The Monthly Dirt
A monthly newsletter on the California Construction General Permit

A well written SWPPP will communicate to the contractor and QSP exactly what the QSD is wanting installed on site

Imagine if you received a set of grading plans showing the outline of the project site and containing only the words "*cut and fill*". If you are the grading contractor, that set of plans is going to leave you scratching your head. Where are the cutting activities and where will fill be placed? And how much is to be cut or filled? Essentially that is what many SWPPP writers do—albeit often times unwittingly. In this edition of **The Monthly Dirt**, we're going to talk about the information that contractors and BMP installers need from the QSD which is all too often left out of the SWPPP.

The California NPDES Construction General Permit (CGP) requires that Qualified SWPPP Developers (QSDs) prepare a site-specific Storm Water Pollution Prevention Plan (SWPPP) which includes a "*description of **site-specific** BMPs implemented to reduce or eliminate storm water pollution.*" The California Stormwater Quality Association (CASQA) Construction BMP Handbook states, "*The SWPPP should be directed at personnel on the construction project (e.g., QSP, supervisor, foreman, and inspectors). The SWPPP should provide **specific** guidance on actions to be taken by these personnel.*"[1]

However, what we often see in SWPPPs is sometimes less than specific information. For example, we will review a SWPPP in which the QSD has called for "EC-4" in the SWPPP narrative and on the SWPPP drawings. EC-4 is a reference to the CASQA BMP fact sheet that provides guidance about hydroseeding.

The CASQA EC-4 fact sheet is a great resource for general information about hydroseeding but even if the contractor or QSP reads the fact sheet, they still will not know much more about what the QSD is wanting to happen at the site. The Construction BMP Handbook states, "*Fact sheets do not address site-specific implementation application needs and modifications. The QSD should provide site specific implementation requirements in the SWPPP.*"[2] When a SWPPP is provided to a contractor with just EC-3 Hydraulic Mulch, SE -10 Storm Drain Inlet Protection, WE-1 Wind Erosion Control, or an other fact sheet reference without providing details of how that BMP is to be installed at the project site throughout the various phases of the project, it is just like the civil engineer handing a grading contractor a piece of paper with the words "cut and fill". The SWPPP is saying the QSD wants something to happen, but it is not specifying what and how it should happen. *The sad thing is that many QSDs really believe they are providing a site-specific SWPPP when they incorporate into it the BMP fact sheets and reference codes.*

So let's look at some specific types of BMPs where a QSD can step up their game by telling us more.

Hydraulic Mulch & Hydroseed:

Collectively these types of erosion controls are referred to as hydraulic erosion control products (HECPs) and they come in a wide variety of manufactured products. These sprayed-on products can be made from wood, wood cellulose, recycled newsprint, straw, cotton, and other plant fibers, along with tackifiers, polymers, fertilizers, compost, and other additives. The Erosion Control Technology Council (ECTC) has categorized HECPs into five types based on erosion control performance, vegetation establishment and estimated functional longevity.[3]

ECTC Type 1 HECPs are designed for use on relatively flat areas for an ultra short term lasting up to 1 month; includes base mulches such as cellulose.

ECTC Type 2 HECPs are designed for use on minimal slopes and for short term lasting up to two months; includes stabilized mulch matrix which is a mulch with a tackifier.

ECTC Type 3 HECPs are designed for moderate slopes and moderate term lasting up to three months; includes bonded fiber matrices (BFM).

ECTC Types 4 HECPs are designed for steep slopes and extended term sites needing erosion protection for 6 months; includes fiber enforced matrices.

ECTC Type 5 HECPs are designed for steeper slopes (as compared to other HECPs) and erosion control needs of 12 months or more; includes high performance flexible growth matrices.

Not sure how to get more specific with your EC-3 or EC-4 specification? There are some good industry tools available for QSDs to learn more so they can provide the detailed information contractors need. Profile, a manufacturer of HECPs, has a free online specification builder which can greatly assist with adding detail to a construction SWPPP. It is available at erosioncontrolspecs.com .

Also, don't forget to specify seed in your EC-4 specification. Wondering what type of vegetation is required, desired, or needed? The first place to check is in the owner's specifications. Public or agency projects will often have a seed specification already identified. The second place to review is other environmental documents and permits such as CEQA documents or the Section 1600 Department of Fish and Wildlife permit. A third place is to check with the owner and find out about their desires and future plans for the non-built areas. After checking with those, it may be up to you—the QSD. A good resource for specifying seed and application rates is to check with a local hydroseeding company who has experience applying hydroseed in the area of your project. Seed suppliers such as Stover Seed are also good sources of information.

