

STORMWATER UPDATE

In This Issue

- ❖ Frequently Asked Questions
- ❖ Organization
- ❖ Training Update
- ❖ Winter Is Coming

EIT / EMT Training Upcoming Dates

KSU Salina CIT Program

<http://citksu.com>

March 21-22

March 23-24

May 9-10

May 11-12

June 13-14

June 15-16

Kansas Contractors Association

<http://www.kansascontractors.org/>

February 10-11

March 8-9

WPCMs are required to have completed both the EIT and the EMT courses within the 12 months prior to beginning work on a project or being designated as WPCM for a project.

All completed inspection reports must be submitted to the responsible Area Engineer and the contractor's WPCM within 24 hours of each inspection. The Area Engineer must sign within 3 calendar days and submit to stormwaterinspection@ksdot.org. Failure to complete and submit inspection reports on time **will** result in penalties

Frequently Asked Questions

I've answered a lot of questions over the last few years. That's only natural, as many of our stormwater pollution prevention requirements and procedures have changed significantly over that time. Here are a few of the more common questions and answers.

Q: When do my compliance responsibilities such as inspections, WPCM visits and BMP installation/maintenance begin and end?

A: Stormwater compliance responsibilities on most projects begin with the Notice to Proceed. For contractors, the responsibilities to provide a WPCM, participate in the joint inspections and maintain BMPs end with issuance of the Notice of Acceptance. These responsibilities can also end with a partial Notice of Acceptance provided that **all** physical work is complete. For KDOT, compliance responsibilities end with submission of the Notice of Termination (NOT) to KDHE. The current procedure is that the Area / Metro Engineer submits a request for the NOT to the Stormwater Compliance Engineer (SWCE). If the SWCE concurs then the NOT is submitted as soon as possible.

Q: How much time do I have to complete my temporary stabilization?

A: The more relevant question is: "how much time do I have to **start** my temporary stabilization?" The permit and the specification requirement is that stabilization measures be initiated **immediately** after construction activities have ceased on any portion of the site. This applies for areas that are finish graded as well as for temporary stoppages in excess of 14 days (7 days for steep slopes.) Beginning stabilization work within one working day of ceasing grading operations is considered to be "immediately" in this context.

Q: We just had a rainfall event requiring an inspection. Should I reset my 14-day inspection cycle?

A: No, we should maintain the scheduled routine inspections whenever possible. Routine inspections can be re-scheduled to avoid holidays or for other reasons as long as the time period between inspections never exceeds 14 days.

Q: Do I have to perform an inspection following a 0.5" snow event?

A: No, inspections following snow events are not required. The 14-day inspection cycle should be maintained. If the site is covered in snow the inspection should be completed and the site conditions documented. It is not expected that stormwater BMPs be exposed for close inspection. Visible concerns should be documented according to standard procedure and pictures are always recommended.

Q: What is the procedure for an Oversight Inspection?

A: Oversight inspections are similar to a routine project inspection with a few significant differences. Oversight inspections are not "joint inspections." They are signed and certified by only the oversight inspector. The KDOT inspector, Contractor Inspector, WPCM and/or Area Engineer are usually welcome to accompany the oversight inspector but their presence during the inspection is not required. These inspections are required to be unannounced and occur no greater than 60 days apart during the interval from Notice to Proceed and Notice of Acceptance. The inspection report is required to be sent to the Area Engineer and the WPCM for the project within 24 hours of the inspection. The AE and WPCM should sign to verify they have received and reviewed the report. The oversight inspection findings are required to be addressed in a timely manner. This can best be accomplished by ensuring any findings which have not been addressed are included in the next project-level routine or post-event inspection.

“Organization is what you do before you do something, so that when you do it, it’s not all mixed up.” – A.A. Milne

Life is full of competing demands for our attention. In order to be successful, it is imperative that we develop strategies for prioritizing and organizing ourselves to meet all of our various obligations. It is often easy to allow one-time or infrequent large tasks to distract us from the routine items we are asked to manage on a daily basis. On the other hand, some of us get so busy with the day-to-day that it becomes difficult to meet deadlines or milestones on the large tasks. We may also see a struggle between our professional duties and obligations in our personal lives. Finding the right balance between these competing interests is a key to managing stress in our lives.

The more obligations we have, or the more complex tasks we have to manage, the more important our organizational strategy becomes. Planning ahead is one strategy to help us maintain organization. An inspector who doesn’t spend time studying and becoming familiar with the construction plans for a project will be unprepared and possibly overwhelmed with unexpected tasks. The same is true with the SWPPP. In order to be properly prepared to manage our stormwater tasks on a project we need to know what those tasks are and when they are expected. A contractor’s WPCM who is unfamiliar with the plan will struggle to maintain permit compliance and puts their employer at risk of contract disincentives and penalties. A KDOT inspector or engineer who is unprepared may give a contractor incorrect guidance or fail to properly report and act on potential violations which puts KDOT at risk for additional penalties.

This doesn’t mean that we need to memorize every minute detail of the plan, but we are obligated to be familiar with it. The level of familiarity should vary according to the various SWPPP elements. Basic strategies for prosecuting the work, general sequences of operations, standard BMP installation or maintenance requirements and similar broad compliance strategies should be known to all responsible persons on each project. Specific details such as dewatering procedures, stream crossings or other infrequent items can be looked up as needed on the project. What is needed in those cases is an awareness of the concern and the ability to quickly find the relevant requirements in the SWPPP. This is comparable to general construction inspection, where we are not expected to memorize every detail of the standard specifications, construction manual and special provisions. What we are expected to do is to know the fundamental principles and techniques, while being able to efficiently locate the relevant specifications and details as needed.

Sometimes it is easy to overlook the tools that we have right in front of us. The SWPPP is valuable to us not just as a guide for BMP details but as a way to organize the project. Sequencing and scheduling the construction operations is one of the most effective BMPs in our arsenal for maintaining compliance with the permit. Organizing our thoughts and strategies and using the SWPPP to document them helps all members of the project team be on the same page throughout the job.





Training Update

Make sure you review your EIT and EMT certifications and sign up for the appropriate classes to maintain the necessary certifications. Registration for the K-State CIT classes is now open on the program website (<http://citksu.com>).

The Kansas Contractors Association is also sponsoring classes. There are classes scheduled for February 10-11 and March 8-9, 2016. For information regarding enrollment contact the KCA at 785-266-4152.

Any of these classes may be cancelled if the enrollment minimums are not met. Signing up early helps make sure that classes are scheduled to meet the demand.

Winter Is Coming

We are approaching wintertime and many of our projects will be suspended or shut down for extended periods of time. During these shutdowns it is important to remember that our stormwater responsibilities cannot be suspended. The general permit does not allow for a winter suspension and all permit, consent decree and specification requirements remain in effect. This includes the WPCM's weekly project reviews, biweekly SWPPP inspections, Oversight Inspections and BMP maintenance.

As we have already seen this season, winter conditions have the potential to make BMP installation extremely difficult. For this is reason it is imperative that we be proactive and maintain compliance at all times. A delay of even a few days can allow the weather to create significant problems with installation or repair of our pollution prevention measures. It is our responsibility to be aware of forecasted weather events and take the appropriate measures to be prepared for them.



Stormwater Update Online

This issue and all past issues of this quarterly bulletin are available online at KDOT's Stormwater website:

<http://www.ksdot.org/burconsmain/Connections/swppp.asp>

Contact Jason Van Nice (jasonv@ksdot.org) with questions, comments or suggestions for future content.