

# The Monthly Dirt

A Monthly Newsletter on the California Construction General Permit  
By WGR Southwest, Inc.

## OVER SITE Oversight



According to the State Water Board's SMARTS website, there are nearly 8,000 active construction projects having coverage under the Construction General Permit. However, there are only approximately 5,675 QSPs with active and valid certifications. How are so few QSPs going to adequately cover this number of construction sites? The writers of the Construction General Permit foresaw this problem and made provision to have QSP oversight over sites.

**Permit provisions** – The CGP states that the discharger must ensure that all BMPs required by the Permit are implemented by a Qualified SWPPP Practitioner (QSP) who is also the person responsible for visual observations, sampling and analysis. If you have been a QSP on an active medium to large-size project, you know that it can be pretty much a fulltime job especially during the rainy season. It takes quite a bit of effort to supervise the implementation and maintenance of BMPs, train on-site staff on how to install and maintain them, perform daily (LUP) or weekly (traditional) inspections, prepare Rain Event Action Plans, perform pre-storm, during-storm, and post-storm inspections, calibrate field instruments, take pH and turbidity readings, prepare documentation, enter data onto SMARTS, and communicate information to the QSD for SWPPP revisions. Now, that is just for one site ... but if a QSP has to cover more than one site, it can become way more than a fulltime job. So, fortunately the CGP contains allowances that keep QSPs from going completely insane. The permit states the following in Attachment A for LUPs, and in Attachments C, D and E for Risk Levels 1, 2, and 3, respectively,

*“Dischargers shall ensure that all inspection, maintenance repair and sampling activities at the project location shall be performed or supervised by a Qualified SWPPP Practitioner (QSP) representing the discharger. **The QSP may delegate any or all of these activities to an employee appropriately trained to do the task(s).**”*

The permit goes on to state,

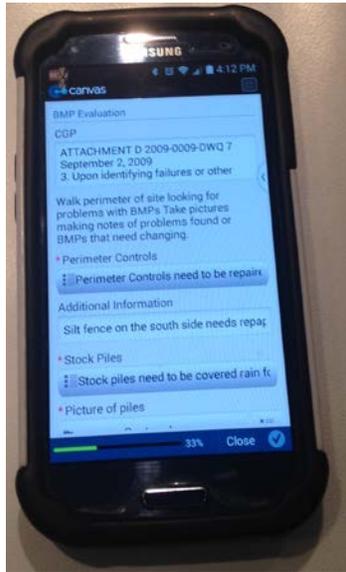
*“Dischargers shall perform weekly inspections and observations, and at least once each 24-hour period during extended storm events, to identify and record BMPs that need maintenance to operate effectively, that have failed, or that could fail to operate as intended. **Inspectors shall be the QSP or be trained by the QSP.**”*

This is good news! The QSP can have help!

**Appropriately Trained** – So what does the Permit mean by “an employee trained to do the task(s) appropriately”? Well, it doesn't define the concept any further than what you see in the previous citations. Therefore, it is up to the QSP to define it. However, delegating a task, obviously, needs to be much more than a quick phone call to Joe asking him to grab the turbidity meter and cover for you today. The key word is “task” – whatever job that has been delegated by the QSP to his/her helper needs to have training to go with it. If the delegated task is performing a weekly inspection, then the QSP needs to train the helper on what to look for; the purpose and function of the BMPs that they are inspecting; what conditions require maintenance; and how and where to document the inspection results. If the QSP wants the helper to test for pH and turbidity during a storm event, the training will need to include how to calibrate and use the pH pen and turbidity meter; where to sample and test; how to collect representative samples; when to sample; how to average the results and compare them to Numeric Action Levels; and how to document the testing results. Now keep in mind the recordkeeping requirements of the permit – all records, which includes training records, must be kept for 3 years from the date generated. If you are delegating QSP responsibilities, make sure that you have documented and have on file the training documentation for the tasks that they will be performing. We have found that one good way to train delegated persons on these responsibilities is to send them to the 2-day QSP course. This gives them a good foundation on the CGP and, combined with some on-the-job training, assures that they have been appropriately trained.

