Western Washington Phase II Municipal Permit Stormwater Management Training Plan Template

2024-2029 Permit



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## Introduction

The Washington Stormwater Center used Thurston County’s *Stormwater Training Plan* as a template for Western Washington Phase II permit holders. The purpose of this template is to assist Phase II municipalities meet the training requirements in the Western Washington Phase II Municipal Stormwater Permit (Permit). This training template should be customized to your specific organization and reflect the work groups and job titles performing the work. Jurisdictions should periodically review the plan and update it to reflect changes in the permit, regulations, advancements in stormwater management, and the evolution of policies, procedures, and practices. [Appendix 1](#_bookmark30) of this training plan contains the specific 2024-2029 Permit conditions that require training for staff who have direct or indirect job duties that fall into the following stormwater program areas:

1. Illicit Discharge Detection and Elimination (IDDE)
2. Controlling Runoff from New Development, Redevelopment, and Construction Sites
3. Operations and Maintenance (O&M)
4. Source Control
5. Code Enforcement
6. Tracking and Record Keeping

For each of these program areas, the *Stormwater Training Plan Template* describes the groups or positions resources for curricula, delivery options, and frequency. Jurisdictions should fill in each section with references to their specific codes and ordinances, Stormwater Management Program Plan (SWMPP), site specific Stormwater Pollution Prevention Plans (SWPPPs), Engineering and Design Standards, and any other policies and procedures related to this stormwater permit compliance. Refresher training occurs as needed to address changes in procedures, techniques, requirements, or staffing. The responsibility lies with the jurisdiction to document that their staff receives the applicable training.

Thurston County prepared a [Permit Implementation Tracking Tool](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.wastormwatercenter.org%2Fwp-content%2Fuploads%2FSPITT_2024-2029_template.xlsx&wdOrigin=BROWSELINK) which is located on the Washington Stormwater Center Website which may be of use in tracking all permit deliverables.

## Illicit Discharge Detection and Elimination (IDDE)

The IDDE training fulfills Permit Special Conditions S5.C.5.d.iii and S5.C.5.f. [The Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual](https://www.ezview.wa.gov/Portals/_1962/Documents/SAM/2020_ICID_Manual.pdf#:~:text=This%20Illicit%20Connection%20and%20Illicit%20Discharge%20Field%20Screening%20and%20Source) is an excellent tool to design the program and associated training obligations. This permit training requirement applies to staff who have a specific duty to look for, investigate, respond to reports of and eliminate illicit discharges and connections. This training must include the following types of job classifications:

* + Field staff
	+ Code Compliance Officers, Sheriff Deputies, environmental technicians
	+ IDDE Investigators

### Field Staﬀ

Field staff who, as part of their normal job responsibilities, might encounter or otherwise observe a spill, illicit discharge, and/or illicit connection to the Jurisdiction’s municipal separate stormwater sewer system (MS4) receive training on:

1) identifying spills, illicit discharges, and illicit connections; and

2) proper procedures for reporting and responding to these incidents following the Organization’s *Spill Reporting Plan and Matrix*.

### Code Enforcement / Sheriff Deputies

Code Compliance and Deputy Officers receive training on identifying spills and the proper procedures for reporting them. This category of employee contains those who have a specific job obligation to look for violations of municipal or county code.

### IDDE Investigators

Staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges (including spills and illicit connections) receive additional training to conduct these activities. This includes training on the use of the [*Illicit Connection and Illicit*](https://www.wastormwatercenter.org/wp-content/uploads/2020_ICID_Manual_final_20200507-1.pdf)[*Discharge Field Screening and Source Tracing Guidance Manual*](https://www.wastormwatercenter.org/wp-content/uploads/2020_ICID_Manual_final_20200507-1.pdf)(*ID-IC Manual*). Staff responsible for assessing stormwater outfalls receive training on how to map, trace, and characterize illicit discharges and connections.

Items to include:

* Asset management software if used by jurisdiction
* GIS Mapping software if used
* List / pictures of aquatic resources
* Health and safety risks in the various streams, lakes, rivers including special water designations such as TMDLs, additional water quality criteria of concern.

