



Inspection Requirements of the CGP 2013

Stormwater Outreach for Regional Municipalities (STORM)

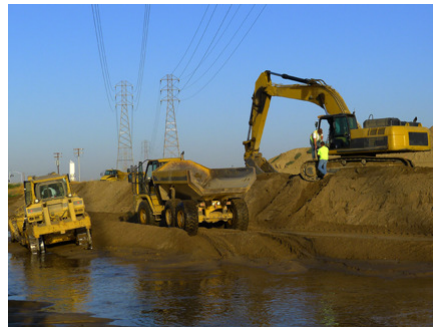
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Inspections of Construction Activities

The Stormwater Construction Program is designed to:

- ❖ Prevent or minimize impact of construction
- ❖ Minimize erosion during construction
- ❖ Control sedimentation
- ❖ Control other wastes at the site



Inspector Qualifications

“Qualified person [or] personnel” - those knowledgeable in the principles and practice of erosion and sediment controls and pollution prevention, with skills to:

- Assess conditions at the construction site that could impact stormwater quality
- Assess the effectiveness of any control measures selected to control the quality of stormwater discharges from the construction activity.
- The operator shall provide **qualified personnel** to perform inspections according to the selected inspection schedule identified in the SWPPP. (see Part 4.1 and Appendix A)



Inspector Qualifications – Signature and Certification

- Who is an operator vs. who is/ can be an inspector?
 - A person with operational control over construction plans and specifications or a person with control over day-to-day activities
- The requirement for a qualified person to be certified and/or registered is unnecessary and is satisfied by experience, training, certification, or any combination.
- Contractors or subcontractors delegated by the operator must sign Section VI.A, because they carried out the inspection and completed the form on the operator’s (permittee) behalf.
 - In such cases, the permitted operator must also sign the inspection report (Section VI.B)
- If the permitted operator conducted the inspection, only Section VI.B must be signed

Minimum Inspection Frequencies

Operators must conduct inspections using one of the following three schedules (see Part 4.2):

- Once every 7 calendar days (regardless of rainfall)
- Once every 14 calendar days and within 24 hours of a storm event of 0.5 inch or greater
- Once per month, but not within 14 days of the previous inspection and within 24 hours of a 0.25 inch storm event

Minimum Inspection Frequencies, cont'd

- Document in the SWPPP:
 - which schedule is being used
 - location of the rain gauge or weather station used to obtain rainfall information
- To ensure control measures will be effective in managing stormwater runoff and associated pollutants, ADEQ encourages:
 - “spot” inspections;
 - adding inspections before and/ or during predicted storm events

Sites located within 1/4 mile of an impaired or outstanding Arizona water

- Increase inspection frequency to every 7 days and within 24 hours of a 0.5 inch storm event (see Part 4.2(3))
- Keeps the operator more prepared in the event it does rain, a control measure fails and there is a discharge to the sensitive water
- Inspection frequencies reduced only for those areas that have undergone temporary or final stabilization
 - Exemption from monitoring doesn't directly correlate to relief on inspection frequencies
 - **Inactive/ unstaffed sites** within 1/4 mile of an impaired water or OAW must inspect on 7 day cycle, unless the site has been temporarily stabilized. Operators are encouraged to stabilize these areas as soon as possible, at which point they may reduce inspection frequencies

Reduced Schedule (see Parts 4.2(2), (4))

Permissible situations

- Stabilized areas
- Discharges unlikely based on seasonal rainfall patterns
- Runoff unlikely due to winter conditions

Conditions:

- Once per month (but not within 14 days of the previous inspection) and
- Before an anticipated storm event and
- Within 24 hrs of the end of each storm event of 0.5 inch or greater in 24 hrs

Inactive/ unstaffed sites – no construction activity anticipated for at least 6 months (see Part 4.2(4)(a) – (g))

Rain Gauge v. Weather Station

- The permit is flexible with the rain gauge location:
 - Within the area of operational control for the permitted site.
- The operator may use the local weather station instead of an on-site rain gauge
- Document in the SWPPP the location of the rain gauge or weather station used to obtain rainfall information

Do you inspect only at the end of a storm event?

- Rather than try to define the end of a storm event, the permit allows more flexibility to inspect when 0.25 or 0.5 inch precipitation has occurred, regardless of whether or not the storm has ended.
- **If the storm event has accumulated 0.25 inch or 0.5 inch, inspectors should perform an inspection, whether the rain has ceased or not.**
- Otherwise you may miss the opportunity to observe physical characteristics (color, odor, clarity, etc.) of the discharge (see Part 4.3(11) and 4.4(5)).
 - Noting the physical characteristics is a simple and expedient way to assess whether control measures are working properly.

Inspections – What to look for during a site inspection (see Part 4.3 for complete scope):

Common problems

- Trash and debris
- Spills and leaks
- Condition & effectiveness of control measures
- Stabilized areas (temporary or final)
- Prohibited discharges (concrete washout)
- Areas used for storage of materials that are exposed to precipitation

Examples



Scope of Inspections, cont'd

- Trackout where vehicles leave the site
- Site conditions for the evidence of, or potential for, pollutants to enter the MS4
- Discharge locations for evidence of pollutants
 - Required only during normal business hours;
 - Inspections not required under adverse conditions. If suspended due to adverse conditions, note in SWPPP, resume inspection as soon as practicable.



