

April 2014

# The Monthly Dirt

A Monthly Newsletter on the California Construction General Permit

By WGR Southwest, Inc.

## What's the Plan?

SWPPP, WPCP, ESCP, CASQA, Caltrans ... all of those acronyms can be confusing to someone who is just looking for a storm water plan. What's the difference between a SWPPP and WPCP? What plan does my project need? In this edition of *The Monthly Dirt*, we are going to try to de-mystify some of the confusion that exists about these plans and when they are used.

**SWPPP – Storm Water Pollution Prevention Plan:** Although it has become common place to generically refer to all storm water plans as a SWPPP, there is a technical difference between these types of plans. In the context of the California Construction General Permit (CGP) and the municipal NPDES permits, a SWPPP is the document required for construction projects having soil disturbance greater than one acre or that are part of a larger common plan. In other words, the project requires coverage by the CGP; and the permit requires that a SWPPP be prepared. The CGP does not specify that a certain template be used for the preparation of the plan, but it does provide specific information about what is required to be contained in the document. In California, two dominant SWPPP templates are prevalent. The first is the *California Stormwater Quality Association (CASQA)* template for traditional Risk 1, 2, and 3 projects. CASQA has greatly simplified the SWPPP writing process with the creation of this template. It has easy to understand instructions and guidelines to help the preparer customize the template for a specific project and risk level. In our estimation, it has become the standard for SWPPPs in California and can be downloaded from [www.CASQA.org](http://www.CASQA.org) (an annual subscription is required to access the CASQA construction portal). One drawback is that CASQA does not offer a template for linear utility projects (LUPs); however, this is easily overcome by modifying a Risk 1 SWPPP with the requirements from Attachment A of the CGP. The second most common SWPPP in California is the Caltrans template. All Caltrans projects and some of the Caltrans oversight projects are required by contract to utilize their template. This template can be downloaded for free from [www.dot.ca.gov/hq/construc/stormwater/](http://www.dot.ca.gov/hq/construc/stormwater/). The Caltrans template consists of an innovative (although sometimes frustrating) Microsoft Access data population tool which interfaces with an Adobe Acrobat file to input data. Once the process is mastered it is a time saver. However, be warned! Take some time to familiarize yourself with it before tackling a project with a quick deadline. The template will accommodate for all risk levels but does not handle LUP projects (but, Caltrans typically does not have LUPs). Draw backs of the Caltrans templates is that it is not overly flexible and formatting can be a challenge. One tip that we have found is to do some post-production clean-up of the SWPPP once it has been saved into a pdf. If you use Adobe Acrobat Standard XI, you can edit text and do some clean-up of formatting problems.

**WPCP – Water Pollution Control Plan:** WPCPs are typically for projects not requiring coverage by the CGP. So why would someone want to prepare a plan if the permit does not require it? Typically, these plans are required from project proponents or contractors by municipalities and Caltrans in compliance with their municipal NPDES permit. This is especially true of Caltrans, WPCPs are very common on State highway projects. A Caltrans WPCP template can be downloaded at the same website as the SWPPP and works in much the same way. However, we advise against trying to customize the Caltrans WPCP for a non-Caltrans project. It is not easily done and you will be frustrated. We have found it easier to take the CASQA SWPPP template and convert it to a WPCP. Another name that is used for these municipal required plans is an **Erosion and Sediment Control Plan (ESCP)**. It, and other aliases of it, is really the same type of document that describes pollution prevention practices at the construction site.

## ESCPs for Small Projects

Many municipal NPDES permits mandate the municipalities to require all projects that have soil disturbance less than an acre to submit an Erosion and Sediment Control Plan. Often owners of smaller projects do not know where to begin in preparing such a plan. Municipalities have prepared various flyers and guidance documents to walk them through the process. Others have prepared example ESCPs.

But, some municipalities have taken it a step further and actually created the plan for them ... at least, much of the plan. San Joaquin County has developed a standardized ESCP that provides seven steps for compliance for small projects and provides a description of typical BMPs. Most likely the project would still need to submit a drawing or site map showing the locations of the BMPs and control measures; but the standardized plan helps the project owner define what controls are needed on the project and makes the job of creating an ESCP much easier.

