# Transitioning from SWPPP Development to Field Implementation

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Katie Mallen, QSD | Emily Hayes, QSD

# Meet the Presenters

- Katie Mallen, Stormwater Plans Specialist II
  - BS in Civil Engineering from CSU Chico (2020)
  - Engineer-in-Training
  - QSP/QSD
  - Has been with TCG for 4 Years

- Emily Hayes, Stormwater Plans Specialist II
  - QSP/QSD
  - Has been with TCG for 9 Years

# Tully Consulting Group

- Tully Consulting Group is a Stormwater Management and Civil Engineering Consulting Firm, based in Northern California
- TCG Specializes in WPCPs, SWPPPs and Diversion plan preparation and qualified stormwater inspections
- TCG is a Registered DBE, WBE, and SBE Firm.

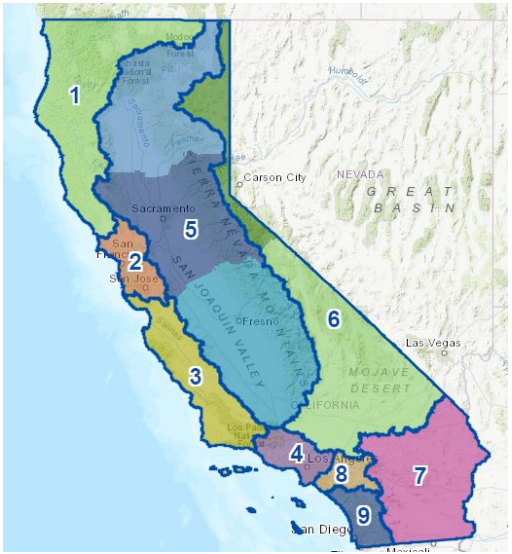

# Helpful Acronyms

- **CGP**- Construction General Permit
- **WPCP**- Water Pollution Control Plan/ Program
- **SWPPP**- Stormwater Pollution Prevention Plan
- **QSP**- Qualified Stormwater Practitioner
- **QSD**- Qualified SWPPP Developer
- **SMARTS**- Stormwater Multiple Application and Report Tracking System
- **LRP**- Legally Responsible Person(s)
- **NOI**- Notice of Intent
- **WDID**- Waste Discharger Identification
- **COI**- Change of Information
- **NOT**- Notice of Termination
- **QPE**- Qualifying Precipitation Event
- **BMP**- Best Management Practices
- **NAL**- Numeric Action Levels

# Workshop Curriculum

- Open lines of communication during SWPPP Development
- Keeping SWPPP alive and compliant during construction
- NOT and closing project out

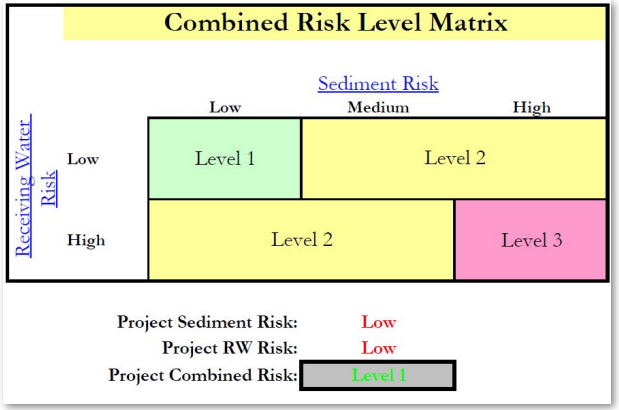
**This Workshop is specific to the California Construction General Permit*



