

The Monthly Dirt

A Monthly Newsletter on the California Construction General Permit

By WGR Southwest, Inc.

You REAP what you Sow

Suppose on a warm spring Saturday morning, you go into the backyard and spend the day working in the garden. After weeding, mulching and tilling the soil, you grab the seed packets and get ready to plant – and your pocket starts buzzing. Handing the seed packets to your first-grader, you step away to take the call. The call takes longer than you thought it would, and when you finally come back to the garden, your little helper proudly announces that he is “*all done planting.*” Empty seed packets are scattered all around, and the garden is full of little furrows that have been covered up with soil. The problem is that your pint-sized partner can't remember where he planted everything! He does his best to recall while you mark each row as “carrots”, “corn”, “cucumbers”, and “cauliflower”. Six weeks later, the little carrot plants look an awful lot like corn shoots. The “corn” row is completely empty; and the rows marked “cucumbers” and “cauliflower” contain all different sorts of little plants. Thus, the old adage is proved true again: *you reap what you sow.*

Harvesting from construction sites – The law of sowing and reaping certainly applies to construction projects when it comes to erosion and sediment control. The BMPs you “plant” before the rain season will come to fruition during and after your storm events. Obviously, if no BMPs are installed, you can expect a harvest of NAL exceedances and compliance problems. But “sowing” the appropriate best management practices for your site will result in a harvest of good water quality. After the recent heavy rains we've experienced in California, we have talked with many contractors who have expressed surprise over their NAL exceedances, and the subsequent Notice of Violation. But, a review of their site shows that no soil cover is present, perimeter controls have not been properly installed, and the SWPPP map does not reflect the current conditions. You reap what you sow.

It is not too late to “plant” – That's the good news! You still have an opportunity to plant a different kind of seed at your construction project. The Construction General Permit references another kind of REAP – or more specifically, a **Rain Event Action Plan**. It is a mechanism by which a QSP or project manager can potentially make a change in the outcome of the predicted storm event. When implemented correctly, a REAP often will make the difference between compliance and non-compliance. However, too many contractors treat REAPs as just another form to fill out and don't take them seriously.

How to reap from REAPs – A REAP is essentially an action plan prepared by a QSP for a specific anticipated storm. Because site

conditions are always changing and morphing at a construction site, it is important to consider the current site conditions before a storm event moves in – in fact, the CGP requires it to be considered 48 hours prior to a storm event having 50% or greater probability. REAPs cannot (and should not) be prepared exclusively in the office. Preparing a proper REAP requires a site inspection, which should be the same as the mandatory pre-storm event inspection. This inspection will most likely produce a laundry list of items needing attention prior to the storm – such as materials that need to be covered or removed, and BMPs that need maintenance. The REAP will essentially become a “punch list” for the project manager to accomplish before the rain. The REAP also needs to identify all of the current types of activities being performed and the crafts and sub-contractors present on site (including contact information for their supervisors). Within 24 hours of the anticipated rain event, the REAP should be in the hands of the project manager so that the identified action items can be completed.

A pencil-whipped REAP (or no REAP at all) will result in frustration and violations. A well-prepared and implemented REAP will harvest compliant results. We've said this a bunch of times already, but just remember: “*What a man sows, that will he REAP.*” **MD**

More Facts about REAPs

Before preparing a REAP, make sure that you are aware of the following facts:

- ✓ REAPs are only required by Risk Level 2 and 3 projects. They are not required of Risk Level 1 or any LUP projects.
- ✓ A QSP must prepare the REAP. This is one requirement in the CGP that cannot be delegated to someone who is not a QSP.
- ✓ A likely precipitation event is any weather pattern that is forecasted to have a 50% or greater probability of producing precipitation in the project area. The QSP needs to obtain a printed copy of the precipitation forecast information from the National Weather Service Forecast (e.g., by entering the zip code of the project's location) at <http://www.srh.noaa.gov/forecast>).
- ✓ REAPs are required for all phases of the construction project and even for periods of inactivity.
- ✓ The CGP required that a paper copy of the REAP be maintained on site for the duration of the project or for up to three years.
- ✓ No set form or format is required for the REAP. A QSP can make their own REAP form or use one already prepared. **MD**

REAP Forms

Looking for a REAP form? Try these ...



The CASQA REAP form. Chances are this is the form that is in your SWPPP binder. If you have a subscription to CASQA's construction portal, you can download this form and many other resources. Go to www.casqa.org.

The Caltrans REAP form. This form is required on Caltrans projects. It is a "smart" pdf form. Go to <http://www.dot.ca.gov/hq/constr/forms/CEM2045.pdf>.

The Canvas REAP form. This form can be used on your smart phone, tablet, or laptop. Try it for free. Go to <http://www.gocanvas.com/mobile-forms-apps/11556-QSPpad-REAP>.

Upcoming Training

Got SWPPP? Classes coming to Lodi:

- ✓ QSP/QSD Training, **March 29 - 31, 2016**
- ✓ BMP Roundup, A Day of Hands-on BMP Training
April 14, 2016
- ✓ PDU Week, **May 23 - 27, 2016**

(For more information about these classes, go to www.gotswppp.com.)

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The EPA Calculator is Back, Again.

Down again, up again ... the erosivity calculator is back again. The State Water Board SMARTS system is displaying a message that the EPA's calculator is once again required for deriving R values for the RUSLE-based risk determination.

Quick QSP Quote

Did you know that an improperly installed fiber roll can actually worsen turbidity? Fiber rolls must be keyed into the soil 2 to 4 inches and staked down every four feet. If this is not done, water head pressure and jetting action can disturb fine soil particles and introduce them into the water flowing under the fiber roll. Unless installed correctly, your site would be better served without it.

Please contact us if you have any questions ...

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For more information, call (209) 334-5363 x110 or email jteravskis@wgr-sw.com