEM

National Association for Environmental Management
www.naem.org

SWANA

Solid Waste Association of North America
www.swana.org

WEF

Water Environment Federation
www.wef.org

IPEP History

The QEP certification program evolved from visionary members of the Air & Waste Management Association (A&WMA) who saw the need for a broad-based environmental credential. In the spring of 1992,

A&WMA's Certification Steering Committee conducted an international survey of A&WMA members. The results indicated overwhelming support among environmental professionals for a general, multi-disciplinary, multi-media environmental credential.

The motivation for such a credential was to establish a program of certification that would allow those who use the services of environmental professionals to select competent and experienced individuals with a commitment to a Code of Environmental Ethics.

The Certification Steering Committee proposed, and the A&WMA board approved, the formation of an independent, not-for-profit certifying body to be called the Institute of Professional Environmental Practice (IPEP). IPEP was formed in 1993 to develop and administer the certification program.

The Institute of Professional Environmental Practice (IPEP) is the independent, not-for-profit certifying body for the Qualified Environmental Professional (QEP) and the Environmental Professional Intern (EPI) certifications.

IPEP's mission is to improve the practice and educational standards of environmental professionals. IPEP is governed by a volunteer board of highly respected environmental professionals representing leading professional environmental membership associations.

IPEP IS AN ACCREDITED MEMBER OF
www.cesb.org

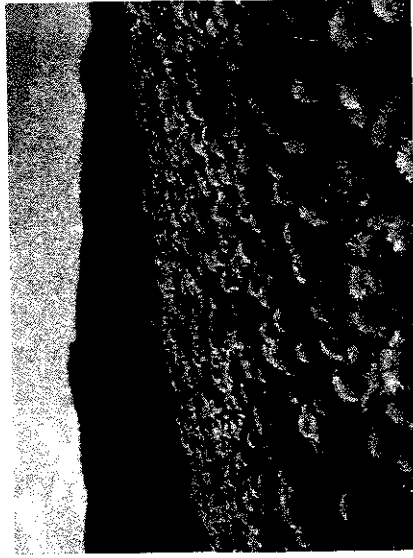


Institute of Professional Environmental Practice

PREMIERE ENVIRONMENTAL CREDENTIALS

QEP CERTIFICATION

Qualified Environmental Professional (QEP) certification is for environmental professionals that have been in the field for at least five years and uphold the highest of ethical and professional standards.



International

Multi-disciplinary

Standard Body of Knowledge

Multi-media

Standard of Ethical Practice

www.ipep.org

RAISING PROFESSIONAL STANDARDS SINCE 1993

BENEFITS of QEP Certification

SHOWCASE YOUR LEVEL OF KNOWLEDGE & SKILL

IPEP's credentials require rigorous application and examination processes that ensure successful candidates have both a broad and deep understanding of the environment and environmental issues. The QEP is the premiere credential for environmental professionals.

BRING FOCUS TO YOUR COMMITMENT

Attainment of the QEP shows a strong commitment to excellence in applied environmental science, adherence to a strict code of ethics, and commitment to professional excellence with contribution to profession and community.

INCREASE YOUR MARKETABILITY

Today, more than ever, you need to stay one step ahead of the competition. The complexities of preventing and managing air, land, and water pollution require environmental professionals to have knowledge in more than one discipline or one area of specialized training. In addition, professionals working in the field must be aware of the range of technical, health and safety, regulatory, and policy aspects of any situation.

NETWORKING

QEP credential holders belong to a group of highly skilled environmental professionals. A roster of QEPs, published annually by IPEP, increases the visibility of this elite group among peers and other professional contacts. IPEP also conducts an annual business meeting and reception during A&WMA's Annual Conference and Exhibition to provide additional forums for technical exchange and professional networking. In addition, IPEP Members receive a quarterly newsletter, have access to our group on LinkedIn®, can participate in our Mentor program and may post resumes on our Career Center free of charge.

RECOGNITIONS

Participating Organizations - AAEE, AIHA, A&WMA, ICAC, NAEM, SWANA, and WEF.

CEESB - The Council of Engineering and Scientific Specialty Boards (CESB), an independent, third party accreditation body, has granted full accreditation to the QEP.

