

# [ SITE INSPECTION ]

## defining 'qualified'

### Training knowledgeable and confident storm water inspectors

*By Shirley D. Morrow, CPESC, CISEC*

**T**he U.S. Environmental Protection Agency (EPA) and state-authorized National Pollutant Discharge Elimination System (NPDES) programs' construction general permits (CGPs) require inspections be conducted of storm water pollution prevention plans (SWPPPs) and site best management practices (BMPs) on a regularly scheduled basis throughout a construction project until its

construction NPDES permit has been terminated.

These inspections must be conducted by "qualified personnel." The permits, for the most part, define qualified personnel as people knowledgeable in the principles and practice of erosion and sediment control who also possess the skills to assess conditions at a construction site that could impact storm water quality. The permits call for these





*Assessing site conditions for full CGP compliance is a key qualification for storm water inspectors.*

individuals to assess the effectiveness of any sediment and erosion control measures selected to control the quality of storm water discharges from construction activity. It is required that an inspector's qualifications be noted on each inspection report.

### All-Encompassing Training

So how do you know whether you meet these qualifications? How do you get qualified?

Over the last few years, more states have begun requiring state-sponsored or mandated training programs for persons doing construction; this way, people can prove they are qualified to conduct construction site inspections. Going through a training program that provides an exam and certification will provide an individual the credentials of a qualified inspector. But are these people learning what they need to do a proper storm water compliance inspection?

Training and education about erosion and sediment control and how

to perform construction site inspections has focused on construction site BMPs. But shouldn't the inspection focus on total compliance with the CGP? What does that involve?

Let's look at the Expedited Settlement Offer Worksheet used by the EPA when assessing monetary penalties for noncompliance with the CGP. Staff members look at approximately 38 issues with the information provided in the SWPPP and 44 issues with the BMPs, SWPPP updates and inspections during construction. Almost half of the issues one could be out of compliance with are things in the SWPPP preparation—even before it is implemented at the construction site.

When training construction site storm water inspectors, the industry needs to train for full CGP compliance, which entails training for SWPPP compliance as well as site BMP compliance. Our industry has focused inspection training on making sure the silt fence is functioning, checking that

soil stabilization such as vegetation is growing and determining whether sediment capture needs to be cleaned out of sediment control devices.

We need to train the inspectors to review the SWPPP and the construction site for all aspects of compliance. The inspection should include the SWPPP paperwork, for instance making sure a copy of the CGP and notice of intent are included. The SWPPP and site maps should be inspected to make sure all ground-disturbing activity is recorded to date and all good housekeeping elements (i.e., portable toilets and trash dumpsters) are located accurately.

At a minimum, the inspection form should have space to record the following items for inspection:

- SWPPP paperwork;
- Site maps;
- Public posting signs;
- Erosion control devices;
- Sediment control devices; and
- Pollution prevention and good housekeeping devices.



The inspection form should also have space for all required information such as the inspector's qualifications, weather information and not only a record of deficiencies found, but also a place to record when those deficiencies were repaired.

Inspectors need to know how to maintain each device, plus its proper use, installation and purpose. The storm water and erosion and sediment control industries are fast-paced, and there are new products available all the time. An inspector needs to be able to access the latest and greatest information on products, research, regulations and the like to do a good job maintaining compliance on a construction site.

### Online Options

Inspector training also needs to be taught at a level even someone new to the industry can understand; it needs to be easily accessible and available at any time. Computer-based online training allows everyone access to the

material at a time and place convenient for them. It also saves the time, money and natural resources needed if one was to fly or drive to a training class.

StormwaterUSA, for example, provides online training 24/7 for construction site inspectors. The training provides information on all aspects of storm water CGP compliance for the SWPPP as well as construction site BMPs. Participants can re-enter training modules at any time for a refresher or update on the latest news and products. An online library offers state and federal permits, forms and reference materials. The EPA has reviewed the curriculum of the modules and provided comments on the federal CGP module, and the online Certified Compliance Inspector of Stormwater meets EPA requirements for consent order-mandated training.

With convenient and easily accessible training, more people can become trained. If more people are trained and doing the

right thing, it makes for a win-win situation. The industry will have more knowledgeable and confident inspectors, making for a healthier environment with cleaner water.

People will do the right thing as long as they know and understand what the right thing to do is. Online training provides a working solution to the problem. **SWS**

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