



State Water Resources Control Board

June 13, 2025

EnviroCert International, Inc.

Robert W. Anderson, Professional Civil Engineer, Juris Doctorate, CPESC, CPSWQ, CPMSM, CPISM, CPSWQ, QSM, QSP/QSD & ToR, QISP/Compliance Group Leader & ToR
President & CEO

Melissa McKinney, QSM, CNED
Chief Operation Officer, Director of NGICP, Director, Board of Directors

Michael Chase, CPESC, CESSWI, CPMSM, CPISM, QSP/QSD & ToR, QISP/Compliance Group Leader & ToR
Vice President

Dear Mr. Anderson, Ms. McKinney, and Mr. Chase:

Thank you for the suggestions regarding the 2022 National Pollutant Discharge Elimination System Construction General Permit (2022 CGP) Qualified Stormwater Pollution Prevention Plan Developer (QSD) and Qualified Stormwater Pollution Prevention Plan Practitioner (QSP) Training Program prerequisite criteria and review process. State Water Resources Control Board (State Water Board) staff recognizes EnviroCert International, Inc.'s concerns expressed in the letter dated October 7, 2024, and in follow-up discussions. After consulting Regional Water Quality Control Board staff and legal counsel, State Water Board staff reached the following conclusions:

1. Although in-field experience can be valuable for preparing prospective QSD/QSPs to effectively comply with permit requirements, it is not an explicit written requirement within the 2022 CGP. Staff cannot impose in-field experience that is not required by the 2022 CGP itself. The State Water Board may consider incorporating an in-field experience requirement during the permit reissuance after additional information gathering and consideration.
2. Staff agree a formal exam based on job-task analysis is a valid way to assess prospective QSD/QSPs' knowledge of stormwater management. However, that

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

level of exam may be more appropriate for final certification programs rather than for individual training courses. The intent of allowing consideration and approval of additional QSD/QSP prerequisites was to provide a variety of avenues for individuals to learn the fundamental skills associated with stormwater management necessary to implement and inspect best management practices. The 2022 CGP's "courses" are training programs, not certification programs such as those offered by EnviroCert International, Inc. The State Water Board may consider incorporating a formal exam requirement, based on job-task analysis during the permit reissuance.

3. The 2022 CGP allows the State Water Board to suspend or rescind QSD/QSP certifications for negligent, fraudulent, or incompetent individuals. State Water Board staff encourage dischargers and other stormwater professionals to submit complaints regarding QSD/QSPs that are not implementing stormwater management practices per the permit requirements. If State Water Board staff find that the changes to the QSD/QSP prerequisites could address issues with QSD/QSP performance, staff will explore revisions during the permit reissuance.

As long-standing administrators of permit-adopted QSD/QSP prerequisites, staff values EnviroCert International, Inc.'s perspective on the state of the QSD/QSP Training Program and looks forward to collaborating with you as we move forward with the permit reissuance process in 2026.

Sincerely,



Nicholas Martorano, Assistant Deputy Director
Division of Water Quality