



Construction Program Manual

Stormwater Program

Revision: 0, 7-2019
Revision 1, 11-2019
Revision 2, 12-2019
Revision 3, 3-2020
Revision 4, 4-2020
Revision 5, 4-2020
Revision 6, 11-2020

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INTRODUCTION

Protecting the quality of stormwater runoff is important to the city of Thornton (City), and is required by the Colorado Discharge Permit System (CDPS) Regulations. The construction program manual is designed to assist city staff in assessing if good engineering, hydrologic and pollution control practices are being utilized for construction activities within the Municipal Separate Storm Sewer (MS4) in compliance with City Code and the Phase II MS4 Permit issued by the Colorado Department of Public Health and Environment (CDPHE). The CDPHE, Water Quality Control Division, through the MS4 Permit requires the city of Thornton to develop a program to reduce or prevent the discharge of pollutants from construction activities and satisfy the requirements of the Colorado Water Control Act and the CDPS regulations (Colorado Regulation 61).

PURPOSE

The City of Thornton has developed this program manual to provide general guidance on reviewing, inspecting, and enforcing construction activities within the MS4 to reduce or prevent the discharge of pollutants.

Revisions to this program manual may be adopted as often as needed. The manual may change without notice if it is found to no longer be effective and/or compliant with the city's MS4 permit requirements.

This manual shall be regarded as the minimum requirements needed to comply with the city's MS4 permit.

DEFINITION OF TERMS

Several definitions are printed here for convenience, but this is not intended to be an all inclusive list. Terms in the procedure shall generally have the meaning assigned to them in the Code of Colorado Regulations.

Capital Improvement Project (CIP): any and all construction projects funded or partially funded by the City.

Control Measures (CM): any best management practice or other method used to prevent or reduce the discharge of pollutants to state waters. Control measures include, but are not limited to, best management practices. Control measures can include other methods such as the installation, operation, and maintenance of structural controls and treatment devices. Control Measures also include treatment requirements, operating procedures and practices to control site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Construction: the implementation of a proposed plan of improvements by an operator that may include excavating, demolition, site grading, utility work, paving, building, and other activities that may contribute to the disturbance of land and the potential to elevate the level of environmental impacts, erosion and sediment. Activities that include routine maintenance to maintain original line and grad, hydraulic, capacity, or original purpose of the facility are not considered construction activities.

Contiguous: construction activities that are related and may be taking place at different times on different schedules but located within ¼ mile to each other.

Disturbance Area: area affected by construction including, but not limited to: grubbed areas, grading and excavation areas, staging areas, lay down areas, vehicle and equipment parking/storage/staging areas, construction areas, demolition areas, haul roads, access roads, stockpile areas, borrow areas, and trash enclosure areas.

Final Stabilization: all ground surface disturbing activities at the site have been completed including removal of all temporary erosion and sediment control measures, and all disturbed areas have been either built on, paved, or a uniform vegetative cover has been established with an individual plant density of at least 70 percent of pre-disturbance levels, or equivalent permanent, physical erosion reduction methods have been employed. Re-seeding **alone** does not qualify.

Full Level Inspection: an inspection assessing the adequacy of CMs and overall site management, performed by an inspector to determine compliance with the requirements of the Stormwater Management Plan (SWMP) and sediment and erosion control plans. These inspections also include reviewing inspection reports, SWMP, and site plan documentation.

Illicit Discharges: any discharge to a municipal separate storm sewer that is not composed entirely of stormwater except the following: discharges specifically authorized by a CDPS or NPDES permit, and discharges resulting from emergency firefighting activities.

Larger Common Plan of Development or Sale: is a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules, but remain related.

Examples include:

- 1) Phased projects and projects with multiple filings or lots, even if the separate phases or filings/lots will be constructed under separate contracts or by separate owners (e.g., a project where developed lots are sold to separate builders);
- 2) A development plan that may be phased over multiple years, but is still under a consistent plan for long-term development; and
- 3) Projects in a contiguous area that may be unrelated, but still under the same contract, such as construction of building extension and a new parking lot at the same facility, if the project is part of a common plan of development or sale.

Notice of Non-compliance (NONC): a written notice of violations documented on a report, this constitutes a “Non-compliant” inspection for the site. Site conditions that constitute violations include but are not limited to; critical CMs that are not installed, CMs that are not installed correctly, failure to implement CMs to effectively control tracking onto roadways, and fuel leaks/spills that have not been properly remediated. Significant violation status may also be assigned to instances or areas of repeated neglect and/or deficiencies from previous reports that have not been adequately addressed.

