



## QISPing Along

### THOUGHTS FROM THE WATER BOARD:

To get a big picture of how the QISP Training Program is working from the standpoint of the Water Board, the Rain Events newsletter recently interviewed Pushpa Zachariah – a Water Resources Control Engineer with the Water Board. Pushpa works in the Industrial and Construction Storm Water Unit, but mainly oversees the Industrial General Permit implementation. In speaking of the QISP training program, she mentioned that since 2016, when the training became available, just shy of **2,000 individuals have become QISPs** through the online training program. However, that number isn't quite representative of the number of QISPs active today. Because this certification has to be renewed every two years, there are currently only about 1,600 QISPs certified at the present time. **And with roughly 8,800 facilities with NOI coverage, that's on average about four dischargers per QISP.** Which sounds like a good ratio of QISPs to facilities, but is that enough QISPs for all the work they have to do? QISPs generally work for Level 1 and 2 ERA status dischargers to complete the evaluations, reports, and training that are required. It was (and still is) the goal of the Water Board when creating this training program to have facilities certify their own on-

For seven years now, the QISP program has been training individuals on how to ensure industrial facilities have compliant storm water programs under the Industrial General Permit. And since 2019, the need for a QISP has expanded with the passing of SB205 and the requirement that a facility discharge assessment be done by a QISP for any facility applying for Permit coverage. In this month's edition of the **Rain Events**, we're going to be hearing from the Water Board, a QISP trainer, and a QISP about how the program is going, what the process of becoming a QISP entails, and their thoughts on the adequacy of the program and applicants.

staff QISP. Pushpa mentioned that while the Permit doesn't require a facility to have a staff QISP (*QISP services can be outsourced*), each facility as a Level 1 or 2 ERA must have a QISP assist them in complying with the Permit, training, and reporting. **Note: a QISP is required at a Baseline status only when a facility is seeking coverage by the Permit and discharges directly to a 303(d) listed water body.**

When asked if the Water Board has observed positive changes to water quality and Permit compliance due to the QISP program, Pushpa responded that **"the QISP program has definitely helped the IGP program run smoother and helped dischargers maintain compliance with the program. QISPs have been instrumental in helping dischargers maintain compliance."** And due to the fact that this program was not designed to be a storm water 101 course for industrial facilities, QISPs are generally very professional and knowledgeable about how the program works and how to maintain compliance. She noted that it "is a robust program that is challenging. People don't generally pass the first time and have to retake the test. It requires a degree of knowledge and professionalism."

But like anything, there is always room for

improvement. Pushpa encourages QISPs to establish good working relationships with their Regional Water Quality Control Board – "it's really important to have that!" And to ask questions. "A lot of questions QISPs have are very site specific. So, talk with other QISPs who have been working in storm water for years. Glean knowledge from them. Go to conferences and engage in continuing education." **And most importantly Pushpa emphasized the importance of staying up to date with the changes of the IGP. "A QISP needs to be aware of new Permit updates."** Speaking of which, the IGP is in the very early stages of a possible renewal, and she encourages the public and QISPs to submit comments to the Water Board by emailing them to [stormwater@waterboards.ca.gov](mailto:stormwater@waterboards.ca.gov).

### THOUGHTS FROM THE TRAINER:

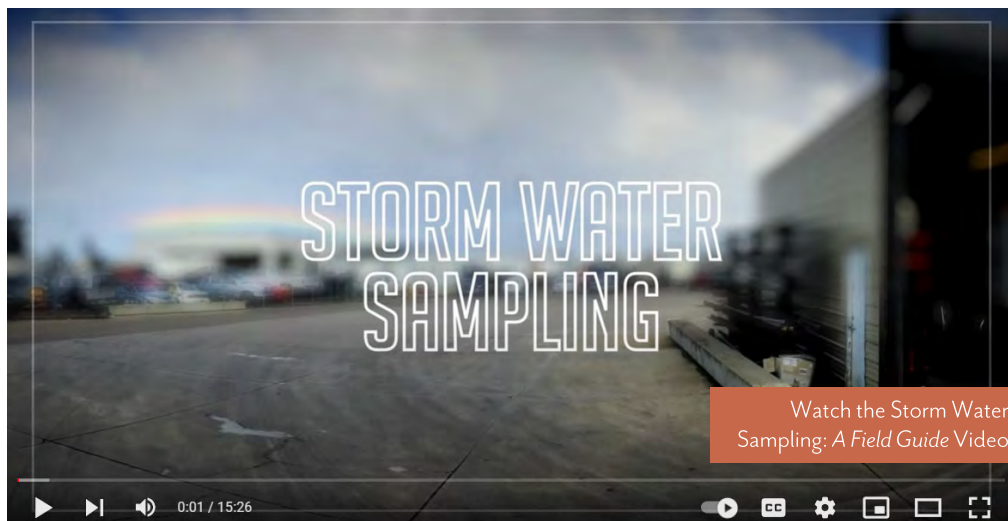
When it comes to QISP training, there's no one better to hear from than one of the most prolific third-day trainers in the State. To do this, we interviewed David Franklin of EnviroTech about what he is seeing in regards to QISP applicants being prepared and ready for the third day training, the exam, and entering the field as a QISP. David offers QISP classes every week and is always ready to train individuals needing their third day of in-person training. When asked what type of

