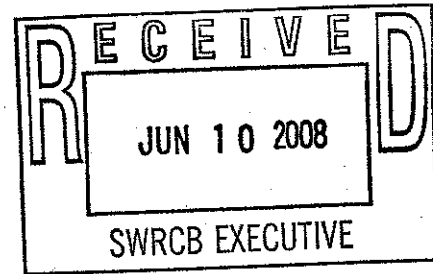




June 10, 2008



Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Comments on Draft Construction Permit

We have completed an assessment of the proposed construction permit and have the following comments:

- Our registrants, Certified Inspector of Sediment and Erosion Control (CISEC) are ready to immediately conduct construction sites inspections as specified in the draft permit.
- While current regulatory emphasis is on EPA rules and regulations, the CISEC program is developing new modules to address California rules and regulations.
- We request that the following be added to the acronym list:

CISEC Certified Inspector of Sediment and Erosion Control

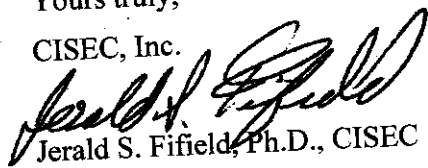
- We recommend that regulations be adopted requiring the following from all professional certification organizations whose registrants are SWPPP Practitioners
 - Each year, registrants demonstrate an accountability of their activities to the professional certification organization,
 - Every three years, all professional certification organizations demonstrate an accountability of their SWPPP Practitioner program to the State Water Board, and
 - After each accountability review, the State Water Board publicly identifies those professional certification organizations whose registrants can continue being SWPPP Practitioners for the next three years.

Lastly, CISEC, Inc. conducts the equivalent of SWPPP Practitioner classes throughout the nation and would welcome an opportunity to develop similar training sessions for the State Water Board. Additional information on our program can be found in the attached brochure.

Thank you for the opportunity to submit this information.

Yours truly,

CISEC, Inc.


Jerald S. Fifield, Ph.D., CISEC
President

JSF/jf

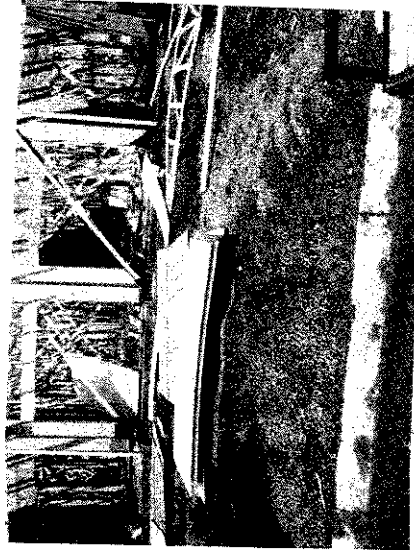
Attachment

CISEC, Inc. administers a nationwide certification program that recognizes the abilities, skills, experience, and knowledge of inspectors who have demonstrated their proficiency in observing, inspecting, and reporting on the implementation of Storm Water Pollution Prevention Plans (SWPPPs).

Mission Statement

To provide an inspector certification program for individuals that:

- Demonstrate comprehensive knowledge in the principles and practices of sediment and erosion control and their applicability to development of discharge permit documents.
- Demonstrate the necessary skills to observe onsite and offsite conditions that impact the quality of storm water discharges from active construction sites.



- Demonstrate the ability to inspect installed best management practices and their ongoing maintenance to determine if the mitigation measures will minimize the discharge of sediment and other pollutants from active construction sites.
- Demonstrate the ability to communicate and report on their inspection of active construction sites as to whether compliance issues may exist with federal, state and/or local discharge permit regulations.



Training Modules

Attendance in the training modules is not required before taking the comprehensive certification examination.

Day 1 (8:30 a.m. to 4:30 p.m.)

Module 1: EPA Information

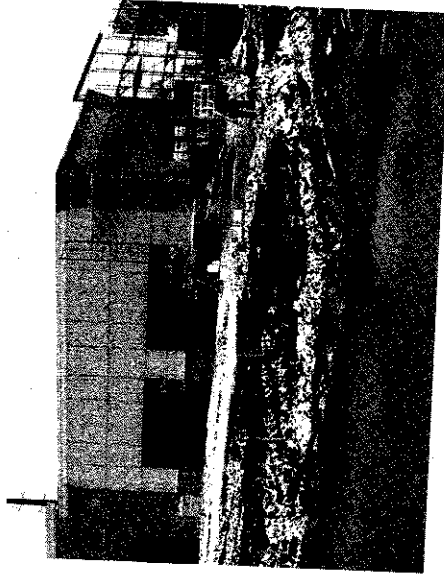
- Clean Water Act
- NPDES General Permit
- Evaluating the CGP
- Understanding a SWPPP and the S&EC Drawings

Module 2: Best Management Practices

- Understanding the Phases of Construction
 - Inspecting
 - Barriers
 - Check structures
 - Drains and inlets
 - Sediment Containment Systems
 - Other temporary sediment control measures
 - Erosion control practices
 - Hazardous waste material sites
- Writing Inspection Reports
- Assessing Inspection Reports

Module 3: Background of an Inspector

- Definitions
 - Erosion
 - Sediment
 - Sedimentation
- Why Hydrology is Important
 - Hydrographs and sedigraphs
 - Watersheds and discharge points
- Using BMPs on Construction Sites
 - Large Land Development
 - Vertical
 - Big Box
 - Linear



Day 2 (8:30 a.m. to 11:00 a.m.)

Module 4: Duties of an Inspector

- Inspection Requirements
 - Role of Designers, Inspectors, and Contractors
- Inspector Responsibilities During Construction Activities
 - Inspection Reports
 - Reporting on BMP Maintenance
 - Documentation
 - Communication
 - Working with Contractors.
- Inspecting Construction Sites for a Client

Certification Examination

Day 2 (1:00 p.m. to 4:30 p.m.)

During the three-hour examination, applicants deemed qualified by CISEC, Inc. will demonstrate their inspection skills by answering questions on:

- EPA rules and regulations as they apply to understanding, implementing, and updating SWPPPs and S&EC plans.
- Understanding requirements of the CGP.
- BMP inspection requirements.
- Assessing construction sites for compliance.
- Analyzing a SWPPP and the S&EC drawings.
- Identifying noncompliance conditions.
- Writing inspection reports.



The cost for attending 1½ days of training modules is \$250.

If you want to sit for the ½-day certification examination, CISEC, Inc. must review and approve your qualifications. Download material from www.cisecinc.org and submit your application, references, payment form, and \$130 processing fee to CISEC, Inc. by no later than 30 days before the examination date.



CISEC Training Modules and Certification Examination

at

CISEC, Inc.

P.O. Box 188
Parker, CO 80134
Phone: 720-235-2783
Fax: 303-841-6386
cisec_inc@yahoo.com
www.cisecinc.org

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