

**MENTORING AND DEVELOPING NEW STORMWATER
COMPLIANCE PROFESSIONALS
(QSP-DELEGATES IN CALIFORNIA)**



PRESENTED BY:

GERALD R. MONTGOMERY

**CPESC, CPSWQ, CESSWI, QSD, QSP, QISP, CGP-TOR, IGP-TOR,
COMPLIANCE GROUP LEADER, CALTRANS WPCM TRAINER**

Meet the Presenter

- **Gerald R. Montgomery**

- CPESC, CPSWQ, CESSWI, QSD/QSP, QISP. CGP-ToR, IGP-ToR, CGL, WPCM, WPCM Trainer

- **Relevant Experience**

- **Vice-President, Chief Operating Officer at SWPPQUEEN, INC. (DBE/WBE/MBE/SBE) with offices in Sacramento, Red Bluff, Pleasanton, Carlsbad, and coming soon to Fresno.**
- **Former Construction Services and NPDES Manager at the City of Elk Grove, the City of Lincoln, and the City of Citrus Heights.**
- **Over 35 years of experience in Construction Management, and 20 years of experience in Storm Water/NPDES Management.**
- **Sits on several industry and stakeholder committees.**
- **Would rather be at the horse races.**



What We Will Cover Today

- A look at the California Qualified SWPPP Practitioner (QSP) Delegate Training Guidelines
 - The overview of the guidelines
 - The required foundational training
 - The site-specific training (also task-specific)
- Considerations when mentoring and developing new professionals
 - Identifying candidates
 - Safety considerations
 - Investing
 - Ultimate goals
- Questions, Answers, Comments



The Guidelines and Credits

- The QSP-Delegate Training Guidelines were developed by:
 - California Stormwater Quality Association (CASQA)
 - State Water Resources Control Board (SWRCB)
 - Primary technical effort was by California Construction General Permit Training Team (CGPTT). This team is led by:
 - Russ Foster, Shea Companies
 - Brian Currier, OWP, Sacramento State
 - Brandon Roosenboom, SWRCB
- Guidelines were released in February, 2024
- <https://www.casqa.org/resources/training/cgp-training-program/qsd-qsp-training-resources>



Overview of the Guidelines

QSP Delegate Training Overview

- Dischargers may authorize a QSP to delegate visual inspections, sampling and/or SWPPP and BMP implementation activities to others (QSP Delegates).
- The QSP must train each delegate and assess their competence prior to authorizing the delegate to perform stormwater management tasks.
- The QSP must use these QSP Delegate Training Guidelines as the basis for the training they provide to delegates.
- The QSP may use CGPTT-prepared training templates but shall supplement these modules with site-specific information and develop their own training modules based on the provided guidelines.
- The SWPPP must contain a record of QSP Delegate training. The QSP shall provide documentation, as needed, to the QSDs, for inclusion in the SWPPP.
- The QSP reviews work performed by the QSP Delegates including visual inspections, sampling, BMP implementation activities, and other required tasks listed in the SWPPP.
- Each QSP Delegate must complete the foundational training. QSP Delegates assigned to inspecting, sampling, and/or implementing BMPs must complete the corresponding site-specific training.
- The QSP is responsible for the work performed by their delegate(s) and the Water Boards may take action against QSPs that fail to use reasonable care and good judgment (e.g., additional training, suspension or rescission of QSP certification).

Required Training

Required Training

The Discharger may authorize a QSP to delegate some visual inspections, sampling, and SWPPP BMP implementation to trained delegates such as site superintendents, managers, contractors, and coworkers. Prior to performing these tasks, the QSP Delegate(s) must receive training for the tasks they are to perform. The training must contain the following two types:

- **Foundational Training** - Foundational training covers information applicable to all sites and is generally not site-specific. This training may be conducted off the project site and is transferrable between project sites and QSPs. If the QSP Delegate previously received foundational training, it is the QSP's responsibility to verify the QSP Delegate has completed and understands the content. Foundational training must cover compliance roles and responsibilities for all members of the stormwater team, forecast information, and documentation and reporting procedures.
- **Site-Specific Training** - Site-Specific training covers information specific to a particular project site and must include, at a minimum, visual inspection requirements, sampling procedures and/or SWPPP and BMP implementation activities relevant to the QSP Delegate's assigned responsibilities. This training is required at each project site with documents and tools specific to the site conditions (e.g., SWPPP, Construction Site Monitoring Program, use of field sampling instruments).

