Industrial General Permit
QISP Trainer of Record Renewal Webinar
May 24, 2021

Hosted by:
Industrial General Permit Training Team
Renewal Webinar Agenda

- ToR Certificate Renewal Overview
- IGP Training Program Administration
- Training Techniques & Assessing Training Effectiveness
- Updates and Latest Information from the State Water Board
- Open Discussion (time permitting)
IGP QISP ToR Certificate Renewal Overview
IGP ToR Certificate Renewal

- As per the CASQA-ToR Agreement, to maintain status as an IGP Trainer of Record a ToR must renew certificate
- Purpose of today is to:
  - Disseminate information important to ToRs
  - Understand the renewal process
  - Receive information about training techniques and training effectiveness
  - Receive IGP reissuance update and other regulatory information
  - Provide a forum for ToR discussion / questions
Training Program Goals

The IGP Training Program is intended to help achieve the following goals:

- Compliance with the IGP
- Protection of California's waters from stormwater discharges associated with industrial activities
- Fair, firm, and consistent statewide enforcement of the IGP
Resources for Trainers of Record

- CASQA Web Site
- Industrial & Commercial BMP Online Handbook
  - https://www.casqa.org/resources/bmp-handbooks/industrial-commercial
- Public Access to Trainer of Record contact information and website
  - https://www.casqa.org/resources/qisp-qualification/industrial-general-permit-trainer-record

Industrial General Permit Trainer of Record

Qualified California Industrial General Permit Trainers of Record

View the list of qualified California Industrial General Permit Trainers of Record (IGP ToR) for the official IGP QISP training course.

The IGP Trainer of Record (IGP ToR) qualification process occurs yearly in Spring, typically April – June. Watch the CASQA website and emails for an announcement.

Applicants must submit a Statement of Qualifications (SOQ) and a non-refundable $500.00 submittal fee to cover the review and evaluation of the SOQ. If an applicant is not approved, the applicant may resubmit a SOQ along with a non-refundable $250.00 resubmittal fee the next time CASQA issues a solicitation for ToR applications.

2021 Application Period: CLOSED

1. Download and Review the Request for Qualifications (RFQ)
   - IGP QISP Trainer of Record RFQ (2021) - Includes attachments

2. Pay the SOQ Submittal Fee or the SOQ Resubmittal Fee
   1. Return this page between Friday, April 2, 2021; 9:00 AM PT - Friday, May 7, 2021; 4:00 PM PT (the purchase links will be provided during that time period only).
   2. Important: Please pay the fee allowing enough time to receive your payment confirmation email with the submittal instructions and to upload your SOQ before the submittal deadline.
   3. Applicant must log into their own CASQA account before paying the fee:
      - If you do not already have an account you can create one here or one will be created when you purchase the fee via the link.
      - Please do not pay for multiple applicants through one person’s account.
   4. Pay this fee:
      - New IGP ToR applicants - SOQ Submittal fee: (link removed)
      - Previously not selected IGP ToR applicants only - SOQ Resubmittal fee: (link removed)

3. Submit Your Statement of Qualifications, Upload Confirmation, and Selection Notification
   - Submittal Dates: Friday, April 2, 2021; 9:00 AM PT - Friday, May 7, 2021; 4:00 PM PT
   - Important: Upon payment of the SOQ Submittal fee, you will receive a payment confirmation email with further instructions and a link to upload your Statement of Qualifications. Be sure to check your junk mailbox.
   - A non-refundable $250.00 for your Statement of Qualifications will cover the submittal confirmation fee.
IGP ToR Web Page

- Only accessible to IGP ToRs
- https://www.casqa.org/resources/qisp-qualification/igp-trainer-record-course-information
IGP ToR Virtual Training Option

- Only accessible to IGP ToRs

Steps:
  1. Contact CASQA
  2. Review the Supplement
  3. Prepare a Virtual IGP Training Plan
  4. Conduct Virtual IGP QISP Training
  5. Receive an Audit

https://www.casqa.org/resources/qisp-qualification/igp-trainer-record-virtual-training-option
# Outline of QISP Classroom Training

