

Module 4: Construction Inspection Strategies

4a. Overview.....	3
4b. Pre-Inspection Preparation.....	4
4c. Site Entry.....	5
Site entry	5
Site entry best practices	5
What to do if denied entry	6
4d. Posting Requirements and SWPPP Review	7
Public notification.....	7
SWPPP.....	7
SWPPP availability.....	7
SWPPP contents	8
SWPPP amendments, modifications, and updates	13
SWPPP inspections	15
Corrective actions	18
4e. Site Inspection	20
ESC practices.....	20
Perimeter controls	21
Soil stabilization	22
Slope protection	23
Inlets, outlets and channels	23
Working in watercourses.....	24
Pollution prevention measures.....	25
Prohibited discharges	25
Pollution prevention practices and procedures	26
support activities	28
4f. Inspection Report.....	29

Objectives

- List the posting requirements for the main entrance to the construction site.
- Explain the different SWPPP documentation requirements for projects under one acre and projects one acre or greater.
- List the plans that must be included in the SWPPP.
- Compare the inspection frequency for qualified personnel at sites discharging to impaired waters, waterways with an assigned TMDL, or exceptional waterways versus all other sites.
- Describe indicators of improperly functioning perimeter controls.
- Recall soil stabilization requirements.
- List slope protection requirements.
- List inlet protection and channel stabilization requirements.
- Identify pollution prevention measures that meet the requirements of the Construction General Permit.

4a. Overview

As the VSMP inspector, it is important that you have a thorough understanding of the Construction GP because it is your responsibility to document incidents of noncompliance.

This module will cover construction site inspections, which can be thought of as a process that typically consists of the following components:



4b. Pre-Inspection Preparation

Before leaving the office, review available documents:

- Permit(s)
- Previous compliance inspection reports, other enforcement actions
- Complaints

Also make sure to pack equipment and essentials, including:

- Copies of inspection forms and any developed checklists
- Logbook for taking other notes
- Digital camera with time/date stamp turned on
- Inspection credentials/identification
- Safety equipment

Helpful Hint!

Carry copies of the EPA Concrete Washout Fact Sheet to give to operators whose concrete washout facilities do not meet the Construction GP requirements (9VAC25-870 Part II A 4 e5) www.epa.gov/npdes/pubs/concretewashout.pdf

The graphic is a fact sheet titled "Stormwater Best Management Practice Concrete Washout". It features the EPA logo on the left and the NPDES logo on the right. The title "Concrete Washout" is in large, bold, yellow letters. Below the title, there are sections for "Minimum Measure", "Subcategory", and "Description of Concrete Washout at Construction Sites". The "Minimum Measure" section lists "Construction Site Stormwater Runoff Control". The "Subcategory" section lists "Good Housekeeping/Materials Management". The "Description" section explains that construction workers should handle wet concrete and washout water with care to prevent skin irritation and eye damage, and that washwater should not be dumped on the ground as it can run off to roads and storm drains, eventually entering surface waters. A red arrow in Figure 2 (not shown) points to a ready mixed truck chute that's being washed out into a roll-off bin, which isn't watertight. Leaking washwater, shown in the foreground, will likely follow similar paths.

EPA
United States
Environmental Protection
Agency

Stormwater Best Management Practice

Concrete Washout

Permits for Clean Water
NPDES

Minimum Measure
Construction Site Stormwater Runoff Control

Subcategory
Good Housekeeping/Materials Management

Description of Concrete Washout at Construction Sites

Construction workers should handle wet concrete and washout water with care because it may cause skin irritation and eye damage. If the washwater is dumped on the ground (Fig. 1), it can run off the construction site to adjoining roads and enter roadside storm drains, which discharge to surface waters such as rivers, lakes, or estuaries. The red arrow in Figure 2 points to a ready mixed truck chute that's being washed out into a roll-off bin, which isn't watertight. Leaking washwater, shown in the foreground, will likely follow similar

4c. Site Entry

SITE ENTRY

(§62.1-44.15:39)

The Act authorizes DEQ, a VSMP authority, or a MS4 authority to, at reasonable times and under reasonable circumstances, enter establishments or properties for the purpose of obtaining information, conducting surveys or investigations necessary to enforce the Act.