Notice of Violation (NOV): a written notice of violation stipulating the nature of the violation and the required corrective action.

Operator: the entity that has day-to-day supervision and control of activities occurring at the construction site. This can be the owner, the developer, the general contractor or the agent of one of these parties, in some circumstances. It is anticipated that at different phases of a construction

project, different types of parties may satisfy the definition of 'operator' and that the permit may be transferred as the roles change.

Site Plans: Also known as construction stormwater site plans, sediment and erosion control plans, stormwater pollution prevention plans, drainage reports, drainage plans, stormwater management plans, drainage and erosion control plans, etc.

Stop Work Order (SWO): a written notification given to the Operator to cease all on-site construction activities for repeated unresolved NOV's. Stop Work Orders require immediate stop of all construction activities, and remediation of all violations, before construction activities can resume.

Violations: activities or conditions, which endanger public health or result in a documented impact on water quality. Violations may also include: evidence of a discharge of pollutants, off-site release of sediment, concrete washout violations threatening a storm sewer or drainage way, failure to address a Notice of Violation (NOV) within the time allotted, or operating without a **CDPS General Permit for Stormwater Discharges Associated with Construction Activities** when one is required.

Waters of the State: means any and all surface and subsurface waters, which are contained in or flow in or through this State, but does not include waters in sewage systems, waters in treatment works of disposal systems, waters in potable water distribution systems, and all water withdrawn for use until use and treatment have been completed.

REGULATORY MECHANISMS

MS4 Permit Requirement:

Part I.E.3.a.ii Regulatory Mechanism: To the extent allowable under state or local law, implement a regulatory mechanism to meet the requirements in Part I.E.3.a., including the following:

- (A) The ability to implement sanctions against entities responsible for applicable construction activities.*
- (B) Require control measures to be implemented for all applicable construction activities from initial disturbance until final stabilization.*

The city of Thornton relies on several city codes; construction permit with an additional contract for capital improvement projects; and design standards; to comply with the MS4 permit requirements. In order for any construction activity to begin in the city, the developer/contractor must submit a construction permit application. The city code sections are as follows:

- Sec. 38-391. Abatement of Nuisance;
- Sec. 18-650. Adoption of Storm Drainage Master Plans and Drainage Criteria Manuals;
- Sec. 18-653. Stormwater Management Plan;
- Sec. 18-654. Compliance with State and Federal Storm Water Quality Control Measures;
- Sec. 22-112. Definitions;
- Sec. 22-115. Grading;
- Sec. 22-117. Hazards;
- Sec. 22-132. Permit Conditions;
- Sec. 22-156. Responsibilities of Permittee
- Sec. 22-191. Suspension or Revocation of Permit.

Regulatory Exemptions and Exclusions

MS4 Permit Requirement:

Part I.E.3.a.iii. Regulatory Mechanism Exemptions, Procedures must be implemented to ensure that any exemptions, waivers or variances included in the regulatory mechanism are applied in a manner that complies with the terms and conditions of this permit.

The only exclusion that the City of Thornton will accept is the Construction Activates with R-Factor Waiver exclusion. The developer/contractor who applies for this exclusion must submit to the city a copy of the completed R-Factor application and certified R-Factor waiver from CDPHE. These documents are saved in the city's corresponding project folder.

CONTROL MEASURE REQUIREMENTS

MS4 Permit Requirements:

Part I.E.3.a.iv. Control Measure Requirements: The permittee's Construction Sites Program must address selection, installation, implementation, and maintenance of control measures that meet the requirements of Part I.B. Control measures must prevent pollution or degradation of state waters. Control measures must also be appropriate for the specific construction activity, the applicable pollutant sources, and phase of construction. There are a wide variety of structural and non-structural control measures that can be used at applicable construction sites. Control measures must meet the minimum requirements below.

(A) Appropriate control measures must be implemented prior to the start of construction activity, must control potential pollutants during each phase of construction, and must be continued through final stabilization. Appropriate structural control measures must be maintained in operational condition.

(B) Control measures must be selected, designed, installed, implemented, and maintained to provide control of all potential pollutants, such as but not limited to sediment, construction site waste, trash, discarded building materials, concrete truck washout, chemicals, sanitary waste, and contaminated soils in discharges to the MS4.

Control measures must be selected appropriately for the specific construction activity and the applicable pollutant sources, and phase of construction. Control measures must be implemented prior to the start of any construction activity and must be maintained in operational condition through final stabilization.

