

Complying with the California Construction Storm Water General Permit A Primer to the Recent Permit Revisions

Presented by:
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- California Construction Storm Water General Permit (CGP)
 - Background/Applicability
 - Recent Revisions to CGP
 - CGP Clarifications
- Questions????

A high-speed photograph of a water droplet falling into a pool of water, creating a series of concentric ripples. The background is a deep blue gradient.

California Construction Storm Water General Permit

- CGP Background
 - National Pollutant Discharge Elimination System Permit
 - Basic Timeline
 - Prior General Permit expired in 2004; administrative extension
 - Revised permit adopted September 2, 2009
 - Revised permit effective July 1, 2010

- CGP Applicability
 - Construction or demolition activity resulting in land disturbance of equal to or greater than one acre (or less than 1 acre if part of a common plan of development)
 - Construction activity related to residential, commercial, or industrial development on agricultural lands
 - Construction activity associated with Linear Utility Projects
 - Construction activities associated with oil and gas exploration
 - Discharges from dredge spoil placement outside of US Army Corp jurisdiction

Recent Revisions to CGP

1. Risk Based Permitting Approach
2. Rainfall Erosivity Waiver Option
3. Technology Based Numeric Action Levels (NALs)
4. Technology Based Numeric Effluent Limitations (NELs)
5. Compliance Storm Event
6. Active Treatment System Requirements
7. Effluent Monitoring
8. Receiving Water Monitoring
9. Post Construction Requirements
10. Rain Event Action Plan
11. Annual Reporting Requirements
12. Certification and Training Requirements
13. Linear Utility Project Requirements

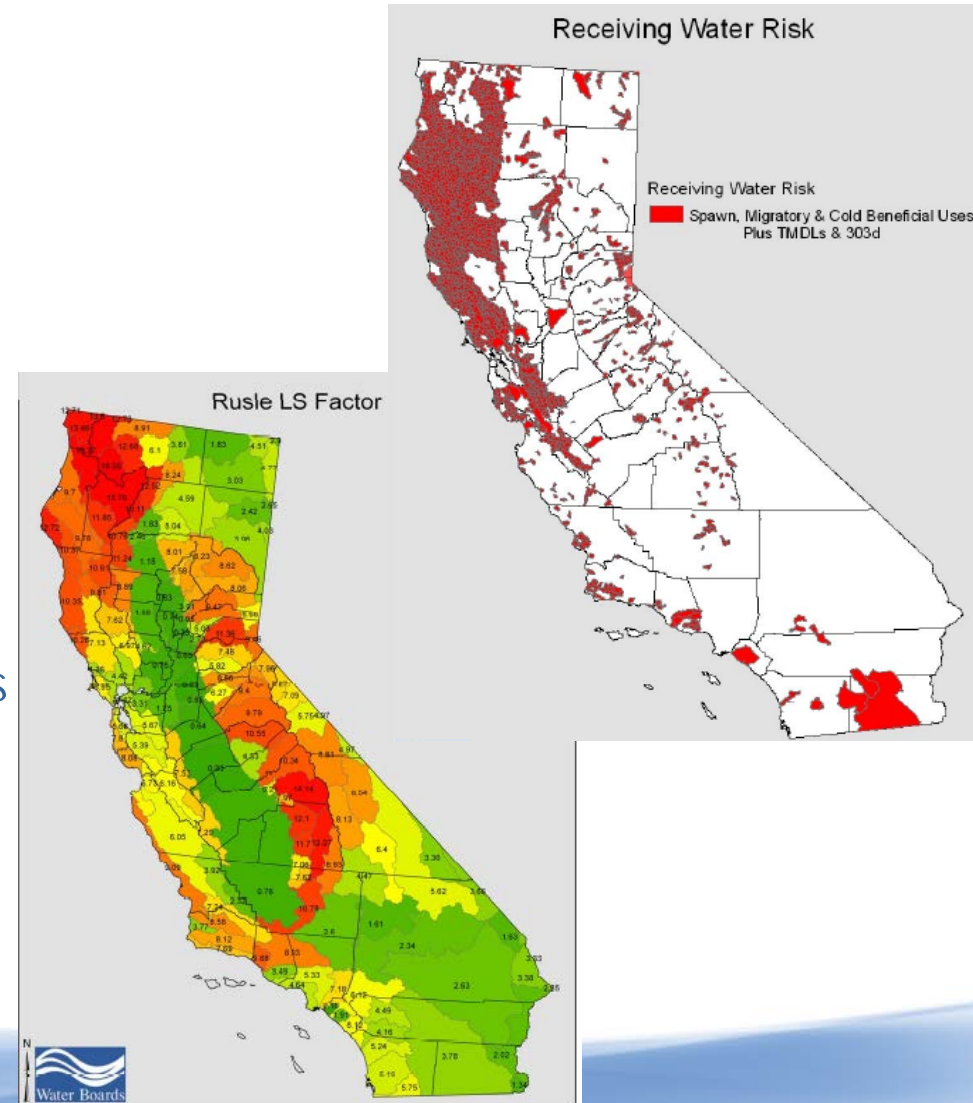
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Recent Revisions to CGP

