

Linear Utility/Group Job

Water Pollution Control Plan

for Project:

Located at:

Address:

WPCP Prepared by:

Company:

Individual:

Address:

Preparation Date:

Prepared for:

City of San Diego

Department:

Address:

Project Start Date:

Project End Date:

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Table of Contents

[1.0 WPCP Requirements 1](#_Toc516398747)

[1.1 Introduction 1](#_Toc516398748)

[1.2 Objectives 2](#_Toc516398749)

[1.3 Responsibility for WPCP Development and Implementation 3](#_Toc516398750)

[1.3.1 Qualified Contact Person 3](#_Toc516398751)

[1.3.2 Self-Inspections 5](#_Toc516398752)

[1.4 Availability 6](#_Toc516398753)

[1.5 Amendments 6](#_Toc516398754)

[1.6 Storm Water Discharges to ASBS 6](#_Toc516398755)

[1.7 Non-Storm Water Discharges 6](#_Toc516398756)

[2.0 Project Information 8](#_Toc516398757)

[2.1 Project and Site Description 8](#_Toc516398758)

[2.1.1 Project Location 8](#_Toc516398759)

[2.1.2 Project Description 9](#_Toc516398760)

[2.1.3 Construction Schedule 10](#_Toc516398761)

[2.1.4 Site Priority 10](#_Toc516398762)

[2.1.5 Site Features, Construction Activities, and Associated Potential Pollutants 11](#_Toc516398763)

[2.2 Site Map Development 15](#_Toc516398764)

[3.0 Best Management Practices 16](#_Toc516398765)

[3.1 Project Planning 16](#_Toc516398766)

[3.1.1 Scheduling/Phasing Plan 16](#_Toc516398767)

[3.1.2 Resource Protection 17](#_Toc516398768)

[3.2 Good Site Management “Housekeeping” 18](#_Toc516398769)

[3.2.1 Material Storage and Handling 18](#_Toc516398770)

[3.2.2 Waste Management 19](#_Toc516398771)

[3.2.3 Vehicle and Equipment Management 21](#_Toc516398772)

[3.2.4 Spill Control 22](#_Toc516398773)

[3.3 Non-Storm Water Management Controls 23](#_Toc516398774)

[3.4 Erosion and Sediment Controls 25](#_Toc516398775)

[3.5 Dust Control 29](#_Toc516398776)

[3.6 Run-on and Runoff Controls 29](#_Toc516398777)

[3.7 Final Stabilization 30](#_Toc516398778)

[4.0 Best Management Practice Maintenance and Inspection 32](#_Toc516398779)

[4.1 BMP Maintenance 32](#_Toc516398780)

[4.2 BMP Inspections 36](#_Toc516398781)

[4.3 Weather Triggered Action Plan 36](#_Toc516398782)

[4.4 Recordkeeping and Reports 37](#_Toc516398783)

[5.0 Post-Construction Pollutant Control 38](#_Toc516398784)

[6.0 References 39](#_Toc516398785)

Appendices

Appendix A: Amendment Log

Appendix B: Site Map

Appendix C: Certification (to be completed by applicant)

Appendix D: City of San Diego form DS-560, Storm Water Requirements Applicability Checklist

Appendix E: BMP Fact Sheets

Appendix F: Self-Inspection Check List

Appendix G: Completed Weather Triggered Action Plans

Appendix H: Scheduling/Phasing Plan

Appendix I: Environmental Permits

Appendix J: Additional BMPs Required for Water Quality Sensitive Areas

Appendix K: Potable Water Discharge Requirements Certification

**List of Tables**

[Table 1: Qualified WPCP Preparer and Contact Person and Designees 5](#_Toc516398793)

[Table 2: Project Location and Contact Information 8](#_Toc516398794)

[Table 3: Project Description 9](#_Toc516398795)

[Table 4. Construction Schedule 10](#_Toc516398796)

[Table 5: Site Priority and Minimum Inspection Frequency 11](#_Toc516398797)

[Table 6: Determination of Site Features, Activities, and Potential Pollutants 13](#_Toc516398798)

[Table 7. Resource Protection BMPs 18](#_Toc516398799)

[Table 8: Material Storage and Handling BMPs 19](#_Toc516398800)

[Table 9: Waste Management BMPs 20](#_Toc516398801)

[Table 10: Vehicle and Equipment Management BMPs 21](#_Toc516398802)

[Table 11: Spill Control BMPs 23](#_Toc516398803)

[Table 12: Non-Storm Water Management BMPs 25](#_Toc516398804)

[Table 13: Erosion and Sediment Control BMPs 28](#_Toc516398805)

[Table 14: Particulate and Dust Control BMP 29](#_Toc516398806)

[Table 15: Run-On and Runoff Control BMPs 30](#_Toc516398807)

[Table 16: Final Stabilization BMPs 31](#_Toc516398808)

[Table 17: BMP Maintenance Requirements 32](#_Toc516398809)

[Table 18. WTAP Implementation Requirements 37](#_Toc516398810)

[Table 19. Post-Construction Pollutant Controls 38](#_Toc516398811)

# 1.0 WPCP Requirements

# 1.1 Introduction

The San Diego Regional Water Quality Control Board (RWQCB) adopted Order No. R9-2013-0001 as amended by Order Nos. R9-2015-0001 and R9-2015-0100, *National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s)* *Draining the Watersheds within the San Diego Region* on November 18, 2015(MS4 Permit). The MS4 Permit requires the City of San Diego (City) to necessitate implementing effective best management practices (BMPs) to reduce discharges of pollutants in storm water from construction sites to the maximum extent practicable and effectively prohibit non-storm water discharges from construction sites into the MS4. These BMPs must be site specific, construction phase appropriate, and implemented at each construction site year-round. Dry season BMP implementation must plan for and address unseasonal rain events that may occur during the dry season (May 1 through September 30).

Construction projects that result in disturbance of one acre or more of total land area or are part of a larger common plan of development or sale must obtain coverage under the State Water Resource Control Board’s (SWRCB’s) *NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ* NPDES No. CAS000002 as amended by Order Nos. 2010-0014-DWQ and 2012-006-DWQ (Construction General Permit). The Construction General Permit requires developing and implementing a Storm Water Pollution Prevention Plan (SWPPP).

A Water Pollution Control Plan (WPCP) must be developed and implemented for all Group Job projects that:

* + - Result in disturbance of less than one acre of total land area, or are considered maintenance projects and are not part of a larger common plan of development or sale;
    - Result in disturbance of an acre or more of total land area and are considered regular maintenance projects performed to restore the original line, grade, or capacity of the facility; and
    - Result in disturbance of one to five acres of total land area and qualify for a Rainfall Erosivity Waiver from the State Water Resource Control Board’s (SWRCB’s) NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ NPDES No. CAS000002 (Construction General Permit).

This template was developed specifically to meet the City’s WPCP requirement for Group Jobs, which are maintenance projects performed in City right-of-ways, and generally, but not always, linear underground projects. Group Jobs may consist of, but are not limited to, the following activities:

* + - Performing asphalt and concrete cutting;
    - Trenching and shoring the trench;
    - Stockpiling trench backfill, aggregate, cold mix asphalt, etc.;
    - Bypass piping and pumping of potable water or sewage;
    - Removing pipe laterals, manholes, vaults, and related appurtenances that are disposed of offsite;
    - Covering trenches at the end of each day with metal plates and cold mix asphalt;
    - Installing new pipeline and associated features;
    - Backfilling the trench upon pipeline completion;
    - Restoring the site to its original condition, which may include replacing asphalt, concrete, and curb/gutter and landscaping repair;
    - Roadway striping; and
    - Cleaning the site.

The WPCP must be certified by the applicant (see **Appendix C**)

Since Group Jobs are generally similar in nature, assumptions have been made in this Group Job WPCP template regarding the potential pollutants, pollutant sources, construction materials, and wastes. For instance, it is assumed little to no erosion sources will exist, as Group Jobs are usually located in paved roadways (i.e., other than trenching, stockpiling trench soils, and very minor landscape work, no earthwork is performed). The projects typically don’t have disturbed slopes. Vehicle (truck and auto) fueling, maintenance, and cleaning are performed offsite. Equipment (e.g., backhoes, bobcats, pumps, etc.) fueling and emergency maintenance may be performed onsite but washing occurs offsite. Potable water sources, other than the water lines, are not present. **If any of these assumptions are not accurate for the project, this Group Job WPCP template must be modified to reflect the appropriate site conditions, construction activities, potential pollutants, and BMPs to control potential pollutants.**

This WPCP is required to be updated by the WPCP Preparer (see **Section 1.3**) whenever there is a change in construction operations or BMP implementation or is deemed necessary by the Resident Engineer (RE).

**NOTE: It is the responsibility of the project owner to ensure that all construction activities comply with local and state regulations, including Part 2 of the Storm Water Standards Manual (2018) and San Diego Municipal Code Section 43.03. The guidance and template provided here are for the WPCP developer’s convenience and do not alleviate responsibility on part of the project owner to determine the appropriate level of BMP planning and implementation to prevent pollutant discharges.** *The WPCP developer must complete the text and check boxes. Additional completion information is provided in red font.*

# 1.2 Objectives

The main objectives of the WPCP are:

* To identify all pollutant sources which may affect the quality of storm water discharges from the site associated with construction activities;
* To identify authorized non-storm water discharges and eliminate unauthorized non-storm water discharges, illicit connections, and dumping;
* To establish, construct, implement, and maintain BMPs to reduce or eliminate pollutants in storm water discharges and authorized non–storm water discharges from the construction site; and
* To develop an inspection program to determine the effectiveness of site BMPs.