Check out the County's plan at:

[www.sjcleanwater.org/PDF%20Documents/SJCO\\_small\\_site\\_SWPPP07\\_10.pdf](http://www.sjcleanwater.org/PDF%20Documents/SJCO_small_site_SWPPP07_10.pdf)



## 10 Common SWPPP Problems

1. Risk determination is incorrectly calculated.
2. Maps are incomplete and do not have all of the information required by the CGP Attachment B.
3. Monitoring locations are not identified.
4. Effective erosion controls and soil covering measures have not been identified for areas of soil disturbance.
5. Supporting calculations are not included for the sizing and selection of the BMPs (which is required by the CGP).
6. The SWPPP narrative is too generic and has not been customized for a specific location.
7. The SWPPP includes BMP specifications and reference sheets for BMPs not utilized on the project.
8. Specific construction activities, phases, trades, and pollutant sources have not been identified in the SWPPP.
9. The QSP is not identified.
10. Incorrect project dates or no schedule included in the plan.

## Upcoming Training ...

Got SWPPP? Classes coming to Lodi:

- ✓ **Next Week** - QSP/QSD Training, April 22-24
- ✓ PDU Week – Free Workshops May 19-23, 2014
- ✓ CPESC Review and Exam – June 24-26, 2014

For more information about these classes, go to

[www.gotswppp.com](http://www.gotswppp.com).

*Need storm water training at your office or project location?  
Invite one of WGR's experienced QSPs to come and  
provide training for your crew.*

The poster features a dark, textured background with a diamond-plate pattern. At the top, it says "REGISTER TODAY AT WWW.PDUWEEK.ORG". The main text reads "Register Now" in a white, cursive font, followed by "PDU WEEK 2014" in large, bold, white block letters. Below that, it says "A WEEK OF FREE TRAINING MAY QUALIFY FOR PROFESSIONAL DEVELOPMENT UNITS INTERACTIVE ONLINE SESSIONS". The website "PDUweek.org" is prominently displayed in the center. At the bottom, it says "GOING LIVE MAY 19-23, 2014".

**Please contact us if you have any questions ...**

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**Technical Questions about Environmental Compliance?**

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# PDU

## WEEK 2014

### About PDU Week 2014...

*PDU Week 2014 is the second annual occurrence of this groundbreaking event. This year, we are seeking to utilize technology to provide high-quality training to as many people as possible, without requiring them to travel to a class location. We will be live streaming four different 1-hour-long presentations during the week of May 19-23, and will be offering these interactive workshops free of charge on the [PDUweek.org](http://PDUweek.org) website.*

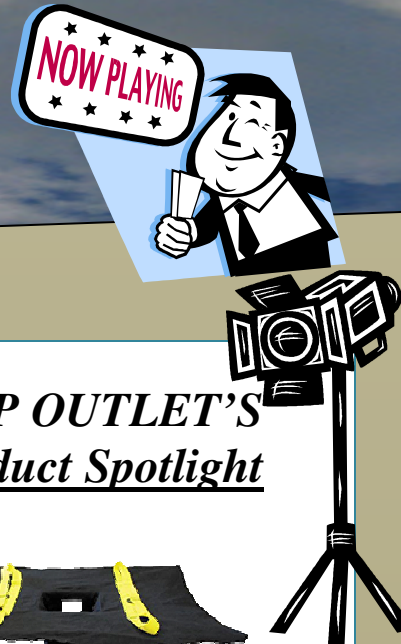
*PDU Week was designed to help storm water professionals fulfill their continuing education requirements. PDU Week does not issue continuing education or professional development units, but provides educational opportunities for the professional to meet their ongoing continuing education requirements. Each participant must use his or her best judgment in determining the applicability of these workshops in meeting their PDU requirements. We are doing our best to make sure that these classes are as qualifying as possible - to help with the documentation process, we will provide each participant with a personal certificate of completion for each one-hour workshop.*

