



CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

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OVERVIEW OF REQUIREMENTS

AGENDA

- Definitions
- Ordinances
- Site Plan Review
- Construction Site Inspection SOP
- Construction Site Inspection: During the Inspection
- Inspection Documentation
- Follow-up Documentation





DEFINITIONS

- “Common plan of development” – A single plan of development or sale for a site where one or more separate and distinct construction activities are occurring on one or more schedules by one or more contractors.
- “CGP” – Construction Generic Permit, an NPDES Permit required for construction sites larger than an acre or part of a common plan of development
- “ERP” – Environmental Resource Permit, a permit issued in Florida by the Water Management Districts for the design of new stormwater systems.



PHASE I

REQUIREMENTS FOR ORDINANCES

Maintain and implement the local codes or land development regulations that require the use and maintenance of appropriate structural and non-structural erosion, sedimentation and waste controls during construction to reduce the discharge of pollutants to the MS4.

- Require the use and maintenance of appropriate erosion, sediment, and waste controls on construction sites
 - At a minimum, for sites that require CGPs:
 - 1 acre or larger OR
 - part of a common plan of development or sale



PHASE II

REQUIREMENTS FOR ORDINANCES

An ordinance or other regulatory mechanism to require erosion and sediment controls, and control of wastes, as well as sanctions to ensure compliance, to reduce pollutants in any stormwater runoff to the MS4 from construction activities that will result in a land disturbance of greater than or equal to one acre AND construction activity disturbing less than one acre if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

- Require appropriate erosion, sediment, and waste controls on construction sites
- Definition of size of construction site that requires ESW controls
 - sites that require CGPs:
 - 1 acre or larger OR
 - part of a common plan of development or sale



SITE PLAN REVIEW

SUMMARY

- Site plans should be reviewed for Erosion, Sediment, and Waste Controls
 - Also referred to as an Erosion and Sediment Control Plan, or a SWPPP
- Review should consist of
 - Ensuring SWPPP is included in site plan submission
 - Review of the BMPs to ensure they are appropriate and deal with the construction activities to be conducted on site
 - Notification of possible CGP/ERP requirements



PHASE II 2003 GENERIC PERMIT

RULE 62-621.300(7)(A), F.A.C.

(f) Procedures for site inspection and enforcement of control measures.

b. Acceptable efforts may include but are not limited to:

(1) Sanctions to ensure compliance. Examples include stop-work orders, non-monetary penalties, fines, bonding requirements and/or permit denials for non-compliance;

(2) Procedures for site plan review including the review of individual pre-construction site plans to ensure consistency with Department, Water Management District, or local sediment and erosion control requirements as appropriate;

(3) Steps to identify priority sites for inspection and enforcement based on the nature of the construction activity, topography, and the characteristics of soils and receiving water quality;

(4) Providing educational and training measures for construction site operators which may include inspector training under the Florida Stormwater Erosion and Sedimentation Control Inspector Training Program; and

(5) Requiring submittal of proof of an issued Department or Water Management District Stormwater Discharge or Environmental Resource Permit before issuance of local approvals for site clearing or construction.

c. The operator of the Phase II MS4 must define appropriate BMPs for this minimum control measure and measurable goals for each BMP. In the context of this minimum control measure, the term BMP is understood to include activities and programs undertaken to implement the construction site stormwater runoff control efforts required under this generic permit.



PHASE II 2021 GENERIC PERMIT

TITLE 40 CFR §122.34(B)

f. Develop and implement a SOP for construction site inspection and enforcement of control measures. The SOP for construction site stormwater runoff control program inspections shall include:

1. Prioritization of sites for inspection based on the nature and extent of the construction activity, topography, and characteristics of soils and receiving water quality.
2. Implementation of techniques for inspection to ensure the selection, installation and maintenance of BMPs is consistent with the regulatory mechanism required in Part V.B.4.a of this generic permit.
3. Enforcement responses such as warnings, stop-work orders, non-monetary penalties, fines, bonding requirements, referrals and/or permit denials to address non-compliance, to the extent allowable under state and local law.
4. Verification the construction site operator has received coverage under paragraph 62-621.300(4)(a), F.A.C., and/or Chapter 62-330, F.A.C., if required.



CONSTRUCTION SITE INSPECTION SOP BREAK-DOWN

PHASE I & PHASE II 2021 PERMIT REQUIREMENT

- **Why** inspect these sites?
 - Prioritization of Sites based on the construction activity
 - Department requires all sites larger than 1 acre or part of a common plan of development to be inspected.
 - Sites near impaired water bodies should be inspected more frequently.
 - Sites that have repeated violations or pose an environmental threat should be inspected more frequently.
 - Frequent rainfall
 - Repeated violations
- **Who** is doing the inspections and what qualifications do they need to have?
 - Department recommends that inspectors attend FSESCI training.
 - No requirements for inspector if they understand what erosion, sediment, and waste control BMPs should be in place
 - The Construction Site Operator inspections do NOT count as an MS4 construction site inspection.