# Open Lines of Communication During SWPPP Development

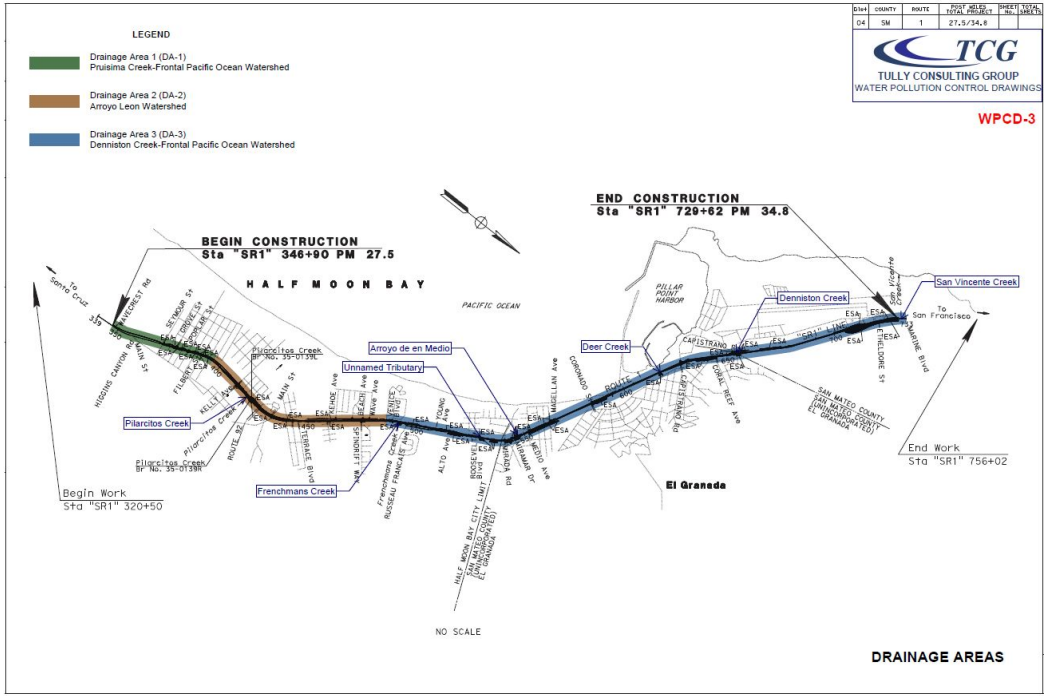
# SWPPP Development

- Reviewing all project plans, specifications, permits, and any other supplemental information including post construction documentation
- Discussing the project and any SWPPP related details, including any environmental or scheduling restrictions with the contractor and/ or owner
- Recommend taking pre-construction photos
- Risk assessment, possible erosivity waiver



# SWPPP Development

- Determine watershed and drainage areas within the project



# SWPPP Development

- Include all applicable unique site features and project specific BMP narratives

### 300.5 Unique Site Features

Project has Fill Material: ☒ Yes ☐ No

Project has Native Material: ☒ Yes ☐ No

Hydrologic Soil Group: ☒ A (high infiltration rate) ☐ B (moderate infiltration rate) ☒ C (slow infiltration rate) ☐ D (very slow infiltration rate)

Soil Erodibility: ☐ Slight ☒ Moderate ☐ Severe

Unique Features Onsite: ☒ Water Bodies ☐ Wetlands ☒ Endangered or Protected Species ☐ Environmental Sensitive Areas ☒ Other ☐ None

RUSLE2 requirements: ☒ Surface Water Buffer ☐ TMDL Watershed

Proposed Site Operations: ☒ Demolition ☐ Dewatering ☐ Active Treatment System

The project is located in and near San Jose, Santa Clara County, California.

San Jose, CA climate is warm during summer when temperatures tend to be in the 80's and cool during winter when temperatures tend to be in the 50's. The warmest month of the year is July with an average maximum temperature of 84.3 degrees Fahrenheit, while the coldest month of the year is December with an average minimum temperature of 41.0 degrees Fahrenheit. Temperature variations between night and day tend to be moderate during summer with a difference that can reach 27 degrees Fahrenheit, and fairly limited during winter with an average difference of 18 degrees Fahrenheit. The annual average precipitation at San Jose is 15.1 inches. Winter months tend to be wetter than summer months. The wettest month of the year is January with an average rainfall of 3.03 inches.

This project is within or near habitat for the following regulated species:

- Raptors
- Owls
- Bats
- Migratory and Nongame Birds

Species protection areas within the project limits are as specified in the following table:

| Species Protection Areas | |
|---|---|
| **Identification Name** | **Location** |
| Species Protection Area 1 (SPA 1) | Entire Project Limits |

Within Species Protection Area 1 (SPA 1), implement the following protection measures:

1. Notify the Engineer 30 days before start of job site activities to allow preconstruction clearance surveys.
2. During bird-nesting season (February 1-September 30), do not disturb ground, remove vegetation, prune plants, saw cut or grind pavement, or work on existing structures without authorization:
   a. Notify the Engineer to allow bird survey of the job site by Department's biologist:
      i. 10 days before starting initial work.
      ii. 5 days before resuming work.
   b. Authorization is valid for 72 hours whether or not you perform the work.
3. Direct lights away from vegetated areas and minimize light spillage.
4. Do not use plastic monofilament netting.
5. Do not bring pets onto the job site.
6. Firearms are not allowed on the job site except for those carried by authorized security personnel or local, State, or Federal law enforcement officials.

If you use any property outside the job site for the sole use of the project, and soil or vegetation will be disturbed:

1. Obtain all PLACs under applicable environmental laws, regulations, orders, and decrees.
2. Submit those PLACs at least 15 business days before starting work on the site.

Refer to Section 14 of the Contract Documents for additional information and requirements.

### 300.6 Potential Pollutants from Site Features or Known Contaminants

Former site usage or known site contamination may contribute pollutants to stormwater discharges from the site. Based on information available for the project site, the following site usage and historical contamination has been determined:

This SWPPP does not have any past Industrial Operations.

