

**CONSTRUCTION STORM WATER
MANAGEMENT PROGRAM (CSWMP)
FOR CITY OF MERIDIAN
CONSTRUCTION PROJECTS**

Revised July 2, 2103

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FOR CITY OF MERIDIAN CONSTRUCTION PROJECTS**

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Administered by:
City of Meridian, Public Works Department

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1.0 INTRODUCTION TO CONSTRUCTION STORM WATER MANAGEMENT

1.1 OVERVIEW

This manual outlines the City of Meridian's (City) Construction Storm Water Management Plan (CSWMP) and the stormwater pollution prevention procedures required to be implemented for City owned construction projects. This manual provides a comprehensive set of priorities, activities, and directives that constitute the City's strategy towards managing storm water on City construction sites. This plan describes how the City addresses its construction activities to reduce the discharge of pollutants from construction sites. The goal is to protect receiving water quality at all times during the process of construction. This manual reflects many of the procedures and directions for meeting the requirements of the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit [CGP]). These procedures and directions ensure pollutant discharges from City construction sites are reduced by measures that qualify as either "best conventional pollutant control technology" (BCT) or "best available technology economically achievable" (BAT).

The City will implement and enforce this manual to reduce pollutants in storm water runoff from City construction sites. The plan includes elements that provide for:

- Project Planning and Design Guidance;
- Storm Water Management Standards;
- Enhanced Reporting System;
- Inspection and Enforcement Program; and
- Training Program.

1.2 CITY OF MERIDIAN BACKGROUND

The City is contained within Ada County whose total population is approximately 390,000 and is adjacent to Canyon County in Idaho. Meridian's population is currently estimated at approximately 75,000 and significant growth is expected over the coming two decades. As a result, the City will be undertaking significant expansion projects, some of which will fall under the permitting requirements of the CGP. For purposes of this plan, construction projects undertaken by the City vary and may include, but not be limited to, large industrial projects including water and wastewater infrastructure construction, public service building construction, and public facilities.

1.3 PURPOSE OF THE PLAN

Under the Federal EPA promulgated NPDES – Regulations for Revisions of the Water Pollution Control Program Addressing Stormwater Discharges Final Rule (EPA Final Rule), the City must apply for coverage under the CGP for City construction projects which meet EPA CGP permitting requirements. Further, City construction projects that are not required to obtain coverage under the CGP are required to satisfy Erosion and Sediment Control Plan (ESCP) requirements as stated in

section 3.1.7 of this manual to minimize pollutant runoff from City construction projects. The goal is to protect water quality at all times from pollutants generated during the process of construction for City projects.

1.4 REGULATORY HISTORY

The federal regulations that require the City to undertake this program come from Section 402 of the Clean Water Act (CWA), specifically that portion related to a permitting program under the NPDES. In 1972, CWA amendments prohibited discharges of pollutants from point sources and later, 1987 amendments defined storm water as point sources. In response to the need for comprehensive NPDES requirements for discharges of storm water, Congress amended the CWA in 1987 to require the EPA to establish phased NPDES requirements for storm water discharges. Phase I sources include: (1) storm water discharges associated with 11 categories of industrial activities, (2) construction activities disturbing 5 acres of land or greater, and (3) storm water discharges from municipal separate storm sewer systems (MS4) located in municipalities serving a population of 100,000 or more. All discharges associated with industrial activity that discharge through municipal separate storm sewer systems or that discharge directly to waters of the United States are required to obtain a NPDES permit, including those which discharge through systems located in municipalities with a population of less than of 100,000.

In 1999, EPA promulgated regulations for Phase II of the NPDES storm water program. Phase II requires NPDES permits for storm water discharges from small MS4s with a population of less than 100,000 that are located in urbanized areas and small construction sites. The Phase II regulations lower the acreage for when an NPDES permit is required for construction or land clearing to 1 acre while allowing a case-by-case determination for sites less than 1 acre. Also, in the Phase II Stormwater Program, the “No Exposure” exemption of the program is expanded to all categories of industrial activity except construction.

There are three general requirements under the NPDES Program for obtaining coverage under the NPDES General Permit for Stormwater Discharges from Construction Activities, otherwise known as the Construction General Permit:

1. Develop a Stormwater Pollution Prevention Plan (SWPPP) with appropriate Best Management Practices (BMPs) to minimize discharge of pollutants from the site.
2. Submit a Notice of Intent (NOI) that includes certain required information based on the current CGP and implement, on site, the SWPPP and its BMP measures.
3. Submit a Notice of Termination (NOT) when “final stabilization” of the site has been achieved as defined in the CGP or when another operator has assumed control of the site.

Construction activities covered by the CGP may include, but are not limited to road building, construction of residential houses, utility installation and/or repair, office buildings, or industrial buildings, and demolition activities that disturb an area equal to or greater than 1 acre. The CGP also applies to construction/demolition activities that disturb less than 1 acre and are part of a larger common plan of development or construction/demolition activities associated with the sale

of a planned disturbance equal to or greater than 1 acre. Construction activities disturbing less than 1 acre may be required to obtain a NPDES permit by the EPA based on the potential for contribution to a violation of water quality standards or for significant contribution of pollutants to waters of the United States.

If a construction activity is undertaken at an industrial facility that already holds a permit for industrial storm water discharges, then a separate permit must be obtained for the construction activity.

Currently, enforcement of CGP provisions in the State of Idaho is the responsibility of EPA Region 10. The NPDES program does provide the State of Idaho an opportunity to review and assess the effect of construction on water quality based on state water quality standards. This review is provided for under Section 401 of the CWA and allows the State to determine certification requirements under Section 401 of the CWA, so that the project does not violate state water quality standards. All projects requiring coverage under the CGP are to certify as meeting the conditions listed under Part 9 for the State of Idaho.

1.5 REGULATORY REQUIREMENTS FOR CONSTRUCTION

The requirements of the CWA for construction projects are specified in the terms, conditions, and provisions of the CGP which is the primary driver of the regulatory requirements for managing storm water on construction sites. Under the current regulatory framework, the City must apply for coverage under the CGP for all construction projects which meet the eligibility requirements of the current EPA CGP. The City must apply for this coverage through the submission of a NOI to the EPA. With its NOI, the City must develop and maintain a SWPPP describing the City's strategy for managing storm water at a particular construction site. The SWPPP shall describe all requirements of the CGP including the BMPs to be implemented, monitoring requirements if discharging to sediment or nutrient impaired waterways, and natural buffer documentation or compliance alternatives. The permit also requires the SWPPP to establish a schedule of BMP implementation. Further, City construction projects which are required to be covered under the EPA CGP must comply with the erosion and sediment controls set forth and enforced by the current version of the CGP as well any additional water quality standards and monitoring requirements set forth in the Idaho Department of Environmental Quality (IDEQ) CWA Section 401 Clean Water Certification and DEQ Water Quality Standards related to construction activity.

