2025 ISGP Contractor/Vendor Training NEBC Conference

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Presenter

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Overview

- Contractor/Vendor training requirements went into effect January 1, 2025.
- Purpose: Clarify language and site responsibilities.
- Online presentations with Washington Stormwater Center on new language resulted in clarification/FAQs
- Further training questions addressed.

What Does the Permit Say About Employee Training ?

- Contractors/vendors who perform duties with potential to impact stormwater quality in areas of industrial activities subject to this permit, must be SWPPP trained.
- May exclude if a SWPPP trained employee supervises the activity at all times.

Who Needs Training?

Chemical Delivery Driver

Power Washing Contractor

Sand Blasting Crew

Truck Drivers

Waste Management Company

Landscaping Crew

HVAC Repair

Janitorial Contractor

UPS Driver

Uniform Services

Coffee Catering Co.

Source: Washington Stormwater Center

What Should be in the Training?

- Overview of what is in the SWPPP
  - Who is responsible for maintaining it
  - Where it is located.
- How employees make a difference preventing stormwater contamination by properly maintaining in place BMPs
- Spill response procedures
- Good housekeeping
- Maintenance requirements
- Material management practices

How and When to Train Employees/Contractors/Vendors

- How the Permittee will conduct training
- Frequency: train all employees annually (minimum)
  - Full time: Trained within 90 days of hire.
  - Part time and seasonal: trained within 30 days of hire.
- Keep a Log with the SWPPP
  - Dates of when specific employees received training
  - For a centralized electronic training system: generate a summary report of trainings
  - Make Log available by request

