MS4 Self-Assessment

Construction Site Runoff Program

Module 1

Name of the Permittee: City of San Antonio, San Antonio Water System, Texas Department of Transportation	MS4 Permit Number: WQ0004284000 / EPA ID TXS001901
Assessment Period: 2014	

Permittee Instructions: Please complete the worksheet below. Please note that upon opening this Module, some content may be disabled such as the capacity to check inside the "boxes." The contents can usually be activated by pressing "Enable Content" which will appear below the Toolbar in "MS Office."

ATTACHMENTS REQUESTED	Document attached
1. Attach a blank checklist or form used to review SWPPPs.	☑ YES ☐ NO
2. Attach a blank checklist or inspection report form used to inspect construction sites.	☑ YES ☐ NO
3. Attach five copies of completed inspection reports with storm water violations.	☑ YES ☐ NO
4. Attach five copies of enforcement actions issued to address storm water violations.	☑ YES ☐ NO
5. Attach five copies of corrective actions submitted by violators to address a storm water enforcement action requirement.	☑ YES ☐ NO
6. Attach a list of construction sites scheduled for inspections and include the inspection dates. **Inspections are not scheduled unless a follow-up is required per an enforcement issue.** Inspectors are given assigned areas and inspect on average 23 sites a week.	☑ YES ☐ NO
7. Attach an organizational chart.	☑ YES ☐ NO
8. Attach a flow chart to show how the enforcement process is implemented.	☑ YES ☐ NO

CONSTRUCTION SITE RUNOFF **Control Measure to ensure construction owners/operators select and implement appropriate erosion and sediment control measures at their construction sites, to reduce or eliminate the impact to receiving waters.**	
1. In accordance with 40 CFR § 122.26 [Phase I] and 40 CFR § 122.34(a) and 40 CFR § 122.34(b)(4) [Phase II], has the permittee developed a *Storm Water Management Program (SWMP),* that describes how the **Construction Site Runoff** Control Measure will be implemented?	☑ YES ☐ NO
2. What pollutants of concern are targeted for reduction through the **Construction Site Runoff** program?	

Response: Sediment loading	
ORGANIZATIONAL STRUCTURE	
1. Is there a storm water team in place to ensure that the **Construction Site Runoff** program is properly implemented?	☑ YES ☐ NO
2. Describe the organizational structure and staff responsibilities necessary to implement the **Construction Site Runoff** program. Include the name, title, contact information, department name and key responsibilities of each team member.	
Response: Resource Protection & Compliance Department at SAWS is responsible for the implementation of the program. Phil Handley was the Construction Compliance Supervisor that coordinated the inspection process including staff training, Inspection process development, Annual reporting and supervision of the Staff. The Staff time dedicated to this portion of the SWMP is 5 FTE which includes the Supervisor, Environmental Protection Specialist II and administrative support. Andrew Wiatrek is the Section Manager and Scott Halty is the Department Director.	
3. Which co-permittee(s) and or interagency departments will participate in the implementation of the **Construction Site** program?	
Response: SAWS RPC is the primary group. Training is done with other inspection groups to make them aware of the requirements. This allows for other groups to understand the requirements and to report issues as needed for correction.	
4. Describe any formal agreements and key areas of responsibility shared by the permittee, co-permittee(s) and or interagency departments in the implementation of the **Construction Site Runoff** program.	
Response: There is an interlocal agreement between the COSA and SAWS that places this program responsibility with SAWS. TxDOT has their own inspection program. When complaints or issues are reported to or noted by SAWS staff on TxDOT sites contact is made with the appropriate TxDOT Field Engineer.	
5. Do program participants *(e.g., permittee, co-permittee(s), and other departments)* meet regularly to discuss the progress of the program?	☑ YES ☐ NO
6. Describe the frequency of these meetings.	
Response: An annual budget meeting is held with the COSA and SAWS to discuss budget, positions and the overall program. There are other meetings held to discuss items as needed. Things such as changes to the SWMP, responsibilities, permit changes, annual reports and individual issues may cause additional meetings to coordinate as needed.	
LEGAL AUTHORITY	
1. Does the permittee have legal authority to require erosion and sediment control Best Management Practices *(BMPs)*?	☑ YES ☐ NO
2. What ordinances, codes, or policies provide this legal authority?	

