



Construction Stormwater Pollution Prevention Plan

PREPARED FOR:

Greg Helle 1001 Shaw Road Puyallup, WA 98372

PROJECT:

East Town Crossing 2902 E Pioneer Puyallup, WA 98372 2230723.10

PREPARED BY:

Christopher Watt Project Engineer

REVIEWED BY:

Todd C. Sawin, PE, DBIA, LEED AP Principal

DATE:

November 2023

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I hereby state that this Construction Stormwater Pollution Prevention Plan for the East Town Crossing project has been prepared by me or under my supervision and meets the standard of care and expertise that is usual and customary in this community for professional engineers. I understand that the City of Puyallup does not and will not assume liability for the sufficiency, suitability, or performance of drainage facilities prepared by me.

Table of Contents

Sectio	n	Page	
1.0	Introdu	uction1	
2.0	Project Description2		
3.0	Existin	g Site Conditions2	
4.0	Adjace	ent Areas and Drainage2	
5.0	Critica	I Areas	
6.0	Soils		
7.0	Potent	ial Erosion Problems	
8.0	Constr	ruction Stormwater Pollution Prevention Elements	
	8.1	Mark Clearing Limits	
	8.2	Establish Construction Access	
	8.3	Control Flow Rates	
	8.4	Install Sediment Controls	
	8.5	Stabilize Soils	
	8.6	Protect Slopes	
	8.7	Protect Drain Inlets5	
	8.8	Stabilize Channels and Outlets5	
	8.9	Control Pollutants	
		8.9.1 Required BMPs	
	8.10	Control Dewatering7	
	8.11	Maintain BMPs7	
	8.12	Manage the Project7	
9.0	Constr	ruction Sequence and Phasing8	
	9.1	Construction Sequence	
	9.2	Construction Phasing	
10.0	Construction Schedule		
11.0	Financial/Ownership Responsibilities9		
12.0	Certified Erosion and Sediment Control Lead (CESCL)9		



Exhibits

Appendix F

F-1..... TESC Plan F-2..... TESC Notes and Details

Appendix G

Inspection Logs

Appendix H

Best Management Practices (BMPs)

 BMP C103
 High Visibility Fence BMP C105 Stabilized Construction Entrance

 BMP C120
 Temporary and Permanent Seeding

 BMP C121
 Mulching

 BMP C123
 Plastic Covering

 BMP C140
 Dust Control

 BMP C151
 Concrete Handling

 BMP C152
 Sawcutting and Surface Pollution Prevention

 BMP C160
 Certified Erosion and Sediment Control Lead

 BMP C220
 Storm Drain Inlet Protection

 BMP C233
 Silt Fence



1.0 Introduction

In 1972, Congress passed the Federal Water Pollution Control Act (FWPCA), also known as the Clean Water Act (CWA), to restore and maintain the quality of the nation's waterways. The ultimate goal was to make sure that rivers and streams were fishable, swimmable, and drinkable. In 1987, the Water Quality Act (WQA) added provisions to the CWA that allowed the Environmental Protection Agency to govern stormwater discharges from construction sites. The National Pollutant Discharge Elimination System (NPDES) General Permit includes provisions for development of a Stormwater Pollution Prevention Plan (SWPPP) to maximize the potential benefits of pollution prevention and sediment and erosion control measures at construction sites.

The proposed project will disturb more than 1 acre of area, and therefore is required to obtain an NPDES General Permit for Stormwater Associated with Construction Activities.

The 2019 Department of Ecology (DOE) *Stormwater Management Manual for Western Washington (SMMWW)* requires a Construction SWPPP for projects that add or replace more than 2,000 square feet of impervious surfaces. The proposed project will exceed this threshold; therefore, a Construction SWPPP is required.

