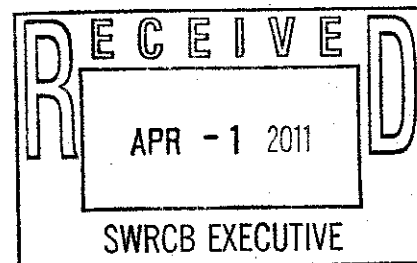


Amy Comte
CALTROP Corporation
1775 Hancock Street, Suite 190
San Diego, CA 92110

March 21, 2011

Jeanine Townsend
Clerk to the Board
State Water Resource Control Board
1001 "I" Street, 24th Floor
Sacramento, Ca 95814



Re: Draft Industrial General Permit, Section VII. Training Qualifications and Certifications

While I agree that having a specific training and experience is critical to improving compliance and consistency within the industrial storm water program, I disagree with the certification requirements necessary to be a Qualified SWPPP Developer (QSD).

The proposed section within the draft permit requires very specific professional registrations that are exclusive. The professional registrations sited require a specific educational background that excludes many storm water professionals with years of experience drafting and amending industrial SWPPP's. Without specific education, these certifications are not easily obtained.

I suggest an alternative approval process that recognizes the individual that possesses a level of competency and experience to draft, amend and certify industrial SWPPPs. This approach is comparative to the Construction General Permit recognizing the Certified Professional in Erosion and Sediment Control (CPESC) and the Certified Professional in Storm Water Quality (CPSWQ) to be QSDs. The CPESC and CPSWQ, through an approval and testing process, certify a level of expertise in erosion and sediment processes and related storm water knowledge.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Comte".

Amy Comte
619-990-5705