US Air Force - The United States Air Force has recognized the QEP as a 'Group A' certification in its highest Professional Development Pillar of the Civil Engineer Career Field Professional Credentials Program, indicating that it satisfies 100% of the Air Force's Professional Registration/Certification requirements for that program.

US EPA - In March, 1998, the EPA's Office of Acquisition Management (OAM) reviewed the QEP and "indicated that the QEP certification serves to distinguish a highly competent and accomplished individual in the environmental field. Therefore, to the extent that a program office recommends inclusion of a QEP certification for individual solicitation action, OAM contracting personnel will include the requirement in the evaluation criteria."

APPLICATION

A candidate is required to complete an IPEP application, documenting education and work history. A candidate's application must be reviewed by IPEP's Admissions Committee in order to be approved into the examination process.

Application packets can be downloaded online at www.ipep.org, or you may contact our office to receive one by mail or fax.

EXAMINATION

WHEN AND WHERE YOU CAN TAKE THE EXAM

IPEP's examinations are administered in numerous locations in Canada, the United States, and limited locations throughout the world. IPEP has a network of QEP Regional Coordinators who schedule the exam with each applicant and proctor individually, coordinating a convenient time and place for both individuals.

DESCRIPTION

The exam is international in scope and contains no regulations, but focuses on technical environmental science.

The oral exam is designed to be a 90-minute interview. During this time, the candidate will be given 20 minutes to present and discuss an abstract, which will have been submitted with the application.

The written exam is a two-part, six hour, multiple choice exam. All candidates take a General Environmental Science Exam (Part I). For Part II, each candidate must choose one of four Practice Areas in which to be examined further: Air Quality, Water Quality, Waste Management, or Environmental Science, Management & Policy.

MINIMUM REQUIREMENTS FOR THE ORAL EXAM

- Baccalaureate degree
- At least 15 years of subsequent professional environmental experience acceptable to IPEP
- Demonstration of at least 10 qualifying years in a position of responsible charge
- At least one of the 3 required references being supplied by a QEP

MINIMUM REQUIREMENTS FOR THE WRITTEN EXAM

- Baccalaureate or equivalent degree in physical, earth or natural science, engineering, or mathematics
- 5 subsequent years of professional environmental work experience, or 8 subsequent years of professional environmental work experience with a baccalaureate degree in a discipline other than those listed above.

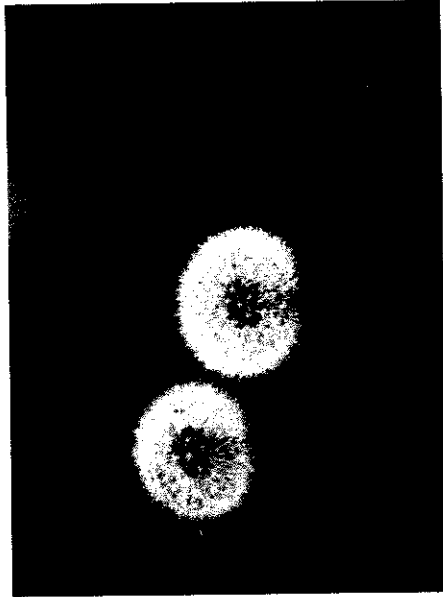
COURSES & STUDY GUIDES

IPEP publishes a complimentary Body of Knowledge, which provides valuable information on the written exam along with sample exam questions and a recommended reading list.

Our Participating Organizations also offer courses and additional study materials. See our website for links or contact our office for more information.

MAINTAINING CERTIFICATION

- Adhere to IPEP's code of ethics
- Pay annual renewal fees
- Complete recertification documentation every five years (While there is no fee for recertification, the process requires evidence of continuing professional development through education and participation in professional activities)



TOP TEN COMPANIES EMPLOYING QEPs (Fall 2008)

- 1 - ENSR, 2 - Tetra Tech EM Inc., 3 - USEPA, 4 - 3M, 5 & 6 (tie) - URS Corporation and USNAVY, 7 - Camp Dresser & McKee Inc., 8, 9 & 10 (tied) - Alcoa, Inc., Saudi Aramco and TRC Environmental Corp.

IPEP's volunteer Board of Trustees and Committee Members work on issues related to maintaining high standards of practice in today's professional environmental arena, overseeing the applications and approvals of applicants, and ensuring the relevance and accuracy of the exams.

Institute of Professional Environmental Practice

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