In accordance with a performance bond with surety, cash escrow, letter of credit, any combination thereof, or such other legal arrangement, a VSMP authority may also enter any establishment or upon any property for the purpose of initiating or maintaining appropriate actions that are required by the Construction GP when a permittee, after proper notice, has failed to take acceptable action within the time specified.

Consent may be granted in advance or when the inspector arrives at the site. If there is an imminent threat to public health or the environment, more immediate actions may be required including notification to other local, state, or federal authorities.

Site entry best practices

- Enter through the main entrance or any other agreed upon access point
- Upon arrival, request to see the permit holder or person in charge if not previously arranged
- Document names of all persons that are met during the course of the inspection
- Provide credentials/identification
- Be prepared to provide authority for inspection
- Notify person in charge of the inspection
- Inquire about any specific onsite safety issues or requirements

- Explain the purpose of the inspection and provide an overview of the inspection process (e.g., review of documents, tour of the site, exit interview, report preparation and delivery, and any potential follow-up requirements)
- Use clear language
- Ask one question at a time and wait for responses
- Write down responses
- Repeat or rephrase responses to verify information provided
- Listen carefully and actively
- Use acknowledgements or pauses to prompt responses – do not fill in the blanks
- Do not include the answer in a posed question
- Conclude interview/discussion by summarizing and verifying important details

What to do if denied entry

If access is refused, inspectors should remain calm, professional and courteous. Explain that the right of entry for inspections, surveys or investigations is provided under the authority of the Act (§ 62.1-44.15:39). Then, obtain and document reasons for entry denial (accurate portrayal of their reasons is critical). If possible, determine underlying concerns and mitigate with a thorough explanation (worries may be unfounded and a calm and courteous approach may greatly assist in lessening concerns). If site entry is still not granted, leave and seek access through other means (e.g., obtain inspection warrant).

4d. Posting Requirements and SWPPP Review

PUBLIC NOTIFICATION

(9VAC25-880-70 Part II C)

When you arrive at a site, look for a copy of the notice of coverage letter near the main entrance of the construction activity. For linear projects, the operator must post the notice of coverage letter at a publicly accessible location near an active part of the construction project (e.g., where a pipeline crosses a public road). The operator must keep a copy of the notice of coverage letter posted until the Construction GP is terminated.

SWPPP

SWPPP availability

(9VAC25-880-70 Part II D)

Construction site personnel: The SWPPP, including copies of the signed registration statement, notice of coverage letter, and permit, must be available at a central location on-site for use by those identified as having responsibilities under the SWPPP whenever they are on the construction site.

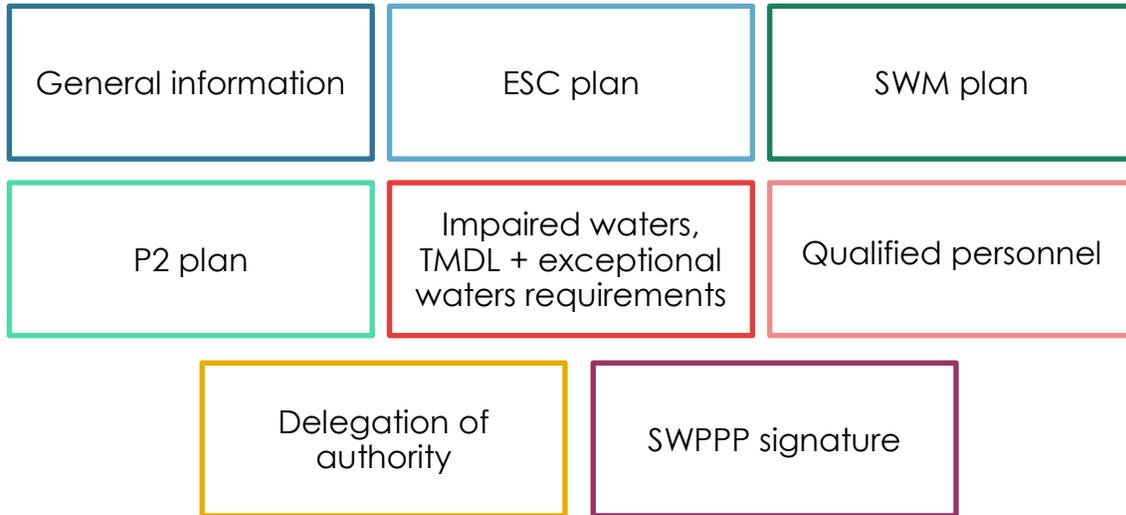
DEQ, VSMP/VESCP authority, EPA, MS4 operator, local government: The SWPPP must be available upon request. If an on-site location is unavailable when personnel not present, notice of SWPPP location must be posted near main entrance of construction site.