The City requires that the implementation of construction site BMPs are consistent with the Idaho Department of Environmental Quality (IDEQ) erosion and sediment control BMPs which comply with the EPA approved Lower Boise River Total Maximum Daily Loads (TMDLs) and interim non-degradation requirements for Lower Boise tributaries listed as impaired waters by the IDEQ. The City, recognizing the benefits of stormwater pollution prevention for the community, also requires City construction projects which are not covered by the EPA CGP to complete and maintain an ESCP as specified in section 3.1.7.

1.6 PROGRAM BENEFITS

Clean receiving waters, such as creeks, streams, and rivers are a desirable and beneficial resource of the community. Keeping these water resources clean is necessary to maintain recreational activities, habitat preservation, and community aesthetics, as well as ensure high-quality uses for consumption and irrigation are preserved. Storm water quality is suspected to be a contributing source of unnecessary pollutant loading into receiving waters. If not addressed, storm water pollutants may negatively impact a community and its resources.

Through effective implementation of this CSWMP, the pollutant loading attributed to the City's construction activities will be reduced and local and regional surface water bodies will be cleaner. Clean water will enhance the quality of life by improving aesthetics and reducing potential risks associated with water quality. Many cities have found inadvertent benefits of enforcing storm water requirements. These benefits include:

1. Reductions in accumulated sediment and debris in storm drainage systems, thereby reducing the threat of flooding and the need for enhanced and unplanned maintenance.
2. Better control of wind-borne dust that can affect private property and public health.
3. Reduction of tracked sediment onto public surfaces that can create unsafe conditions for pedestrian traffic or make public areas less conducive to accessing businesses, homes, or public facilities.

In addition to aesthetic value, the CSWMP will help the City avoid potential regulatory fines by ensuring proper management of storm water at City construction sites. Fines can result from several sources including illicit discharges of polluted storm water and administrative violations such as improper development and implementation of a site SWPPP. In addition, civil penalties associated with citizen lawsuits are allowable under the CWA.

1.7 PROGRAM STRATEGY

Based on discussions with City staff, the CSWMP was developed with the following specific components to assist the City in managing storm water on City construction sites:

- Project Planning and Design;
- Construction Storm Water Management Standards;
- Compliance Reporting System;
- Inspection and Enforcement Program; and,
- Training Program.

1.7.1 Project Planning and Design

The CSWMP provides design review guidance for City staff and project teams to assist them in implementing the new requirements. The City provides training on this guidance for its staff to

promote effective storm water management. In addition, this guidance will provide for specific language to be included in the bid documents to address storm water management on all City construction projects

1.7.2 Construction Storm Water Management Standards

The CSWMP provides specific Construction Storm Water Management Standards to be implemented on all City construction sites. In addition to defining roles and responsibilities and a summary of the regulatory requirements, the standards will provide an outline of expectations for each City project as it develops through the design and construction process. The City will utilize the latest IDEQ's *Catalog of Stormwater Best Management Practices for Idaho Cities and Counties* as the reference for site runoff control measures and to guide in the design, installation and maintenance requirements for those measures.

1.7.3 Compliance Reporting System

The City will develop and maintain a Compliance Reporting System that will serve as an electronic database for the tracking of storm water compliance activity on City construction projects. The type of information contained in the database will include summaries of all inspections to include site location, date, inspector name, Prime Contractor, compliance rating, and identification of deficiencies and recommendations. Typically, this information will be tracked on a quarterly basis and be discussed amongst City staff during a quarterly construction storm water program meeting to identify trends and possible solutions for addressing any negative trends. As part of the compliance reporting system, the City may also develop an annual report of all activities conducted to assess success of the CSWMP.

1.7.4 Inspection and Enforcement Program

City staff will inspect City construction sites for compliance with City requirements for construction site runoff. If a violation at the construction site is found, the City will utilize a tiered system of enforcement actions, including staff guidance, notice letters, suspension of project, referral to the City Attorney, and if necessary, law enforcement. The City will evaluate this program for its implementation of storm water controls and, as needed, develop revisions to policies and procedures. City inspection and enforcement staff will be trained on the new policies and procedures. The City may, at its discretion, utilize independent third party inspectors on all City construction as another means of safeguarding against storm water violations.

1.7.5 Training Program

The City plans to develop and conduct training sessions for City staff on the basics of storm water management and compliance at City construction sites. The training will be developed and conducted by appropriate staff and/or outside consultants familiar with construction storm water management in the State of Idaho. With completion of appropriate training, City staff is authorized to conduct storm water inspections at City construction sites and review site-specific SWPPPs and ESCPs.

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2.0 PROJECT PLANNING AND DESIGN

2.1 OVERVIEW

This section describes how the City incorporates storm water management into the City construction planning and design processes. This section describes:

- The overall project planning, design and bid process associated with storm water management; and,
- Other considerations.

2.2 PROJECT DEVELOPMENT PROCESS

The City construction development process spans a period of time that begins with feasibility studies and ends with the completion of construction. The project development process includes the following three phases:

- Project Planning Phase;
- Project Design Phase; and
- Project Construction Phase.

2.2.1 Project Planning Phase

The City construction project planning phase focuses on identifying and clarifying specific City projects that provide practical solutions to water, wastewater, environmental, and other issues facing the City. As part of this process, the City will identify significant potential storm water issues and the planning of right-of-way needs for permanent design BMPs.

Significant storm water issues that could develop on City projects include the projects proximity to an impaired water body of the state, as identified from the IDEQ's 303d list of impaired water bodies. In addition, the City needs to determine if the construction is affected by a Total Maximum Daily Load report (TMDL) that could affect storm water management requirements. Finally, the City should identify any projects that might require work within a water body. In the event a project will take place in a water body, significant cost could result from extensive storm water BMP implementation and maintenance and, thus, should be planned within the budgeting process.

2.2.2 Project Design Phase

The project design phase includes the development of construction documents including plans, specifications and cost estimates for a particular project. It is during this phase that considerations for BMPs and implementation strategies are made.