**Annotated Industrial Storm Water General Permit (IGP) Trainer of Record (IGP ToR) Outline**

<table>
<thead>
<tr>
<th>Training Module</th>
<th>Classroom</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Module 0</strong></td>
<td></td>
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<tr>
<td>1. Provide and agenda for the day</td>
<td>.5 hr</td>
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<tr>
<td>2. Introduction and Background for Order 2014-0057-DWQ (IGP)</td>
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<tr>
<td>• Brief background on the Clean Water Act authority to require this National Pollutant Discharge Elimination System (NPDES) permit in California</td>
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<tr>
<td>• Only covers Discharges to waters of the United States (WOTUS)</td>
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<tr>
<td>• IGP Reissuance Effective Date: July 1, 2015</td>
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<tr>
<td>• IGP Amendment Effective Date: July 1, 2020</td>
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<tr>
<td>• Activities covered (Attachment A, not activities in Section I.B)</td>
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<tr>
<td>• Based on Standard Industrial Classification (SIC) Code system</td>
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<tr>
<td><strong>3. Responsibilities of a Qualified Industrial Storm Water practitioner (QISP, Section IX, Attachment C)</strong></td>
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<tr>
<td>• Activities in the IGP that require a QISP</td>
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<tr>
<td>o New Dischargers with direct discharges (or discharge directly via a municipal separate storm sewer system or MS4) to 303(d) listed water bodies</td>
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<tr>
<td>o Level 1 Exceedance Response Actions (ERAs)</td>
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<tr>
<td>o Level 2 Exceedance Response Actions (ERAs)</td>
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**In-class questions on online content/common questions**

**Module 1 - Background and training layout, this will mention things like the exam is questions only, not guided and that the training pulls from the permit and the scenarios. We can also give a back ground on the industrial permit promulgation.**

**Module 2 - SWPPP and BMPs + 1 site scenario for reference**

**Module 3 - Monitoring and ERAs + 1 site scenario for reference**

**Module 4**

| 1. 2018 General Permit Amendment | 2 hr |
| Total Maximum Daily Loads (TMDLs) | |
| o Definition of a Responsible Discharger (when do TMDL requirements apply) | |

- General Purpose of the Water Board online Map Tool for TMDLs
- Schedule for TMDL implementation (amendment effective date, TMDL-specific schedules in Attachment E)
- Implementation requirements (numeric action levels and additional TMDL numeric action levels, numeric effluent limitations, etc.)
- Sufficiently Sensitive Test Methods
  - What are the IGP permit limits (numeric action levels, numeric effluent limitation, TMDL numeric action levels, U.S. EPA effluent limitation guidelines)
  - How to determine if a method is sufficiently sensitive using Method Detection Limit (MDL) and Reporting Limit (RL) from the laboratory
  - Reporting MDL and RL in SMARTS
- Attachment I Compliance Options
  - Section I: General Provisions
  - Section II: On-Site Option overview
    - Design standard requires the continual 85th percentile volume reeducation and is a larger volume that the design storm standards in Section X of the IGP
    - Requires California licensed professional civil engineer
    - Infiltration BMPs include Maximum Contaminant Level compliance, Table A
  - Section III: Off-Site Option overview
    - Design standard same as On-Site, Regional Water Quality Control Board can approve an alternate draw-down time
    - Agreement requires Regional Water Quality Control Board approval and includes public comment
    - Implementation schedules
  - Section IV: Groundwater Protections overview
    - Applies to On-Site Option and Off-Site Option
    - Local requirements
    - Overview of Table B applicability

2. Receiving Water
- How to determine a facility's receiving water (WOTUS)
- When to apply the tributary rule
- Definition of a New Discharger
- New Dischargers 303(d) requirements and
- Existing Dischargers and 303(d) Impairments
## Outline of QISP Classroom Training

**Revised 2019**

<table>
<thead>
<tr>
<th>1. <strong>Hydrologic Unit Code (HUC)</strong> 10 Watershed and 303(d) impairments</th>
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<tbody>
<tr>
<td>2. Water Quality Based Corrective Actions</td>
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<tr>
<td>3. <strong>Tributary Rule</strong> – Tributaries to WOTUS</td>
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<tr>
<td>4. Provide 1 site scenario on New Dischargers and 303(d) impairments</td>
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### SMARTS (option to use public SMARTS help guides)

- Creating a user account
- Users roles in SMARTS: Legally Responsible Person (LRP), Duty Authorized Representative (DAR), Data Entry Person (DEP)
- Discharger Enrollment for the Notice of Intent (NOI)
- Monitoring Data Entry
- How SMARTS Tracks ERAs
- Annual Reports

