

October 2014

The Monthly Dirt

A Monthly Newsletter on the California Construction General Permit
By WGR Southwest, Inc.

Ready, Set, Go!

The storm season is upon us. Is your site ready? Do you have your sample kit? Are you ready to inspect?

With October 1st already behind us, we find ourselves facing another rainy season, and, true, there is no rainy season in the Construction General Permit, but, it has been a long time since QSPs have last prepared REAPs or performed storm event inspections and sampling. This edition of **The Monthly Dirt** is dedicated to blowing off the dust from your memory and refreshing QSPs on their requirements.

Prior to beginning the rainy season inspections, QSPs should get **READY** by doing the following:

- ☛ Here is something you may not have thought about. Make sure your underlying certification is still valid. Verify that you have paid the annual fees to the certifying organization and that you have kept up on your professional development units. If your CESSWI or CISEC certification becomes invalid, you have lost your QSP certification and you will not be qualified to perform the inspections.
- ☛ Check the pH and turbidity field instruments to make sure they are properly calibrating and functioning. Verify that you have a sufficient supply of calibration standards and that the calibration standards have not exceeded the expiration date.
- ☛ Obtain a new sample kit from the analytical testing laboratory for the non-visible pollutant sampling. It is not good to use sample containers that are more than one year old. You should have two sets of bottles for the two samples required – one of the affected area and one from an unaffected area.
- ☛ Get copies of the QSP inspection forms for your projects and place them in the SWPPP or in your field kit.

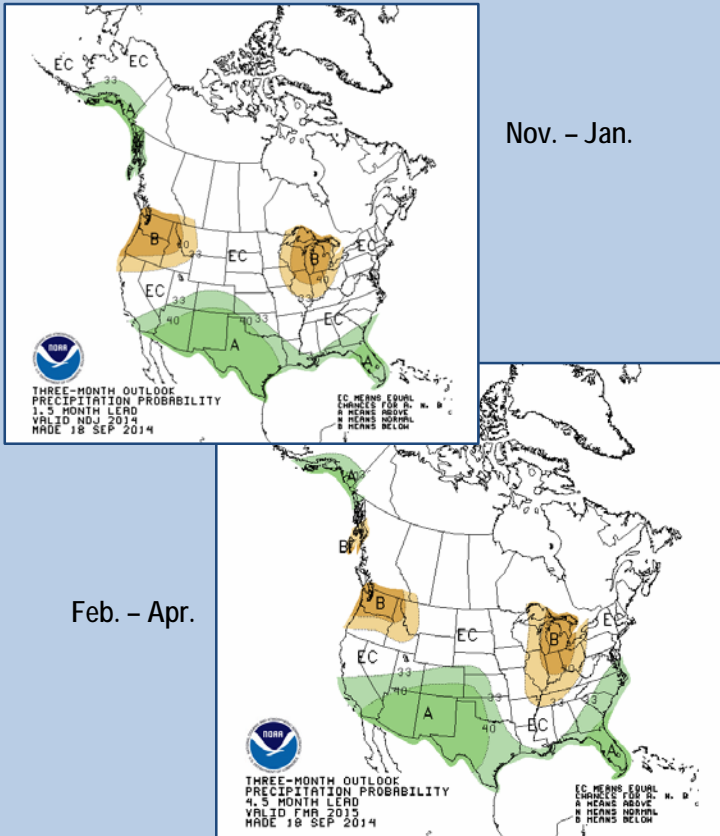
Now, get **SET** with the following:

- ☛ Review the SWPPPs for your projects to refresh your memory on possible discharge locations and sample points.
- ☛ Review the Construction General Permit or the attached **Quick QSP Quips** to refresh on the wet season obligations.
- ☛ Set your computer's web browser home page to the NOAA weather forecast for the location of your Risk 2 or 3 projects. This will help you not to forget to watch for storm events exceeding 50% probability that trigger the need for a REAP. You can access the website at: www.weather.gov
- ☛ Train those individuals to whom you have delegated responsibility for inspections or sampling. Don't forget to document the training.
- ☛ Before it starts raining, check your projects for compliance to the SWPPP and CGP. Make sure appropriate erosion and sediment controls are in place. Confirm that materials and pollutants which can be mobilized by storm water are covered or have been removed. Verify that maintenance of track out controls, previously installed BMPs, and storm water conveyance systems has been done.

Once you have done all the preparation, **GO!** And relax, you are now ready for the storm season. When the rains begin, you can go into the field with confidence knowing that you are prepared for whatever this storm season throws our way!

Is Drought Relief on its Way?

The National Oceanic and Atmospheric Agency (NOAA) has an online experimental long range weather forecasting tool¹. If this experimental tool is correct, it is calling for a drier than average early fall for Northern California but a wetter than average October and November for the most southern part of the State. However, as the year progresses into late fall and early winter the likelihood of a wetter than average wet season increases.



According to NOAA², "most of the models continue to predict El Niño to develop during September-November and to continue into early 2015. A majority of models and the multi-model averages favor a weak El Niño. At this time, the consensus of forecasters expects El Niño to emerge during September-October and to peak at weak strength during the late fall and early winter. The chance of El Niño is at 60-65% during the Northern Hemisphere fall and winter." This means that there is a 60% chance of more than the average amount of rainfall for California due to the weak El Niño. However with the warmer temperatures produced by an El Niño, the State's snow pack most likely will not be as heavy.

¹www.cpc.ncep.noaa.gov/products/predictions/long_range/seasonal.php?lead=1

²www.cpc.ncep.noaa.gov/products/analysis_monitoring/ensoadvisory/ensodisc.pdf

Upcoming Training ...

