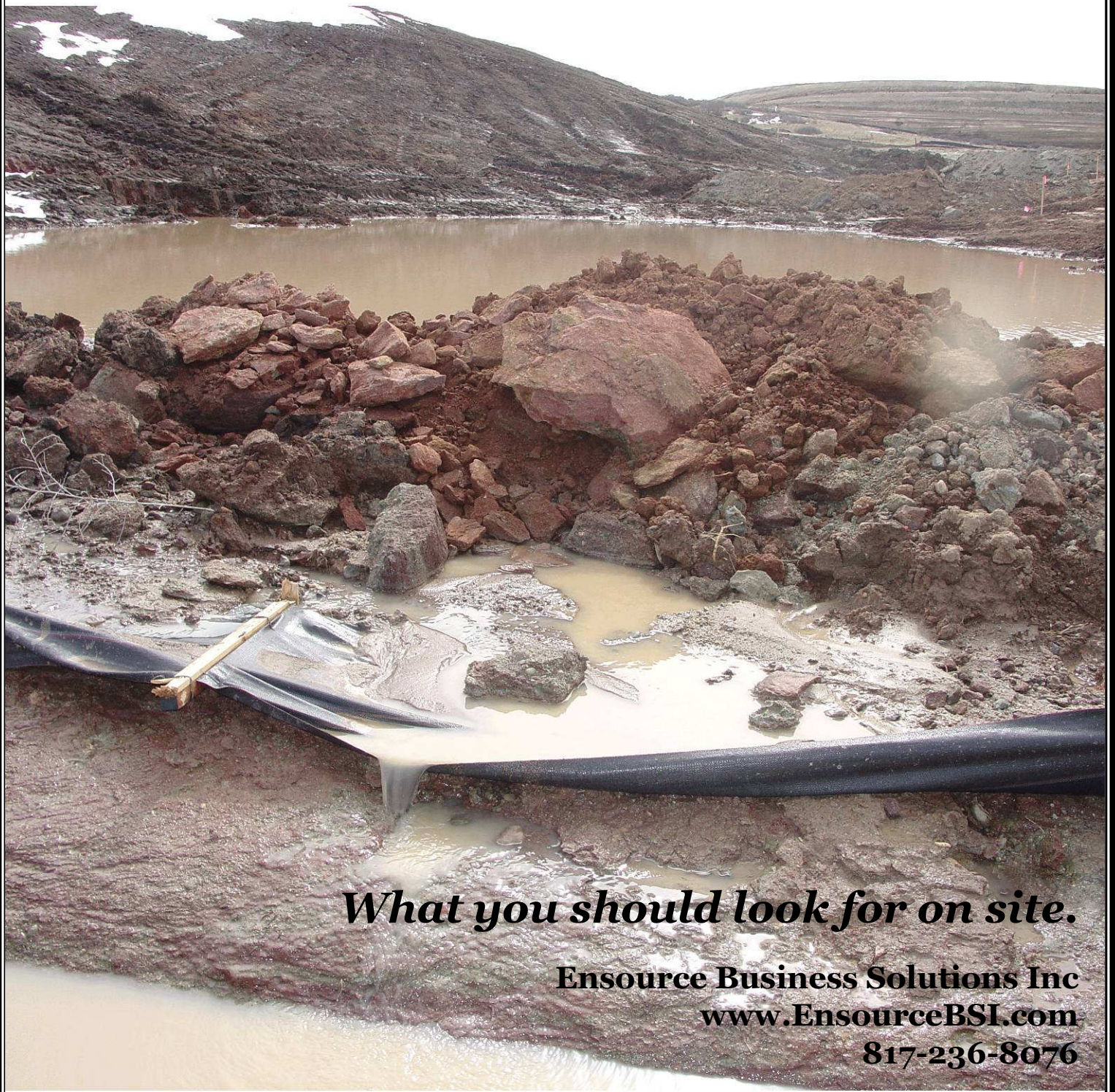


Performing Stormwater Inspections – A Guide

The “Dirty Dozen” of Stormwater Compliance



What you should look for on site.

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What You Should Look For on Site

Although obtaining a stormwater plan and a permit is required to stay in compliance, the ongoing compliance comes down to managing the site through inspections. As you manage your sites, there are general items to look out for that will help you stay in compliance regardless of where you are. These are simple items, but they can save you a lot of time, money, and liability if you follow them. We like to call these the Dirty Dozen of Stormwater Compliance. If you can control these items, then you will be well on your way to having a successful project.