Drain Inlet Protection: Most SWPPP plans will call out drain inlet protection or SE-10 but all too often that is the extent of the information the QSD is providing. Essentially the QSD is saying where they want drain inlets (DIs) protected but not providing any guidance as to how they should be protected and how that protection should change as the project changes.

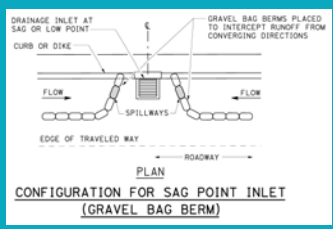
DRAIN INLET PROTECTION

This is where the CASQA fact sheet can help but it is still up to the QSD to make some decisions and to provide site-specific guidance. The CASQA SE-10 fact sheet identifies seven types of DI protection.

Type 1—Silt Fence is for keeping sediment and sediment laden water out of the DI. Remember, silt fence is a dam not a filter. It does not let very much water pass through it. If you need water to drain at that DI, then this is not the option you want.

Type 2—Excavated Drop Inlet Sediment Trap this is where a drain inlet is stubbed up and higher than the surrounding area. The area surrounding the DI can also be excavated to create this condition. This essentially works the same as curb cutback for sediment control and is ideal for drainage systems that have not yet been placed into service or where surrounding pavement is not completed.

Type 3 –Gravel bag is the type of DI protection that probably most SWPPP writers are envisioning when the circle the DI on the SWPPP map and label it SE-10. This is ideal for paved or compacted surfaces. Caltrans has a detailed specification for this type of DI control.



Type 4—Block and Gravel Filter according to CASQA are suitable for curb inlets and commonly used in residential, commercial, and industrial construction. But beware! Most municipalities would not be too excited about this being placed in the street. You should check with the municipality first before using this one off site.

Type 5—Temporary Geotextile Insert these are typically proprietary systems but can also be improvised in the field with geotextile fabric. There is a wide variety of manufactured products that fit into this category including some that are more rigid and durable. When specifying this type, it is good to provide a specific make and model.

Types 6 & 7—Biofilter Bags and Compost Socks The difference between Types 6 and 7 is that one is filled with wood mulch and the other is filled with composted wood mulch. Both are considered filters and both perform well on paved surfaces. When it is important to treat water before entering the DI, these two types of DI protection are good options.

The SWPPP writer should consider the phase of the project and the anticipated sediment load when specifying the type of DI protection to be used. During times of significant soil disturbance, it may be appropriate to surround the DI with silt fence; and as the project moves into the underground phase an excavated drop inlet protection may be best. When surfaces have been paved, gravel bags or compost socks may be preferred for on-site DIs and temporary geotextile inserts may be best for use in off-site DIs and in areas of high traffic flow. The changes in DI protection types needed throughout the life of the project should be identified in the SWPPP narrative and the BMP implementation schedule.

Wind Erosion Control: Many SWPPPs will include the following statement on the SWPPP map or in the narrative:

PROVIDE WIND EROSION CONTROL AT ALL TIMES PER BMP WE-1.

What does that specifically mean for your project site? Most will automatically envision a water truck driving around the site. As shown by the above comment that was included on a SWPPP map, the CASQA WE-1 fact sheet is a good place to start but it does not specify what should happen on a particular site. For project -specific wind erosion and fugitive dust controls, a QSD might include the following:

- The QSD should specify when and where a particular dust palliative will be applied as well as the type of palliative and the amount applied. Refer to this list for options.
- Specify how stockpiles should be covered to prevent wind erosion.
- Specify locations where existing soil cover will not be disturbed and a schedule for when areas of soil disturbance will occur.
- For windy locations, specify when and where wind barriers should be installed.
- Specify an on site speed limit for dirt roads of 15 mph or less.
- Specify that soil disturbing activities should cease during windy conditions when other mitigation measures are not successfully controlling fugitive dust from leaving the project boundary.