*Table 1. IDDE/Spills Program Area Training*

| **Audience** | **Curriculum Description** | **Training Delivery** | **Training Frequency** |
| --- | --- | --- | --- |
| Field staff | IDDE program overview, including information on how to identify and report suspected spills, illicitdischarges, and illicit connections | * Online IDDE & Spill Response Training or [Washington Stormwater Center’s online videos](https://www.wastormwatercenter.org/permit-assistance/municipal/permit-assistance-2/ic-id/)
 | * Within six months of hire
* Online IDDE & Spill Response Refresher every two years
 |
| Deputies | Spill identification and reporting procedures per jurisdictional procedure | * Online Spill Response for Sheriff Deputies or code enforcement training
 | * Within six months of hire
* Refresher training as needed to address changes in procedures
 |
| IDDE Investigators | Source tracing, investigation, termination, and cleanup of spills, illicit discharges, and illicit connections | * Online IDDE & Spill Response Training
* [*IC-ID Field Screening*](https://www.wastormwatercenter.org/wp-content/uploads/2020_ICID_Manual_final_20200507-1.pdf)[*& Source Tracing*](https://www.wastormwatercenter.org/wp-content/uploads/2020_ICID_Manual_final_20200507-1.pdf)[*Guidance Manual*](https://www.wastormwatercenter.org/wp-content/uploads/2020_ICID_Manual_final_20200507-1.pdf)and related training
* Read MS4 Permit Special Condition S4.F, and General Condition G3
* HAZWOPER 40-hour
 | * Within six months of hire
* Online IDDE & Spill Response Refresher every two years
* 8-hour annual HAZWOPER
 |

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## Runoﬀ Control: New Development/Redevelopment/Construction Sites

Training for controlling stormwater runoff from new development, redevelopment, and construction stormwater fulfills Permit Special Condition S5.C.6.e. Table 3.1 lists training related to S5.C.6.c.iv. duties. This training is for staff teams that perform:

* Permit issuance for land development, redevelopment, construction, road projects and other activities that require permits from the jurisdiction.
* Plan review and design of Public Works construction and maintenance projects
* Construction site oversight and inspections
* Building inspections & maintenance

### Permit Development Center Staﬀ

Staff responsible for reviewing low impact development (LID) code applicability and stormwater-related documents to identify potential conflicts with other codes (e.g., steep slopes, wetlands, critical areas, and shorelines). A review of local guidelines, ordinance, and the [Ecology LID webpage](https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/stormwater-permittee-guidance-resources/low-impact-development-guidance).

* 1. ***Stormwater Plan Reviewers and Project Designers for Capital and Maintenance Projects*** Stormwater plan reviewers and designers for public works construction and maintenance projects receive training to conduct these activities. Training should include site plan and report review per local guidelines, project review flowcharts, public works construction and maintenance projects coordination procedures, Certified Erosion and Sediment Control Lead (CESCL) certification, and best management practice (BMP) selection/design.

### Construction Site Inspectors and Road Operations Crew Chiefs

Construction Inspectors and Road Operations Crew Chiefs must receive training on temporary erosion and sediment control (TESC) and construction stormwater pollution prevention per local guidelines and related recordkeeping. They must also maintain CESCL certification. See [WSDOT’s Highway Runoff Manual (HRM)](https://emailwsu.sharepoint.com/%3Ab%3A/r/teams/wsc.municipalpermitgroup/Shared%20Documents/General/Permit%20Training%20Requirement/WSDOT%20Highway%20Runoff%20Manual.pdf?csf=1&web=1&e=VOjKHp), as applicable for road projects. Chapter 6 of this manual is a stand-alone [Temporary Erosion and Sediment Control Manual](https://wsdot.wa.gov/engineering-standards/all-manuals-and-standards/manuals/temporary-erosion-and-sediment-control-manual) and describes TESC strategies, inspection, sampling and reporting requirements.

### Building Inspectors, Fire Code Specialists, and Maintenance Staﬀ

Building Inspectors, Fire Code Specialists, and Public Works and Facilities maintenance staff must receive training on what to look for and report to construction inspectors regarding TESC and construction stormwater pollution prevention.