# 1.3 Responsibility for WPCP Development and Implementation

The WPCP must be prepared, certified, and amended by a Qualified WPCP Preparer as defined in *Storm Water Standards – Part 2l (2018)* if the project meets the following criteria:

* Not subject to Construction General Permit requirements; and
* Determined to be a Priority Development Project (PDP), per Part 1 of the Storm Water Standards; and
* Located in the Los Peñasquitos Watershed, adjacent to or directly discharges to an Environmentally Sensitive Area, or discharges to an ASBS.

The Qualified WPCP Preparer shall meet at least one of the following registrations or certifications:

1. A qualified SWPPP developer (QSD);
2. A qualified SWPPP practitioner (QSP);
3. A California registered civil engineer;
4. A California registered geologist;
5. A California registered landscape architect;
6. A professional hydrologist registered through the American Institute of Hydrology;
7. A certified professional soil scientist registered through the Soil Science Society of America;
8. A certified professional in erosion and sediment control registered through EnviroCert International, Inc.;
9. A certified professional in storm water quality registered through EnviroCert International, Inc.;
10. A certified erosion, sediment, and storm water inspector registered through EnviroCert International, Inc.;
11. A certified inspector of sediment and erosion control registered through Certified Inspector of Sediment and Erosion Control Inc.; or
12. A certified professional in erosion and sediment control registered through the National Institute for Certification in Engineering Technologies.

The WPCPs that do not require a Qualified WPCP Preparer must be prepared, certified, and amended by a Qualified Contact Person (QCP).

Any hydrology or hydraulic calculations, soils report or geotechnical reports prepared in support of this WPCP must be prepared by a professional engineer with appropriate registration qualifications issued by the State of California.

## 1.3.1 Qualified Contact Person

A QCP, as per the City’s *Storm Water Standards – Part 2* (2018) definition, must be assigned to the project. The QCP must be specifically-trained in storm water pollution prevention, including the installation and maintenance of sediment and erosion control measures. The QCP may designate additional, trained persons to assist with QCP responsibilities. The specific duties of the QCP and persons delegated by the QCP are:

* + - Coordinating with the appropriate City representatives to ensure the project complies with the WPCP and approved plans at all times;
    - Implementing all elements of the WPCP, including prompt and effective erosion, sediment, tracking, and wind erosion control measures and management of non-storm water discharges and construction materials and liquid, solid, and hazardous wastes;
    - Assigning authority to mobilize crews in order to conduct immediate and complete BMP repairs and providing storm water pollution prevention training;
    - Tracking weather conditions, as reported on the National Weather Service Forecast’s website [[http://www.noaa.gov/wx.html](http://www.noaa.gov/wx.html)]);
    - Performing self-inspections;
    - Informing the proper City representatives of non-compliance, such as unauthorized discharges, illicit connections or dumping activities, and immediately correcting the problems;
    - Overseeing site stabilization; and
    - Ensuring that the WPCP is available onsite at all times during business hours; and
    - Ensuring that WPCP records are retained for a minimum of three years.

**Table 1** provides the name and contact information for the WPCP Preparer and QCP and any additional persons designated by the QCP.

*[Complete Table 1 with the name and contact information for the WPCP Preparer and QCP and any additional persons designated by the QCP.]*

Table 1: Qualified WPCP Preparer and Contact Person and Designees

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Name** | **Company/ Organization** | **Phone Number** |
| **Qualified WPCP Preparer** |  |  |  |
| **Qualified Contact Person** |  |  |  |
| **Additional Persons Designated by the Qualified Contact Person** |  |  |  |
|  |  |  |

## 1.3.2 Self-Inspections

The QCP or designee is required to perform self-inspections, as per the City’s *Storm Water Standards – Part 2* (2018). The objectives are to:

* + - Demonstrate the site is in compliance with the City’s *Storm Water Standards – Part 2* (2018) and San Diego Municipal Code Section 43.03;
    - Ensure that the owner/contractor takes full responsibility for managing storm water pollution caused by the project site’s construction activities;
    - Ensure that storm water BMPs are properly documented, implemented, and are functioning effectively.;
    - Identify BMP maintenance (e.g., sediment removal) and repair needs;
    - Ensure that the site-specific WPCP is fully implemented and updated; and
    - Ensure final stabilization of the site before demobilization.

The City’s *Storm Water Standards – Part 2 (2018)* requires performing self-inspections throughout the life of the project (until final stabilization is achieved). Self-inspections are not required during dangerous weather conditions such as flooding and electrical storms or outside of scheduled site business hours. Self-inspections are to be performed:

* + - At 24-hour intervals during extended rainfall events;
    - Daily during all phases of construction during the wet season; and
    - Weekly during all phases of construction during the dry season.

Additionally, weather forecasting must be performed daily and a WTAP is required for every project. See **Section 4.3** for WTAP implementation requirements and timelines.

During self-inspections, the QCP or designee will identify and record BMPs that are in need of maintenance to operate effectively, have failed, or could fail to operate as intended and if additional BMPs are needed. If additional BMPs are necessary, the WPCP must be revised accordingly and submitted to the RE for review. Self-inspections must be documented using a checklist (generated and formatted by the QCP or designee), documentation of daily inspections is at the discretion of the QCP. The self-inspection checklist must also note the date, time, and weather conditions during the inspection. Completed checklists must be kept in **Appendix F** and made available upon request. During self-inspections, storm water discharges must be monitored to determine the presence of pollutants. If any failures or deficiencies are identified, repairs or design changes must begin to be implemented within 72 hours and noted on the self-inspection checklist.

# 1.4 Availability

This WPCP must remain onsite at all times during business hours and be readily available for review by the U.S. Environmental Protection Agency (EPA), SWRCB, RWQCB, City representatives, and all operating personnel for the duration of the project. Authorized representatives from the EPA, SWRCB, RWQCB, and the City shall be permitted entry to the site for reviewing this WPCP, inspecting the site, and/or collecting storm water samples.

# 1.5 Amendments

This WPCP shall be amended whenever there is a change in construction or operations which may affect the discharge of pollutants to surface waters, groundwater, or to the City’s MS4 or are deemed necessary by the RE. Amendments shall be documented in the Amendment Log (**Appendix A**).

# 1.6 Storm Water Discharges to ASBS

According to the SWRCB ASBS Resolution No. 2012-0031, existing storm water discharges into an ASBS are allowed only under the following conditions:

1. The discharges are authorized by an NPDES permit issued by the SWRCB or RWQCB;
2. The discharges comply with all of the applicable terms, prohibitions, and special conditions contained in these Special Protections; and
3. The discharges:
   1. Are essential for flood control or slope stability, including roof, landscape, road, and parking lot drainage;
   2. Are designed to prevent soil erosion;
   3. Occur only during wet weather; and
   4. Are composed of only storm water runoff.

# 1.7 Non-Storm Water Discharges

Discharging any material other than storm water to Waters of the State or to the City’s MS4 is prohibited. However, certain exceptions apply.

Per Attachment A of the MS4 Permit, the following non-storm water discharges are allowed, provided that the discharges are essential for emergency response purposes, structural stability, slope stability, or occur naturally:

1. Discharges associated with emergency firefighting operations;
2. Foundation and footing drains;
3. Water from crawl space or basement pumps;
4. Hillside dewatering;
5. Naturally occurring groundwater seepage via a storm drain; and
6. Non-anthropogenic flows from a naturally occurring stream via a culvert or storm drain, as long as there are no contributions of anthropogenic runoff.

See the City’s *Storm Water Standards - Part 2 (2018)* to determine applicable non-storm water regulations.

# 

# 2.0 Project Information

# 2.1 Project and Site Description

This section provides project information relevant to the development of this WPCP.

## 2.1.1 Project Location

The project location and identifying information are provided in **Table 2**.

*[Complete Table 2.]*

Table 2: Project Location and Contact Information

|  |  |  |  |
| --- | --- | --- | --- |
| Contact Information | | | |
| Applicant Name: | Contact Name | | |
| Mailing Address: | City: | State: | Zip Code: |
| Telephone No.: | | | |
| **Project Information** | | | |

|  |  |  |  |
| --- | --- | --- | --- |
| Address: | City: | State: | Zip Code: |
| APN No.: | City Project Tracking Number: For CIP use WBS# | | |
| Contractor Company Name: | | Contact Name: | |
| Address: | City: | State: CA | Zip Code: |
| Telephone No.: | Email address: | | |
| Qualified WPCP Preparer: | | | |
| Telephone No.: | Email address: | | |
| Qualified Contact Person (QCP)\*: | | | |
| Telephone No.: | Email address: | | |

|  |
| --- |
| **City Enforcement Agency Information** |
| Telephone No.: (619) 235-1000 (Storm Water Hotline)  Website: [Storm Water Division - Storm Water Service Request](http://www.sandiego.gov/stormwater/services/servicerequest.shtml) |

\* See **Section 1.3.1** for definition.

## 2.1.2 Project Description

The project description is provided in **Table 3**.

*[Complete Table 3.]*

Table 3: Project Description

|  |  |
| --- | --- |
| **Project Description** | |
| Project Name: |  |
| Total Project Acreage, including set-up and laydown areas: |  |
| Estimated Disturbed Area (acres): |  |
| Project Scope: |  |
| Land Use Type (Existing/Proposed): |  |
| Existing Impervious/ Pervious Areas (Acres): |  |
| Proposed Impervious/Pervious Areas (Acres): |  |
| Watershed: |  |
| Receiving Water Body: |  |
| 303(d) Listed Impairments: |  |
| Soil Type: |  |
| Existing and Planned Storm Water Features: |  |
| Sources of Run-on to the Site: |  |
| Discharge Locations: |  |
| Other Site Features: |  |

## 2.1.3 Construction Schedule

The construction schedule is provided in **Table 4**, including anticipated activities to be performed in the wet season and dry season, the phase of construction, and construction BMP installation and removal. The wet season is October 1 through April 30 of each year. The construction schedule will serve as the basis for the BMP phasing plan in **Section 3.1.1** and **Appendix H**. In addition, the schedule must identify anticipated periods of inactivity exceeding 14 days.

