Stormwater Phase II

Developing an Effective Municipal Stormwater Management Program for Construction Sites

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Erik Nelson, Douglas County, Colorado
Topics for Today’s Webcast

• Overview of federal requirements
  – Construction minimum measure
  – Qualifying Local Programs
• Common elements of an effective municipal construction stormwater program
• Setting up a program to review construction site plans
• Developing an inspection program
• Summary of key points
• Case Study, “Douglas County, Colorado Construction Stormwater Program”
1) How many people are participating in the webcast today at your location?

A) Just me
B) 2 to 5
C) 6 to 10
D) More than 10
2) What is the population served by your MS4?

A) Less than 15,000
B) 15,000 to 25,000
C) 26,000 to 50,000
D) 51,000 to 100,000
E) 101,000 to 200,000
F) More than 200,000
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  - Construction minimum measure
  - Qualifying Local Programs
- Common elements of an effective municipal construction stormwater program
- Setting up a program to review construction site plans
- Developing an inspection program
- Summary of Key Points
Why do we have to do this?

- Sediment is one of the leading water resource pollutants nationwide
- Sediment loads from a construction site can be 80 to 100 times higher than from forested lands
- Other construction site wastes (cement, paint, fuel, oil, etc.) are also problems
- It’s the law . . . .
Phase II Minimum Control Measure:

*Construction Site Stormwater Runoff Control*

Regulated Municipalities must:

- Develop a program to reduce pollutants in stormwater from construction activities that disturb > 1 acre*
- Have an ordinance, or other regulatory means, with penalties, that requires appropriate E&S controls and controls for other construction site wastes
- Review site plans and consider potential impacts on water quality
- Inspect sites and enforce
- Receive and consider input from the public

* Includes smaller sites that are part of a larger, common plan of development
What construction must be covered by these municipal programs?

- Stormwater discharges from sites that disturb 1 acre or more of land, including those within a “common plan of development,”
  - e.g. a half-acre lot in a 5 acre subdivision
- Site “operator” is commonly defined as:
  - Person with control over plans and specifications
  - Person with day-to-day control of site activities
  - Usually the owner, developer, or contractor
Phase II Minimum Control Measure:

*Construction Site Stormwater Runoff Control*

**RECOMMEND:**

- Procedures for site plan review should include review of individual pre-construction site plans
  - BMPs, water resource impacts can be addressed early

- Procedures for site inspections and enforcement can include steps to identify priority sites, based on the nature of the site, topography, soil characteristics, and receiving water quality

- Provide appropriate education and training for construction site operators
  - Reduces problems, improves compliance, establishes standard expectations (“predictability”) regarding inspections, enforcement, etc.
Qualifying Local Programs

The Qualifying Local Programs concept was added to the Phase II regulations to:
- Recognize strong existing local sediment and erosion control programs
- Provide the opportunity to recognize other communities as they develop local sediment and erosion control programs in the future
- Provide opportunities to streamline the regulatory process for construction site operators
Qualifying Local Programs

• The Qualifying Local Programs concept provides a kind of “one-stop shopping” for construction site operators.

• Operators can simply follow local requirements in QLP communities because these requirements have been deemed equivalent to the state NPDES requirements.
Qualifying Local Programs

- How Does it Work?
  - The NPDES permitting authority (usually a state agency), reviews existing local sediment and erosion control programs.
  - If a local program meets the requirements outlined in 40 CFR 122.44(s), the permitting authority recognizes that program in its Construction General Permit.
  - Construction sites that are operating within that jurisdiction’s boundaries follow the local requirements.
  - The state permitting authority may also waive the NOI (or application) requirement for small construction sites (1-5 acres), further streamlining the process.
Qualifying Local Programs

- Approximately 10 states already utilize this provision and have tailored it to their own situations
- New memo from EPA HQ encourages further use of the Qualifying Local Programs concept
- State NPDES permitting authorities and Phase I and II communities are encouraged to work together to make further use of this provision
3) How many full-time equivalent staff does your entire stormwater program have?

A) 1-2
B) 3-5
C) 6-10
D) More than 10
Questions?
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  – Qualifying Local Programs

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What are the common elements of an effective program?