S3.B.5.b-e of the ISGP

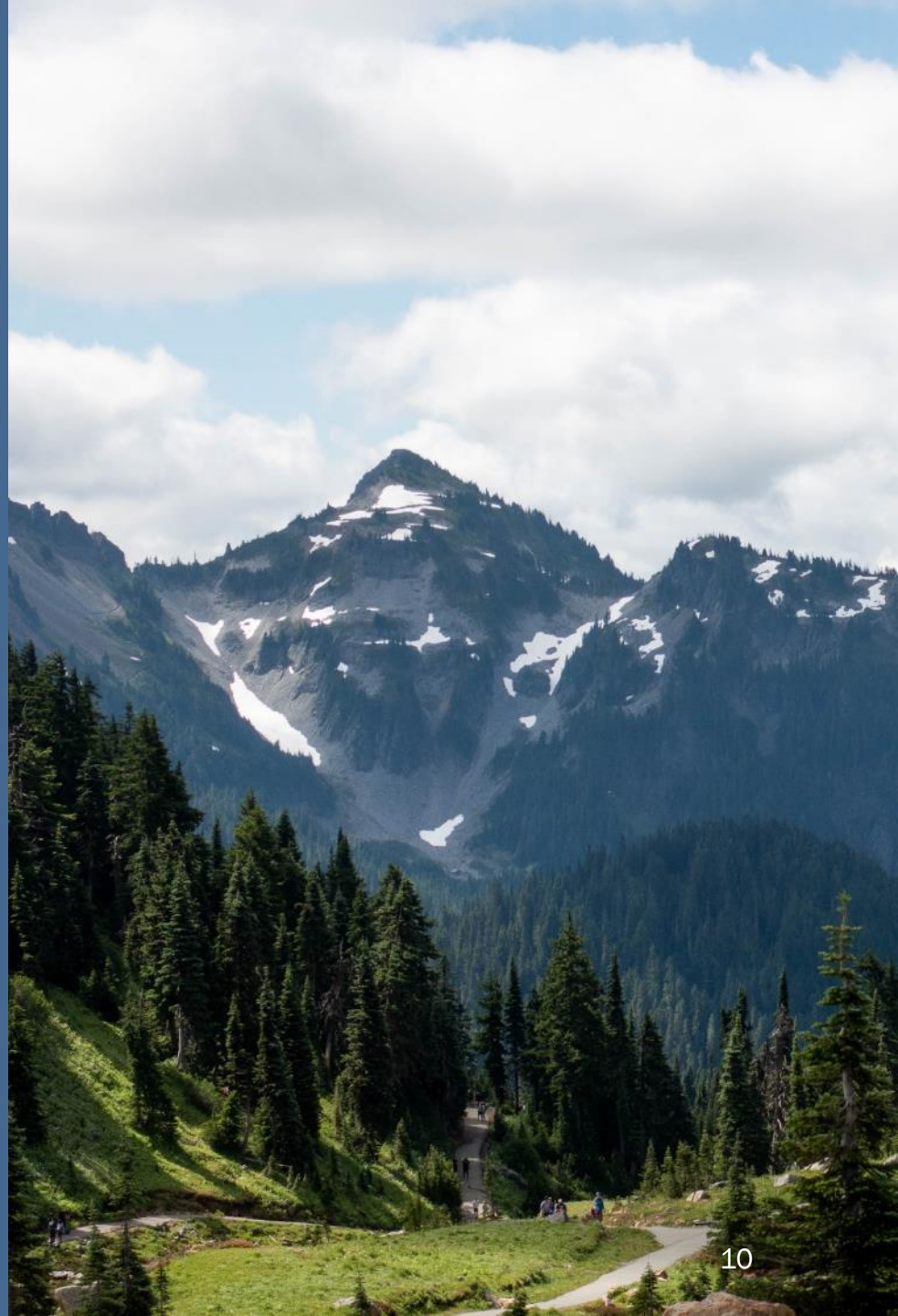
Implementation and Interpretation

The ISGP requires that your training must cover these 3 topics at minimum:

- An overview of what is in the SWPPP
- How employees make a difference in complying with the SWPPP
- Spill response procedures, good housekeeping, maintenance requirements, and material management practices.

In practice, the goal is to spend the most time **on the topics that directly influence how a vendor or contractor interacts with stormwater**.

Frequently Asked Questions



FAQ: Do Tenants need training?

Q: Permittee has a large number of tenants occupying the industrial area. The tenants don't have an ISGP. Is the permittee required to train these tenants?

A: Yes. Tenants, who have a contract/ lease agreement with the site owner/Permittee, who do not operate under their own ISGP, are considered employees and therefore need training on the SWPPP.

FAQ: Do vendors/contractors hired by tenants need training?

Q: What about vendors and contractors that are hired by the tenants?

A: The new permit requires the training for any entity (hired, contracted, either by the permittee or their tenant) on the site that has the potential to impact stormwater quality when they do what they were hired to do.

FAQ: Do customers need training?

Q: Permittee has customers who fuel trucks from their tanks on site. Do these customers require SWPPP training?

A: Customers do not require training. It is the responsibility of your spills team and inspections to ensure customer activity doesn't negatively impact stormwater.

FAQ: Do waste management clients with contracts need training?

Q: Does this scenario change when the waste management company has a contract with the transfer station (i.e. the transfer station is the contractor tasked with taking the waste and the waste management companies are more like the customer)?

A: This would depend on specific contract language and provisions. It is recommended to closely review your contracts. If the contract outlines the waste management company coming on site as a customer, then training is not required.

FAQ: Employee v. Vendor requirements

Q: Section S3.b.4.b.5.c calls out employees specifically as needing training annually without mentioning vendors- but in next sentence outlines vendor training timeline- do vendors and contractors need annual training?

A: Yes, vendors and contractors with duties that will extend beyond one year will need annual training.

FAQ: Training Log

Q: Do we need a signed attestation in the training log?

A: The permit only specifies the name and date of training. Some facilities may want to obtain signatures of the trained people for liability reasons, but this is not a permit requirement.

FAQ: Training Log

Q: Permittee mentioned they have had situations where vendors refuse to provide individual names of their employees for the training log. Do you have any recommendations on how to approach this situation?