Former Industrial Operations: ☐ Yes ☒ No

Description of Former Industrial Operations: N/A

Historic Contamination: ☒ Yes ☐ No

The following contaminants are known to exist at the project site locations identified:

- Unregulated Earth Material Containing Lead
- Regulated Material Containing Aerially Deposited Lead
- Treated Wood Waste
- Yellow Thermoplastic Traffic Stripe

Unregulated earth material containing lead is present on the job site at the following locations:

| Location | Element of Work | Depth |
|---|---|---|
| Sta 417+13 to Sta 457+50 Rt | Place HMA Dike | 0.5' |
| Sta 418+03 to Sta 457+50 Lt | Place HMA Dike | 0.5' |
| Sta 562+20 to Sta 592+60 Lt | Place HMA Dike | 0.5' |
| Sta 563+09 to Sta 592+60 Rt | Place HMA Dike | 0.5' |

Lead is typically found within the top 2 feet of material within the highway. Reuse all of the excavated material on the right-of-way. Handle the material under all applicable laws, rules, and regulations, including those of the following agencies:

1. Cal/OSHA
2. CA RWQCB, Region 2, San Francisco Bay
3. Bay Area AQMD
4. CA Department of Toxic Substance Control

Type Z-0 material exists from the surface to below the existing grade as shown and listed in the following table:

| Location | Element of Work | Depth |
|---|---|---|
| Sta 474+25 to Sta 483+58 Rt | Place HMA Dike | 0' to 2' |
| Sta 478+37 to Sta 481+36 Lt | Place HMA Dike | 0' to 2' |
| Sta 504+17 to Sta 505+25 Lt | Place HMA Dike | 0' to 2' |
| Sta 546+89 to Sta 563+85 Lt | Place HMA Dike | 0' to 2' |

Manage regulated material containing ADL under the rules and regulations of the following agencies:

1. US Department of Transportation
2. US EPA
3. California Environmental Protection Agency
4. CDPH
5. DTSC
6. Cal/OSHA
7. California Department of Recycling and Recovery
8. California Air Resources Board
9. RWQCB, Region 2, San Francisco Bay
10. Bay Area AQMD
11. CA Department of Toxic Substance Control

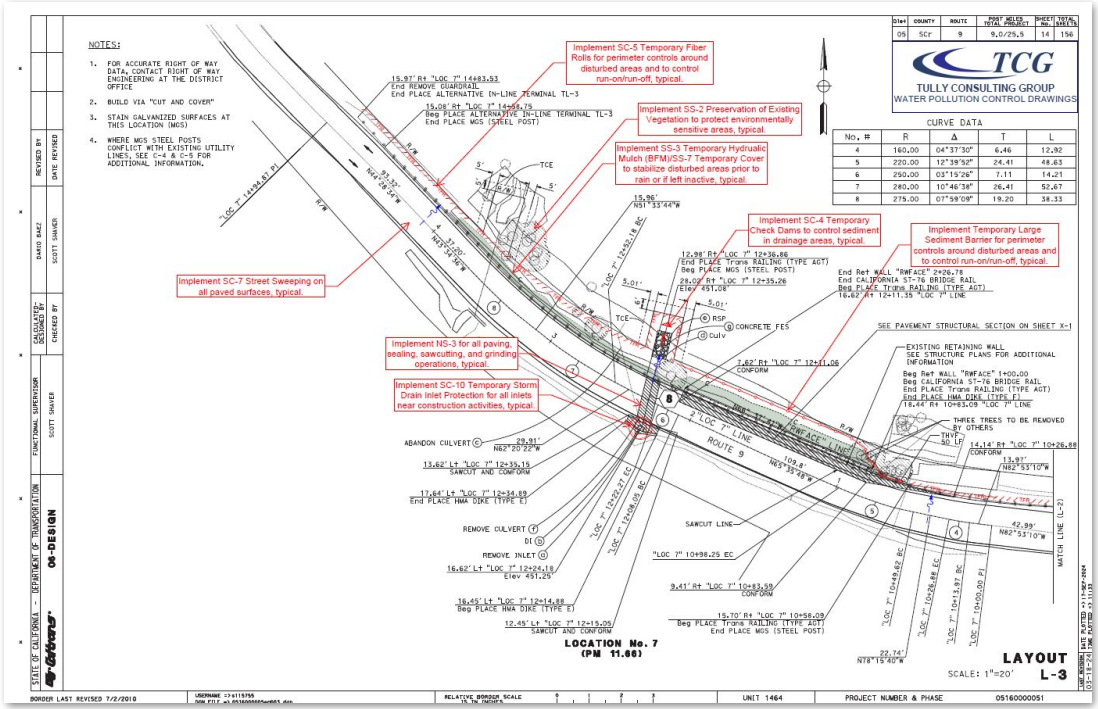
This project includes removal of yellow painted traffic stripe and yellow thermoplastic traffic stripe that will produce hazardous waste residue. After the Engineer accepts the analytical test results, dispose of yellow thermoplastic and yellow paint hazardous waste residue at a Class 1 disposal facility located in California 30 days after accumulating 220 lb of residue. If less than 220 lb of hazardous waste residue and dust is generated in total, dispose of it within 30 days after the start of accumulation of the residue.

Wood removed from guardrail and roadside signs are treated wood waste.