- Local ordinance specifying BMP requirements & etc.
- Inventory of construction sites with relevant info
- Prioritization of construction sites (e.g., by impacts, etc.)
- Education and training
- Plan review and approval process and procedure
- Inspections and enforcement mechanisms
Ordinance elements

- Grading/clearing ordinance specifying regulatory threshold (i.e., sq ft of disturbance)
- Ordinance addresses “other wastes” at sites, e.g., paint, cement, fuel, etc.
- Ordinance requires implementation of appropriate sediment and erosion control BMPs
- Ordinance includes sanctions or penalties for non-compliance
Other considerations

• Is the ordinance and state NPDES permit reasonably consistent?
• Does the ordinance describe the site plan review and approval process?
• Does the ordinance reference clear guidance on BMP design, installation, operation, and maintenance?
• Is the inspection and enforcement approach clear?
Inventory and prioritization of construction sites

- Develop a system to track construction sites
  - Should include plan review, inspection, and enforcement information on each site
- Consider prioritizing sites for inspection
  - Based on risk to water resources, operator history, etc.
- Consider developing procedures for receiving & and considering information submitted by the public
Education and training

• What type of training will MS4 staff receive?
  – Are controls reviewed?
  – Plan review & admin staff
  – Construction site inspectors

• What type of training will construction operators receive?
  – Is it required?
  – Engineers, developers, contractors, plan preparers
  – Construction site managers
  – Construction workers
Questions?
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Plan review and approval

- Develop system to review plans - earlier is better!
- Develop criteria and/or a checklist for plan review
- Guidance on what needs to be included in the plans
- Cite standard conditions
- Verify NPDES construction permit coverage
- Coordinate plan review activities with post-construction plan review
General considerations

- Can you describe the steps in your plan review and approval process?
- Does your program address public and private construction projects?
- What standard conditions are attached to plans?
- Are there ways to streamline plan review/approval and permitting?
Recordkeeping

• Is the plan review and approval process documented?
• Is there a database to track active construction sites, inspections, and enforcement?
• Are there procedures and documentation for inspections and enforcement?
Example Plan Review Checklist

• Vermont Erosion Prevention and Sediment Control Plan Checklist

• http://www.cicacenter.org/pdf/vtepsc.pdf

4. Erosion Prevention and Sediment Control Plan
(scale 1" = 100' or larger)

☐ limits of soil disturbance
☐ riparian conservation buffer limits and method to be used for demarcation
☐ location of all structural erosion and sediment control measures and details
☐ location of areas to be seeded and mulched
☐ stormwater pathways
☐ erosion control matting on slopes greater than 3:1
☐ no hay bales or silt fence running across contours or in areas of concentrated flow
4) What are the two (2) greatest needs of your construction site stormwater program? (Pick 2)

A) Training for staff
B) Improvements in our ordinance
C) More support from local government
D) Staffing
E) Administrative support
F) Support for non-staff expenses
Questions?
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Inspections and Enforcement

• Identify who will conduct the inspections
• Identify which sites will be inspected (prioritization)
• Decide when they will be inspected (regularly, priority-based, after rains)
• Develop procedures for inspecting sites (steps, checklist, reporting)
• Identify procedures for enforcement (warning, re-inspection, citation, etc.)
Inspection program basics

• Prioritizing/targeting sites for inspection (desktop)
• Meet & greet
• File review
  – NOI and/or permit
  – SW Pollution Prevention Plan
  – Signed inspection reports
• Walking inspection
  – Perimeter controls
  – Disturbed areas
  – Drainage system controls
  – Good housekeeping measures
• Closing interview and report write-up
Inspecting erosion & sediment controls

• Documentation is key!
  - Field notebook with notes
  - Inspection checklist
  - Samples/chain of custody
  - Photos/photo log
  - Copies of documents
  - Drawings & diagrams

• Reports include site info, permit number, date, inspector name, site manager name, downstream receiving water, photo locations, people interviewed, other important information
Use checklists for efficiency, standardization.
CONSTRUCTION SITE INSPECTION CHECKLIST

Inspected By: 

Project: 

Contractor: 

Date: 

Check “Yes” or “No” or “N/A” if not applicable.

YES NO N/A

1. Has there been rain at the site since the last inspection?

2. Are all sediment barriers (e.g., sandbags, straw bales, and silt fences) in place in accordance with the Plan and are they functioning properly?

3. If present, are all exposed slopes protected from erosion through the implementation of acceptable soil stabilization practices?

