

Appendix E
Education Program Guidance for Inspectors, Maintenance and Field Staff

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General training will be conducted as part of the Illicit Connections and Illicit Discharges Elimination Program described in Section 4.G.1.c of the Permit. Specific training on illicit discharges should be conducted for inspectors, maintenance and field staff who may encounter illicit discharges during their regular activities. The following are some of the issues that should be considered when conducting a training program.

- **Who should be trained?** Training for noticing and reporting suspected discharge or disposal may target a broad range of Permittee staff including all field workers and supervisors involved in storm drain system operation and maintenance as well as field inspectors. Training for investigation and follow-up may be targeted at selected Permittee staff with designated inspection, investigation and enforcement responsibility.
- **Who should train?** Trainers selected to conduct employee training should be familiar with both the work performed by the staff and stormwater pollution control principles. A trainer would typically be a superintendent, foreman, or lead worker who oversees the work of small to large crews or inspection staff.
- **What?** The training should cover two major areas: observation/noticing and reporting suspected illicit discharges or disposal; and follow-up to identify the nature and source of the discharge and take appropriate enforcement action to eliminate the discharge.
- **When?** Training can be conducted during regular safety or tailgate meetings or can be scheduled separately. All targeted employees should receive training at least once per year.

The scope of the training should include:

All staff:

- Overview of Clean Water Act and NPDES program
- Potential sources of stormwater pollution
- Potential impact of illicit non-stormwater discharges on receiving waters
- Field observation of illicit discharges/disposal/connections
- Reporting procedures and forms

Staff responsible for investigation and enforcement:

- Identification of nature and source of illicit discharges/disposal
- Municipal code requirements for stormwater pollution prevention on private property

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In March 1997, a comprehensive training curriculum reference document, the *Municipal Activities, Public Employee Trainer Manual*, was distributed to all Permittees for their use. It was developed in response to Permit requirements that Permittees have “training materials for educating appropriate Permittee employees regarding compliance with applicable stormwater permits.” It contains suggestions on how to conduct an effective training program, such as:

- How to determine the appropriate audience
- Steps to organize, prepare and conduct a training session
- How to select appropriate presentation materials for specific categories of employees
- Who to contact regarding questions on the training program

The manual also contains all of the materials necessary to conduct the training sessions, including the presentation narrative, slides, video, and handouts.

Appendix C5 of the manual contains specific information for training staff in illicit discharge control, and suggests best management practices that should be used. Copies of the first two pages of Appendix C5 are attached.

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APPENDIX C5

ACTIVITY CATEGORY: ILLICIT DISCHARGE CONTROL

This activity involves routine inspection for illegal connections to the storm drain system and evidence of illegal dumping activities. Many municipal employees; such as road maintenance crews, storm drain maintenance personnel, inspectors, sanitation workers, etc., can routinely look for and report incidents of illicit discharges to the storm drain system.

[Word Slide MA-C5-1 *Illicit Discharge Control Activities*]

Illicit discharge control is different from the other categories. Most of these BMPs are preventative measures taken by employees to control pollutant sources from the public's activities. Preventative measures include:

- **Illicit connection prevention, detection and removal**
- **Illegal dumping control**

Activity: Illicit Connection Prevention, Detection and Removal

[Word Slide MA-C5-2 *Activity: Illicit Connection Prevention, Detection and Removal*]

- **Prohibit non-stormwater physical connections to the storm drain system** - Ensure that existing building and plumbing codes prohibit non-stormwater physical connections to the storm drain system.
- **Conduct visual inspections during construction** - During the construction phase of new developments, conduct visual inspections to determine if any illegal connections are present.
- **Conduct field screenings** - Conduct field screenings to identify outfalls with characteristics of illegal connections.
- **If needed, use methods to verify physical connections** - Use smoke and dye testing or television camera inspections to verify physical connections.
- **Keep accurate records** - Keep records to track inspections and catalog the storm drain system.

<p>Illicit Discharge Control Activities</p> <ul style="list-style-type: none"> • Illicit connection prevention, detection and removal • Illegal dumping control <p>Word Slide MA-C5-1</p>
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<p>SUGGESTED BMPs</p> <p>Activity: Illicit Connection Prevention, Detection and Removal</p> <ul style="list-style-type: none"> • Prohibit non-stormwater physical connections to the storm drain system • Conduct visual inspections during construction • Conduct field screenings • If needed, use methods to verify physical connections • Keep accurate records <p>Word Slide MA-C5-2</p>
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APPENDIX C5

ACTIVITY CATEGORY: ILLICIT DISCHARGE CONTROL

Activity: Illegal Dumping Control

[Word Slide MA-C5-3 Activity: *Illegal Dumping Control*]

- **Train all employees to recognize and report illegal dumping** - Visual observations of catch basins and outfalls can be used to identify areas of suspected illegal dumpings. The following observations at a site could be indications of illegal dumping.
 - Odors
 - Deposits and stains
 - Liquid present during dry weather, especially if it is colored or is associated with an odor.
 Field analysis of the deposits and liquids present also helps to identify dumpings. pH, dissolved oxygen levels, water temperature, chlorine levels, copper levels, detergents and phenols are all useful analysis to help identify areas of illegal dumping.
- **Call 1-888-CLEANLA or City specific number** - Use this hotline to report illegal dumping and to ask questions about suspected dumping. Several other offices are available for questions and reporting:
 - Stormwater program offices - Your city may have an office devoted to the stormwater program. They should have information about illegal dumping available.
 - Call 911 or the police or fire department to report illegal dumping of hazardous material.

<p>SUGGESTED BMPs</p> <p>Activity: Illegal Dumping Control</p> <hr/> <ul style="list-style-type: none"> • Train employees to recognize and report illegal dumping • Call 1-888-CLEANLA or City specific number <p>Word Slide MA-C5-3</p>

[Note to Trainer: Determine if your city has a specific number for reporting illegal dumping. If there is such a number, provide it in this section.]

[Picture Slide MA-C5-4 *Illegal Dumping*]

- Example of illegal dumping. Any substance being dumped down a storm drain is an example of illegal dumping.
- Call 1-888-CLEANLA to report the incident.

<p><i>Illegal Dumping</i></p> <p>Picture Slide MA-C5-4</p>

Question and Answer Session

[Note to Trainer: Provide some time now for questions on the last section of material.]