Table 4. Construction Schedule

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Phase of Construction** | **Construction Activity** | **Start Date** | **Finish Date** | **Wet Season (Y/N)** |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

## 2.1.4 Site Priority

Construction site priority determines the frequency of inspections that will be conducted by City staff. *[Select site priority]*

Table 5: Site Priority and Minimum Inspection Frequency

| **Priority** | **Criteria** | **Wet Season**  **(October 1 to April 30)** | **Dry Season**  **(May 1 to September 30)** | **Check One** |
| --- | --- | --- | --- | --- |
| **ASBS** | Projects located in an Area of Special Biological Significance (ASBS) watershed. A map of the ASBS watersheds can be found in Appendix A of Part 2 of the City of San Diego Storm Water Standards (2018). | Weekly | Quarterly |  |
| **High1** | 1. Projects that qualify as Risk Level 2 or Risk Level 3 per the CGP and not located in an ASBS watershed. 2. Projects that qualify as LUP Type 2 or LUP Type 3 per the CGP and not located in an ASBS watershed. | Bi-weekly | Quarterly |  |
| **Medium** | 1. Projects that are not located in an ASBS watershed or designated as a high priority site. 2. Projects that qualify as Risk Level 1 or LUP Type 1 per the CGP and not located in an ASBS watershed. 3. WPCP projects located within the Los Peñasquitos Watershed Management Area. | Monthly | Quarterly |  |
| **Low** | Projects not subject to a medium or high site priority designation and are not located in an ASBS watershed. | Quarterly | As-Needed |  |
| **Is the project covered under a Rainfall Erosivity Waiver by the RWQCB?** | | ❒ Yes  ❒ No | | |
| **If “Yes,” provide Waiver# and include a copy of the NOI in Appendix C.** | | | | |
| **1Note that this template is not applicable for “High” Priority projects.** | | | | |

## 2.1.5 Site Features, Construction Activities, and Associated Potential Pollutants

Potential pollutant sources may stem from construction materials used onsite that are not designed to be outdoors and exposed to environmental conditions (i.e., are used in the process of construction, but are not the final product). Construction materials have the potential to come into contact with storm water when stored or used outdoors on the site.

*[The questions in Table 6 are designed to assist with selecting appropriate BMPs for the site; please check “Yes” or “No” and provide additional information if needed.]*

| Table 6: Determination of Site Features, Activities, and Potential Pollutants | | | | | |
| --- | --- | --- | --- | --- | --- |
| **No.** | **Site Feature Question** | **No** | **Yes** | **If *Yes*, Select BMPs from Table:** | **Potential Pollutant Sources (add, if not listed)** |
| 1 | Is the jobsite adjacent to a waterway or sensitive habitat (e.g., wetland, vernal pool, etc.)? |  |  | 7 | NA |
| 2 | Will there be asphalt paving, cutting, and/or patching? |  |  | 8 | Asphalt, aggregate |
| 3 | Will there be storage of construction materials that have the potential to pollute storm water, such as Portland cement, curing compounds, asphalt emulsions, etc.? |  |  | 8 | Construction materials, *please specify:* |
| 4 | Will there be slurries from concrete or mortar mixing, coring, or saw cutting? |  |  | 8, 9 and 11 | Concrete materials, aggregate, slurry water |
| 5 | Will wash water or liquid waste be generated from this project? |  |  | 9, 11, and  12 | Liquid waste,  *please specify:* |
| 6 | Will there be stockpiling (i.e., soil, concrete, solid waste, etc.) for over 24 hours? |  |  | 9 and 13 | Stockpiled material, *please specify:* |
| 7 | Will trash or solid wastes (including landscaping wastes) be generated from this project? |  |  | 9 | Solid waste,  *please specify:* |
| 8 | Will hazardous materials or wastes, including paint, be stored or handled at the jobsite? |  |  | 9 and 11 | Hazardous material, *please specify:* |
| 9 | Will portable sanitary facilities (“Porta-potties”) be used at the jobsite? |  |  | 9 and 11 | Sanitary waste |
| 10 | Will a wastewater bypass be utilized as part of the project? |  |  | 9 and 11 | Wastewater |
| 11 | Will construction equipment and/or vehicles be stored, fueled, or maintained at the jobsite? |  |  | 10, 11,  and 12 | Engine fluids, fuels, oil, grease |
| 12 | Will there be dewatering operations? |  |  | 12 | Dewatering water, *please specify:* |
| 13 | If project is located within the ASBS watershed non-storm water discharges (e.g. hydrostatic testing, potable water, etc.) are prohibited. Discharges shall be located a sufficient distance from such designated areas to assure maintenance of natural water quality conditions in these areas. |  |  | 12 | NA |
| 14 | Will there be soil disturbance activities (e.g., stockpiling, trenching, etc.)? |  |  | 13 | Sediment |
| 15 | Will dust (e.g., from driving on unpaved roads, etc.) or particulates (e.g., from sandblasting, concrete cutting, painting, etc.) be generated from this project? |  |  | 14 | Sediment, particulate construction materials, *please specify:* |
| 16 | Will the site discharge storm water to nearby storm drain inlets? |  |  | 13 and 15 | NA |
| 17 | Is there run-on to the jobsite from surrounding areas? |  |  | 15 | Sediment  Other: List |
| 18 | Will concentrated flows and/or large accumulations of water occur at the jobsite? |  |  | 15 | Sediment |
| 19 | Other activities will be performed that are not described above? |  |  | Select applicable BMPs from Tables 7–15 | *Please specify:* |
| 20 | Final stabilization of the site is required. | - |  | 16 | Not applicable |

# 2.2 Site Map Development

A Site Map must be developed and included as **Appendix B** of this WPCP. Several sheets may be used to illustrate the phasing of BMP implementation as construction progresses over time. When two or more sheets are used to illustrate the plan view, an index sheet is required. The Site Map must include all of the following, where applicable:

* + - Legend, north arrow, and scale of the drawing;
    - The project’s surrounding area (vicinity map);
    - The construction site boundary and limits of disturbance;
    - Key site features such as steep slopes, highly erodible soils, etc., including State and Federal wetlands, if any;
    - Storm water conveyance features including, but not limited to all delineated streams and drainage ways; storm drain inlets and outlets; curbs and gutters; and swales and channels;
    - Anticipated discharge points for runoff (i.e. storm water, groundwater, and construction wastewater such as dewatering byproducts);
    - Drainage areas and direction of flow;
    - Location of nearby water bodies (including Clean Water Act Section 303(d) List of Impaired Segments in the site’s vicinity);
    - Location of entrance/exits to the project area;
    - Areas of soil disturbance and potential pollutant sources;
    - Material, stockpile, and waste storage areas (e.g., trash, soil, fuel, construction materials);
    - Vehicle and equipment fueling, wash, and maintenance areas;
    - Locations of portable sanitary facilities;
    - Locations where underlying soil is potentially contaminated;
    - Locations of all BMP implementation areas including erosion controls, sediment controls, dewatering controls, and soil stabilization controls, where applicable; and
    - Locations of post-construction BMPs (as applicable).

The Site Map shall be updated as construction progresses to provide current project and BMP status, as well as future planned operations and BMP implementation.

*[Develop a Site Map that includes all the features listed above and include as Appendix B. Update as necessary.]*

# 3.0 Best Management Practices

The BMPs listed in this WPCP will be implemented on a year-round basis throughout the project’s duration, not solely during seasons in which the probability of a rain event is high. All areas that have been disturbed and are not re-disturbed for 14 days must be stabilized (i.e., exposed soil will be covered). Sufficient BMP materials will be maintained at the jobsite to allow implementation with this WPCP and emergency installation in the event of a breach. Locations where BMPs will be implemented are to be shown on the Site Map in **Appendix B**.

BMPs must be implemented on construction sites to reduce pollution to the maximum extent practicable. The City’s *Storm Water Standards – Part 2* (2018) outlines the requirements for construction storm water BMPs. The following BMP categories must be addressed:

* + - Project Planning, *Storm Water Standards – Part 2* (2018)Table 5-1
    - Good Site Management “Housekeeping”, *Storm Water Standards – Part 2* (2018)Table 5-2
    - Non-Storm Water Management, *Storm Water Standards – Part 2* (2018)Table 5-3
    - Erosion Control, *Storm Water Standards – Part 2* (2018)Table 5-4
    - Sediment Control, *Storm Water Standards – Part 2* (2018)Table 5-5
    - Run-on and Runoff Control, *Storm Water Standards – Part 2* (2018)Table 5-6

Note: Active/Passive Sediment Treatment is unlikely to apply to projects preparing WPCPs.

BMPs from each of the above categories must be used together as a system in order to prevent potential pollutant discharges. Each category is generally described and applicable BMPs are listed in the following sections. Projects containing site features identified with a “yes” answer in **Table 6** must utilize BMPs from the applicable BMP table(s). If no BMPs from a specific table are selected, an explanation must be provided. For BMP implementation details, refer to:

* + - California Stormwater Quality Association (CASQA) *Construction BMP Handbook Portal*, 2015, online at: <http://www.casqa.org/LeftNavigation/ConstructionBMPHandbookPortalSWPPPTemplate/tabid/200/Default.aspx>, (subscription required); and
    - California Department of Transportation (Caltrans) *Construction Site BMP Handbook*, 2017, online at: http://www.dot.ca.gov/hq/construc/stormwater/documents/CSBMP-May-2017-Final.pdf

# 3.1 Project Planning

## 3.1.1 Scheduling/Phasing Plan

A scheduling/phasing plan must be developed for each project to address work activities and BMP sequencing for each construction phase (i.e., demolition, mass grading, rough grading, final grading, and stabilization). It is the responsibility of the Qualified WPCP Preparer to develop the project-specific scheduling/phasing plan, clearly denoting BMP installation activities. This plan must identify steps the project will implement to:

1. Reduce the amount of soil exposed at any one time and during periods of high precipitation potential;
2. Maintain stabilized areas; and
3. Minimize work areas, staging areas, and construction roads.

