

Storm Water Compliance Inspection for Your Project

As we begin the year 2000, it is time for a refresher on the Resident Engineer's duties and responsibilities associated with water pollution control. These duties apply to all projects with Water Pollution Control Program (WPCP) or Storm Water Pollution Prevention Plan (SWPPP) requirements. It is by no means an all-inclusive list. Please refer to the *Caltrans Storm Water Quality Handbook, Construction Staff Guide* (Handbook) for more detail.



I'm Assigned as the RE, What Should I Do First?

Become familiar with the project documents that deal with water pollution control. Review the special provisions and specifications, the Handbook, Federal, State, & local regulations, and the Resident Engineer Pending File. The RE pending file should contain the following:

- Notice of Intent/Notice of New Construction & the Waste Discharge Identification Number (SWPPP projects only)
- Copies of the soils, materials and drainage reports
- Copies of all applicable permits, i.e. Water Board, Fish & Game, Army Corps, etc.

What Should I Tell the Contractor?

The pre-construction conference with the contractor is a great time to inform the participants of water pollution control requirements. Here are some tips on what to discuss at the conference:

- Applicable Permits
- Best Management Practices (BMPs)
- Time frames for submittal and review of the WPCP or SWPPP plus any amendments
- Annual Certification (SWPPP projects only)
- Winter Season Dates
- Limit of Active, Disturbed Soil Areas (DSAs)

What Should I Check for in the WPCP/ SWPPP?

Before construction can begin, the Resident Engineer must approve the WPCP or SWPPP. Certain activities can proceed without approval, but those activities cannot have the potential to cause water pollution. A review of the plan should ensure that minimum BMP requirements for the five categories, Soil Stabilization, Sediment Control, Tracking Control, Wind Erosion, and Non-Storm Water

Management, have been met. All SWPPPs should also include a schedule of values and a BMP implementation schedule.

What Should I Do During Construction?

During this period the contractor must implement the BMPs as described in the approved WPCP/SWPPP. The RE is responsible for obtaining compliance with the Standard Specifications and Special Provisions for Water Pollution Control by overseeing this implementation. The RE should review the contractor's written inspection results, looking for any indication that the implementation is not meeting water pollution control objectives, and ensure that the BMP implementation schedule is regularly updated to reflect the current stage of construction.

Field inspections are essential to verify compliance with water pollution control requirements. It is recommended that the contractor be invited to accompany the RE during field inspections. Critical requirements to be reviewed during these inspections include verifying that:

- Erosion and sediment controls are implemented on all inactive DSAs; and active, unprotected DSAs are limited as set forth in the Special Provisions
- Appropriate non-storm water management and waste management and disposal BMPs are implemented
- BMPs are being maintained in working and functional order by the contractor, and
- Required records are being maintained

Remember to file all pertinent water pollution control records in Category 20 of the RE Files.

The Project is Almost Over, What's Left to Do?

Before relief from maintenance can be granted and acceptance of the contract can occur, there are still a few more duties to accomplish. The RE should review the site with Maintenance and Environmental/NPDES representatives to discuss the stabilization of DSAs against erosion, permanent BMPs, and post- construction storm water management.

Remember, all SWPPP projects require that a Notice of Termination be filed with the State Water Resources Control Board when construction is complete and the DSAs are stabilized. In addition, all records must be kept for a period of three years following the date of termination.

