



State Water Resources Control Board

December 31, 2024

EnviroCert International, Inc.

3054 Fite Circle, Suite 108
Sacramento, CA 95827

Attention: Michael Chase, Vice President
Melissa McKinney, Chief Operation Officer
Robert W. Anderson, President & CEO

Dear Mr. Chase, Mrs. McKinney, and Mr. Anderson,

The State Water Resources Control Board (State Water Board) received the letter from EnviroCert International, Inc. (EnviroCert) expressing concerns about changes to the Qualified SWPPP Developer (QSD) and Qualified SWPPP Practitioner (QSP) Training Program. The State Water Board values feedback on the QSD/QSP Training Program and staff is reviewing the concerns expressed in the letter regarding implementing the 2022 Construction Stormwater General Permit. This letter sets out additional background and information related to your concerns. Additionally, staff is available if you would like to arrange a meeting to discuss your concerns in greater detail.

One of the primary concerns in EnviroCert's letter was regarding whether alternative prerequisite courses approved by the Division of Water Quality Deputy Director should have any express experience requirements. With the adoption of the 2009 Construction Stormwater General Permit (2009 CGP), the State Water Board created the California QSD and QSP certifications to ensure consistent development and implementation of Stormwater Pollution Prevention Plans to comply with the permit requirements. The 2009 CGP established several underlying prerequisite options for the QSD and QSP certification, ensuring individuals pursuing certification have fundamental knowledge of construction stormwater management. However, since the adoption of the 2009 CGP, only two QSD prerequisites and two QSP prerequisites remained accessible to non-licensed professionals, all of which relied on experience requirements.

The State Water Board adopted the 2022 CGP with a provision (Section V.H.) allowing the Division of Water Quality Deputy Director to approve additional underlying

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

prerequisites, with the intent of addressing the regulated community's concerns about insufficient numbers of QSDs and QSPs to comply with the new permit requirements.

In January 2024, State Water Board staff, with the CGP Training Team's guidance, made recommended criteria for the consideration of approving or denying proposed prerequisite programs available on the State Water Board website. In alignment with the State Water Board's intent to increase the accessibility of the QSD and QSP certifications, the criteria did not include express experience requirements for individuals enrolling in the proposed underlying prerequisites. However, staff does understand the concern with this approach and the potential for unexperienced QSDs and QSPs to have the primary role of protecting water quality at active construction sites. Accordingly, State Water Board staff is gathering additional information on how express experience requirements may limit the candidate pool and will consider revising the recommended criteria and prerequisite review process to include an experience requirement.

Additionally, as noted in your letter, the 2022 CGP no longer requires stormwater professionals to retain their underlying prerequisites to maintain their QSD and QSP certifications, as they have already demonstrated the fundamental knowledge in construction stormwater management necessary to obtain the certification. Instead, QSDs and QSPs are now required to complete six hours of continuing education annually to maintain good standing. Stormwater professionals may, but are not required to, utilize continuing education options offered through their underlying prerequisite to satisfy this requirement. This change to the QSD/QSP Training Program was intentional, removing a financial barrier and making the certifications more equitable for stormwater professionals, while still satisfying the intent of requiring ongoing stormwater education. A change to the 2022 CGP to require stormwater professionals to retain their underlying prerequisite would require an amendment to the permit. State Water Board staff are not proposing any amendments to the permit at this time.

EnviroCert also expressed concerns that California Stormwater Quality Association (CASQA) committee members are not required to provide conflict of interest statements. The State Water Board established a Memorandum of Agreement with CASQA to administer the QSD/QSP Training Program with both parties serving as co-chairs on the CGP Training Team. The CGP Training Team is a group of regulators, stormwater professionals, and construction industry representatives that serve to advise both the State Water Board and CASQA on the QSD/QSP Training Program. The CGP Training Team is not a CASQA subcommittee and therefore does not require its participants to be members of CASQA. The State Water Board and CASQA are aware that some CGP Training Team participants may have possible conflicts of interest and will consider requiring participants to submit a conflict-of-interest disclosure form.

Staff is available to meet with EnviroCert International, Inc. and would like to engage in further discussions regarding the implementation of the QSD/QSP Training Program. Please coordinate with Brandon Roosenboom (brandon.roosenboom@waterboards.ca.gov) to arrange a future meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Crader". The signature is fluid and cursive, with the first letter "P" being large and prominent.

Phillip Crader, Deputy Director
Division of Water Quality

CC: Joaquin Esquivel, Board Chair
Eric Oppenheimer, Executive Director