

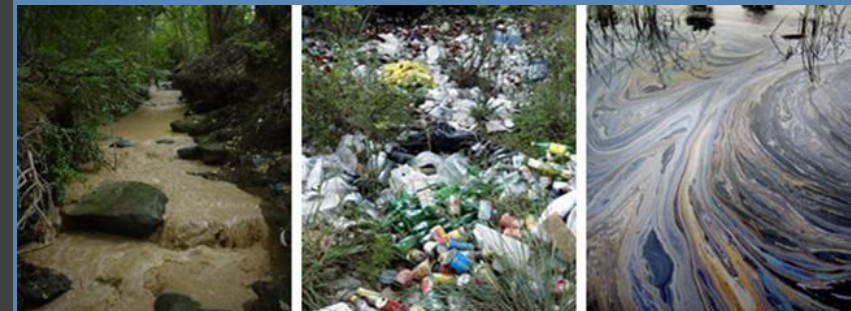
# Construction Stormwater Permits

## How to Comply?

Public Education and  
Outreach

Sponsored by STORM

June 2018





STORM

Construction Stormwater Seminar 2018

Gilbert, Arizona

Presented by:

Rosi Sherrill



## How to Comply with Construction Stormwater Permits:

- Updates on new CGP
- Applying for Coverage
- Common Plan of Development
- Opting Out



# Updates on New CGP

## CGP Crosswalk: 2013 v. 2018

Area of Modification	Existing Permit	Proposed New Permit
<b>Overall</b>	Too long, redundant explanations/details (40 pages)	Less redundancy, clearer explanations (23 pages)
<b>Erosivity Waiver</b>	Provides calculation methods and requirements for applicability	myDEQ does the calculation and if applicable, offers this option to the permittee at the time of NOI submission
<b>Responsibilities of Operators</b>	Multiple operators were allowed to submit for coverage. In some instances, this allowed for compliance issues as there was no "one" responsible party.	The owner of the project is considered the permittee
<b>Submission of NOI</b>	Information including name, project type, etc.	Changes to the information in order to meet current myDEQ and EPA e-reporting requirements; receiving waters and latitude/longitude of any outfalls are new requirements
<b>ADEQ Acceptance of NOI with no Discharge to an Impaired/OAW</b>	Human review, typically 1-2 days	myDEQ review automatic
<b>ADEQ Acceptance of NOI with Discharge to an Impaired/OAW</b>	Human review + SWPPP review, typically 7-15 days	myDEQ review + human review of SWPPP, same time frame
<b>Not-attaining Waters</b>	Not specifically addressed	Added to all references of Impaired/OAW as applicable
<b>Requirement to Post Notice of Permit Coverage</b>	Line item in SWPPP section	Moved up and given its own section
<b>Termination of Coverage</b>		Minor changes related to myDEQ
<b>Effluent Limitations and SWQS</b>	(12) pages of control measures with redundant detail	Modelled after EPA's ELG Final Rule for Construction, May 5, 2014 and EPA CGP 2/14/2017. Reduced to (5) pages. Will provide additional detail if necessary in Fact Sheet.
<b>Routine Inspections</b>	Every 7 days	Every 14 days
<b>Stormwater Monitoring</b>	Impaired waters were monitored for the pollutant causing the impairment; OAWs were monitored for sediment. Any discharge within 1/4 mile had to submit SWPPP.	Only impaired/not-attaining for sediment will be monitored; OAW will still be monitored for sediment. Only have to submit SWPPP for direct discharge to OAW or impaired for SSC.

## myDEQ | User Roles Defined

Revised on: March 7, 2018 - 6:32pm

### The following is a listing of myDEQ user roles:

#### Responsible Corporate Officer (RCO)

The RCO is the main account holder with the ability to manage one or more companies. The RCO has the authority to legally bind the organization and is responsible for certifying the Subscriber/Signature Agreement and submitting all the necessary documents for setting up a myDEQ account. An RCO can delegate to each of their company by adding one or more Delegated Responsible Officer to their myDEQ account.