Response: Chapter 34, Article VI, Division 5, Subdivision B, Sections 34-801 to 810	
3. Does the legal authority authorize the storm water team to require erosion and sediment control plans?	☑ YES ☐ NO
4. What exemptions do the ordinances or other legal authorities allow?	
Response: None all sites regardless of size are required to provide some type of sediment control to keep a measureable amount of sediment out of the MS4.	
5. Who *(e.g., specific staff, department, etc.)* has the authority to enforce the ordinances and/or inspect the facilities?	
Response: SAWS RPC Staff	

FISCAL RESOURCES

	REPORTING PERIOD BUDGET 2014	NEXT REPORTING PERIOD BUDGET
1. What is the budget for the implementation of the **Construction Site Runoff** program? Illicit Connection Inspection Program includes Const. Storm water and IDDE components under one budget account. These share the budget #s listed.	**Response: $469,258**	**Response $476,872**

SECTION I: MEASURABLE GOALS

1. What are the Measurable Goals for the **Construction Site Runoff** program? Include expected quantifiable results.

Measurable Goal 1	**Number of sites visited**
Expected Quantifiable Results	**Staff are given inspection goals as part of the performance appraisals**
Measurable Goal 2	**Minimize off site tracking from construction sites**
Expected Quantifiable Results	**Reduced repeat issues of offsite tracking from inspected construction sites.**
Measurable Goal 3	
Expected Quantifiable Results	
Measurable Goal 4	
Expected Quantifiable Results	

2. Are these Measurable Goals described in the SWMP?	☑ YES ☐ NO

SECTION II: TRAINING/EDUCATION

STAFF

1. Does the permittee require staff *(e.g., storm water team, inspectors, and engineers)* to complete special, continuous, and or annual training or obtain certification or licensing	☑ YES ☐ NO

to implement and manage the **Construction Site Runoff** program?	
2. If yes, describe the applicable training, certification or licensing and the required frequency for each.	
Response: The EPS 2 position requires levels of training for Storm Water; most of the staff has obtained a CESSWI or a CISEC. In addition they may maintain a TCEQ license for Wastewater Collection Systems. Training is also done in house at weekly staff meetings. Items include permit requirements, inspection processes, webinars, and review of materials.	
3. What kind of information such as brochures or other BMP guidance is used by staff for education and training?	
Response: SAWS performs a TPDES Inspector Training Workshop. Usually done four times a year. Current TCEQ permit requirements and the TCEQ Edwards Aquifer Technical Guidance Manual are reviewed as well.	
4. Is there a system in place to notify staff and inspectors when required training is due, and does it document the training completion dates? Weekly Meetings occur that have discussions regarding components of the inspection process and guidance on proper practices and procedures.	☑ YES ☐ NO
INSPECTORS	
1. Are inspectors trained on how to conduct BMP inspections and routine maintenance?	☑ YES ☐ NO
2. Are inspectors trained on how to photograph a construction site and develop a photo log? **Photo documentation is captured to document non-compliant issues to show contractors areas that are in need of attention.**	☑ YES ☐ NO
3. Are inspectors knowledgeable about storm water BMPs, requirements, and ordinances?	☑ YES ☐ NO
4. Are inspectors familiar with the applicable *Construction Storm Water General Permit*?	☑ YES ☐ NO
5. Do inspectors have written inspection and enforcement procedures to follow during inspections?	☑ YES ☐ NO
CONSTRUCTION OPERATORS	
1. Does the permittee provide training to construction operators about BMPs and how to reduce pollutants in storm water discharges associated with construction activities?	☑ YES ☐ NO
2. What types of training or educational materials are developed and distributed to construction operators/developers and engineers on construction requirements?	
Response: TPDES Inspector Training Workshop, SAWS web site	
3. Does the training cover any of the following?	