At a minimum pollutant sources associated with the following activities must be addressed:

- 1) Land disturbance and storage of soils
- 2) Vehicle tracking
- 3) Loading and unloading operations
- 4) Outdoor storage of construction site materials, building materials, fertilizers, and chemicals
- 5) Bulk storage of materials
- 6) Vehicle and equipment maintenance and fueling
- 7) Significant dust or particulate generating processes
- 8) Routine maintenance activities involving fertilizers, pesticides, detergents, fuels, solvents, and oils

- 9) Concrete truck/equipment washing, including the concrete truck chute and associated fixtures and equipment
- 10) Dedicated asphalt and concrete batch plants.
- 11) Other areas or operations where spills can occur.
- 12) Other non-stormwater discharges including construction dewatering not covered under the Construction Dewatering Discharges general permit and wash water that may contribute pollutants to the MS4.

SITE PLAN REQUIREMENTS AND SITE PLAN REVIEW

MS4 Permit Requirements:

Part I.E.3.a.v.(B) Site Plan Requirement: The permittee must require operators to develop site plan(s) that locate (if applicable) and identify all structural and non-structural control measures for the applicable construction activities. The site plan(s) must contain installation and implementation specifications or a reference to the document with installation and implementation specifications for all structural control measures. A narrative description of non-structural control measures must be included in the site plan (s).

Construction operators are required to develop site plans to identify all control measures applicable to construction activities. Site plans for the purpose of this document will be Stormwater Management Plans (SWMPs) and Erosion and Sediment Control (ESC) Drawings. The plans are required to contain installation and implementation specifications as required by City Code Section 18-653 Storm Water Management Plan, 18-654 Compliance with State and Federal Storm Water Quality Control Measures, and the City Standards and Specification or other regulations.

Site Plan Review

MS4 Permit Requirements:

Part I.E.3.a.v.(C) Initial Site Plan Review: The permittee must implement site plan review for all applicable construction activities prior to the start of construction activities...Initial site plan review shall include the following:

- 1) *Confirmation that the site plan(s) includes appropriate control measures for all stages of construction, including final stabilization.*
- 2) *Confirmation that the control measures meet the requirements in Part I.E.3.a.iv.*

Site plan review is a major component of establishing compliance with the City of Thornton's MS4 permit confirmation requirements. This confirmation process is split between two departments, Infrastructure Engineering and Development Engineering. The Infrastructure Engineering Stormwater Quality Compliance Group performs reviews for Capital Improvement Projects (CIP) for construction while Development Engineering Project Managers do the same for development construction. Although both types of construction require the review of the ESC Drawings, SWMPs are only reviewed for CIP and not for development construction.

To help standardize the process the city has developed tools for both CIP and Development. These tools (Appendix A) are as follows:

- CIP
 - Sediment & Erosion Control Checklist
 - SWMP Review Form

- General Erosion and Sediment Control Notes
- Development
 - Sediment & Erosion Control Plan Checklist
 - General Erosion and Sediment Control Notes

All review forms, checklists and final reviewed site plans are to be saved in their respective project folders.

SITE INSPECTIONS

MS4 Permit Requirements:

Part I.E.3.c.vi. Site Inspection: A list of citation(s) and location(s) of applicable documents that demonstrate that the permittee has written procedures for conducting site inspections, including the citation(s) and location(s) of supporting documents that describe the following:

- (A) The process for determining, implementing, and documenting the inspection type, frequencies and exclusions.*
- (B) The process for inspection follow-up, including determining, implementing, and documenting the nature of the follow-up action.*
- (C) The process and tools used for documenting inspections.*

Prior to site disturbance, the city inspector will perform an initial inspection of the construction site to verify all control measures are in place and to document the existing vegetative cover. Future inspections will be conducted by city inspectors with or without advance notice throughout the duration of construction until final stabilization is achieved or upon receiving proof of termination of the CDPS Construction Activity Permit from the Operator if this permit is required. City inspectors typically make unannounced site visits; however, city inspectors as a courtesy may notify operators that they will be on-site. During the site visit, the city inspector may consider, inspect, and evaluate any or all of the following:

