**ITD 2802 Instructions and Inspection Procedures**

**General Information**

The inspection and documentation procedures must follow 2012 Construction General Permit (CGP) requirements.

A copy of the National Pollution Discharge Elimination System (NPDES) CGP and a copy of the current Stormwater Pollution Prevention Plan (SWPPP) must be available on the project site, or at an easily accessible location at all times per CGP section 7.3.

On all ITD projects with coverage under the CGP, the Prime Contractor must designate a Water Pollution Control Manager (WPCM) as specified in and required by ITD Contract. The WPCM performs stormwater compliance inspections on behalf of the Contractor, resolves compliance issues, and communicates regularly with ITD as part of the CGP required Stormwater Team and as required by the Engineer.

If there are any questions pertaining to the project SWPPP, contact the Senior Environmental Planner in the District.

If there are any questions regarding contract administration, contact Headquarters Construction.

If there are any questions regarding documentation and recordkeeping requirements, reporting of permit noncompliance or discharge events, contact the Stormwater Compliance Coordinator in the Headquarters Environmental Section.

**Section 1 – Project Information**

* Provide the EPA assigned unique NPDES permit tracking number for ITD and the Prime Contractor.
* Indicate whether the Prime Contractor has filed their Notice of Termination (NOT) of permit coverage, and if so, the date filed. If the Contractor has filed their NOT, the WPCM and Contractor are no longer required to sign the inspection forms.

**Section 2 – Inspector Information**

* Each project must be inspected by an ITD qualified Environmental Inspector and/or Prime Contractor designated, ITD qualified WPCM. Include the Inspector name and ITD Inspector Qualification Program (IQP) number. Enter WPCM qualification information into ITD 2802, Section 8 if applicable.
* Check the box that represents the Inspector’s Designation, i.e., who participated in completion of the inspection. More than one box may be checked. Checking the first box represents a joint inspection by the ITD inspector and the WPCM.

**Section 3 – Inspection and Weather Information**

* The number of days since the last inspection is determined by counting the number of days beginning the day after the last inspection took place. For example, if an inspection was done on June 1st, the next 7-day inspection would be due on June 8th and the next 14-day inspection would be due on June 15th.

* Inspection frequency can change throughout the life of a project as long as a SWPPP modification is completed to document the change. Your SWPPP should always reflect the current frequency. Indicate whether a routine inspection is being performed or if it is a rain event inspection by checking the appropriate box. If needed, provide an explanation for any special circumstances or special inspection frequency in the space provided.
* Inspections are required during the project’s normal working hours during Work Days as defined in CGP Appendix A, and should be documented in the SWPPP. Significant changes to the normal work day schedule should be documented in the SWPPP as a modification as needed. Outside of normal working hours on Work Days, WPCM inspections are required as specified by the Contract and/or by the Engineer.
* Provide a description of the weather conditions at the time of inspection, including the current temperature and cloud cover.
* If performing rain event inspections, each project must be inspected within 24 hours of a storm event producing 0.25 inches or greater. If the storm event is multiple days, and each day produces 0.25 inches or greater, another inspection must be completed within 24 hours after the end of the storm event. See CGP sections 4.1.2.2, 4.1.3.2, and 4.1.4.2 for additional rain event inspection information.
* For any day of rainfall during normal working hours that measures 0.25 inches or greater, you must record the total rainfall measured for that day in accordance with CGP section 4.1.7.1.d. Provide a description of each measureable precipitation event since the last inspection. Provide the date(s) and approximate amount of measureable precipitation recorded on the project.
* To determine storm events at your project, you must either keep a rain gage at the project in order to obtain site-specific rainfall information, or obtain the storm event information from a weather station that is representative of your project.