• **Local and State erosion and sediment control**	☑ YES ☐ NO	• **Proper erosion and sediment control BMP design and**	☑ YES ☐ NO

requirements and permits.		**installation.**	
• Maintenance requirements for BMPs.	☑ YES ☐ NO	**• General construction storm water permit requirements *(state or federal).***	☑ YES ☐ NO

4. How often is this training conducted? How many operators participated in the training this year?

Response: Usually quarterly but at least three times a year. Specialty classes have also be held for SAWS, COSA, CPS Energy and others as needed.

5. What educational materials did the permittee distribute to construction operators *(e.g., during the review process, inspections)*?

Response: Verbally the staff gives a critic of what they see as compliance issues and makes recommendations. A Field Correction Notice (FCN) is issued giving the operator 48 hours to make corrections. TPDES Inspector Training Workshop information can be distributed or direct the contractors to our website.

6. Is there technical guidance in place such as:	**a. Technical guidance used as a standard for design/selection of nonstructural and structural BMPs.**	☑ YES ☐ NO
	b. Requirements for following technical guidance. <u>The state permit requires permittees follow BMP requirements set forth in the general permit.</u>	☑ YES ☐ NO
	c. Minimum operation and maintenance requirements.	☑ YES ☐ NO
	d. Installation and maintenance requirements	☑ YES ☐ NO
	e. Other, *(Specify)*: <u>TCEQ Edwards Aquifer Technical Guidance Manual</u>	

PUBLIC

1. What communication tools such as a web page or telephone hotline are provided to engage the public in reporting problems about construction sites?

Response: <u>http://www.saws.org/environment/ResourceProtComp/construction/index.cfm</u> the COSA also has a web site "RemembertheRiver.com" and information on the COSA web page in the TCI / Public Works section.

SECTION III: PLAN REVIEW PROCESS

1. Is there a review process in place to review storm water pollution prevention plans *(SWPPP)* and determine potential water quality impacts and ensure that proposed controls are adequate?	☑ YES ☐ NO

2. Are procedures described in the SWMP for reviewing SWPPPs?	☑ YES ☐ NO
3. Are pre-construction meetings held for inspectors and contractors?	☐ YES ☑ NO

4. What activities are involved in the SWPPP review process? *(Check all that apply)* **<u>SAWS reviews SWPPPs in the field after notice is received that construction is ready to commence.</u>**

• Pre-application meetings on construction projects.	☐ YES ☑ NO	**•Determine if projects will disturb greater than 1 acre.**	☑ YES ☐ NO
• Determine that storm water erosion and sediment control requirements are addressed.	☑ YES ☐ NO	**•Determine that erosion and sediment control requirements meet standard conditions.**	☑ YES ☐ NO
• Coordinate with city departments such as smart growth, redevelopment, traffic engineering, etc.	☑ YES ☐ NO	**•Require evidence that the project applicant has submitted an NOI to the State or EPA for storm water permit coverage or already has coverage.**	☑ YES ☐ NO
• Determine that the construction project discharges to a Total Maximum Daily Load impaired water.	☑ YES ☐ NO	**• Determine whether adequate BMPs are included on plans, details, and drawings for the installation of certain BMPs when applicable, what types of standard conditions or notes are included, and whether maintenance requirements are specified.**	☑ YES ☐ NO
• Determine that inadequate or incomplete plans are automatically returned to the applicant.	☑ YES ☐ NO	**• Determine that BMPs addressing other construction activities, such as materials storage and waste disposal, are incorporated into the construction plans.**	☑ YES ☐ NO
• Determine that returns are accompanied by an explanation of what is needed for approval.	☑ YES ☐ NO	**• Determine that the plans include notes addressing the prohibition of non-storm water discharges.**	☑ YES ☐ NO

Other *(Specify)*: SWPPP full reviews are conducted by SAWS Storm water inspectors at the construction sites during the initial inspection to ensure that BMPs are installed according to plan as well as correct documentation has been attained.