Got SWPPP? Classes coming to Lodi:

- ✓ QSP/QSD Training, **October 21 - 23, 2014**
- ✓ Need PDUs? We have free PDU workshops online at:
www.youtube.com/user/pduweek/videos

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

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SEPTEMBER 22-26, 2014

- We had 1,335 registrants
- Over 600 persons were involved
- There were 55 workshops from San Diego to Redding

SEPTEMBER 22-26, 2014

Please contact us if you have any questions ...

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Call ...

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Quick QSP Quips

Required Inspections

Risk 1, 2 & 3 – Traditional Projects:

- Weekly BMP inspections
- Pre-storm (within 48 hours before)
- Post-storm (within 48 hours after)
- During storms (every 24 hours)
- Quarterly for non-storm water flows

Risk 2 & 3 – Traditional Projects:

- Daily inspect immediate access roads for sediment and track out

LUP Types 1, 2 & 3 Projects:

- Daily visual BMP inspections and ensure that photographs of the site are taken before, during, and after storm events are taken during inspections, and submitted through the State Water Board's SMARTS website once every three rain events.

LUP Types 2 & 3 Projects:

- Pre-storm (within 48 hours before)
- Post-storm (within 48 hours after)
- During storms (every 24 hours)

Risk 3 & LUP Type 3 Projects:

- *If triggered*, receiving water or bioassessment observations

Sampling Requirements

Risk 1 – Traditional Projects:

- Only for non-visible pollutants if triggered

Risk 2 & 3 – Traditional Projects:

- Discharge monitoring (pH and turbidity) at least 3 times per day when there is a discharge
- Non-visible pollutants *if triggered*.

Risk 3 – Traditional Projects:

- Upstream and downstream receiving water testing *if triggered*.
- Bioassessment *if triggered*.

LUP Type 1 Projects:

- Only for non-visible pollutants if triggered

LUP Types 2 & 3 Projects:

- Discharge monitoring (pH and turbidity) at least 3 times per day when there is a discharge
- Non-visible pollutants *if triggered*.

LUP Type 3 Projects:

- Upstream and downstream receiving water testing *if triggered*.
- Bioassessment *if triggered*.

Non-visible sampling – All Risk and Type Levels:

- Triggered by a breach, malfunction, leakage, or spill observed during a visual inspection.
- Collected during the first 2 hours of discharge.
- Two samples one at the affected discharge point and another at an unaffected area

RAIN EVENT ACTION PLANS

- ☁ Required of Risk 2 & 3 traditional projects only. LUPs are not required to prepare REAPs.
- ☁ Are triggered by a 50% or greater possibility of rain per the NOAA weather forecast at www.srh.noaa.gov
- ☁ Must be prepared within 48 hours of the predicted storm event.
- ☁ Must be implemented and a paper copy on-site within 24 hours of the predicted storm event.
- ☁ Must be prepared by a QSP.

Qualifying Rain Events

A qualifying rain event is “any event that produces 0.5 inches or more precipitation with a 48 hour or greater period between rain events.” In other words, it is a period of rain that is “bookended” by dry weather that is at least 48 hours long.

Sampling Exemptions

1. It is not a “qualifying rain event”.
2. During dangerous weather conditions such as flooding and electrical storms.
3. Outside of scheduled site business hours.

Remember to document if any of these exemptions are applicable to your project.

Numeric Action Levels

Prepare a NAL exceedance report within 10 days if either of the following is true about your project's daily average:

pH is <6.5 or >8.5
Turbidity is >250 NTU

- ✓ NALs are daily averages of monitoring data from all discharge points for the entire day.
- ✓ pH must be averaged logarithmically. Averaging tool is at www.wgr-sw.com/pH
- ✓ NAL exceedance reports must be uploaded onto SMARTS.

Rules of Engagement for Sampling

The following are helpful guidelines that have been extracted from the permit to assist you in knowing when to sample:

1. If there is no discharge, then no sample is required.
2. Collect a minimum of 3 samples per day for the entire site.
3. Each day, collect at least one sample from each point of discharge.

Best Management Practices

- ❑ Risk 1 mandatory BMPs are found in Attachment C.
- ❑ Risk 2 mandatory BMPs are found in Attachment D.
- ❑ Risk 3 mandatory BMPs are found in Attachment E.
- ❑ LUP mandatory BMPs are found in Attachment A.
- ❑ The QSP must use a checklist for inspections and include a description of the BMPs evaluated and the deficiencies noted.
- ❑ Corrective action must begin within **72 hours** of identification and be completed as soon as possible.
- ❑ Inactive areas of soil disturbance that are not scheduled to be disturbed for at least 14 days must have effective soil cover.
- ❑ Projects must establish and maintain effective perimeter controls and stabilize all construction entrances and exits to sufficiently control erosion and sediment discharges from the site.
- ❑ Risk Levels 2 & 3 and LUP Types 2 & 3 projects must apply linear sediment controls along the toe of the slope, face of the slope, and at the grade breaks of exposed slopes to comply with the table shown at the right.

| Slope Percentage | Sheet flow length not to exceed |
|------------------|---------------------------------|
| 0-25% | 20 feet |
| 25-50% | 15 feet |
| Over 50% | 10 feet |

Questions? Call the QSP Help Hotline:
(209) 649-0877 or email at
jteravskis@wgr-sw.com

Quick QSP Quips copyrighted October 2013
By WGR Southwest, Inc.
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