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**Chambers, Laura M.**INDEPENDENT REGULATORY  
REVIEW COMMISSION

**From:** Weaver, Mike [mike.weaver@depaulgroup.com]  
**Sent:** Monday, November 30, 2009 10:06 AM  
**To:** EP, RegComments  
**Subject:** Revisions to E&S Control & Stormwater Management

The revisions do not address procedures for renewing NPDES permits. Many residential projects have NPDES permits that will expire prior to their completion due to the housing slump. Most of these projects have all the infrastructure in place with exception to the wearing course on the roads. A consistent renewal process should be established. It would seem reasonable and in the best interest of water quality to review the existing BMP's at the site and if they are well established and functioning correctly to simply extend the permit. This could be accomplished by a site inspection and review of any current violation notices by the local conservation district. A fee to accomplish this could be established.

I have been told by one conservation district that when they get an application for renewal, they will review it utilizing any new guidelines and regulations which may require new testing, modifications and/or new BMP's. If a site is functioning well, why would you require additional work which will require new earth disturbance and the potential for sediment pollution. If the site's BMP's are established and preventing sediment pollution, it seems intelligent to leave them alone.

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