**Section 4 – Construction and Stabilization/SWPPP Recordkeeping Status**

* No clearing or grubbing is allowed outside the physical clearance limits shown on the site plans of any project. No clearing or grubbing shall take place outside the schedule in the project SWPPP.
* Estimate to the nearest ¼ acre the amount of land **currently** disturbed by construction and not stabilized with erosion controls. This is not the total project area, just what is currently disturbed. All areas disturbed including staging areas, stockpile areas, waste sites, and source areas must be included in the disturbed area calculation, unless the source areas are covered by a separate Multi Sector General Permit (MSGP). ITD specification 212.03 includes additional requirements for disturbed acreage limitations and installation of erosion and sediment controls.
* Estimate to the nearest ¼ acre the amount of land that has been temporarily stabilized with erosion controls. This does not include sediment controls such as perimeter protection. Only include erosion controls such as tackifier, mulch, plastic, blankets, etc.
* Estimate to the nearest ¼ acre the amount of land that has been permanently stabilized with erosion controls.
* Provide to the nearest ¼ acre the total disturbed acreage expected on the project. All three of the previous boxes (currently disturbed, temporarily stabilized, permanently stabilized) should add up to the total project area disturbance.
* Confirm that the project SWPPP reflects the most current project conditions, and provide the date of the most recent SWPPP update or modification. This includes routine SWPPP updates, recordkeeping, and/or formal SWPPP modifications.
* Provide any additional information or comments pertaining to the area of disturbance, stabilization, SWPPP status, etc. as needed.

**Section 5 – Construction Areas, Discharge Points, and Installed Controls (BMPs) Inspected**

**General Procedures/Requirements:**

* Include an explanation for any areas not inspected in ITD 2802, Section 5 in the Observations columns of the tables.
* Inspectors must look for evidence of or the potential for stormwater, non-stormwater, and pollutants discharging from and leaving the project limits, and/or entering the stormwater conveyance system or Water’s of the U.S.

* Inspections need to include all construction areas and construction support areas, on-site and off-site, disturbed by construction activity, including waste sites, stockpiles, storage sites, and borrow areas, etc.

* Identify locations examined using descriptions like station numbers, mileposts, or other location designations.
* ITD 2802, Section 5 is not locked so that entries can be added or deleted to each table. To add a row to the end of a table, tab to the last cell of the last row and hit the tab button. To add a row to the middle of the table, place the cursor into the row you want to add to above or below, and right click your mouse. Click on Insert, and then Insert Above or Insert Below.
* To Delete an existing row, place the cursor into the row you want to delete, and right click your mouse. Click on Delete Cells, and then click Delete Entire Row.

**Construction Areas:**

* Fill out the table concerning Areas Cleared or Graded, Onsite and Offsite Waste/Borrow/Stockpile areas, Equipment Storage/Maintenance/Fueling Areas, Contractor Yards and Material Storage Areas, and Site Entrances/Exits.
* Erosion, sedimentation, and pollution prevention control measures identified in the SWPPP need to be observed in order to ensure proper installation and operation at these locations.
* Inspect locations where vehicles enter or exit the site for evidence of off-site sediment tracking. Track-out must be removed by the end of the same work day in which it occurred. See CGP section 2.1.2.3 for more information.

**Discharge Points:**

* Fill out the table listing all Discharge Points, or areas where the potential for discharges from the project exist. Some examples of these include median drain, cross drain, box culvert, drop inlet, perimeter control along a surface water, bridge abutment, etc.
* Discharge locations need to be inspected to ascertain whether erosion and sediment control measures are operating effectively and are adequate to ensure water quality standards are being met.
* If a discharge location is identified during an inspection that is not listed in the current SWPPP, and additional BMPs are required to address the new location, the SWPPP needs to be modified to include this location and required controls. Additionally, Corrective Action reporting may be required. See ITD 2802, Section 6 below for additional information.
* Identify if discharges are occurring or have occurred, and whether they have entered Waters of the U.S. If this has occurred, describe the discharge and whether the BMPs have operated effectively enough to meet water quality standards.
* If discharges have exceeded 50 NTU above background of the receiving water, or a prohibited discharge occurred per CGP Part 2.3.1, additional reporting requirements exist. Use form ITD 2790 and follow the instructions associated with that form. Also complete Corrective Action reporting requirements as described below in ITD 2802, Section 6.