Public: The SWPPP must be available for public review in an electronic format or in hard copy. Information for public access must be posted near the main entrance of the construction site. If SWPPP is not provided electronically, public access to SWPPP may be arranged upon request at a time and location convenient to the operator.

SWPPP contents

(9VAC25-880-70 Part II A)

The following information must be included in the SWPPP during construction:



1. General information

- Signed copy of the registration statement, if required
- Copy of the notice of coverage letter
- Copy of the Construction GP
- Narrative description of the nature of the construction activity, including the function of the project (e.g., low density residential, shopping mall, highway, etc.)
- Legible site plan identifying:
 1. Directions of stormwater flow and approximate slopes anticipated after major grading activities;
 2. Limits of land disturbance including steep slopes and natural buffers around surface waters that will not be disturbed;
 3. Locations of major structural and nonstructural control measures, including sediment basins and traps, perimeter dikes, sediment barriers, and other measures intended to filter, settle, or similarly treat sediment, that will be

installed between disturbed areas and the undisturbed vegetated areas in order to increase sediment removal and maximize stormwater infiltration;

4. Locations of surface waters;
5. Locations where concentrated stormwater is discharged;
6. Locations of support activities, when applicable and when required by the VSMP authority, including but not limited to (i) areas where equipment and vehicle washing, wheel wash water, and other wash water is to occur; (ii) storage areas for chemicals such as acids, fuels, fertilizers, and other lawn care chemicals; (iii) concrete wash out areas; (iv) vehicle fueling and maintenance areas; (v) sanitary waste facilities, including those temporarily placed on the construction site; and (vi) construction waste storage; and
7. When applicable, the location of the on-site rain gauge or the methodology established in consultation with the VSMP authority used to identify measurable storm events for inspection purposes.

2. Erosion and sediment control plan

- Approved ESC plan, “agreement in lieu of a plan”, or ESC plan developed in accordance with DEQ approved annual standards and specifications. All ESC plans must include a statement describing the maintenance responsibilities required for the erosion and sediment controls used.

3. Stormwater management plan

- New construction – approved SWM plan, “agreement in lieu of a plan” (DEQ template included at the end of this module), or SWM plan developed in accordance with DEQ approved annual standards and specifications
- Existing construction – description of, and all necessary calculations supporting, all post-construction stormwater management measures

4. Pollution prevention plan

- Identifies potential pollutant-generating activities and the pollutant that is expected to be exposed to stormwater

- Describes the location where the potential pollutant-generating activities will occur, or if identified on the site plan, reference the site plan
- Identifies all nonstormwater discharges, as authorized in 9VAC25-880-70 Part I E, that are or will be commingled with stormwater discharges from the construction activity, including any applicable support activity
- Identifies the person responsible for implementing the pollution prevention practice or practices for each pollutant-generating activity if other than the person listed as the qualified personnel
- Describes the pollution prevention practices and procedures that will be implemented to:
 1. **Prevent and respond** to leaks, spills, and other releases including (i) procedures for expeditiously stopping, containing, and cleaning up spills, leaks, and other releases; and (ii) procedures for reporting leaks, spills, and other releases in accordance with Part III G
 2. **Prevent** the discharge of spilled and leaked fuels and chemicals from vehicle fueling and maintenance activities (e.g., providing secondary containment such as spill berms, decks, spill containment pallets, providing cover where appropriate, and having spill kits readily available)
 3. **Prevent** the discharge of soaps, solvents, detergents, and wash water from construction materials, including the clean-up of stucco, paint, form release oils, and curing compounds (e.g., providing (i) cover (e.g., plastic sheeting or temporary roofs) to prevent contact with stormwater; (ii) collection and proper disposal in a manner to prevent contact with stormwater; and (iii) a similarly effective means designed to prevent discharge of these pollutants)
 4. **Minimize** the discharge of pollutants from vehicle and equipment washing, wheel wash water, and other types of washing (e.g., locating activities away from surface waters and stormwater inlets or conveyance and directing wash waters to sediment basins or traps, using filtration devices such as filter bags or sand filters, or using similarly effective controls)