#### Delegated Responsible Officer (DRO)

A DRO acts on the behalf of the Responsible Corporate Officer (RCO) overseeing all myDEQ account activities. The RCO receives email reports on activities certified by the DRO and assumes all responsibilities for activities completed within their myDEQ account.

#### Submitter

The RCO or DRO can assign a Submitter to submit compliance reports for any permit they choose to allow.

#### Data Entry

The RCO or DRO can assign a Data Entry user to prepare permit/regulatory applications for the RCO and/or DRO to review and submit to ADEQ. The user can also prepare compliance reporting data for the Submitter, DRO to submit to ADEQ.



**AZPDES Stormwater  
Get New NOI**

USER GUIDE



## retail village



Selected perspective sketches I did for a luxury retail village in Shuzhou China designed in a mix of Italian & modern architecture style. This is one of the several retail villages developed by Stage International Luxury Brand in China.



- No Discharge Certification
  - Similar to a No Exposure Certification on MSGP projects
  - No fees at this time
  - No estimated availability date at this time





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**THANK YOU!**



# Municipal Codes and Enforcement

Cities apply for coverage under an MS4 permit to discharge stormwater (NOI) and may terminate coverage (NOT)

Cities are required to adopt and implement local ordinances or other regulatory mechanisms that provide adequate enforcement procedures to control discharges into the MS4

# Municipal Codes and Enforcement

- At a minimum – prohibit connections, control spills, prohibit disposal of materials, require compliance with ordinances (permits, contracts, orders)...
- *Require owners/operators of construction activities to minimize the discharge of pollutants to the MS4 through the installation, implementation, and maintenance of stormwater control measures...*

# Municipal Codes and Enforcement

- Construction Activity Stormwater Runoff Control
  - Minimize or eliminate pollutant discharges to the MS4s
    - Require sediment and erosion control
    - Maintain inventory of activities
    - Document inspections and enforcement
    - Have written procedures for site plan review
    - Train staff
    - Provide education to construction activity operators

# Municipal Codes and Enforcement

- To the extent allowable under State law have methods to enter private property to inspect for compliance, and
- Require violators to cease and desist, clean up, or abate unlawful discharge
- Or be cited with civil or criminal sanction

# Municipal Codes and Enforcement

- Provide departments, roles, responsibilities and keep an up-to-date org chart
- Including local administrative and legal procedures

...and to provide a plan on how it will exercise its legal authority

# Municipal Codes and Enforcement

- Some municipalities have a shop of one; some, have 10, 50, 70
- In a smaller city, everything may be managed by Public Works or Streets
- In another, it could be Planning and Development
- In all cases, there is an interested public

# Municipal Codes and Enforcement

- Each member city has provided information to that end
- With the roll out of a new State construction permit, processes are likely to change slightly in the municipal world
- Spreadsheet will be managed on STORM's website

# Pollution Prevention Plans

Have at least one per project or site

Include all potential sources of pollution

Describe and ensure implementation of control measures

Identify the responsible person for on-site implementation


Sign (by appropriate person)

SWPPP template and/or CGP Checklist  
<http://azdeq.gov/AZPDES/SWPPP>



# Pollution Prevention Plans


Who will be doing the  
identified work




What types of activities will  
commence



When will the project start and  
stop; what hours and which days



Where will runoff go, if it  
happens to rain (SITE MAP!)



How will the potential pollutants  
be minimized in discharges

# Pollution Prevention Plans

## Who is doing the work

- Day-to-Day
- Oversight
- Finances

## When will work occur

- During a normally dry period
- During monsoons
- On weekends, at night

# Pollution Prevention Plans

## Pollutant Sources

- Activity (clearing/grubbing vegetation, grading, excavating, stockpiling soil)
- Equipment (simply driving over dirt, parking vehicles)
- Storage and disposal areas
- Concrete and asphalt