Refer to Sections 7 and 14 of the Contract Documents for additional handling and disposal requirements of contaminated materials.

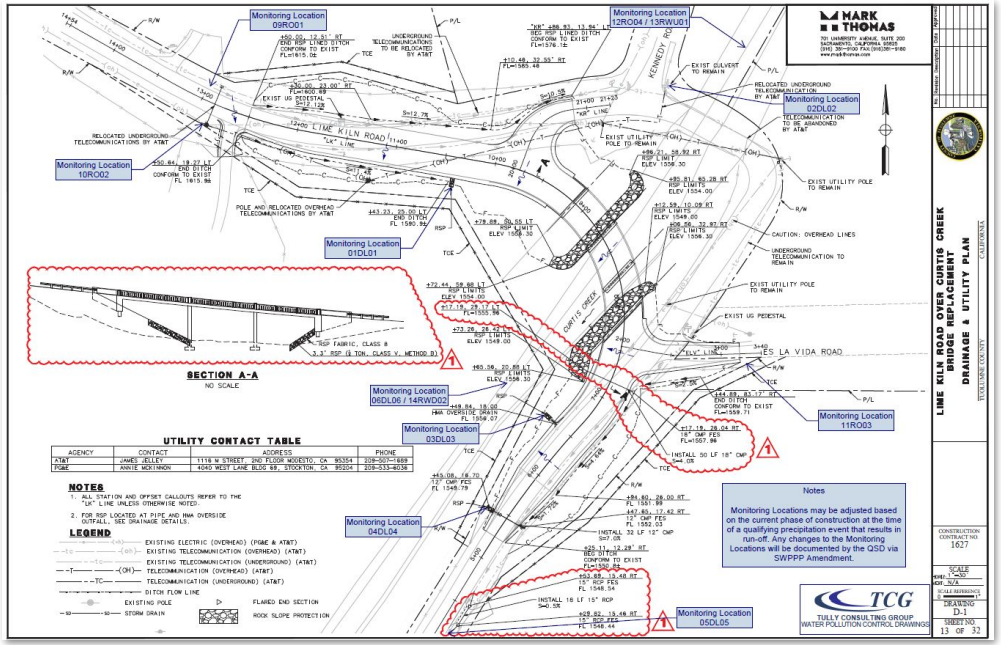
# SWPPP Development

- Place BMPs on the project plans where necessary



# SWPPP Development

- Place monitoring locations for:
  - Run-off locations
  - Run-on locations
  - Receiving water locations
  - Non-Visible pollutant sampling
  - Dewatering locations
  - Stormwater containment areas
  - Monitoring locations required by the Regional Water Quality Control Board



# Open Lines of Communication

- Provide notes about project to inspectors prior to initial inspection
- Ensuring QSP/QSD get a copy of the approved SWPPP prior to project
- QSP/QSD will contact contractor to arrange an initial inspection to consult project
- Ensuring accurate start date (Need time stamped photos for COI to adjust project start date)

# Open Lines of Communication

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April 18, 2024

Jonathan Woo
City of Half Moon Bay
501 Main Street
Half Moon Bay, CA 94019

RE: Poplar Street Traffic Calming & Safety Phase 1 – SWPPP Amendment #1

Mr. Woo,

The purpose of this amendment is to update the project SWPPP with the following information:

1. Due to unforeseen delays, the original project start and end dates need to be updated. Please see Attachment 1 for photos demonstrating no construction activity has taken place. The revised project dates are:

   Project Start: April 22, 2024
   Project End: November 10, 2024

2. The project rainfall erosivity factor (R-Value) has been recalculated and is attached below. This recalculation has not resulted in a change to the project risk level. See Attachment 2 for calculations.

Please feel free to contact us if you have any questions.

Thank you,

Robin Tully, PE, QSP, QSD

Karen Tonks, Compliance Assistant

**Poplar Street Traffic Calming & Safety Phase 1**
**WDID 2 41C402841**
**COI Photos April 15, 2024**

No construction activities have begun; thus, the project start and end dates are being revised via this amendment.









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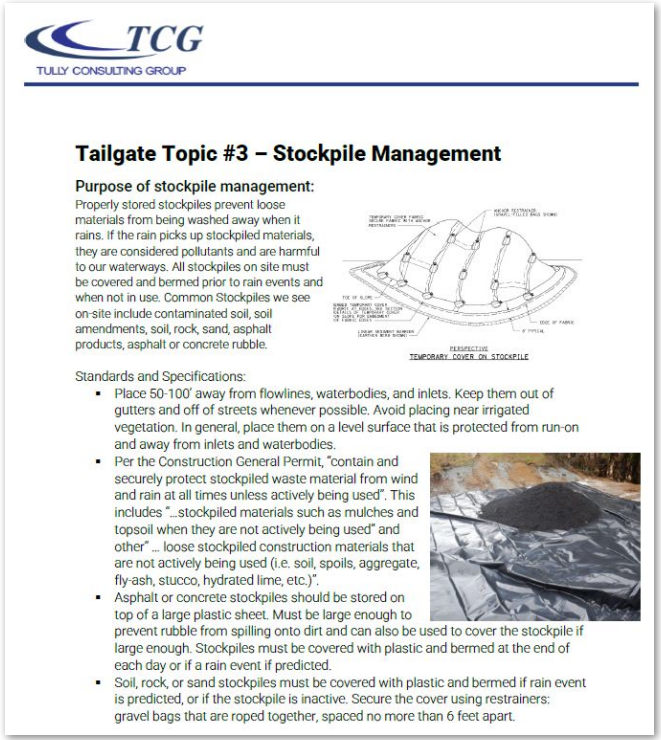
# Keeping SWPPP Alive During Construction