5. ***Direct*** concrete wash water into a leak-proof container or leak-proof settling basin. The container or basin shall be designed so that no overflows can occur due to inadequate sizing or precipitation. Hardened concrete wastes shall be removed and disposed of in a manner consistent with the handling of other construction wastes. Liquid concrete wastes shall be removed and disposed of in a manner consistent with the handling of other construction wash waters and shall not be discharged to surface waters
6. ***Minimize*** the discharge of pollutants from storage, handling, and disposal of construction products, materials, and wastes including (i) building products such as asphalt sealants, copper flashing, roofing materials, adhesives, and concrete admixtures; (ii) pesticides, herbicides, insecticides, fertilizers, and landscape materials; and (iii) construction and domestic wastes such as packaging materials, scrap construction materials, masonry products, timber, pipe and electrical cuttings, plastics, Styrofoam, concrete, and other trash or building materials
7. ***Prevent*** the discharge of fuels, oils, and other petroleum products, hazardous or toxic wastes, and sanitary wastes
8. Address any other discharge from the potential pollutant-generating activities not addressed above

- Describes procedures for providing pollution prevention awareness of all applicable wastes, including any wash water, disposal practices, and applicable disposal locations of such wastes, to personnel in order to comply with the conditions of this general permit.

5. SWPPP requirements for discharges to impaired waters, surface waters with an applicable TMDL wasteload allocation and exceptional waters

- Identifies the impaired water(s), approved TMDL(s), pollutant(s) of concern, and exceptional waters, when applicable
- Provides clear direction that:
1. Permanent or temporary soil stabilization must be applied to denuded areas within ***seven days after final grade is reached on any portion of the site***

2. Nutrients must be applied in accordance with manufacturer's recommendations or an approved nutrient management plan and must not be applied during rainfall events
3. A modified inspection schedule shall be implemented in accordance with Part I B 4 or Part I B 5 (discussed below in SWPPP inspections)

6. Qualified personnel

- Lists the name, phone number, and qualifications of the qualified personnel conducting inspections

7. Delegation of authority

- Lists the individuals or positions with delegated authority, in accordance with 9VAC25-880-70 Part III K, to sign inspection reports or modify the SWPPP

8. SWPPP signature

- Signed and dated by operator or duly authorized representative of operator with the following certification (9VAC25-880-70 Part III K 4):

"I certify under penalty of law that I have read and understand this document and that this document and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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."

Note:

The SWPPP requirements may be fulfilled by incorporating by reference other plans such as a spill prevention control and countermeasure (SPCC) plan developed for the site under § 311 of the federal Clean Water Act or best management practices (BMP) programs otherwise required for the facility provided that the incorporated plan meets or exceeds the SWPPP requirements of Part II A. All plans incorporated by reference into the SWPPP become enforceable under the Construction GP. If a plan incorporated by reference does not contain all of the required elements of the SWPPP, the operator must develop the missing elements and include them in

the SWPPP.

Existing projects have **60 days** after the date of coverage under the current Construction GP to update their stormwater pollution prevention plan to comply with the above requirements.

SWPPP amendments, modifications, and updates

(9VAC25-880-70 Part II B)

The Construction GP tells the operator when the SWPPP has to be amended, modified and updated. As an inspector, you should look to see if the following requirements are being followed and if not, make note on your inspection report.

Amendments

The SWPPP must be amended if:

- There is a change in the design, construction, operation, or maintenance that has a significant effect on the discharge of pollutants to surface waters and that has not been previously addressed in the SWPPP.
- Inspections or investigations by the qualified personnel, or by local, state, or federal officials, determined that the existing control measures are ineffective in minimizing pollutants in discharges from the construction activity.