*Table 2. New Development/Redevelopment/Construction Stormwater Program Area Training*

| **Audience** | **Curriculum Description** | **Training Delivery** | **Training Frequency** |
| --- | --- | --- | --- |
| Building Development Center staff | LID code applicability per local Ordinance  | * Read local LID codes
 | * Within six months of hire
* Refresher training as needed to address changes in codes and procedures
 |
| Stormwater Plan Reviewers and Project Designers for Capital and Maintenance Projects | Reviewing site plans and reports for new development, redevelopment, and construction activity; applying DDECM (HRM, as applicable, for road projects); and LID principles and codes. | * Site Plan Review Training videos on [Washington Stormwater Center website](https://www.wastormwatercenter.org/permit-assistance/municipal/municipal-events/)
* Local LID codes
* Hydrologic analysis & modeling (e.g., WWHM, MGSFlood)
* CESCL
 | * Within six months of hire
* Obtain CESCL certification within six months of hire; recertify every three years
* Refresher training as needed to address changes in procedures, techniques, and requirements
 |
| Construction Site Inspectors and Road Operations Crew Chiefs | Assessing compliance with TESC, construction stormwater pollution prevention plans (SWPPPs), and applicable drainage codes. Related recordkeeping. | * WSDOT HRM Chapter 6
* Jurisdictional SWPPPs
* CESCL
 | * Obtain CESCL certification within six months of hire; recertify every three years
* Refresher training as needed to address changes in procedures, techniques and requirements
 |
| Building Inspectors, Fire Code Specialists, and Public Works and Facilities maintenance staff | Identifying and reporting deficiencies in erosion and sediment control and construction stormwater pollution prevention. | * Online Erosion and Sediment Control training
 | * Within six months of hire
* Refresher training as needed to address changes in procedures, techniques, and requirements
 |

## Operations and Maintenance

Operations and Maintenance (O&M) training fulfills Permit Special Conditions S5.C.7.e. as well as duties related to S5.C.9.g. This training is geared to staff responsible for:

* + - Transitory-located O&M which means temporary construction sites, work sites, temporary storage sites that store materials.
		- Jurisdictional facilities O&M which include sites that don’t have an Industrial Stormwater General Permit and yet have the potential to discharge pollutants and / or sediment.
		- Inspection of public and private stormwater facilities

### Transitory-Located Field Staﬀ

Field staff working in their normal job duties at transitory project locations (e.g., roads, parks, utilities, capital facility construction, etc.) or responding to emergency situations receive training on Drainage Design and Erosion Control (DDEC) or similar jurisdictional engineering and design standards, operation and maintenance standards, good housekeeping, and BMP selection.

### Jurisdiction Facility Maintenance Staﬀ

Staff whose primary responsibilities or main duty station is a Jurisdictional facility (e.g., Facilities, Fleet, and Solid Waste) receive training on DDEC or similar jurisdictional manual, operation and maintenance standards, good housekeeping, and BMP selection, and applicable Stormwater Pollution Prevention Plans (SWPPPs).

### Stormwater Facility Inspectors

Stormwater facility inspectors receive training on DDEC or similar jurisdictional manual, operation and maintenance standards, inspection procedures, SWPPPs, and recordkeeping.

*Table 3. Operations and Maintenance Program Area Training*

|  |  |  |  |
| --- | --- | --- | --- |
| **Audience** | **Curriculum Description** | **Training Delivery** | **Training Frequency** |
| Transitory-located field staff | Drainage Design and Erosion Control O&M standardsBMP and good housekeeping selection, installation, and maintenance per DDECM, HRM, and the RegionalRoad Maintenance Program (RRMP) | * WSDOT 8-hour RRMP field training
* Read *Jurisdiction SWMPP, activity SWPPPs, and DDECM or similar*
 | * Within six months of hire
* Refresher training to address changes in procedures, techniques, and requirements
 |
| County facility maintenance staff (i.e., Facilities, Fleet, and Solid Waste) | BMP and good housekeeping selection, installation, and maintenance per DDECM or applicable SWPPPIn-depth knowledge of facility SWPPPs | * SWPPP walk throughs
* Read *SWMPP* or *site SWPPP (as applicable)*; and jurisdiction *DDEC*
* Vactor and Street Sweeper Operators also need to read [*Western WA MS4 Permit Appendix 6 – Street Waste Disposal*](https://fortress.wa.gov/ecy/ezshare/wq/permits/MS4_2024_App6_Final.pdf)
 | * Within six months of hire
* Refresher training to address changes in procedures, techniques, and requirements
 |
| Stormwater facility inspectors | * DDEC O&M standards
* BMP and good housekeeping per DDEC
* In-depth knowledge of facility SWPPPs
 | * Read Jurisdiction *SWMPP, site SWPPPs*; and *DDECM*
 | * Within six months of hire
* Refresher training to address changes in procedures, techniques, and requirements
 |

