



# ***UA LITTLE ROCK***



# **UA LITTLE ROCK**

## **Stormwater Management Program**

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## **CONTACT INFORMATION**

<b>Information Desired</b>	<b>Contact</b>	<b>Department</b>	<b>Phone #</b>	<b>Email/Website</b>
To report any suspected water pollution activity	Operations Center	Facilities Management	569-3390	<a href="http://ualr.edu/facilities/">http://ualr.edu/facilities/</a>
For information or questions regarding UA Little Rock stormwater programs	Vince Rodgers	Environmental Health and Safety	371-7602	<a href="mailto:varodgers@ualr.edu">varodgers@ualr.edu</a>
UA Little Rock Stormwater Website	---	Environmental Health and Safety	---	<a href="http://ualr.edu/facilities/index.php/home/environmental-health-safety/116/">http://ualr.edu/facilities/index.php/home/environmental-health-safety/116/</a>
Program Events Participation	Vince Rodgers	Environmental Health and Safety	371-7602	<a href="mailto:varodgers@ualr.edu">varodgers@ualr.edu</a>
Illegal Dumping Reporting	Dispatch	Dept. of Public Safety	569-3400	<a href="http://ualr.edu/safety/">http://ualr.edu/safety/</a>
State Requirements	ADEQ-Stormwater	Water Division-MS4 Permits	682-0923	<a href="http://www.adeg.state.ar.us/water/branch_permits/general_permits/stormwater/default.htm">http://www.adeg.state.ar.us/water/branch_permits/general_permits/stormwater/default.htm</a>
Federal Requirements	EPA-Region 6	NPDES Stormwater Programs	800-887-6063	<a href="https://www.epa.gov/aboutepa/epa-region-6-south-central">https://www.epa.gov/aboutepa/epa-region-6-south-central</a>

## **INTRODUCTION**

The purpose of this Stormwater Management Program (SWMP) is to comply with the Arkansas Department of Environmental Quality (ADEQ) General Permit ARR040000 pursuant to Environmental Protection Agency (EPA) code 40 CFR 122.32. In accordance with the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended, Ark. Code Ann. 8-4-101 et seq.), and the Clean Water Act (33 U.S.C. 1251 et seq.), the discharge of stormwater from the Municipal Separate Storm Sewer System (MS4) at the University of Arkansas at Little Rock is authorized. UA Little Rock holds MS4 Individual Permit ARR040020 where ADEQ grants UA Little Rock the authority to discharge stormwater runoff under the terms and conditions specified in ARR040000. UA Little Rock has completed a Notice of Intent (NOI) and this SWMP complies with Parts 2, 3, and 4 of the permit. The UA Little Rock Facilities Management (FM) department's Associate Vice Chancellor (AVC) is responsible for administering the SWMP. The UA Little Rock Environmental Health and Safety (EHS) Director in conjunction with the UA Little Rock Environmental Health and Safety Committee (EHSC) manage policy and program development.

## **STORMWATER MANAGEMENT PROGRAM**

### **Purpose and Intent**

UA Little Rock consists of approximately 12,000 students, staff, and faculty. Universities are, within their borders, essentially small communities where people live and work every day. Each community member is responsible to recognize why and how stormwater pollution is generated and transported to affected waterways. In addition, contractors who work on campus are under requirements to maintain practices that prevent runoff pollution from their activities. It is Facilities Management's goal to monitor, inform, and train those in the community as to the best methods to maintain the integrity of the waters on campus and downstream. UA Little Rock has evaluated the permit requirements for the six minimum control measures specified in Part 3.2 of the general permit. Based on that review, Best Management Practices (BMPs) are selected for each control measure that will best accomplish the overall goal of reducing pollution from stormwater runoff to the Maximum Extent Practicable (MEP). The Director of EHS is responsible for developing goals

and identifying/implementing BMPs under ARR040020. The EHSC reviews and assists with program development.

### **Reviewing and Updating the SWMP**

The EHS Office will review the SWMP annually and evaluate the implementation and effectiveness of the SWMP components. If the SWMP requires revision, updates are performed by EHS under advisement of the EHSC. Revisions are sent to ADEQ along with an explanation for and description of the changes.