Revisions to the SWPPP shall include additional or modified control measures designed and implemented to correct problems identified. If approval by the VESCP authority, VSMP authority, or department is necessary for the control measure, revisions to the SWPPP shall be completed no later than ***seven calendar days following approval***.

Implementation of these additional or modified control measures must be accomplished as described in Part II G.

- There is a new contractor that will implement and maintain a control measure.

Modifications and updates

The operator must update the SWPPP no later than ***seven days*** following any modification to its implementation. All modifications or updates to the SWPPP shall be noted and shall include the following items:

- A record of dates when:

1. Major grading activities occur
 2. Construction activities temporarily or permanently cease on a portion of the site
 3. Stabilization measures are initiated
- Documentation of replaced or modified controls where periodic inspections or other information have indicated that the controls have been used inappropriately or incorrectly and where modified as soon as possible;
 - Areas that have reached final stabilization and where no further SWPPP or inspection requirements apply;
 - All properties that are no longer under the legal control of the operator and the dates on which the operator no longer had legal control over each property;
 - The date of any prohibited discharges, the discharge volume released, and what actions were taken to minimize the impact of the release;
 - Measures taken to prevent the reoccurrence of any prohibited discharge; and
 - Measures taken to address any evidence identified as a result of a qualified person's SWPPP inspection

Amendments, modifications, or updates to the SWPPP shall be signed and dated by the operator or duly authorized representative of operator.

NOTE:

(9VAC25-880-70 Part III G)

Any operator who discharges or causes or allows a discharge of sewage, industrial waste, other waste or any noxious or deleterious substance or a hazardous substance or oil into or upon surface waters or that may reasonably be expected to enter surface waters must notify DEQ immediately upon discovery of the discharge, but in no case later than within 24 hours of discovery. A written report of the unauthorized discharge must be submitted to DEQ and the VSMP authority within five days of discovery.

A discharge of oil does not have to be reported if the discharge is less than 25 gallons, does not reach state waters, is cleaned up immediately and the recordkeeping requirements of § 62.1-44.34:19.2 have been satisfied.

SWPPP inspections

(9VAC25-880- 70 Part II F)

The qualified personnel are required to conduct SWPPP inspections of the site, including any on-site or off-site support activities, at a set frequency and they must record specific information in their inspection report. As the VSMP inspector, you should review the qualified personnel's inspection reports to see if they are done at the correct times and include the correct information.



Look for:

- SWPPP inspections completed at correct frequency
- SWPPP inspection requirements and documentation met

SWPPP inspection schedule

The qualified personnel must conduct inspections in accordance with the following:

<p>SWPPP inspection requirements for discharges to impaired waters, surface waters with an applicable TMDL wasteload allocation and exceptional waters</p> <p>(9VAC25-880-Part I 4 and 5)</p>	<p>SWPPP inspection requirements for sites discharging to waterways without limitations</p> <p>(9VAC25-880 Part II F)</p>
<ul style="list-style-type: none"> • Conducted at least once every four business days OR At least once every five business days and no later than 48 hours following a measurable storm event (If event occurs when there are more than 48 hours between business days, inspection must be conducted no later than the next business day) • Where areas have been temporarily stabilized or land-disturbing activities will be suspended due to continuous frozen ground conditions and stormwater discharges are unlikely, the inspection frequency may be reduced to once per month If weather conditions (such as above freezing temperatures or rain or snow events) make discharges likely, the operator shall immediately resume the regular inspection frequency • Representative inspections used by utility line installation, pipeline construction, or other similar linear construction activities must inspect all outfalls discharging to surface waters identified as impaired or for which a TMDL wasteload allocation has been established and approved prior to the term of this Construction GP 	<ul style="list-style-type: none"> • Conducted at least once every five business days OR • At least once every 10 business days and no later than 48 hours following a measurable storm event. (If the event occurs when there are more than 48 hours between business days, the inspection shall be conducted no later than the next business day) • Where areas have been temporarily stabilized or land-disturbing activities will be suspended due to continuous frozen ground conditions and stormwater discharges are unlikely, the inspection frequency may be reduced to once per month If weather conditions (such as above freezing temperatures or rain or snow events) make discharges likely, the operator shall immediately resume the regular inspection frequency • Representative inspections may be utilized for utility line installation, pipeline construction, or other similar linear construction activities