# Keeping SWPPP Alive during construction

- Per the 2022 Construction General Permit (CGP): *“ Dischargers shall post their site-specific WDID number in a site location that is viewable to the public or readily available upon request if unable to post publicly.”*
- Water pollution control drawings available within QR poster for any necessary field changes

# On-going SWPPP Trainings

- Ensure initial SWPPP training is completed
- Implement weekly SWPPP trainings as necessary
- Any Specific Requirement
  - Fueling/ maintenance/ washing areas, distance from waterway, ESA areas, etc.



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**Tailgate Topic #3 – Stockpile Management**

**Purpose of stockpile management:**

Properly stored stockpiles prevent loose materials from being washed away when it rains. If the rain picks up stockpiled materials, they are considered pollutants and are harmful to our waterways. All stockpiles on site must be covered and bermed prior to rain events and when not in use. Common Stockpiles we see on-site include contaminated soil, soil amendments, soil, rock, sand, asphalt products, asphalt or concrete rubble.

PERSPECTIVE
TEMPORARY COVER ON STOCKPILE

Standards and Specifications:

- Place 50-100' away from flowlines, waterbodies, and inlets. Keep them out of gutters and off of streets whenever possible. Avoid placing near irrigated vegetation. In general, place them on a level surface that is protected from run-on and away from inlets and waterbodies.
- Per the Construction General Permit, "contain and securely protect stockpiled waste material from wind and rain at all times unless actively being used". This includes "...stockpiled materials such as mulches and topsoil when they are not actively being used" and other" ... loose stockpiled construction materials that are not actively being used (i.e. soil, spoils, aggregate, fly-ash, stucco, hydrated lime, etc.)".
- Asphalt or concrete stockpiles should be stored on top of a large plastic sheet. Must be large enough to prevent rubble from spilling onto dirt and can also be used to cover the stockpile if large enough. Stockpiles must be covered with plastic and bermed at the end of each day or if a rain event if predicted.
- Soil, rock, or sand stockpiles must be covered with plastic and bermed if rain event is predicted, or if the stockpile is inactive. Secure the cover using restrainers: gravel bags that are roped together, spaced no more than 6 feet apart.

# Ensure Proper QSD Inspections Occur:

- Per the CGP, the QSD shall perform the following on-site visual inspections:
  - Within 30 days of construction activities commencing on a site;
  - Within 30 days of a discharger replacing the QSD;
  - Twice annually, once August through October and once January through March;
  - Within 14 calendar days after a numeric action level exceedance;
  - Within the time period requested in writing from Water Board staff.

# Ensure Proper QSP Inspections Occur:

- Per the CGP, the QSP shall perform the following on-site visual inspections:
  - Once every calendar month;
  - Within 72 hours prior to a forecasted QPE to inspect areas of concern to verify the status of any deficiencies, BMPs, or other identified issues at the site. (Can be up to 120 hours);
  - Within 14 days after a NAL exceedance the QSP shall visually inspect the drainage area of exceedance and document any areas of concern; and
  - Prior to the submittal of General Permit Notice of Termination or Change of Information (for acreage changes) of all or part of a site.

# QSP and QSD Changes in Field

- QSP and QSD will work together through the life of the project
- Checks and Balances

**Table 1-1 List of Changes to be Field Determined**

| Candidate changes for field location or determination by QSP (1) | Check changes that can be field located or field determined by QSP |
|---|---|
| Increase quantity of an Erosion or Sediment Control Measure | X |
| Relocate/add stockpiles or stored materials | X |
| Relocate or add toilets | X |
| Relocate vehicle storage and/or fueling locations | X |
| Relocate areas for waste storage | X |
| Relocate water storage and/or water transfer location | X |
| Changes to access points (entrance/exits) | X |
| Change type or location of Erosion or Sediment Control Measure | |
| Minor changes to schedule or phases | |
| Changes in construction materials | |

*(1) Any field changes not identified for field location or field determination by the QSP must be made as an amendment by the QSD.*

