

# MS4 Permit Training Requirements

Conducting & Tracking MS4 Staff Training  
**Kelsee York, MS4 Coordinator**



UTAH DEPARTMENT of  
ENVIRONMENTAL QUALITY  
**WATER  
QUALITY**

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# MS4 Training: General

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- **Annual Frequency**
- **Records must include:**
  1. Dates
  2. Activities or course descriptions
  3. Names **and Positions** of staff in attendance
- New Hires trained within **60 days**
- **SWMP must identify tracking mechanism for training**

# Public Education & Outreach:

Training Requirements: Small MS4 Permit 4.2.1.5./JVM permit 4.2.3.11.

## Personnel to be Trained:

- Employees of MS4 owned or operated facilities
  - Most wide-spread training
  - Any/all city staff that could observe an illicit discharge

References to MS4 permit part 4.2.3.11.

## Topics for training:

1. Prohibition of illicit discharges and improper disposal of waste and the impacts to water quality
  - a. equipment inspection to ensure timely maintenance
  - b. proper storage of industrial materials
  - c. proper management and disposal of wastes
  - d. proper management of dumpsters
  - e. minimization of use of salt and other de-icing materials
  - f. benefits of appropriate onsite infiltration
  - g. proper maintenance of parking lot surfaces

# Public Education & Outreach:

Training Requirements: Small MS4 Permit 4.2.1.6./JVM Permit 4.2.1.5.

## Personnel to be Trained:

- MS4 engineers
- Development and plan review staff
- Land use planners
- Other pertinent parties

## Topics for training:

1. LID and green infrastructure practices (general)
  - a. Specific requirements for post-construction controls within MS4 jurisdictions
  - b. BMPs chosen within the SWMP

References to MS4 permit part 4.2.5.5.

# Illicit Discharge Detection & Elimination:

Training Requirements: MS4 Permit 4.2.3.11

## Personnel to be Trained:

- All MS4 staff & contracted staff that:
  - as part of their normal job responsibilities might observe an illicit discharge or illicit connection to the MS4
    - Most wide-spread training
    - Any/all city staff that could observe an illicit discharge
  - Office personnel who might receive initial reports of illicit discharges
- **New Hires trained within 60 days**

## Topics for training:

1. **Identification, investigation, termination, cleanup, and reporting of illicit discharges including spills, improper disposal, and illicit connections. Specifically,**
  - a. Investigation, termination, and cleanup
    - i. (to those involved)
  - b. How to identify a spill, an improper disposal, or an illicit connection to the MS4
    - i. (to any/all city staff that could observe)
  - c. Proper procedures for reporting the illicit discharge
    - i. (to any/all city staff that could observe)

# Construction Storm Water Runoff:

Training Requirements: MS4 Permit 4.2.4.5

## Personnel to be Trained:

- All staff whose primary job duties are related to implementing the construction storm water program including:
  - Permitting
  - Plan review
  - Construction site inspections
  - Enforcement
- Including third-party inspectors and plan reviewers
- New Hires trained within 60 days

## Topics for training:

1. **Annually trained to conduct these activities, including:**
  - a. Permitting
    - i. CGP/CPP permitting requirements
    - ii. Termination requirements (i.e., how does the MS4 ensure that projects are terminated)
  - b. Plan review
    - i. CGP/CPP SWPPP reviews
    - ii. Priority construction site designation
    - iii. Pre-Con meetings
  - c. Construction site inspections
    - i. Meet definition of a “qualified person” per permit part 4.2.4.4.1.
    - ii. SOPs for inspections
  - d. Enforcement
    - i. SOPs for enforcement

# Post-Construction Storm Water Runoff:

Training Requirements: Small MS4 Permit 4.2.5.5

## Personnel to be Trained:

- All staff involved in post-construction storm water management, including:
  - Plan review
  - Maintenance inspections
  - Maintenance enforcement
- Including third-party inspectors and plan reviewers
- **New Hires trained within 60 days**

## Topics for training:

1. **Fundamentals of long-term storm water management through the use of structural and non-structural control methods, including:**
  - a. **Plan Review**
    - i. Post-Construction Control Review
    - ii. Retention standard review (methods, documentation, permit requirements)
    - iii. Water quality considerations
  - b. **Inspections**
    - i. Installation inspections
    - ii. 1/ 2 year inspection SOP (MS4 maintained)
    - iii. 1/ 5 year inspections SOP (owner/operator maintained)
  - c. **Maintenance Enforcement**
    - i. SOPs for enforcement

# P2 & Good-Housekeeping:

Training Requirements: Small/JVM MS4 Permit 4.2.6.10.

## Personnel to be Trained:

- All MS4 employees that have primary O & M job functions that are likely to impact storm water quality, including:
  - Public Works
  - Parks
    - Streets & storm drain
    - Vehicle Washing
    - Landscaping
  - Contracted staff
- **New Hires trained within 60 days**

References to MS4 permit part 4.2.3.11.

## Topics for training:

### 1. **Annually trained, including:**

- a. Importance of protecting water quality
  - i. MS4 Specific Standard Operating Procedures (SOPs)
- b. Requirements of the MS4 Permit
  - i. SWMP Review
- c. O&M requirements
  - i. MS4 Specific SOPs
- d. High Priority Facility Inspection procedures
  - i. MS4 Specific SOPs/Storm Water Pollution Prevention Plans (SWPPPs)
- e. Ways prevent/minimize impacts to water by how they perform their job activities
  - i. MS4 Specific SOPs/SWPPPs
- f. **SOPs** for MS4-owned/operated facilities
- g. **SWPPPs** for MS4 owned/operated facilities
- h. Procedures for reporting water quality concerns (IDDE)
  - i. MS4 Specific SOPs

# MS4 Training: Final Review

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# How to train everyone??

## MS4 Internal

- Powerpoint with all required topics
- MS4 training in conjunction with required HR trainings (new hires)
- SOP Annual Review/Update
- SWMP Annual Review/Update

Don't Forget!!

## SW Community

- USWAC
- Storm Water Coalition Meetings
- Additional certifications (RSI, RSR, RSW, Federal CGP, CISEC, etc)

## External Conferences

- MS4/Contractor Coalition Trainings
- APWA
- Other water user conferences with storm water nexus

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# Questions?

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