Development, implementation, and maintenance of the Construction SWPPP will provide the selected General Contractor with the framework for reducing soil erosion and minimizing pollutants in stormwater during construction of the proposed project. The Construction SWPPP will:

- Define the characteristics of the site and the type of construction that will occur.
- Describe the practices that will be implemented to control erosion and the release of pollutants in stormwater.
- Create an implementation schedule to ensure that the practices described in this Construction SWPPP are in fact implemented, and to evaluate the plan's effectiveness in reducing erosion, sediment, and pollutant levels in stormwater discharged from the site.
- Describe the final stabilization/termination design to minimize erosion and prevent stormwater impacts after construction is complete.

This Construction SWPPP:

- Identifies the SWPPP Coordinator with a description of this person's duties.
- Identifies the Stormwater Pollution Prevention Team (SWPP Team) that will assist in implementation of the Construction SWPPP during construction.
- Describes the existing site conditions, including existing land use for the site, the soil types at the site, as well as the location of surface waters that are located on or next to the site.
- Identifies the body or bodies of water that will receive runoff from the construction site, including the ultimate body of water that receives the stormwater.
- Identifies the drainage areas and potential stormwater contaminants.
- Describes the stormwater management controls and various Best Management Practices (BMPs) necessary to reduce erosion, sediment, and pollutants in stormwater discharge.
- Describes the facility monitoring plan and how controls will be coordinated with construction activities.
- Describes the implementation schedule and provisions for amendment of the plan.



2.0 **Project Description**

The East Town Crossing project proposes to develop an approximately 10.93-acre site located on Tax Parcels 0420264021, 0420264053, 0420264054, 0420351066, 0420351030, 0420351029, 0420351026 in the City of Puyallup, Washington. Refer to Appendix A, Exhibit A-1 for the Vicinity Map.

The developed site includes 8 multifamily buildings, 1 property management/clubhouse building, 2 commercial buildings, associated parking, road access, and utilities. Perimeter and island landscaping will be provided as required by the City of Puyallup. The paved areas will drain to the proposed catch basins located the sites proposed local low points. Runoff collected in these catch basins will be conveyed to one of three R-Tanks where stormwater will be detained. Control structures will control the release of stormwater to a downstream 8'x20' Modular Wetland prior to discharging to the enhanced channel that lines the east and north of the site. Stormwater ultimately discharges to the Puyallup River via open channels alongside E Pioneer, running west.

The proposal will follow the stormwater management design criteria outlined in the DOW 2019 *SMMWW*. Control methods during construction include working during the dry season, minimizing the amount of area that is disturbed at any given time, installing a stabilized construction entrance, placing inlet protection at catch basins and culvert entrances, utilizing straw wattles and Baker Tank and filtration assembly designed by Clearwater Services, and utilizing silt fence, if necessary.

Refer to Appendix F, Exhibits F-1 and F-2 for the TESC Plan and TESC Notes and Details respectively.

3.0 Existing Site Conditions

The existing area is approximately 10.93 acres and is currently developed and undeveloped land cover. Within the seven parcels, a network of dirt and gravel access roads connect E Pioneer, Shaw Rd E, and the commercial property to the south. In the southwest parcels, there is an existing residential structure and a vacant residential lot. The majority of the landcover is made up of tall grass, shrubs, and a few trees.

The site contains a detention pond that receives runoff from the commercial property to the south before overflowing into the existing channel lining the east and north of the property. Apart from the detention pond, the site generally slopes from southeast to northwest with sections of the eastern side of the site discharging to the natural channel to the east The large majority of runoff discharges to the northern portion of the channel. A topographical survey of the project was prepared by Abbey Road Group. that shows existing site conditions. See Appendix A, Exhibit A-2 for the Existing Conditions Map.

4.0 Adjacent Areas and Drainage

In existing conditions, the commercial property to the south drains to the detention pond located on the southeastern parcel of the site and discharges to the channel lining the eastern portion of the site. The detention pond will be maintained in Phase 1 of construction, however, will be replaced by an underground detention system in Phase 2.

