December 2011

The Monthly Dirt

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

Can They Do That?

You think this will be an easy *in* and *get-out-quick* job. The project is mostly in the dry season and you have checked the EPA's Erosivity Calculator and found the R value to be 4.25 for your 3.5-acre site. Perfect! You qualify for the Construction General Permit waiver! No SWPPP or monitoring needed! Then two days later you get an email from SMARTS like the one shown here. It says the Regional Board has re-evaluated the R value for your site and is denying your waiver because they calculated the R value to be greater than 5.

> Your submitted Erosivity Waiver is reviewed by Water Board and the Status is Returned - Waiver .
>
> The reason/reasons for this decision is/are:*Incorrect NOI
>
> Notes : The EPA Erosivity Calculator has an error for your site & the R value is actually 8.88 using RUSLE2. Please contact the local Regional Water Board with questions on the difference between the EPA calculator & RUSLE2.

Can they do that?! Unfortunately, we have been seeing this same scenario play out in various Regional Boards and it seems to be occurring more frequently. Yes, the Regional Board does have the authority to question the R values. The State's CGP FAQ says: "*The Regional Board has the authority to question any aspect of the sediment risk calculation, including the R-factor used in determining Watershed Sediment Risk. The RUSLE2 computer program can also be used to calculate the R-factor and in many cases yields more accurate values than those generated from the EPA Erosivity Calculator.*" So don't throw away the SWPPP bid too soon! Give it a couple of days. Usually you will get a response from SMARTS within 2-3 days. However, our experience shows it is not consistent, within a few days of the above denial; a NOI was filed for another project within a stone's throw of the denied project for the exact same period of time. In that case, the waiver was accepted. *That is good; but just don't tell the guy who had his waiver denied!*

Bret's QSP Chatter … Let's talk "Run-on Controls"

As the weather turns colder and the storms start backing up in the Pacific Northwest, our responsibility as contractors is to protect our sites to the Best Available Control Technology (BAT/BCT). When dealing with run-on, the Permit states that "run-on from offsite shall be directed away from **all** disturbed areas or shall collectively be in compliance with the effluent limitations in the General Permit."

How do we direct run-on away from our site?????? Let's take a look at some BMPs that are effective at directing or deflecting potential run-on from our disturbed soil areas.

CASQA's EC-9 *Earth Dikes and Drainage Swales* are the most effective at stopping potential run-on. They capture or deflect 100% of run-on up-gradient of our disturbed soil areas. What if my site isn't big enough for a swale or earth dike? More conventional means that are almost effective as the swale or dike is CASQA's SE-6 *Gravel Bag Berm* or SE-8 *Sand Bag Barrier*. While these BMPs are used more as a sediment barrier, they can deflect run-on from potentially impacting your site if caught unprepared.

By deflecting run-on from disturbed soil areas, you are protecting yourself from potential erosion on slopes or that newly graded pad you just finished before the rain event. By not deflecting or diverting run-on, you are inviting someone else's contaminated run-off to affect or possibly contaminate your site. You are also adding to the volume of water that is now run-off from your site causing you to effectively manage more run-off.

The paragraph closes by saying that it "shall collectively be in compliance with the effluent limitations in the General Permit." So what are the effluent limitations???? What is your Risk Level??? Are you blowing your pH and turbidity readings??? Does the Basin Plan for your area have prohibitions for your receiving water??? How about City ordinances??? Are you in compliance with them??? Better to ask for help now than beg for forgiveness later as these tools are only as effective as their implementation. When in doubt, ask your QSP.

John's QSD Clatter

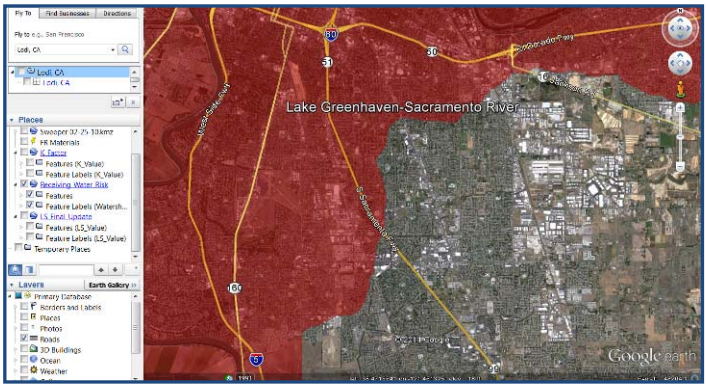
Risk Determination GIS

I was reviewing a SWPPP prepared by another consultant and in it I saw an aerial map showing the K and LS values for the project location. So, being someone who likes to have the latest gadget, I contacted Patrick Otsuji of the State Water Resources Control Board who oversees the SMARTS system. Patrick replied by sending me a link to the State's ftp site and explained that the GIS data is available in GIS shape files, Google Earth KML files, and pdf maps.

ftp://swrcb2a.waterboards.ca.gov/pub/swrcb/dwq/cgp/Risk/

He said to click on the RUSLE folder for the K and LS data. I asked him if these files would be updated often and if we should periodically download them. Patrick replied that the K and LS maps are pretty much set and, on occasion, they will update the receiving water risk map, but not often.

Since getting our hands on these, we have really come to see the value of them. We particularly have found use for the receiving water risk map.