# QSD Initial Inspection

**QSD Checklist**

Project Name: _____

Contractor: _____

Risk Level: _____

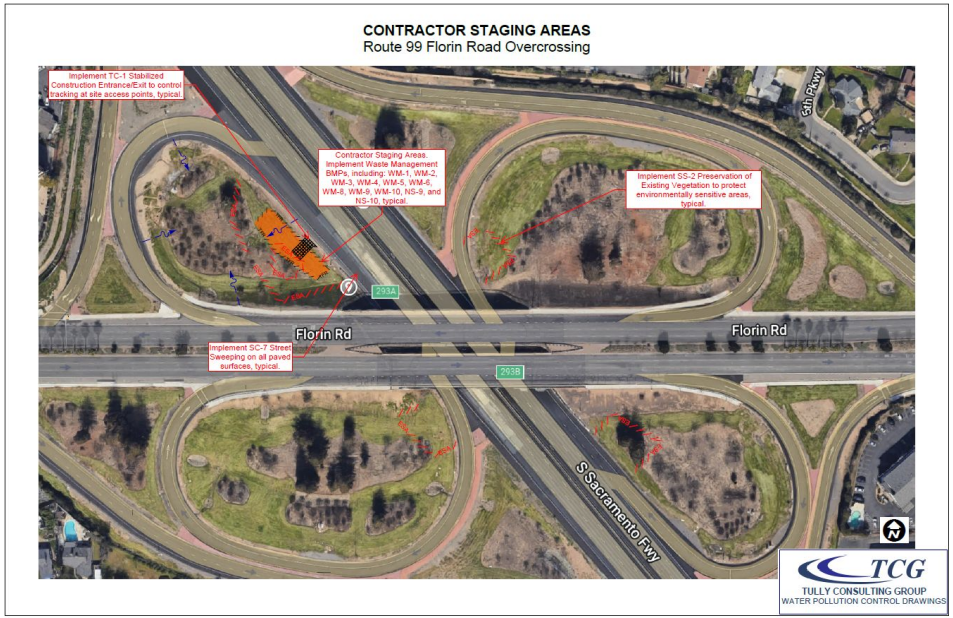
Designated QSP: _____

| Items Reviewed | Acceptable | Needs Action | Notes |
|---|---|---|---|
| WDID Issued | | | |
| ➢ Designated Permit End Date Accurate | | | |
| Required Onsite Documents | | | |
| Current QR Code with Project Name, WDID, and link to SWPPP | | | |
| ➢ QSP Listed for WPCM | | | |
| ➢ Field QSD amended | | | |
| ➢ Active Certifications | | | |
| ➢ Accurate Personnel Lists | | | |
| WDID Number in Cloudcompli and on Reports | | | |
| WPCDs Available and Up to date with Current Site Conditions | | | |
| ➢ Staging Area designated within WPCDs and currently updated via amendments | | | |
| Rain Gauge Onsite | | | |
| Spill Plan Available | | | |
| Spill Kit Available/ Tailgate Spill Prevention | | | |
| Onsite BMPs | | | |
| Good Housekeeping Onsite<br>➢ Materials Properly Stored<br>➢ Covered Secondary Containment for all chemicals | | | |
| ➢ Waste Bins Covered/Leak Proof<br>➢ Paving Equipment on Plastic | | | |
| Tracking Controls<br>➢ Visible Track out<br>➢ Regular Maintenance for Entrances/Entrances | | | |
| Sediment/Perimeter Controls<br>➢ Properly Installed<br>➢ Maintained | | | |
| Erosion Control for DSA Areas<br>➢ DSA Areas are reasonable for current Phase<br>➢ Inactive Areas Stabilized | | | |
| Wind Erosion/Dust Controls<br>➢ Visible Dust<br>➢ Leaking Water Trucks | | | |
| Visible Discharges and/or Spills<br>➢ Properly Disposed of<br>➢ Clean up immediately<br>➢ Use drip protection for equipment maintenance | | | |
| Stockpile Management<br>➢ Cover/berm when not in use | | | |
| Concrete Waste Management<br>➢ Proper washout techniques are being used<br>➢ Waste is contained and picked up | | | |
| Do the site BMPs match what is shown in the SWPPP or do the BMPs need to be revised in the SWPPP? | | | |
| Are BMPs in need of maintenance? | | | |
| Inspection Reports | | | |
| ➢ On File and Up to Date | | | |
| ➢ Is QSP properly documenting deficiencies? | | | |
| ➢ Is the contractor addressing corrective actions by initiating the work within 72 hours? | | | |
| ➢ Monthly Inspections Complete? | | | |
| ➢ Are Storm Inspections Accurate? | | | |
| ➢ Reports are filled out thoroughly and updated frequently with changing site conditions. | | | |
| Weather Reports | | | |
| ➢ Pulled for actual work location | | | |
| ➢ Pulled daily for Caltrans jobs | | | |
| Sampling Reports | | | |
| ➢ On File and Up to Date | | | |
| ➢ Are samples being taken for each qualifying rain event? | | | |
| ➢ Are Sampling Points Accurate with the SWPPP? | | | |
| Annual Reports | | | |
| ➢ Updated to the last quarter | | | |
| ➢ All data needed for annual is being collected. Rain data, sampling, corrective actions, exemptions, etc. | | | |
| Adhocs/NAL Exceedances | | | |
| ➢ Uploaded in SMARTS | | | |
| ➢ NALs Certified Within 10 days | | | |
| Training Records | | | |
| ➢ Initial SWPPP Training | | | |
| ➢ Weekly Training Tailgates | | | |
| Designated QSP with Reasonable Presence at Site | | | |