Shaw Road E to the west contains its own stormwater collection and conveyance system which prevents discharge to the site. However, Pioneer E to the north drains into channels on either side of the road, including the channel on the north end of the project site. Frontage improvements are proposed in this project during phase 2 that will redirect runoff to the downstream connection via an enhanced stream.



Stormwater leaves the site via the channel that runs around the east and north of the site. A culvert collects the water from the channel and directs it northwest under the intersection of E Pioneer and Shaw Road E. A channel then runs across E Pioneer on the roadside of the railroad before it intersects another culvert directing water to the Puyallup River less than a mile away.

5.0 Critical Areas

There are no known critical areas on or near the project site.

6.0 Soils

The National Resources Conservation Service (NRCS) classifies the onsite soils as Briscot Loam in the northern two-thirds of the site and Puyallup fine sandy loam in the lower third of the site. Appendix A, Exhibit A-4 provides the NRCS soil map. Briscot Loam is classified as hydrologic soil group B/D with poorly draining characteristics. Puyallup fine sandy loam is classified as hydrologic soil group A with well-draining characteristics.

In addition to the NRCS information, Krazan & Associates, Inc prepared a geotechnical report for the site. On March 4, 2021, two large-scale pilot infiltration tests were completed. Based on the results presented in the Geotechnical Report, it was determined that the soils at the site contain high silt content and are considered a very low to relatively impermeable layer. Due to this, in opposition of the NRCS report, the entire site is not recommended for any infiltration due to the presence of unfavorable soils.

In relation to construction efforts, original testing by Krazan & Associates, Inc. shows that the underlying soils are unsuitable for supporting traffic loads when wet. It is recommended that a Geotechnical Engineer is present to provide guidance during construction.

See Appendix B, Exhibit B-1 for the Krazan & Associates, Inc. Geotechnical Engineering Report and Appendix B-2 for the Migizi Group Geotechnical Letter.

7.0 Potential Erosion Problems

Based on an investigation by Krazan & Associates, Inc., there are steep slopes located roughly 300 feet to the south and east of the site mapped as moderate to high for shallow landslide susceptibility and moderate for deep susceptibility. However, there are no historic landslides or debris mapped at the nearby slopes. Due to the presence of a developed and partially developed parcel separating the landslide hazard and the site, Krazan & Associates, Inc. believes there is minimum to no risk to the planned development from nearby slopes.

In relation to onsite soil, underlying soul is unsuitable for supporting traffic loads when wet. Appropriate measures should be taken to stabilize soils for construction work before the wet season.

8.0 Construction Stormwater Pollution Prevention Elements

The purpose of this section is to describe how each of the 12 Construction Stormwater Pollution Prevention elements has been addressed and to identify the type and location of BMPs used to satisfy the required element. If an element is not applicable to the project, a reason is provided.

8.1 Mark Clearing Limits

Prior to beginning land-disturbing activities, clearing limits will be marked with high visibility plastic or metal fencing (BMP C103) as shown on the TESC Plan in Appendix F, Exhibit F-1. All



vegetated areas outside the marked clearing limits shall be preserved in existing conditions. Fencing will also be used to protect the existing storm facility.

8.2 Establish Construction Access

A stabilized construction entrance (BMP C105) is proposed at the northeast corner of the site off E Pioneer. If sediment is transported onto the road surface, the road shall be cleaned by shoveling or sweeping prior to washing. Sediment removal by washing alone will not be allowed. If sediment is tacked from the site, the City of Puyallup may require stabilization of internal roads to contain the sediment or require the installation of wheel wash basins.

8.3 Control Flow Rates

Straw wattles shall be provided to prevent erosion and control flow rates leaving the site. The velocity of water leaving the site shall not exceed 3 ft/s if the discharge is to the existing channel. Clearwater Services has designed a Baker Tank and filtration assembly to control the stormwater release rate and quality before its discharge to the channel. Permanent flow control systems must be constructed and functioning prior to constructing hard surfaces.