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## Source Control

Source Control training fulfills Permit Special Condition S5.C.8.b.v. Staff responsible for implementing the source control program receive training on source control BMPs and their proper application, inspection protocols, and escalating enforcement procedures.

*Table 4. Source Control Program Area Training*

| **Audience** | **Curriculum Description** | **Training Delivery** | **Training Frequency** |
| --- | --- | --- | --- |
| Source control site inspectors | DDEC source control standards for your JurisdictionBMP and good housekeeping per DDEC | * Read [*Source Control*](https://www.wastormwatercenter.org/permit-assistance/municipal/source-control-inspection-program-guidance-manual/)[*Inspection Guidance*](https://www.wastormwatercenter.org/permit-assistance/municipal/source-control-inspection-program-guidance-manual/)[*Manual*](https://www.wastormwatercenter.org/permit-assistance/municipal/source-control-inspection-program-guidance-manual/)& complete [associated training](https://www.wastormwatercenter.org/permit-assistance/municipal/chapter-8-training/)
* Read Jurisdiction *SWMPP*
* *Washington Stormwater Center Play list:* [*Source Control Inspection Guidance - YouTube*](https://www.youtube.com/playlist?list=PLXny_Je3KsDw5SaFs9eNSw6Vi9GcuviYm)
 | * Within six months of hire
* Refresher training to address changes in procedures, techniques, and requirements
 |

## Code Enforcement

Code Enforcement training fulfills Permit Special Conditions S5.C.6.e and S5.C.8.b.v. Jurisdiction code enforcement staff obtain CESCL certification and training on County DDEC, IDDE, and Source Control code enforcement, policies, and procedures. This includes compliance with erosion and sediment control standards, SWPPPs, and pollution prevention plans.

*Table 5. Code Enforcement*

|  |  |  |  |
| --- | --- | --- | --- |
| **Audience** | **Curriculum Description** | **Training Delivery** | **Training Frequency** |
| Code enforcement staff | Enforcement compliance of DDEC, IDDE, and Source Control codes per the Jurisdiction code enforcement policies and procedures. | * Read Jurisdiction *SWMPP*

And local code* CESCL
 | * Within six months of hire
* Obtain CESCL certification within six months of hire; recertify every three years
* Refresher training to address changes in procedures, techniques, and requirements
 |

## Tracking and Recordkeeping

Jurisdictions must track and maintain stormwater-related staff training records. Tracking and recordkeeping responsibilities lie with the supervisors for their applicable staff. Supervisor responsibilities include ensuring training documents for all applicable team members based on their staff’s roles and responsibilities related to *Sections 1-5* in this *Training Plan Template*. Managers and supervisors must assess adherence with the training plan which will inform annual employee development planning as well as meet the annual reporting requirements.

# Appendix 1 - Permit Conditions Related to Training

S5.C.5.d.iii.

An ongoing training program for all municipal field staff, who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of the trainings provided and the staff trained.

**S5.C.5.f.**

Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

**S5.C.6.e.**

Each Permittee shall ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training must be provided as needed to address changes in procedures, techniques, or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

**S5.C.7.e** ***(This training requirement was moved to S5.C.9.g)***

**S5.C.8.b.v.**

Permittees shall train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staff. Permittees shall document and maintain records of the training provided and the staff trained.

**S5.C.9.g**

Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality.  The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, relevant SWPPPs, selecting appropriate BMPs, street sweeper operation, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns.  Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of training provided.  The staff training records to be kept include dates, activities or course descriptions, and names and positions of staff in attendance.