## Pollutants

- Dirt
- Oil/grease
- Lime
- pH
- Trash

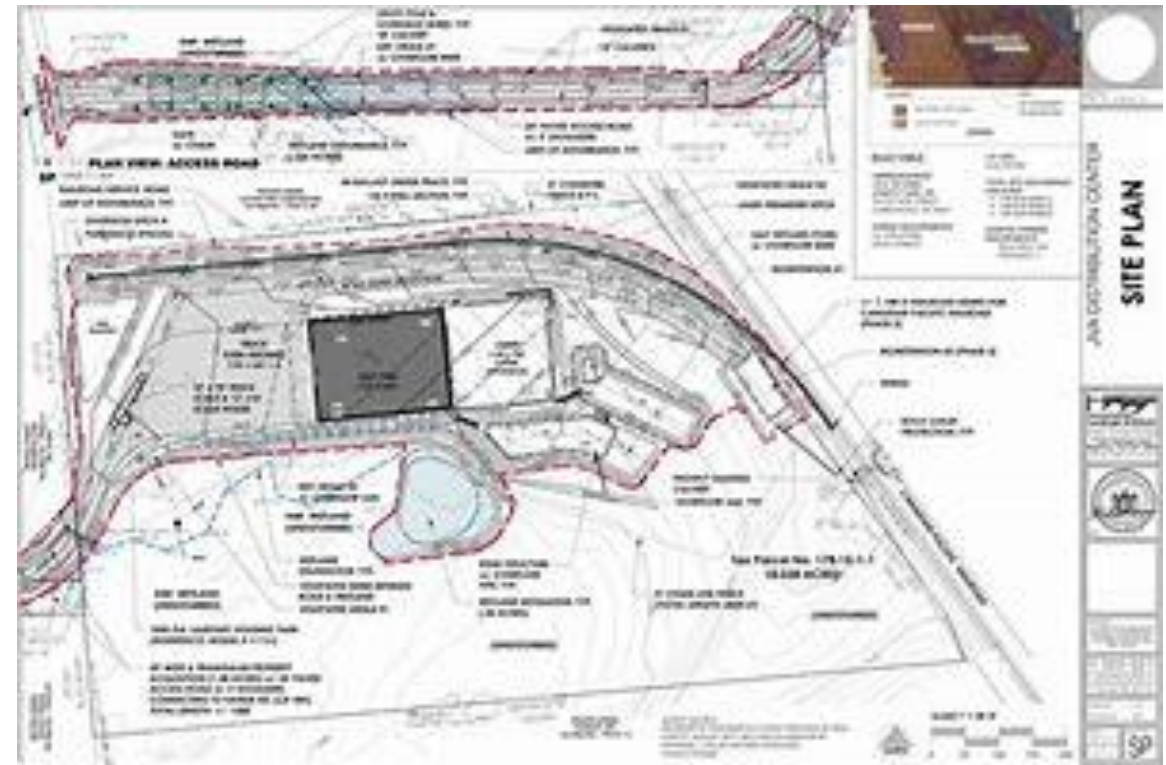
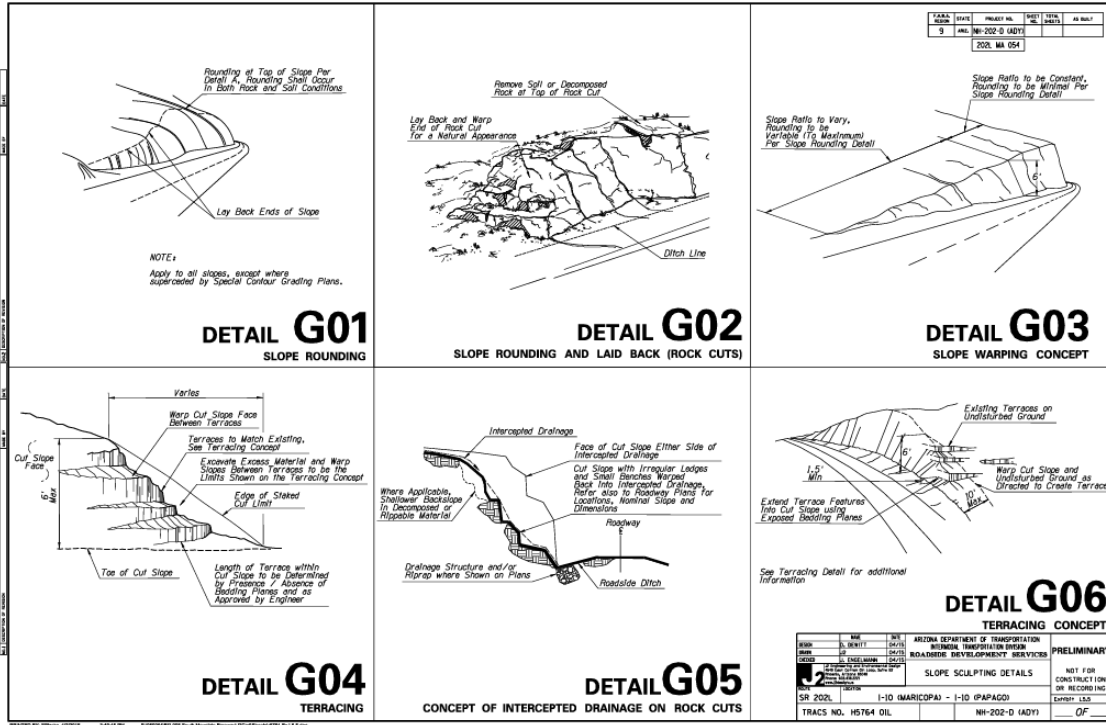
# Pollution Prevention Plans