### **Monitoring**

UA Little Rock will evaluate program compliance, the appropriateness of identified BMP's, and progress towards achieving identified measurable goals. The UA Little Rock campus has no retention basins for stormwater that would eventually drain to the Coleman Creek, which in turn runs into the Fourche Creek Wetlands, the Arkansas River, the Mississippi River, and on to the Gulf of Mexico. For UA Little Rock at this time, a Total Maximum Daily Load (TMDL) has not been

established for the receiving waters. In addition, none of the streams on campus are 303(d) listed for impaired waters. Therefore, UA Little Rock will not sample and analyze the discharge from the small MS4 under an established program; however, if circumstances dictate the need for sampling and analysis, UA Little Rock will act appropriately. In addition, UA Little Rock may wish to sample according to construction site stormwater management protocol.

### **Performance Standards**

BMPs and other mechanisms are examined continually to validate whether current methods are effective. Each method under the six minimum control measures has different and separate BMPs and each will be qualified on its own merit by EHS. Recommendations will be forwarded to EHSC and FM.

### **BMPs and Measurable Goals**

BMPs and measurable goals are established by assessment of needs based on project parameters and specific conditions. EHS, the EHSC, and FM work together to establish the best methods and goals to mitigate runoff pollution and achieve a desired outcome. These three entities represent a cross section of expertise in environmental, chemical, biological, engineering, and construction ideologies. Long-term goals are coordinated by the AVC of FM according the master design plans.

### **Annual Reports**

UA Little Rock will submit an annual report to ADEQ by March 31<sup>st</sup> for the previous year. UA Little Rock will report information required in Parts 3.2 and 4.3 of the general permit.

## **CONTROL MEASURES (Permit Section 3.2)**

### **1. PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS (3.2.1)**

#### **Rationale Statement and Decision Process**

UA Little Rock consists of approximately 12,000 students, staff, and faculty. UA Little Rock has multiple channels with which to communicate information to the campus community on both large and small scales. The EHS office, being the primary source of information for the public, will consult with the EHSC to maintain or develop ideas for the best methods to communicate stormwater management policies to and to receive comment from the campus. The operation of chemical and biological labs creates the opportunity to release hazardous material that may enter Coleman Creek, if not properly controlled. In addition, the operation of a motor pool, grounds maintenance, and building maintenance activities also create similar opportunities. Contractor activities also provide disruptions to the landmass that could cause stormwater pollution. EHS developed a Stormwater Management website as an adjunct to the EHS website for the purposes of communication. This site is solely dedicated to providing information and resources for stormwater related topics and to provide a method for the public to comment on stormwater management. The site is located at <http://UA.LittleRock.edu/facilities/index.php/home/environmental-health-safety/116/>. BMPs utilized to facilitate communication between EHS and the campus community are listed below.

#### **BMPs – Measurable Goals – Responsible Person(s)**

<b>BMP</b>	<b>Measurable Goal</b>	<b>Responsible Person(s)</b>
Website Creation/Maintenance	Provide information to public with comment section-quantify responses	Vince Rodgers
Policy Development	Policies in place that address possible forms of pollution	Environmental Health and Safety Committee
Contractor Management-Meet with and inform contractors of UA Little Rock policies	Participation and compliance	Leslie Hutchins, Vince Rodgers
Training	Attendees and recipients of HazMat/Chemical Hygiene/Biosafety/SDS/HazComm Training	Vince Rodgers

#### **Performance Standards**

The mechanisms to reach the campus community are predominantly electronic. For sustainability reasons, EHS and FM opt to utilize paperless communication wherever possible. Campus email, website postings, and the UA Little Rock “E-News” are alternative methods of written communication. The entire campus community is targeted in this effort and it is expected that 100% of the recipients receive messages. It cannot be determined how many recipients actually read and understand any content. Training modules that address pollutants, such as chemical hygiene and spill prevention are developed. In addition, there are ongoing training activities in labs and on job sites that address the proper handling of hazardous materials. Documentation of recipients of training is maintained by EHS. Staff are instructed on accidental releases mitigation. Contractors, being the primary source of potential runoff pollution, are informed and required by

FM and EHS to comply with ADEQ regulations and University policies pertaining to stormwater.

## **2. PUBLIC INVOLVEMENT/PARTICIPATION (3.2.2)**

### **Rationale Statement and Decision Process**

UA Little Rock encourages input and comment from the campus community regarding all facets of stormwater management. The EHS Stormwater Management website is the predominant manner in which community members can access information and provide comment on stormwater related topics. EHS, in conjunction with the EHSC and FM, makes recommendations as to how, when and why to solicit public involvement. BMPs for facilitating public involvement are listed below.