Inspection Follow-up (Part 4.5)

- Implement the changes in accordance with the schedule described in “General Maintenance Requirements” [see Part 3.1(2)(a)&(b)]
 - Initiate work to fix the problem immediately, and
 - Complete the end of the next work day

- **Note:** Routine maintenance does not constitute a corrective action and need not be documented in the SWPPP [see Part 3.1(2)(a)]

13

Inspection Follow-up, cont'd

- When installation of a new control is needed or a significant repair of an existing control is needed (not in response to a corrective action [see Part 3.1(2)(b)]):
 - Install the new or modified control and make it operational, or complete the repair, within 7 calendar days from the time of discovery
 - If infeasible to complete within 7 calendar days or before the next storm event, document why and schedule for installation in the SWPPP
 - Modify SWPPP when these actions result in changes (within 7 calendar days)

Inspection Follow-up, cont'd

- Based on the findings of the inspection, the operator must implement any changes necessary to comply with Part 3
- Revise the SWPPP as needed, in accordance with Part 6.5
- Determine if Corrective Actions are required, in accordance with Part 5

Corrective Action Triggers (Part 5.1)

Corrective actions are actions the operator takes ... to modify, or replace any control measure that failed to meet the conditions of Part 3 ... If any of the following conditions ... occur resulting in or from a failure of a control measure, the operator shall implement new or modified control(s):

- 1) A necessary control measure was never installed, was installed incorrectly, or not in accordance with the requirements in Parts 3.1 and/ or 3.2; or
- 2) A prohibited discharge is occurring or has occurred; or
- 3) ADEQ or USEPA determines that modifications to the control measures are necessary to meet the requirements of Part 3.

Maintenance v. corrective actions

ADEQ does not consider routine maintenance or repairs as a corrective action.

Corrective actions are a higher level of response required by the permit to address discharges that can cause or contribute to SWQS exceedance(s).

“**Corrective action**” – any action taken to:

- (1) modify, or replace any ineffective control measure used at the site;
- (2) mitigate any conditions that resulted in a discharge of pollutants above surface water quality standards; or
- (3) remedy a permit violation.



Corrective Actions

Corrective Action (CA) Deadlines (Part 5.2):

- Complete CA within 7 days
- If not feasible, document why and establish a schedule to complete

Corrective Action Report (Part 5.3):

- CA must be documented in the inspection report form
- If any portion of a site is located within 1/4 mile of impaired water or OAW must submit CA report to ADEQ

Use A Standardized Inspection Report Form

ADEQ's experience has shown that incomplete inspection reports were the result when the sample form in the 2008 CGP was not used.

Advantages to using standardized form:

- provides better organization of the inspection report
- consistency of content
- makes ADEQ's review more efficient

Standardized Inspection Report Form, cont'd

- ADEQ's Inspection Report Form is optional
- You can use an equivalent form provided that it documents all of the information required by the permit (see Part 4.4)
- Keep completed inspection forms with the SWPPP or in electronic format

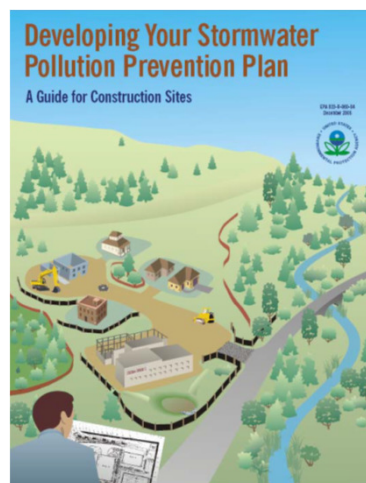
ADEQ's Field Inspection Report


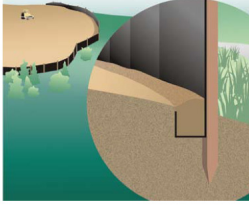
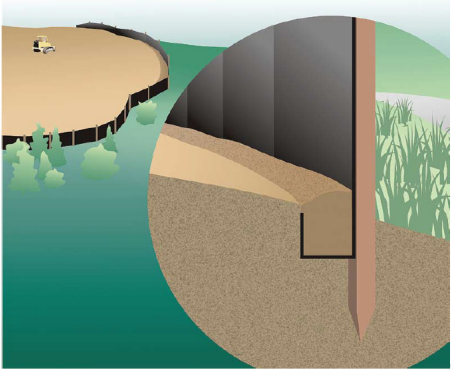
- **New form** implemented by the ADEQ Water Quality Compliance Section
 - Receive instant findings from the inspector (instead of the 30 – 45 day wait for an ADEQ report)
 - Implemented for all WQD programs
- In use now, but ADEQ is incorporating continual feedback from the field
- Available via e-mail; contact:
 - Daniel Czecholinski, Supv., Utility Field Services Unit: czecholinski.daniel@azdeq.gov

21

Recommended Resources:

- ADEQ's 2013 CGP;
- EPA's SWPPP Guidance document – Chapter 6;
- ADEQ's Inspection & Corrective Action form
 - or use a standardized form of your own creation that meets all the requirements in Part 4.4



  Stormwater Construction Inspector's Field Guide A Field Guide to Complement the MPCA Stormwater Construction Inspection Guide August 2008 wq-stm2-11	 Stormwater Construction Inspection Guide Minnesota Pollution Control Agency August 2008 wq-stm2-10
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	<h2>Construction Site Stormwater</h2>
	
<h3>Questions?</h3>	
	