# Keeping SWPPP Alive During Construction via Amendments

# Amendments Requiring SMARTs COI:

- Keeping the WPC schedule up to date
  - Extend end date
  - Potential increase in risk level (Could constitute writing a new SWPPP)
- Added acreage/ scope of work
- Contractor support facilities adding/ removing

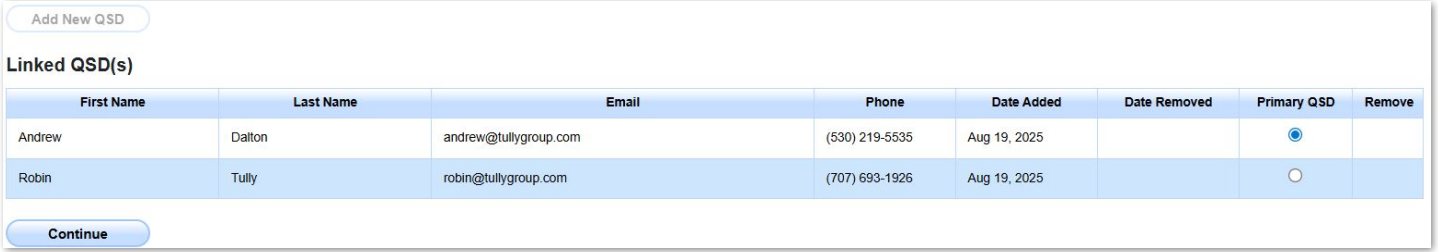


# Amendments Requiring SMARTs COI (Inactive Status):

- If Construction Activities will be suspended for 30 days or more:
  - Revised Site Map showing current project status
  - Photos showing Temporary Stabilization BMPS
  - Upon Water Board approval Sampling may be suspended and inspections may be reduced
  - Another COI is necessary to reinstate the active status
  - QSD Visit within 14 days of COI approval
  - Implement inspections per the CGP
  - Inactive Status can be a timely process


# Additional Amendments:

- Personnel Changes
  - QSD changes require the LRP to edit the QSD within the SMARTS NOI application
- Keeping up to date drawings on-site
- Update monitoring locations
- Additional BMPs if ever required

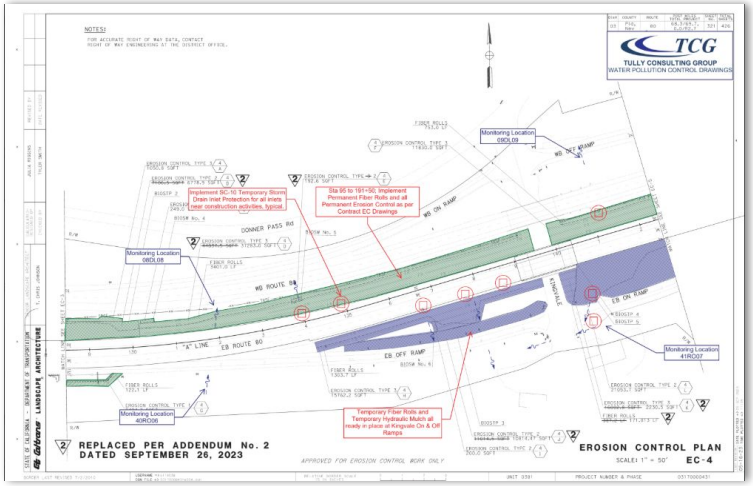


# Winterization Amendments:

- Per Caltrans 2024 Standard Specifications 13-3.01C(2)(a) General:

  The annual winterization plan must describe the preparation for the upcoming rainy season including:

  - Updated schedule
  - Materials and labor
  - Management of stormwater through the job site including:
    - Run-on
    - Run-off
    - Conveyance downslope



# Winterization Amendments (Continued):

- Management of areas within the job site including:
  - Areas where work is suspended, Areas of soil stabilization, New disturbed soil areas
- Changes to monitoring locations
- Slope stabilization
- Management of dewatering discharges