*This year's theme is stabilization. We have invited industry experts and the regulatory community to provide insight on why stabilization is important and how it can be done in even very challenging situations. Whether you need PDUs or not, we hope you can join us for one or more of these educational events.*

### List of presentations...

Presentation	Presenters	Presentation Description
Monday, May 19 at 1:30 PM Inspections of Construction Projects - Enforcing Stabilization	Part 1 - Jacque Kelley and Rich Muhl of the State of California, Regional Water Quality Control Board - Central Valley  Part 2 - A panel of municipal storm water inspectors	Part 1 will be a discussion with State Water Board staff on the Construction General Permit's stabilization requirements, what they look for when inspecting a site, and common areas of misconception and noncompliance for final site stabilization. Part 2 will be a discussion with a panel of municipal storm water inspectors and what they look for when inspecting active construction sites.
Tuesday, May 20 at 1:30 PM Environmentally Friendly Stabilization Methods Using Recycled Materials	Jerame Renteriz of Zanker Recycling and Alex Sharpe of ZBest organic compost	How to stabilize disturbed soil areas using recycled compost, wood mulch, aggregate, and even recycled asphalt roofing material. The presentation will cover the environmental benefits of using recycled compost and the cost benefits for the project.
Wednesday, May 21 at 1:30 PM Living Walls and Stabilizing Impossible Situations	Craig Kolodge of Filtrexx	How to stabilize seemingly "impossible situations" using compost socks and mulch. The presentation will provide information on selecting the right types of controls/products, layering of BMPs, timing of the installation, logistics such as irrigation, plant selection, compost choices and options, maintenance, and long term up-keep, and relative cost.
Thursday, May 22 at 1:30 PM Ideas for Stabilizing Large Areas	Matt Lawson and Jason Arambula of Odyssey Companies Inc.	How to stabilize large areas of soil disturbances including large steep slopes and large relatively flat areas. Practical information to the viewers on what they need to consider for stabilizing a site using hydroseeding: such as guidance on preparing the site surfaces for hydroseed, selection of the proper hydroseed mix, fertilizers, tackifiers, and other logistics such as timing, irrigation, and maintenance.

It is free ... register now at [www.PDUweek.org](http://www.PDUweek.org)



**\$53.50**

### Universal or Oil Only Spill Bucket

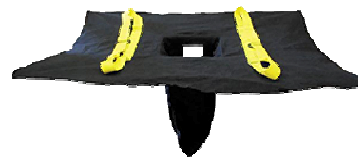
- Absorbs up to 5 gallons;
- UN Container 1H2/Y25/S;
- Snap top lid;
- Contents identified on easy to read label;



**Contents include:**

Approximately 2.5 gallons of granular absorbent, 6 Universal Spill Pads, 1 Universal Soc, Safety Glasses, Nitrile Gloves (Powder-free) and 2 Disposal Bags

### BMP OUTLET'S Product Spotlight



The Hornet's Nest Drain Inlet Filter is a unique, under-grate storm drain filter. The oversized base allows the filter to be used with a variety of size and shape drain inlets. Simply insert the filter into an open drain. Place the grate over the installed filter and trim the excess material for a custom fit and clean appearance. The yellow webbing secures the filter to the grate and doubles as lifting straps to quickly and easily remove the filter and grate for simple cleaning. The sediment collection cone has 4 overflow portals for high flow bypass during heavy storm events. \* The total water flow rate through the insert when new is in excess of 500 gpm. The bypass rate is approximately 700 gpm.

\* An available option is a replaceable, tethered oil absorbent pouch.

### Caltrans Gravel Bag \$3.30 ea.



All purpose sediment control device, which can be filled with rock up to 40 lbs. per bag.

Outer Material - 8 ounce Non-Woven Geotextile

Dimensions - 16" x 24"

Durability - 500 lb. burst strength

Flow Rate - 90 gpm/ft

Rock not included



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\$49.50**