4. If present, are all sediment traps/basins installed and functioning properly?

5. Are all material handling and storage areas reasonably clean and free of spills, leaks, or other deleterious materials?

6. Are all equipment storage and maintenance areas reasonably clean and free of spills, leaks, or any other deleterious materials?

7. Are all materials and equipment properly covered?

8. Are all external discharge points (i.e., outfalls) reasonably free of any noticeable pollutant discharges?

9. Are all internal discharge points (i.e., storm drain inlets) provided with inlet protection?
Appendix C
Developer/Contractor Self-Inspection Form

INSPECTION LOG

The site shall be inspected before and after storm events with 0.25 inches or greater predicted or actual precipitation, and documented on the Construction Site Inspection Checklist Form. Incidents of noncompliance must be reported to the Engineer. A log of all inspections, as shown below, shall be kept current.

<table>
<thead>
<tr>
<th>Date</th>
<th>Inspector</th>
<th>Type of Inspection</th>
<th>Observations</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>Routine</td>
<td>Pre-Storm</td>
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Common problems municipal inspectors find at sites

• No temporary or permanent cover
  - Required for areas idle for 14 days
• No sediment controls
  - Silt fences, sediment traps
• No controls on soil stockpiles
  - Mulch, seed, or silt fence
• No inlet protection
  - Drop & curb inlets
• Mud tracked onto paved roads
  - Poor (or no) vehicle exit
• Improper waste management
  - Concrete & other wash water, spills, fuel, etc.
What works for municipal programs?

- Using dedicated E&S control inspectors
- Pre- and post-storm event inspections
- Variety of enforcement mechanisms
  - Partial stop work orders
  - Delaying Building Dept. inspections and approvals if stormwater violations are not fixed
- Providing training to workers with site responsibilities
- Training plan review staff and inspectors
- MS4 programs that are consistent with state NPDES requirements
What doesn’t work?

- Unnecessary inconsistencies between the ordinance and state permit
- Lack of clear BMP guidance
- Inspectors who are not trained on the state/local construction permit requirements
- Site plans that don’t reflect reality in the field
- Inspections without enforcement
5) What percentage of active construction sites in your jurisdiction does your program inspect quarterly?

A) Less than 10 percent.
B) About 10 to 25 percent.
C) About 25 to 50 percent.
D) About 50 to 75 percent.
E) More than 75 percent.
6) What two (2) types of problems or violations are the most common in your jurisdiction? (Pick 2)

A) Site operator does not have permit coverage.
B) BMPs listed on plan documents are not installed.
C) BMPs are installed, but not maintained.
D) Bare areas at final grade are not seeded or mulched within prescribed timeframe (14-21 days).
E) Site personnel do not understand the basic principles of BMPs
F) There is no Stormwater Pollution Prevention Plan
Citizen Inspection Programs

Volunteer monitoring program for construction sites

Sponsored by Upper Chattahoochee Riverkeeper Program

Atlanta, Georgia

http://www.getthedirtout.org/
Dikes, berms, and filters should pond/settle or filter soil from runoff. Look for bypasses, torn filters, or poor ponding (rapid flow-through).

Excellent berm of rock bags protecting drop inlet. Note that bags are only half full of rock, allowing tight fit. Good overlap; no large openings visible.

Fair protection of curbside drop inlet. Educate equipment operators on avoiding berms. Use in-drain filters if berms create hazards for road open to public.

Poor inlet protection - no controls visible. Note straw and debris clogging inlet grating. Rock berms, rock bags, inlet filters, or other products could be used here.

Removes soil through ponding and settling during 24-48 hr drain-down period after rain. Should not allow rapid flow-through of muddy water. Outlets often modified with rock berm or other flow restrictor during construction.

Good construction and operation. Note long basin design, seeded sidewalls, and flow restrictor (half-pipe and rock berm) in front of inlet hole.

Fair sediment basin construction, but should be seeded. Outlet riser has rock berm flow restrictor, but no trash rock.

Good length and outlet, but very poor operation and maintenance. Side banks not seeded, no flow restrictor at V-notched inlet. Needs to be cleaned out.
Site Report Card

Monitoring personnel review and evaluate BMPs on each site

Results reported to contractor and/or regulatory agency
Also effective: courtesy inspections

- Sponsored by non-governmental organizations
- Provides non-regulatory comprehensive inspection
- Inspector can offer technical assistance on BMPs
- Can be coupled with training referrals & certification programs
- Helps contractors understand inspection process
Questions?
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Documentation is vital!