individuals he is seeing coming through the training (facility staff, consultants, municipal staff, etc.), David responded that *“it’s usually a strong 50/50 mix of consultants and industrial or municipal staff.”* It’s not just a certification for consultants.

This online program was definitely cutting edge for its time, and in light of the recent online-only training, David has asked his attendees their thoughts on having the third day of the QISP training program returning to in-person, and they’ve all commented how nice it is to have the ability to ask questions and comment on certain areas of the presentation as the trainer is instructing them. It allows the attendees to bring talking points to the table and get their questions answered. He noted that overall, there doesn’t seem to be any particular questions which are common and across-the-board of people he has trained. The program seems to be pretty effective education and no noticeable gaps seem to be happening. In fact, some really great conversations come out organically from the training content which adds greatly to the scope of the training and the knowledge of the applicant. *Topics have included identifying sampling locations, the value of establishing easy sampling locations, not being too quick to conclude the background conditions are the cause of Level 2 status, and the importance of being diligent in utilizing BMPs to address industrial pollutant sources.* He is constantly encouraging his attendees to “not go down a path that may be easy but not diligent.”

David has instructed more new applicants than anyone else in the State. When asked if he feels new applicants are fully prepared when they join the in-person portion of the QISP training, he commented “in the Industrial General Permit, it’s pretty clear that the average level of understanding and schooling is much higher than the Construction General Permit. It’s rare that an attendee is coming from a facility that suddenly has to get the Permit and they are struggling to understand the process.” He mentioned however, that the downside of an online, self-led learning program is that applicants tend to give fairly repetitive answers in the quiz. It’s unavoidable, seeing how the point of the program is to assist them in passing the exam, but regardless of the program possibly teaching “to the exam”, people going through the training are definitely more advanced in their understanding of environmental science.

In light of the fact that there is always room for



improvement, David mentioned that one thing he would want to draw attention to is the fact that *about 50% of attendees he instructs are not aware of the supplementary sampling video which was released by the Water Board in 2019.* This video (provided above) is a great field guide to industrial sampling and should be something each applicant watches (or anyone who samples at an industrial facility).

**THOUGHTS FROM A QISP:** To get a real boots-on-the-ground perspective of how the program is working, the Rain Events interviewed Aaron Ortiz of WGR Southwest, Inc. As a QISP himself, Aaron stated that he believes the QISP program is working well. He found the “site scenarios”, quizzes, and explanations following the right or wrong answers on the quizzes, as well as the additional learning links particularly helpful. When asked if he felt adequately equipped to meet the responsibilities of a QISP, Aaron responded, *“Yes, I do believe the QISP certification process adequately equipped me for the responsibilities of being a QISP. However, there is no substitution for thoroughly understanding the IGP prior to entering the QISP certification process and on-the-job experience.”* Having a good working knowledge of the Permit and how storm water programs work at industrial facilities is crucial. This course isn’t for beginners. *It’s an intense course that requires a decent knowledge of the Permit.*

However, Aaron did mention that, as far as improving the course, some of the questions in the midterm and final exam feel a little like trick questions which can lend themselves to being more confusing than educational. If he was to improve any area in the QISP training program, he would like to see some clarification to those tricky questions as that would be helpful for future QISPs.