This plan must consist of a listed sequence of construction activities and BMP installation activities which identifies the specific order in which construction activities and BMPs must be implemented.

During construction, the City may require additional phasing or scheduling plans if conditions change, current plans do not address work activities and BMPs adequately, or the City otherwise identifies a potential risk of discharge.

The scheduling/phasing plan must be updated for each phase of construction and kept onsite and made available for inspection upon request by a representative of the City, SDRWQCB, or the SWRCB.

*[Develop a scheduling/phasing plan that addresses the major construction phases and activities included in this project, as well as the implementation of BMPs in relation to construction activities. An example scheduling/phasing plan consists of a sequence of BMP installation activities for each phase is provided below. Activities are presented in the order (sequence) they are expected to be completed. BMP installation activities are indicated in italics. Note the below is provided as an example only. Project specific activities and BMPs must be included in the Project’s scheduling/phasing plan included in Appendix H.]*

**Example Phase**

|  |  |  |
| --- | --- | --- |
| Activity | Start Date | End Date |
| 1. *Implement material management and waste management BMPs* |  |  |
| 1. *Install Inlet protection* |  |  |
| 1. *Cover stockpiles* |  |  |
| 1. *Install concrete washout* |  |  |
| 1. Begin excavations for utilities |  |  |
| 1. Install utilities |  |  |
| 1. Repave roadway |  |  |

## 3.1.2 Resource Protection

Year-round protection of waterways and sensitive areas is required. The City’s *Storm Water Standards – Part 1* (2018) requires preserving natural hydraulic features and riparian area buffers where possible. Linear protection may be implemented using linear sediment controls such as silt fencing, gravel bag barriers, fiber rolls, and/or compost socks/berms. Linear sediment controls must be installed between the construction area and the sensitive area. However, linear sediment controls must not be installed up and down a slope (i.e., perpendicular to contours), which can cause erosion.

Additionally, BMPs must be implemented when performing demolition adjacent to a water body (such as installing turbidity curtains) and crossing waterways, dry conveyances, or areas where storm water flows.

*[Select at least one BMP from Table 7 if resources, such as water bodies and sensitive areas, are located within or adjacent to the site.]*

Table 7. Resource Protection BMPs

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check at least one BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Linear Sediment Controls** | SE-1, SE-5, SE-6, SE-8 SE-12, SE-13 | SC-01, SC-05, SC-06, SC-08 |  |
| **Preserve Natural Hydraulic Features and Riparian Area Buffers** | - | - |  |
| **Demolition Adjacent to Water** | NS-15 | NS-15 |  |
| **Temporary Stream Crossing** | NS-4 | - |  |
| If no BMPs were selected, provide explanation: | | | |
| Describe any additional resource protection BMPs to be implemented: | | | |
| Describe where resource protection BMPs will be installed: | | | |

# 3.2 Good Site Management “Housekeeping”

BMPs must be installed to control all construction and waste materials. Additionally, construction-related materials, spills, and residues must be prevented from entering the MS4. Good Site Management “Housekeeping” BMPs are provided in **Tables 8–11**. Keep an inventory of construction materials that will be used outdoors and exposed to precipitation, other than those designed for this purpose (e.g., poles, bricks). Designate areas for material loading, unloading, and storage areas. Do not perform activities during a rain event that may contribute to storm water pollution (e.g., loading/unloading) and minimize exposure of construction materials to precipitation.

## 3.2.1 Material Storage and Handling

All material delivery and storage must occur in an area designated for the activity and at least 50 feet away from downstream storm drain facilities. On projects with limited space, material must be stored at least 5 feet away from downstream storm drain facilities. All materials that may contribute pollutants to storm water runoff must be stored off the ground or stored within secondary containment. All materials must be covered at the end of every work day and prior to rain, in accordance with the WTAP implementation schedule applicable to the project. Keeping materials in a storage container (i.e., Conex box) or indoors satisfies the coverage requirement. All hazardous materials and hazardous wastes (a waste with properties that make it potentially dangerous or harmful to human health or the environment) must be stored in watertight containers and labelled in accordance with all local, state, and federal regulations. The storage area for these materials and wastes must be enclosed with watertight secondary containment. Absorbent spill cleanup materials must be readily available onsite in all material storage areas. Apply soil binders, pesticides, herbicides, and fertilizers only were designated without overspray to prevent potential discharge by storm water or non-storm water runoff.

*[Select material storage and handling BMPs from Table 8.]*

Table 8: Material Storage and Handling BMPs

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check Applicable BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Material Storage** | WM-1 | WM-01 |  |
| **Material Handling** | WM-2 | WM-02 |  |
| **Paving and Grinding Operations** | NS-3 | NS-03 |  |
| **Concrete Management** | NS-12, NS- 13, NS-16 | NS-12, NS- 14 |  |
| If no BMPs were selected, provide explanation: | | | |
| Describe any additional material storage and handling BMPs to be implemented: | | | |
| Describe where material storage and handling BMPs will be implemented: | | | |

## 3.2.2 Waste Management

Wastes must be fully managed to prevent discharges to the MS4. Waste management areas must be designated using visible signage. Waste storage areas must be located at least 50 feet from drainage facilities and watercourses and must not be located in areas prone to flooding or ponding per site conditions and the Federal Emergency Management Agency flood map database (https://msc.fema.gov/portal). When infeasible, place waste storage areas as far away as possible from drainage facilities and watercourses. Waste containers are not allowed to leak and must be covered and secured at the end of every day and prior to rain. Waste disposal containers must be inspected for leaks on a weekly basis and must be emptied when they become 95% full. Washdown of waste containers is prohibited onsite.

Littering is prohibited in all areas of the construction project and must be collected at the end of every work day. Loose trash and waste within the project boundary or that originates from the project must be collected daily and disposed of properly. Litter and debris removal from drainage grates, trash areas, and ditches must be performed daily to prevent clogging of storm drainage systems.

Liquid waste management is applicable for all activities that generate any of the following non-hazardous liquid wastes: drilling slurries and fluids; grease and oil-free wastewater and rinse water; dredging; and other non-storm water liquid discharges not permitted by separate permits. Liquid waste discharges as a result of the creation, collection, and disposal of non-hazardous waste is prohibited. Liquid wastes must be contained in a structurally sound and leak-free container and stored in a controlled area with perimeter controls.

Hazardous liquid waste (e.g., used oils, solvents, and paints) and chemicals (e.g., acids, pesticides, additives, and curing compounds) must only be stored in watertight containers in designated hazardous waste storage areas with appropriate labelling, coverage, and watertight secondary containment. The waste storage area must be covered at the end of every work day, and prior to and during rain events. Disposal of these materials must be in accordance with local, state, and federal regulations.

Concrete waste management must occur at every area where concrete or slurries containing Portland cement concrete or asphalt cement is generated, placed, saw cut, cored, grinded, or demolished. Saw cutting slurry shall be vacuumed during the cutting operation and shall not be allowed to sheet-flow more than maximum 12 inches beyond either side of the saw cut line. The vacuum operator shall be within a maximum of five feet of the saw operator to vacuum the slurry. If the slurry was not fully removed from the vacuumed operation, the remainder shall be removed with an appropriate method until no slurry can be dislodged by manual brushing with a wire brush. Slurry/residue must be disposed of properly at the end of each day. Washout from concrete trucks and concrete waste must be collected in a designated concrete washout. Concrete washouts must be watertight and fitted with secondary containment to prevent any concrete waste from being able to discharge on to the ground or offsite. Concrete washout containers must be cleaned or exchanged when containment reaches 75% capacity. Concrete washout containers must be covered securely at the end of every work day. Wash out concrete equipment/trucks offsite or in a contained area located a minimum of 50 feet from storm drain facilities and watercourses. For projects with limited space a distance less than 50 feet but greater than 5 feet may be allowed if additional BMPs are installed downstream of wash out area.

Install containment for portable restrooms and inspect regularly for leaks. Portable restrooms must be located at least 50 feet away from storm drain facilities, watercourses, and traffic circulation. For projects with limited space a distance less than 50 feet but greater than 5 feet may be allowed if additional BMPs are installed downstream of the temporary sanitary facility.

*[Select waste management BMPs from Table 9.]*

Table 9: Waste Management BMPs

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check Applicable BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Solid Waste Management** | WM-5 | WM-05 |  |
| **Liquid Waste Management** | WM-10 | WM-10 |  |
| **Contaminated Soil Management** | WM-7 | WM-07 |  |
| **Sanitary/Septic Waste Management** | WM-9 | WM-09 |  |
| **Concrete Waste Management** | WM-8 | WM-08 |  |
| **Hazardous Waste Management** | WM-6 | WM-06 |  |
| **Stockpile Management** | WM-3 | WM-03 |  |
| If no BMPs were selected, provide explanation: | | | |
| Describe any additional waste management BMPs to be implemented: | | | |
| Describe where waste management BMPs will be implemented: | | | |

## 3.2.3 Vehicle and Equipment Management

Vehicle and equipment management BMPs are implemented if vehicles and equipment will be used, fueled, maintained, and/or parked at the jobsite. Equipment is not permitted to leak. If equipment is found to be leaking it must immediately be repaired or removed. Drip pans must be placed underneath all equipment when not in use to detect leaks. Any visible leaks or accumulation in drip pans or containment must be cleaned daily and before rain. Inspections for equipment leaks must be performed daily by the Contractor. All cleaning, fueling, and maintenance performed onsite must occur in an area designated for the activity which is fitted with appropriate secondary containment and is at least 50 feet away from downstream storm drain facilities. Fueling and maintenance must be performed using drip pans or secondary containment, such as plastic laid out on the ground using a perimeter berm created with gravel bags or fiber rolls under the edge of the plastic. Topping-off of fuel tanks is prohibited. Absorbent spill cleanup materials must be readily available wherever vehicle and equipment cleaning, fueling, and maintenance activities occur. Employees and subcontractors must be trained in proper spill prevention, control, and cleanup procedures. See Spill Prevention and Control BMP for documentation and reporting procedures. Oil, antifreeze, and other fluids shall be drained from inoperable vehicles intended for recycling or long-term outdoor storage. Drained fluids shall be disposed of in accordance with applicable hazardous materials regulations. Do not clean vehicles or equipment onsite using soaps, solvents, degreasers, steam cleaning equipment, etc.

