

Pre-Construction Education Training Video (8:01min)

NWA Regional Urban Stormwater Education Program

Slide 1 **Title** – Stormwater Compliance on Construction Sites in Northwest Arkansas

Slide 2 **Goals** – Stormwater management on construction sites is critical for compliance with the federal Clean Water Act. Any sites that disturb more than 1 acre must have a construction stormwater permit through the Arkansas Department of Environmental Quality. Your project is also located in a jurisdiction that has a municipal stormwater permit that requires local oversight. Construction stormwater management is important for protecting water quality in regional water resources.

Slide 3 **Water Quality** - Construction activities can cause significant stormwater pollution, harming creeks, rivers and lakes. Exposed soil, oil and grease, and trash from construction sites can make waterways muddy, increase water temperatures, and impact aquatic life.

Slide 4 **Key Issues** – This program will cover a few keys that make your project a success: Best Management Practices, the site's Stormwater Pollution Prevention Plan, required paperwork and the role of the local jurisdiction.

Slide 5 **BMPs** - The EPA defines Best Management Practices as techniques that are designed to reduce the impact of construction activities on water quality. These BMPs can be a process, activity or physical structure that control erosion, sedimentation, off-site tracking and waste management.

Slide 6 **BMPs: Soil Stabilization** – Site grading is essential, but soil erosion can be reduced by using soil stabilization BMPs such as preserving existing site vegetation, hydroseeding, using straw mulch and tacking down erosion control blankets.

Slide 7 **BMPs: Sediment Control** – Sediment control BMPs work by slowing and ponding muddy water so the soil particles can settle out before water leaves the site. Examples include trenched in silt fence, wattles and socks, reusable tubes, check dams and sediment basins.

Slide 8 **BMPs: Tracking Control** – Stabilized construction entrances and exits are designed to scrape mud off tires to prevent tracking onto streets. Another BMP is street sweeping.

Slide 9 **BMPs: Waste Management and Material Pollution Control** – Additional BMPs include stockpile management, secondary containment, trash and sanitary management, and a dedicated concrete washout area.

Slide 10 **Multiple BMPs** – An individual BMP may not manage stormwater well alone. But, the combination of several BMPs in a treatment train can be very effective!

Slide 11 **Understanding the SWPPP** – A Stormwater Pollution Prevention Plan is a document that outlines how a construction project will minimize stormwater pollution. The SWPPP describes the contractor's site-specific BMP activities to prevent pollution for the project.

Slide 12 **Understanding the SWPPP: Contents** – A consultant or engineer prepares a SWPPP that describes the site and identifies potential sources of stormwater pollution. The SWPPP explains major phases of the planned activity and details the BMPs and their placement to reduce pollutants in stormwater leaving the construction site. The SWPPP also outlines the responsibilities of contractors and subcontractors.

Slide 13 **Understanding the SWPPP: Responsibility** - The SWPPP is a legal contract to meet EPA and ADEQ requirements. It will include the statement, “ I certify under the penalty of law that I will implement this plan...” and must be signed and dated by the operator- the individual who has operational control, financial control or ownership of the site.

Slide 14 **Understanding the SWPPP: Access and Use** – The SWPPP should be kept on the construction site and available for inspections. It should record the changes to the plans and pollution prevention BMPs. Don't forget that the SWPPP is not completely finished until a Notice of Termination has been filed.

Slide 15 **Marked Up SWPPP** - A different BMP may have been used because what was originally planned was not effective. Revising BMPs are not a problem, it's just that the changes need to be documented in both the SWPPP and subsequent inspections.

Slide 16 **Understanding the SWPPP: Site Inspections** – The pollution prevention BMPs must be inspected regularly for proper installation and maintenance. Inspections must be performed by a qualified professional and the SWPPP will list whether the inspections will occur at least every 7 days or at least once every 14 days and within 24 hrs of the end of a >0.25-inch rain event. Like the SWPPP, all inspection reports must be available on the site.

Slide 17 **Inspection Form** - This is the inspection form on the ADEQ website. When conducting inspections, include the name and title of the qualified inspector and record the date and amounts of rain since the last inspection and if any discharges were evident. Describe when construction activities began, where they are happening on the site, and when they were completed and stabilized as temporary re-seeding is required within 14 days after land disturbance activities are finished. Provide information on any BMPs that need repair and any maintenance actions that were planned or taken. Record any changes that were made to the SWPPP and the reasons for the changes. And, finally, the

inspector must sign and date the inspection form. You are not required to use ADEQ's report, but alternate inspection forms must contain all elements of the state form.

Slide 18 **Permit Paperwork** – Construction activities require paperwork that can include a SWPPP, a Notice of Intent (which is the a formal request for ADEQ construction stormwater permit coverage for sites disturbing 5 or more acres), a Notice of Coverage or automatic coverage form for sites over an acre, but less than 5 acres, the accumulated site Inspection Forms, and a Notice of Termination, which is the formal request to end the permit coverage when construction is complete and the site is stabilized.

Slide 19 **Permit Paperwork** - For large construction sites (over 5 acres), the NOI is submitted to ADEQ *along with the SWPPP*. Once approved, ADEQ will issue a Notice of Coverage that must be posted on the site and the SWPPP and inspections records must be available at all times. The NOT should be submitted to ADEQ once all vegetative cover has reached 80% density. Pictures of stabilized areas must be submitted with the NOT.

Slide 20 **Permit: Large Site** - ADEQ has the permit and all applicable forms and instructions on their website.

Slide 21 **Permit Paperwork** - For small construction sites that disturb between 1 to less than 5 acres, there is no NOI and the SWPPP is not sent to ADEQ for approval, but some local jurisdictions will have their own permit and SWPPP approval process. An ADEQ Automatic Coverage form should be filled out and posted on the site and the SWPPP and inspections records also must be available. Project termination may be required through the local jurisdiction.

Slide 22 **Permit: Small Site** – Again, ADEQ has all applicable forms and instructions on their website.

Slide 23 **Permit Paperwork** – Some local jurisdictions will have requirements for sites that disturb less than one acre during construction.

Slide 24 **Role of Jurisdictions** – In Northwest Arkansas, cities and counties and the U of A have *municipal* stormwater permits and are responsible for construction stormwater compliance within their urbanized areas. These jurisdictions will provide guidance on their internal permitting process that may include reviewing and approving construction plans and getting a separate grading permit. They must conduct their own site inspections monthly, reviewing the SWPPP, the function and maintenance of BMPs and the records of weekly or bi-weekly inspections. Enforcement tools differ among jurisdictions but can include fines, performance bonds and stop work orders.

Slide 25 **Stormwater Compliance** – If you follow the keys to stormwater compliance, your project will be smooth and successful. Ensure BMPs are correctly selected, installed and maintained to prevent stormwater pollution. Understand the SWPPP and use it as a living document as construction progresses. Conduct regular inspections as outlined in the SWPPP and ensure all records are available on

site. Complete required paperwork that demonstrates the site is properly managed and permitted from first disturbance through final stabilization. And, communicate! Communicate expectations and responsibilities with all the contractors and subcontractors working on the site. Communicate with inspectors to improve BMP maintenance and transcribe important details in the SWPPP on the site map. Communicate with the jurisdiction for compliance with local requirements.

Slide 26 **Know the Flow** – You play a critical role in protecting regional water quality. Know the flow of stormwater from your site and be a partner in pollution prevention.