■ Risk Based Permitting Approach

- Drives BMP selection, numeric limitations, monitoring
- Two Elements of Project Risk:
 - Sediment Risk
 - Revised Universal Soil Loss Equation (RUSLE); $A = (R)(K)(LS)(C)(P)$
 - Receiving Water Risk
 - Sediment Sensitive Waterbodies



- Risk Based Permitting Approach
 - Project Risk Determination

		Project Sediment Risk		
		LOW	MED	HIGH
Receiving Water Risk	LOW	Level 1	Level 2	
	HIGH	Level 2		Level 3

- **Rainfall Erosivity Waiver Option** (i.e. Permit Exemption)
 - Criteria:
 1. >1 and <5 acres, AND
 2. Rainfall erosivity value (R value) less than 5*
 - Certification done through the Permit Registration Document (PRD) process in SMARTS (.
 - **If schedule changes and R value is above 5, must apply for CGP coverage**

Recent Revisions to CGP

- **Technology Based Numeric Action Levels (NAL)**
 - Risk Level 2 and 3 sites:
 - pH NAL = 6.5 – 8.5
 - Turbidity NAL = 250 NTU
 - For an NAL exceedance, the Regional Water Board may require the submittal of an NAL Exceedance Report.



- **Technology Based Numeric Effluent Limitations**
 - Risk Level 3 sites:
 - pH NEL = 6.0 – 9.0
 - Turbidity NEL = 500 NTU
 - For an NEL exceedance: NEL Violation Report submitted within 24 hours after the NEL exceedance identified with:
 - sampling results
 - description of the onsite BMPs, and
 - corrective actions taken

****Permit Establishes a 5 year, 24 hour compliance storm event exception from NEL's****

Recent Revisions to CGP

- **Rain Event Action Plans (REAPs)**
 - Risk Level 2 and 3 sites
 - A QSP must develop the REAP
 - Designed to protect all exposed portions of the site within 48 hours prior to any likely precipitation event. (forecast: 50% or greater probability per NOAA - <http://www.wrh.noaa.gov>)
 - Templates provided by the California Storm water Quality Association (CASQA)



Recent Revisions to CGP

■ Rain Event Action Plans (Cont.)

- Must be developed for all phases of construction
 - Contact info
 - Suggested actions/BMPs
- Must be completed year round
- Inactive sites require a REAP as well

Date: _____ 20____ WDID Number: _____

APPENDIX 3: REAP TEMPLATES

Rain Event Action Plan (REAP)
Grading and Land Development Phase

Preparation of land for utility installation and vertical building including clearing and grubbing, demolition, blasting or rock crushing, if necessary, and soil excavation and mass grading. This form is to be reviewed and completed by the qualified SHPPP practitioner within 48 hours prior to a rain event during the Grading and Land Development Phase.

Site Information:

Site Name, City and Zip Code _____ □ Risk Level 2 □ Risk Level 3

Site Storm Water Manager Information:

Name, Company and Emergency Phone Number (24/7) _____

Erosion and Sediment Control Provider – Labor Force Contracted for the Site:

Name, Company and Emergency Phone Number (24/7) _____

Storm Water Sampling Agent Information:

Name, Company and Emergency Phone Number (24/7) _____

Activities Associated with Land Surface Development
Check ALL the boxes below that apply to your site.

<input type="checkbox"/> Demolition	<input type="checkbox"/> Vegetation Removal	<input type="checkbox"/> Vegetation Salvage-Harvest
<input type="checkbox"/> Rough Grade	<input type="checkbox"/> Finish Grade	<input type="checkbox"/> Blasting
<input type="checkbox"/> Soil Amendment(s):	<input type="checkbox"/> Over Excavation (____ ft)	<input type="checkbox"/> Soils Testing
<input type="checkbox"/> Rock Crushing	<input type="checkbox"/> Erosion and Sediment Control	<input type="checkbox"/> Surveying
<input type="checkbox"/> Equip. Maintenance/Fueling	<input type="checkbox"/> Material Delivery and Storage	<input type="checkbox"/> Other:

Trades Active on Site During Land Surface Development
Check ALL the boxes below that apply to your site.