The QSP may provide the general training components in a variety of formats such as in-class, pre-recorded, or virtual. However, site-specific training elements such as inspecting, sampling, and implementing BMPs must be conducted in the field.

Modules and Recommended Lengths

Modules and Recommended Minimum Training Lengths¹

Training Module	Type	Recommended Minimum Length
1.a Roles and Responsibilities	Foundational	45 minutes
1.b Weather Forecasts	Foundational	45 minutes
1.c Documentation and Reporting	Foundational	30 minutes
2.a Site-Specific SWPPP and Implementation	Site-Specific	20 minutes
2.b Site-Specific BMP Implementation	Site-Specific	30 minutes Plus the Site Walk
2.c Visual Inspections	Site-Specific	30 minutes Plus the Site Walk
2.d Sampling	Site-Specific	60 minutes Plus the Site Walk

¹Regardless of recommended minimum lengths, the QSP must assure and verify that the QSP Delegates are competent to perform the delegated tasks. This may involve more training or more time performing tasks under direct supervision depending on the experience level of the QSP Delegates.

Topic 1 – Roles and Responsibilities

1.a. Roles and Responsibilities

1. Legal Background and Purpose -
 - a. Awareness of related environmental regulations (e.g., Clean Water Act, National Pollutant Discharge Elimination System [NPDES] Permits, air quality and waste regulations, and municipal codes)
 - b. Purpose of the 2022 CGP
 - c. Risk Levels
 - d. Traditional vs. Linear Underground and Overhead Projects (LUP)
 - e. Consequences of non-compliance
 - f. Glossary of terms and list of acronyms
2. Communication Process for Stormwater-related Concerns
 - a. Roles of the Legally Responsible Person, Duly Authorized Representative, QSD, QSP, and QSP Delegates.
 - b. Importance of communication and how to elevate non-compliance issues.

Topic 1 – Roles and Responsibilities

3. Required inspections and tasks for the QSP Delegates, the QSP and the QSD.
4. Inspection Protocols (including what each of the following types entail, when they are required, and who can perform them):
 - a. Weekly inspections
 - b. Pre-event inspections and weather forecasts
 - c. Changes in site conditions
 - d. BMP failures
 - e. Corrective actions

Topic 1 – Roles and Responsibilities

f. Regulatory site visits

5. Construction Site Monitoring Program.
6. Authorized and Unauthorized Discharges.
7. Expectations of Professionalism and Ethics.
8. Site Specific SWPPP Governs BMP Implementation.

Topic 1 – Roles and Responsibilities

1.b. Weather Forecasts

1. Definition of forecast terms
2. Explanation of how forecast information is used within the context of the 2022 CGP, such as the Qualified Precipitation Event (QPE), and what forecast information is required for each site.
3. Description of when to check forecasts.
4. Demonstration of how to navigate National Oceanic and Atmospheric Administration (NOAA) or National Weather Service (NWS) websites.
5. Description of how to document the forecasts within inspection records.
6. Demonstration of how to access and use local weather station and rain gauge data.

Topic 1 – Roles and Responsibilities

1.c. Documentation and Reporting

1. Describe the following documentation and reports:
 - a. Inspection reports
 - b. Weather forecasts (rain logs – might be site-specific (LUP vs traditional))
 - c. Corrective action logs
 - d. Sampling reports
 - e. Non-stormwater discharge reports
 - f. Monitoring
 - g. Unauthorized discharges
 - h. NALs and NELs
 - i. Annual reports

Topic 1 – Roles and Responsibilities

2. Describe when reports/documentation are required.
 - a. Describe when the delegate is to report and/or elevate items to the QSP.
 - b. Describe how to make reports/documents readily available for regulatory inspectors.
 - c. Describe the process for maintaining and updating the SWPPP map.
 - d. Describe SMARTS reporting if the delegate is assigned data entry person duties.
 - e. Describe reporting deadlines.

Topic 2 – Site-Specific Training

2.a. SWPPP Information and Implementation (All QSP Delegates)

1. Provide an orientation to the site-specific SWPPP.
2. Describe communication protocols for review of inspections, sampling results, changes in site conditions, BMP failures, corrective actions, managing regulatory site visits, etc.
3. Review basics of field safety awareness as it relates to CGP compliance.
4. Review hours of operation.
5. Provide a list of site contacts (including phone numbers):
 - a. QSP Delegate(s) responsible for BMP implementation, inspection, and/or sampling
 - b. QSP
 - c. QSD
 - d. Discharger Contact Information/Discharger's Representatives (e.g., site managers, supervisors)

Topic 2 – Site-Specific Training

2.b. Site-Specific BMP Implementation (BMP Implementation QSP Delegates)

1. Describe BMPs used on-site, proper installation of the BMPs, implementation schedule, and where to reference fact sheets or manuals.
2. Discuss common installation issues and maintenance needed.
3. Conduct site field walk using site-specific SWPPP and site map as a guide to BMPs implementation and their locations.
4. Discuss the required maintenance and repair time frames including documenting corrective action completion requirements.