1. Clean Dirt From the Street.

- a) One of the first items a regulator or concerned citizen will notice is dirt (sediment) that has left the site and entered the street. One of the best things you can do to help yourself is to keep dirt out of the street.
- b) Cleaning the dirt DOES NOT mean washing it onto someone else's property or in a storm drain. This is strictly prohibited and could draw severe penalties.



2. Remove Uncontained trash

- a) This is not only a potential pollutant, but it can be a nuisance to neighbors, and an eyesore for the regulators and citizens. Federal enforcement actions pertaining to stormwater have stemmed from a regulator observing a piece of trash blow across the road.



3. Maintain Existing Vegetation

- a) Probably your best and cheapest BMP control is vegetation. Try to avoid damaging existing vegetation at all costs. This will not only save you money, but also liability.



4. BMPs – Best Management Practices

- a) Install BMPs
 1. You should look at your site with a critical eye and ask the question, "If it were to rain, where are the possible places the water would exit my site?" Then make sure you have controls in place at each of those locations to filter or contain the water. This may be at a single point or across the entire property boundary as water sheet-flows from your site.
- b) Repair damaged BMPs
 1. Even if a BMP is not in use, it must be repaired or removed. Otherwise, you can be cited for failure to repair inadequate BMPs.
 2. The general rule of thumb is if a BMP's capacity has been reduced by 50% it needs to be repaired.



5. Install Vehicle Tracking Pads

- a) Install tracking pads made of crushed rock at every entry and exit point where a vehicle could leave the pavement and enter the exposed dirt.
- b) Prevent vehicles from entering the dirt unless absolutely necessary and only at controlled locations. For example, if you are building a home, try to prevent others from parking on the lot.



6. Properly Store Materials

- a) Designate a place for storing materials that is protected. This is especially true for hazardous materials such as fuel, paints, or oils. These need to be in a safe place, preferably out of the weather. One of the easiest ways to get fined is to spill a hazardous material, which leads us to...



7. Clean-Up Hazardous Spills

- a) If you have a hazardous spill, you need to follow the rules below. It should be noted that you risk the greatest penalty for failing to record the event.
 - I. Contain it.
 - II. Collect it.
 - III. Dispose of it.
 - IV. Document it.



8. Look Out for Stormwater From Other Properties

- a) Similar to driving, it is usually the other driver you have to watch for. With stormwater, if the water leaves someone else's property and enters yours, you are now responsible for it. You need to identify areas where your site could gain additional water and be prepared to handle it.
- b) Talk to the neighbor. You should talk to the neighbor about their responsibility to manage and contain their stormwater and minimize the pollution that it carries.
- c) As a note, if water is coming onto your site from a neighbor, you should record it in your plan and inspections so that when a regulator shows up you will be able to show documentation of how you attempted to address it.



9. Protect Dirt Stockpiles

- a) Dirt stockpiles need to be protected, and if they go inactive, they must be stabilized. Every entity varies on the length of time required before an area is deemed inactive, but it is usually 14 to 21 days. If the stockpile is going to sit there, then you need to seed it, or cover it with plastic or erosion blankets, and need to protect the downhill perimeter with silt fence or other BMPs if the runoff from the pile is in danger of leaving the site.



10. Contain Concrete and Paint Wash Waters

- a) All wash waters need to be contained through the use of a washout. You need to install a concrete washout on site to allow your subcontractors to dump concrete and paint residue. Latex, or water based paints can usually be disposed of in the concrete washout, but you will need to talk to your local regulator to find out what they allow.



11. Secure Portable Toilets

- a) Portable toilets are a potential source of pollution. If they get tipped over or damaged, they can leak hazardous materials directly into the storm sewer system. Portable toilets need to be anchored down and inspected to make sure they are not located next to a storm drain and are not in a place with the potential to be damaged or leak. The location of the toilets needs to be indicated on the map.



12. Protect Inlets and Streams

- a) If there are any inlets on or adjoining your site, you need to make sure they are covered and protected in a way that keeps sediment and other pollutants from entering them. Each local entity will have BMP controls that are allowed and disallowed for this type of protection. You will want to check with them to make sure you are using the proper control.
- b) Also, if you are near a stream you need to make sure you have controls in place to prevent sediment and other materials from entering the stream. This could be similar to the controls that are placed to protect the perimeter of your property.



13. Protect Detention Ponds

- a) Most people believe that if you have a detention pond then you don't have to worry about the stormwater runoff on your site. This is incorrect.
- b) In many areas, the EPA has ruled that a detention pond can be deemed a "water of the US" because a duck can land on it when there is water and a fish could swim in it. This assertion has been argued and ruled on many times. The basic rule of thumb is, if the water is clean when it reaches the pond, then you're okay either way.



Well, more like a "Baker's Dozen!"