The CASQA and Caltrans BMP fact sheets are wonderful and very useful resources. Not so much in the way many QSDs use them by including the fact sheets in an appendix to the SWPPP hoping that the QSPs and contractors will learn something about BMP implementation and maintenance. But rather, the *fact sheets are for the benefit of the QSD* who can learn about the options for certain BMPs. This information, combined with the education and training the QSD has received, will allow a QSD to make an informed selection for a particular project. Too many QSDs leave that selection completely up to the contractor by not specifying exactly what is needed for a given situation. Just as a professional civil engineer is providing specific instructions to the grading contractor of where to cut and where to fill on a project, so must the BMP selection be left up to the professional—the QSD. If the SWPPP is calling for EC-3 Hydraulic Mulch which type do you want to bet that most contractors will select? It is entirely possible that the product selection will have more to do with cost than performance. But how would a contractor know otherwise? *The QSD needs to tell us more!*

[1] CASQA Stormwater BMP Handbook—Construction, August 2023, p. 2-16, www.casqa.org

[2] Ibid, p. 3-4

[3] Erosion Control Technology Council Fact Sheet: Hydraulic Erosion Control Products (HECPs); https://www.erosioncouncil.org/hydraulic-erosion-control-products-hecps/

Please contact us if you have any questions ...

The Monthly Dirt

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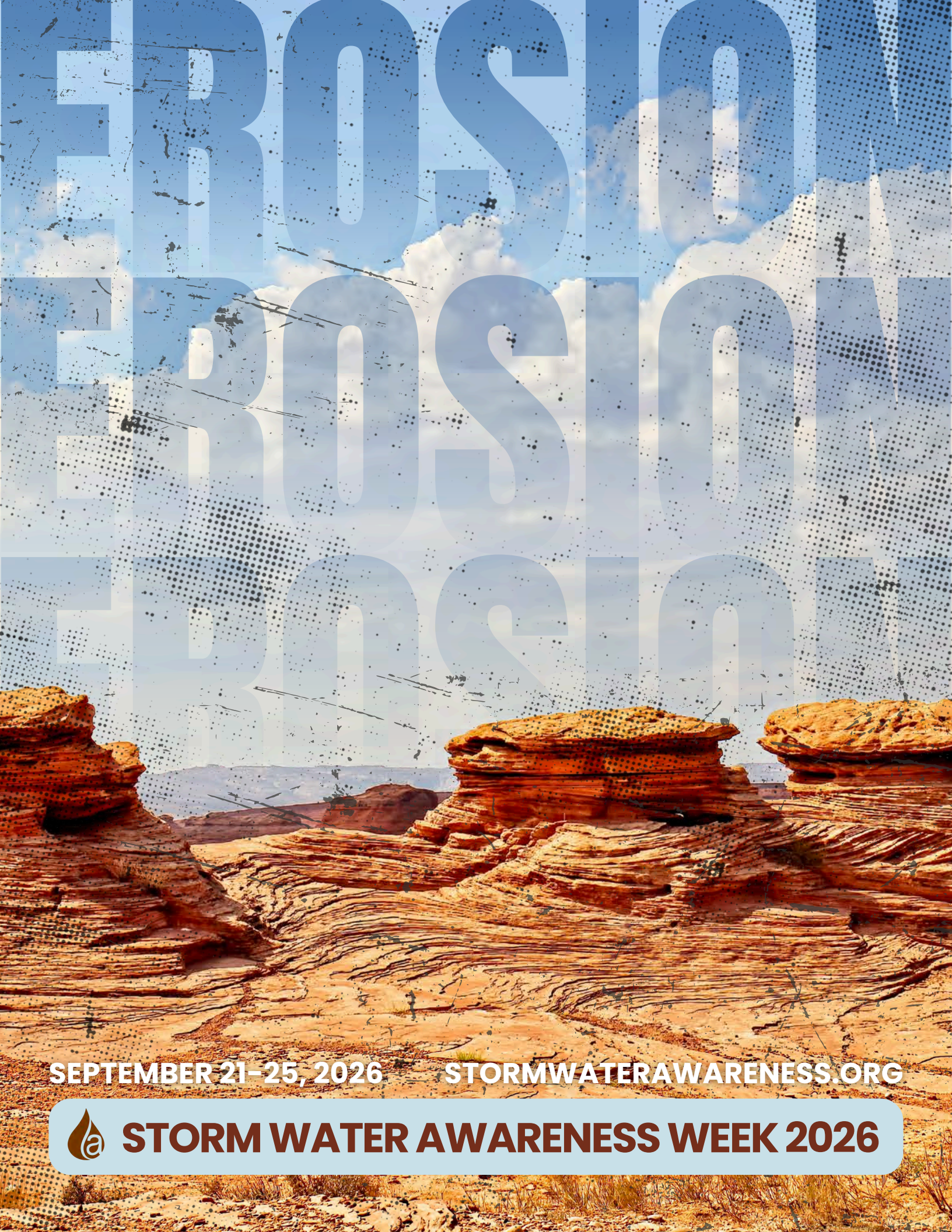
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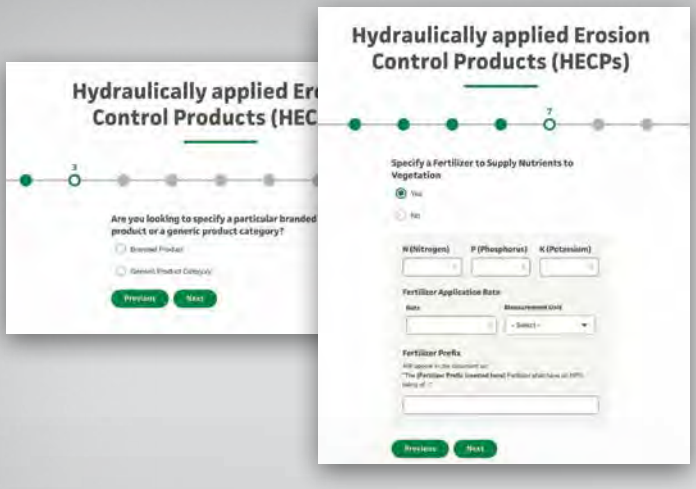