*[Select vehicle and equipment management BMPs from Table 10.]*

Table 10: Vehicle and Equipment Management BMPs

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check Applicable BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Vehicle and Equipment Cleaning** | NS-8 | NS-08 |  |
| **Vehicle and Equipment Fueling** | NS-9 | NS-09 |  |
| **Vehicle and Equipment Maintenance** | NS-10 | NS-10 |  |
| If no BMPs were selected, provide explanation: | | | |
| Describe any additional vehicle and equipment management BMPs to be implemented: | | | |
| Describe where vehicle and equipment management BMPs will be implemented: | | | |

## 3.2.4 Spill Control

Spill prevention and control must occur at every area that uses petroleum products, asphalt, concrete, paints, solvents, soil stabilizers and binders, pesticides, herbicides, fertilizers, detergents, fuels, lubricants, or other products that could harm the environment. All employees and subcontractors must be trained in proper spill prevention, control, and cleanup procedures. Documentation of training must be per the project WPCP and kept at the construction site with the WPCP. Post procedures for storage, clean-up, and spill reporting for hazardous materials and wastes in open, conspicuous, and accessible locations adjacent to storage areas. Ample spill controls materials must be stored onsite.

Spills must be contained and cleaned immediately in accordance with applicable spill control plan, health and safety plan, and safety data sheets. If the spill occurs in dirt areas, immediately contain the spill by constructing an earthen dike. Dig up and properly dispose of contaminated soil according to all local, state, and federal regulations. Spills on asphalt or concrete must be contained and cleaned using adsorbent materials (“kitty litter”).

Remove all spent spill cleanup materials and dispose of according to all local, state, and federal regulations. Notify the City Resident Engineer or City Inspector after the spill is contained; prior to resuming construction activities. Spills must be covered and protected from storm water run-on during rainfall. If the spill occurs during rain, cover the spill with tarps or other material to prevent contaminating runoff. Minor spillage or overflow of potable water must be contained and must not be allowed to discharge into watercourses or drainage facilities.

Any significant release or threatened release of a hazardous material requires immediate reporting by the responsible person to:

* The California Governor’s Office of Emergency Services (Cal OES) State Warning Center at 800-852-7550;
* The San Diego County Hazardous Materials Division at 858-505-6880; and
* Emergency response at 9-1-1.

Significant spills must also be reported to the City’s Solid Waste Local Enforcement Agency within 24 hours at 619-533-3688. Federal regulations require that discharges of oil or petroleum products into or on any waters of the State be reported to the Cal OES State Warning Center at 800-852-7550 and the National Response Center at 800-424-8802 (24 hours). For more information on what is classified as a “significant or threatened release of hazardous material,” visit the CAL OES website at [www.caloes.ca.gov/FireRescueSite/Pages/Spill-Release-Reporting.aspx](http://www.caloes.ca.gov/FireRescueSite/Pages/Spill-Release-Reporting.aspx). Significant spills must be reported to the City Enforcement Agency within 24 hours.

*[Select spill control BMPs from Table 11.]*

Table 11: Spill Control BMPs

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check Applicable BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Spill Prevention and Control** | WM-4 | WM-04 |  |
| **Reporting Significant Spills** | - | - |  |
| If no BMPs were selected, provide explanation: | | | |
| Describe any additional spill control BMPs to be implemented: | | | |
| Describe where spill control BMPs will be implemented: | | | |

# 3.3 Non-Storm Water Management Controls

Illicit discharge and non-storm water discharges are defined as any discharge to the MS4 that is not composed entirely of storm water. The MS4 system includes all conveyances owned by the City designed to collect or convey storm water. Non-storm water discharges must be eliminated or controlled to the maximum extent practicable. Examples of non-storm water include but are not limited to runoff of potable (such as fire hydrant nuisance water) and non-potable water, irrigation runoff, and liquid waste or water from construction activities (such as trench nuisance water) discharging into a storm drain or offsite. See **Section 1.7** for a list of allowable discharges to the City’s MS4. All non-storm water discharges shall be controlled by implementing water conservation practices, implementing good housekeeping techniques, and implementing a program to detect and eliminate illicit discharges. Non-storm water management BMPs are provided in **Table 12**.

The site must be inspected by the Contractor for illicit connections and discharges. If observed, action must be taken as soon as possible to halt the connection/discharge. Illicit discharges to the City’s MS4 must be reported to the City’s Solid Waste Local Enforcement Agency at 619-533-3688 within 24 hours. Water line breaks must be repaired as soon as possible. Ensure that construction-related materials, wastes, spills, or residues are prevented from discharging from the construction site to streets, drainage facilities, receiving waters, or adjacent properties by wind or runoff. Air conditioning condensate discharges shall be controlled to prevent them from reaching storm drains, curbs and gutters, or any other part of the MS4 system.

Potable water discharge testing shall comply with the requirements of Order No. WQ-2014-0194-DWQ. Testing results for chlorine and turbidity must be logged in **Appendix K**. In addition, testing results for pH, chorine, and turbidity (visual estimate) for discharge events that exceed or equal 325,850 gallons per day must be logged in **Appendix K**. In addition, non-storm water discharges (i.e. hydrostatic testing, potable water, etc.) to Areas of Special Biological Significance (ASBS) are prohibited as defined in Order No. R9-2012-0031. Discharges shall be located a sufficient distance from such designated areas to assure maintenance of natural water quality conditions in these areas. If discharging to the sanitary sewer within the ASBS, a Request for Authorization must be submitted to the City Public Utilities Department for review and approval.

Excess water that is drained from an existing water main that results in the comingling of dirt and water as a result from a “cut and plug” or similar operation cannot be discharged directly into a storm drain inlet without proper treatment and/or appropriate construction BMPs. This is a case by case scenario which will need to be approved by the RE. Use **Table 12** below to identify and describe the anticipated means and methods of how to eliminate/prevent the non-storm water discharge during a “cut and plug.”

Dewatering of accumulated, uncontaminated storm water is allowable under the following conditions described in the Dewatering Operations BMP in the City’s *Storm Water Standards – Part 2* (2018):

1. The City must be notified (619-235-1000 or [SWPPP@sandiego.gov](mailto:SWPPP@sandiego.gov)) prior to discharging into the street, gutter, or storm drain. The gutter from the discharge point to the inlet must be swept clean prior to discharge.
2. Water discharging from the site must be clear or field-tested and documented to be less than 20 Nephelometric Turbidity Units (NTU) or demonstrated through a drainage study that the project is not causing and/or contributing to exceedances in the receiving water.
3. Discharges from dewatering operations must be directed through an appropriate pollution prevention or treatment system of control measures, such as a filter bag and sediment trap or sediment basin, prior to being discharged from the construction site.
4. Ensure that dewatering discharges do not cause erosion at the discharge point by implementing the Temporary Energy Dissipation BMP.

Note that the Water Quality Control Plan for the San Diego Region requires that waters be free of changes in turbidity that cause nuisance or adversely affect beneficial uses.

The Water Quality Objective for inland surface waters is 20 NTU. The maximum increase in turbidity for lagoons and estuaries is specified in the Basin Plan and ranges from 10 – 20% over natural turbidity levels. Other Basin Plan requirements may apply.

*[Select non-storm water management BMPs from Table 12.]*

Table 12: Non-Storm Water Management BMPs

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check Applicable BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Illicit Connection/Discharge Detection and Reporting** | NS-6 | NS-06 |  |
| **Potable Water/Irrigation** | NS-7 | NS-07 |  |
| **Vehicle and Equipment/Cleaning** | NS-8 | NS-08 |  |
| **Water Conservation Practice** | NS-1 | NS-01 |  |
| **Dewatering Operations** | NS-2 | NS-02 |  |
| **Cut and Plug or Similar Operation? Yes No**  **If Yes, please describe BMP below in Boxes 2 and 3** | | | |
| If no BMPs were selected, provide explanation: | | | |
| Describe any additional non-storm water management BMPs to be implemented: | | | |
| Describe where non-storm water management BMPs will be implemented: | | | |

# 3.4 Erosion and Sediment Controls

Erosion control, also referred to as soil stabilization, consists of source control measures that are designed to prevent soil particles from being detached and mobilizing in storm water runoff. The goal of sediment control is to capture soil particles which have become detached from disturbed areas by water or wind. See City’s *Storm Water Standards – Part 2 (2018), Chapter 5.* Erosion and sediment controls are provided in **Table 13**.

