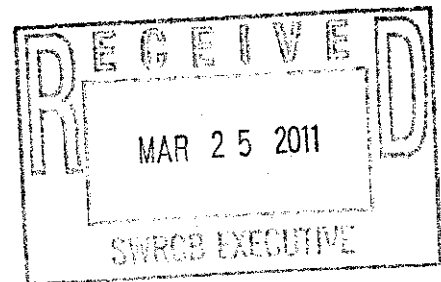


LaRoc Environmental

March 25, 2011

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



SUBJECT: Comment Letter – Draft Industrial General Permit

Dear Ms. Townsend:

The comments below on the Draft Industrial General Permit (IGP) dated January 28, 2011 are provided for Board and Board staff consideration.

Section VII.B – SWPPP Certification Requirements

The draft IGP requires that a Qualified SWPPP Developer (QSD) prepare and sign the SWPPP, and each amendment or revision. The IGP QSD would be required to have one of the following registrations:

- California registered professional civil engineer;
- California registered professional geologist or engineering geologist;
- California registered landscape architect;
- Professional hydrologist registered through the American Institute of Hydrology;

We agree that appropriate certification or registration, and experience should be required for IGP QSDs that will be developing and signing IGP SWPPPs. We believe that the State Board's initial list of qualifying professionals is too limited and will result in severe delays in adequate implementation of the new requirements across the State. The four registrations currently listed in the draft IGP excludes a large group of environmental and compliance experts, and professionals that have been providing services and SWPPP to industrial permittees for more than fifteen years.

The State Board should consider other existing registrations and certifications that will provide additional resources to the expanding industrial community anticipated to be permitted under the new IGP. The following additional certifications are recommended in the next version of the IGP:

- California Water Environment Association (CWEA) Compliance Inspector Grades III and IV;
- California Water Environment Association (CWEA) Laboratory Analyst Grades III and IV;
- Certified Professional in Storm Water Quality (CPSWQ)TM through EnviroCert International; and
- Certified Professional in Erosion and Sediment Control (CPESC)TM through EnviroCert International.

We believe that adding these additional certifications will greatly expand the resources available to the regulated community and permittees, and provide a more diverse pool of professionals available to

Ms. Townsend
Comment Letter – Industrial General Permit
March 25, 2011

prepare and implement the IGP SWPPPs and requirements. Specifically, the CWEA Compliance Inspector certification adds the resources of professionals that have been permitting and inspecting industrial facilities for many years, and that bring a wealth of industrial operations and water quality experience.

I appreciate your consideration of these comments and recommendations for IGP QSDs.

Sincerely,



Rosanna M. Lacarra
Owner
LaRoc Environmental

C: California Storm Water Quality Association