

LAYING THE FOUNDATION

The Monthly Dirt
A monthly newsletter on the California
Construction General Permit

Do your delegated inspectors have foundational training?

With the reissuance of the 2022 CGP, the Construction General Permit Training Team (CGPTT) has just released a guidance document on foundational and site-specific training that QSPs and their delegated inspectors must be well versed in prior to them conducting site inspections. There are required time minimums for this training, required topics, and standards for inspectors that will now need to be met under the new Permit. In this month's edition of **The Monthly Dirt** we are going to break down some of these requirements and help you have the resources you need to achieve compliance.

Inspector Roles – Under the 2022 CGP, there are several different roles listed. Let's do a review of these roles before focusing on the training that is required for QSP delegated inspectors.

QSD: Responsible for pollutant assessment and preparing and updating the SWPPP. And conducting inspections within 30 days of construction activities commencing on a site; within 30 days of a discharger replacing the QSD; twice annually, once August through October and once January through March; within 14 calendar days after a numeric action level exceedance; and, within the time period requested in writing from Water Board staff.

QSP: Responsible for performing a monthly inspection at least once every calendar month (when delegating weekly inspections to a trained delegate); within 72 hours prior to a forecasted Qualifying Precipitation Event (QPE) to inspect areas of concern to verify the status of any deficiencies, BMPs, or other identified issues at the site; within 14 days after a numeric action level exceedance; and, prior to the submittal of a Notice of Termination or Change of Information (for acreage changes) of all or part of a site. The QSP is also required to review work

performed by trained delegates including visual inspections, sampling, BMP implementation activities, and other required tasks listed in the SWPPP. And should a QSP opt to delegate tasks to others, they will be the ones responsible for providing foundational and site-specific training.

QSP Delegate: must be trained by a QSP with foundational training and site-specific training and is responsible for visual weekly inspections, during inspections, post inspections, and inactive project monthly inspections. QSP delegates are also responsible for BMP implementation and evaluation, and the sampling of QPEs if this task is not assigned to a laboratory or the QSP.

Foundational Training Requirements –

According to the Construction General Permit Training Team (CGPTT) [guidance document](#) (see attached) for what is acceptable as foundational training, it states that *“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.” So, in other words, the QSP delegate needs to have a good working knowledge of the CGP and what is required for a construction site. There is a two-hour minimum for foundational training, and the QSP must ensure that the QSP delegate has a thorough understanding and ability to carry out all the training they just received. This training is not required to be given on the jobsite and can be given to the QSP delegate through the means of pre-recorded, virtual, or classroom training.

So, what needs to be covered, exactly, in foundational training? First, an overview of environmental regulations and what is the Construction General Permit and storm water should be given to lay the framework for understanding the importance of protecting storm water and the consequences for non-

compliance – both environmentally and also legally. That way the QSP delegates, who might be new to all things storm water, see the big picture of why everything they will be required to do matters.

Second, delegates will need to be given a basic understanding of the CGP – risk levels, project types, terms and acronyms, and the requirements for construction sites under the Permit. They will also need to know the chain of authority at construction sites for the storm water aspect and the role each one of those individuals holds and how to communicate any non-compliance issues with the appropriate team member.

Next the QSP delegate will need to be trained in all the tasks they will be performing. They will need a thorough knowledge of types of inspections, when to do the inspections, inspection protocol, what to do in the case of BMP failures and necessary corrective actions, and what happens if there is a regulatory site visit. Going over how to accurately define and determine forecasts for inspections will need to be covered as well so that the delegate understands how QPEs work and how to document forecasts in their inspections and what inspections are required based on the forecast.

And third, the QSP delegate will need training on what to do with the various reports required for the site. From inspection reports to weather reports to sampling reports to annual reports, they will need to have a good grasp on what each entail and how to prepare them.

Stressed about where you can find all the resources you need to accomplish this foundational training? Don't worry! You don't have to completely reinvent the wheel. Take advantage of educational resources that are already available. [Storm Water Awareness Week](#) has a ton of great and free recorded workshops that cover these topics. [SWPPP Radio](#) is a podcast about the 2022 CGP. In fact, coming later this spring, the 2024 SWPPP Radio season will feature the content needed for the foundational training for QSP delegate inspectors. So subscribe today! Take advantage of the Monthly Dirt newsletters – you can find our entire archive of newsletters [HERE](#). And there are so many other great resources already available. [BMP Roundup](#) (see attached flyer) is a great training opportunity that gives you hands on education about all things BMPs at the WGR Construction Sandbox.