Topic 2 – Site-Specific Training

2.c. Site-Specific Visual Inspection Procedures (Visual Inspection QSP Delegates)

1. Define required inspection types and who can perform them.
2. Review the site inspection form(s) and describe how to document observations.
3. Describe and demonstrate how to properly photograph site conditions to supplement inspections and observations.
4. Address how to time stamp, describe or annotate photos, establish orientation and key to the site map, and archive the photo in the project records.
5. Conduct an initial site inspection with the QSP Delegate.

Topic 2 – Site-Specific Training

2.d. Site-Specific Sampling Procedures (Sampling QSP Delegates)

1. Review site-specific monitoring for stormwater discharges, TMDLs, passive treatment chemical use, dewatering activities, and receiving water, as applicable.
2. Turbidity and pH sampling
 - a. Familiarize QSP Delegates with equipment to measure pH and turbidity.
 - b. Describe how to sample pH and turbidity.
 - c. Practice calibrating instruments and documenting calibration in logs.
 - d. Practice measuring pH and turbidity in samples, if sample collection is not possible, visit each location and discuss logistics of collecting samples at each location.
 - e. Review sampling frequency and timing.
 - f. Describe the following sampling locations:
 - Site discharge locations
 - Dewatering locations (if applicable)
 - Receiving water locations (if applicable)

Topic 2 – Site-Specific Training

3. Non-Visible and TMDL Sampling

- a. Identify when non-visible and TMDL sampling is required based on pollutant source assessment.
- b. Describe how to collect samples for non-visible pollutant monitoring.
- c. Familiarize QSP Delegates with equipment, procedures, and lab contacts for non-visible pollutant monitoring.
- d. Visit site-specific sample locations and discuss the need to collect samples up and downgradient of the triggering event (e.g., spill, BMP breach or malfunction).
- e. Practice collecting samples, if sample collection is not possible, visit each location and discuss logistics of collecting samples at each location.
- f. Review sampling frequency and timing.

Topic 2 – Site-Specific Training

- a. Active Treatment
 - Provide awareness of the Active Treatment System Plan and discuss who is responsible for monitoring.
 - b. Passive Treatment
 - Provide awareness of the Passive Treatment Plan including the Sampling and Analysis Plan and discuss who is responsible for monitoring.
5. General Topics for Sampling
- a. Visit site-specific sample locations (discharge, dewatering, receiving water, as applicable).
 - b. Describe how to photo document stormwater discharge and non-stormwater discharge events.
 - c. Describe how to complete sample documentation, chain of custody forms, field logs, etc.
 - d. Describe sample hold times, shipping, and laboratory analytical methods.
 - e. Describe how to communicate results that exceed action levels or effluent limits.

Topic 3 – Competency and Proof of Training

Competency and Proof of Training

At the completion of the QSP Delegate training, the QSP must determine the delegate is competent to perform visual inspections, sampling, and/or SWPPP and BMP implementation tasks prior to delegating their responsibility. **The QSP is responsible for the work performed by their delegate(s) and the Water Boards may take action against QSPs that fail to use reasonable care and good judgment (e.g., additional training, suspension or rescission of QSP certification).**

QSPs can ensure competency of their delegates by including knowledge assessments (e.g., quizzes) within their training and observing the QSP Delegate perform delegated tasks such as visual inspections and monitoring. The QSP should also conduct a periodic review of the QSP Delegate's work throughout the construction schedule.

QSPs must document the training provided to each QSP Delegate. Prior to performing work at a project site, a training log that includes the QSP Delegate's contact information (name, email, and phone number), the tasks they have been delegated, and associated training shall be documented in the SWPPP by the QSD.

Additional information on the 2022 Construction Stormwater General Permit is found on the State Water Resources Control Board's [Construction Stormwater Program webpage](#).