As one QISP to another, Aaron advised, *“a new QISP or QISP applicant should consider accompanying a longer term QISP on projects to see how they do their thing; role modeling can be very useful. If a QISP, (not just a QISP applicant) no matter their experience, has the attitude of being willing or open to learn something new, they will be the best QISP a permittee can have.”* As a QISP for a consulting firm, Aaron noted that while facilities can have an in-house QISP, it might be advisable to outsource to a QISP rather than trying to do it all internally because of the need for ongoing education and expertise. *Trying to be the QISP for a facility and do other tasks (if being a QISP is not your main task at the facility) can be a lot to take on. While it can be done, a staff member might be stretched too thin.*

If you’re wondering what the responsibilities of a QISP are, or have some questions about the training program, check out the [QISP Fact Sheet](#) provided by the Water Board and CASQA (we’ve also attached it to this newsletter). It’s a great resource for what is expected of a QISP and how to sign up to attend the QISP training program and get your certification. Which according to Pushpa, David and Aaron, while there are a decent amount of QISPs today, there is always room for more. You should consider getting certified! **RE**

## The Rain Events

*Lead Editor:* John Teravskis  
OSD/QSP, QISP, CPESC, ToR, IGPTT Participant  
jteravskis@wgr-sw.com  
(209) 334-5363 ext. 110 or (209) 649-0877

*Supporting Editors:*

**Aaron Ortiz**, QISP, ToR, [aortiz@wgr-sw.com](mailto:aortiz@wgr-sw.com)  
(209) 334-5363 ext. 114

**Chelsea Dreyer**, QISP, [cdreyer@wgr-sw.com](mailto:cdreyer@wgr-sw.com)  
(562) 799-8510 ext. 1003

The background of the entire page is a repeating pattern of stylized green leaves. Each leaf is outlined with multiple parallel lines, creating a textured, layered effect. The leaves are arranged in a dense, overlapping manner, filling the entire frame.

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# *Storm Water Contest...*

Each month, we invite our readers to participate in a contest to test their knowledge of the Industrial General Permit and show their storm water compliance program. We enter all submittals to our monthly newsletter question into a drawing and one person is selected at random to receive a \$25 gift card. Last month's contest question was:

*What is an 85th percentile 24-hour storm?*

Congratulations to Jerome who answered our contest question - *"An 85th percentile 24-hour storm is the depth of rainfall at which 85% of all the 24-hour storms on record (historical rainfall data) are equal to or smaller."* Jerome, we hope you have fun shopping for all those home or office renovation project supplies!

## *...This Month's Contest*

*What are some of the duties of a QISP?*

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, April 8th. Email your answer to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com). One winner will be selected by a random drawing to receive a \$25 gift card to Sees Candy.

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# QUALIFIED INDUSTRIAL STORMWATER PRACTITIONER FACT SHEET



The California Stormwater Industrial General Permit (IGP) glossary defines a Qualified Industrial Stormwater Practitioner (QISP) as:

*“Only required once a Discharger reaches Level 1 status, a QISP is the individual assigned to ensure compliance with this General Permit or to assist New Dischargers with determining coverage eligibility for discharges to an impaired water body. A QISP’s responsibilities include implementing the SWPPP, performing the Annual Comprehensive Facility Compliance Evaluation (Annual Evaluation), assisting in the preparation of Annual Reports, performing ERAs, and training appropriate Pollution Prevention Team members. The individual must take the appropriate State-approved or sponsored training to be qualified. Dischargers shall ensure that the designated QISP is geographically located in an area where they will be able to adequately perform the permit requirements at all of the facilities they represent.*

## **Purposes Identified by the IGP for having QISPs**

- To improve compliance and maintain consistent implementation of the IGP (Finding #49);
- To assist the Discharger and other on-site personnel with the implementation of IGP requirements (Finding #50);
- To have a high degree of technical knowledge and environmental experience in the assistance given to Dischargers (Fact Sheet p. 6);
- To improve the quality of the data submitted (Fact Sheet p. 20); and
- To avoid costly retrofits or closure of new facilities that cannot demonstrate that the facility will not cause or contribute to a 303(d) impairment (Fact Sheet p. 26).



## Becoming a QISP

### Ten QISP Roles According to the IGP

1. May represent one or more facilities but must be able to perform the functions required by the IGP at all times (Fact Sheet p. 28).
2. Assigned to a facility that reaches Level 1 and Level 2 status (Fact Sheet p. 48).
3. More accurately identify discharge locations representative of the facility's stormwater discharge (Fact Sheet p. 48).
4. Select and implement appropriate sampling procedures (Fact Sheet p. 48).
5. Evaluate and develop additional BMPs to reduce or prevent pollutants in industrial stormwater discharges (Fact Sheet p. 48).
6. Assist with the completion of the Level 1 Evaluation and preparation of the Level 1 ERA Report (Fact Sheet p. 61).
7. Assist with the completion of the Level 2 ERA requirements and the preparation of the Level 2 Action Plan & Level 2 Technical Reports (Fact Sheet p. 62)
8. Assist New Dischargers in preparing the Stormwater Pollution Prevention Plan (SWPPP) and monitoring program in addition to gaining coverage for New Dischargers that discharge directly to an impaired water body (Order p. 22).
9. Provide training to "appropriate team members" for Level 1 facilities (Order p. 23 & 33).
10. Be informed, responsible, and attentive to the required duties of a QISP while keeping the QISP registration in good standing with the State Water Board and the California Stormwater Quality Association (CASQA) (Fact Sheet p.28)