Site Specific Training Requirements –

According to CASQA, “*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).*” This training is tailored to each project, so unlike

how foundational training is only needed once even if jobsites change, site-specific training will need to be done with each new site. A 2-hour and 20 minute minimum of site-specific training is required. These training topics are contingent on what tasks the delegated QSP will be tasked with doing. However, all QSP delegates will need to familiarize themselves with the site’s SWPPP and be trained in the communication protocol for that site. Field safety training will need to be given even if it’s a just refresher course and basic site information will need to be reviewed. And then depending on the tasks the QSP delegate will be conducting, training will be needed for BMP implementation, visual inspections, and/or sampling procedures. This training is to be conducted by the project’s QSP and must be in the field at the actual site. A site walk, review of the project’s SWPPP, and firsthand experience doing inspections and BMP installation and maintenance are definitely going to be some of the things you are going to want to include in your training. A sampling crash course and how to operate and calibrate pH pens and turbidity meters and record sampling data should be addressed.

After all this training is complete, the QSP must assess the delegate’s competence before proceeding with delegation of tasks. According to CASQA, “*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).*” So it’s within the QSP’s best interest to make sure that delegates have a thorough understanding of what is required of them and observe and assess the delegated tasks periodically to make sure they are being accomplished correctly. All of this training is also to be recorded in the SWPPP by the QSD.

Please contact us if you have any questions ...

The Monthly Dirt

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QPE Assistant

Your Time-Saving Storm Watching Companion

The Challenge: Compliance in the Face of Predicted QPEs

Since the adoption of the 2022 CGP, QSDs / QSPs face increased responsibilities. These regulations now require proactive action in anticipation of 'predicted QPEs,' based on data from the National Weather Service (NWS). This shift from actual rainfall to predicted rainfall demands daily monitoring and time-consuming calculations for each site.

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Ready to simplify your compliance efforts? Try QPE Assistant today by registering for the free Beta trial at [QPE Assistant](#).

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As a token of appreciation, Beta users will receive a 50% discount on the production release for the first year after the Beta period ends. Your early involvement is key to shaping the future of stormwater management.

We are greatly looking forward to your feedback!
Thank you for considering QPE Assistant.



California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

Qualified SWPPP Practitioner (QSP) Delegate Training Guidelines

Developed by the California Stormwater Quality Association and the State Water Resources Control Board through the Construction General Permit Training Team

February 2024

Introduction

A key to compliance with the 2022 Construction Stormwater General Permit (CGP) is the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which outlines the measures used at a specific construction site to manage stormwater runoff and pollutant sources on that site. Section V. of the 2022 CGP details the training requirements and responsibilities for dischargers, Qualified SWPPP Developers (QSD), and Qualified SWPPP Practitioners (QSPs). The 2022 CGP includes an option for QSPs to delegate some of their responsibilities to trained individuals as QSP Delegate(s) to assist with the implementation of SWPPPs. A QSP opting to delegate tasks is required to provide training based on these guidelines set by the Construction General Permit Training Team (CGPTT).

Purpose

The purpose of this document is to provide QSP Delegate Training Guidelines to assist QSPs in training delegates pursuant to Section V.E.1 of the 2022 CGP.

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 revocation of QSP certification).

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 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.

Module Content

The seven modules are described below.

FOUNDATIONAL TRAINING

The goal of the foundational training is to provide all QSP Delegates with the understanding they need to serve as an effective member of the SWPPP implementation team. Concepts covered in the foundational training may be supplemented during the site-specific training to better show how that concept applies to the individual project site. All sections of the foundational training are required for all QSP Delegates. The QSP must provide an overview of the following to the QSP Delegate:

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.
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

- 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.

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.

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
- 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.

SITE SPECIFIC TRAINING

All QSP Delegates are required to complete the training items in Section 2.a, 2.b, 2.c, and 2.d if the delegate is assigned to those duties. The QSP must provide an overview of the following to the QSP Delegate, as applicable:

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)

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.

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.

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)
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.
4. Active and Passive Treatment (if applicable)

- 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.

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 revocation 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](#).