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As part of the City's design phase, natural features, including trees, streams, wetlands, slopes and other features to be protected during construction will be identified in the drawings. The Design Consultant will also determine permits and or agreements required for project construction. The Design Consultant will submit to the City, for review and approval, a substantially complete project SWPPP or ESCP as described in Appendix B. A substantially complete SWPPP shall consist of all information required by the current CGP with the exception of specific Contractor information such as responsible person, certification, training information and any field changes that a contractor might make due to operational control of a project, all of which is to be provided by the contractor after bid awards and approvals, prior to any earth disturbing activities occurring.

As part of the City's design phase, the Design Consultant will develop a preliminary stormwater management strategy to include:

- Preliminary assessment of construction sequencing and stormwater management associated with each phase of construction, including determination of whether or not the project requires coverage under the EPA CGP, whether a SWPPP plan or an ESCP is required and if applicable, "Notice of Intent" (NOI) and "Notice of Termination" (NOT) coordination.
- Discussion of specific issues associated with the Endangered Species Act (ESA), the State Historic Preservation Office (SHPO), TMDLs and wetlands and what resources and materials the City will provide to the Contractor for their Notice of Intent submittal prior to construction (example letters are presented Appendix A).
- Development of the appropriate ESCP or SWPPP as required above, substantially complete for bid specifications.
 - SWPPP's shall be in color, hole punched and inserted into a hard cover three ring binder, must follow the formatting of the latest EPA SWPPP template, must be site specific, shall conform to the requirements in the current CGP and shall include water pollution control practices.
- Development of a detailed bid spec sheet for all SWPPP or ESCP elements on a per unit item basis to be included in the bid specifications document.
- Discussion of additional permits, right of way access, etc.

2.2.3 Project Construction Phase

The project construction phase includes the project bidding process on the construction plans and specifications and storm water management during project construction. Storm water management during construction of the project is described in Section 3.0 and in Appendix A of the CSWMP.

As part of the City construction project bid phase, the City will include Appendix A of the CSWMP as part of the bid set.

For projects which are required to be covered under the EPA CGP, both the City and Contractor are be responsible for submitting separate and complete NOIs to EPA. The contractor shall also submit to the City, copies of the EPA NOI Acknowledgment and Certification letters that are

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sent in response to its NOI submittal, as well as copies of the submitted correspondence letters verifying that the ESA, and SHPO requirements have been met.

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Project Planning and Design Fact Sheet	
<p>Goal Provide means for the City to include storm water management in the project planning and design process by:</p> <ol style="list-style-type: none"> a. Planning Phase: Identifying City construction projects that could significantly impact water quality without effective storm water management techniques. b. Design Phase: Requiring preliminary consideration and substantially complete design of SWPPP and/or ESCP plans and specs for BMPs, permits and agreements. c. Bid Phase: Inserting specific storm water management contract language and SWPPP and ESCP plans and specs into bid documents. 	
<p>Responsibility The City Department responsible for the project will ensure that storm water is considered in each phase of the planning and design process by conferring with the Public Works Environmental Division. Specifically, the Project Manager will ensure storm water requirements for planning and design are considered on each construction project.</p>	
<p>Implementation The City will continue implementing storm water management planning and design requirements into all City construction projects upon implementation of the revised CSWMP.</p>	
Measurable Goals	
Goal	Responsibility
PPD-1: Consider storm water management in planning process for 100 percent of City construction projects to include consideration of water quality impacts and cost.	City Project Managers
PPD-2: Identify on drawings natural features, including trees, streams, wetlands, slopes and other features to be maintained during construction. The Design Consultant will also determine permits and agreements required for project construction. This shall be completed for 100 percent of City construction projects requiring coverage under the CSWMP.	Design Consultant
PPD-3: Include Appendix D of the CSWMP in contract documents for 100 percent of City construction projects requiring coverage under the CSWMP.	Design Consultant, City Project Manager

3.0 CONSTRUCTION STORM WATER MANAGEMENT STANDARDS

The following section defines the construction storm water management standards which establish City expectations for the CSWMP. The section provides detailed information on the following topics:

- Administrative activities associated with construction storm water management;
- Roles and responsibilities of the City, Design Consultant, Contractor, and Third Party Inspector (if applicable) for construction storm water management; and,
- Overview of BMP guidance and BMP implementation strategy.

3.1 ADMINISTRATION ACTIVITIES

Administrative activities related to storm water management address both technical issues and specific permit requirements. These administrative activities are described below.

3.1.1 Pre-Construction

City staff will prepare themselves for addressing storm water issues on a specific project by becoming familiar with the scope of work and the site itself. The City staff prepares for storm water issues by:

- Ensuring that proper SWPPP and/or ESCP have been developed by the project Design Consultant.
- Ensuring that proper notifications have been filed with the EPA for projects requiring SWPPP;
- Meeting and reviewing documentation with the appropriate environmental and storm water personnel;
- Reviewing the contract requirements for storm water management; and
- Conducting a pre-construction meeting with the Contractor to discuss required storm water measures and requirements, as part of an overall project agenda. Depending on the project's size and complexity, an additional preconstruction conference may be used exclusively for discussing storm water control.

3.1.2 Ownership Scenarios

Regarding proper notification to the EPA, City construction projects could fall under several ownership scenarios that would dictate which agency takes the lead in ensuring compliance with stormwater management requirements. Under the various scenarios, several stakeholders could submit NOIs and be responsible for signing stormwater management inspection forms. To effectively manage the various ownership scenarios and stormwater management

responsibilities, Appendix B presents standard operating procedures (SOPs) for the following ownership scenarios:

- City project on City-owned property;
- City project on City-owned property utilizing a Construction Management Firm;
- City project in ACHD Right-of-Way;
- ACHD roadway project but City performing upgrades concurrently;
- City constructing ACHD project on ACHD's behalf as portion of City project;
- ACHD constructing City project on City's behalf as portion of roadway project and;
- Developer constructing project on behalf of City for reimbursement.
- Any other scenario where the City may be defined as an "Owner" or "Operator" as defined in the current version of the Construction General Permit (CGP) as published by the Environmental Protection Agency (EPA).

3.1.3 Submittal, Review and Approval of Storm Water Pollution Prevention Plans

A SWPPP is an implementation plan required under the CGP for addressing temporary impacts of construction activities upon water quality. The SWPPP contains project specific information related to the various storm water management measures during construction. The primary focus of the SWPPP is the description of the temporary BMPs to be deployed at the project site. It should be noted that a complete project SWPPP must be completed prior to the submission of project NOIs by the City and Contractor.

During the design phase, the Design Consultant is responsible to prepare a substantially completed SWPPP in accordance with the information in Appendix A. This SWPPP is to be submitted to the City for review and approval prior to inclusion into bid documents.

