



PERFORMING AN EFFECTIVE SITE INSPECTION

After visiting a few sites and working on a couple of cases lately, when people get in trouble for discharging sediment downstream to someone who didn't ask for it, I thought it might be a good idea to briefly discuss the basics of an "Effective" Site Inspection. Performing good site inspections are not hard, but they do take effort. Effort to learn about what the NPDES Permit requires and effort to actually perform them in the field, and that's usually where I see the weakness.

Managing your construction site as a stormwater treatment system is key to understanding compliance with your NPDES General Permit and/or local Land Disturbing Activity (LDA) permit. You cannot look at the project as a "construction site" and expect to be in compliance with the NPDES Permit. When stormwater picks up sediment and attempts to take it down to surrounding creeks, rivers and lakes; it requires a properly designed, installed and maintained treatment system. When an inspector arrives to perform an inspection, the first place they are trained to look is the permit box and/or site trailer. Unfortunately, it's been discovered that usually,



this is as far as they need to go to find the first of many permit violations. Record keeping violations continually rank among the top regulatory offenses on construction sites around the nation, which can result in Stop Work Orders & significant fines.

The 8 steps written below are in relation to Georgia's construction NPDES General Permit rules. No matter what state you live in however, just know that Inspection records must always show that BMPs are installed and maintained in accordance with the assigned SWPPP, and it's the records stored on site that prove efforts have been taken to comply with the permit. By simply reading the permit, a permittee can learn what documents their NPDES Permit are required on site when the inevitable rain event causes others to look upstream for the source.

The following list identifies the basic requirements an inspector should evaluate every time they make a site visit.

- 1) Notice of Intent (NOI) & Proof of Submittal
- 2) Copy of the SWPPP (or in Georgia the ES&PC Plan)
- 3) Design Professional 7-day Inspection Letter
- 4) Water Quality Monitoring (Sampling) Reports
- 5) Site Inspection Reports
- 6) Violation Summary
- 7) Rainfall Data
- 8) Records Retention

[CLICK HERE](#) to download the Guidance Document with a detailed explanation of each line item.

[Click Here](#) for General Permit References

[Click Here](#) for Site Inspection Forms

To learn how to determine if a site has filed a valid Notice of Intent (NOI) and is in the Georgia EPD Online System, [CLICK HERE](#).



In closing, a regulatory Inspector must look at themselves as educators, not just regulators. What that means is, when conducting your site inspections, you should teach the compliance inspector on how they should perform an effective site inspection, and not perform the inspection for them.

You do this by auditing their inspection as you walk the site with them. This of course only works if the local regulatory inspector actually performs a knowledgeable and effective site inspection; and that's where the NPDES Training Institute can help you learn, if you need it.

WE always welcome your feedback! Please let us know your thoughts and we'll do our best to answer your questions!



Sincerely,
Luke

T. Luke Owen, PG MS4CECI
tlowen@npdestraining.com

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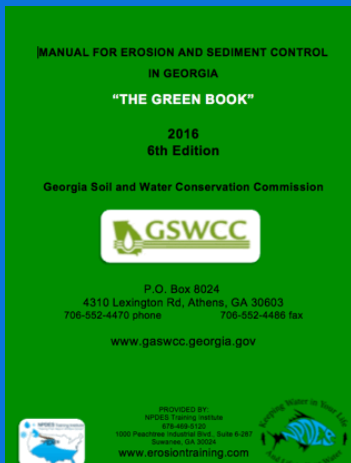


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ASSOCIATED GENERAL CONTRACTORS

UPDATE
PROPOSED WATERS OF THE US (WOTUS) RULE!

**DON'T BE
DECEIVED.....**although this
might seem like really boring
subject matter. **IT WILL HAVE**



CLICK HERE
To Learn About Sediment Pollution

period that concludes on **April 15, 2019**.