8.4 Install Sediment Controls

As part of initial construction activities, BMPs will be installed to trap sediment onsite. Inlet Protection (BMP C220) for existing catch basins and proposed catch basins within the project area and in the adjacent streets that may receive runoff shall be implemented. Silt fence (BMP C233) will be placed along all downgradient boundaries of the proposed project limits to prevent sediment laden runoff from leaving the site.

8.5 Stabilize Soils

Exposed areas and soil stockpiles must be stabilized according to the following schedule:

- 1. From April 1 to October 31, all disturbed areas at final grade and all exposed areas that are scheduled to remain unworked for more than 30 days shall be stabilized within 10 days.
- 2. From November 1 to March 31, all exposed soils at final grade shall be stabilized immediately using permanent or temporary measures. Exposed soils with an area greater than 5,000 square feet that are scheduled to remain unworked for more than 24 hours, and exposed areas of less than 5,000 square feet that will remain unworked for more than 7 days shall be stabilized immediately.

All disturbed areas that are not planned to be constructed on within 90 days from time of clearing and grading shall be revegetated with the native vegetation.

8.6 Protect Slopes

The majority of the site has flat slopes of 0-3%. There are small, isolated areas with slopes greater than 3%, however, no slopes over 20% are being disturbed. All exposed soil not covered by buildings, roadway, or sidewalks will be Hydroseeded, and their slopes will be no greater than 2:11.



8.7 Protect Drain Inlets

Storm drain inlets shall be protected so that surface water runoff does not enter the conveyance system without first being filtered. Inlets shall be inspected weekly, at a minimum, and daily during storm events. Storm Drain Inlet Protection (BMP C220) will be provided.

8.8 Stabilize Channels and Outlets

There is an existing channel alongside E Pioneer that will be protected as necessary. Provide stabilization, including armoring material adequate to prevent erosion of outlets, adjacent stream banks, slopes, and downstream reaches at the outlets of all conveyance systems.

8.9 Control Pollutants

All waste materials will be collected and stored in a securely closed metal dumpster. All trash and construction debris from the site will be deposited in the dumpster. The dumpster will be emptied a minimum of once per week, and the trash will be hauled to the local landfill. No construction materials will be buried onsite. All personnel will be instructed regarding the correct procedure for waste disposal. All sanitary waste will be collected from the portable units a minimum of three times per week. Good housekeeping and spill control practices will be followed during construction to minimize stormwater contamination from petroleum products, fertilizers, and concrete.

Table 1 below lists several pollutants that are commonly found on construction sites that have the potential to contaminate storm runoff. These pollutants will be present, mainly in areas of building and pavement construction. The Contractor and the SWPPP/TESC Coordinator will be responsible for identifying areas where these pollutants are being used and monitor runoff coming from these areas. Pollutant sources will be covered with plastic if contaminated runoff is observed from these areas. If contaminated runoff is found in the sediment trap or soils, the Erosion Control Specialist will direct the Contractor to remove the polluted water/soil and dispose of it in an approved area offsite.

Trade Name Material	Chemical/Physical Description ⁽¹⁾	Stormwater Pollutants ⁽¹⁾
Pesticides (insecticides, fungicides, herbicide, rodenticides)	Various colored to colorless liquid, powder, pellets, or grains	Chlorinated hydrocarbons, organophosphates, carbamates, arsenic
Fertilizer	Liquid or solid grains	Nitrogen, phosphorous
Plaster	White granules or powder	Calcium sulphate, calcium carbonate, sulfuric acid
Cleaning solvents	Colorless, blue, or yellow- green liquid	Perchloroethylene, methylene chloride, trichloroethylene, petroleum distillates
Asphalt	Black solid	Oil, petroleum distillates
Concrete	White solid	Limestone, sand
Glue, adhesives	White or yellow liquid	Polymers, epoxies
Paints	Various colored liquid	Metal oxides, Stoddard solvent, talc, calcium carbonate, arsenic
Curing compounds	Creamy white liquid	Naphtha
Wastewater from construction equipment washing	Water	Soil, oil & grease, solids
Wood preservatives	Clear amber or dark brown liquid	Stoddard solvent, petroleum distillates, arsenic, copper, chromium