Group Jobs are generally performed in roadways and the primary soil-disturbing activity is trenching; therefore, these projects have very low erosion potential. Sediment sources are stockpiles, areas where concrete and asphalt have been removed, and areas of disturbed landscaping. Source control of potential pollutant areas must be the focus of BMP implementation. BMPs such as perimeter controls, although required by the City’s *Storm Water Standards – Part 2* (2018), may be infeasible in roadways. Likewise, storm drain inlet protection may cause flooding or ponding hazards. Storm drain inlets that have the potential to receive construction related pollutants must be protected during dry weather. Inlet protection in the public right-of-way for streets open to the public must be temporarily removed prior to a rain event to ensure no flooding occurs and reinstalled after rain is over. Inlet protection for inlets interior to grading activities with the potential for by-pass and flooding must be temporarily removed prior to a rain event to ensure no flooding occurs and reinstalled after rain is over. However, it must be ensured that pollutants from the jobsite will not discharge to the unprotected inlets via good housekeeping (e.g., thorough street sweeping, stockpile control, etc.) and upstream BMPs, such as installing gravel bag check dams in the gutter upstream of the drain inlet to slow the velocity of runoff and pre-filter before reaching the drain.

Sediment control BMPs that require trenching and backfilling (i.e., fiber rolls and silt fence) are not included as optional BMPs in this template, since trenching and backfilling would not be possible in roadways. However, fiber rolls secured with gravel bags may be used in roadways. Gravel bag barriers do not require trenching/backfilling and may be used in roadways as well. Fiber rolls used in roadways may be used only if they are properly secured at 4-ft intervals using gravel bags or an equivalent measure. Gravel bags and fiber rolls must be stacked if necessary to capture the appropriate volume of material or storm water and they must be turned upslope at the ends to ensure runoff does not flow around the BMP.

Perimeter controls must be inspected/maintained daily and as needed. BMPs must be maintained when there is visible damage (e.g., holes, slumping/sagging). Deteriorated BMPs must be removed from the perimeter and managed in accordance with applicable waste requirements. Accumulated sediment must be removed from perimeter controls when sediment reaches 1/3 of the BMP height. Areas where sediment has accumulated to a height of 1-inch or greater must be removed immediately. Sediment near and along gravel bags must be removed at the end of each day and prior to a rain event.

Loose construction and landscaping materials, including stockpiles, must be stabilized and bermed at the end of each work day and prior to rain. Stockpiles must be placed at least 50 feet away from storm drain structures (e.g., inlets, outlets, swales, ditches, etc.). Stockpiles must be placed at least 18 inches from the curb face and are prohibited where they obstruct flow including storm drain inlets and drainage ditches.

Exposed soil areas shall be inspected frequently and if signs of erosion are observed, additional BMPs shall be implemented. Erosion controls must be used in conjunction with sediment controls. Apply erosion controls as soon as grading and/or excavation are completed for any portion of the site, but no longer than 14 days after activity has ceased. At a minimum, erosion control is required on all disturbed areas prior to a 50% probability of precipitation. Projects that are subject to an enhanced WTAP trigger are required to stabilize disturbed areas at a lower probability of precipitation. Schedule and/or phase the project to avoid construction in the wet season and to expose as little soil as possible at any one time. Additional protection is required if work is done within the wet season and prior to a rain event in the dry season.

Sediment tracking must be controlled to comply with performance standards from the City’s *Storm Water Standards – Part 2* (2018). Stabilized construction entrance/exits must be sufficiently implemented at every construction project to control and prevent sediment tracking from the site. Construction entrances/exits must be constructed with a length of 50 feet or as allowable by project site conditions and width of 10 feet or the minimum necessary to accommodate vehicles and constructed per guidance in CASQA or Caltrans Fact Sheet. The entrance/exit(s) must be designed so that vehicles and equipment cannot be driven around the stabilization measures. Sweeping and vacuuming must be implemented daily and as-needed on all paved areas within and adjacent to construction sites. Do not sweep any unknown substance or any object that may be potentially hazardous.

Adjacent roads must be inspected daily when construction is occurring to ensure tracking is not occurring. Observable track-out requires the use of additional BMPs or modification of current BMPs to minimize tracking, including rumble plates, wheel wash, redirecting traffic, or suspending traffic until condition improve. Tracking must be cleaned until there are no areas with sediment that may be dislodged by brushing by hand.

All stockpiles must be stabilized at the end of each day. In addition, all stockpiles must be bermed (i.e. perimeter controls) at the end of each day. Stockpiles in the right-of-way must be stabilized with an erosion control product and bermed (i.e. perimeter control) at the end of each day. All stockpiles must be stabilized with an erosion control product and bermed (i.e. perimeter control) prior to rain. Projects that are subject to an enhanced WTAP trigger are required to stabilize and berm all stockpiles at a lower probability of precipitation. For stockpiles where only a portion (or “face”) is actively being used, the remaining inactive portion (or faces) must be designated on the site map and stabilized with an erosion control product and bermed at all times. Active faces must be bermed (i.e. perimeter control) and stabilized at the end of each day.

*[Select from the erosion and sediment control BMPs from Table 13].*

Table 13: Erosion and Sediment Control BMPs

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check Applicable BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Planning and Scheduling** | EC-1 | SS-1 |  |
| **Geotextiles and Mats** | EC-7 | SS-7 |  |
| **Hydraulic Mulch and** **Bonded Fiber Matrix** | EC-3 | SS-3 |  |
| **Soil Binders** | EC-5 | SS-5 |  |
| **Straw and Wood Mulch** | EC-6, EC-8 | SS-6, SS-8 |  |
| **Compost Blankets** | EC-14 | - |  |
| **Soil Preparation/Roughening (not a stand-alone BMP)** | EC-15 | - |  |
| **Gravel Bag Berm** | SE-6 | SC-06 |  |
| **Fiber Rolls or Straw Wattles** | SE-5 | SC-05 |  |
| **Manufactured Linear Sediment Controls** | SE-12 | - |  |
| **Compost Socks and Berms** | SE-13 | - |  |
| **Check Dams** | SE-4 | SC-4 |  |
| **Storm Drain Inlet Protection** | SE-10 | SC-10 |  |
| **Construction Entrance/Exit Stabilization** | TC-1 | TC-01 |  |
| **Stabilized Construction Roadway** | TC-2 | TC-02 |  |
| **Tire Wash** | TC-3 | TC-03 |  |
| **Street Sweeping and Vacuuming** | SE-7 | SC-07 |  |
| **Stockpile Management** | WM-3 | WM-03 |  |
| If no BMPs were selected, provide explanation: | | | |
| Describe any additional erosion and sediment control BMPs to be implemented: | | | |
| Describe where erosion and sediment control BMPs will be implemented/installed: | | | |

# 3.5 Dust Control

Dust control BMPs are implemented to prevent the air deposition of site materials and particulates from site operations. Such particulates can include sediment, nutrients, trash, metals, bacteria, oil/grease, and organics. Dust generated by construction activities shall be controlled and is prohibited from leaving the site. Ensure a water based dust suppressant is available while construction activities are being performed, especially when soil and stockpiled material is being handled. Spray exposed soils with water or soil binder. Ensure construction materials are not discharged through the air. Do not perform activities that may discharge particulates on windy days. Dust control BMPs are provided in **Table 14**.

*[Select particulate and dust control BMPs from Table 14.]*

Table 14: Particulate and Dust Control BMP

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check Applicable BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Wind Erosion Control** | WE-1 | WE-1 |  |
| If no BMPs were selected, provide explanation: | | | |
| Describe any additional particulate and dust control BMPs to be implemented: | | | |
| Describe where particulate and dust control BMPs will be implemented: | | | |

# 3.6 Run-on and Runoff Controls

All run-on, storm water conveyances through the site, and runoff that discharges offsite must be managed to prevent erosive flows. Runoff from the jobsite must be directed away from all disturbed areas. If runoff or dewatering operation discharges are concentrated, the velocity must be controlled using a temporary energy dissipater. Discharge points and discharge flows must be free of pollutants, including sediment.

Run-on to the site should be diverted around the site if possible. Check dams may be used to reduce velocity of concentrated flows, limit erosion in channels, and trap sediment. They can be installed in gutters to reduce sediment loading to storm drain inlets. Dikes, swales, and slope drains can be utilized to safely convey runoff down a slope, direct runoff to a stabilized channel, reduce potential for flooding, or direct runoff to sediment traps/basins. Vegetation, geotextiles, or mats must be used to stabilize swales and dikes. Slope drains and sediment trap/basin outlets require outlet protection to prevent erosion in this area. Swales and dikes shall be monitored for erosion and cleared of debris, silt, and mud after each rain event. If riling greater than 1-inch deep occurs, the swale or dike shall be repaired within 72 hours or before the next forecasted rain event, whichever is sooner. Run-on and site storm water management BMPs are provided in **Table 15**.

*[Select run-on and site storm water management BMPs from Table 15.]*

Table 15: Run-On and Runoff Control BMPs

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check Applicable BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Check Dams** | SE-4 | SC-04 |  |
| **Earth Dikes, Drainage Swales, and Slope Drains** | EC-9, EC-11 | SS-09, SS-11 |  |
| **Temporary Energy Dissipation** | EC-10 | SS-10 |  |
| If no BMPs were selected, provide explanation: | | | |
| Describe any additional run-on and runoff control BMPs to be implemented: | | | |
| Describe where run-on and runoff control BMPs will be implemented/installed: | | | |

# 3.7 Final Stabilization

For a construction project to be considered complete, all of the following conditions must be met:

* + - Final stabilization has been reached by one of the following:
  + Where no vegetation is present prior to construction, the site is returned to its original line and grade and/or compacted to achieve stabilization and the street is to have its final treatment (e.g., AC overlay, slurry seal); or
  + In disturbed areas that were vegetated prior to construction activities, the area disturbed must be re-established to a uniform vegetative cover equivalent to 70 percent coverage of the preconstruction vegetative conditions; or
  + Where preconstruction vegetation covers less than 100 percent of the surface, such as in arid areas, the 70 percent coverage criteria are adjusted as follows: if the preconstruction vegetation covers 50 percent of the ground surface, 70 percent of 50 percent (.70 X .50 = .35) would require 35 percent total uniform surface coverage; or
  + Equivalent stabilization measures have been employed. These measures include, but are not limited to, the use of such BMPs as blankets, reinforced channel liners, soil cement, fiber matrices, geotextiles, or other erosion-resistant soil coverings or treatments.
    - The site will not pose any additional sediment discharge risk than it did prior to the commencement of construction activity.
    - There is no potential for construction-related storm water pollutants to be discharged into site runoff.
    - Construction materials, temporary BMPs, and wastes have been removed from the site.
    - All disturbed areas have been stabilized in accordance with the project’s final stabilization plan as described in **Table 16**.
    - Post-construction BMPs, if required, have been effectively implemented.