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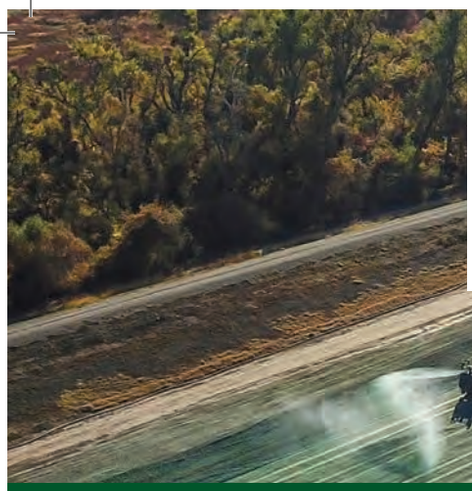

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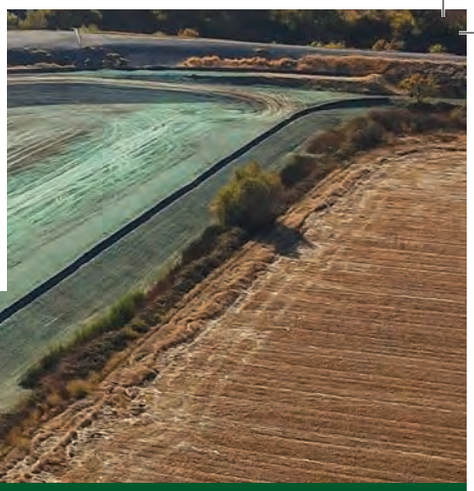

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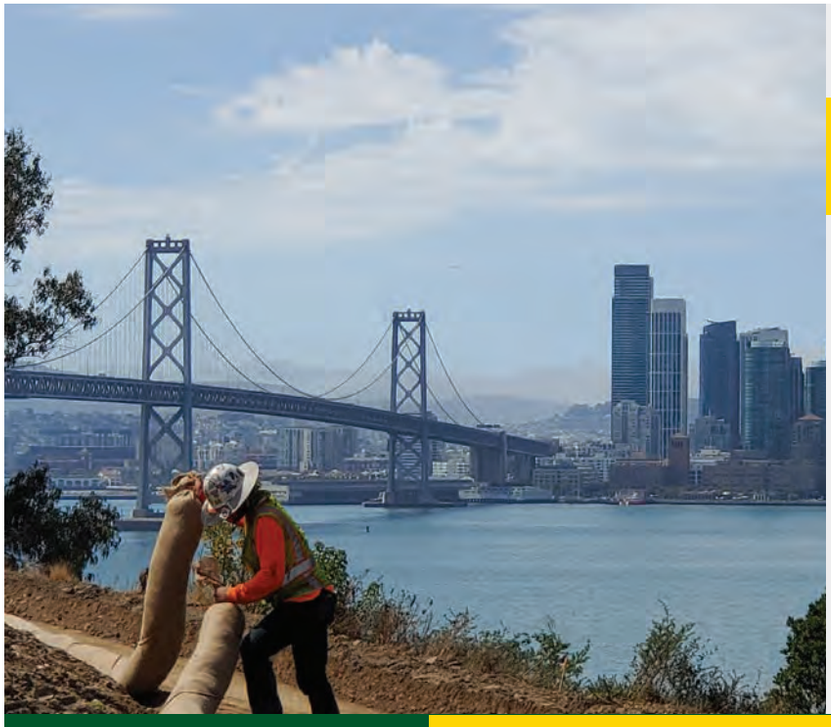

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