SWPPP inspection report

The qualified person's SWPPP inspection report must contain the following:

- The date and time of the inspection and when applicable, the date and rainfall amount of the last measurable storm event
- Summarized findings of the inspection
- The location(s) of prohibited discharges
- The location(s) of control measures that require maintenance
- The location(s) of control measures that failed to operate as designed or proved inadequate or inappropriate for a particular location;
- The location(s) of any evidence that the approved ESC plan, has not been properly implemented (Part II F 3 a (7));
- The location(s) where any additional control measure is needed that did not exist at the time of inspection;
- A list of corrective actions required (including any changes to the SWPPP that are necessary) as a result of the inspection or to maintain permit compliance;
- Documentation of any corrective actions required from a previous inspection that have not been implemented; and
- The date and signature of the qualified personnel and the operator or its duly authorized representative

Note (9VAC25-880-70 Part II F 4):

The inspection report must be retained by the operator as part of the SWPPP for at least **three years** from the date that general permit coverage expires or is terminated

Where an inspection report does not identify any incidents of noncompliance, the report shall contain a certification that the construction activity is in compliance with the SWPPP and the Construction GP. The report shall be signed by the operator or duly authorized representative making the following certification from 9VAC25-880-70 Part III K 4:

"I certify under penalty of law that I have read and understand this document and that this document and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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."

Corrective actions

The Construction GP requires the operator to implement the corrective action(s) identified as a result of an inspection **as soon as practicable but no later than seven days** after discovery or a longer period as approved by the VSMP authority. If approval of a corrective action by a regulatory authority (e.g., VSMP authority, VESCP authority, or the department) is necessary, additional control measures must be implemented to minimize pollutants in stormwater discharges until such approvals can be obtained.

Look for:



- Corrective actions being implemented
- Timeframe that corrective actions are implemented

The operator may be required to remove accumulated sediment deposits located outside of the construction activity covered by this general permit as soon as practicable in order to minimize environmental impacts. The operator shall notify the VSMP authority and the department as well as obtain all applicable federal, state, and local authorizations, approvals, and permits prior to the removal of sediments accumulated in surface waters including wetlands.

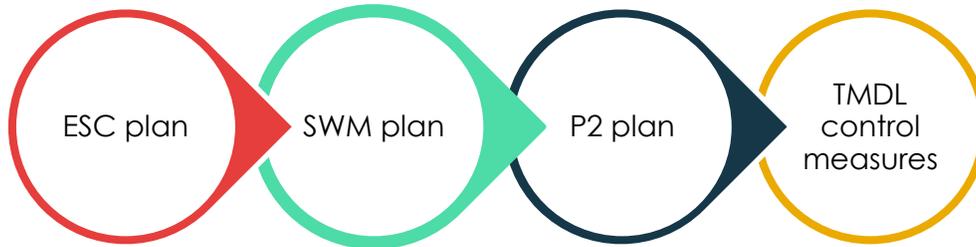
Note (9VAC25-880-70 Part III D):

The operator must, within a reasonable time, provide information to:

- The Board to determine if the operator's permit should be modified, revoked, or reissued, or to determine compliance
 - Board, DEQ, EPA VSMP authority to determine the effect of the waste from a discharge on the quality of surface waters, or compliance with the Clean Water Act and Stormwater Management Act
-

4e. Site Inspection

When it is time to walk the site, you will be looking for compliance with the approved ESC plan and SWM plan, the development, updating and implementation of the pollution prevention (P2) plan, and the development and implementation of any additional control measures necessary to address a TMDL.