Final stabilization BMPs are provided in **Table 16**.

*[Select the final stabilization BMP in Table 16.]*

Table 16: Final Stabilization BMPs

|  |  |  |  |
| --- | --- | --- | --- |
| **Best Management Practices** | **References** | | **Check Applicable BMP** |
| **CASQA BMP** | **Caltrans BMP** |
| **Final Stabilization** | - | - |  |
| Describe final stabilization BMPs: | | | |
| Describe where final stabilization BMPs will be installed: | | | |

# 4.0 Best Management Practice Maintenance and Inspection

Construction is a dynamic operation where changes are expected. Construction site activities can damage BMPs. Storm water BMPs for construction sites are typically temporary measures that require frequent maintenance to maintain effectiveness. BMPs may require relocation, revision and re-installation.

# 4.1 BMP Maintenance

BMP maintenance requirements are listed in **Table 17**. The following subsections describe the inspection program responsibilities and requirements.

Table 17: BMP Maintenance Requirements

| **Best Management Practices** | **Maintenance Requirements** |
| --- | --- |
| **Planning and Scheduling** | Periodically review construction schedule to determine if activities are up to date and disturbed areas during periods of high precipitation potential can be minimized. |
| **Resource Protection** | Not applicable. |
| **Material Storage and Handling** | Store ample supplies of spill cleanup materials onsite. Clean and organize storage areas. Stage materials on pallets and cover when not in use, at the end of every work day, during rain events, and at least 24 hours prior to rain, in accordance with the WTAP implementation schedule. Repair perimeter controls, containment structures, covers, and liners. Spot check materials use throughout the construction period to ensure proper practices are utilized. |
| **Paving and Grinding Operations** | Arrange for regular collection of paving wastes. Inspect storm drains near paving to ensure effective cover. If saw cutting slurry is not fully removed from vacuumed operations, the remainder shall be removed with an appropriate method until no residue is visible. |
| **Landscape Material Management** | Stage materials on pallets and cover when not in use. |
| **Solid Waste Management** | Waste disposal containers must be inspected for leaks on a weekly basis and must be emptied when they become 95% full. Remove deposited solids in containment areas and collection devices. Inspect and repair containment areas and capturing devices on a weekly basis. |
| **Liquid Waste Management** | Arrange for waste collection as necessary. Remove liquid wastes in containment areas and collection devices. Inspect and repair containment areas and capturing devices. Store liquid wastes in a structurally sound and leak-free container and stored in a controlled area with perimeter controls. |
| **Contaminated Soil Management** | Ensure that contaminated soil stored onsite is covered and bermed at all times and does not have the potential to contact storm water or groundwater. |
| **Sanitary/Septic Waste Management** | Coordinate with a local contractor for routine maintenance. Ensure that sanitary/septic facilities are maintained in good working order by a licensed service. |
| **Concrete Waste Management** | Repair concrete washout when damaged. Ensure adequate freeboard prior to rain events. Remove and dispose of hardened concrete as needed. Concrete waste facilities must be cleaned, or new facilities must be constructed and ready for use once facilities are 75% full. Inspect concrete waste facilities for damage (e.g., torn liner, evidence of leaks, signage, etc.) on a weekly basis. Repair all identified damage. |
| **Hazardous Waste Management** | Store all hazardous waste in watertight containers in storage areas with watertight secondary containment. Keep storage areas clean and organized. Store ample spill cleanup supplies onsite. Control storage area perimeter. Repair containment structures, covers, and liners as necessary. |
| **Stockpile Management** | Cover and berm all stockpiles at the end of every day and prior to rain. Replace damaged covers and berms. Inspect perimeter controls for soil stockpiles on a daily basis for sediment accumulation and remove when sediment is accumulated to a 1-inch or greater height. Ensure stockpiled material is within the bermed area. Store ample supplies of cover material and perimeter controls onsite. |
| **Vehicle and Equipment Cleaning** | Store ample spill clean up supplies onsite. Clean up spills and properly dispose of materials. Ensure as little water as possible is used. |
| **Vehicle and Equipment Fueling** | Store ample spill clean up supplies onsite. Clean up spills and properly dispose of materials. Ensure fueling is performed using drip pans or secondary containment. |
| **Vehicle and Equipment Maintenance** | Inspect vehicles and equipment for leaks on a daily basis. Ensure maintenance is performed using drip pans or secondary containment. Drain fluids from inoperable vehicles and equipment. |
| **Spill Prevention and Control** | Ensure that ample supplies of spill cleanup materials are available in work areas and at material staging yards. |
| **Reporting Significant Spills** | Ensure that onsite staff receives spill cleanup and reporting training. Significant spills shall be reported as described in **Section 3.2.4** |
| **Illicit Connection/Discharge Detection and Reporting** | Inspect site and notify owner/operator of illicit connections or discharge incidents immediately. Ensure construction-related materials and wastes are prevented from leaving the construction site. |
| **Potable Water/Irrigation** | Repair broken lines and correct irrigation overspray as soon as possible. |
| **Water Conservation Practices** | Repair water equipment as needed to prevent non-storm water discharges. |
| **Dewatering Operations** | Dewatering must be done in accordance with the *Storm Water Standards – Part 2* (2018). |
| **Geotextiles and Mats** | Replace damaged blankets and mats. Ensure good soil contact. |
| **Hydraulic Mulch and** **Bonded Fiber Matrix** | Reapply if signs of erosion are observed. |
| **Soil Binders** | Reapply if signs of erosion are observed. |
| **Straw and Wood Mulch** | Reapply where soil is exposed. |
| **Compost Blankets** | Reapply where soil is exposed. |
| **Soil Preparation/Roughening** | Repair and restore as applicable. |
| **Wind Erosion Control** | Ensure dust control is applied over exposed soils and in a way that avoids overwatering and oversaturation. |
| **Gravel Bag Berm** | Replace as bags deteriorate. Inspect daily and remove sediment accumulated to 1/3 the bag height. Areas were sediment has accumulated to a height of 1-inch or greater must be removed immediately. Sediment near and along gravel bags must be removed at the end of each day and prior to a rain event. |
| **Fiber Rolls or Straw Wattles** | Replace damaged fiber rolls. Ensure rolls are trenched in and backfilled in pervious areas. Inspect daily and remove sediment accumulated to 1/3 the roll height. Areas where sediment has accumulated to a height of 1-inch or greater must be removed immediately. |
| **Manufactured Linear Sediment Controls** | Inspect daily and maintain in accordance with manufacturer’s recommendations. |
| **Compost Socks and Berms** | Replace damaged socks. Inspect daily and remove sediment accumulated to 1/3 the sock height. Areas where sediment has accumulated to a height of 1-inch or greater must be removed immediately |
| **Storm Drain Inlet Protection** | Inspect and maintain daily and as needed. Repair damaged inlet protection. Remove sediment and debris accumulated to 1/3 the height or depth of the BMP. Areas where sediment has accumulated to a height of 1-inch or greater must be removed immediately. Sediment near and along gravel bags must be removed at the end of each day and prior to a rain event. |
| **Stabilized Construction Entrance/Exit** | Install prior to construction start. Replace gravel when surface voids are visible. Remove post-construction. |
| **Stabilized Construction Roadway** | Install prior to construction start. Apply additional aggregate on gravel roads as-needed. Remove post-construction. |
| **Street Sweeping and Vacuuming** | Implement daily and as-needed. Immediately vacuum concrete slurry from sawcutting. |
| **Run-on Diversion** | Ensure diversions are effective. |
| **Check Dams** | Remove accumulated sediment and debris when it reaches 1/3 the height of the dam. Areas where sediment has accumulated to a height of 1-inch or greater must be removed immediately. Sediment near and along gravel bags must be removed at the end of each day and prior to a rain event. |
| **Dikes, Swales, and Slope Drains** | Monitor for erosion and clear of debris, silt, and mud after each rain event. If rilling greater than 1-inch deep occurs, the swale or dike shall be repaired within 72 hours or before the next forecasted rain even, whichever is sooner. |
| **Temporary Energy Dissipation** | Remove accumulated sediment and debris when observed in protection devices. |

# 4.2 BMP Inspections

Routine inspections are necessary to ensure the integrity and effectiveness of BMPs, and help protect a site from unexpected weather events. Project owners or contractors must perform daily inspections to identify BMPs in need of maintenance. Self-inspections are to be performed by a QCP, as described in **Section 1.3.2**. Upon identifying failures or other maintenance items, repairs or design changes to BMPs must be completed as quickly as feasible.

# 4.3 Weather Triggered Action Plan

All projects that require development of a pollution control plan per **Table 5** and have a land disturbance greater than 5,000 square feet or greater than a 5-foot elevation differential over the entire project area are required to develop a Weather Triggered Action Plan (WTAP). A WTAP is a written document and corresponding site map designed to be used as a planning tool for the QCP to protect areas of exposed soils and materials prior to forecasted rain. The WTAP must be prepared in advance of rain events per the following table to allow for adequate time to implement BMPs. A WTAP template is provided in Appendix D of the City’s *Storm Water Standards - Part 2* (2018). Completed WTAPs shall be kept in **Appendix G** and must be kept onsite and made available for inspection upon request by a representative of the City, SDRWQCB, or the SWRCB.