Table 1 – Potential Construction Site Stormwater Pollutants



Trade Name Material	Chemical/Physical Description ⁽¹⁾	Stormwater Pollutants ⁽¹⁾
Hydraulic oil/fluids	Brown oily petroleum hydrocarbon	Mineral oil
Gasoline	Colorless, pale brown or pink petroleum hydrocarbon	Benzene, ethyl benzene, toluene, xylene, MTBE
Diesel fuel	Clear, blue-green to yellow liquid	Petroleum distillate, oil & grease, naphthalene, xylenes
Kerosene	Pale yellow liquid petroleum hydrocarbon	Coal oil, petroleum distillates
Antifreeze/coolant	Clear green/yellow liquid	Ethylene glycol, propylene glycol, heavy metals (copper, lead, zinc)
Erosion	Solid Particles	Soil, Sediment

⁽¹⁾ Data obtained from MSDS when available

8.9.1 Required BMPs

The following BMPs or equivalent measures are required of all businesses and agencies during concrete pouring and asphalt application at temporary sites:

- Employees must be educated on the pollution hazards of concrete and asphalt application and cutting.
- Loose aggregate chunks and dust must be swept or shoveled and collected (not hosed down a storm drain) for recycling or proper disposal at the end of each workday, especially at work sites such as streets, driveways, parking lots, sidewalks, curbs, and gutters where rain can readily pick up the loose material and carry it to the nearest stormwater conveyance. Small amounts of excess concrete, grout, and mortar can be disposed of in the trash.
- Storm drain covers or similarly effective containment devices must be placed over all nearby drains at the beginning of each day. Shovel or vacuum slurry and remove from the site. All accumulated runoff and solids must be collected and properly disposed at the end of each workday, or more often if necessary.
- Exposed aggregate washing, where the top layer of unhardened concrete is hosed or scraped off to leave a rough finish, must be done with a mechanism for containment and collection of the discarded concrete slurry (such as the storm drain covers mentioned above). The easiest way to contain the washwater will be to direct the washings to a hole in the ground where the water can percolate into the ground and the solids later covered with soil.
- If directed to a drain, a catch basin filter insert must be used to remove the solids. This is especially useful if the activity must proceed on rainy days.
- Cleaning of concrete application and mixing equipment or concrete vehicles on the work site must be done in a designated area where the rinse water is controlled. The rinse water must either be collected for proper disposal or put into a hole in the ground where the water can percolate away, and the solids later covered with soil or recovered and disposed or recycled.

The use of any treatment BMP must not result in the violation of groundwater, surface water, or drinking water quality standards.



8.10 Control Dewatering

Most proposed improvements are above the observed groundwater, with the exception of some utility installment. Should groundwater be encountered during construction, dewatering control measures shall be used to prevent untreated discharge of sediment-laden water. Measures may include vehicle transport offsite for legal disposal in a manner that does not pollute surface waters, or use of a sedimentation bag with outfall to a ditch or swale for small volumes of localized dewatering.

8.11 Maintain BMPs

Temporary and permanent erosion and sediment control BMPs shall be maintained and repaired as needed to assure performance of their intended functions.

Sediment control BMPs such as silt fencing and drain inlet protection shall be inspected weekly or after a runoff-producing event. Temporary erosion and sediment control BMPs will be removed within 30 days after final site stabilization is achieved. The following inspection and maintenance practices will be used to maintain erosion and sediment controls:

- Built-up sediment will be removed from silt fencing when it has reached one-third the height of the fence.
- Silt fences will be inspected for depth of sediment, tears in the fabric, attachment to the fence posts, and to determine that fence posts are firmly in the ground. Accumulated sediment will be removed from behind the fence.
- Temporary and permanent seeding will be inspected for bare spots, washouts, and healthy growth.
- The Contractor Certified Erosion and Sedimentation Control Lead (CESCL) will provide erosion control inspection services and stormwater disposal monitoring through construction. The City Inspector will be notified of daily construction activities and scheduled meetings between the Erosion Control Inspector and the Contractor.