5. Which department(s) is responsible for reviewing and approving storm water pollution plans and building permits?	
Response: COSA TCI reviews building permit submittals (construction plans and drainage reports) to confirm that runoff from development will not have an adverse impact to downstream properties and structures. SAWS performs a field check on the SWP3 to ensure that what is on the plans is in the field and that they are working correctly. Any deficiencies are noted and addressed in the field inspection.	
SECTION IV: INVENTORY	
1. Has the permittee identified its universe of construction sites (*including sites disturbing less than 1 acre*)?	☑ YES ☐ NO
SECTION V: EQUIPMENT	
1. What fundamental and special hardware *(e.g., vehicles, laptops, special metric instruments)* is used in the field for this program?	
Response: Staff has 4x4 trucks to access sites. A UTV is available if needed for special circumstances. Staff has laptops with aircards, camera and GPS equipment is available if needed.	
2. What computer software is used to plan and prioritize inspections and activities; perform calculations or analyses for the **Construction Site Runoff** program?	
Response: CCAPP program, web-based application with inspection page for staff to enter inspections and track developments.	
SECTION VI: INSPECTIONS	
1. How many fulltime inspectors or other personnel are assigned to inspect construction sites? Also, describe the extent to which other departments may be involved in conducting these inspections.	
Response: Construction Compliance Supervisor/Manager and 5 EPS2 positions are dedicated to the program.	
2. Are there an adequate number of inspectors to conduct storm water compliance inspections and undertake other storm water management responsibilities?	☑ YES ☐ NO
3. Is there criteria developed for prioritizing inspections?	☑ YES ☐ NO
4. Describe the criteria for prioritizing inspections.	
Response: Staff visits new sites first to conduct complete SWPPP inspections and sites that have had non-compliance issues in the past are prioritized as well as geographic location related to areas with high probability of runoff.	
5. How many construction sites are active and scheduled for inspection during the reporting period?	
Response: 818 current active sites.	
6. What percentage of the construction sites are inspected?	

Response: 100% of active sites are inspected once we are notified that construction commenced. Current listing of unique Development sites inspected is 840 (this included sites that have gone inactive).		
7. Do Inspectors use a checklist or inspection report to document inspection findings and violations? *(If yes, attach a copy of the checklist or inspection report)*		☑ YES ☐ NO
8. Do Inspectors walk the entire site and identify all potential and actual storm water problems?		☑ YES ☐ NO
9. Are inspections conducted in phases?		☐ YES ☑ NO
10. What phases are inspected? *(Check all that applies)* : Construction sites are inspected not based on Phases. Inspections are un-scheduled and not based upon any particular phase of construction.	**a. Clearing**	☑ YES ☐ NO
	b. Grubbing	☑ YES ☐ NO
	c. Site Preparation	☑ YES ☐ NO
	d. Mass Grading	☑ YES ☐ NO
	e. Public Infrastructure	☑ YES ☐ NO
	f. Utility	☑ YES ☐ NO
	g. Building Construction	☑ YES ☐ NO
	h. Final Grading	☑ YES ☐ NO
11. How many days are granted for construction operators/developers to correct violations, prior to the issuance of an enforcement action?		
Response: When a FCN is issued the operator has 48 hours to make corrections. The EPS is given the latitude to give extensions based upon his field visit.		
12. What kind of report is generated as a result of the inspections?		
Response: An inspection report and/or corrective action letter can be generated if necessary to achieve compliance.		
13. Do these reports detail all problems found at the site or do they document only that an inspection occurred?		☑ YES ☐ NO
14. What do inspectors look for when conducting construction site inspections? *(Check all that apply)*:		
• Verification that storm water permit coverage has been applied for or a storm water permit has been obtained.		☑ YES ☐ NO
• Verification that an approved SWPPP is available at the construction site for review.		☑ YES ☐ NO
• Inspect to determine that BMPs are adequately maintained.		☑ YES ☐ NO