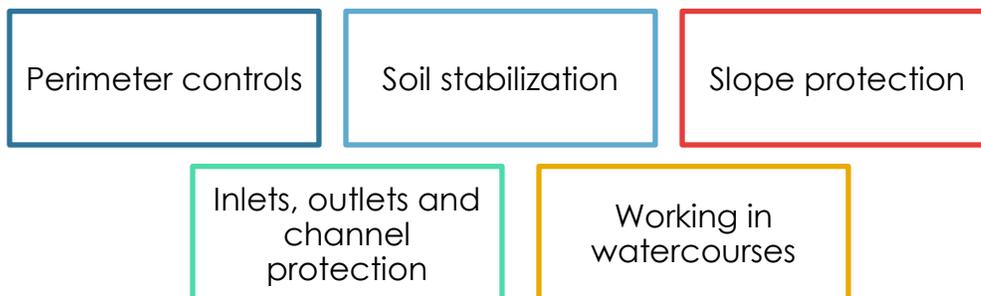
ESC PRACTICES

(9VAC25-880-70 Part II F 3)

The order, *erosion* then *sediment* control was chosen for a reason. Erosion control is often considered a first line of defense - if erosion is controlled then sediment control is not needed. Sediment control, the second line of defense, catches the sediment from areas where erosion controls could not be installed or where they failed to work properly.

The following section covers some of the more common ESC practices. For a more thorough discussion of the ESC plan and practices, please consider completing DEQ's Inspector for Erosion and Sediment Control Course:

<http://www.deq.virginia.gov/ConnectWithDEQ/TrainingCertification/ESCTraining.aspx>



Perimeter controls

Perimeter control practices keep sediment on the site and protect neighboring properties from the construction activity. Perimeter controls must be installed ***before*** upslope land disturbance occurs.

Silt fence

Silt fences are a perimeter control that is placed across or at the bottom of a slope to keep sediment from leaving the site.



- Properly installed and being maintained

Construction entrance

A construction entrance is a stabilized stone pad with a filter fabric underliner located at points where vehicles enter and leave a construction site. The entrance reduces the amount of sediment tracked onto paved roads.



- Construction vehicle access routes that intersect or access paved roads have minimum sediment tracking

Sediment trap

A sediment trap collects from areas that are less than 3 acres.



- Sediment basins and traps, perimeter dikes, sediment barriers and other sediment trapping measures from the ESC plan have been constructed before upslope land disturbance takes plan

Sediment basin

A sediment basin collects water and filter sediment from areas that are 3 acres or larger.



Soil stabilization

Soil stabilization is the most effective form of erosion control.

Stabilization of earthen structures

- Completed earthen structures, such as dams, dikes, ditches, and diversions are immediately stabilized



Stockpiles and borrow areas

- Soil stockpiles and borrow areas must be stabilized or protected with sediment trapping measures. This also applies to offsite areas.



Stabilization for dormant areas

- Temporary stabilization must be applied within seven days to bare areas that may not be at final grade but will remain dormant for longer than 14 days



Stabilization for areas at final grade

- Permanent or temporary soil stabilization must be applied to bare areas within seven days after final grade is reached on **any portion** of the site.



Slope protection

Slopes are very susceptible to erosion and therefore must be protected.

Cut and fill slopes

- Cut and fill slopes must be re-stabilized if found eroding within one year of permanent stabilization being added



Conveyance of stormwater down slopes

- To protect slopes from eroding, use a channel, flume, or slope drain to convey concentrated runoff down cut and fill slopes.



Inlets, outlets and channels

Sediment must be kept out of storm inlets. Outlets and channels must be protected to prevent erosion.

Inlets

- Storm inlets that have been made operable during construction must be protected so sediment will be filtered out before water enters.



Outlets and channels

- Outlets must be protected and channel lining must be installed before a stormwater conveyance channel can be used.



Working in watercourses

Minimize encroachments to live watercourses

- Non-erodible materials shall be used for construction causeways and coffer dams; earthen material may be used if armored by non-erodible material



Construction vehicle crossing of watercourse

- When construction vehicles must cross a live water course more than twice in a six month period, a temporary stream crossing of non-erodible material must be provided



Obtain required permits

- All applicable federal, state and local regulations pertaining to the activity must be met



Beds and banks

- The bed and banks of a watercourse shall be stabilized immediately after work in the watercourse has been completed



POLLUTION PREVENTION MEASURES

Prohibited discharges

(9VAC25-880-70 Part I D)

It is very important to remember that the Construction GP prohibits the discharges listed in the table below. As a VSMP inspector, if you see any of these prohibited discharges, you should take pictures and note them on your inspection report.