• If it’s not written down, it didn’t happen . . .
• Keep records of all program activities
• Organize records by activity type
  – Ordinance/regulatory
  – Plan reviews
  – Inspections
  – Training
  – Enforcement
• Be ready!
Key program development questions

• Legal authority:
  – Grading permit need to be modified?
  – Do you have authority to require BMPs?

• Construction site inventory:
  – How are construction projects tracked?
  – How often is inventory updated?
  – Does inventory track inspection and enforcement information?
  – Do you prioritize sites for inspection?

• BMP requirements:
  – Do you have clear technical guidance?
  – Are there minimum BMP requirements?
  – Do developers/contractors understand your requirements?
Key program questions (cont.)

• Plan review and approval:
  - What standard conditions are attached to plans?
  - Does the review process follow a standard procedure (review criteria or a checklist)?
  - Does the MS4 require NOIs before projects are approved?

• Site inspections:
  - How many inspections are conducted? Frequency?
  - What type of inspector is used (building, grading, dedicated ESC inspector)?
  - How are inspection results documented?
  - Inspectors knowledgeable about stormwater, BMPs, regulations?
  - Inspectors familiar with State’s Construction General Permit?
  - Inspectors check construction plans during inspections?
  - Inspectors use a checklist during site visits?
  - Do inspectors walk entire site?

• Enforcement:
  - What types of enforcement actions are available?
  - Are actions progressive, increasing in severity?
What are some measurable goals?

- Number of construction sites inspected
- Enforcement actions taken
- Number of construction operators attending training sessions
- Number of construction inspectors trained
- Number of construction plans reviewed/approved
- Revision of ordinance(s)
US EPA Resources on the Web: http://www.epa.gov/npdes/stormwater

Does Your Construction Site Need a Stormwater Permit?
A Construction Site Operator’s Guide to EPA’s Stormwater Permit Program

Stormwater and the Construction Industry

Protect Natural Features
- Maintain Natural Features
- Minimize construction impacts
- Encourage drainage away from steep slopes

Construction Phasing
- Proper stormwater controls in place
- Adequate drainage to prevent excessive runoff

Vegetative Buffers
- Vernal pools in disturbance area
- Vegetation in disturbed areas
- Minimize impact on natural vegetation

Site Stabilization
- Silt fences in place
- Proper rate of erosion control
- Minimize surface and subsurface runoff

Maintain your BMPs!
www.epa.gov/npdes/managingbmps

Storm Drain Inlet Protection
- Properly protected inlet
- No silt or debris
- burgers mound to prevent infiltration

Construction Entrances
- Properly protected
- No silt or debris
- burgers mound to prevent infiltration

Slopes
- Properly protected
- No silt or debris
- burgers mound to prevent infiltration

Dirt Stockpiles
- Properly protected
- No silt or debris
- burgers mound to prevent infiltration

Table 1: Pollutants Commonly Discharged from Construction Sites

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sediment</td>
<td>Includes soil, silt, and clay.</td>
</tr>
<tr>
<td>Solid and sanitary wastes</td>
<td>Includes waste from sewers, septic tanks, and other disposal systems.</td>
</tr>
<tr>
<td>Phosphorus (phosphates)</td>
<td>Includes chemicals used in detergents and other products.</td>
</tr>
<tr>
<td>Nitrogen (detergents)</td>
<td>Includes chemicals used in detergents and other products.</td>
</tr>
<tr>
<td>Petroleum</td>
<td>Includes oil, grease, and other chemicals used in construction and maintenance.</td>
</tr>
<tr>
<td>Oil and grease</td>
<td>Includes oil, grease, and other chemicals used in construction and maintenance.</td>
</tr>
<tr>
<td>Concrete and asphalt</td>
<td>Contains a variety of materials used in construction and maintenance.</td>
</tr>
</tbody>
</table>
7) Would you say that, overall, compliance with the construction site stormwater permitting requirements in your jurisdiction is:

A) Excellent
B) Very good
C) Fair to good
D) Somewhat poor
E) Very poor
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Grading, Erosion, and Sediment Control (GESC) Program
Douglas County