Considerations – Identifying Candidates

- **Identifying Candidates**
 - **Education**
 - **Experience**
 - **Ability to Learn**
 - **Location**
 - **Availability**
 - **Additional Commitments**
 - **Character**



Considerations – Safety

- **Human Safety**
 - OSHA
 - IIPP Review
 - Site-Specific Safety Assessment
 - Proper PPE and Equipment
 - Vehicle inspections
 - Lead by example
- **Environmental Safety**
 - Good-housekeeping
 - Hazmat Awareness Training
 - See something, Say something



Investing in new professionals

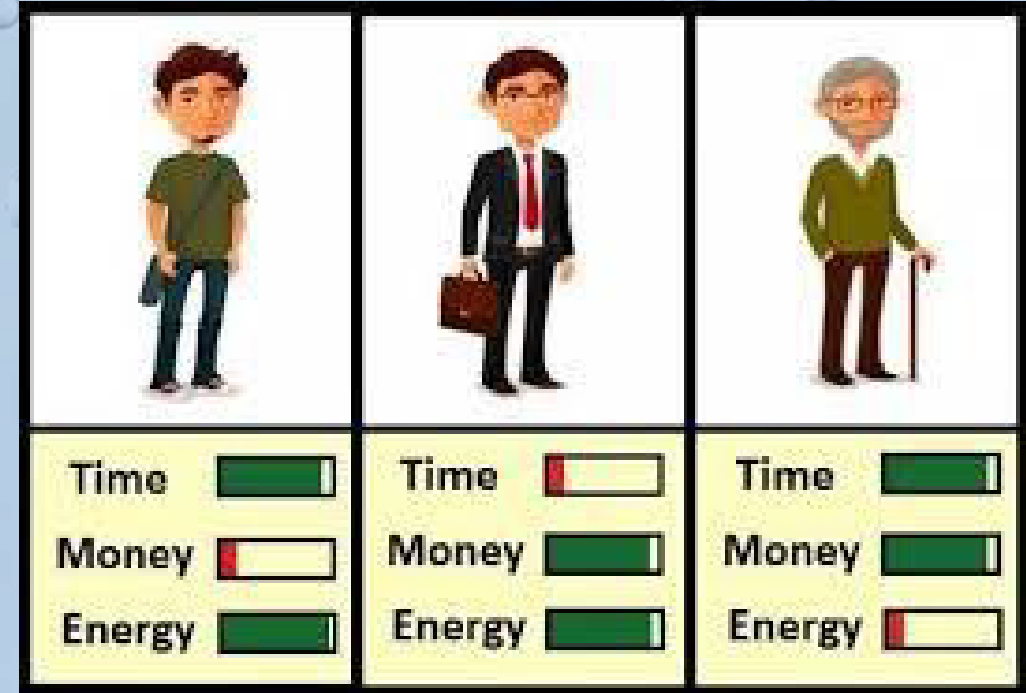
- What is your budget (time and money and energy) for training?

- Required trainings

- Company
- Clients/Job sites
- Safety

- Skill Building

- Regulatory understanding
- Plan reading
- Site-inspections or installations
- WQ/SWPPP Development
- Reporting



Ultimate Goals of Each Party

- **Communication and goal alignment up-front are critical**
 - What does the company need?
 - Short-term
 - Long-term
 - Job assignment vs. career path
 - What does the trainee need?
 - Short-term
 - Long-term
 - Aspirations and goals
 - Culture and Character – Both Ways

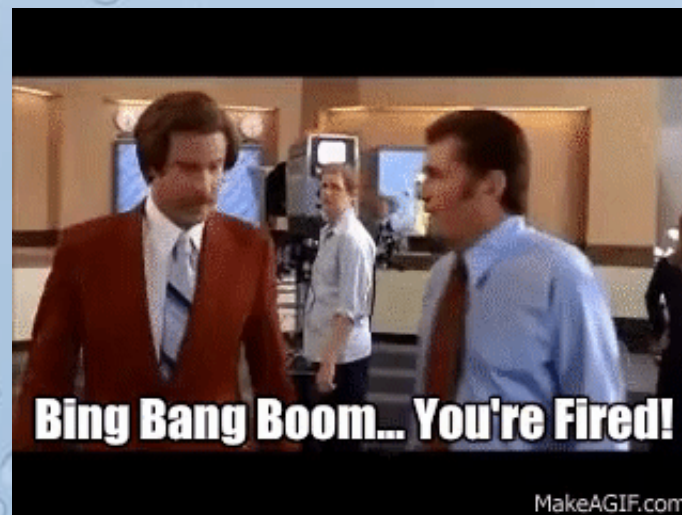


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Always Remember



THANK YOU ALL!



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