Just after Notice to Proceed is issued by City, the Contractor reviews and revises the substantially completed SWPPP with specific Contractor information such as responsible person, certification, training information and any field changes that a contractor might make due to operational control of a project, and provides a Final SWPPP to City staff for review and approval in accordance with Appendix A of the CSWMP manual . The Contractor shall base the fully complete SWPPP on the bid package SWPPP provided by the Design Consultant. The timeframes for SWPPP submittal, review, and re-submittal are specified in Appendix A . No earth disturbing activity, as defined by the current version of the EPA CGP, is to be performed until the Final SWPPP has been approved, all NOI's have been submitted and the appropriate waiting period defined by the CGP has been met. Copies of Contractor NOI submittal and EPA certification forms shall be submitted to the City for records.

Per the CGP, the SWPPP is required to be maintained on the project site throughout construction. At a minimum, the SWPPP shall be co-located with a copy of the CGP and the NOIs submitted to EPA. The SWPPP shall be located in a container clearly marked "SWPPP" for ease of locating the document for review.

3.1.4 Storm Water Pollution Prevention Plan Modifications

During construction, changes in conditions of the site or project may occur that require modifications to the SWPPP. These changes can include, but are not limited to: changes in construction plans, staging area or schedule modifications, new operator activity or control at the site or portion(s) of the site, changes in stormwater controls, unanticipated off-site drainage impacts, and accommodation of additional requirements imposed by EPA. The Contractor is required to modify the SWPPP to meet the requirements of the CGP.

The Contractor must incorporate all modifications into the approved SWPPP. Modifications to the SWPPP are entered into a modifications log contained in the SWPPP. This log is a reflection of dynamic nature of construction activities at the site. At a minimum, all City construction sites are anticipated to prepare modifications to both reflect changes in the timing of operations delays or accelerations, and to meet the SWPPP modification requirements in the CGP.

The Project Manager or designee will review the Contractor's proposed SWPPP modification for completeness and conformance with the revised conditions, and give written approval to the Contractor if the modification is acceptable. The Project Manager or designee certifies all modifications to the SWPPP.

3.1.5 Applicability of Industrial Storm Water General Permit

In general, the City's storm water discharges associated with City construction projects are regulated by the CGP and the City does not apply for coverage under the NPDES Multi-Sector General Permit. However, in certain construction-related situations, the Contractor is required to apply for and operate under the Multi-Sector General Permit in addition to having coverage under the CGP. These situations include industrial operations (e.g., batch plants) located outside the City's project limits and industrial operations that service more than one project.

3.1.6 Project Completion

The City may authorize the removal of the Contractor from further storm water management obligations once the City construction is completed. Contractor must submit a completed "Contractor Request to File Project Notice of Termination" for City review. The Contractor Request to File Project Notice of Termination is included in Appendix D. Upon completion of construction, standard practice dictates the Contractor submits their NOT thereby shifting responsibility for final stabilization to the City. The NOT serves as notification that construction activities with a potential to release pollutants are complete and that the construction site is stabilized in accordance with the provisions of the CGP. Before approving a Contractors request to File Project NOT and prior to submitting the City's NOT and therefore the final project NOT, the Contractor and City Duly Authorized representatives must do the following:

- Determine that all areas not covered by permanent structures have achieved final stabilization as defined by the EPA CGP;

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- Determine if temporary BMPs such as silt fences or other measures that are not a part of permanent erosion control shall be removed; and,
- Determine that the SWPPP is wholly complete including all inspection records and signatures; and,
- Determine if any additional work within the scope of work and available resources are required.

When projects with a SWPPP have been determined to be complete, the City Engineer or authorized designee shall submit a NOT to EPA.

3.1.7 Erosion and Sediment Control Plans

For City construction projects that do not require coverage under the CGP, the Design Consultant shall prepare an Erosion and Sediment Control Plan (ESCP) in accordance with Appendix E. The ESCP will be a simplified version of the SWPPP associated with larger projects and include the following components:

- Project name, location map, and responsible Contractor;
- Project description;
- Identification of potential impacts on water quality; and,
- Plan drawings depicting storm water management strategy, including the management of wastes and non-storm water discharges.

For City construction projects that do not require coverage under the CGP, and are constructed entirely within the Ada County Highway District (ACHD) right of way, the Design Consultant shall prepare the Erosion and Sediment Control Plan (ESCP) to meet ACHD's storm water management requirements identified by ACHD.

The ESCP will be submitted to the City during the design phase for approval into the bid package. Prior to the beginning of construction activities, the contractor shall review and revise the ESCP as necessary and submit to the City for final approval. The City will review and approve the ESCP prior to the beginning of construction. The ESCP shall be updated as required throughout construction phase using a similar modification process to that for SWPPPs. The ESCP will be active on each City construction project until the City accepts the work as complete. An ESCP checklist is provided in Appendix E. Additionally, the contractor shall obtain all necessary approvals from ACHD for projects entirely in the ACHD right-of-way.

3.2 ROLES AND RESPONSIBILITIES

The Public Works Engineering Division and other City Departments (such as the Parks & Recreation Department) administer construction projects while the Environmental Division ensures regulatory compliance with Federal and State programs such as the EPA CGP. The key City positions responsible for implementing storm water prevention within the City are as follows:

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Public Works Director: The Public Works Director is responsible for implementation of policies and procedures, and management of personnel and equipment of the City's Public Works Department. This includes implementation of elements of the City CSWMP relevant to certain construction activities.

City Engineer: The City Engineer is responsible for making project-related notifications and certifications required for storm water, as described elsewhere in this section.

City Surface Water Program Administrator: The Surface Water Program Administrator is responsible for ensuring regulatory compliance with Federal and State programs such as the EPA CGP; and providing project-related reviews, and notifications required for storm water activities as described elsewhere in this section.

City Project Manager: The City Project Manager is the City's representative who administers construction contracts. The City Project Manager arranges for the review and approval of the ESCP or SWPPP and notifies the Contractor of any required changes. The Project Manager will perform the preliminary reviews of the project ESCP or SWPPP and forward recommendations on to the Surface Water Program Administrator or Designee for final approval and certification. The City Project Manager makes decisions regarding the acceptance of materials furnished, work performed and exercises contractual authority to direct the Contractor. The City Project Manager or designee certifies all modifications made to the ESCP or SWPPP after it has been made final. The City Project Manager for non-Public Works Department projects may also serve as the City Inspector.