Sign up for the QISP Training Program by going to the [California State University, Sacramento Office of Water Programs \(OWP\) website](http://www.owp.csus.edu) (www.owp.csus.edu).

After creating an account, click Stormwater Certificates, then IGP QISP. The website guides you through the process of completing the QISP Training Program.

### QISP Training Program FAQs

#### ***Are there prerequisites or underlying certifications required to be a QISP?***

There are no formal prerequisites to be a QISP. There is, however, a practical prerequisite. The material presented in the QISP Training Program was developed for QISP candidates who have basic knowledge of stormwater principles, working knowledge of the IGP, and experience implementing industrial stormwater compliance. This program is not designed for a "Stormwater 101" audience.

#### ***How much time is a QISP candidate allowed to complete the QISP Training Program?***

The training program must be completed within one year of the initial registration date. If your registration expires before you complete all steps in the program, you would need to re-register and restart the QISP Training Program.

#### ***How do I become a QISP?***

To become a QISP, candidates must complete the online training; pass a midterm exam; attend a one- day, in-person class; and pass a final exam.

#### ***How long will the online training take?***

Depending on the level of expertise in the field, it will take 16 hours or more to complete the self-study online training material. This consists of videos, site scenarios, readings from the IGP, information from the CASQA Industrial and Commercial BMP Online Handbook, and quizzes.

## More QISP Training Program FAQs

### ***How many attempts does a QISP candidate have to pass the midterm and final exams?***

The QISP candidate is allowed to take each exam twice. If the candidate does not pass the midterm exam in two attempts, the candidate must pay to re-register and retake the online training.

If the candidate does not pass the final exam in two attempts, the candidate must pay to re-register, retake the online training, complete the midterm with a passing grade, and attend another one-day, in-person class before re-attempting the final exam. A separate fee may be charged for each class attended.

### ***How do I register for an in-person IGP Trainer of Record (ToR) class?***

After passing the midterm, the QISP candidate needs to attend a one-day in-person class with a IGP ToR. Register for a class by visiting the training calendar in the Stormwater Certificates portal at the [California State University, Sacramento Office of Water Programs \(OWP\) website](http://www.owp.csus.edu) (www.owp.csus.edu). A separate fee is charged for this class by the IGP ToR, who will provide payment instruction. When you complete the class, the IGP ToR records your pass/fail in the system. Candidates who pass the class are eligible to take the final exam.

Note that IGP ToRs are required to verify the identity of QISP candidates and their attendance for the completion of the one-day, in-person class. QISP candidates must be attentive during class.

### ***Do California-registered Professional Engineers and Geologists need to take this training?***

California licensed professional civil, industrial, chemical, and mechanical engineers and geologists have licenses that have professional overlap with topics in the Industrial General Permit. The California Department of Consumer Affairs, Board for Professional Engineers, Land Surveyors, and Geologists (CBPELSG) provides the licensure and regulation of professional civil, industrial, chemical, and mechanical engineers and professional geologists in California. The State Water Board developed a specialized self-guided State Water Board-sponsored registration and training program specifically for these CPBELSG licensed engineers and geologists in good standing with CBPELSG. To complete the training and self-certification, create an account on the [Office of Water Programs website](http://www.owp.csus.edu) (www.owp.csus.edu). Click Stormwater Certificates then click IGP CBPELSG.

### ***What is required to renew the QISP training registration?***

The State Water Board, CASQA, and IGP Training Team have not yet determined what is required to renew the QISP training registration. More information will be provided as the date approaches.

### ***What if a QISP Candidate has a disability, such as hearing impairment, that requires special accommodations to access online class material in the QISP Training Program?***

To request online training accommodations, [contact Office of Water Programs by email](mailto:wateroffice@owp.csus.edu) at wateroffice@owp.csus.edu or by phone at (916) 278-6142. Please plan ahead to give yourself adequate time to coordinate your accommodation needs with the Office of Water Programs and to complete your QISP training.