

OBJECTIVES

- Increase contractor awareness
 - Illicit Discharges and Detection
 - Good Housekeeping BMPs and Measures
 - General stormwater management
- Prepare contractors
 - Spill Response and Prevention
 - Responsibilities toward the Clean Water Act

DESCRIPTION

Contractor training activities distributes the applicable knowledge and awareness necessary to facilitate a stormwater management program within a municipality to contractors and relative personnel. Training of contractors will provide a municipality with an additional level of preparedness with not only properly implementing and maintaining BMPs, but also reacting to situations that require timely attention including spill response and control. A primary goal of this BMP is to increase the knowledge and capabilities of contractors with proper stormwater management practices as it relates to the municipal SWMP and specifically municipal operations and maintenance.

CONSIDERATIONS

The term "contractors" refers to any entity or personnel of such entity that performs work on municipal property or for the municipality and is not an employee of the municipality. Contractors can include, but are not limited to, general contractors, plumbing contractors, landscape contractors, engineers, inspectors, and so on.

A municipality is the operator of the MS4. Any contractors completing work that will affect an MS4 should be educated in the goals and requirements of the municipal SWMP to reduce the potential of discharges to receiving waters. Note: training is for contractors with an executed contract or agreement with the municipality. A municipality is responsible for its MS4 whether it completes work with its own forces or contracts the work to a private entity.

The contractor training BMP is one of the few within an entire SWMP where the overall measurement of effectiveness is dependent on the success or effectiveness of the other BMPs selected and made a part of the overall municipal program.

RECOMMENDATIONS AND PROTOCOLS

The templates provided within this manual can be used to guide contractor training activities. Refer to the "Documentation" section of this fact sheet.

A degree of responsibility should be extended to a contractor for proper stormwater management practices. This can be achieved through contract language or information reviews.

Based on the objectives listed within this fact sheet, the following represents more detailed guidance regarding contractor training:

Illicit Discharges and Detection

Contractors should be aware and knowledgeable of the municipality's Illicit Discharge Detection & Elimination Plan (IDD&E Plan). Liability through contractual language should be extended to a contractor for self-produced illicit discharges. A notification protocol should also be established between the contractor and municipality if the contractor observes an illicit discharge. This protocol should include initial response measures by the contractor.

General Stormwater Management

A contractor should be aware and knowledgeable of proper stormwater management practices as it pertains to the goals and objectives of the municipal SWMP and the contractor's operations on municipal property.

Good Housekeeping BMPs and Measures

A contractor should be aware of the good housekeeping BMPs the municipality follows. Furthermore, a contractor should be educated on its responsibilities for such BMPs. Example: if a contractor will use hazardous materials for the completion of their work, and the municipality has chosen and follows a hazardous materials BMP, the contractor should be aware and trained on the practice such as proper storage, inspections, and so on as it pertains to the work and is followed by the municipality.

Spill Prevention and Response

Contractors should be aware and knowledgeable to the municipality's spill response and prevention initiatives. A contractor should be required to have a Spill Response and Prevention Plan that aligns with the municipality's objectives and plans. As with illicit discharges, a notification protocol should be established between the contractor and municipality for spills. A contractor should be required to produce spill prevention and response training documentation for its employees to the municipality. If a contractor has not completed spill prevention and response training, a municipality should require such training is completed and aligns with the municipality's plan. Note: a contractor can be invited to municipal training exercises as it pertains to spill prevention and response.

Responsibilities toward the Clean Water Act

Contractors should be made aware of responsibilities to conduct its operations in alignment with the municipal SWMP. This can be achieved through contractual language and training. A contractor can become the "operator" by requiring the contractor to complete a pollution prevention plan that aligns with the municipal SWMP. A review of site plans, if applicable, should be completed (and as required by MCM #4 of the MS4 permit) during the preconstruction period to ascertain any potential impacts by contractor activities.

DOCUMENTATION

Proper documentation practices are essential for any municipal SWMP to show compliance with the Clean Water Act, NPDES, and generally the requirements of the permit issued to allow discharges through the defined MS4. As with all sections of an MS4 permit, all documentation should be centralized.

BMP Fact Sheet: GH-2 Contractor Training

For contractor training, templates are provided within the BMP manual to assist the municipality with documentation compliance. The following templates can be used for compliance:

- **Contractor Training Record:** This document is used to provide record of a training event or session. An attendee's log is required to be attached to all records completed. This template can be used to document a preconstruction review of site plans with a contractor to ascertain potential impacts and outline plans to address such potential impacts.
- **Training and Education Log:** The log provides a general summary of all training activities relative to the SWMP. The log is generally used for municipal employee training and education activities. However, contractor training activities can be noted on this log.

Forwarding relevant information to the contractor for review and understanding in lieu of training sessions can be an acceptable practice. It is important for the contractor to accept the information in written form. These materials can be attached to a training record and entered into the log.

MEASUREMENT OF EFFECTIVENESS

As indicated, the overall measurement of effectiveness is dependent on the success of the selected BMPs in the municipal SWMP. However, effectiveness can be demonstrated by properly documenting training activities conducted relative to contractors and municipal operations and maintenance as recommended in this fact sheet.