The maintenance inspection report will be made after each inspection. Copies of the report forms to be completed by the SWPPP Coordinator are attached as Appendix G of this Construction SWPPP. Completed forms will be provided to the City Inspector and will also be maintained onsite during the entire construction project. If construction activities or design modifications are made to the site plan that could impact stormwater, or if AHBL determines that the measures are not adequate to prevent erosion and the discharge of sediment from the site (based on turbidity measurements), this Construction SWPPP will be amended appropriately. The amended Construction SWPPP will have a description of the new activities that contribute to the increased pollutant loading and the planned source control activities.

8.12 Manage the Project

The following practices will be required during construction to properly manage activities:

- Comply with seasonal work limitations.
- Inspect, maintain, and repair BMPs.
- Identify a Certified Erosion and Sediment Control Lead (CESCL).



• Maintain the Construction SWPPP onsite at all times, including narrative and plans.

9.0 Construction Sequence and Phasing

9.1 Construction Sequence

The construction sequence is described below:

- 1. Arrange and attend a pre-construction meeting with the City of Puyallup.
- 2. Stake/flag clearing and construction limits.
- 3. Construct all temporary erosion control BMPs according to the TESC plan. Install inlet sediment protection in existing catch basins.
- 4. Install construction entrance.
- 5. Demolish existing site features indicated for removal.
- 6. Maintain erosion control measures in accordance with City of Puyallup standards and manufacturer recommendations.
- 7. Rough grade and fill site. All grading shall be done in conformance with the grading plan.
- 8. Construct storm system and install inlet sediment protection to new basins.
- 9. Install all remaining site utilities and associated infrastructure.
- 10. Apply erosion control mulch and seeding, straw mulch or equal, to areas that will not be brought to final grade or permanently vegetated within 7 days of exposure during the dry season, and 2 days of exposure during the wet season (October 1 April 30).
- 11. Relocate erosion control measures or install new measures so that, as the site conditions change, the erosion and sediment control is always in accordance with the City of Puyallup Construction SWPPP minimum requirements.
- 12. Final grade site and install final surface treatments. Ensure that surface water is positively directed toward proposed storm collection facilities.
- 13. Remove remaining temporary erosion control items once site has been stabilized and upon approval of the City of Puyallup.

9.2 Construction Phasing

Work under this permit will be completed in two phases. Refer to the associated Plans.

10.0 Construction Schedule

Construction is scheduled to begin in XXX and is expected to be completed in XXX. The majority of earth moving activities will be scheduled during the dry season. During construction, measures will be taken to prevent the transportation of sediment from the site to receiving waters. These measures include the use of:

• (BMP C103)



- Stabilized Construction Entrance (BMP C105)
- Temporary and Permanent Seeding (BMP C120)
- Mulching (BMP C121)
- Plastic Covering (BMP C123)
- Dust Control (BMP C140)
- Storm Drain Inlet Protection (BMP C220)
- Silt Fence (BMP C233)

11.0 Financial/Ownership Responsibilities

The contractor is responsible for obtaining performance and maintenance bonds in accordance with City of Puyallup requirements.

12.0 Certified Erosion and Sediment Control Lead (CESCL)

The General Contractor shall be required to provide a CESCL prior to construction. Once this individual is identified, the City Inspector will be notified.

The Contractor will designate their CESCL here:

Name: ______Address: ______ Phone: _____

Fax Number: _____

The CESCL is required to meet DOE certification requirements. The City Inspector will be provided with CESCL information.

