

STORMWATER INSPECTION PROCESS

Dallas Grossman
North Dakota Department of Health
Division of Water Quality



NORTH DAKOTA
DEPARTMENT *of* HEALTH

AGENCIES

- North Dakota Department of Health
- U.S. Environmental Protection Agency
- Inspections may be conducted by one or both agencies
- Joint inspections
- Oversight inspections

WHAT PROMPTS AN INSPECTION

- No controls are observed
 - Either by the agency, public, or competition
- Location
 - Proximity to waters of the state
 - Terrain
- Size
- Complaints
 - Dust
 - Tracking dirt on to a street
 - Dirt depositing off site (i.e., street, waterways)

WHAT PROMPTS AN INSPECTION

- If the site looks good and every other site in the area looks good, then someone is going to be inspected

PRE-INSPECTION MEETING

- Contact a project representative
- Identify ourselves
- Begin or schedule an inspection
- Explain the purpose of the inspection
- Identify the lead inspecting agency
- Identify what will be reviewed

PAPERWORK

- Do you have the following:
 - A copy of the notice of intent (or application)
 - The permit coverage letter from the North Dakota Department of Health (or EPA if working within tribal boundaries)
 - A copy of the construction general permit, NDR10-0000
 - The stormwater pollution prevention plan (SWPPP) for the project
 - Stormwater inspection records for the project
- If you don't have these items readily available, can you send them in a reasonable amount of time.
 - Before we ask for them in a letter
 - Typically within 3 days

SWPPP

- Is the plan complete
- Is it being implemented
- Does it match the site conditions
 - Remember, it is a living document and can be changed as the project progresses

YOUR INSPECTIONS

- Are inspections being conducted according to the construction general permit
- Are they being done according to the SWPPP
- Are you looking at everything you're supposed to
 - Are erosion and sediment controls **identified in the plan** operating correctly and in servicable condition
 - Are you looking at discharge outlets from
 - Material storage areas
 - Permanent stormwater controls (e.g., detention ponds)
 - Vehicle maintenance areas

PROJECT REVIEW

- Walk the project
- Review erosion and sediment control measures
- Review good housekeeping practices
- Look for evidence of past spills
- Compare site conditions with the SWPPP

INSPECTION CLOSE-OUT

- Identify issues noted during the inspection
 - Note: Additional issues may be identified after the close-out meeting based on a review of inspection notes
- Ask that any noted issues be corrected
- Ask for documentation of corrective actions
 - Timeliness of corrective actions will go into the inspection report
- Explain that an inspection report will be sent within 45 days
- Explain which agency will send the report
- Ask who should receive the inspection report

INSPECTION REPORT

- Identify any issues noted during the inspection
- Identify any corrective actions made since the inspection
- Ask for a response to the inspection report
 - Items that still need to be addressed
 - How these issues will be prevented in the future
- Give a timeline for response
- Identify where to send the response

RESPONSE REVIEW

- The inspecting agency will review the response
- The agency will make a determination whether any additional action is needed
 - No action
 - Informal enforcement
 - Formal enforcement

COMMON DEFICIENCIES

- BMPs for erosion and sediment controls are not employed
- NOI has not been submitted
- SWPPP has not been developed or followed
- Inspections have not been conducted or recorded
- Maintenance has not been conducted

COMMON DEFICIENCIES

- Three of the common deficiencies are paperwork related (NOI, SWPPP, inspections)
- Why is paperwork important?
 - A SWPPP is the strategy used to discharge clean stormwater from the project
 - Inspections communicate to others the effectiveness of the strategy
 - Maintenance records track corrective actions that occurred

COMMON BMP ISSUES

No inlet protection



BMPs not installed correctly





10/14/2008



2/29/2016



10/14/2008

2/29/2016



10/14/2008

2/29/2016

Inappropriate BMPs



No BMPs or Stabilization



No BMPs or Stabilization



BMPs not maintained





2/29/2016



06.15.2009 12:16

2/29/2016

TRACKING



09.24.2008 01:25

2/29/2016



09.24.2008 01:25

2/29/2016

LOOK AT OUTFALLS



2/29/2016



31 11:34 AM



31 11:33 AM

2/29/2016



2/29/2016

DEWATERING



06.17.2009 14:20



06.17.2009 14:19

2/29/2016

SIGNIFICANT MATERIAL STORAGE



09.23.2008 20:52

2/29/2016



2/29/2016



2/29/2016



2/29/2016



REMOVE BMPS WHEN STABILIZED
(or not needed)



09.24.2008 00:08

2/29/2016



09.22.2008 23:02

2/29/2016



09.22.2008 23:01

2/29/2016



06.17.2009 15:57

2/29/2016

WET WEATHER INSPECTIONS



24 9:44AM

2/29/2016



10/15/2008

2/29/2016



2/29/2016



07.29



07.29.2009 16:28

2/29/2016



2/29/2016



24 9:48 AM

2/29/2016



2/29/2016



12 2:58 PM

2/29/2016



7 10:05 AM

4/29/2016



7 10:05 AM

2/29/2016



06.16.2009 15:37

2/29/2016



2/29/2016



2/29/2016



06.16.2009 14:16

2/29/2016



06.16.2009 14:15

2/29/2016



7 9:31 AM

2/29/2016



7 9:42 AM

2/29/2016



2/29/2016



06.16.2009 14:05

2/29/2016



06.16.2009 14:02

2/29/2016



2/29/2016

...AND CLEAN UP AFTER YOURSELF



06.17.2009 16:11

ANY QUESTIONS?



06.17.2009 16:11