Public Outreach Opportunities:

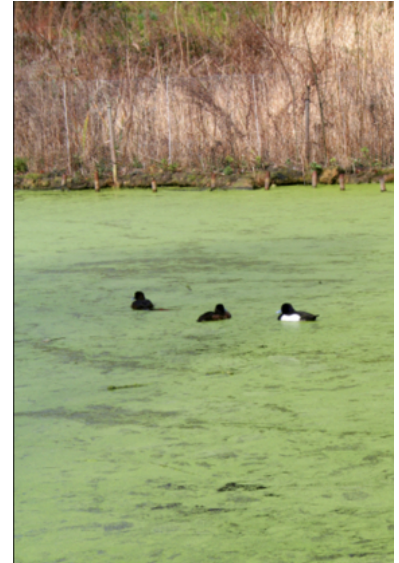
Public Webcast - The public webcast was held on February 14, 2019.

EPA and the Army held a public webcast to help explain the key elements of the proposed "Revised Definition of Waters of the United States" on Thursday, February 14, 2019. [The webcast can be viewed here.](#)

Public Hearing

NOTE - The public hearing has been rescheduled for February 27 and February 28, 2019.

EPA and the Army will hold two public hearing sessions on the proposed "**Revised Definition of Waters of the United States**" on Wednesday, February 27, and Thursday, February 28, 2019 at the **Reardon Convention Center in Kansas City, KS**. A Federal Register notice for the rescheduled public hearing was published on February 7, 2019.



Cause: Unregulated Agricultural Stormwater Discharges. What does common sense say here?

*Stay tuned for more information about this very controversial issue of **how to feasibly grow economically without trashing our surface waters.***

[Click on this link](#) to learn more about the proposed rule.

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**" Those who forget the mistakes of the past,
are doomed to repeat them!"**



PITTMAN ROBERTSON

**Wildlife Restoration
Act
Our Key to a Healthy
Hunting
Environment**

DINGELL JOHNSON **Sportfishing Restoration Act**

This quote has been repeated many times for different reasons; but in this case I'm applying it to our water quality. Many people alive today have either forgotten, or have never lived, near a river that was severely polluted.

Before NPDES became the most effective water quality protection program in the world, we had no recourse for polluters that willingly and legally chose to pollute our watersheds. That said, you will find below a perspective taken from a fellow stormwater professional here in Georgia that, in my opinion, nails the problem of watershed protection to it's most basic element.....



"There are six entities involved in ensuring that construction sites don't pollute our waterways. They are:

- the design professional;
- the Local Issuing Authorities (LIA's) plan reviewer;
- the General Contractor;
- the Owner/Developer;
- the LIA's ES&PC inspector; and
- the elected officials who are in charge of the city/county jurisdiction where the land disturbance is occurring.

That's a lot of different players, under the construction umbrella, trying to please different people on the same project; and their best interests aren't necessarily aligned with one another. The design professional and the contractor want to please the owner/developer. The plan reviewer and the inspector want to please the elected officials they work for.

Developers are in business to make a profit (and there's NOTHING wrong with that), but they will do the right thing with regard to clean water, and do it gladly, IF they know what they need to do in order to have a successful (i.e., profitable) project.

So, what it all boils down to is: Do the local elected officials prioritize protecting natural resources -- especially their waterways or not?"



We all know that state and local officials will listen to the people who elect them, but only if the people who elect them into office are louder and clearer about prioritizing our natural resources over an imbalanced focus of economic growth. I've seen over and over again, if the state government has low expectations for watershed

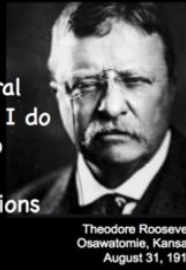
protection, local governments will not be pressured to protect water quality, which more often than not, results in poor water quality for the residents that live in that jurisdiction.



T. Luke Owen, PG MS4CECI

***HERE's TO TIGHT LINES & GOOD TIMES
in Clean Abundant Water!!!***

"Conservation means development as much as it does protection. I recognize the right and duty of this generation to develop and use the natural resources of our land but I do not recognize the right to waste them, or to rob, by wasteful use, the generations that come after us."



Theodore Roosevelt
Osawatimie, Kansas
August 31, 1910

Freedom and Liberty are not free. People have sacrificed their lives and are sacrificing their lives that give us what we so often take for granted today. Similarly, respecting our neighbors downstream and the critters that are trying to live in our urban watersheds is more important now than ever! Respecting those downstream from your construction and industrial operations is what America is all about.

It's compliance with NPDES Permits that prove our respect!

Sincerely,
NPDES  **TRAINING INSTITUTE**

A blue ink handwritten signature of T. Luke Owen.

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President

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