### NEC

- Light Industry Exemption – no longer in the regulations
- No Exposure Certification (NEC) Criteria “Checklist”
- NEC in SMARTS

### ERA Process and Examples

<table>
<thead>
<tr>
<th>Option to choose from quiz and exam site scenarios</th>
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<tbody>
<tr>
<td><strong>ERA Timeline</strong></td>
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<tr>
<td>1. Level 1 ERA</td>
</tr>
<tr>
<td>2. Level 2 ERA</td>
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<tr>
<td>3. Industrial Activity BMP Demonstration Option 1 (eliminating numeric action level (NAL) exceedances)</td>
</tr>
<tr>
<td>4. Industrial BMP Demonstration Option 2 (not eliminating NAL exceedances)</td>
</tr>
<tr>
<td>5. Non-Industrial Pollutant Source Demonstration</td>
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<tr>
<td>6. Natural Background Pollutant Source Demonstration</td>
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### Monitoring and Sampling

<table>
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<tbody>
<tr>
<td>1. Defining drainage areas</td>
</tr>
<tr>
<td>2. Determining proper sample location</td>
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<tr>
<td>3. Proper sample collection</td>
</tr>
<tr>
<td>4. Determining correct pollutants</td>
</tr>
<tr>
<td>5. Monitoring documentation</td>
</tr>
<tr>
<td>6. Lab reporting</td>
</tr>
<tr>
<td>7. Sampling Methods</td>
</tr>
<tr>
<td>8. Quality Assurance and Quality Control of samples</td>
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### In-Class IG ToR Discretionary Time

**Examples:**

| 1. **Comprehensive SWPPP development/Review** |
| 2. **QISP Compliance Evaluation Topics** |
| 3. **Monitoring and Implementation Plan (MIP) Review** |
| 4. **Industry Specific Content and Key BMPs** |
| 5. **Ocean Plan Requirements** |
| 6. **Compliance Groups** |
| 7. **No Exposure Certification (NEC)** |
| 8. **Plastic Materials** |
| 9. **Notice of Non-Applicability (NONA)** |
| 10. **Standard Industrial Classification (SIC) code training** (based on SWRCB SIC code video) |

<table>
<thead>
<tr>
<th>Total Time 7 hr</th>
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<tbody>
<tr>
<td>Additional BMPs</td>
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</table>

**Revised 2019**

Total Time 7 hr
Potential Future Resources for Trainers of Record

- Trainers’ “Tool Box” – possible future contents (we welcome your ideas/contributions):
  - Industrial site photos – good and bad BMP examples
  - Inspection/enforcement case studies
  - List of reference web sites / web links for specialized training (e.g., sampling) and other relevant information
  - Short videos (e.g., SMARTS tutorial, background/intent of IGP, enforcement penalties/case studies for non-compliance)
  - Study guide(s) to provide to incoming QISP training course students, to prepare them for the course
  - Fact sheets / other for educating LRPs
  - State Water Board SIC Codes Presentation
  - Other?
IGP Training Program
Administration
Additions to Compliance Agreement

Virtual Training Option: Allowance

CASQA—Industrial General Permit Trainer of Record Agreement

1.7 The Trainer of Record is responsible for handling all financial transactions associated with his/her IGP QISP Training courses. This includes, but is not limited to, registration, course materials, audio/visual, and classroom.

1.8 Unless the Trainer of Record has been qualified by CASQA to offer and conduct training live using the Internet (i.e., virtual training), the Trainer of Record will conduct IGP QISP Training only in-person, physically with his/her students.
Additions to Compliance Agreement (cont’d)

Training Cancellation: Avoidance and Requirements

1.111.12 Given the disruption and waste of time and money caused by the canceling of training courses, the Trainer of Record will avoid cancellations as much as possible. Postponements are preferred over outright cancellations. In any case, at least 48 hours before the scheduled start time of a training course, any change to the timing, location, or delivery of a scheduled training course will be communicated by the Trainer of Record to each registered student and any information about the course posted to the CASQA website will be updated. The Trainer of Record will confirm the receipt of the communication by each student registered in an affected course.
What Happens After this Webinar?

