Construction
Stormwater Permits
How to Comply?
How to Comply with Construction Stormwater Permits:

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

<table>
<thead>
<tr>
<th>Area of Modification</th>
<th>Existing Permit</th>
<th>Proposed New Permit</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Overall</strong></td>
<td>Too long, redundant explanations/details (40 pages)</td>
<td>Less redundancy, clearer explanations (23 pages)</td>
</tr>
<tr>
<td><strong>Erosivity Waiver</strong></td>
<td>Provides calculation methods and requirements for</td>
<td>myDeq does the calculation and if applicable, offers this</td>
</tr>
<tr>
<td></td>
<td>applicability</td>
<td>option to the permittee at the time of NOI submission</td>
</tr>
<tr>
<td><strong>Responsibilities of Operators</strong></td>
<td>Multiple operators were allowed to submit for coverage.</td>
<td>The owner of the project is considered the permittee</td>
</tr>
<tr>
<td></td>
<td>In some instances, this allowed for compliance issues as there was no &quot;one&quot; responsible party.</td>
<td></td>
</tr>
<tr>
<td><strong>Submission of NOI</strong></td>
<td>Information including name, project type, etc.</td>
<td>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</td>
</tr>
<tr>
<td><strong>ADEQ Acceptance of NOI with no Discharge to an Impaired/OAW</strong></td>
<td>Human review, typically 1-2 days</td>
<td>myDEQ review automatic</td>
</tr>
<tr>
<td><strong>ADEQ Acceptance of NOI with Discharge to an Impaired/OAW</strong></td>
<td>Human review + SWPPP review, typically 7-15 days</td>
<td>myDEQ review + human review of SWPPP, same time frame</td>
</tr>
<tr>
<td><strong>Not-attaining Waters</strong></td>
<td>Not specifically addressed</td>
<td>Added to all references of Impaired/OAW as applicable</td>
</tr>
<tr>
<td><strong>Requirement to Post Notice of Permit Coverage</strong></td>
<td>Line item in SWPPP section</td>
<td>Moved up and given its own section</td>
</tr>
<tr>
<td><strong>Termination of Coverage</strong></td>
<td></td>
<td>Minor changes related to myDEQ</td>
</tr>
<tr>
<td><strong>Effluent Limitations and SWQS</strong></td>
<td>(12) pages of control measures with redundant detail</td>
<td>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.</td>
</tr>
<tr>
<td><strong>Routine Inspections</strong></td>
<td>Every 7 days</td>
<td>Every 14 days</td>
</tr>
<tr>
<td><strong>Stormwater Monitoring</strong></td>
<td>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.</td>
<td>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.</td>
</tr>
</tbody>
</table>
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 access to each of their company by adding one or more Delegated Responsible Officers (DROs) to their myDEQ account.

Delegated Responsible Officer (DRO)
A DRO acts on the behalf of the Responsible Corporate Officer (RCO) and oversees all myDEQ account activities. The RCO receives email notification of all activities certified by the DRO and assumes all responsibilities for all tasks 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/registration and renewal applications for the RCO and/or DRO to review and submit to ADEQ. myDEQ can also prepare compliance reporting data for the Submitter, DRO, or RCO to submit to ADEQ.
Common Plan of Development

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 Shaze International, a luxury brand in China.
Opting Out

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

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LS7@azdeq.gov
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](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

- SCHEDULING
- HOUSEKEEPING
- CONTROLLING EROSION
- CONTROLLING SEDIMENT
- TRAINING
Control Measures

SCHEDULING

Waive coverage

Plan around monsoon

Complete stabilization ASAP
### Control Measures

#### SCHEDULING

![Scheduling Chart]

**Activity**: Various construction activities including:
- **Activity 1**: Description A
- **Activity 2**: Description B
- **Activity 3**: Description C

**Dates**:
- **Week 1**: Dates 1-5
- **Week 2**: Dates 6-10
- **Week 3**: Dates 11-15

**Groups**: A, B, C

**Notes**:
- Table includes dates for each activity across different weeks.
- Specific dates marked with different colors or symbols.
Control Measures

- HOUSEKEEPING
  - Keep the site clean
  - Clean up spills
  - Use secondary containment
  - Elevate product on pallets
Control Measures
Control Measures

EROSION CONTROL

Minimize exposure

Manage flow volume

Dampen flow velocity

Prevent run-on
EROSION CONTROL

Control Measures
Control Measures

SEDIMENT CONTROL

- Install basins and traps
- Deploy silt fence or wattle
- Use check dams
- Utilize flocculants
SEDIMENT CONTROL

Control Measures
Control
Measures

TRAINING

You’re here!

Qualified to know

Local opportunities
Control Measures
<table>
<thead>
<tr>
<th>BMPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wattle</td>
</tr>
<tr>
<td>Silt fence</td>
</tr>
<tr>
<td>Check Dam</td>
</tr>
<tr>
<td>Seeding</td>
</tr>
<tr>
<td>Blankets or Mulch</td>
</tr>
<tr>
<td>Basin or Trap</td>
</tr>
<tr>
<td>Flocculants</td>
</tr>
<tr>
<td>Mechanical Separation Device</td>
</tr>
</tbody>
</table>
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
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
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
Guide to develop a construction SWPPP
Closing and Survey

- **Thank** Thank you for attending!
- **Visit** Visit www.azstorm.org
- **Provide** Provide input via paper (today!)
- **Contact** Contact storm.arizona@gmail.com