

CON APPENDIX F
USAG-HI Corrective Procedures for Construction Storm Water
Inspections

REQUIREMENT

In accordance with the US Army Garrison, Hawaii (USAG-HI) Municipal Separate Storm Sewer System (MS4) Permit Number HI S000090 effective April 7, 2014, Part D.1.d.(5)(iv), USAG-HI is required to submit reporting and corrective procedures for construction site inspections. This document establishes construction site inspection, corrective actions, tracking and reporting procedures to ensure compliance with the MS4 permit requirements.

DEFINITIONS

The terms minor, major and critical when relating to deficiencies in this document are defined as the following:

Critical Deficiency: A deficiency that poses an immediate risk of discharge of pollutants to a storm drain MS4 system, surface waters or State waters. Critical deficiencies include, but are not limited to, the following examples:

- Any evidence or observed discharge of non-storm water to the storm drain system, surface waters, or State waters generated by construction activity
- No SWPPP document or NPDES permit
- Absence of perimeter controls and/or linear barriers required by the SWPPP document
- There are identified storm drain inlets, surface waters, or State waters within or adjacent to the project site in close proximity to disturbed soil areas without control measures in place that pose an immediate threat of untreated storm water discharges;
- Work in an active stream channel or other surface water body without proper implementation of required BMPs; and
- Any presence of any spilled oil or hazardous materials near to unprotected storm drain inlets, surface waters, or State waters

Major Deficiency: A deficiency that is a significant issue that could result in the discharge of pollutants to the storm drain system, surface waters or State waters. Major deficiencies include, but are not limited to, the following examples:

- Linear barriers and/or perimeter controls in areas tributary to a water body or drain inlet that are installed as required by the SWPPP document, but are not functional, such as silt fences that are not anchored properly, have collapsed, or are overwhelmed by accumulated sediment;
- Hazardous materials or waste stored within a project without containment or implementation of BMPs;
- Any fluid spills covering more than one square yard and/or are adjacent to protected storm drain inlets, surface waters, or State waters;
- Sediment tracking more than 50 feet from project entrance/exit location(s);
- Expansion of the active disturbed soil area limit without written approval

- Soil stabilization and sediment controls are not installed in accordance with the current SWPPP document/ BMP site map;
- Sediment controls are installed in accordance with the SWPPP document, but there is a large unstabilized disturbed soil area with insufficient controls down gradient to prevent the discharge of untreated storm water to the storm drain system, surface waters, or State waters if a rain event generates runoff; and
- Dust from project site visibly blowing off the site and into storm drain conveyances or adjacent surface water bodies.

Minor Deficiency: A deficiency that does not pose a threat of discharge of untreated storm water or pollutants to the storm drain system, surface waters, or State waters, but are not in direct conformance with the SWPPP document. Minor deficiencies include, but are not limited to, the following examples:

- BMPs are not deficient, but are not consistent with the SWPPP plan;
- SWPPP does not reflect current operations and an amendment is recommended;
- Linear barriers and/ or perimeter controls are properly installed according to the SWPPP document, but require minor maintenance
- Sediment controls are installed per the SWPPP plan, but not properly maintained;
- Site inspections by project staff are not being conducted at the required frequencies;
- Non-storm water or waste management BMPs that are improperly maintained;
- Any fluid spills covering less than one square yard and not adjacent to storm drain inlets, surface waters, or State waters;
- Evidence of active wind erosion on unstabilized slopes/stock piles;
- Minor tracking less than 50 feet from project entry/exit locations and
- Major deficiencies which are corrected prior to the inspector leaving the site