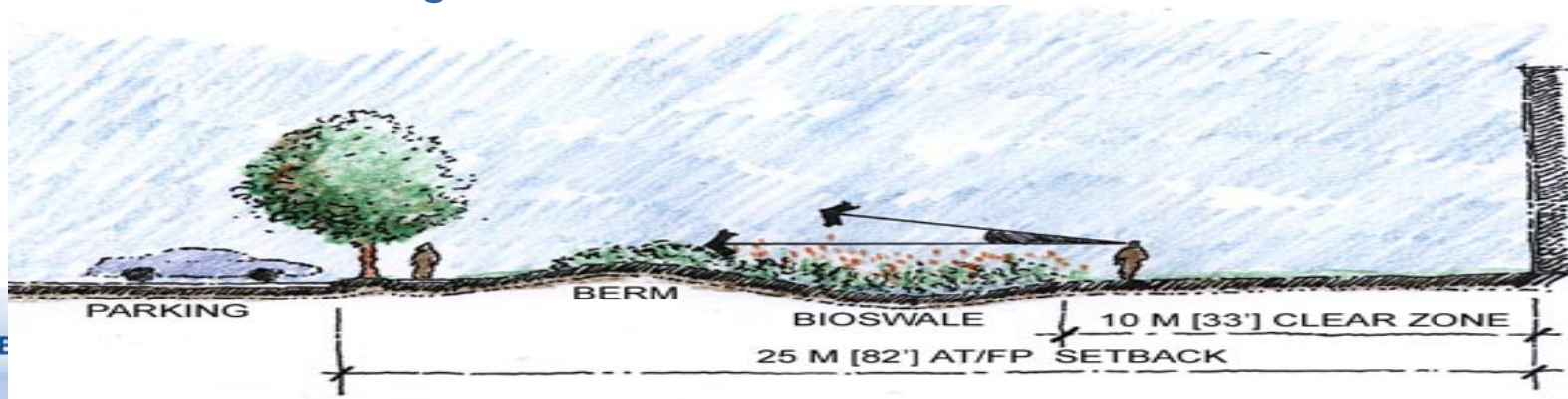
<input type="checkbox"/> Demolition	<input type="checkbox"/> Grading Contractor	<input type="checkbox"/> Erosion and Sediment Control
<input type="checkbox"/> Storm Drain Improvement	<input type="checkbox"/> Water, Sewer, Electric Utilities	<input type="checkbox"/> Surveyor – Soils Technician
<input type="checkbox"/> Street Improvements	<input type="checkbox"/> Rock Products	<input type="checkbox"/> Sanitary Station Provider
<input type="checkbox"/> Material Delivery	<input type="checkbox"/> Equipment Fueling/Maintenance	<input type="checkbox"/> Laborers
<input type="checkbox"/> Other:	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:

Trade Contractor Information Provided

<input type="checkbox"/> Educational Material Handout	<input type="checkbox"/> Tailgate Meetings	<input type="checkbox"/> Training Workshop
<input type="checkbox"/> Contractual Language	<input type="checkbox"/> Fines and Penalties	<input type="checkbox"/> Signage
<input type="checkbox"/> Other:	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:

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- **Post Construction Requirements**
 - Effective 3 years after permit adoption (September 2, 2012)
 - Applies to projects not covered by an active Phase I or Phase II Municipal Separate Storm Sewer System (MS4) NPDES permit that has an approved Storm Water Management Plan



- **Post Construction Requirements (Cont.)**
 - Match Pre- and Post-runoff Volumes
 - Emphasis on Low Impact Development (LID)
 - Calculator in Appendix 2 of CGP
 - Two options to determine the project-related increase in runoff volume :
 1. use the State Water Board spreadsheet; or
 2. Use a more sophisticated, watershed process-based model

- **Certification and Training Requirements**
 - **Qualified SWPPP developer (QSD)** - registrations and certifications listed in Section VII of the CGP by July 1, 2010
 - **Qualified SWPPP practitioner (QSP)** - registrations and certifications listed in Section VII of the CGP by September 2, 2011.
 - BOTH prospective QSD/QSPs must ALSO attend a State Water Board sponsored or approved QSD/QSP training course within two years after the permit adoption date - **September 2, 2011.**
 - Training information: www.CASQA.org

- Is my project really Risk Level X????
 - The State Water Board GIS Map Method for K-L-S factors is NOT site-specific.
 - Highly recommend using site specific Length, Slope and Soil Erodibility (K) factors.
 - Perform a particle size analysis [ASTM D-422] to acquire K factor

- Can LUP Risk Type be recalculated later in the project?
 - *“LUP projects may be broken into multiple LUP type segments during NOI application submittal in SMARTS. Once these segments have been established, and the Types (risk) is determined, they will remain for the life of the project.”*

- What does the “70% final cover method” really mean with respect to final stabilization of a construction site.
 - 70% of disturbed area not built upon must receive some form of final cover (i.e. landscaping, seeding/mulching, etc)
 - Straw mulch, wood mulch, or other forms of cover may be accepted if it is part of the final stabilization design.

- What is the trigger for performing a pre-rain event inspection?
 - *If NOAA forecasts rain with 50% chance or better, inspect within 48-hours of when rainfall is expected to begin.*
 1. Visit the NOAA Website (<http://www.srh.noaa.gov/>)
 2. Enter your zip code or city & state in the search box and click “go”
 3. Scroll down to the bottom right hand of the page under “Additional Forecasts & Information”
 4. Click on “Forecast Weather Table Interface” at the bottom of the section

- What is the trigger for a post-rain event inspection?
 - 0.5" of rainfall
 - Highly recommended you install and monitor a rain gauge at your site
 - If the rainfall total was less than 0.5", there is no need to perform 24-hour or post-rain event inspections.
 - Be sure to document the storm rainfall total on your pre-rain event inspection form so this is clear to the regulator.

QUESTIONS???

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