

Chapter 9 - Employee Training

Employee training is one of the most important aspects of the permit. All the time and effort undertaken to develop a stormwater program and to write a SPPP is wasted if employees aren't properly trained and do not clearly understand what is expected of them. Sometimes it is difficult to change how people do things. Stressing employee training and not dismissing it as an afterthought shows employees that your Public Complex is serious about its stormwater program and protecting the environment.

WHAT IS REQUIRED?

Minimum Standard

Public Complexes shall develop and conduct an annual employee training program for appropriate employees on appropriate topics. At a minimum, annual employee training will include the following topics:

- i. Waste Disposal Education – Training shall include how to respond to inquiries regarding proper waste disposal.
- ii. Control Measures – Training shall include an overview of the Pet Waste Control, Litter Control, Wildlife Feeding Control, Illicit Connection Prohibition and Improper Waste Disposal Control measures, their requirements, enforcement policy, and hazards associated with improper waste disposal.
- iii. Vegetative Waste – Training shall include details on handling, storage and disposal of vegetative wastes and the frequency of pickups and schedules. Training shall also include alternatives such as composting and recycling.
- iv. Illicit Connection Elimination and Outfall Pipe Mapping – Training shall include information regarding the hazards associated with illicit connections and details of the program including investigation techniques, physical observations, field sampling, and mapping procedures.
- v. Street Sweeping – Training shall include sweeping schedules and record keeping requirements.
- vi. Stormwater Facility Maintenance - Training shall include catch basin cleaning schedules and record keeping requirements.
- vii. Road Erosion Control and Outfall Pipe Stream Scouring Remediation – Training shall include identifying road erosion and outfall pipe scouring and repairs.
- viii. Maintenance Yard Operations (including Ancillary Operations) – Training shall include de-icing material storage, fueling, vehicle maintenance, equipment/vehicle washing and good housekeeping SOPs, if applicable.

- ix. Construction Activity / Post-Construction Stormwater Management in New Development and Redevelopment – Training shall include information regarding the requirement to obtain a NJPDES construction activity stormwater permit (see Part I, Section A.5.a and A.5.b of this permit) and requirements for Post-Construction Stormwater Management in New Development and Redevelopment (See Part I, Section F.3 of this permit).

Measurable Goal

Public Complexes must certify annually the date of the annual employee training.

Implementation Schedule

Training shall begin 12 months from the effective date of permit authorization.

WHAT DOES THIS MEAN?

Employee training is intended to increase employee awareness of the stormwater program and its importance, as well as their role in its implementation. It is believed that if the employees understand what is required of them and why it is being required, they will be more likely to comply with the conditions of the permit. Employees must be trained about the various topics listed above, but the employee training program need not be limited to those topics. All employees should be involved in the training program, but the permit requires training only on those particular topics that are relevant to their job descriptions. For example, maintenance personnel shall be trained on the maintenance yard SOPs, but they don't need to be trained on the design standards in the new Stormwater Management Rules.

Overall, this training program is very important to the success of the Stormwater Pollution Prevention Plan required by this permit. Since the goal of this training is to stress the importance of the permit and the required practices, the training should encourage employees to take an active and environmentally responsible role in the stormwater program.

WANT TO KNOW MORE?

In many ways, education and training may be considered the most important aspect of this program. It is widely recognized that education is the key to providing people with the knowledge, awareness, attitudes and values that will help them play their part in sustaining the environment, not only while they are at work but also throughout life. This SBR specifically targets the employees that work for Public Complexes.

Employee training has two purposes. The first is to familiarize the workers with the permit requirements, and what specifically will be required of them. The second is to give the employees an overview of the stormwater program, why it is being done, and why their participation is important. As mentioned above, if the employees do not understand what is required of them and why it is required then they will not do it. As philosopher Baba Dium said, "We only conserve what we love, we only love what we understand, we only understand what we know and we only know what we are taught."