

STORMWATER UPDATE

Good Housekeeping

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EIT / EMT Training Upcoming Dates

KSU Salina CIT Program

<http://citksu.com>

September 19-20, 2016

September 21-22, 2016

March 27-28, 2017

March 29-30, 2017

May 1-2, 2017

May 3-4, 2017

June 7-8, 2017

Kansas Contractors Association

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

No classes scheduled
2017 Dates TBA

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.

The requirements for stormwater pollution prevention cover a wide range of issues on our construction projects. The primary pollutant of concern is sediment coming from erosion of exposed soil so it is understandable that erosion control get most of our attention. However, to have a compliant SWPPP we must also include BMPs to address the "other pollutants" related to construction sites.

Part 7.2.9 of the KDHE General Permit addresses "Additional Site Management BMPs." Permittees are required to include practices which address equipment washing, material storage and waste management. What the permit does not provide is significant guidance as to what these BMPs might actually consist of. We, as SWPPP developers, stormwater managers or site inspectors must determine what is the appropriate BMP selection for our particular site and the particular operations necessary for the completion of our project.

In the area of waste management, for example, a common BMP is the placement of a covered dumpster on the project site. This is certainly a good practice and is strongly recommended on many projects it is not necessarily appropriate on every project or even for the entire duration of a particular project. Much of our construction work generates small volumes of trash that can be effectively managed by simply bagging it up and hauling it offsite.

The requirement to store construction materials away from drainage courses and low areas is also requires careful, site-specific consideration. Storage locations should be identified in the SWPPP. This requires taking into account what materials are required, anticipated storage time and how they will be accessed for both delivery and use in the project. Storage locations may need to be adjusted in the field but clear guidance should be given in order to avoid exposing potential pollutants to excess stormwater runoff.

One BMP that, in my opinion, should **always** be included is basic training of the project staff. Having 100 covered dumpsters on site or a trash bag in every piece of equipment serves no purpose if the workers are not informed. Every person working on a project, whether KDOT, Contractor, consultant or LPA has a role in maintaining permit compliance. Making sure everyone understands their role and their responsibilities should be an objective for every project manager.



FAQ – When to Stop Inspections

As we approach the end of the construction season many of our projects are beginning to wrap up. Some of you have been asking question about ceasing inspections and WPCM duties. The WPCM requirements come from the Consent Decree and are incorporated into the specifications. The current special provisions 15-PS0360-R1 and 15-9002-R1 both include the following:

Designate a Water Pollution Control Manager (WPCM) who shall visit the project during normal work hours on a frequent basis and at least once per week until all physical work is complete and the Engineer issues the Notice of Acceptance or a partial Notice of Acceptance. The required 180 day observation period for pavement markings is not considered to be physical work.

Both special provisions also include similar language requiring the contractor to participate in routine and post-event site inspections:

KDOT's Inspector and the Contractor's Environmental Inspector shall perform a joint inspection of the temporary erosion and pollution control devices every 14 days during normal work hours and within 24 hours of a rainfall event of ½ inch or more. Continue inspections at this frequency until all physical work is complete and the Engineer issues the Notice of Acceptance or a partial Notice of Acceptance. The required 180 day observation period for pavement markings is not considered to be physical work.

Note that there are two conditions which must be met in order to terminate the Contractor's responsibility to provide a WPCM and to participate in the joint inspections. First the Contractor must have completed all "physical work" on the project. "Physical work" includes major items like grading or paving as well as other items such as placing pavement marking, installing signs or permanent seeding. The required 180 day observation period for acceptance of pavement marking is not considered to be physical work on the project. The second requirement is that the Contractor be given Notice of Acceptance (or partial Notice of Acceptance.) If both requirements are not met then the Contractor is required to continue with both the inspection and the WPCM requirements.

Once the Contractor has been released the inspection and maintenance of the project remains the responsibility of the owner (KDOT or LPA depending on the project). This responsibility extends until submittal to KDHE of the Notice of Termination as described in the permit. Terminating permit coverage is allowed once all project work is complete and the disturbed areas have been permanently stabilized. Areas are considered permanently stabilized once they have been paved, covered with riprap, or vegetated with perennial vegetation at 70% density (relative to undisturbed areas at or near the project site).



Training Update

The classes scheduled for September 19-20 and September 21-22 will be held as planned. There was concern that low enrollment would lead to cancellation of one session but registrations have been sufficient to warrant two classes. These will be the last training opportunities in 2016.

There is still space available in both sessions. Registration is online, visit <http://citksu.com> for details. Registration for the spring classes will open on September 12, 2016.

Everyone should review their recertification dates and enroll in the appropriate classes to ensure the certifications do not lapse.



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) for questions, comments or suggestions for future content.