## Runoff Path

- Municipal streets
- Master planned community
- Wash or river
- Basin

## Minimize Pollutants

- Limit exposure
- Perimeter control
- Schedule
- Clean up



Is this a SWPPP?

# Oversight, Implementation, Updates



Inspect

Document

Revise

Report



# Oversight/SWPPP Management

- Inspect
  - Routine
  - Rain event
  - Complaint



# Oversight/SWPPP Management

- Document
  - Use a form
  - Sign the form
  - Retain the form





# Oversight/SWPPP Management

- Revise
  - Update the SWPPP
  - Line through and date
  - Fill in the revision log
  - Communicate the change



# Oversight/SWPPP Management

- Report
  - Exceedances
  - Corrective Actions
  - Submit sampling forms, if applicable



Oversight/SWPPP Management

**WHO DOES THIS?**



# Control Measures

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**SCHEDULING**

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**HOUSEKEEPING**

---

**CONTROLLING EROSION**

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**CONTROLLING SEDIMENT**

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**TRAINING**

# Control Measures

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SCHEDULING

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Waive coverage

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Plan around monsoon

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Complete stabilization ASAP

# SCHEDULING

Control Measures

		August														September							
		Week 1							Week 2							Week 3							
Activity		Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	
		27	28	29	30	31	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
<b>3 WEEK SCHEDULE MEETING</b>		ALL																					
<b>SURVEY</b>																							
SLOPE STAKES	AH																						
CLEARING ROPE	AH																						
REYMENT STAKES	AH																						
QUEEN CREEK STAKES	AH																						
STR EXC STAKES	AH																						
PIPE STAKES	AH																						
RIGHT OF WAY	AH																						
GASLINE	AH																						
SET CONTROL	AH																						
<b>SVPPP</b>																							
PIPE	PR																						
DRAINAGE	PR																						
CLEARING WALKS	PR																						
<b>QUALITY CONTROL</b>																							
WEEKLY QUALITY REPORTS	RA																						
PIPE SUBGRADE	RA																						
BOX SUBGRADE	RA																						
CONCRETE	RA																						
ROADWAY COMPACTION	RA																						
<b>RIGHT OF WAY FENCE</b>																							
PHASE 1	CH2																						
<b>BECON</b>																							
REMOVE LARGE CACTUS	CK																						
MAINTAIN NURSERY	CK																						
<b>PIONEER</b>																							
PIONEER	TS																						
STRIP TOPSOIL / CLEAR & GRUB	TS																						
BOX EXC	TS																						
PIPE ACCESS	TS																						
SCRAPERS	TS																						
GAS LINE EXC	TS																						
<b>EPNG</b>																							
INSTALL GAS LINE																							