### **BMPs – Measurable Goals – Responsible Person(s)**

<b>BMP</b>	<b>Measurable Goal</b>	<b>Responsible Person(s)</b>
Website Access – links to ADEQ, EPA, and UA Little Rock policy regarding stormwater; comments can be made on the website	Number of comments; quality of involvement	Vince Rodgers
Coleman Creek annual cleanup activity	Number of Participants	Dave Millay
Earth Day Celebration	Volume of traffic to stations; pounds of recyclables collected; number of computer components/batteries collected	Sandra Vail
Recycling – bins are located throughout the campus to collect paper, plastic, and aluminum	Annual pounds collected	Sandra Vail
UA Little Rock Sustainability Committee – encourages participation through seminars/webinars to increase awareness	Number of participants	Committee Chair

### **Performance Standards**

The above listed BMPs will be evaluated for effectiveness as needed. Data is stored for reference.

## **3. ILLICIT DISCHARGE AND ELIMINATION (3.2.3)**

### **Rationale Statement and Decision Process**

Illicit discharges have not been problematic on campus in recent years; however, programs need to be in place to address the possibility. Illicit discharges on campus are strictly prohibited to include illegal dumping in accordance with 40 CFR 122.26 (b)(2). The UA Little Rock Department of Public Safety (DPS) enforces pollution laws and responds to any incidences. FM and EHS work closely with DPS to ensure that any detected incidences of illicit discharge are thoroughly investigated and mitigated. All student chemical activity is monitored by faculty and staff at the class/lab level. Any waste generated by chemical, biological, or physical means is collected and disposed of according to federal and state regulations and per the UA Little Rock Chemical

Hygiene Plan, Biosafety Manual, Radiation Safety Policy, Recycling Program, and general waste management practices. The EHS office and the Chemical Hygiene Officer (CHO) manage the day-to-day operations for chemical safety and hygiene by routine inspections, training, and lab design. UA Little Rock prohibits improper waste disposal per the Chemical Hygiene Plan and Biosafety Manual. In addition, UA Little Rock's designation as a Conditionally Exempt Small Quantity Generator (CESQG) by ADEQ requires that we follow waste management protocols and procedures dictated by Regulation 23. Plans and programs are available to the community through the EHS website that outline in detail chemical and biological hazardous material handling procedures. The Director of Facility Services coordinates operations that may result in pollutant runoff. Oil from auto-maintenance operations is collected and stored in two 250 gallon above ground tanks until the oil is picked up for recycling. UA Little Rock uses green cleaning products wherever practical. Fertilizers and herbicides are used at a minimum and lawn irrigation performed only as necessary to maintain the grounds. FM maintains a map of all systems including storm sewers and outfalls. This map is updated as needed by the FM Engineer. Additionally, EHS is developing current stormwater topical maps using GIS technology and up-to-date aerial photography to assist in planning efforts. Architects are consulted when new structures are erected and are charged with developing adequate drainage plans for stormwater. In addition, EHS will work with Environmental Health Sciences to review samples collected during appropriate semesters. Readings for pH, dissolved oxygen, 5-day biological oxygen demand (BOD<sub>5</sub>), total suspended solids (TSS), and phosphorus to assess stream conditions and program BMPs.

### **Identified Sources of Illicit Discharge**

No identifiable sources of runoff significantly affect water quality at UA Little Rock; however, there are possible sources. Lawn irrigation, HVAC condensate, roof/building drainage to grade, and accidental releases of chemical and biological agents are monitored and controlled to mitigate release. It is the responsibility of EHS, FM Mechanical Engineers, and FM Capital Planning and Construction to formulate mapping of all stormwater flows and outfalls. In addition, UA Little Rock FM staff should be cognizant of developments that could influence stormwater control. UA Little Rock considers the discharges listed in Part I.C.2 of the permit to be allowable non-stormwater discharges. These discharges will be unregulated unless UA Little Rock identifies them as a significant contributor of pollutants to the MS4. DPS patrols the campus 24 hours a day and any activity that may be construed as "illegal" is addressed immediately. In addition, UA Little Rock installs and monitors video surveillance cameras at construction sites and other sites on campus.

