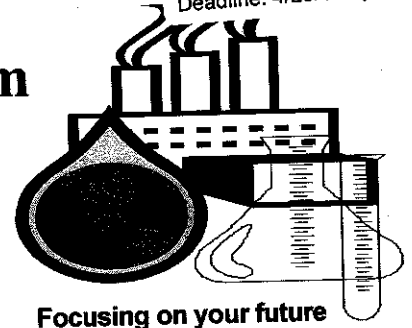


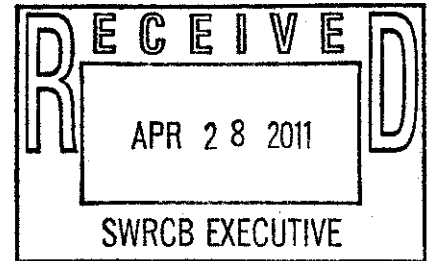
Bordner Environmental & Safety Team

Greg Bordner, PE, CSP, REA, CPP, CHMM
Phone: 909-257-8141
greg@bordnerenvironmentalandsafety.com



Greg Bordner
10841 Ring Avenue
Alta Loma, CA 91737
April 28, 2011

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



Subject: Comment Letter – Draft Industrial General Permit

After having reviewed the DRAFT STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR THE DISCHARGE OF STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES (INDUSTRIAL GENERAL PERMIT), I have the following comments:

The permit specifies that a Qualified SWPPP Developer (QSD) be either:

- i. California registered professional civil engineer;
- ii. A California registered professional geologist or engineering geologist;
- iii. A California registered landscape architect;
- iv. A professional hydrologist registered through the American Institute of Hydrology

The registered professional engineer requirement should extend to other engineering disciplines, including Chemical and Mechanical Engineers. These other engineering disciplines are equally qualified to prepare, review and certify storm water plans. Professional Engineers in these other disciplines also have to conform to their respective engineering discipline's Code of Ethics and Professional Conduct which states that they will provide professional services only in the area of competence.

There is no justification to restrict preparation and certification requirements to a single engineering discipline while at the same time allowing registered non-engineering professional disciplines this opportunity. The fact that the State and Regional Water Boards are developing QSD and Qualified SWPPP Practitioner (QSP) training programs which will include an exam to demonstrate competency further supports the argument that there is no need to restrict the requirement to a single engineering discipline.

Sincerely,

Greg Bordner