City Inspector: The City Inspector is the City's site representative during project construction that meets with the Contractor on a regular basis to address storm water management issues on the project. The City Inspector is given authority from the City Engineer to ensure that storm water controls are implemented, inspected, and maintained on construction sites as specified in the approved ESCP or SWPPP. With signatory authority to certify various storm water related documents, the City Inspector will ensure the City Engineer or Designee and Project Manager are well informed of storm water management issues on the project. The City Inspector is authorized to approve modifications, or suspend construction work that is actively contributing to pollutant discharges from the site or poses an immediate threat to receiving water quality; the City Inspector will immediately confer with the City Engineer, Surface Water Program Administrator or Designee before taking further action or lifting the suspension. As part of the Inspector duties, the City Inspector will attend storm water management courses for instruction on how to properly inspect a construction site for compliance with storm water management requirements.

Contractor: The Contractor is responsible for carrying out the construction contract pursuant to the plans, specifications and all applicable permits. The contract requires a Contractor to develop and implement elements of the storm water requirements subject to review and approval by the City Engineer and/or Designee. These activities include:

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- Reviewing, and revising the substantially complete ESCP or SWPPP bid document and preparing the Final ESCP or SWPPP subject to the approval of the City;
- Modifying and updating the ESCP or SWPPP subject to the approval of the City Project Manager or designee;
- Implementing the approved ESCP or SWPPP; and
- Inspecting, monitoring, and maintaining construction site BMPs.

Third Party Storm Water Inspections: The Surface Water Program Administrator or an independent Third Party Inspector may make storm water inspections of City job sites as necessary for auditing purposes of this program. A third party inspector is an outside party hired by the City to assist with storm water management on specific projects. The third party inspector may be responsible for auditing storm water management on specific construction sites to include review of the ESCP or SWPPP, inspection reports and procedures, and overall compliance with the CGP. Primary means for audits may consist of monthly, unannounced inspections. Prior to conducting any site inspection, the Inspector will become familiar with the project location and specifications that govern the construction site. Inspectors will conduct inspections of all construction sites in a professional manner and document all findings and recommendations within an inspection form. A copy of the completed inspection form and any photographs relevant to the inspection shall be provided to the City Engineer, Surface Water Program Administrator, or their designee within 48 hours of completing the inspection.

3.3 BMP STRATEGY AND SELECTION PROCEDURES

A comprehensive system of construction BMPs should meet the following objectives:

- ***Diversion:*** Divert storm water run-on from contacting site operations by re-directing it around the construction site.
- ***Mitigation:*** Mitigate storm water induced erosion and sedimentation that occurs within the site which could include directing the run-on through the project in a manner that does not add pollutants as a result of contact with project.
- ***Elimination:*** Reduce or eliminate sediment and other pollutants associated with construction activities from transport off site in storm water and authorized non-storm water discharges.
- ***Natural Buffers:*** Maintain natural buffers and their ability to divert, mitigate and eliminate pollution runoff in accordance with the CGP.

Successful implementation of BMPs for erosion and sediment control, non-storm water discharges and pollution prevention is dependent upon the inspection, monitoring, and maintenance practices of the BMPs to ensure functionality and longevity. When defining a strategy of implementation of temporary erosion and sediment controls for City construction sites, the strategy must consider drainage flow paths (conveyances and topography), climate, soil conditions, proximity to surface water bodies, and the type of construction activities anticipated.

The City may implement, as appropriate, industry standard BMP's including those referenced in the current IDEQ BMP Manual on City construction sites. The temporary control practices are consistent with the BMPs and control practices required under the CGP, and are intended to

implement the technical requirements of the CGP. The selected BMPs are directed at reducing or eliminating pollutants in storm water discharges.

The individual BMPs listed in the current IDEQ BMP Manual, as being applicable to a typical construction activity, may not necessarily be appropriate for all projects involving the noted activity. For example, not all projects will have on-site vehicle fueling and maintenance operations; however, those that do conduct the operation are required to conduct the operations in a manner consistent with the BMP identified in the IDEQ BMP Manual. In addition, there are instances where project and site conditions require deviation from the noted BMPs described in the IDEQ BMP Manual. However, the practices listed and described in the IDEQ BMP Manual are typical of those implemented on a project-specific basis.

Project and site conditions may allow implementation of other innovative approaches to construction pollution management in addition to those set forth in the IDEQ BMP Manual. The City will continue to encourage experimentation and innovation on deploying such measures to minimize pollution; however, the innovative measure must be used in specific applications. Information gathered from the use of innovative measures is analyzed and reported in the Annual Report described in Section 4.0. Through feedback stemming from these enhanced efforts, the City expects that the statewide construction management practices identified herein will continue to evolve and improve in their effectiveness in managing the quality of storm water discharges on City construction sites.

3.4 BMP IDENTIFICATION

City project Design Consultants will consider BMPs throughout the design of the project. The existing conditions at the construction site, including topography, drainage, and soil type will be assessed. Natural features, including trees, streams, wetlands, slopes and other features to be protected during construction will be identified on the drawings. BMPs will be considered when estimating the cost of a project, so that adequate funding is allocated in the budget. The Design Consultant will also determine permits and or agreements required for project construction.

3.4.1 Idaho Department of Environmental Quality Best Management Practice Manual Description

Rather than develop a separate BMP Manual for use on City projects, the City references the current IDEQ BMP Manual for use on all City construction projects. The IDEQ BMP Manual provides detailed guidance on storm water regulations and requirements and the use of storm water BMPs. The manual provides descriptions and recommendations for temporary BMPs associated with construction activities as well as permanent BMPs associated with management of storm water over the design life of the project. Both temporary BMPs associated with construction activities and Permanent BMPs can be found in the DEQ Manual.

The IDEQ BMP Design Manual presents a discussion of each temporary BMP category which are to be used by the City and its Contractors on construction projects. The following sections of the IDEQ BMP Manual discuss various stages and techniques of temporary BMPs used for construction projects.

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- General Construction Site Best Management Practices
- Housekeeping Best Management Practices;
- Slope Protection and Stabilization Best Management Practices
- Storm Drain and Channel Protection Best Management Practices
- Sediment Collection and Runoff Diversion Best Management Practices

It should be noted that the IDEQ Manual presents a detailed discussion of specific components of each BMP including description, applications, limitations, targeted pollutants, design parameters, construction guidelines, and maintenance. The IDEQ BMP manual may be found at: <http://www.deq.idaho.gov/water-quality/wastewater/stormwater.aspx>

Other state and nationally recognized BMPs may be approved upon submittal, review and approval by the City Engineer, Surface Water Program Administrator and Project Manager as needed.

3.5 MONITORING REQUIREMENTS

In addition to the BMP standards required above, construction projects discharging to waters identified on the CWA section 303(d) list as being impaired are required to comply with current CGP conditions specific to the State of Idaho which may include monitoring requirements.