**Supervised Oversight** – Now that the QSP helper has been appropriately trained for the tasks that he/she may be performing, it is important that the QSP doesn't abandon them. The QSP must have supervision over the site at all times and be responsible for the implementation and maintenance of the BMPs and the deployment of the inspection program. But, how

should this work? Not too long ago, inspections were primarily completed using paper copies of inspection forms that were physically placed in the SWPPP binder kept on-site. It was pretty difficult to have adequate oversight of delegated inspectors if the QSP did not see inspection reports and testing data until it was time to gather them for the annual report. Now with advances in technology, even since the current CGP came out five years ago, it is much easier to maintain a higher level of accountability and supervision. Many QSPs today utilize electronic inspection forms or smart phone apps to document their inspections. This allows the QSP to have adequate oversight of several persons performing inspections and testing at multiple locations. Today's QSP is not only equipped with a crew of helpers but also with a selection of high-tech tools. These tools include a smart phone inspection app that emails a copy of the inspection report "stamped" with the latitude, longitude, date and time of the inspection, photos of the site and problem areas, a photo of the rain gauge, a list of items needing corrective action, and the inspector's signature. Other potential "smart" tools include an on-site rain gauge that syncs with [Weather Underground™](#), FaceTime™ for the QSP to "see" what the delegated inspector is seeing real time, and weather apps that track the storm's progress. With these tools, a QSP can be assured that the inspection is being performed. However, we still feel that actual site visits are needed by the QSP on a regular basis. So even with the use of the above-mentioned tools, we suggest that the QSP visit and review the site and compliance documents at least once per month. In addition, if for some reason, a weekly inspection has not been performed by the delegated helper within 10 days, or a during-storm inspection within 36 hours, then it is vital that the QSP go to the site in person and continue to do so until they are assured that the delegated person will resume their responsibilities. *MD*



## Upcoming Training

Got SWPPP? Classes coming to Lodi:

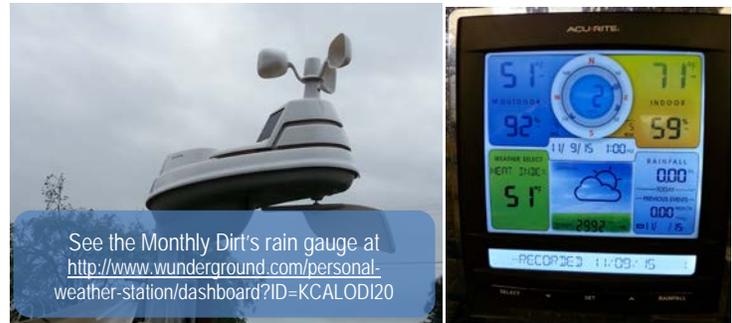
- ✓ QSP/QSD Training, [December 1 - 3, 2015](#)

(For more information about these classes, go to [www.gotswppp.com](http://www.gotswppp.com).)

- ✓ **BMP Roundup Event** – happening on **November 19, 9AM-3PM** at the WGR Lodi office. See the attached flyer for more info. (*Space limited --- only a few spots left.*)

## One Smart Rain Gauge

One frustration for a QSP or his/her helper is knowing whether or not it is actually raining on site. Has this happened to you? All the online weather prediction tools and radar say that it should be raining at the site, but when you arrive to the project you find it bone dry. Wouldn't it be nice to be able to log in and see if it is raining and how much they have received in order to determine if it will be qualifying or not? Well, that can now be done, without breaking the bank for a super expensive weather station. It will cost about \$150 to buy the rain gauge, require an internet connection, and some time in setting it up so that the receiver will communicate with the rain gauge and sync with Weather Underground. But with some patience, you can be transmitting your weather online and check the rain totals from anywhere.



The Acu-Rite 5-in-1 Weather Station is available from:

[www.acurite.com](http://www.acurite.com) and

[www.cabelas.com](http://www.cabelas.com) (currently on sale for \$99.99)

*Please contact us if you have any questions ...*

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Technical Questions about Environmental Compliance?

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# Quick QSP Quips

## Required Inspections

### Risk 1, 2 & 3 – Traditional Projects:

- Weekly BMP inspections
- Pre-storm (within 48 hours before)
- Post-storm (within 48 hours after)
- During storms (every 24 hours)
- Quarterly for non-storm water flows

### Risk 2 & 3 – Traditional Projects:

- Daily inspect immediate access roads for sediment and track out

### LUP Types 1, 2 & 3 Projects:

- Daily visual BMP inspections and ensure that photographs of the site are taken before, during, and after storm events are taken during inspections, and submitted through the State Water Board's SMARTS website once every three rain events.

