May 2014

The Monthly Dirt

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

Stabilization

The Construction General Permit requires all risk levels and LUP projects to provide effective soil cover for inactive areas, all finished slopes, open space, utility backfill, and completed lots. "Inactive" is defined as areas of construction activity that have been disturbed and are not scheduled to be re-disturbed for at least 14 days. So, what is "effective soil cover"? It is stabilization of the soil surface so that soil particles do not become detached by water or wind. Stabilization is the theme for, not only this edition of **The Monthly Dirt**, but also PDU Week which will be held later this month. Experience shows us that this is one area of the SWPPP that is often underdeveloped, or completely overlooked, by the QSD. It is also usually the BMP for which QSPs seem to get the greatest amount of resistance from the contractors in the field. This winter we saw several projects receive notices of violations because disturbed soil surfaces were not stabilized resulting in runoff that was exceeding numeric action levels.

Stabilization is the ultimate goal of the Construction General Permit. When surfaces are stabilized, soil particles tend to not become detached, and thereby erosion is eliminated or greatly minimized. However, construction is inherently contrary to this goal. Construction disturbs soil surfaces. So, there is no wonder that this tug-of-war exists between those doing the construction and those enforcing the permit requirements. How is this tension between these two opposing objectives resolved? The answer is through careful site planning and scheduling. The following are four things to consider in stabilizing a site and preventing erosion:

1. **Protecting Vegetation -** If you attend any storm water class, one of the first things you will hear is the importance of protecting existing vegetation and limiting the area of soil disturbance. This is so fundamental, that to even mention it to a contractor or project owner seems to be insulting their intelligence. But, time after time on all different types of projects, we see this fundamental rule broken. We have inspected many projects where vegetation carelessly removed or removed long before it is actually necessary caused severe erosion problems resulting in the need for expensive temporary stabilization.
2. **Scheduling for success -** Another very basic rule to preparing an effective SWPPP is to coordinate the schedule to align with the storm season. Stating the obvious, no rain means no water erosion (although there may still be wind erosion). When and as possible, the construction schedule should be aligned so that the period of the greatest amount of disturbed soil exposure occurs during the dry season. Another way scheduling can be used to prevent erosion is to schedule activities performed towards the end of the project to an earlier date. Acceleration of the landscaping and asphalting phases to earlier in the project will provide an effective permanent cover and allow work to be performed on a stabilized surface.
3. **Cover Exposed Dirt –** Bottom line … the Permit requires an "effective soil cover" on all areas of soil disturbance. True, you don't have to cover it until it becomes inactive, but ultimately it must be covered. Important to note, that this requirement found in Attachments A, C, D, and E of the CGP is distinct from the stabilization requirements associated with the Notice of Termination. A site is not in compliance if the soil is either not actively being worked or is not covered.
4. **Temporary vs. Permanent Cover -** The Permit requires the project owner to utilize either temporary or permanent measures to achieve the effective soil cover. One reason that we believe many contractors balk at temporary covers is because it is considered an extra expense and one to be avoided. For this reason, we challenge contractors to move quickly into permanent cover. However, if that is not possible, temporary erosion control soil covers such as blown straw, tackifiers, bonded fiber matrix, and mulches are necessary.

Stabilization on Waiver Projects

Small Erosivity Projects don't require permit coverage and don't need a SWPPP … so, they also do not have to show that they have obtained final site stabilization for a Notice of Termination, … right?

Well, not exactly – while it is true that waiver projects do not need to file a NOT. They are required by the Water Board to establish stabilization. The permit states the following:

"Dischargers eligible for this waiver are exempt from Construction General Permit Coverage. In order to obtain the waiver, the discharger must certify to the State Water Board that small construction activity will occur only when the rainfall erosivity factor is less than 5 ("R" in the Revised Universal Soil Loss Equation). The period of construction activity begins at initial earth disturbance and ends with final stabilization. Where vegetation will be used for final stabilization, the date of installation of a practice that provides interim non-vegetative stabilization can be used for the end of the construction period. The operator must agree (as a condition waiver eligibility) to periodically inspect and properly maintain the area until the criteria for final stabilization as defined in the General Permit have been met. If use of this interim stabilization eligibility condition was relied on to qualify for the waiver, signature on the waiver with a certification statement constitutes acceptance of and commitment to complete the final stabilization process."

PDU Week FAQs

1. **What is a PDU?** PDU stands for Professional Development Unit and it is a continuing education requirement of many storm water professional certifications such as CPESC, CESSWI, and CISEC. Many QSPs and QSDs rely on one of these underlying certifications to meet the State's requirement.
2. **Do you issue PDUs?** No, the organizations that require PDUs state that it is up to the professional to make a determination whether certain training qualifies for a PDU. We provide opportunities to receive this training for free. We make every effort to assure that the material presented can qualify for credit. However, it is up to the professional to make the final determination.
3. **How many PDUs can I get?** It all depends upon which organization is requiring the PDUs, but generally you can receive one PDU per hour of instruction. There will be four 1-hour workshops offered which could equate to 4 PDUs.
4. **What if I don't need PDUs?** Even if you don't need PDUs, you can benefit from these classes. Anyone that has to comply with the Construction General Permit can learn valuable information about site stabilization from this year's workshops. We will have interviews with Regional Water Board staff, municipal inspectors, and experts in composting, hydroseeding, and permanent stabilization techniques. Join us on line for this live web broadcast. Best of all it is absolutely free!

Upcoming Training …

Got SWPPP? Classes coming to Lodi:

- ✓ PDU Week – Free Workshops May 19-23, 2014
- ✓ CPESC Review and Exam –June 24-26, 2014
- ✓ QSP/QSD Classes – July 22-24, 2014

For more information about these classes, go to 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.

Please contact us if you have any questions …

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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 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

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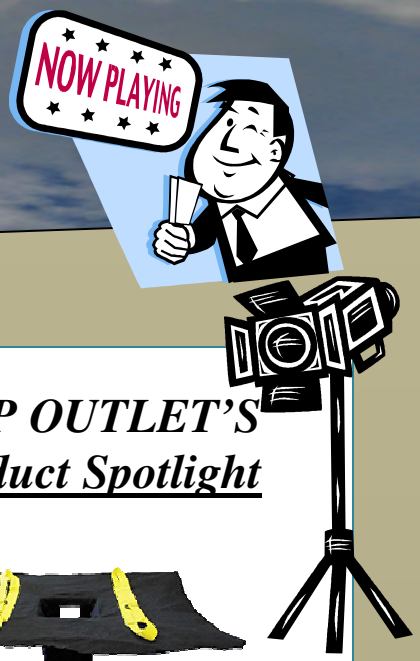

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- **Snap top lid;**
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Contents include:
Approximately 2.5 gallons of granular absorbent, 6 Universal Spill Pads, 1 Universal Soc, Safety Glasses, Nitrile Gloves (Powder-free) and 2 Disposal Bags

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$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
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Durability - 500 lb. burst strength
Flow Rate - 90 gpm/ft
Rock not included

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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.**

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