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## Control Measures

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### HOUSEKEEPING

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Keep the site clean

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Clean up spills

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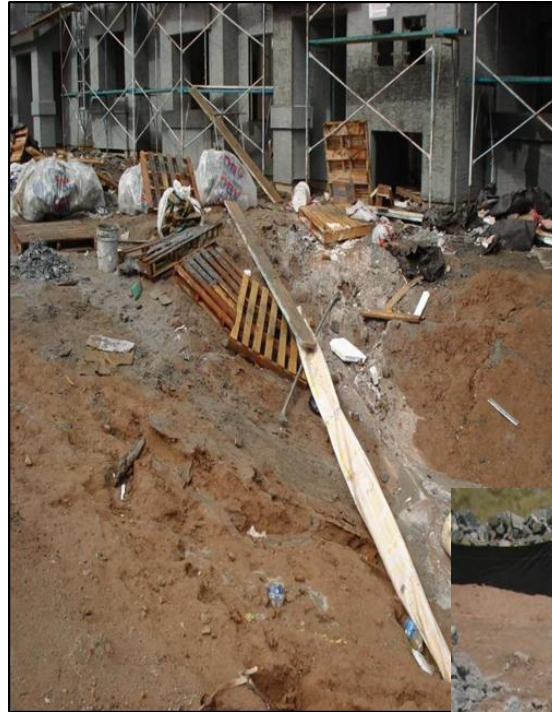
Use secondary containment

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Elevate product on pallets

# HOUSEKEEPING

Control  
Measures





# Control Measures

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EROSION CONTROL

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Minimize exposure

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Manage flow volume

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Dampen flow velocity

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Prevent run-on

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# EROSION CONTROL

Control  
Measures



## Control Measures

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### SEDIMENT CONTROL

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Install basins and traps

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Deploy silt fence or wattle

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Use check dams

---

Utilize flocculants

---

# SEDIMENT CONTROL



Control  
Measures

# Control Measures

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TRAINING

---

You're here!

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Qualified to know

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Local opportunities

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# TRAINING

Control  
Measures



# BMPs

Wattle

Silt fence

Check Dam

Seeding

Blankets or Mulch

Basin or Trap

Flocculants

Mechanical Separation Device

BMPs

Wattle



# Wattle

Install on contour

Embed

Stake

Maintain



BMPs

Silt Fence

# Silt Fence

Trench

Mesh side contact

Ends overlap

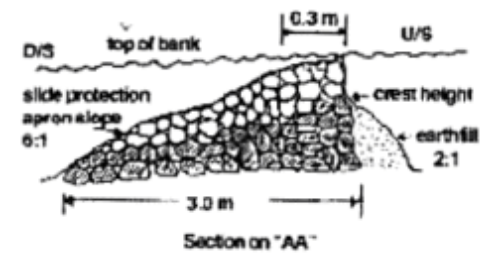
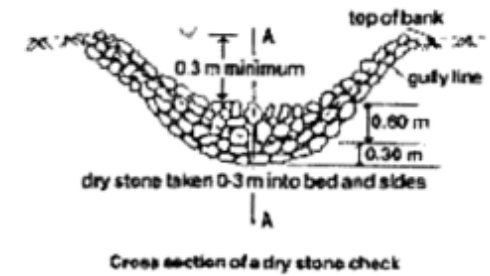
Maintain



BMPs

Check Dam

Check Dam  
Angular rock  
Side slopes  
Weir  
Maintain



BMPs

Seeding

# Seeding

Mobilization

Complete cover

Establishment

Final Stabilization



BMPs

Blanket/Mulch



# Blankets/Mulch

Protects underlying soil

Complete cover

Maintain



BMPs

Basin/Trap

# Basins/Traps

Store runoff

Settle sediment

Temporary or permanent

Maintain



BMPs

Flocculants

# Flocculants

Adhere to particle

Settle sediment

Must disclose in SWPPP

Not common in Az for stormwater application



BMPs

# Mechanical Separation Device

# Mechanical Device

More than average use

Permanent control

Underground

# Used for post-construction stormwater runoff

(if one of these is in the plans, include in SWPPP; after construction complete, clean out, turn over to owner!)