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Construction Storm Water Management Standards Fact Sheet																					
<p>Goal Provide specific guidance for City staff and Contractor for meeting storm water management requirements associated with City construction projects. The guidance will serve to reduce runoff of sediments and construction site wastes by:</p> <ol style="list-style-type: none"> a. Describing the submittal, review, and approval process for project SWPPPs and ESCPs. b. Describing the contents of ESCPs for projects with less than 1 acre of disturbed soil. c. Defining roles and responsibilities of City staff, Design Consultants and Contractor personnel in construction storm water management. d. Presenting a storm water management strategy to be applied to each project and application of BMPs. e. Referencing the IDEQ BMP Manual and its BMPs. 																					
<p>Responsibility The City's Public Works Engineering and Environmental Divisions will ensure that construction storm water management standards are met on all City construction projects. Specifically, the Duly Authorized representative will ensure SWPPPs and/or ESCPs are properly developed and updated based on the strategy highlighted in the City storm water standards. Responsibility for various components of the standards are as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%; text-align: center;">Item</th> <th style="text-align: center;">Responsibility</th> </tr> </thead> <tbody> <tr> <td>▪ Submission/Certification of project NOIs (one for City, one for Contractor).</td> <td>City Surface Water Program Administrator, City Engineer; and Contractor</td> </tr> <tr> <td>▪ Develop and submit project SWPPP or ESCP for review and approval by the Surface Water Program Administrator.</td> <td>City Design Consultant</td> </tr> <tr> <td>▪ Review project SWPPP or ESCP.</td> <td>City Project Manager, City Surface Water Program Administrator</td> </tr> <tr> <td>▪ Approve project SWPPP or ESCP.</td> <td>City Surface Water Program Administrator</td> </tr> <tr> <td>▪ Review and revise bid document SWPPP/ESCP and develop and submit Final SWPPP/ESCP for City review and approval prior to construction.</td> <td>Contractor</td> </tr> <tr> <td>▪ Review Final SWPPP/ESCP.</td> <td>City Surface Water Administrator</td> </tr> <tr> <td>▪ Approve Final SWPPP/ESCP amendments.</td> <td>City Surface Water Administrator</td> </tr> <tr> <td>▪ Maintain an updated SWPPP on site at all times along with a copy of the CGP and NOI.</td> <td>City Project Manager, City Inspector and Contractor</td> </tr> <tr> <td>▪ Submission/Certification of the NOTs.</td> <td>City Surface Water Program Administrator, City Engineer and Contractor</td> </tr> </tbody> </table>		Item	Responsibility	▪ Submission/Certification of project NOIs (one for City, one for Contractor).	City Surface Water Program Administrator, City Engineer; and Contractor	▪ Develop and submit project SWPPP or ESCP for review and approval by the Surface Water Program Administrator.	City Design Consultant	▪ Review project SWPPP or ESCP.	City Project Manager, City Surface Water Program Administrator	▪ Approve project SWPPP or ESCP.	City Surface Water Program Administrator	▪ Review and revise bid document SWPPP/ESCP and develop and submit Final SWPPP/ESCP for City review and approval prior to construction.	Contractor	▪ Review Final SWPPP/ESCP.	City Surface Water Administrator	▪ Approve Final SWPPP/ESCP amendments.	City Surface Water Administrator	▪ Maintain an updated SWPPP on site at all times along with a copy of the CGP and NOI.	City Project Manager, City Inspector and Contractor	▪ Submission/Certification of the NOTs.	City Surface Water Program Administrator, City Engineer and Contractor
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<p>Implementation The City will implement all components of the Construction Storm Water Management Standards for all City construction projects.</p>																					
Measurable Goals																					
Goal	Responsibility																				
CSTD-1: Project SWPPPs/ESCPs will be developed by Design Consultant and reviewed and revised by selected Contractor and be based on the EPA SWPPP template or the ESCP items in Appendix E.	City Project Manager in coordination with City Surface Water Program Administrator																				
CSTD-2: The IDEQ BMP Manual will be used as guidance for selection and implementation of construction BMPs.	All Parties																				
CSTD-3: City staff will ensure roles and responsibilities are defined during project kickoff meeting.	City Project Manager																				

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4.0 COMPLIANCE REPORTING SYSTEM

To allow the City to be more proactive regarding storm water management at City construction sites, the City will develop and implement a compliance reporting system. The system focuses on tracking storm water management information and proactively identifying potential problems before they result in unwanted stormwater discharges and/or violations of the CGP. Quarterly reports may be generated to summarize the activities performed throughout a reporting period. Quarterly reports may be combined to provide an Annual Construction Storm Water Compliance Report. The quarterly reports and the annual report will include the following:

- The number of projects that are occurring within the City needing either ESCP or SWPPP coverage.
- The status of compliance with the CGP requirements;
- An assessment of the appropriateness and effectiveness of the identified BMPs, including the use of innovative measures not described in IDEQ BMP Manual;
- Status of the identified measurable goals;
- Results of information collected and analyzed, including inspection data collected from weekly site inspections and any third party inspections;
- Any proposed change(s) to the CSWMP along with a justification of why the change(s) are necessary; and,
- A change in the person or persons implementing and coordinating the CSWMP.

To track the necessary information and assist the City in identifying storm water management trends at City construction sites, the City will develop a storm water compliance system that can track storm water management information on a quarterly basis. The system will include inspection information to track each project's compliance with the CSWMP and identify trends and issues where further training or attention may be required. The tracking system will be developed and managed by the Environmental Division of Public Works and the Surface Water Program Administrator

Upon completion of a storm water inspection the City Inspector and the Contractor will be required to complete an inspection report, including photographs (if applicable), within 24 hours. Once signed, the Inspector will forward a copy of the inspection report to the Surface Water Program Administrator, manager of the Storm Water Compliance Reporting System.

Another area of compliance required by the CGP is that the City maintains records of construction projects requiring CGP coverage for at least 3 years. This includes all project SWPPPs, SWPPP modifications, weekly inspection reports, and any other documentation associated with storm water management. As part of the Compliance Reporting System, these files will be kept at the City Public Works Department. Additionally, the City must submit any and all records to the EPA upon request and must make these records available to the public during regular business hours.

