



The Monthly Dirt

STRETCHED TOO THIN

How is a QSP to do it all?

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

The windshield wipers are moving faster than the Interstate traffic, four empty Starbucks cups lay on the floor of the pickup, you have already visited three projects that morning, you pop two antacid tablets thinking about the three additional sites you still need to get to before the rain peters out, when the boss calls and asks if you could stop by a new project. Sound familiar? But now that we are in the rainy season such is the life of the QSP. You have probably found yourself asking how much can a QSP effectively handle? When does it become too much? In this edition of *The Monthly Dirt*, we are going to talk about the intent of the Construction General Permit for maintaining adequate QSP oversight.

CGP QSP Requirements: According to the Construction General Permit (CGP), *“The discharger shall ensure that all BMPs required by this General Permit are implemented by a Qualified SWPPP Practitioner (QSP). A QSP is a person responsible for non-storm water and storm water visual observations, sampling and analysis.”* The CGP also states that one of the jobs of the QSP is to ensure *“full compliance with the permit and implementation of all elements of the SWPPP.”*

So, what does that mean and how does a QSP accomplish that running from site-to-site? We have noticed that it is commonplace, across the State, for QSPs to be at each project location for less than one hour per week. That is a pretty short amount of time to make sure that the project is in full compliance with the Permit and to oversee the implementation of all BMPs. This is not necessarily the fault of the QSPs. Many QSPs who are employed by the discharger or the on-site contractor are tasked with much more than overseeing the storm water compliance program. Other QSPs are contracted to perform a specific service, such as a weekly site visit, and are simply not paid to be on site for more than that.

Cloning QSPs: It would be nice if QSPs could be cloned, but that would involve too many PDHs ... so the Construction General Permit allows another option for multiplying a QSP's influence. *“All inspection, maintenance repair and sampling activities at the discharger's location shall be performed or supervised by a QSP representing the discharger. The QSP may delegate any or all of these activities to an employee trained to do the task(s) appropriately but shall ensure adequate deployment.”* This enables QSPs to delegate inspections, sampling, and the maintenance and repairs of BMPs as long as the person being delegated the responsibility has been

appropriately trained. And, what is **“appropriately trained”**? The Permit doesn't specifically define it, but common sense would dictate that before you send someone out to test for pH and turbidity, they will have been taught how to calibrate and use the field instruments, where and how samples should be collected on that project, the fundamentals of “representative” sampling, and how to document the monitoring results. If the QSP is not usually present onsite, it may also be wise to instruct individuals who are usually there about where erosion and sediment control measures are to be installed, how to inspect them for effectiveness or failure, and how to maintain them. Such a training session should involve bringing out the SWPPP map and BMP fact sheets and physically reviewing the locations in the field. Remember that the training of QSP-delegated staff must include documentation that will need to remain with the compliance files for at least three years.

Can we hire one QSP to train all of our company's superintendents? This is a question that is answered on the State Water Board's website. Yes, one QSP can train all the company's superintendents. However, the Regional Water Board inspectors may ask to meet with or conduct an inspection with the QSP responsible for a particular project or site, and that individual should be accessible. The QSP, and not the trained supervisors, is responsible for the implementation of BMPs and the training of construction site employees about the SWPPP requirements for each construction project.

What Can a QSP Not Delegate? REAPs – Rain Event Action Plans must be developed by the QSP. The implementation of the REAPs may be delegated to an appropriately trained individual, but the actual preparation of the written document must be done by a QSP.

Upcoming Training

Got SWPPP? Classes coming to Lodi:

- ✓ QSP/QSD Training, January 15-17, 2019

(To register for the class, go to <http://www.gotswppp.com/events.html>)

How to Know if a QSP is Stretched Too Thin: While it may be economically necessary to try to get as much done as possible with the existing resources, there does come a time when it is necessary to realize that a particular QSP is not able to single-handedly and effectively manage all aspects of the storm water compliance program. The following is a checklist of site and program implementation conditions that may indicate the need for more QSP oversight:

- ☑ The site has had rain events that occur during working days resulting in a discharge but with no sample results;
- ☑ The QSP frequently arrives to the project after the rain and discharge have stopped;
- ☑ The three required samples are always collected within a 30-minute time period or less;
- ☑ Chronic missing of documentation for weekly and storm-event inspections;
- ☑ No documentation of regular storm water training events for on-site employees and sub-contractors;
- ☑ Receiving a notice of violation from a municipal or State Water Board inspector;
- ☑ Unchecked erosion on slopes;
- ☑ Track out or sediment deposited off site; and
- ☑ The QSP has Roloids in his safety vest, desk drawer, glove compartment, and rain jacket; and is always talking about needing a vacation.

MD

Did You Know?

The Construction General Permit expired on September 2, 2014.



However, it remains effective in its current state until the permit is renewed. The State Water Board is in the process of renewing the permit and now is the time to become a part of that process. Is there something that you would like to see changed in it? Watch the above video with Amy Kronson and Laurel Wardrip of the State Water Board in which they talk about what to expect with the new CGP and how to provide input on what should change.

QSP Toolbox

Every contractor needs to have their tools to get the job done and to be efficient at what they do. It is no different with QSPs – they need to have the right tools for the job. Here is a list of recommended tools to have with you to help you get your job done quickly and efficiently:

- × High visibility rain gear ([click here for an example](#))
- × Rain pants ([click here for an example](#))
- × No slip mud boots ([click here for an example](#))
- × pH meter with calibration buffers ([click here for an example](#))
- × Turbidity meter with standards ([click here for an example](#))
- × Electronic inspection app ([click here for an example](#))
- × Rain gauges for each site ([click here for an example](#))
- × Nitrile gloves ([click here for an example](#))
- × Weather resistant clip board ([click here for an example](#))
- × Grease pencils ([click here for an example](#))
- × Miscellaneous sampling equipment supplies, such as dust pans, pitchers, buckets, rope, carabiners, zip lock bags, etc.
- × Spray bottle with deionized or distilled water for cleaning instruments and equipment
- × Paper towels and drying rags
- × Car charger for the phone
- × Salty snacks and drinking water
- × Hard hat and clear safety glasses
- × A (dry) change of clothes (especially socks)

Please contact us if you have any questions ...

The Monthly Dirt Newsletter Editor:

John Teravskis, QSP/QSD, CPESC, QISP, ToR

jteravskis@wgr-sw.com

(209) 334-5363 ext. 110 or (209) 649-0877

Technical Questions about Environmental Compliance?

Call ...

Mike Lewis, QSP, CESSWI (Northern California)

mlewis@wgr-sw.com, (209) 334-5363 ext. 116

Gray Martz, QSP/QSD, PG (Southern California)

jgmartz@wgr-sw.com, (562) 799-8510 ext. 1002



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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.weather.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
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