



BEING READY FOR AN INSPECTION

No matter when the inspector shows up.



Objectives

- Know What Is In The Permit
- Know How to Develop a Compliant SWPPP and Keep It Compliant.
- Being Ready For An Inspection from the DEQ or the City.
- Avoiding Common Pitfalls and Violations



Know What Is In The Permit

- Just getting the permit isn't the end. You need know what is in it so you stay in compliance.
- Use the permit and your neighbors to find the answers to the questions on the next few slides.



Use the permit to answer the question. Write the page number and section number you found the answer on.

- 1. You are done with construction and want to terminate the permit, but have been told the site must be “Finally Stabilized” what do you have to do to reach final stabilization?
- 2. What are 3 signs of visible or measurable erosion?
- 3. When sediment is tracked from a construction site to paved areas how long does the company have to remove that tracked sediment from the pavement?
- 4. What are 4 prohibited water discharges according to the permit?
- 5. When should you make changes to your SWPPP?



Use the permit to answer the question. Write the page number and section number you found the answer on.

- 6. Where should your SWPPP, Letter of Authorization, and copy of the Permit be?
- 7. How long do you have to provide the SWPPP when it is requested by someone in the WQD?
- 8. How big does a secondary containment unit have to be for a bulk fuel tank?
- 9. How often do inspections need to occur for an active construction sites?
- 10. If a self inspection has no problems and is found to be compliant with the SWPPP what must be on the inspection report?



What to expect during an inspection and how to be ready.

- Record Review
 - What you should have on site.
 - LOA, Permit, SWPPP, Inspection Documentation
 - Common issues/ violations.
 - Common Plan of Development/ Permit Status
- Field/ Site Inspection
 - BMPs
 - Common Issues

Problems with paperwork...

What's the point of the SWPPP, and why does the DEQ care about it?

1



2



3





The SWPPP is your plan to avoid these problems?

Avoid Fines

**Avoid
infrastructure
Damage.**

**Avoid polluting
water we all
want to enjoy.**





What Information is required in the SWPPP? Section 8.2

Section 8.2.1- SWPPP
Administrator

Section 8.2.2- Site Description.

Section 8.2.3- Site Maps

Section 8.2.4- Best Management
Practices (BMPs)

Section 8.2.5- Maintenance

Section 8.2.6 – Inspections

Section 8.2.7 - Signature





Section 8.2.1

SWPPP Administrator

- The person or persons responsible for developing the SWPPP, maintaining the SWPPP, and adhering to the SWPPP must be identified by either NAME or POSITION. (This includes those who will be responsible for BMP maintenance and inspections)
- Mistake #1 not identifying people responsible for assigning duties to people not identified in the SWPPP.



Section 8.2.2

Narrative Site Description

- 8.2.2.1 – Nature of Construction Activity
- 8.2.2.2 - Major Activity Sequence.
- 8.2.2.3 – Site Area Estimate
- 8.2.2.4 – Support Activity Discharges.



SWPPP Template

Narrative Site Description (8.2.2)

A brief description of the nature of the construction activity (8.2.2.1):

Proposed sequence of major activities including an estimated completion date (8.2.2.2)

An estimate of the total area of the project site (8.2.2.3):

An estimate of the area expected to undergo clearing, excavation or grading, including off-site materials sources, access roads, areas for support activities and staging/storage areas (8.2.2.3) Note that areas included under a separate WYPDES storm water permit authorization do not need to be included here:



Section 8.2.2.5

A Brief Description of Existing Vegetation

Be Specific and Give % Estimation.

Background



Regrowth

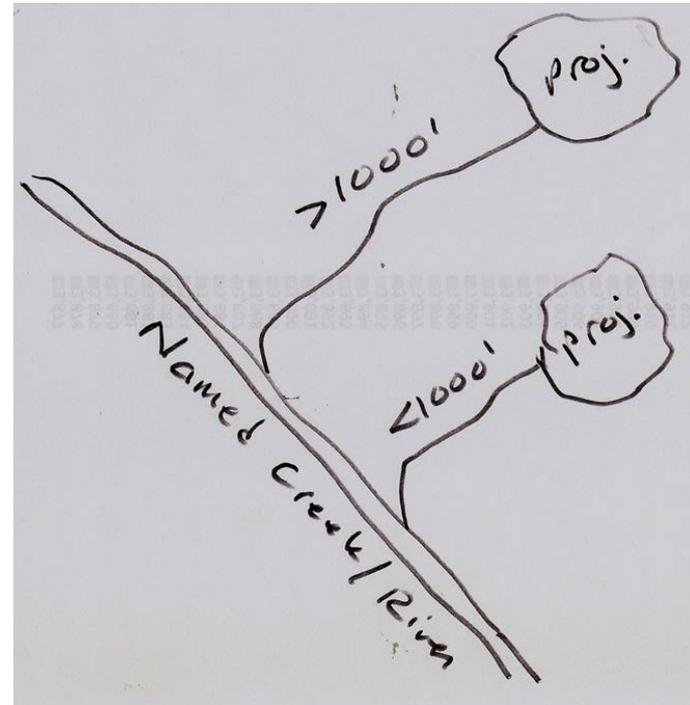


8.2.3 Site Maps

□ **Must contain:**

- North arrow
- Any surface waters
- Areas of disturbance
- Areas left undisturbed
- Storage areas
- Concrete washout areas
- E & S controls.
- Support activity areas covered under this permit.
- SW drainage patterns.
- SW discharge points.