CONSTRUCTION SITE INSPECTION SOP BREAK-DOWN

PHASE I & PHASE II 2021 PERMIT REQUIREMENT

- **What** are you inspecting for?
 - What types of BMPs does the municipality (LDC) require?
 - Do the BMPs on site match what is on the site plans (SWPPP)?
 - Are the BMPs listed on the site plan sufficient?
 - Are the BMPs installed correctly?
 - Are the BMPs appropriate?
- **When** are the inspections conducted?
 - Department expectation is sites requiring a CGP be inspected monthly.
- **Where** are the inspections conducted?
 - Municipalities should have a way of tracking the sites that are active within the city that meet the criteria for inspection.

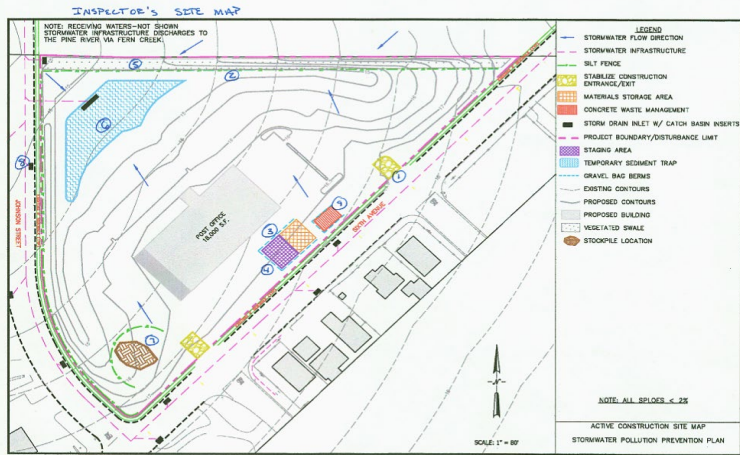


DURING THE INSPECTION

DEPARTMENT STANDARDS



NOTICE OF INTENT
TO USE
NPDES GENERIC PERMIT FOR STORMWATER
DISCHARGE FROM LARGE AND SMALL
CONSTRUCTION ACTIVITIES
(RULE 62-621.300(4), F.A.C.)



Stormwater Construction Site Inspection Report			
General Information			
Project Name	Stormville Postal and Distribution Center		
NPDES Tracking No.	NHR10BX01	Location	3100 Sixth Ave., Stormville, NH 03061
Date of Inspection		Start/End Time	
Inspector's Name(s)	Ms. Martina Davis		
Inspector's Title(s)	Stormwater Compliance Officer		
Inspector's Contact Information	(603) 444-3210		
Inspector's Qualifications	See Section 5, Part 5.1 of the SWPPP		
Describe present phase of construction			
Type of Inspection: ☐ Regular ☐ Pre-storm event ☐ During storm event ☐ Post-storm event			
Weather Information			
Has there been a storm event since the last inspection? ☐ Yes ☐ No			
If yes, provide: Storm Start Date & Time: Storm Duration (hrs): Approximate Amount of Precipitation (in):			
Weather at time of this inspection? ☐ Clear ☐ Cloudy ☐ Rain ☐ Sleet ☐ Fog ☐ Snowing ☐ High Winds			
Other: Temperature:			
Have any discharges occurred since the last inspection? ☐ Yes ☐ No			
If yes, describe:			
Are there any discharges at the time of inspection? ☐ Yes ☐ No			
If yes, describe:			
Site-specific BMPs			
- Number the structural and non-structural BMPs identified in your SWPPP on your site map and list them below (add as many BMPs as necessary). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required BMPs at your site. - Describe the corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.			
BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes
1 Stabilized Construction	☐ Yes ☐ No	☐ Yes ☐ No	



INSPECTION CHECKLIST

DEPARTMENT RECOMMENDATIONS

- The following should be included on your inspection checklists
 - Date
 - Inspector
 - Site
 - Purpose of Inspection (Routine or Due to Complaint)
 - If the CGP/ERP (if required) was present
 - What BMPs are present
 - Are BMPs properly maintained?
 - Are BMPs sufficient?
 - Follow-up actions?
 - Comments



FOLLOW-UP DOCUMENTATION

- Follow-up may occur because of a previous deficient inspection, complaints, or other concerns
- Follow-up and violations must be recorded as well as the site inspections themselves
 - The Department recommends having a section on inspection forms specifically for follow-up to consolidate paperwork.
 - Follow-up should be regarding violations or sanctions, reinspection due to previous deficiencies, or complaints from the public.



THANK YOU

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