- 844 Square Miles of Mountains, Foothills and Plains
- 238,000 Residents of Which 73% Live in the Unincorporated Portions of the County
- 191% Increase in Population from 1990-2000
3 Important Parts to Douglas County’s Grading, Erosion and Sediment Control (GESC) Program

GESC Plan Development and Review Process
Inspection Program
Enforcement Procedures
GESC Plan Development and Review Process

- Basis for all Grading, Erosion and Sediment Control Criteria and Guidance
Unique Features of the GESC Manual and Program
Section 2. Getting Started

Permit Step 1: Confirm that a Temporary Batch Plant or Standard GESC Permit is Required.
Section 2.1 provides background information related to Step 1.

Projects that Require a Temporary Batch Plant or Standard GESC Permit

If a Low Impact GESC Permit is required, see Section 7 for applicable Permit Steps and information.

Who Prepares GESC Plans?

Important!

2.1 The first step in the process is to examine the information in Section 1.4 and 1.5 to confirm that a Temporary Batch Plant or Standard GESC Permit is required for the project. These GESC Permits apply to most land disturbing activities in the County other than small (less than 1 acre) projects with negligible negative impact (requiring a Low Impact GESC Permit) and most agricultural or emergency activities (exempt activities).

The Douglas County Engineering Division can be contacted to clarify GESC Permit requirements and to help interpret which GESC Permit, if any, applies to a particular project. Contact information is provided in Appendix A.

If a GESC Permit is not required, the process described herein is not applicable; however, BMPs shall still be required in accordance with the information shown in Sections 3 and 5.

Permit Step 2: Professional Engineer to Prepare a GESC Plan.
Section 2.2 discusses the professional engineer’s role in preparing a GESC Plan.

2.2 Laying out erosion and sediment control measures is often complex and involves engineering design issues such as embankment design, highway sizing (for sediment basins), pipe strength calculations (for stream crossings), and peak discharge estimates and hydraulic computations (for determination of flood elevations and velocities and sizing conveyance facilities).

Because of these issues, Colorado State Statutes require that GESC Plans be prepared by or under the responsible charge of, and signed and stamped by, a Professional Engineer registered in the State of Colorado (see Colorado State Engineering Law 12-26-101, General Provisions). For the purpose of this manual the Professional Engineer is referred to as the Design Engineer. Non-PES with experience in erosion and sediment control may assist in the development of a GESC Plan, but they must conduct their work under the supervision of the Design Engineer.

It is the responsibility of the Design Engineer to use professional judgment in the development of the GESC plans. If the Design Engineer determines that any GESC requirements, as applied to their specific project, pose a safety hazard, it is the Design Engineer to determine if a GESC Plan is necessary.

Important!

GESC Plans are to be prepared under the responsible charge of a Professional Engineer.
Color Photographs to Clearly Show Proper and Improper Installation and Maintenance of BMPs

Stop Work Signs to Clearly Indicate what Actions will get you a Stop Work Order

“DO” and “DON’T” Circles Assist with Distinguishing Good and Poor Practices
GESC Plan Standard Notes and Details

- A Set of the Standard GESC Notes and Details for the 25 Douglas County-Approved BMPs
- Must be Attached to all GESC Plans
- Designed to Save Time and Money in Development of GESC Plans and to Assist with Proper Installation and Maintenance of BMPs
- Only Available in Adobe Format
GESC Drawing and Report Checklist

- Provides a List of Required Information,
- Provides a Systematic Method of GESC Plan Development to Ensure Accurate Plan Sets
- Probably the Most Useful Tool Found in the GESC Manual
Presubmittal Meeting

• Prior to the Development of GESC Plans
• It is Recommended that the Owner and Engineer Attend
• Discuss Requirements of GESC Plan to Help Expedite Approval of GESC Plans
Completeness Check

• Every Friday Staff Reviews GESC Plans For “Completeness”
• Plans Submitted Before Friday will be Checked that week; Plans Submitted on Friday Will Not Be Checked Until the Following Friday
• GESC Plans Determined to be “Incomplete” by Review Staff Will Be Returned to Applicant without Comment
• This Process will be Repeated Until a Complete GESC Plan is Submitted
Fiscal Security

