

From: Chris Ehrler <cehrler@tenera.com>
To: <commentletters@waterboards.ca.gov>
Date: 4/28/2011 1:35 PM
Subject: comments on the Industrial General Permit

Hi Jeanine,

Thanks for the opportunity to send in comments about the draft NPDES General Permit for Storm Water Discharges Associated with Industrial Activities. I bet there are a few others that have sent in or will send in comments.

I believe the proposed changes will indeed assist in decreasing the quantity of pollutants that enter the states waters.

I have been working with a number of small to medium sized school districts over the last seven years and assisting them with their NPDES storm water compliance. Many of these school district fall under the industrial permit because they have a few buses and a fueling facility at their transportation facility. My main concern is the need for their SWPPP to be written by QSD who has to be a state certified engineer, geologist, landscape architect, or professional hydrologist. In the construction general permit there is allowance for a QSD to be certified by EnviroCert International, yet in the draft industrial permit this allowance is not available. It appears to me that someone who qualifies as a Certified Professional in Storm Water Quality (CPSWQ) would be able to write a SWPPP and help with compliance as well or better than some of the register professionals that are listed.

It is unclear in the draft if the QSP would need to be on site at all times or if that person would be able to verify that the BMPs and monitoring requirements are implemented correctly. I suggest a possible rewrite to make it clearer.

Thanks for a better definition of a qualifying storm event.

If pH and TSS are to be determined in the field using a calibrated portable instrument (Section X.E) why does Table 4 (page 34) specify TSS test methods that need to be completed in a state certified lab?

Thanks again for reviewing my comments.

Chris

Chris Ehrler

Tenera Environmental

141 Suburban Road, Suite A2

San Luis Obispo, CA 93402

phone: 805-541-0310

email: cehrler@tenera.com