• **Problems with containing potential storm water contaminants.**	☑ YES ☐ NO
• **Problems with materials exposed to storm water such as batteries, chemicals, grease and oils.**	☑ YES ☐ NO
• **Problems with spills and leaks left unattended.**	☑ YES ☐ NO
• **Problems with long term storage of oil scrap equipment and other materials.**	☑ YES ☐ NO
• **Problems with trash and other debris.**	☑ YES ☐ NO
• **Check flow pathways and discharges from the site at outfalls or to storm drain inlets.**	☑ YES ☐ NO
• **Unauthorized discharges of facility wash water *(vehicle or yard)* to the street/storm drain.**	☑ YES ☐ NO
• **Unauthorized discharges of sediment to the street/storm drain.**	☑ YES ☐ NO
• **Performance integrity of BMPs and that both structural and source control BMPs function properly.**	☑ YES ☐ NO
• **Other, (*Specify*):**	
SECTION VII: ENFORCEMENT	
1. Is an enforcement policy in place that clearly describes the *action (e.g. verbal and written warnings, fines, and "stop work" orders)* to be taken for common violations?	☑ YES ☐ NO
2. Is there an enforcement escalation procedure for violations?	☑ YES ☐ NO
3. Are inspectors authorized to administer enforcement actions for permit non-compliance onsite (cease and desist orders, fines)?	☑ YES ☐ NO
4. Has the permittee issued any escalated enforcement actions? If yes, how many actions?	☑ YES ☐ NO
Response: In 2014 there were 128 sites that received a FCN and 6 Stop Work orders were issued.	
5. Are there limitations of enforcement authority *(e.g., limits on the dollar amount of fines, inability to issue civil penalties)*?	☑ YES ☐ NO
6. Is enforcement authority adequate to achieve compliance on construction projects?	☑ YES ☐ NO
7. Do Inspectors conduct follow-up inspections or phone calls following the issuance of an enforcement action, to determine compliance? Follow-Up Inspections	☑ YES ☐ NO
SECTION VIII: RECORDS MANAGEMENT	
1. Does the permittee have a database in place to track the activities of the **Construction Site Runoff** program?	☑ YES ☐ NO

2. What information (e.g., Notices of Intents, inspections, results, follow-up, enforcement actions, citizen complaints) is tracked in the database for the **Construction Site Runoff** program?	
Response: Attached is a PDF of the <u>development entry page</u> from our CCAPPS database.	
3. Who has access to this database?	
Response: SAWS RPC Staff	
4. Who is responsible for updating the database?	
Response: SAWS RPC Staff	
5. Does the permittee update its SWMP to reflect current change and progress made in the **Construction Site Runoff** program?	☑ YES ☐ NO
SECTION IX: ASSESSMENT	
1. Does the permittee assess the effectiveness of the **Construction Site Runoff** program?	☑ YES ☐ NO
2. Based on the results of the effectiveness assessment, describe the positive results of the **Construction Site Runoff** program.	
Response: Assessment is conducted through a review of the annual report and trends that are occurring within the construction community. Positive results are discussed with staff to determine if adequate levels of compliance are being achieved with in those areas.	
3. Based on the results of the effectiveness assessment, what changes are proposed to enhance the **Construction Site Runoff** program?	
Response: Areas that show an escalated area of non-compliance (i.e. concrete wash out pits, off site tracking) are discussed with staff and made a priority for evaluations to try and increase compliance in those areas for the next year cycle.	
4. Does the permittee have adequate staff and equipment to implement the **Construction Site Runoff** program?	☑ YES ☐ NO
5. Does the permittee assess the **Construction Site Runoff** program to determine if it meets Measurable Goals and other indicators?	☑ YES ☐ NO
6. Does the permittee assess the **Construction Site Runoff** program's compliance with the permit requirements?	☑ YES ☐ NO
7. Does the permittee generate an assessment report of the **Construction Site Runoff** program for its records?	☑ YES ☐ NO
8. What departments are involved in the **Construction Site Runoff** program assessment?	
Response: SAWS RPC staff generates an Annual Report Summary for the COSA that includes a report of all the sites visited, all the FCN and SWO issued, and all NOIs and NOTs received.	
Completed by (Print Name): Andrew Wiatrek	

Signature:	Date: 8-12-2015	
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