### **BMPs – Measurable Goals – Responsible Person(s)**

<b>BMP</b>	<b>Measurable Goal</b>	<b>Responsible Person(s)</b>
DPS – Enforces pollution laws	Number of violations	Chief of Police
Lab inspections	Number of violations	Vince Rodgers
Lab-Pak – chemical waste collection, storage, and disposal	Amount of material	Vince Rodgers, Liz Smith
Policy development and review	Affective and effective to specific areas	EHSC
Street sweeping (collection of debris), green chemical use, lawn irrigation, fertilizer use	Active monitoring by FM and EHS	Sandra Vail, Vince Rodgers
Update maps as needed	Identify collection areas and outfalls	Robin Sipes, Vince Rodgers
Collect sample data	Maintain reasonable parameter levels	Vince Rodgers

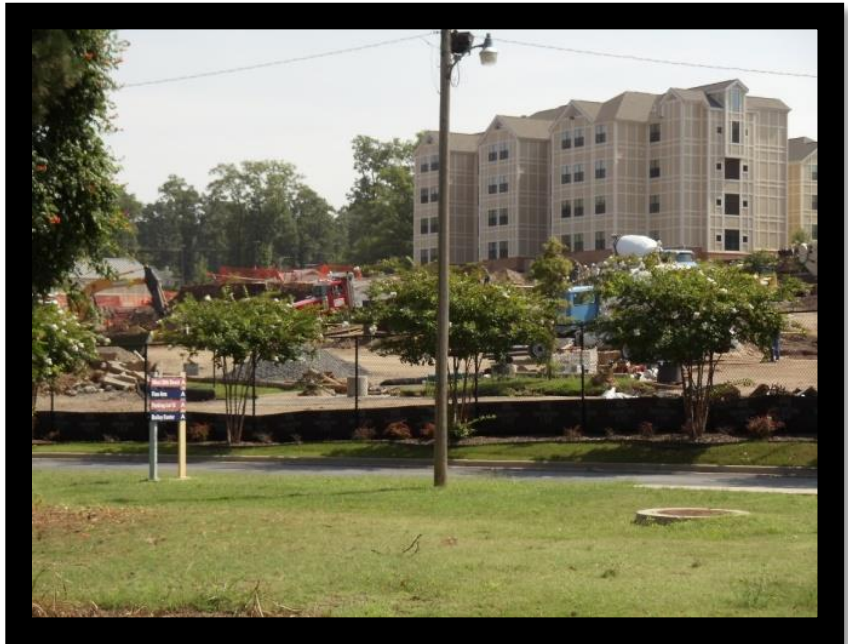
## **Performance Standards**

All data regarding performance will be assessed at least annually and actions will be taken according to effectiveness.

### **4. CONSTRUCTION** **SITE STORMWATER** **RUNOFF CONTROL** **(3.2.4)**

#### **Rationale Statement and** **Decision Process**

Construction activities are perhaps the most obvious source of runoff pollution. In order to ensure that BMPs are observed, UA Little Rock established requirements for community members and contractors. FM and EHS will oversee all construction sites and SWPPPs for control of sediments, erosion, and waste (particularly concrete wastes) by pre-construction review of plans and monthly inspection throughout the course of construction. If inspection violations are not corrected, UA Little Rock will refer non-compliance activities to ADEQ. Likewise, any illicit discharges discovered from non-construction activities will be remanded to the proper authorities.



#### **Procedures for construction-site inspection**

Inspections begin with a review of maps and familiarization with area roads, land uses, and natural features. Inspectors will review any documents pertaining to the construction of the area such as SWPPPs, site plan maps, other permits granted to the contractor, records of previous compliance, and NOIs. Inspections will be conducted according to the contract documents and as deemed necessary by UA Little Rock Environmental Health and Safety. The inspection will be conducted as described below.

*The inspector will:*

- 1. Introduce himself as the UA Little Rock SWPPP inspector and communicate to the contractor's representative that an inspection is occurring.*
- 2. Request or locate the on-site copy of the SWPPP and become familiar with any changes that have been made to the SWPPP.*
- 3. Walk (or slowly drive) the perimeter of the site and note outfalls to water and/or drainage channels.*
- 4. Inspect outfalls for signs of wastes and sediment. Document any waste or sediment.*
- 5. Inspect active and inactive portions of the construction areas for properly installed BMP's and material storage.*
- 6. Communicate with the contractor the status of compliance and make recommendations for any corrections.*

7. Follow up on corrections and communicate to the contractor if the violations should be referred to ADEQ for further investigation.

