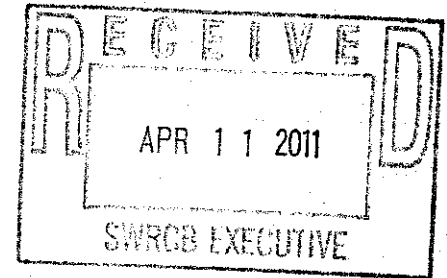


commentletters - Comment Letter - Draft Industrial General Permit

From: Tina Sentner <t.sentner@yahoo.com>
To: <commentletters@waterboards.ca.gov>
Date: Monday, April 11, 2011 10:47 AM
Subject: Comment Letter - Draft Industrial General Permit

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor



RE: Comment Letter – Draft Industrial General Permit

Dear Ms. Townsend;

In response to the State Water Board request for comments regarding all aspects of the draft Industrial General Permit, I am submitting my comments.

I am a woman owned small business providing consulting services to industries regulated by the State Water Resources Board General Industrial Permit. My business has provided over 15 years of consulting services to developing Storm Water Pollution Prevention Plans for various clients. The new draft permit implements a new requirement for individuals who develop SWPPPs to be a Qualified SWPPP Developer (QSD) with competency minimum of having an engineering degree. This narrow requirement will not only eliminate those small businesses who have been working in this area cost effectively but it also overlooks those companies that may have significant storm water experience in California with developing storm water plans. This new regulation will effectively eliminate my small business from continuing to help industry be able to comply with storm water regulations and therefore eliminate my existing and potential business in an already difficult economic climate. I believe the minimum training requirements are necessary, however I would encourage the State Board to consider expanding the competency requirements to include more flexible competency standards such as scientific degrees and years of experience to address small business needs who have significant experience with storm water compliance issues and developing storm water pollution plans.

I appreciate the Board considering my comments for their further review.

Sincerely,
Tina Sentner

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