

From: "Laurie Demers" <ldemers@stormwaterusa.com>  
To: <commentletters@waterboards.ca.gov>  
CC: "Laurie Demers" <ldemers@stormwaterusa.com>  
Date: 6/24/2009 3:28 PM  
Subject: Comment Letter - Draft Construction General Permit Education 1.

Public Comment  
Dft. Construction Gen. Permit  
Deadline: 6/24/09 by 5:00 p.m.

Page 32 VII.B.1 and VII.B.4

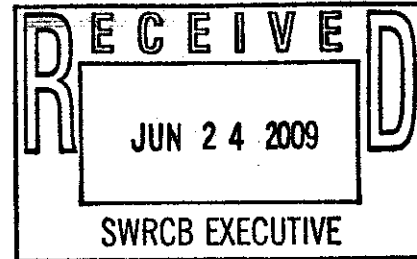
Jeanine Townsend, Clerk to the Board

State Water Resources Control Board

1001 I Street, 24th Floor

Sacramento, CA 95814

This letter is in concern over two sections of the Draft construction General Permit for California.



1. Page 32 VII.B.1 - Qualified SWPPP Developer
2. Page 32 VII.B.4 - Qualified SWPPP Practitioner

We believe this section is in violation of California Anti Trust laws in that it restrains education providers to just a few organizations, and disallows other legitimate, credible, accepted, education providers and therefore stands to create a monopoly on education providers.

We ask that the language in the current version (previous to the Draft) of the CA General permit remain; or simply we ask to be included as education providers for Inspectors and SWPPP preparers; or that the CA EPA adopt a written standard for education that serves to encourage competition in the educational arena.

Currently Stormwater USA has 410 California Students in our Certified Compliance Inspector f Stormwater (CCISR) class and Certified Preparer of SWPPP (CPSWPPPR) class. We have over 2000 students nationally enrolled in our classes. 98% of our students would recommend our class to others.

Stormwater USA has a complete and proven product line that would be absolutely perfect for your program. Our classes are available now and could save Californians considerable amounts time, money and energy immediately. Our program is a complete solution - keeping the student as our customer in mind at all times. We have created a "program in the box" for our students. We provide our students with education, refresher access to their education, exams and the best part - all of the paperwork that they would ever need to put together a compliant SWPPP or construction site, all accessible in one place, in an environmentally sustainable online format.

Stormwater USA, LLC asks to be included as an acceptable online education provider for SPWPPP preparers and Stormwater Inspectors by the state. Our program exceeds all written California and Federal requirements for education providers for Stormwater Compliance. In addition, our program would provide the following additional benefits to the citizens of California who will be required to participate in Stormwater Compliance Education as follows:

About Stormwater USA, LLC

1. Female Majority Owned Company
  2. Proven: Stormwater USA, LLC has been providing online classes for two years.
  3. 47 years combined national experience in Erosion and Sediment Control education by partners and authors of class.
  4. Primary Author Shirley D. Morrow, CPESC, CISEC. IECA Faculty profile: <http://www.ieca.org/eupdateimages/shirleymorrow.pdf>
  5. Secondary Author, Editor, Managing Director - Laurie Demers, Civil Engineer: 13 years Stormwater Compliance Education and National Program Manager
  6. Sustainable Platform: Online 24/7 - students have access to class at any time and for two years after completion of program. No need for expensive and polluting travel.
  7. Stormwater USA library - Includes all federal and state's information (including California) General Permits, NOIs, NOTs as well as all relevant paperwork to be in compliance with California General Permit requirements.
  8. Auditing: Government agencies and clients have the ability to audit the classes at any time for quality and accuracy.
  9. Certification: Students print out their certification upon completion of their training modules and exams
  10. Tech Support: Aggressive customer service and tech support.
  11. Memberships: US green Build Council; Canadian Green Build Council; IECA
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1. CPSWPPPR Certified Preparer of SWPPP:
    - a. Level 300 Education Approved Class US Green Building Council <http://www.greenbuild365.org/coursedetail.aspx?ID=90000238>
    - b. 230 current California CPSWPPPR California Students
    - c. 520 National CPSWPPPR students
    - d. 8 hour certification class
    - e. Students have access to all class content and library for 2 years after certification completed.
    - f. Each student receives a unique exam pulled randomly from a pool of questions.
    - g. CPSWPPPR certification Includes CCISR certification
    - h. Well received: 98% of our CCIS students would recommend this class to others. Full survey information available upon request.
  2. CCISR - Certified Compliance Inspector of Stormwater:
    - a. Level 300 Education Approved Class US Green Building Council <http://www.greenbuild365.org/coursedetail.aspx?ID=90000303>
    - b. EPA reviewed and recognized: Specified education for 3 US EPA and US Department of Justice Consent Orders

- c. 180 current California CPSWPPPR California Students
- d. 1675 National CPSWPPPR students
- e. 6 hour certification class
- f. Students have access to all class content and library for 2 years after certification completed.
- g. Each student receives a unique exam pulled randomly from a pool of questions.
- h. Well received: 98% of our CCIS students would recommend this class to others. Full survey information available upon request.

Stormwater USA also provides the following classes:

1. Basics of Erosion and Sediment Control for Subcontractors Online - English and Spanish
2. Basics of Erosion and Sediment Control for Subcontractors Multiuse DVD - English and Spanish, includes exams, sign in sheets, certificate of completion templates
3. Erosion and Sediment Control Short Course for Urban Construction - GGHACA - Toronto Canada on our sister site [www.esconline.ca](http://www.esconline.ca)

I would be very happy to provide you with sample classes for your complete review.

For more information visit us at [www.StormwaterUSA.com](http://www.StormwaterUSA.com)

Thank you in advance for your consideration.

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USGBC Education Provider