Table 18. WTAP Implementation Requirements

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Trigger Level** | **Project Applicability** | **WTAP Implementation Trigger [Probability of Precipitation (POP)]1** | **WTAP prepared no later than # hours prior to predicted onset of rain** | **WTAP implementation completed no later than # hours prior to predicted onset of rain** | **Trigger Level Justification and Enforcement Status4** |
| **A** | **All Projects2** | 50% POP | 48 hours | Prior to Rain | Currently compliant based on City Inspection |
| **Enhanced WTAP Trigger per City Inspection Results:** | | | | | |
| **B** | **All Projects2** | 40% POP | 48 hours3 | 24 hours | Escalating Enforcement for non-compliant erosion and sediment control BMPs |

1 BMP deployment and active area stabilization timing is based on National Weather Service probability of precipitation (<http://www.weather.gov/sgx/>); Use project location and hourly forecast. POP shall be checked once per business day during business hours. If there is less than a 50% POP on Friday when the forecast is checked, a WTAP does not need to be prepared for the following Monday (assuming business hours are Mon-Fri). If the POP is greater than 50% on Monday when the forecast is checked, a WTAP shall be prepared.

2 Project that have a land disturbance less than 5,000 square feet and less than a 5-foot elevation differential over the entire project area are exempt from WTAP requirements.

3 Sites must be checked at 24 hours prior to the rain event to ensure the WTAP is consistent with current construction conditions.

4 Trigger Level selected by City RE or City Inspector based on non-compliant site conditions. The project will remain at the assigned Trigger Level until compliance is demonstrated to the satisfaction of the City RE or City Inspector. The City may move a project back to Trigger A, if compliance is demonstrated for three successive inspections by City construction storm water inspectors.

# 4.4 Recordkeeping and Reports

Records for the following items must be retained for a minimum of three years:

* + - Completed self-inspection forms;
    - Completed WTAPs and exhibits;
    - Training documentation (if any);
    - Discharge reports (if any); and
    - WPCP and amendments (if any).

# 5.0 Post-Construction Pollutant Control

Is this project a Priority Development Project as defined by Part 1 of the City’s *Storm Water Standards* (2018)? ❒ Yes ❒ No

If yes, list the Post-Construction Pollutant Control BMPs to be implemented on the project:

*[Describe the post-construction pollutant control BMPs in Table 19.]*

Table 19. Post-Construction Pollutant Controls

|  |  |
| --- | --- |
| **Pollutant Control BMP** | **Location** |
|  |  |
|  |  |
|  |  |

# 6.0 References

California Department of Transportation (Caltrans)

2011 *Storm Water Quality Handbook SWPPP/WPCP Preparation Manual*. June.

California Stormwater Quality Association (CASQA)

2015 *Construction Stormwater BMP Handbook*. January.

City of San Diego

2018 *Storm Water Standards*. Available online at: https://www.sandiego.gov/planning/programs/landdevcode/landdevmanual#SWstandards2018

San Diego Regional Water Quality Control Board (RWQCB)

2015 Order No. R9-2013-0001, *National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region, as amended by Order Nos. R9-2015-0001 and R9-2015-0100*. Available online at: <https://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/2015-1118_AmendedOrder_R9-2013-0001_COMPLETE.pdf>. November 18.

State Water Resources Control Board (SWRCB)

2012 *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Water Quality Order 2009-0009-DWQ as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ*, General Permit No. CAS000002. Available online at: <http://www.swrcb.ca.gov/water_issues/programs/stormwater/constpermits.shtml>. July 17.

State Water Resources Control Board (SWRCB)  
Statewide General NPDES Permit for Drinking Water System Discharges Water Quality Order 2014-0194-DWQ, General Permit No. CAG140001. Available online at: http://www.waterboards.ca.gov/board\_decisions/adopted\_orders/water\_quality/2014/wqo2014\_0194\_dwq.pdf

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# Amendment Log

|  |  |
| --- | --- |
| Project Name |  |

Include references to section of WPCP that has been amended, add additional pages as needed.

| **Amendment No.** | **Date** | **Brief Description of Amendment include section and page number** | **Prepared and Approved By** |
| --- | --- | --- | --- |
|  |  |  | Name:  Title: |
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Appendix C

This WPCP must be certified by the Contractor.

|  |  |  |
| --- | --- | --- |
| **The applicant must print and sign the following certification:** | | |
| *I have read and understand that the City of San Diego has adopted minimum requirements for managing urban runoff, including storm water from construction activities. I certify that the BMPs selected on this form will be implemented to minimize the potentially negative impacts of this project's construction activities on water quality. I further agree to install, monitor, maintain, or revise the selected BMPs to ensure their effectiveness. I also understand that non-compliance with the City’s Storm Water Standards may result in enforcement by the City, including fines, cease and desist orders, or other actions.* | | |
| **Contractor Name:** |  | **Date:** | |
| **Contractor Signature:** |  | | |

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**Self-Inspection Check List**

|  |  |  |
| --- | --- | --- |
| **Project Name:** | | **Date/Time of Inspection:** |
| **Inspector Name:** | | **Disturbed Area:** |
| **Weather (current and forecasted):**  **Note WTAP Implementation Trigger for POP.** | | |
| **Y/N or N/A** | **All items below are required, when applicable.** | |
|  | **Project Planning** | |
|  | Is the WPCP Site Map updated and onsite? | |
|  | Are activities consistent with the Scheduling/Phasing Plan? | |
|  | **Good Housekeeping** | |
|  | Has all waste/litter been properly disposed? | |
|  | Are all waste containers covered and secured at the end of the day? | |
|  | Does inactive equipment have drip pans to collect leaking oil? | |
|  | Are chemicals and hazardous materials stored away from inlets and properly contained? (Includes portable toilets) | |
|  | Are stockpiles properly protected? | |
|  | Are landscape materials and wastes properly contained? | |
|  | Is there no evidence of chemical/fuel/oil spills onsite? | |
|  | Are all concrete wash areas onsite properly managed? | |
|  | **Non-Storm Water Management** | |
|  | Is there no evidence of pumping or illegal connections at any inlets/canyons/curbs? | |
|  | Is there no evidence of sediment discharge at any of the discharge points? | |
|  | **Erosion Controls** | |
|  | Do finished or inactive areas have erosion control BMPs? | |
|  | Are construction support areas stabilized? | |
|  | Is dust control properly implemented? | |
|  | **Sediment Controls** | |
|  | Does the perimeter of the site have adequate sediment controls with no gaps? | |
|  | Are the adjacent streets clean with **no tracking of sediment** from the site? | |
|  | Are linear controls installed along boundaries of interior work areas (e.g., transition from lot to paved road)? | |
|  | Are sediment controls installed along slopes and inactive areas at the intervals required per the Storm Water Standards Manual? | |
|  | Are all onsite storm drain inlets (existing or installed) properly protected? | |
|  | Are temporary basins stabilized? | |
|  | Is the basin maintained with full capacity? | |
|  | Is outlet adequately protected to prevent erosion? | |
|  | Is overflow inlet adequately protected to prevent sediment from entering? | |
|  | **Run-on and Runoff controls** | |
|  | Are dikes, swales, and slope drains in good condition? | |
|  | Are temporary energy dissipation devices in good condition? | |
|  | **Weather Triggered Action Plan** | |
|  | Has a WTAP been prepared if rain is forecasted? | |

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|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Potable Water Discharge Requirements Certification** (Annual Monitoring and Discharge Events ≥ 325,850 gpd) | | | | | | | | |
| All discharge activities related to this project comply with the State Water Quality Control Board (SWQCB) Order No. WQ 2014-0194-DWQ, Statewide NPDES Permit for Drinking Water System Discharges to Waters of the United States (available at http://www.waterboards.ca.gov/board\_decisions/adopted\_ orders/water\_quality/2014/wqo2014\_0194\_dwq.pdf) and as follows: | | | | | | | | |
| Discharged water has been dechlorinated to below **0.1** *(mg/l)* level; | | | | | | ***Is Discharge Within Limits?*** | | **Comment/Action Taken** |
| **Event #** | **Discharge Date** | **Item Tested** | **Duration** | **Description of the Proposed Discharge** | **Method and Test Result** | ***YES*** | ***NO*** |
|  |  | Chlorine |  |  |  |  |  |  |
|  | Turbidity1 |  |  |  |  |  |  |
|  | pH2 |  |  |  |  |  |  |
|  |  | Chlorine |  |  |  |  |  |  |
|  | Turbidity1 |  |  |  |  |  |  |
|  | pH2 |  |  |  |  |  |  |
|  |  | Chlorine |  |  |  |  |  |  |
|  | Turbidity1 |  |  |  |  |  |  |
|  | pH2 |  |  |  |  |  |  |
| **Qualified Personnel Conducting Tests (Print Name):** | | | | | | **SAP No.(s):** | | |
| **\*Signature:** | | | | | | **Project Name:** | | |
| *\* By signing, I hereby certify and affirm under penalty of perjury that all of the statements and conditions for potable discharge events are correct.* | | | | | | | | |
| * + 1. *Visual Assessment 2. Required for superchlorinated discharges events ≥ 325,850 gpd*   1. *, 2. 2* | | | | | | | | |
| Have any thresholds been exceeded? Per WQ-2014-0194-DWQ would this be a reportable discharge that must be reported **within 24 hours** of the event? [Discharger shall report any noncompliance that may endanger health or the environment to the Regional Water Board).] | | | | | | | | |

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