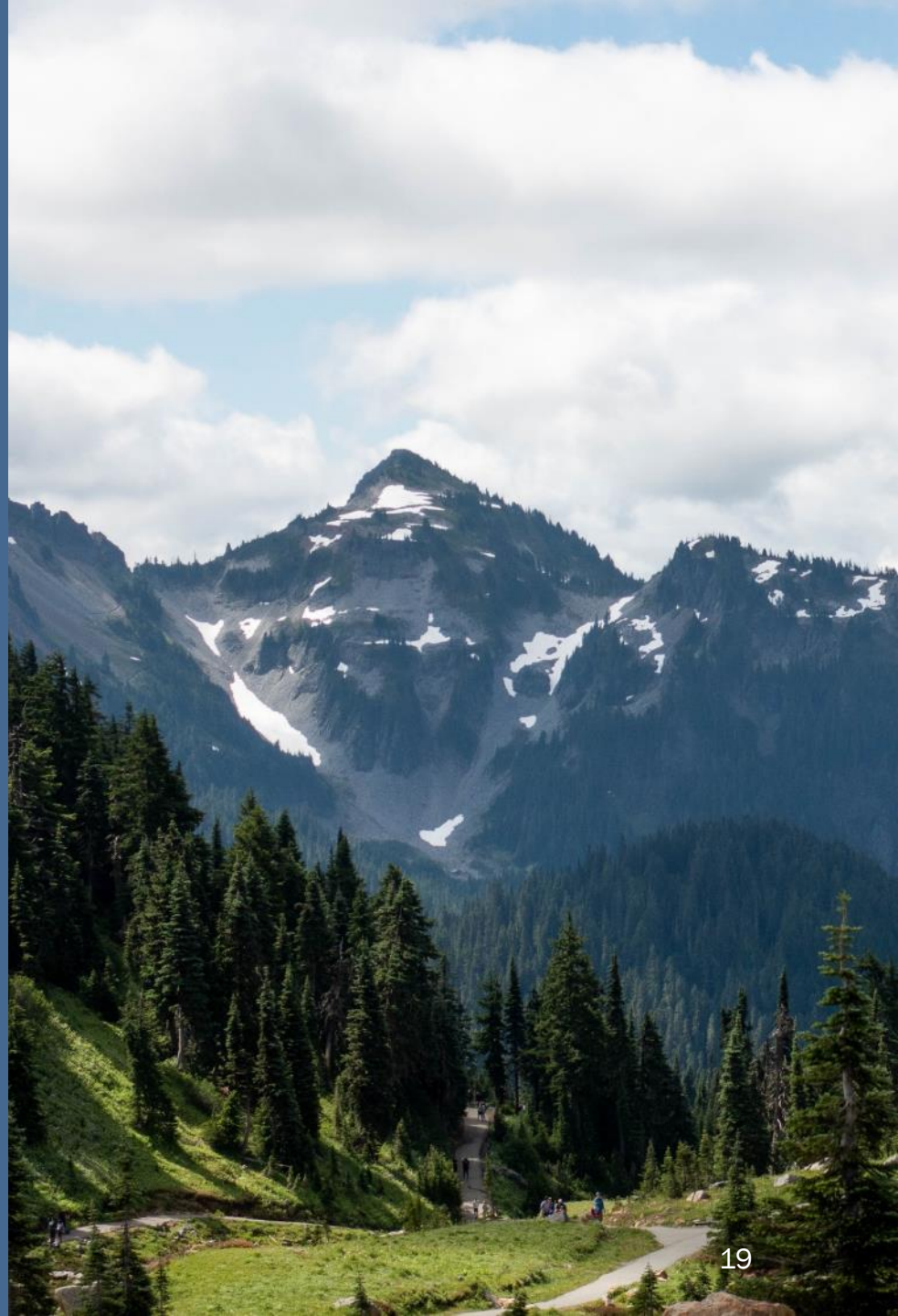
A: It is a requirement of the permit to log the names and date of training for specific employees. We don't have recommendations on how to approach this situation and would leave it up to the Permittee.