Wastewater from washout of concrete



Wastewater from the washout and cleanout of stucco, paint, form release oils, curing compounds, and other construction material



Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance



Oils, toxic substances, or hazardous substances from spills or other releases



Soaps, solvents, or detergents used in equipment and vehicle washing



Pollution prevention practices and procedures

(9VAC25-880-70 Part II A 4, http://www.epa.gov/npdes/pubs/sw_swppp_guide.pdf)

The following is a list of pollution prevention practices and procedures that must be in described in the P2 plan.

Concrete washout

- Concrete wash water must be directed into a leak-proof container or leak-proof settling basin
- Container or basin cannot not overflow
- Hardened and liquid concrete waste must be removed and properly disposed



Washout and cleanout of construction materials

- Prevent the discharge of soaps, solvents, detergents, and wash waters from construction materials including the clean-up of stucco, paint, form release oils, curing compounds

Examples:

- Area is covered (e.g., plastic sheeting or temporary roofs) to prevent contact with stormwater
- Adequate containment is provided for the amount of wash water used
- Disposal of waste solids and liquids is contracted with a hazardous waste disposal firm



Vehicle fueling and maintenance

- Prevent the discharge of spilled and leaked fuels and chemicals from vehicle fueling and maintenance activities

Examples:

- Secondary containment, such as spill berms, decks, spill containment pallets, is provided
- Cover is provided where appropriate
- Spill kits are readily available



Leak and spill prevention and response plan

- Procedures must be in place for quickly stopping, containing, and cleaning up spills, leaks, and other releases
- Procedure must be in place for reporting leaks, spills, and other releases



Vehicle and equipment washing

- Minimize the discharge of pollutants from vehicle and equipment washing, wheel wash water, and other types of washing

Examples:

- Washing activities located away from surface waters and stormwater inlets or conveyance and directing wash waters to sediment basins or traps
- Use of filtration devices such as filter bags or sand filters, or another similarly effective control



Construction products, materials, and waste

- Minimize the discharge of pollutants from storage, handling, and disposal of construction products

Examples:

- Litter and debris cleaned up daily
- Waste collection is located away from streets, gutters, waterways and storm drains
- Secondary containment is provided
- Waste collection area is signed



Fuels, oils, other petroleum products, hazardous or toxic wastes, and sanitary wastes

- Examples for sanitary facilities:
 - Located away from waterways and storm drains
 - Inspected for leaks
 - Maintained and cleaned



SUPPORT ACTIVITIES

(9VAC25-880-30)

Operators may also have onsite and/or offsite support activities, such as concrete or asphalt batch plants, equipment staging yards, materials storage areas, excavated material disposal areas, or borrow areas, that are covered under the CGP. The support activity must meet the following requirements:

- Directly related to the construction activity with CGP coverage;
- Does not serve as not a commercial operation, nor does it serve multiple unrelated construction activities by different operators;
- Does not operate beyond the completion of the last construction activity it supports;
- Identified in the registration statement at the time of general permit coverage;
- Appropriate control measures are identified in a SWPPP and implemented to address the discharges from the support activity areas; and
- All applicable, state, federal, and local approvals are obtained for the support activity.

As the VSMP inspector, you are responsible for inspecting any support activities covered under the CGP.

4f. Inspection Report

Inspection documentation is a major component of any inspection program. For sites with compliance issues, inspection reports detail and document the compliance issues, and make recommendations to bring the site back into compliance. Any subsequent enforcement requires a well-documented inspection. Reports must be retained by the VSMP authority for **three years** after permit termination (9VAC25-870-126).

Critical aspects of an inspection report:



Accurate, relevant, comprehensive, and objective

- Include only information that is certain, factual, and material
- Draw conclusions that are directly based on observed facts
- Include site maps or provide a good description of problem area locations that can be followed by any person reviewing the report
- Include observed weather conditions at time of inspection



Cite permit section numbers for all descriptions of potential violations



Photo documentation

- Quality is key
- Turn on time/date stamp
- Label pictures (e.g., sediment trap #2 at NW corner needs cleanout, see photo #3 and #4) and incorporate into inspection report



Include corrective actions and deadlines