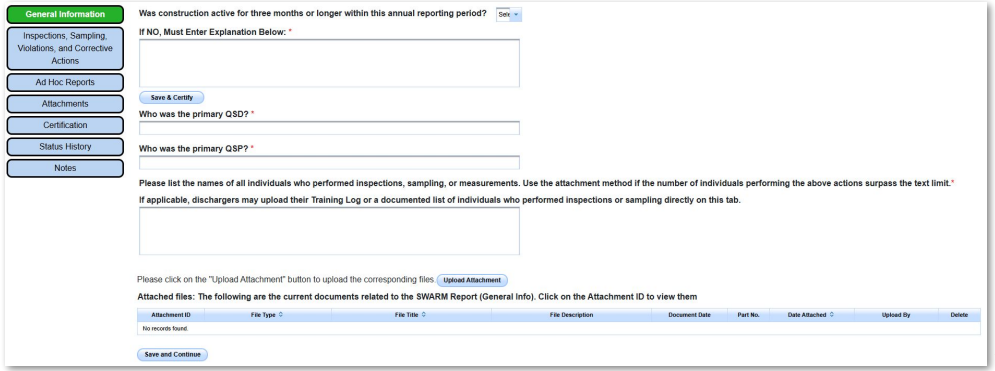
# Dewatering

- Dewatering may become necessary if groundwater or ponded Stormwater is encountered
  - You may need a separate permit/ plan depending on what type of water, quantity of water, potential contaminants, and where you are discharging the water
  - May require communication with the Regional Water Board
  - Additional monitoring **may** be required


# Annual Reports

# Annual Reports

- Upload Annual Report
  - Due in SMARTS by September 1st for the previous reporting period from July 1st through June 30th if a WDID number is active for at least 90 days within the reporting period.
  - Fill out the required annual report spreadsheet
  - We recommend quarterly check-ins



# NOT and Closing Projects Out

# NOT and Closing Projects Out

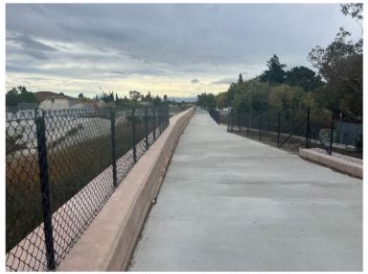
- Upload final annual report in SMARTs
- Establish 70 percent stabilization throughout the project
- Permanent BMPS in place per contract documents
- Post construction documentation
- Final site maps and photos
- Upload NOT in SMARTs for certification
- Continue inspections until NOT approval

# NOT and Closing Projects Out

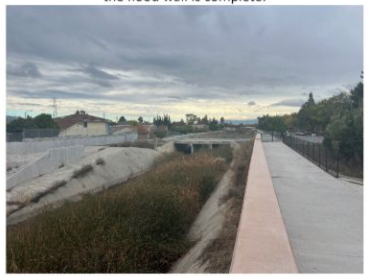
LOWER PENITENCIA CREEK IMPROVEMENTS

Notice of Termination Photo Report

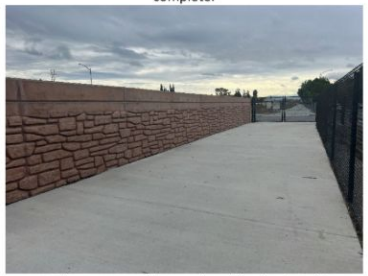
#1 The access road is paved; the shoulder is stabilized and the flood wall is complete.



#2 The access road is paved and the flood wall is complete.

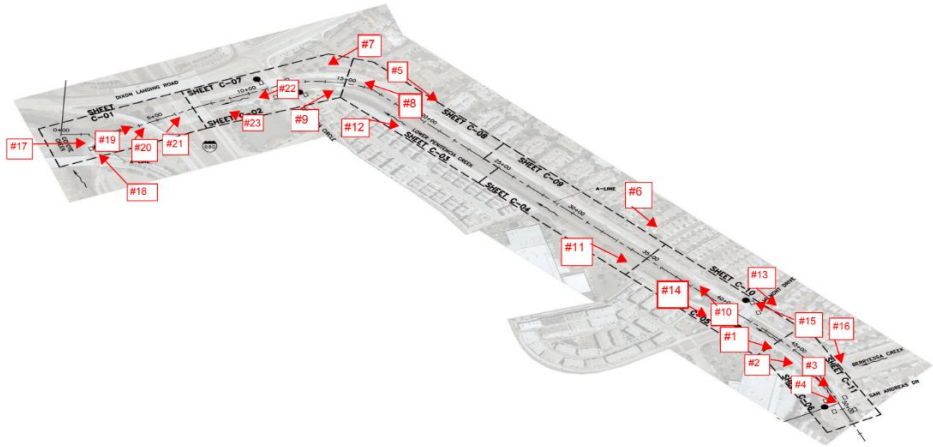


#3 The access road is paved and the flood wall is complete.



#4 The access road is paved and the flood wall is complete.

LOWER PENITENCIA CREEK IMPROVEMENTS
WDID #: 2 43C394686




| TCG TULLY CONSULTING GROUP 1650 N. Lincoln Street, Suite A Dixon, CA 95620 (707) 693-1926 www.tullygroup.com | Lower Penitencia Creek Improvements | NOTICE OF TERMINATION | NOT TO SCALE |
|---|---|---|---|

# Questions?

Feel free to contact us at

Submittals@tullygroup.com

707-693-1926

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