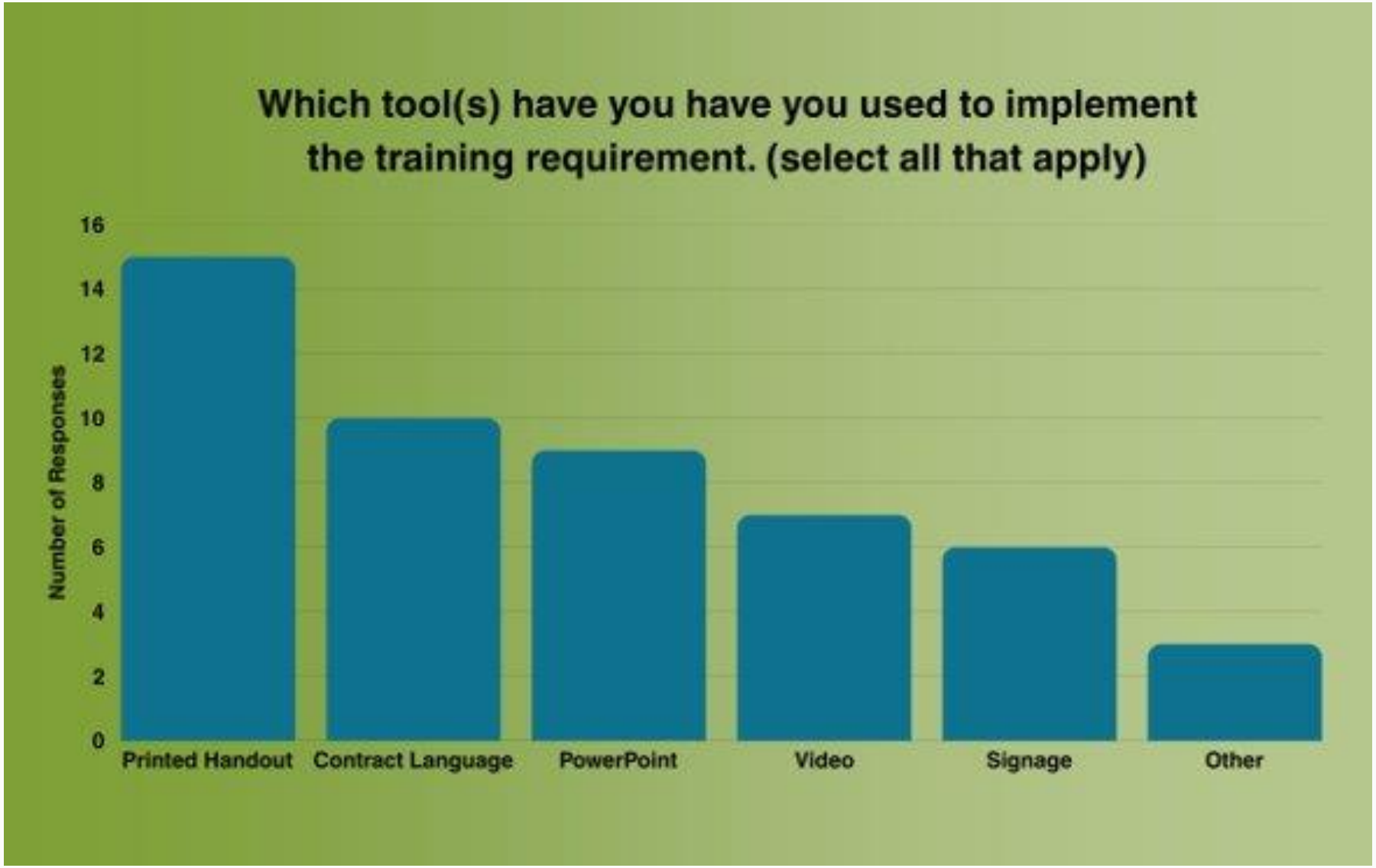
FAQ: Digital v. Print Training Log

Q: Can we have a digital SWPPP and a physical training log (or vice versa), or do all components of the SWPPP need to be in the same format?

A: You may use both formats, as long as both are easily accessible from the same location (i.e. the digital SWPPP is on a computer in the same office as the physical training log).

Permittee Polls





(Source: Washington Stormwater Center)

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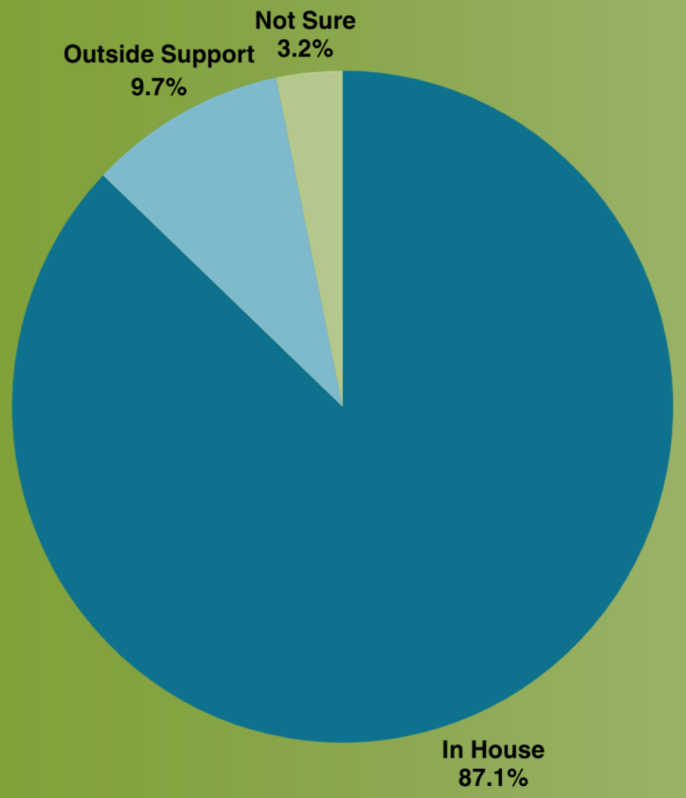
Did you rely on outside support to build or track your trainings or was this done in-house?



Outside support: may include things like hiring an outside trainer, outsourcing a company to build out an online training, or purchasing software dedicated to performing or tracking training.

In House: Trainings are conducted by facility staff, materials and tracking logs were created by facility staff using common workplace software.

(Source: Washington Stormwater Center)

Thank you
Any Questions?

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Online Resources

Industrial stormwater permit - Washington State Department of Ecology

Vendor and Contractor Training for the ISGP – Washington Stormwater Center