- Outfalls and discharge points for evidence of sediment migration, pollutants, or erosion.
- Site boundaries and perimeter controls for containment with some form of sediment barrier.
- Ponds, basins, traps, drainage ditches/swales, and other water quality features for correct construction, function, protection, integrity, and maintenance.
- Disturbed areas for correct phasing and dormant areas not currently being worked that require stabilization, temporary seeding or other means of cover.
- Areas with final stabilization for germination, adequate cover, and/or need for re-application or maintenance.
- Paved surfaces for evidence of dirt tracking, dirt ramps, need for cleaning, installation of vehicle track pads, and sediment barriers installed adjacent to disturbed sections.
- Inlets for correct and adequate protection, maintenance, or staining from pollution sources.
- Material storage and waste handling areas and practices to verify that appropriate measures are in place and exercised to manage all potential pollution sources. This may include waste receptacles, lay-down and staging areas, designated liquid waste washout areas, fuel storage, and waste piles.
- Appropriate controls for site drainage leaving the limits of the site (run-off) and management of adjacent site drainage entering the site (run-on).

- Other implemented or required procedural, non-structural or administrative control measures.
- Documentation of required self-inspections including maintenance logs and SWMP updates.
- Consistency between current, site-specific SWMP and installed/implemented controls and site conditions.
- Demolition activities, including saw cutting operations, for adequate waste management.

This list is not intended to be all-inclusive, but is intended to identify the general scope of City inspections for compliance with the City’s stormwater management requirements for construction activities. The city inspector may perform several types of inspections depending on the site conditions. The inspections are listed in Table 1 below:

Table 1

Type of Inspection	Frequency ¹		Description
	CIP	Dev.	
Frequency Exclusion			<p>Inspections required only when observations or reports of discharges of sediment from disturbed areas.</p> <p>Exclusions:</p> <p>Finished Home - Inspections are not required for a residential lot that has been conveyed to a homeowner when:</p> <ul style="list-style-type: none"> • The lot has been sold to the homeowner(s) for private residential use, the lot has less than one acre of disturbed area, the grading and the home is completely built and a certificate of occupancy has been issued to the homeowner. • It has been documented that the lot is subject to this exclusion. • The residential development site must still be inspected under the inspection frequencies described below. <p>Unfinished Home - Inspections are not required for a residential lot with an unfinished home when:</p> <ul style="list-style-type: none"> • The lot has less than one acre of disturbed area. • It has been documented that the lot is subject to this exclusion. • The residential development site must still be inspected under the inspection frequencies described below.
Routine	14	42	<p>Routine inspections are the most common inspection method used in the city. Routine inspections must access the entire site for the following:</p> <ul style="list-style-type: none"> • Control Measures: Identify and locate control measures that need routine maintenance, are inadequately installed or if additional control measures are needed. • Pollutant Sources: Investigate if there are any pollutant sources that have caused or have the potential to cause an illicit discharge

¹ The frequency of inspections are per calendar days, not business days.

			<ul style="list-style-type: none"> Discharge Points: Evaluate all discharge points to the MS4 on-site for evidence of an illicit discharge. Discharge point beyond the limits of construction will be evaluated when necessary. <p>Routine inspections are also used for initial and closeout inspections.</p>
Compliance	14	14	Compliance inspections are used when the previous inspection result was a Notice of Non-compliance, Notice of Violation or a Stop Work Order for the site. The city may use a routine inspection to meet the requirements for a compliance inspection. In addition to the regular routine inspection documentation, the inspection report will document if the corrective actions from the previous inspection have been completed. To identify the inspection as a compliance inspection the inspection type on the form will be called routine-compliance.
Operator Compliance Inspection	14	14	Operator Compliance inspections have the same requirements as regular compliance inspections the only difference is that the inspection is completed by the operator of the construction site instead of the city. The compliance inspection must be signed and dated with completion of all corrective actions. If the Operator does not submit a completed inspection report to the city within 14 days of the noncompliant routine inspection the city must complete a compliance inspection.
Full	~70 ²	NA	A full inspection combines a routine inspection with a comprehensive document review of all site plans. The full inspection provides compliance assistance for control measure maintenance and SWMP compliance.
Inactive Site	28	56	<p>Inactive Site inspections are for sites where construction activity is complete and is awaiting vegetative growth for final stabilization or for sites where no new construction activity has occurred since the last inspection.</p> <ul style="list-style-type: none"> Control Measures: Identify and locate control measures that need routine maintenance, are inadequately installed or if additional control measures are needed Discharge Points: Evaluate all discharge points to the MS4 on-site for evidence of an illicit discharge. Discharge point beyond the limits of construction will be evaluated when necessary.
Staff Vacancy	60	60	Staff Vacancy Inspections have the same requirements as routine inspections but have a decreased frequency to accommodate a staff vacancy or temporary leave due to vacation or illness.

