SWPPP’s... Pre-construction and Planning Phase

Presented by ... Kevin Stumpff
Quick Show of Hands...

How many of you have responsibilities that included Dust and SWPPP?

How many of you are the “Go To” person in your company for compliance for SWPPP?

How Many of you **LOVE** SWPPP compliance?
What's Not to Love???

- Who doesn't like to spend Money?
- Paperwork!
- Time Consuming!
- Seems like a great program for a Desert, right?
- Fear!

Monday, June 6, 2011
A Little About Me

Kevin Stumpff - President - Co-Founder

15 Years experience in Enterprise Level Information Technology and 10 Years in C-Level Business Management and Business Culture Change

What??? Why is this guy talking about SWPPP???

Entered the SWPPP Market in 2003

Early days of Phase II of the Clean Water Act

Performed SWPPP Implementation and Installation as a subcontractor.

Over the next seven years .....
Over the next Seven Years, through problems we identified in the sub-contracting of SWPPP, we identified many issues “Procedurally” with how SWPPP was handled.

In March of 2010, we discontinued sub-contracting and founded Cloud Resources, LLC to focus on these issues specifically.
Cloud Resources works with Regional and National General Contractors as well as Owner/Developer Groups who are in the position of having to comply with Phase II of the Clean Water Act.

We specialize in Enterprise Level Environmental Program Development.

We have developed proprietary systems that help companies identify weaknesses, set courses for improvement, and continuously monitor their SWPPP program.

How good is your Safety program? How do you know?

Measurements, Ratings, EMOD, Trainings, Etc....

How good is your SWPPP program? How do you know?
What's This Preso About???

- We do a lot of Assessments....The vast majority of projects we see, go something like this.....

  - Owner/Developer has a desired goal or purpose for a project.

  - Architect designs the project to meet these goals while complying with P&Z and applicable building codes.

  - Somewhere along the way, the civil work is completed and usually a SWPPP Map Exhibit Sheet is created and attached to the civil designs.

  - In many cases, this is enough to suffice P&Z.
More about the typical process...

- The project is now sent out for bid.
- Estimators calculate SWPPP quantities to either be performed internally or subcontracted.
- Contractors submit bids.
- Project is awarded.
- Project responsibilities are assigned internally for implementation.
- Onsite Construction Process Begins....etc.
So...The Big Question...

What part of this process is "Broken?"
...The Answer...

It's "Broken" All Over the Place!!!
It’s Not Your Fault!

Because there are actual materials, labor, etc. for SWPPP, it has fallen into the standard contracting system.

Now that you know, we can target your internal processes to ensure you have a compliant SWPPP prior to construction.
False Sense of Compliance....
Thanks ADEQ!
16 out of 57
28.07% Compliant
Jurisdictional Issues...

- Federal Regulations / EPA
- State Regulations
- County Requirements
- City and town Requirements

Owners, developers, contractors
Real Life Example...

Developers, General Contractors and Home Builders must navigate through layers of storm water (26 jurisdictions).

**Federal Regulations / EPA**
- Regions: 9, 10, 4

**State Regulations**
- Arizona Department of Environmental Quality, California Water Board
- Regions (3, 5, 7, 8), Florida Department of Environmental Protection,
- Washington Department of Ecology

**County Requirements**
- Pinal, Maricopa, King, Thurston, Riverside, San Luis Obispo, Volusia, Solano, Contra

**City and Town Requirements**
- Deland, Queen Creek, Redmond, Lacey, Rio Vista, Brentwood, Nipomo, Glen Ivy, La Quinta, Peoria

**SWPPP Policy**
So Now What???
From 30,000 Ft...

It’s time to change the mindset from Project Based to Program Based.

Employ either full time employees or consultants who not only understand SWPPP compliance, but also enterprise culture change and program implementation.
Set Enterprise Compliance Goals...

- Set Quantifiable Compliance Goals which means you need a way to measure compliance.
- Implement technology and eliminate “Data Silos”
- Engage agents of your company (employees, subcontractors, etc.) in classroom and onsite training.
- These steps, although challenging, will allow you to measure and continually improve your compliance. (Reduced Risk, Cost Savings, Etc)
From a Project Perspective...

Ensure that you are provided with a SWPPP Book not simply SWPPP Exhibits!!!

Identify all potential sources of pollution

Identify, describe and ensure the implementation of appropriate BMPs

Assure compliance with the terms and conditions of the AZPDES Permit.

Identify the responsible party for on-site SWPPP implementation.

Complete Scale and Legible SWPPP Exhibits that meet AZPDES requirements.
We’re gonna need some signatures?

- All Operators must sign and certify the SWPPP.
- Sub-Contractors are encouraged to sign the SWPPP.
- Designate and note the person responsible for implementation of the SWPPP.
- Designate and Note the person responsible for routine inspections.
- COMPLETE and SUBMIT the NOI Monday, June 6, 2011
Who Signs?

• Corporations – A responsible corporate officer (president, vice president, etc.) someone in charge of a principal business function of the corporation ... Or
• Manager of the facility, branch or operation (authorized to make major capital investment recommendations)
• Partnerships or sole proprietorships – A general partner or owner
• Municipalities – Principal officer, elected official or executive officers
You need to Plan for Both Erosion and Sediment Control.
Erosion Control

Erosion occurs when soil particles are displaced by raindrops, moving water, or wind.

Erosion Controls either minimize, protect, or prevent the soil particles from detaching and begin moving.
Sediment Control

Once the soil particles enter water or wind systems, sediment controls are used to control the amount of sediment is transported.
Erosion Control
BMPS

- Phasing Construction Activities
- Preservation of Vegetative Buffers and Protecting Sensitive Areas
- ECMs and TRMs
- Temporary mulching / soil stabilizers
- Temporary / Permanent Seeding and Landscaping
Sediment Control
BMPs

- Stabilized Construction Exit
- Perimeter Sediment Control BMPs (one line)
- Storm drain inlets protection BMPs
- On-site dry well inlet protection BMPs
- Concrete, Paint, Stucco Washouts
Velocity Control

- Rip Rap
- Swales
- Check Dams
Structural vs. Non-Structural BMPS
Non-Structural BMPS

- Routine Inspections and Maintenance
- Good Housekeeping
- Training
- Project Phasing
- Etc.
Other Important Issues...

- Section 404 Waterways - “Navigable” waterways of the US. Includes ephemeral washes and tributaries of US Waterways.
- Section 303 - Impaired Waterways - Special Regulations Apply
- Section 401 - Unique Waterways - Special Regulations Apply
- Endangered Species - Special Regulations Apply
Questions?

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