Public Comment
Industrial General Permit
Deadline: 10/22/12 by 12 noon

RECEIVED
9-30-12
SWRCB Clerk

Limitation of the QISP training exemption to Civil Engineers makes no sense. Industrial stormwater discharge, especially with quantitative limits, requires knowledge about industrial processes and activities and their use of chemicals, oils, etc. It is fine to specify Civils for construction stormwater purposes, as those are mainly about erosion control and sediment. Civils, in general, are perhaps the least trained of all engineers regarding industry. Civils, in general, will be poor at identifying potential sources of contaminants from an industrial facility relative to the typical Chemical or Mechanical Engineer.

Training of various engineering disciplines has overlap. Expertise of all engineers and geologists is more related to their work experience than their college degree and broadly defined field of registration. Some Civils are specifically trained in Environmental Engineering, but most are not. There are some Civils with appropriate expertise to be a QISP III. However, the majority of them do not have such expertise. The same can likely be said for geologists and engineering geologists.

I see two modes of correction for the draft permit revision:

1. perhaps the easiest is to delete the training exemption completely. Revise #47, second sentence, to "To qualify as a QISP, each individual must complete a State Water Board sponsored or approved training course." This assures that everyone preparing plans has been exposed to the training, providing some assurance of consistency and specific familiarity with the requirements.
2. The other option is to apply the training exemption to all CA PEs. Revise #47, second sentence simply by deleting the word "civil". As currently drafted you rely on the civils, the geos, and the engg geos to self-select, assuming those who choose to do this work will be competent in the appropriate required skills and knowledge. This option 2 simply extends that courtesy to all CA registered PEs. This recognizes overlap between disciplines, and expertise based upon education, training, licensing, and experience rather than simply based upon a college degree and licensing. As with civils, geos and engg geos, this revision extends a professional courtesy or recognition to all PEs they self-regulate and work within their own expertise.

Your choice, but choose one of the options, as they are both better than what is currently drafted. Thank you for making this important change.

I am a registered chemical engineer with over 30 years of experience in pollution prevention. I have worked on stormwater issues and have prepared stormwater plans for industrial clients since the inception of SWPPP requirements. It would be absurd for me to not be included in a class of engineers who are exempted from the QISP training requirements.

Peter M. Hendricks, P.E.
Osprey Environmental Consulting
www.OspreyEC.com
phendricks@ospreyec.com
925-465-6048 office
925-465-6159 fax
925-899-5132 cell