### LUP Types 2 & 3 Projects:

- Pre-storm (within 48 hours before)
- Post-storm (within 48 hours after)
- During storms (every 24 hours)

### Risk 3 & LUP Type 3 Projects:

- *If triggered*, receiving water or bioassessment observations

## Sampling Requirements

### Risk 1 – Traditional Projects:

- Only for non-visible pollutants if triggered

### Risk 2 & 3 – Traditional Projects:

- Discharge monitoring (pH and turbidity) at least 3 times per day when there is a discharge
- Non-visible pollutants *if triggered*.

### Risk 3 – Traditional Projects:

- Upstream and downstream receiving water testing *if triggered*.
- Bioassessment *if triggered*.

### LUP Type 1 Projects:

- Only for non-visible pollutants if triggered

### LUP Types 2 & 3 Projects:

- Discharge monitoring (pH and turbidity) at least 3 times per day when there is a discharge
- Non-visible pollutants *if triggered*.

### LUP Type 3 Projects:

- Upstream and downstream receiving water testing *if triggered*.
- Bioassessment *if triggered*.

### Non-visible sampling – All Risk and Type Levels:

- Triggered by a breach, malfunction, leakage, or spill observed during a visual inspection.
- Collected during the first 2 hours of discharge.
- Two samples one at the affected discharge point and another at an unaffected area

## RAIN EVENT ACTION PLANS

- ☁️ Required of Risk 2 & 3 traditional projects only. LUPs are not required to prepare REAPs.
- ☁️ Are triggered by a 50% or greater possibility of rain per the NOAA weather forecast at [www.srh.noaa.gov](http://www.srh.noaa.gov)
- ☁️ Must be prepared within 48 hours of the predicted storm event.
- ☁️ Must be implemented and a paper copy on-site within 24 hours of the predicted storm event.
- ☁️ Must be prepared by a QSP.

## Qualifying Rain Events

A qualifying rain event is “any event that produces 0.5 inches or more precipitation with a 48 hour or greater period between rain events.” *In other words, it is a period of rain that is “bookended” by dry weather that is at least 48 hours long.*

## Sampling Exemptions

1. It is not a “qualifying rain event”.
2. During dangerous weather conditions such as flooding and electrical storms.
3. Outside of scheduled site business hours.

Remember to document if any of these exemptions are applicable to your project.

### Numeric Action Levels

Prepare a NAL exceedance report within 10 days if either of the following is true about your project's daily average:

pH is <6.5 or >8.5  
Turbidity is >250 NTU

- ✓ NALs are daily averages of monitoring data from all discharge points for the entire day.
- ✓ pH must be averaged logarithmically. Averaging tool is at [www.wgr-sw.com/pH](http://www.wgr-sw.com/pH)
- ✓ NAL exceedance reports must be uploaded onto SMARTS.

### Rules of Engagement for Sampling

The following are helpful guidelines that have been extracted from the permit to assist you in knowing when to sample:

1. If there is no discharge, then no sample is required.
2. Collect a minimum of 3 samples per day for the entire site.
3. Each day, collect at least one sample from each point of discharge.

### Best Management Practices

- ❑ Risk 1 mandatory BMPs are found in Attachment C.
- ❑ Risk 2 mandatory BMPs are found in Attachment D.
- ❑ Risk 3 mandatory BMPs are found in Attachment E.
- ❑ LUP mandatory BMPs are found in Attachment A.
- ❑ The QSP must use a checklist for inspections and include a description of the BMPs evaluated and the deficiencies noted.
- ❑ Corrective action must begin within **72 hours** of identification and be completed as soon as possible.
- ❑ Inactive areas of soil disturbance that are not scheduled to be disturbed for at least 14 days must have effective soil cover.
- ❑ Projects must establish and maintain effective perimeter controls and stabilize all construction entrances and exits to sufficiently control erosion and sediment discharges from the site.
- ❑ Risk Levels 2 & 3 and LUP Types 2 & 3 projects must apply linear sediment controls along the toe of the slope, face of the slope, and at the grade breaks of exposed slopes to comply with the table shown at the right.

Slope Percentage	Sheet flow length not to exceed
0-25%	20 feet
25-50%	15 feet
Over 50%	10 feet

Questions? Call the QSP Help Hotline:  
(209) 649-0877 or email at  
[jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com)

Quick QSP Quips copyrighted October 2013  
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**For more information ...**

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