PROCEDURES

Permit Citation	Permit Requirement	DPW Environmental Procedure
Part D.1.d(4)	Plan review and approval	DPW Environmental will review all project SWPPP's and supporting documents. DPW Environmental will verify that all documents meet HAR, Chapter 11-55, Appendix C, section 7 and approved BMP manual requirements by using an approved SWPPP document checklist. Comments and notes will be made to the document preparer if any SWPPP elements are omitted or any portion is believed insufficient. Deficiencies will be noted with the date comments were addressed by the document preparer to the satisfaction of DPW Environmental.
Part D.1.d(5)i	Inspections	<p>Prior to the start of any ground-disturbing activities, except for activities associated with the installation of BMPs at a site, the qualified DPW Environmental inspector will inspect the site to verify BMPs have been properly installed to the SWPPP specifications. The inspector will document any site conditions having the potential for erosion and sediment runoff as a result of the project's construction activities.</p> <p>A spreadsheet will be used to verify all comments made by DPW Environmental during the review process have been properly resolved.</p>
Part D.1.d(5)ii,	Inspection frequency	<p>All contract, in-house and maintenance construction projects greater than one acre will be inspected at least monthly by an independent qualified DPW Environmental construction inspector(s), who is familiar with the project SWPPP. Initial inspections will verify BMPs have been properly installed prior to the start of earth disturbing activities.</p> <p>The inspector(s) will use the attached "Construction Oversight Field Inspection Checklist" that will document any BMP deficiencies and inconsistencies between the approved SWPPP and project site conditions. The inspection form will include the date, inspection observations with photographs, potential noncompliance issue(s) and any necessary corrective actions needed to be addressed. Inspection forms will be sent (via email) to the construction contractor and the United States Army Corps of Engineers (USACE) project manager(s) within 48 hours of the inspection (working business days). A photographic log will be kept to document all minor, major and critical issues observed on site. A response (via email) from the contracting project manager to DPW Environmental verifying (with photographs, maps.ect) appropriate corrective action was taken to address the identified deficiencies is expected within 5 calendar days</p>

		<p>of receiving the inspection form. DPW Environmental will track all inspections using an internal public share drive.</p> <p>Upon three successive monthly site inspections that indicate, in total, no critical or major project BMP and storm water control deficiencies or less than six minor deficiencies with no more than three minor deficiencies in one month, DPW Environmental may decrease inspection frequency to quarterly per the permit. This will be at the discretion of the DPW Environmental qualified inspector(s). However, If under quarterly inspection frequency, a critical deficiency is observed or three (3) or more minor deficiencies are detected, inspection frequency shall return to no less than monthly. All reporting and tracking procedures will be kept consistent using the DPW Environmental internal share drive.</p>
<p>Part D.1.d(5).ii</p>	<p>Corrective actions and reporting</p>	<p>If any critical deficiencies are observed DPW Environmental will immediately notify DOH verbally and in writing. DPW Environmental will verbally notify the responsible construction contractor and ensure all critical deficiencies are addressed and adequately corrected before the close of business day on the day the deficiency is identified.</p> <p>In the event a major deficiency is detected, DPW Environmental will immediately send a written notification with an attached inspection checklist containing photographs to the responsible construction contractor and USACE project manager(s) explaining the site nonconformities. DPW Environmental will ensure all major deficiencies are addressed or corrected as soon as possible, but in no event later than five calendar days after the deficiency is identified or before the next forecasted rain event, whichever is sooner.</p> <p>In the event a minor deficiency is detected, DPW Environmental will document the issue using the approved inspection checklist, photograph log and internal project tracking system. The responsible construction contractor and USACE project manager(s) will be notified verbally of any non conformities at the end of the inspection and provided an emailed copy of the inspection form (with attached photographs) within 48 hours of the inspection (normal business days). A response from the contractor documenting the corrective action taken to address the identified issues is expected within 5 calendar days from receiving the completed inspection form.</p> <p>Per the permit, the DPW Environmental qualified construction inspector(s) will conduct follow-up inspections as needed, at least monthly to ensure site deficiencies have been properly addressed and all storm water controls are in proper working order. Inspections will also be conducted upon complaints from citizens or concerned</p>

		<p>groups. Unannounced and follow-up inspections will be conducted as necessary.</p> <p>For all projects, if the corrective measures are not completed, then the deficiency will be elevated to the DPW Director. A written correspondence will be sent to the USACE Chief of Construction and Regional Project Managers, or to the principal executive officer within Lend Lease/Island Palm Community requesting a timeline and resolution</p>
	Record keeping	<p>Electronic inspection reports, spreadsheets and supporting photographic logs will be kept on file with the DPW Environmental Division. Records shall be kept for five (5) years in accordance with the NPDES permit.</p>