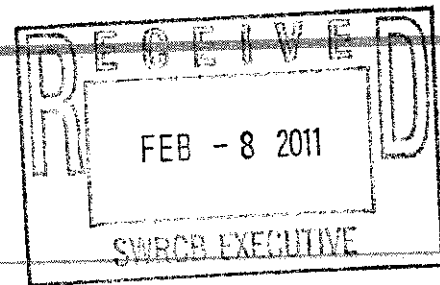


commentletters - Draft Industrial SWPPP

From: Keith Hamblin <jehkah@shasta.com>
To: <commentletters@waterboards.ca.gov>
Date: Tuesday, February 08, 2011 2:09 PM
Subject: Draft Industrial SWPPP



Dear Board:

I have read your draft order, fact sheet, etc. My comment is related to who are listed as "Qualified SWPPP Developers" (QSD) on page 16 of the order. There are only 5 registered professional categories listed that can prepare industrial SWPPPs (civil engineers, geologist, engineering geologist, landscape architect, and hydrologist). The order has left out other professionals that should be permitted to prepare these plans. Two additional professionals that should be added are Certified Professional in Erosion and Sediment Control (CPESC) and Certified Professional in Storm Water Quality (CPSWQ). Both of these groups can prepare Construction SWPPPs in California. I must say that both professionals are more qualified to prepare SWPPPs than the registered geologist and landscape architect categories that are listed in the draft order.

This same issue of who could be a QSD was brought up during the hearing process for the adoption of the new general construction permit in 2009. The general construction permit allows both CPESCs and CPSWQs to prepare SWPPPs. Please keep in mind that the industrial permit includes a wide variety of industrial activities such as mines in which ground disturbance are a major concern. I am a CPESC and I have worked on a wide variety of projects that required SWPPPs. These SWPPPs were for both construction and industrial sites. My training has prepared me to prepare plans in both fields of work.

As a side note, I have passed all the requirements to be a Qualified SWPPP Developer for construction SWPPPs in California.

Should you have any questions, feel free to contact me.

Keith Hamblin