City inspections and subsequent reports are not intended to exhaustively identify every violation or deficiency, which may exist on a site. Similarly, photo logs, which may accompany inspection reports are not intended to document every issue, every instance of every issue of concern, or every violation identified or existing on a site. City inspection reports do not fulfill the requirement for

² A Full compliance inspection will be conducted after the second Notice of Violation is issued.

self-inspections required by the Operator. The Operator shall be responsible for any additional or unforeseen conditions not addressed by the original SWMP.

The City uses UtiliSync database for completing inspection reports and recordkeeping for stormwater projects. The program has specific report forms for all inspections. Blank versions of these report forms can found in Appendix B: Inspection Reports

COMPLIANCE AND ENFORCEMENT

MS4 Permit Requirements:

Part I.E.3.a.vii. Enforcement Response: Implement appropriate enforcement procedures and actions to meet the requirements of Part I.E.3.

- (A) The permittee must have processes and sanctions to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measure requirements.*
- (B) The permittee must escalate enforcement as necessary based on the severity of violation and/or the recalcitrance of the violator to ensure that findings of a similar nature are enforced upon consistently. Enforcement procedures must include informal, formal, and judicial enforcement responses.*

Part I.E.3.c.vii Enforcement Response: A list of citation(s) and location(s) of applicable documents that demonstrate that the permittee has written procedures for enforcement response. The document(s) must detail the types of escalating enforcement responses the permittee will take in response to common violations and time periods within which responses will take place, including as a minimum:

- (A) Construction commencing without site plan review in accordance with I.E.3.a.v.*
- (B) Control measures not maintained in operational condition at time of permittee inspection, including sites that have temporarily shut down construction activities.*
- (C) Uncorrected finding(s) from previous inspections.*
- (D) Failure to implement a control measure for a pollutant source or inadequate control measure resulting in a discharge of pollutants from the applicable construction site or to the MS4.*

Site Compliance

The construction site should be routinely checked by the site Operator for proper control measure installation and continuing function in accordance with the approved SWMP narrative and site plans. Any control measures with loss of integrity, loss of function, or breaches identified shall be repaired or replaced immediately to reduce the potential for stormwater to transport sediment and other pollutants off-site and into the MS4. Similarly, in areas where off-site stormwater may flow onto and through the project site, perimeter control measures should be implemented to route off-site stormwater around the site rather than through the site.

Good housekeeping practices such as proper waste handling, material storage, waste disposal, street sweeping, and effective vehicle tracking control measures also reduce the potential for stormwater pollution.

Inspections Resulting in Non-Compliance

Site conditions that constitute non-compliance include, but are not limited to:

- CMs that are not installed according to the approved SWMP and drawings.
- CMs not installed correctly, or not implemented correctly.
- Neglected CMs, or in need of significant maintenance or replacement.

- Portable toilets that are improperly stationed on paved surfaces, at curb flow lines, and/or are not anchored properly.
- Evidence of liquid waste or washouts that are discharged directly onto the ground without containment.
- Evidence of an illicit discharge into the MS4.
- Concrete washout area that is near failure, not installed or not signed properly.
- Fuel leaks/spills that have not been properly remediated.
- Inadequate vehicle tracking control measures to prevent sediment tracking onto paved sections.
- Significant vehicle tracking onto City streets, roads or paved areas.
- Repeated neglect and/or findings from previous reports that have not been adequately addressed.

Enforcement Escalation

Inspection Escalation Process

Inspection Reporting:

