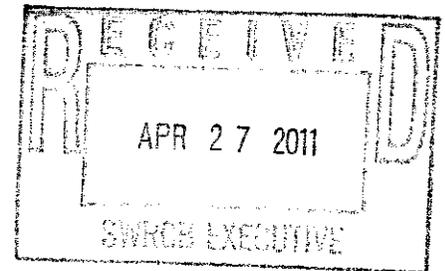


GRIFFIN ENVIRONMENTAL

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April 24, 2011

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street,
Sacramento, CA 95814



Re: Comment Letter – Draft Industrial General Permit

This is in regard to Part VII (Training Qualifications and Certification) of the Draft Industrial General Permit for Stormwater discharges.

Our first concern is for the SWPPP Certification Requirements for the Qualified SWPPP Developer – (QSD) under Section B.1.b. of that draft permit for industrial discharges.

In its existing draft form the QSD registration is highly restrictive by being limited to California licensed civil engineers, with no allowance for other engineering disciplines with specific experience in analyzing storm water, its discharges, pollutant loads, sources, amelioration or removal processes for storm water.

Examples of such engineering disciplines which have the potential to provide equal or superior registration and experience - directly pertaining to storm water discharges - include licensed chemical engineers, industrial engineers, mechanical engineers and petroleum engineers.

Secondly, the QSD limitation in Section B.1.b. [to only licensed civil engineers] also may unnecessarily limit the ability of qualified minority individuals to analyze, prepare, and write SWPPPs under this Draft permit.

We note that civil engineering projects relating to storm water “fixed works” or constructed projects such as diversion structures, impoundments, etc. are rightly to be performed by licensed civil engineers, as noted under Part I, Section G of the draft permit. We believe that such structures must be performed under the responsible charge of licensed civil engineers.

We urge the State Board to change the registration requirement of Section B.1.b. to include those engineering branches with perhaps more direct engineering experience and practice - such as licensed chemical or mechanical engineers – for the QSD qualification.

If you have any questions, please contact us at the above address, or by phone at (949) 857-0455 or by e-mail at: enviro46@dslextreme.com.

Sincerely,

Roger D. Griffin, M.S., P.E.
Principal