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Compliance Reporting System Fact Sheet	
<p>Goal Provide means for City to track compliance with the CSWMP on City construction projects and proactively correct issues by:</p> <ol style="list-style-type: none"> a. Tracking the status of identified measurable goals associated with each section of the CSWMP. b. Tracking compliance with the CGP through data collected from construction storm water inspection reports. c. Update the CSWMP and its components to address areas of ineffectiveness or improve the overall plan. 	
<p>Responsibility The City's Public Works Environmental Division will ensure that a compliance reporting system is developed and in place that tracks compliance information on all City construction projects. Specifically, the City Surface Water Program Administrator will ensure staff inputs data and track storm water management trends.</p>	
<p>Implementation The City will develop a system and track storm water compliance information for City construction projects.</p>	
Measurable Goals	
Goal	Responsibility
CRS-1: Enter data from each storm water compliance inspection for each project.	City Surface Water Program Administrator
CRS-2: Complete quarterly storm water compliance reports to assess effectiveness of program.	City Surface Water Program Administrator
CRS-3: Complete annual storm water compliance report by summarizing quarterly performance and recommending changes to the CSWMP.	City Surface Water Program Administrator

5.0 INSPECTION AND ENFORCEMENT PROGRAM

The City inspects City construction sites through its Public Works Engineering Division as well as other Departments, for compliance with CSWMP requirements for construction site runoff. If a violation at a construction site is found during an inspection, the City will utilize a tiered system of enforcement actions including notification of the Contractor, suspension of project at contractor's expense, referral to the City Attorney and if needed, law enforcement. City inspection staff are trained on the inspection policies and procedures associated with this CSWMP. The City will also utilize a tracking system for violations as described in Section 4.0.

5.1 INSPECTIONS

City's staff will perform storm water management inspections on City construction sites. These inspections are crucial for ensuring the BMPs are properly maintained and functional. The inspections may reveal that additional BMPs are needed or that existing BMPs can be removed; however, site integrity for storm water pollution prevention must be maintained. In addition, inspections can help in the planning of storm water BMPs for activities not yet implemented, and can help in the formulation of amendments to the SWPPP.

The City implements construction site inspections for all activities related to storm water control. The temporary control practices deployed on construction sites are regularly inspected coincident with the construction activities that the BMPs are chosen to address. Consequently, storm water issues are inherent to inspections conducted for the construction operation itself. In addition, the designated Inspector(s) conducts routine inspections of the site to verify the implementation, functionality, maintenance and general effectiveness of the BMPs. It is recommended that these inspections occur with the Contractor to avoid disputes and agree upon any needed corrective actions. Improperly installed or damaged BMPs shall be corrected immediately. However, the Contractor may provide a written solution that differs from that recommended by the City Inspector. This solution will be reviewed by the Surface Water Program Administrator, or designee for consideration. If in the professional judgment of the Surface Water Program Administrator or designee the solution will not pose a risk to water quality, then it may be approved with authorization in writing.

Detailed inspection requirements can be found in the CGP; however, the following provides an overview of requirements associated with the City storm water management inspections for projects required to have a SWPPP or ESCP:

- Storm water inspections will occur once every 7 days to comply with City standards and the requirements of the CGP.
- Inspections will include review of the SWPPP to ensure it is current and represents existing conditions in the field.
- All storm water BMPs will be inspected for proper installation, maintenance, and functionality.

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- All deficiencies identified in the inspection shall be addressed within 7 days of the inspection.
- All Action Items not addressed within the 7-day period require an explanation from the Contractor.

City staff will utilize an inspection form, similar to that presented in Appendix F, which meets the inspection requirements of the CGP. The inspection forms will be completed and signed by the City staff and Contractor. The signatures must match that of the person(s) who were provided signatory authority via official designation on letterhead as a duly authorized representative which was included in the final SWPPP, or those identified in an ESCP as the responsible person. Once an inspection is complete, the City will forward a signed copy to the Contractor (if not present for inspection) to ensure the Contractor is properly informed of any Action Items identified during the inspection.

5.1.1 Inspection Compliance Rating Criteria

The results of each inspection recorded on the appropriate checklist with a cover page that summarizes the findings of the inspection. This project information summarizes the overall effectiveness of BMPs on the project and critical areas that may be in need of attention. Inspectors assign a numeric rating that identifies overall project compliance and may be used to adjust project priority status, if necessary. The rating represents a composite assessment of the following factors: level of construction activity, potential for discharges, extent of discharges observed, and implementation of BMPs.

1 Rating

There are no significant deficiencies that require correction. Criteria meeting this rating may include:

- The approved SWPPP appropriately addresses all categories of BMPs; is applicable to the current project operations and season; and is complete, to date, including all signatures and inspection records.
- Appropriate treatment control provided for dewatering operations.
- Non-storm water and waste management BMPs properly implemented.
- Sediment tracking is minimal to non-existent.
- No evidence of wind erosion.
- All temporary soil stabilization BMPs implemented in accordance with the project's SWPPP requirements.
- Sediment controls are implemented in accordance with the approved SWPPP.

2 Rating

The project has minor deficiencies. The Inspector will list each of the minor deficiencies and can include corrective actions to be taken prior to the next scheduled inspection. Minor deficiencies include the following:

- Approved SWPPP does not reflect current operations and a modification is needed.
- Any non-storm water or waste management BMPs improperly maintained.
- Soil stabilization or sediment controls are not properly maintained.
- Evidence of active wind erosion on unstabilized slopes/stock piles.
- Minor tracking less than approximately 25 feet from project entrance or exit points.
- Site inspections by project staff are not being conducted in accordance with expected frequencies, and/or inspection forms are incomplete.

3 Rating

Excessive minor deficiencies and/or major deficiencies are encountered. An inspection with this rating may be cause for the City Inspector to suspend the project at Contractor's expense until the deficiency(ies) is(are) corrected. The deficiency(ies) shall be corrected before the onset of precipitation. If the Contractor fails to correct the deficiency(ies) by the agreed date or before the onset of precipitation, the City may correct the deficiency(ies) and deduct the cost of correcting the deficiency(ies) from the total contract amount. This rating will be applied if either a total of six or more minor deficiencies requiring correction are observed and/or major deficiencies exist on the project. Major deficiencies are defined as follows:

- Approved SWPPP does not reflect current operations and modification of the document is past due or needed as soon as possible.
- Hazardous materials or waste is stored within the project without implementation of BMPs.
- Any discharge of sediment or other deleterious substances resulting from dewatering operations conducted without implementation of required BMPs for dewatering.
- Major or excessive sediment tracking from construction equipment or vehicles from project entrances or exits.
- Expansion of the active disturbed soil area limit without City written approval.
- Soil stabilization and sediment controls are not installed in accordance with applicable construction site (BMPs) manual.
- Dust from construction visibly blowing off the site and into drainage conveyances or adjacent water bodies.