**BMPs – Measurable Goals – Responsible Person(s)**

<b>BMP</b>	<b>Measurable Goal</b>	<b>Responsible Person(s)</b>
Perform dry weather field screening by qualified personnel	Number of violations	Vince Rodgers
Construction site SWPPP management and inspection.	Number of violations	Vince Rodgers
Maintain and update topographical maps	Efficiency of and ability to ID outfalls and predict flow patterns	Vince Rodgers, Robin Sipes, Leslie Hutchins
Police patrols, surveillance cameras, discharge monitoring	Number of violations or pollution instances	Vince Rodgers, Chief of Police

**Performance Standards**

As the campus grows, more requirements will be made of stormwater management programs. UA Little Rock will continually enhance programs as necessary and implement changes required to mitigate pollution. As the topography changes, so must UA Little Rock adapt existing and new systems. Construction activities will continue to be monitored and pre-construction conferences held to identify expectations for stormwater control for all applicable projects.

**5. POST-CONSTRUCTION STORMWATER MANAGEMENT (3.2.5)**

**Rationale Statement and Decision Process**

UA Little Rock has and updates the Campus Master Plan for campus and community long-range renewal and growth opportunities. The plan consists of two companion documents, the University's strategic plan, and a plan for the University District that focuses on revitalizing the immediately surrounding city areas. Both documents include strategies for stormwater management. Post-construction BMPs will ultimately conform to drainage and runoff strategies associated with the Master Plan.

Post-construction stormwater management is a key activity to ensure that when BMPs used during construction are removed, runoff is monitored and evaluated for possible pollutants. The requirements to correct any deficiencies with stormwater runoff will be the responsibility of the contractor under the direction of FM and EHS. Any corrections not addressed by contractors will be reported to ADEQ. EHS will inspect and evaluate runoff under the following conditions:

1. Dry-weather screening
2. Following rain events
3. Building systems drainage
4. Activity based pollution opportunities
5. Sampling, where applicable

These parameters will be assessed by a qualified staff member and any deficiencies and corrections will be forwarded to the contractor for immediate rectification. In addition, it is UA Little Rock's goal to assure post-construction TSS levels are within 20% of TSS pre-construction levels. Landscaping activities, which follow construction, will incorporate non-structural BMPs to mitigate runoff such as riparian buffer zones, natural abstractions, preserving undeveloped land

areas (natural settings), continue to maximize development of green areas, and minimize impervious areas where possible.

**BMPs – Measurable Goals – Responsible Person(s)**

<b>BMP</b>	<b>Measurable Goal</b>	<b>Responsible Person(s)</b>
Develop BMPs that work in confluence with the Master Plan	Administrative approval of direction of SWMP	David Millay
Post-Construction inspection and evaluation	Number of violations/corrections	Vince Rodgers, Leslie Hutchins
Sample pre and post construction	Maintain acceptable TSS levels	Vince Rodgers
Utilize non-structural BMPs	Reduction in runoff pollution opportunities	Sandra Vail, Vince Rodgers

**Performance Standards**

Post-review of pre-construction runoff plans will be evaluated for consistency of the design of drainage strategies. Regular inspections and buildings and grounds maintenance will ensure maximum runoff mitigation effects. FM and EHS will oversee long-term management of BMPs.

**6. POLLUTION PREVENTION AND GOOD HOUSEKEEPING (3.2.6)**

**Rationale Statement and Decision Process**

It is important to maintain the campus in a manner that reduces the opportunity for stormwater pollution. Many campus activities could affect water quality if left unmonitored and controlled. UA Little Rock has in place buildings and grounds maintenance operations that are designed to enhance the beauty of the campus and prevent pollutants from entering Coleman Creek and subsequent water bodies.

Streets and grounds are kept clean of trash and debris by FM. All materials collected are either recycled or disposed of as waste. Building systems are maintained to prevent fluid leakage and any byproducts of processes or spills are collected and disposed of in accordance with ADEQ regulation 23. Automobiles are regularly maintained and waste petroleum products are collected in above ground storage tanks. A professional waste management company collects the tank contents. Daily cleanup activities ensure that debris is disposed of before it can get into Coleman Creek. Grounds are landscaped to enhance the natural beauty of the campus, which in turn provides natural abstractions that mitigate runoff. Employees are trained on how to recognize hazards to protect themselves and the campus grounds. Parking lots are maintained routinely and any leaks/spills are absorbed and collected whenever possible. UA Little Rock has an aggressive recycling program that includes paper, plastic, aluminum, batteries, computer components, fluorescent lamps and HID/MV bulbs, and other miscellaneous recyclables.

