

To: California State Water Resources Control Board
c/o Leo Consentini lcosentini@waterboards.ca.gov

From: Michael E. Hall, President Northern California Chapter of the Alliance of Hazardous Materials Professionals NCC-AHMP

Re: Comments on SWRCB's Draft Industrial General Permit dated January 28, 2011 to revise the 1997 Stormwater General Permit for Industry.

Date: April 29, 2011

The Northern California Chapter of the Alliance of Hazardous Materials Professionals (NCC-AHMP) thanks the State Water Resources Control Board for soliciting public comments on its Draft Industry General Permit.

The Northern California Chapter of the Alliance of Hazardous Materials Professionals

The NCC-AHMP has over 150 members and represents Certified Hazardous Materials Managers in Northern California (from about Fresno north to the Oregon border). Many of our members work in industry or consulting and are directly responsible for stormwater pollution prevention, SWPPP development and management.

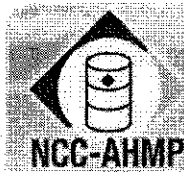
AHMP is the only national organization devoted to the professional advancement of the hazardous materials management field, representing over 4,000 of the nation's leading experts in environmental, health, safety and security management related to hazardous materials. Our professional certification is the Certified Hazardous Materials Manager (CHMM). In California, we have over 260 CHMMs that work in industry, state or local government, consulting, or the military. Our members are both directly responsible for implementing federal and home state regulatory requirements as well as assisting the regulated community in complying with those requirements. Our Regulatory Liaison has reviewed the SWRCB's proposed modifications to the proposed General Permit for Industry and in consultation with other members, has developed comments specifically related to Training, Section VII.

The Certified Hazardous Materials Manager

The CHMM credential is the recognized standard of excellence in the hazardous materials management community. It identifies professionals who possess superior knowledge and expertise in the management of hazardous materials as well as a commitment to technical excellence through continuing education, training and successful completion of a rigorous examination.

Many public and private entities recognize the expertise the CHMM credential represents and require that CHMM holders manage regulatory compliance, hazardous materials management, scientific and technical programs.

A large concern for the Industrial General Permit is the management of hazardous materials that come in contact with stormwater. The CHMM is uniquely knowledgeable in the management of these hazardous materials to promote safety and prevent pollution. It is safe to say that the majority of industrial facilities and their operations are on paved or otherwise impermeable surfaces. The concern for erosion control is minimized and the engineering/geology/landscaping/hydrology practices are minimized, compared to the Construction General Permit. It is for these reasons that the NCC-AHMP strongly feels that the SWRCB would be well served by including in the pre-qualified list, those uniquely qualified to manage hazardous materials, the professional Certified Hazardous Materials Manager.



NORTHERN CALIFORNIA CHAPTER
Alliance of Hazardous Materials Professionals (formerly ACHMM)

Specific Comments on the Training Requirements for the Qualified SWPPP Developer (Section VII).

The proposed draft regulations appears to take the Construction General Permit pre-requisites for training by limiting the pre-qualifications for a QSD to a Professional Civil Engineer, Registered Geologist or Engineering Geologist, Registered Landscape Architect, or Professional Hydrologist. We feel that the SWRCB and this General Permit for Industry will be well-served by including the Certified Hazardous Materials Manager as a qualified professional to sit for the QSD exam.

Thank you for the opportunity to comment on this important Stormwater Industrial General Permit.

Sincerely,

Michael Hall, President, NCC-AHMP