- Sign new 2-year Compliance Agreement – you will receive this via email from CASQA
- Submit 2-year Renewal Fee ($95) online through the CASQA website
- Renewal fee - Sufficient funds to cover CASQA costs of administering the program for 2 years; QISP fees are used for same purpose
- Maintain your QISP status (QISP registration)
- You will be subject to periodic review / evaluation:
  - compliance with the agreement you signed
  - responsible use of training materials
  - complaints / grievances
  - audit(s) of your training classes, etc.
What Happens After this Webinar? (cont’d)

- After your renewal has been processed, CASQA will update the following information on the CASQA website:
  - ToR List: Your name, expiration date, email address
- Reminder: You are responsible for the optional posting of your training scheduled on the CASQA ToR Calendar and ensuring accuracy of posted information
- You are encouraged to keep your company web site up to date at all times, if you have opted to have the public referred there from CASQA site
Roles: CASQA (not a complete list)

- Administer process to qualify Trainers of Record, including final selection and issuance of certificates
- Create/maintain web site and centralized databases for Trainers of Record and QISP (contract with CSUS OWP)
- Develop/maintain exam content, score exams and notify examinees (contract with CSUS OWP)
- Periodically assess and update the minimum QISP Training Program content requirements.
- Manage renewal processes for Trainers and QISP
- Lead investigations regarding complaints against Trainers
- Revoke qualifications status of Trainers of Record, if necessary, based on investigations
Roles: State Water Board (not a complete list)

- Advertise CASQA web site and key events through LYRIS
- Continue to lead the IGP Training Team
- Provide updates on changes to the IGP
- Create/present some training content, including representative photos, inspection/enforcement case studies, and content related to background/intent of the IGP and SMARTS
- Lead investigations regarding complaints against QISPs, and report this information to CASQA
Training Techniques & Assessing Training Effectiveness
Training Techniques

- Adult Learning Principles
  - Studies show that children and adults learn differently, and so different approaches are needed to help adults learn
  - Identification of learning objectives to trainees that are clear and measurable statements of intent
  - Adult learners are task centered and so adult training should be task centered
  - Adults need to know how the information is relevant – relate information to real world scenarios
  - Adults use their life experience to facilitate learning so create opportunities for students to engage and teach others with their experiences
  - Interactive instruction is a critical piece to learning
    - Use case studies, brainstorming exercises, group exercises, facilitated discussions, role-plays, and problem solving
Assessing Training Effectiveness

- Written Pre & Post Tests / Surveys
  - Evaluate a day of training
  - Evaluate a specific module

- Oral Group Questions
  - Integrate into modules to keep trainees engaged
  - Perform at the end of each module
  - Provide small prizes as incentive

- Report out on exercises
  - Evaluate how your exercises were perceived and did they understand instructions
  - Evaluate how well they understood the material
  - Keep exercise materials and modify based on results
Updates and Latest Information from the State Water Board
Compliance Group Leader Responsibilities

Permit Section XIV

- Assist participants in **ALL** compliance activities (§ B.2)
- Exceedance Response Action Reports (§ B.3-8)
  - Submit reports within the given deadline

Reminder:

- § A.5 states:

  *The Executive Director of the State Water Board may review Compliance Group registrations and/or activities for compliance with the requirements of this General Permit. The Executive Director may reject the Compliance Group, the Compliance Group Leader, or individual Compliance Group Participants within the Compliance Group.*
Water Quality Based Corrective Actions

Permit Section XX.B

Required when a numeric effluent limitation exceedance occurs. The Responsible Discharger will need to:

- Evaluate and identify pollutant sources at the facility and assess the implementation measures described in the SWPPP,
- Determine whether SWPPP implementation measures are necessary to reduce or prevent pollutants to meet NELs,
- Submit documentation in SMARTS that the facility evaluation and assessment include:
  - Additional implementation measures that have been identified and included in the SWPPP to meet the NELs, or
  - No additional SWPPP implementation measures are required to reduce or prevent pollutants to meet applicable NELs.
Proper Legally Responsible Person Designation

*Permit Section XXI.K.4*

- No contractors or consultants should be designated as a Legally Responsible Person (LRP).

- LRP eligibility includes:
  - For a corporation: a responsible corporate officer
    - A president, secretary, treasurer or vice president in charge of principal business function
    - The manager of operations, manufacturing or production
  - For a partnership or sole proprietorship: a general partner or proprietor
  - For a municipality, state, federal or other public agency: a principal executive officer or ranking elected official
Open Discussion