□ **Must be revised EVERY time you make changes to the site**



8.2.4 Best Management Practices

- Must withstand and function properly up to a 2 year – 24 hour storm event.





SWPPP Template

Erosion Prevention BMPs (8.2.4.1a). Clearly describe in detail the storm water erosion control BMPs that will be used at each major stage of construction. Indicate the location of the described measures on the site map(s) as required above. Examples of erosion control BMPs include, but are not limited to, preserving existing vegetation, scheduling (i.e., minimizing site disturbance at a given time), surface roughening, temporary and permanent seeding or planting, soil binders or tackifiers, erosion control blankets/mats, wind erosion control, storm water diversion practices upslope of a construction site, pipe slope drains and outlet protection.



Erosion Prevention BMPs

Erosion controls are designed to keep sediment from moving.

- Preserving existing vegetation
- Scheduling
- Surface roughening
- Permanent or temporary seeding
- Mulches, tackifiers, erosion control blankets.
- Wind erosion control
- Storm water diversion
- Pipe slope drains
- Outlet protections.

Erosion Control Devices

The best erosion control device is to preserve vegetation for as long as possible.





SWPPP Template

Sediment Control BMPs (8.2.4.1b). Clearly describe in detail the sediment controls that will be used at each major stage of construction. Indicate the location of these BMPs on the required site map(s). Examples of sediment control BMPs include, but are not limited to, sediment barriers (such as straw bales, gravel/rock berms, silt fences, fiber rolls and wattles), undercut lots where curb and gutter is installed, exit tracking controls, vegetated buffer strips, grassed waterways, water bars and water wings.



Sedimentation Control

Sediment controls are to keep sediment that has moved from its original spot from leaving the site and entering waters of the State.

- Sediment barriers like, straw bales, wattles, gravel berms, silt fences.
- Sediment traps and basins
- Storm drain inlet protection.
- Track out controls.
- Undercut lots near curb and gutters.
- Vegetative buffer strips.
- Water bars and water wings.
- Grassed waterways.



Sediment Barriers





Inlet Protection?

1



2



3



4





SWPPP Template

Stabilization Measures (8.2.4.1c). Describe temporary or permanent stabilization measures (which include, but are not limited to, cover crop plantings, mulching, rolled erosion control products or surface roughening). Refer to the permit at Part 7.14 for additional information. Please note that implementation of stabilization measures is required in areas where further clearing, grading, excavating or other earth disturbing activities have permanently ceased or temporarily ceased and are not expected to resume for more than 14 days. See the permit at part 7.14 for further discussion and limited exceptions.

Stabilization Measures

Essentially
Erosion
Control.





SWPPP Template

Operational Controls (8.2.4.3)

Good Housekeeping (8.2.4.3a). Describe in detail the good housekeeping BMPs/procedures that will be implemented to maintain a clean and orderly facility. At a minimum, this section shall address litter, debris, chemicals, fertilizers and sanitary waste. Also include measures to remove sediment that has left the construction site.

Bulk Storage of Petroleum Products (8.2.4.3b). Describe in detail the specific practices that will be used for storage of bulk petroleum products. Include spill handling procedures. Those sites that are covered by and in compliance with other relevant plans (such as a Spill Prevention Control and Countermeasure (SPCC) plan) may reference that plan below as fulfillment of this requirement. See the permit for more information.

Concrete Washout and other Related Waste (8.2.4.3c). Clearly describe the specific practices that will be used to contain concrete wash waters. Where applicable, management of concrete grindings and slurry must also be described. Include relevant operations at portable concrete batch plants that are covered under the same authorization as the construction activity.

Employee Training (8.2.4.3e). Describe your training program to inform personnel of their responsibility in implementing the practices and controls in the SWPPP, including, but not limited to, spill response, good housekeeping and sediment control.

8.2.4.3 Operational Controls



- Good Housekeeping**
- Bulk Storage**
- Concrete washout**
- Employee training**
- Sanitary Facilities**



Good Housekeeping and Wyoming.



Bulk Storage



Concrete Washout



Which sanitary facility is in compliance?

1



2





SWPPP Template 8.2.5

Maintenance (8.2.5)

Maintenance. Describe the schedule, intervals or conditions upon which BMPs described in the SWPPP will be maintained. Each type of structural BMP (e.g., wattles, silt fence, rolled erosion control products, basins/ponds, etc.) described in the SWPPP should be addressed. Please note that BMPs found to be in need of maintenance must repaired, maintained or replaced in accordance with Appendix C, Part 2.

