

Xiao Chi Jie (The X CJ Corp dba Mila)

Section S3B5, Employee Training: The SWPPP shall include BMPs to provide SWPPP training for all employees and contractors/vendors who have duties in areas of industrial activities subject to this permit. Contractors/vendors may be excluded if the permittee has an employee who has been trained on the SWPPP supervising the activity at all times.

MiLa Comment: It is not feasible to provide a trained employee to monitor all activities of contractors/vendors while on site nor is it feasible to train each individual while on site. For instance, the MiLa site receives numerous trucks for delivery and pickup. Each driver cannot be managed by an individual, trained MiLa employee. This burden to either monitor or train would be constant and MiLa has no control over the drivers companies send. Different drivers arrive hourly and the loading docks are part of the grounds in which this draft permit extends. Due to this vagueness on defined contractor/vendor, it is assumed that this also refers to delivery load and pickup activities. What is more reasonable, is that contractor/vendor performing "construction type activities" in or around the areas controlled by this permit, to undergo stormwater training as this activity could be adequately monitored and controlled. However, having a new FedEx driver be monitored continuously on the grounds while performing their duties or trained prior to their duties is not a reasonable requirement.