

10 Steps to Implementing and Maintaining an Environmental Compliance Stormwater Program

- 1. **Know the rules & regulations** for your City, County, State and Federal. Be aware that different soil types can affect stormwater in different ways, and there are different limitations on what is an acceptable concentration of sediment, heavy metals or other contaminants for different bodies of water. Many State rules and limitations are stricter than the Federal regulations.
- 2. Review your site and document findings, both good and bad so you can correct and prevent any potential issues. Walk your site to create and manage an inspection checklist for review or potential submission to State or Federal agencies. Evaluate neighboring sites where they are adjacent to yours, to determine if they will add to issues on your site from stormwater runoff or other contamination means.
- 3. **Create your SWPPP** (Storm Water Pollution Prevention Plan) and submit your NOI (Notice of Intent) to the permitting authorities. Manage your SWPPP, updating any changes, issues, and tracking inspection reports. You should also have included all emergency response documents such as what is the procedure if there is a spill or what to do in the case of a BMP failing, etc.
- 4. Meet with your team and anyone onsite to make they are aware of the SWPPP BMPs and set your expectations. Anyone onsite could see issues and report them to reduce potential larger leaks or contamination. Discuss non-compliance and ramifications, so everyone is aware and can respond accordingly. Simplify as much as possible to make it easy for everyone to comply and assist with compliance.
- 5. **Review your procedures and BMPs** to see if there is a better or easier way to be in compliance. Look for simpler or more effective BMPs and be sure to update your SWPPP upon implementation to keep your records up to date.
- 6. Be sure to **follow any sampling of stormwater runoff** as required by your County, State or Federal agencies.
- 7. **Maintain good housekeeping and preventative measures.** Make sure you have sufficient secondary containment in case of a leak, spill kits in case of a spill and maintain BMPs, as well as clean up any debris to prevent potential issues.
- 8. **Keep all of your potential contaminants on your own site** and minimize any runoff to any adjacent properties or storm drains. In the case of a construction site, be sure to stabilize the site as you go as it will be easier to maintain.
- 9. **Maintain records** and take pictures if possible to show issues and resolutions. It is better to have too much documentation rather than not enough in case of an audit or incident.
- 10. If you are on a construction site and have finished the job, file your NOT (Notice of Termination), tidy up and leave the site being sure to remove all temporary BMPs and debris that needs to be disposed of. If not, be sure to constantly maintain your SWPPP and file any annual or quarterly reports necessary for compliance.

That is this month's Stormwater Minute!

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