Each FM employee has a basic understanding of safety data sheets (SDS) and biological hazards so they can report possible hazards to their supervisor. EHS oversees the HazMat Response. EHS maintains certification under OSHA HAZWOPER 24 and 40-hour criteria.

**BMPs – Measurable Goals – Responsible Person(s)**

<b>BMP</b>	<b>Measurable Goal</b>	<b>Responsible Person(s)</b>
Custodial operations &	Number of community complaints,	Sandra Vail

grounds maintenance – landscaping	overall cleanliness maintained	
Building systems & automobile maintenance	Tracking of systems for malfunction/leaks, etc	Mike Seamon
Employee training	Overall awareness	Vince Rodgers
Recycling	Amounts collected	Sandra Vail, Vince Rodgers

### **Performance Standards**

General housekeeping standards are maintained by the FM Director of Facility Services. Each employee receives annual, or as needed, training relevant to maintaining a clean work environment, which influences good stormwater management. The SWMP is reviewed by EHS at least annually for appropriateness and effectiveness.

### **SHARING RESPONSIBILITIES**

UA Little Rock has the sole responsibility to implement all measures described in this program.

### **SWMP REVIEW AND UPDATE**

Annual evaluations, reviews, and updates are managed by EHS with input from the EHSC. ADEQ will be notified in writing before any additions to goals, BMPs, authority or other pertinent processes occur and in accordance with section 3.4 of the general permit.

### **MONITORING**

UA Little Rock is not under any TMDL requirement per the individual permit. In addition, no discharges into 303(d) listed waters are applicable.

### **RECORDKEEPING AND REPORTING**

All plans, inspections, SWPPPs, NOIs, NOTs, NOCs, and any other relevant documentation regarding stormwater management will be kept on file at FM for a period of not less than 3 years. Annual reports will be submitted by EHS to ADEQ in accordance with section 4.3 of the general permit.



**Appendix B (SWPPP Inspection Form)**

**STORMWATER POLLUTION PREVENTION PLAN  
INSPECTION AND MAINTENANCE REPORT FORM**

INSPECTOR: \_\_\_\_\_ DATE: \_\_\_\_\_

DAYS SINCE LAST RAINFALL: \_\_\_\_\_ AMOUNT OF LAST RAINFALL \_\_\_\_\_

AREA	DATE SINCE LAST DISTURBED	DATE OF NEXT DISTURBANCE	STABILIZED (YES/NO)	STAB. WITH	CONDITION

STABILIZATION REQUIRED:

**SILT FENCE**

IS THE BOTTOM OF THE FABRIC STILL BURIED? \_\_\_\_\_  
 IS THE FABRIC TORN OR SAGGING? \_\_\_\_\_  
 ARE THE POSTS TIPPED OVER? \_\_\_\_\_  
 HOW DEEP IS THE SEDIMENT? \_\_\_\_\_  
 MAINTENANCE REQUIRED FOR SILT FENCE: \_\_\_\_\_

**SEDIMENT BASIN**

DEPTH OF SEDIMENT IN BASIN? \_\_\_\_\_  
 CONDITION OF BASIN SIDE SLOPES? \_\_\_\_\_  
 ANY EVIDENCE OF OVERTOPPING OF THE EMBANKMENT? \_\_\_\_\_  
 CONDITION OF OUTFALL FROM SEDIMENT BASIN? \_\_\_\_\_  
 MAINTENANCE REQUIRED FOR SEDIMENT BASIN: \_\_\_\_\_

**CONSTRUCTION EXIT**

DOES MUCH SEDIMENT GET TRACKED ON TO ROAD? \_\_\_\_\_  
 IS THE GRAVEL CLEAN OR FILLED WITH SEDIMENT? \_\_\_\_\_  
 DOES ALL TRAFFIC USE THE STABILIZED EXIT TO LEAVE THE JOB SITE? \_\_\_\_\_  
 IS THE CULVERT BENEATH THE EXIT WORKING? \_\_\_\_\_  
 MAINTENANCE REQUIRED FOR CONSTRUCTION EXIT: \_\_\_\_\_  
 CHANGES TO BE PERFORMED BY: \_\_\_\_\_ ON OR BEFORE: \_\_\_\_\_

CHANGES REQUIRED TO THE STORMWATER POLLUTION PREVENTION PLAN:

REASONS FOR CHANGES:

"I certify under penalty of law that this document was prepared under my direction or supervision. 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

**For additional information, please use a separate page.**