# Good, Bad, Ugly





# Good, Bad, Ugly



# Good, Bad, Ugly



# Good, Bad, Ugly



# Good, Bad, Ugly

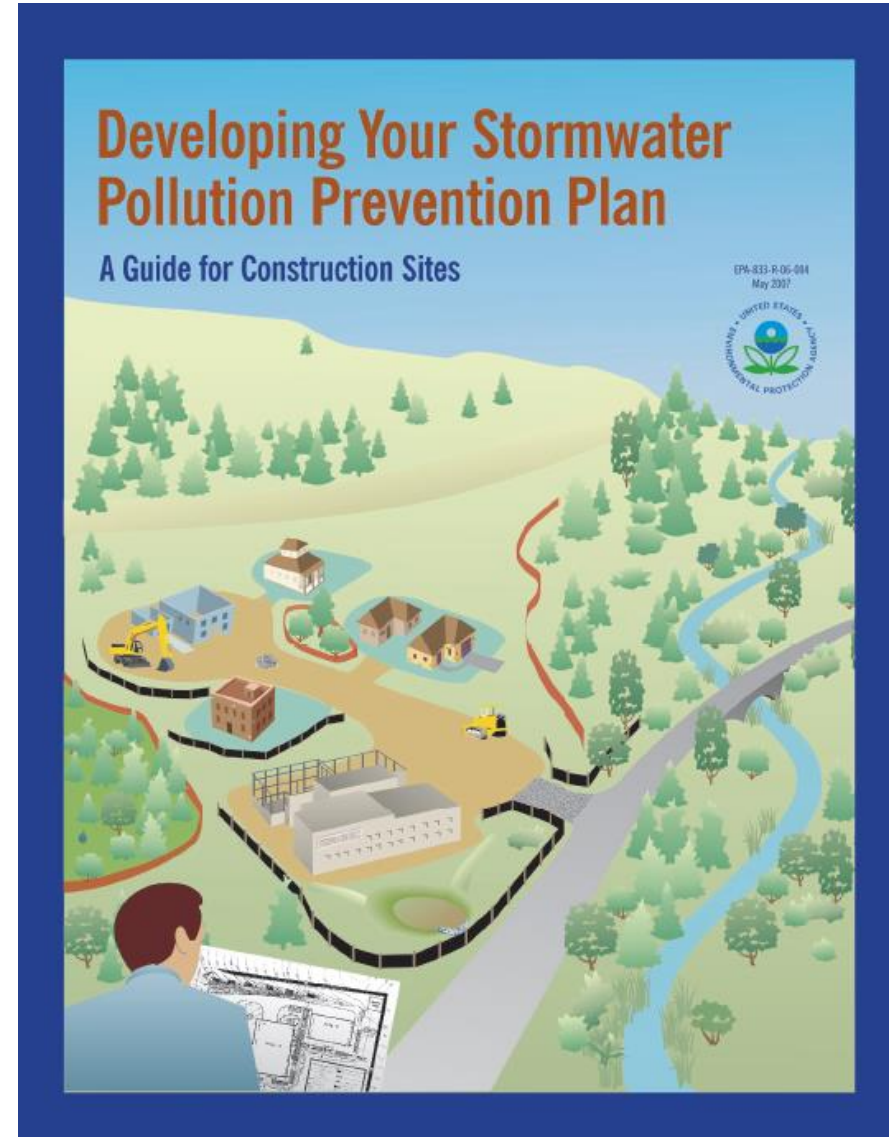


# Good, Bad, Ugly



USEPA 2017

Guide to develop a  
construction SWPPP



# Closing and Survey

Thank

Thank you for attending!

Visit

Visit [www.azstorm.org](http://www.azstorm.org)

Provide

Provide input via paper (today!)

Contact

Contact [storm.arizona@gmail.com](mailto:storm.arizona@gmail.com)