1. A copy of the Stormwater Construction Site Inspection Report shall be provided to the Operator's Qualified Manager(s):
2. The report identifies one of the following four situations:
 - a. Passing inspection: only minor deficiencies need to be addressed or no action is required. The City Inspector may notify the Operator with a copy of the inspection report. The Operator must correct any deficiencies immediately.
 - b. Notice of non-compliance (NONC): For Active CIP projects (14 day frequency), Notice of Non-Compliance is issued for three or more CMs that are identified as inadequate or if there is a need for additional CMs. For Development and Inactive CIP projects (28 day frequency), a Notice of Non-Compliance is issued for any CM identified as inadequate or if there is an addition need for CMs. A Notice of non-compliance is issued to the Operator in written form. The written communication is a copy of the inspection report provided by the City Inspector. The Operator must correct the deficiencies immediately.
 - c. Notice of Violation (NOV) (Appendix C): Indicates a site with site-wide or systematic CM issues and/or repeated non-compliance items which have not been resolved. Site-wide or systemic violations include (but are not limited to) illicit discharges, and CM condition with an imminent potential for failure.
 - (1) Violations requiring maintenance may include observations noted where it has been determined that the condition of the CM is such that there is significant potential for pollutants to be conveyed to the MS4. It is possible that several observations of the same violation could escalate the finding into a significant violation. If the City Inspector notes a violation requiring maintenance after three inspections, this may be noted as a significant violation. The written communication will be issued to the Operator by the City Inspector.
 - (2) For the resolution of an NOV, all non-compliant areas of concern and violations must be adequately addressed immediately. If certain deficiencies require more time to correct, an action plan must be submitted to the City that includes a timeline for remediation. In either case, communication of an action plan should be sent to the City immediately. NOVs remain open and unresolved until an on-site inspection

is conducted by a City Inspector to verify that all of the issues and concerns have been addressed, the site is free of violations, and Operator receives written notification from the City that the NOV has been resolved and closed.

- (3) It is possible that the observed violations may escalate to a level where the City may issue a Stop Work Order.
3. Stop Work Order (SWO) (Appendix D): A SWO is a written notification given to the Operator to cease all on-site construction activities for Flagrant Violations or repeated unresolved NOVs. SWOs require the Operator to immediately stop all construction activities, but continue to remediate all violations. SWOs remain in force until an on-site inspection is conducted by a City Inspector to verify that all issues and concerns have been properly addressed, and the site is violation free. The SWO is removed by the City when the Operator receives written notification from the City that the SWO has been lifted.

Flow charts of the city's inspection and enforcement process can be found in Appendix E. Flow charts for CIP and Development are similar in regards to SWMP review. Development is not required to review the SWMP.

TRAINING

MS4 Permit Requirements:

Part I.E.3.a.viii Training: The permittee must provide information to operators of applicable construction activities as necessary to ensure that each operator is aware of the permittee's applicable requirements, including controlling pollutants such as trash. The training must also include information on trash as pollutant source.

Part I.E.3.b.viii Training: The applicable mechanism or program documents used to train construction operators.

Operators are encouraged to visit the city water quality webpage for training opportunities. The city preconstruction meeting is also used to provide stormwater requirements. The initial inspection and forthcoming inspections are also used to provide compliance assistance and education on the use of appropriate CM installation and application.

Training will be provided to city staff on an as needed basis to ensure all city staff involved with the stormwater compliance construction program are properly trained. The training materials include this document, the inspection report form and any additional materials. All trainings are documented with the training log (Appendix F) and are saved in the Construction Program Training log folder.

OVERLAPPING AGREEMENTS

MS4 Permit Requirements:

Part I.E.3.a.ix Overlapping Agreement: For Applicable Construction Activities that Overlap Multiple Permit Areas, when a written agreement is in place with a co-regulating MS4 permittee:

- (A) Control measure requirements may be imposed on the operator in accordance with the requirements of a co-regulating MS4 permittee pursuant to the written agreement.*
- (B) Site plan review/acceptance and site inspection actions may be conducted by a co-regulating MS4 permittee to meet the requirement of the permit.*

Part I.E.3.b.ix Overlapping Agreement: For Applicable Construction Activities that Overlap Multiple Permit Areas: Copies of any written agreements between co-regulating MS4 permittees when required.

Part i.E.3.c.ix Overlapping Agreement: For Applicable Construction Activities that Overlap Multiple Permit Areas: A list of citation(s) and location(s) of applicable documents that demonstrate that the permittee meets all permit requirements in Part I.E.3 for construction activities for which the permittee is the owner or operator, if different than procedures for private sites.

The city has an overlapping agreement form (Appendix G) that is used in situations where CIP construction activities cross over into another MS4 permit area. Generally the city is the one that will conduct the inspections for the overlapping area and submit copies the reports to the head of the Stormwater Program of the adjoining MS4.

APPENDIX A: SWMP REVIEW FORMS AND ESC CHECKLIST

APPENDIX B: INSPECTION REPORTS

APPENDIX C: NOTICE OF VIOLATION TEMPLATE

APPENDIX D: STOP WORK ORDER

APPENDIX E: INSPECTION/ENFORCEMENT PROCESS

APPENDIX F: TRAINING LOG

APPENDIX G: OVERLAPPING AGREEMENT