Section 8.2.5 Maintenance

- Must have a specific maintenance plan for every BMP.
- Maintenance and installation must meet manufacturers specifications.
- When possible include manufacturer installation and maintenance instructions with the SWPPP





Even the Best BMPs don't work if you don't install them correctly and maintain them!!!





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SWPPP Template 8.2.6

Inspections (8.2.6)

Inspection Schedule. Describe an inspection program and schedule that meets the requirements of the LCGP, Part 9.



Inspections

Requirements

- ***Inspection Reports (see Part 9.7)* Within 24 hours of completing each inspection, you are required to complete an inspection report that includes:**
 - Date/ Time of inspection;
 - Names and titles of persons conducting the inspection;
 - Summary of inspection findings;
 - Corrective actions taken
 - Dates and amounts of precipitation events that exceed 0.5 inches in a 24 hour period.
 - Documentation of any changes made to the SWPPP and SWPPP site map.
 - A statement indicating whether the site complies with the SWPPP or not.
 - The inspection report must be SIGNED and CERTIFIED.

8.2.6 Inspections

Common Errors

- Inspections not being conducted
- Inspections are conducted on a different schedule than what is written in the SWPPP.
 - Special inspection pen.
- Lack of Compliance Statement.
- Inspection not certified.
- Inspection not signed.



8.2.7 and 9.7.8 Certification and Signature

SWPPP Certification (8.2.7):

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. In addition, I certify that I am aware of the terms and conditions of the large construction general permit and I agree to comply with those requirements.

Printed Name of Person Signing

Title

Signature

Date

Telephone

Overview of Common Paperwork Issues

- ❑ The SWPPP is not current to project conditions.
- ❑ The SWPPP lacks appropriate detail to be a good plan, and give a decent idea of what is in place on site.
- ❑ The SWPPP site map has not been updated.
- ❑ The self-monitoring inspections reports are not signed and certified.
- ❑ Lack of specific maintenance schedule for BMPs. (Include Manufacturer recommendations.)
- ❑ ENDING permit coverage prior to final stabilization.

Overview of Common Site Issues

- ❑ Not using the right BMP for the job.
- ❑ Improper installation of BMPs
- ❑ BMPs not being maintained
- ❑ Lack of BMPs.
- ❑ Not cleaning sediment and dirt ramps off sidewalks and paved surfaces at the end of each work day.
- ❑ Sediment tacked onto paved surfaces.
- ❑ SOLD lots are not in compliance with the SWPPP, and have not been stabilized.

Dirt Ramps

Appendix C – 1.3

All dirt ramps over sidewalks to facilitate access across the sidewalk must be removed at the end of EACH construction day.



City of Casper Inspection

- All construction activities for which a permit is required shall be subject to periodic inspections by the city manager or his designee.
- A final inspection will be conducted at the request of the permittee after the construction activity is completed.
- Final approval shall not be given until all work including installation of all drainage facilities and their protective devices, and all erosion-control measures have been completed in accordance with the permit.

Continued.....

- No final approval shall be granted until permanent soil stabilization has been accomplished and permanent vegetation established.
- City's revegetation guideline;
- http://www.casperwy.gov/userfiles/Servers/Server_62983/file/Resident/Environment%20and%20Waste/Stormwater/Revegetation%20Guidelines%20Handbook.pdf

Enforcement

- If it is determined that soils are leaving a disturbed area by wind or water erosion, such person may direct the permittee on the site to install any sediment and/or erosion controls deemed necessary.
- A stop work order may be issued until all issues are corrected. No building permits or occupancy permits issued.
- A permit may be suspended or revoked if permit is issued in error, incorrect information is supplied, or if permit is not being followed as described.
- Or city crews may correct any issues and back charge the permittee.

Continued....

- Permittee has 24 hours to take action once notice of violation is issued.
- Any person found to be in violation shall be deemed guilty of a misdemeanor.
- Each day such violation occurs shall be a separate offense.

Non-permit inspection authority

- **Chapter 13.49 - URBAN STORMWATER QUALITY MANAGEMENT AND DISCHARGE CONTROL**
- Any person engaged in activities or operations, or owning facilities or property which will or may result in pollutants entering stormwater, the storm drain system, or surface waters of the state shall implement best management practices to the extent they are technologically achievable to prevent and reduce such pollutants.

Last Thoughts

- Read the permit
- Follow your SWPPP and your city permit/ guidelines.
- Understand your responsibilities under the common plan of development.
- It's easier to keep up as you go than to catch up due to an inspection from the DEQ or the City of Casper.
- Being a good steward makes for happy neighbors.

Thank You and Links to Resources

- Large Construction:

- <http://deq.wyoming.gov/wqd/storm-water-permitting/resources/construction-general-permits/>

Small Construction

- http://sgirt.webfactional.com/filesearch/content/Water%20Quality%20Division/Programs/WYPDES/sub/Discharge%20Permitting/Storm%20Water%20Permitting-Construction%20General%20Permits/WQD-WYPDES-Stormwater_Small-construction-general-permit%20_2013-06.pdf