It allows you to see what the State considers elevated receiving water risk. In our risk determinations, we have noticed SMARTS does not seem to always agree with the Basin Plans. We have had occasions where we believed a project to be in a COLD, SPAWN, & MIGRATORY watershed, but when we ran it through SMARTS it was assigned a Risk Level 1 category. Such was the case of an actual project that was in the non-red area of the above map. SMARTS only assigns high receiving water risk to those projects that are located in the red shaded areas. We really like using the KML files through Google Earth. It is a very convenient way to graphically see the risk determination criteria.

We have uploaded the KML files to our website and you can download them by going to http://gotswppp.com/events.html. Look for the side bar where you can also download past copies of this newsletter.

Upcoming Training …

- Got SWPPP? QSP/QSD Classes
  - ✓ Modesto – Dec. 13 – 15, 2011
  - ✓ Fresno – Jan. 17 – 19, 2012
  - ✓ Fairfield – February (dates TBD)
  - ✓ Lodi – March (dates TBD)
- *Customized training … bring WGR to your facility or project site. Call us for more info.*
- If you are interested in taking a CESSWI review class in the Lodi area, contact Lisa Smith at lsmith@wgr-sw.com. If there is enough interest, she will coordinate an event taught by an Enviro-cert Intl.-approved instructor.

Please contact us if you have any questions …

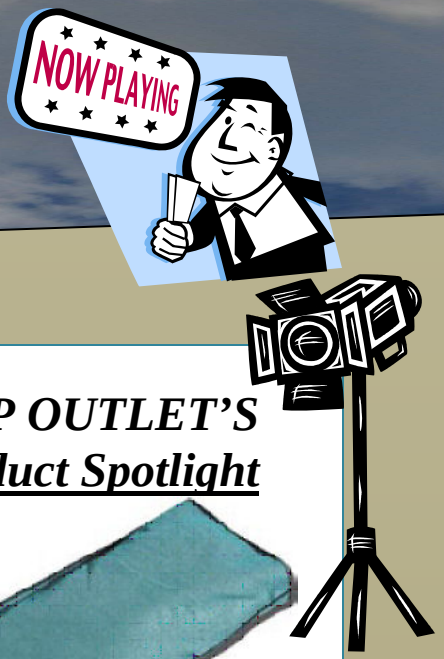
The Monthly Dirt Newsletter Editor:
John Teravskis, QSD, CPESC, REA-I
jteravskis@wgr-sw.com
(209) 334-5363 ext. 202 or (209) 649-0877

Technical Questions about Environmental Compliance?
Call …

Bret Smith, QSP, CESSWI
bsmith@wgr-sw.com, (209) 642-0181

Bill Senner, QSP, CESSWI
bsenner@wgr-sw.com, (310) 629-5260

BMP
bmpoutlet.com



December Special

Hornet's Nest Drain Inlet Filter

$40 (Bag Only) or $50 (w/ Oil Pillow)

A unique, under-grate storm drain filter. The oversized base allows the filter to be used with a variety of size and shape drain inlets. Simply insert the filter, place the grate into place and trim the excess material for a custom fit and clean appearance. The yellow webbing secures the filter to the grate and doubles as lifting straps to quickly and easily remove the filter, grate and all, for simple cleaning. The sediment collection cone has 4 overflow portals to ease congestion during heavy storm events.

Material - 8 ounce non-woven geotextile
Strapping - Weather resistant 2" polypropylene webbing
Flow Rate - 90 gpm/ft
Dimensions - 48" x 36"

pH Solution Packets (4.0,7.0,& 10.0 X 5)
$29.95

Contents include:

Single use pH solution packets. This box set includes 5 of each buffers (4.0, 7.0, & 10.0). The set also includes bonus rinse packets.

Caltrans Gravel Bag
$3.00

All purpose sediment control device, which can be filled with rock up to 40 lbs. per bag.
Outer Material - 8 ounce Non-Woven Geotextile
Dimensions - 16" x 24"
Durability - 500 lb. burst strength
Flow Rate - 90 gpm/ft
Rock not included

Visit us at www.bmpoutlet.com

BMP OUTLET'S
Product Spotlight

Silt Sifter® is the ultimate solution! The patented dual-component, bag-within-a-bag design, Silt Sifter® Bag is the original cushioned sediment control device incorporating materials specifically chosen for both 'filtration' and 'high-flow' performance. Squared on one end to better hug the curb, the Silt Sifter® Bag comes either pre-filled with 30 pounds of 1" natural rock or empty. The sewn-in Heavy Duty 2" Velcro enclosure makes it a snap to fill and provides a solid barrier to prevent any rock from escaping making for a cleaner and tidier job site.

Product Specifications:

- **Outer Material High density polyethylene - Poly thread (4) lock stitching**
- **Filtering Media Pine Wood Excelsior***
- **Rock Bag High density polyethylene - Poly thread (4) lock stitching**
- **Stabilization 1" rock (filled)**
- **UV Rating 85% with 364° flammability point**
- **Dimensions 30"L x 16"W x 6"H**
- **Weight (Dry) Approximately 30 lbs. (filled)**
- **Durability 500 lb. burst strength**
- **Maintenance Clean with power wash or strong hose**

***Pine wood excelsior acts as a filter for capturing silt, sediment and soils. Also a cushioning agent to substantially reduce product damage under normal conditions.**

Flow Test Results

- **Free Flow Water (no debris) 30 GPM (gallons per minute)**
- **Sand 29 GPM**
- **Top Soil 28 GPM**
- **Clay 24 GPM Patent US 6,905,289**