Section 4: Managing the Construction Site

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4.1 Mobilization

4.1.1. Posting the Storm Water Pollution Prevention Plan (SWPPP)

The SWPPP and its supporting documents must remain on the construction site or at a location posted at the job site. The materials must be available during business hours at all times throughout the project. All records and documents are to be compiled together in an orderly fashion. These provisions are in place to ensure that all records are available in the event a legal situation arises. The location of the SWPPP must be posted on the construction sign located on the perimeter of the project. The sign must be placed in a location where the general public can read the sign without entering the jobsite; this avoids liability and trespassing issues.

The SWPPP is comprised of two parts:
- Narrative Sheets in the SWPPP, Section D General Plan Notes.
- SWPPP plan sheets.

By reference, the SWPPP also incorporates the construction documents cover sheet which describes the project and location as required for the SWPPP. This format is recommended because it keeps all the SWPPP documentation plans and forms together in a single package. This information can be used as a stand alone document for meeting the requirements of the SD DENR General Permit for Storm Water Discharges Associated with Construction Activities (July 1, 2002).

In so far as possible, the first several pages of Section D – General Notes for Erosion and Sediment Control have been set up to provide the boiler plate information needed for the SWPPP. Issues such as maintenance, inspections, spill management, etc., have been addressed and provided there. However, every project will have to be reviewed to be sure that the general statements apply. Use the SWPPP Checklist to ensure that all SWPPP requirements are completed.

4.1.2. Initial installation of BMPs

When the SWPPP has been completed and posted and the Notice of Intent (NOI) accepted by SD DENR, the construction project may commence. Prior to the beginning of construction all temporary erosion and sediment controls must be installed according to the SWPPP. In order to ensure a successful plan, all stabilization measures should be installed in the order listed in the sequence of major events. Effort should be taken to ensure that all personnel involved with the installation of the controls are adequately trained. Improperly installed controls may actually increase the in-storm water pollution.
4.1.3. Mobilization Checklist for Initial Installation

Before construction begins, all temporary erosion and sediment controls are to be in place in accordance with the provisions of the SWPPP and the NOI. The mobilization checklist should be used to inspect the site to be sure all appropriate BMPs are in place just prior to commencement of any grading or surface disturbing activities. It is recommended that the completed checklist be maintained with the required SWPPP project records. While it is not a required checklist, it documents that all appropriate preparations were in place prior to beginning work. No construction activities should take place until all items on this list have been completed. Mobilization Checklist

4.2. Maintaining the SWPPP in the field

4.2.1. Procedure for Making Revisions to the SWPPP

Use Form – DOT-298 to record changes made to the SWPPP and to correct any deficiencies or unanticipated erosion and sediment control needs. Based on the information recorded on the form, revise the SWPPP document text or drawings to reflect the changes noted on the form. Changes can be accomplished by symbols and notes on the plan sheets. Notes should reference the date and the form on which the changes are based.

4.2.2. SWPPP Modification Form

For full compliance with the National Pollutant Discharge Elimination System (NPDES) storm water permit, and to ensure SDDOT is in compliance, the SWPPP must be consistent with the General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) and must accurately reflect existing field conditions. If field conditions require changes, the SWPPP must be revised to reflect the necessary changes. These documents should be current at all times and available for inspection by SD DENR or U.S. EPA inspectors. This is important because the SWPPP is developed according to site specific features. When the site conditions change, there is a possibility of a significant effect on the potential for discharging pollutants into the storm water.

Deficiencies noted in regular inspections must be corrected in a timely matter but in no case more than 7 days of the discovery. In the event that site conditions limit access, action should be taken immediately to replace, repair or install an alternate BMP to ensure that no sediment is discharged from the site. Any condition that prevents completing the repair in the 24 hour period along with the actions taken to prevent any sediment discharge must be documented. Any changes required by the permitting authority shall be made within 7 days of the notification. Document the changes on the SWPPP Modification Form – DOT-298 and submit it to the permitting agency.
4.3. Inspections

No BMPs are maintenance free. Without regular, consistent inspections and maintenance, BMPs will not successfully control potential spills, erosion, and sediment. Once construction activities begin, SD DENR requires regular inspections of all erosion and sediment controls. It is important to remember that these inspections include all facets of the SWPPP. This includes all materials storage areas, vehicle storage and maintenance areas, as well as all structural BMPs used for erosion and sediment control. The results of these inspections will determine the extent of maintenance required.

4.3.1. Inspection Requirements

SD DENR requires that site inspections be conducted at least once every 7 days and within 24 hours following a rainfall event of 0.5 in or significant snowmelt that could cause surface erosion. During winter freezing conditions where runoff is unlikely, inspections can be conducted once per month. These inspections should be done by personnel who are familiar with permit conditions and the proper installation and operation of pollution prevention measures.

As noted in the previous section the inspections must include disturbed areas of the construction site that have not been finally stabilized (70% adjacent cover), areas used to store materials, structural control measures (erosion and sediment control BMPs), and locations where vehicles enter and exit the construction site.

When conducting inspections, the inspector must address three critical areas of concern:

- Is there any evidence of, or the potential for, pollutants (sediment) leaving the site?
- Are the erosion and sediment control BMPs identified in the plan operating correctly?
- Is sediment being tracked off the site?

An inspection report must be completed that summarizes the results of the inspection and should include the name and title of the person making the inspection, date of the inspection, major observations, and any corrective measures taken. These reports must be retained as part of the plan for at least three years after the site has reached final stabilization, and coverage under the permit has been terminated. These inspection reports must include any incidents of noncompliance.

Based on the results of the inspection, the plan must be revised and implemented no later than 7 calendar days following the inspection. In the event that no incidents of noncompliance are identified, the inspection report should contain a certification that the site is in compliance with the plan and the permit. The inspection report must be signed in accordance with signature authority guidelines included in the SD DENR General Permit for Storm Water Discharges Associated with Construction Activities.
There is no better time to determine if a BMP is working correctly than immediately after a rainfall event. During this period you can see if everything is working properly and can often identify a potential problem even before it starts. In the event of flooding or other situations which prohibit access, it is important to document the situation that prevents access or taking corrective action and noting any additional corrective actions taken to prevent possible discharges from the site. Corrective actions should then be taken as soon as access is possible.

SDDOT requires that all of its project engineers and inspectors, as well as the contractor’s project superintendents complete the SDDOT Erosion and Sediment Control Certification Course to ensure that inspectors understand the requirements for erosion and sediment control on construction sites. Inspectors and other project management personnel must be familiar with the project SWPPP, as well as the proper selection, installation, operation, and maintenance of erosion and sediment control measures.

4.3.2. SWPPP Site Inspection Form
Use the SWPPP Site Inspection Form DOT-298 to record required site inspections during the course of constructing a project. It is primary tool for ensuring compliance with SD DENR’s General Permit for Storm Water Discharges Associated with Construction Activities. Complete the forms and maintain them with the other SWPPP documentation.

4.3.3. Final Inspection Checklist
Use the Final Inspection Checklist for the final inspection of the site, leading up to filing the Notice of Termination (NOT). Prior to filing the NOT, all temporary erosion and sediment controls are to be removed from the site. This checklist focuses on the issues related to filing the NOT. While it is not specifically required by SD DENR, it does document the critical issues needed to close out the project and file the NOT. If used as recommended, the completed checklist should be filed with the other SWPPP documents for the project and maintained for the required three year period.