• Shall Be Posted Prior to Scheduling Preconstruction Meeting
• Shall be Letter of Credit or Cash Deposit
• Shall be Posted for a Minimum of 2-years*
• Held in Non-interest Bearing Account Until Revegetation Process is Complete and Accepted By County
• When Required, Security Shall Be Renewed at Least 14-Days Prior to Expiration Date or Security Shall Be Drawn Upon
GESC Inspection Program
County GESC Inspections

- Douglas County GESC Inspectors will Make Regular Inspections of Sites
- County Inspections are for Compliance Enforcement, *Not* Compliance Assistance
- Douglas County Tracks County Inspections
Mandatory County Inspections

• Mandatory Inspections that Shall be Scheduled by the GESC Manager:
  - Preconstruction Meeting
  - Topsoil Inspection
  - Anytime During Construction when GESC Managers Changes
  - Prior to Issuance of Right-of-Way Use and Construction Permits
  - Initial Close-out Inspection Prior to CO, TCO or Initial Acceptance
  - 2-years after Initial Acceptance/When Vegetation Has Met Required Coverage, Prior to Removal of BMPs
  - Final Close-out Inspection
The GESC Manager

- Designated by Owner and Contractor
- Contact Person for County regarding all GESC Matters
- Must be On-Site Majority of the Time and Available Via Phone 24-Hours a day
- Shall Have the Authority to Act on Behalf of Owner and Contractor
- Shall respond to Requests by Douglas County
- Owner and Contractor Still Legally Responsible
- Must inform DC within 7-Days if GESC Manager Changes
The Preconstruction Meeting

• Owner, Contractor, GESC Manager, Alternate GESC Manager, Subcontractors Must Attend
• Failure Will Result in Rescheduling and Reinspection Fee
• Highly Advisable that the Design Engineer Attend!
• Meeting Agenda – Meet and Greet, Contact Information, Review of Field Manual, Review of GESC Drawings, Inspection of BMPs and Acceptance or Denial of BMPs, and Q&A
GESC Field Manual

- “Smaller” Version of the GESC Manual
- Given to Permittees when they Schedule Preconstruction Meeting
- Reviewed with Permittees by GESC Inspector at Preconstruction Meeting
- Kept On-Site for Future Reference
Phased Grading Operations

• Requires all Grading Operations to be Conducted in 40-Acre Phases
• Allows Contractors 5-Days to Finish Stabilization of Previous Phases While Working on the Next Phase
• Allows for 70-Acres of Disturbance for Soil Mitigation
• We have Approved Variances for “Special” Sites Such as Golf Courses
Enforcement Procedures
Level III Violations - are viewed by Douglas County to Pose a Low but Immediate Risk to the Health, Safety, or Welfare of People and or the Environment; However, if not Corrected Quickly will Pose a More Serious Risk. Level III Violations Shall be Corrected with 48-Hours of Inspection Unless Otherwise Specified in Writing by the GESC Inspector.
Level II Violations - are Viewed by Douglas County to Pose a Moderate but Immediate Risk to the Health, Safety, or Welfare of People and or the Environment; However, if Not Immediately Corrected will Pose a Serious Risk. Level II Violations Shall be Corrected as Soon as the Owner/Contractor is Notified of the Violation(s).
Level I Violations - are Viewed by Douglas County to Pose an Immediate and Serious Risk to the Health, Safety, or Welfare of People and/or the Environment. Level I Violations Result in an Immediate Issuance of a Stop Work Order and Revocation of GESC Permit.
Stop Work Orders

- Issued to Sites With Level I Violations
- Stops ALL Work On Site
- Safety Related Items can be Completed With GESC Inspector’s OK
- Revokes GESC Permit
- Fee for Working Without GESC Permit
Re-Inspection Fees

- Charged to Sites that are Not in Compliance with GESC Requirements
- Must Be Paid at DC
- No Additional Inspections until Fee is Paid
- Designed to Offset the Increased Cost of Multiple Inspections for Non-Compliant Sites
GESC Manual Availability

- www.douglas.co.us
- CD’s
- Hard Copies
Questions or Comments?

Erik Nelson
Stormwater Management Engineer
Douglas County Engineering Division
100 3rd Street
Castle Rock, Colorado 80104
(303) 660-7490
8) Does your program use (choose any/all that may apply):

A) Notice of Violation letters?
B) “Tickets” or small fines?
C) Larger fines, based on severity of the problem?
D) Stop work orders?
Questions?