4 Rating

There are critical deficiencies that would likely result in a violation of the permit if a storm water runoff event were to occur. The City Inspector will suspend the project at Contractor's expense until the deficiency(ies) is(are) corrected. The Inspector will note the deficiencies and make recommendations for corrective action. The deficiency(ies) shall be corrected before the onset of precipitation. If the Contractor fails to correct the deficiency(ies) by the agreed date or before the onset of precipitation, the City may correct the deficiency(ies) and deduct the cost of correcting the deficiency(ies) from the total contract amount. Critical deficiencies are defined as follows:

- No approved SWPPP.
- Any observed discharge of storm water or non-storm water from the project that, in the judgment of the Inspector, is generated by the construction activity, and is uncontrolled.
- Absence of linear barriers and/or perimeter controls required by the applicable BMP implementation manual.
- There are identified storm water inlets or receiving waters within or adjacent to the project site in close proximity to disturbed areas without control measures in place that pose an immediate threat of untreated storm water discharges.
- Working in an active stream channel or other water body without proper implementation of required BMPs.
- No corrective action taken for potential hazardous materials / waste deficiencies noted in previous inspection that was rated a 3 or greater.

5.1.2 Contractor Participation

The City requires its Contractors to be present during City storm water inspections for compliance with CSWMP. To ensure a team approach to implementation and functioning of storm water pollution control practices, the Contractor is to regularly join City staff during inspections and maintain water pollution control practices identified in the SWPPP or ESCP as required in the CSWMP. By attending weekly storm water inspections, the City and Contractor can promote coordination and concurrence on observations thereby expediting resolution of possible storm water management issues. Upon completion of each weekly storm water inspection, the Contractor shall sign the inspection form acknowledging observations, maintain a copy of the inspection report on site and address any action items identified in the inspection report within 1 week (or sooner, if specified by City Inspector) of the inspection report and prior to the next predicted rain event.

5.1.3 Third Party Inspections

Third Party Inspections may be performed by the Surface Water Program Administrator or an outside party hired by the City to assist with storm water management on specific City construction projects. The Third Party Inspections are performed to audit storm water management on specific construction sites to include review of the SWPPP or ESCP, inspection

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reports and procedures, and overall compliance with the CSWMP. The inspections may be unannounced. The Third Party Inspections will utilize inspection forms, as referenced in Appendix F. Prior to conducting any site inspection, the Inspector will become familiar with the project location, progress and specifications that govern the construction project. Inspectors may conduct inspections of construction sites and document all findings and recommendations within an inspection form. A copy of the completed inspection form and any photographs relevant to the inspection shall be provided to the City Engineer, and Surface Water Program Administrator or their designee within 48 hours of completing the inspection.

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Inspection and Enforcement Program Fact Sheet	
<p>Goal Conduct Storm Water Management Inspections at City construction sites to meet the requirements of the CSWMP and CGP, and proactively manage storm water to avoid issues of non-compliance by:</p> <ol style="list-style-type: none"> a. Conducting inspections in a timely and effective manner to proactively manage project runoff. b. Utilizing the City Storm Water Inspection Form including the City's compliance rating system. c. Requiring the Contractor to join City staff performing storm water inspections for concurrence with observations. d. Utilizing Third Party Inspections to audit City construction projects for compliance with the CGP. 	
<p>Responsibility The City's Engineering and Environmental Divisions will ensure that City Inspectors are trained on inspection procedures and conducting inspections as required by the CGP. City Inspector's will be responsible for carrying out inspections in a timely and professional manner. The City's Inspector will ensure the Contractor is addressing action items identified through the inspection program.</p>	
<p>Implementation The City will initiate the storm water inspection procedures.</p>	
Measurable Goals	
Goal	Responsibility
IEP-1: Inspections will occur on 100 percent of City construction projects that require development of a SWPPP or ESCP.	City Engineer and/or Designee
IEP-2: The City may retain an outside consultant to perform third party inspections on 100 percent of construction projects that require development of a SWPPP or ESCP.	City Engineer, City Surface Water Program Administrator and/or Designee
IEP-3: A Contractor representative will be present for all City Storm Water Inspections.	City Inspector and Contractor
IEP-4: The City and Contractor will work together to address all action items identified in the City and Third Party Inspections prior to the next inspection.	City Inspector and Contractor

6.0 TRAINING PROGRAM

To promote a proactive approach to storm water management and ensure compliance with the CSWMP on City construction projects, the City has developed a construction storm water management training course for key City staff involved in the storm water management process. The City training will include classroom instruction on the CSWMP and EPA CGP requirements. Specific training topics may include the following:

- Brief history of CWA and past violations in Idaho;
- Role of the City, DEQ, EPA, and Contractor in storm water management for projects in Idaho;
- Basic principles of erosion, sediment control, and non-storm water/waste management control;
- City and State Storm Water related Standard Plans and Specifications and BMP Manual;
- Selection and implementation of erosion control, sediment control, and non-storm water management/waste; management control BMPs;
- How to review and approve a SWPPP based on Idaho Transportation Department and EPA requirements and guidance manuals; and,
- BMP inspection and maintenance program.

The City intends to train all of the Department staff involved in the CSWMP.

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Public Works Training Program Fact Sheet	
<p>Goal To train City Public Works staff on the construction storm water management requirements of the CSWMP and CGP by:</p> <ul style="list-style-type: none"> a. Developing a storm water management training curriculum on the requirements of the CGP and focused on the components of a project SWPPP. b. Delivering training to all required staff. 	
<p>Responsibility The Surface Water Program Administrator and/or Designee will ensure the storm water management training curriculum is completed in a timely and thorough manner.</p>	
<p>Implementation The City will complete construction storm water management training on an on-going basis to provide for updates to requirements and technologies as well as for new City staff.</p>	
Training Program Fact Sheet	
Measurable Goals	
<p>TP-3: Provide the storm water management training course for all newly hired pertaining employees and existing employees requiring storm water management training on an annual basis as necessary for pertinent updates.</p>	<p>City Surface Water Program Administrator and/or Designee</p>

APPENDICES

APPENDIX A

WATER POLLUTION CONTROL SPECIFICATIONS

APPENDIX B

STANDARD OPERATING PROCEDURES MATRIX

APPENDIX C
ENVIRONMENTAL COMPLIANCE LETTERS

APPENDIX D

CONTRACTORS REQUEST TO FILE NOTICE OF TERMINATION (NOT) FORM

APPENDIX E

EROSION AND SEDIMENT CONTROL PLAN CHECKLIST

APPENDIX F

SAMPLE STORMWATER INSPECTION FORMS