



Construction Site Runoff Control Environmental Results Program for MS4's

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Problem Statement

- Construction Site Runoff Control is one of 6 minimum control measures required by DEM for operators of MS4's (Municipal Separate Storm Sewer System)
- 34 RI municipalities involved and must comply with DEM General Permit as developed under Phase II Final Rule
- Required to develop, implement and enforce program to mitigate stormwater runoff pollution
- All construction sites >1 acre in their jurisdictions are required to be inspected
- Lack of resources at federal, state and local levels makes it difficult for MS4's to comply

Project Goals

- Help stressed MS4 operators comply with new permit conditions to inspect sites and enforce stormwater runoff control
- Utilize ERP approach for all construction sites >1 acre to develop program for MS4 operators by using checklist and analyzing results with statistically-based inspections
- Mandatory self-certification from each construction site will fulfill requirement for 100% inspection rate

Major Activities

Task	Status
Develop checklist that incorporates BMP's and other permit requirements	Completed
Universe Evaluation and Data Management	Completed
Baseline Determination	Completed
Conduct Baseline Inspections (80 construction sites)	On Going
Revise General Permit to Include Self-certification	On Going
Develop Stakeholder Group	Future
Distribute Checklists	Future
Develop and Conduct Training Workshops	Future
Conduct Post-Certification Inspections	Future
Statistical Data Analysis and Performance Evaluation	Future

Checklist Packet

- Main components include:
 - Compliance Certification Checklist
 - Certification Statement
 - Return to Compliance Form
- Also includes BMP's to help prevent significant erosion
- Similar to other checklists developed for other industry sectors like autobody and auto salvage
- Sections include information about the storm water runoff regulations and description of self-certification process

Checklist, cont

Environmental Compliance Certification Program

Self-Certification Checklist and Forms Booklet

For

Storm Water Construction Permits



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Checklist, cont

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Checklist Sample

Section B: Permit Conditions Checklist

(Refer to Part II in the General Permit, p. 4)

B.1 Do you have a copy of the Storm Water Pollution Prevention Plan (SWPPP) on site at all times?

Yes No - Submit RTC NA

B.2 At least once every 7 days and within 24 hours after significant rain events (>0.25 inches/day), do you inspect all storm water control measures, disturbed areas, areas used for the storage of materials, discharge locations where vehicles enter or exit the site?

Yes No - Submit RTC NA

B.3 If site inspections identify and recommend changes to the SWPPP, has the SWPPP been updated to reflect those recommendations?

Yes No - Submit RTC NA

Self-Certification Requirements

- Owner/Operator responsible for complying with all pertinent regulations
- Complete and submit forms to DEM including checklist, certification statement and any return-to-compliance forms
- Self-certification does not replace or supersede requirements of General Permit
- Self-certification does not prevent regulatory inspection though helps to prepare for any unannounced inspection

Example Inspection Observations

Gravel Requirement for Entrance/Exit Access



Before (during inspection)



After (corrected)

Example Inspection Observations

Hay Bale/Silt Fencing



Before (during inspection)



After (corrected)

Example Inspection Observations

Storm Drain Protection



Before (during inspection)



After (corrected)

Example Inspection Observations

Other BMP's



Before (during inspection)



After (corrected)

Preliminary Evaluation

- Sometimes difficult to “catch” construction projects in progress since inspections have to be unannounced
- Contractors and owners not aware of all pertinent regulations
- Communication among managers, engineers and work crew not good in terms of delegating responsibilities and adjusting BMP's to changing work conditions
- ERP training should help to better educate contractors for proper compliance