The duties of the CESCL include:

- Implement the Construction SWPPP/TESC plan with the aid of the SWPP Team.
- Oversee maintenance practices identified as BMPs in the Construction SWPPP.
- Conduct or provide for inspection and monitoring activities.
- Sample stormwater for turbidity using a turbidity meter.
- Identify other potential pollutant sources and make sure they are added to the plan.
- Identify any deficiencies in the Construction SWPPP and make sure they are corrected.
- Ensure that any changes in construction plans are addressed in the Construction SWPPP.

To aid in the implementation of the Construction SWPPP, the members of the SWPP Team include the following: General Contractor, CESCL, City of Puyallup Inspector, City of Puyallup, the geotechnical engineering consultant, and AHBL.

The General Contractor will ensure that all housekeeping and monitoring procedures are implemented, while the CESCL will ensure the integrity of the structural BMPs. The SWPP Team



will observe construction and erosion control practices and recommend revisions or additions to the Construction SWPPP and drawings.

This analysis is based on data and records either supplied to or obtained by AHBL, Inc. These documents are referenced within the text of the analysis. The analysis has been prepared utilizing procedures and practices within the standard accepted practices of the industry. We conclude that this project, as proposed, will not create any new problems within the existing downstream drainage system. This project will not noticeably aggravate any existing downstream problems due to either water quality or quantity.

AHBL, Inc.

Christopher Watt Project Engineer

CJW/

October 2023

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Appendix F

F-1.....TESC Plan F-2.....TESC Notes and Details



Inspection Logs



Stormwater Pollution Prevention Plan

Inspection and Maintenance Report Form

To be completed every 7 days and within 24 hours of a rainfall event of 0.5 inches or more

Inspector: Date: Inspector's Qualifications:

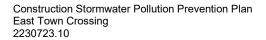
Days since last rainfall: Amount of last rainfall: inches

Stabilization Measures

Drainage Area	Date Since Last Disturbance	Date of Next Disturbance	Stabilized (yes/No)	Stabilized With	Condition

Stabilization required:

To be performed by: _____ On or before: _____





Stormwater Pollution Prevention Plan

Inspection and Maintenance Report Form

Site Entrance:

Date:

Temporary Construction Entrance

Drainage Area Perimeter	Does Rock Pad Adequately Remove Mud from Vehicle Wheels?	ls Rock Pad Clogged with Mud?	Have Quarry Spalls Been Moved to the Roadway?

Maintenance required for temporary construction entrances:

To be performed by:	
---------------------	--

On or before: _____



Stormwater Pollution Prevention Plan

Inspection and Maintenance Report Form

Perimeter Structural Controls:

Date:

Silt Fence

Drainage Area Perimeter	Has Silt Reached 1/3 of Fence Height?	Is Fence Properly Secured?	ls There Evidence of Washout or Overtopping?

Maintenance required for silt fence and straw bales:

To be performed by:	On or before:	



Stormwater Pollution Prevention Plan

Inspection and Maintenance Report Form

Inlet Protection:

Date:

Storm Drain Barriers

Inlet	Has Silt Reached 1/3 of Barrier Height?	ls Barrier Properly Secured?	ls There Evidence of Washout or Overtopping?

Maintenance required for storm drain barriers:

To be performed by:	On or before:	



Stormwater Pollution Prevention Plan

Inspection and Maintenance Report Form

Changes required to the pollution prevention plan:

Reasons for changes:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that gualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____ Date: _____



Appendix H

Best Management Practices (BMPs)

BMP C103	.High Visibility Fence
BMP C105	.Stabilized Construction Entrance
BMP C120	.Temporary and Permanent Seeding
BMP C121	.Mulching
BMP C123	.Plastic Covering
BMP C140	.Dust Control
BMP C151	.Concrete Handling
BMP C152	.Sawcutting and Surface Pollution Prevention
BMP C160	.Certified Erosion and Sediment Control Lead
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