**Installed Controls (BMPs):**

* Fill out the table listing all BMPs installed at the time of inspection. Add controls to the table as they are installed during construction build-out and phasing. On smaller projects you can list each individual control by its specific location. On larger more expansive projects with significant controls you can group the type of control together but list the multiple locations where it is installed.
* Some examples of these include perimeter controls such as fiber rolls or silt fence; erosion controls such as tackifier, mulch, or blankets; sediment controls such as rock check dams or inlet protection; sediment basins; or pollution prevention controls such as concrete washouts, dumpsters, portable toilets, etc.
* As controls are removed from the project, either delete them from the table, or simply note “removed on date X” in the Observations column for that control.

**Section 6 – Maintenance Requirements, BMP Installations (per SWPPP), and Corrective Actions**

**Maintenance Requirements and BMP Installations per SWPPP:**

* Per CGP sections 2.1.1.4 and 2.3.2, ensure that all erosion and sediment controls and pollution prevention controls remain in effective operating condition during permit coverage.
* If inspection reveals maintenance is required on erosion and sediment controls or pollution prevention controls, if the problem does not require significant repair or replacement, or can be corrected through routine maintenance, you must initiate work to fix the problem immediately after discovering the problem and complete the work by the close of the next work day. Examples include removing accumulated silt from behind a silt fence or check dam, or re-staking fiber wattles that are dislodged, basic site clean-up or housekeeping issues, etc.
* When installation of a new erosion or sediment control or pollution prevention control is needed, or a control requires significant repair, a new or modified control must be installed and operational by no later than 7 calendar days from the day of discovery. In the *Action Taken* or *Action Required* boxes of the tables in 2802 Section 6, indicate if the control is being installed per the SWPPP document or if it is a new, additional, or modified control not listed in the original SWPPP.
* If it is a new, additional, or significantly modified control not listed in the original SWPPP, it qualifies as a one of the Conditions Triggering Corrective Action Report, and additional documentation requirements apply per CGP section 5.4.1 and 5.4.2.
* Once any new control listed in ITD 2802 Section 6 has been installed, it should be listed in the Installed Controls (BMPs) table of ITD 2802 Section 5 of the following inspection report.
* There are instances where correcting BMP Deficiencies within 7 days could cause harm to water quality. An example is that site conditions are so wet that getting the equipment onto the project site to address the deficiencies could result in off-site discharge, therefore, the deficiency cannot be addressed until conditions dry out. In a case like this, thorough documentation of site conditions and weather conditions preventing the item from being corrected and completed is required.
* In the first box of ITD 2802, Section 6, provide information regarding actions taken/completed since the last inspection. This includes maintenance and installation actions identified on the previous inspection report that are carried over to document their completion, or actions identified since the last inspection was completed that have already been completed because completion was required by the day after they were identified (i.e. between inspections).
* In the second box, provide information regarding maintenance and installation actions identified during the current inspection that require completion, or items that were not satisfactorily completed from the previous inspection. This could also include new installation of BMPs that are already part of the SWPPP plan, but have not been installed yet due to project phasing or build-out.
* When describing maintenance or installation actions, include item number and inspection number (item 1 on inspection 20 would be shown as 20-1, item 2 would be shown as 20-2, etc.), the BMP location(s), action taken or required, and the date completed or required to be completed based on the type of action.
* Per CGP section 4.1.6.5, identify in the box provided any and all actual or potential incidents of CGP noncompliance observed.

**Conditions Triggering Corrective Action Report(s):**

* In the 2012 CGP section 5.2.1, there are 3 conditions which would trigger the completion of a Corrective Action Report(s). This is an additional layer of documentation in the SWPPP on top of the inspection and the SWPPP modification/amendments. The three check box options represent the conditions that would require the completion of a Corrective Action Report(s).

* Checkbox one represents the installation of BMPs that are not part of the original project plans or SWPPP, or a significant change in installation becomes required that is not part of the SWPPP. Based on observations made during the inspection, indicate where additional BMP(s) or modifications are required to ensure permit compliance. If this box is checked, you will need to make 24-hour and 7-day entries into the Corrective Action Reporting Tables in the project SWPPP; and upon installation, enter the new BMP into ITD 2802, Section 5 of the subsequent inspection. You will also need to add an entry into the SWPPP modification log within 7 days, and have both entries certified using the appropriate certification sheet in the SWPPP appendices.
* Checkbox two represents a situation where a BMP failed to operate as designed, proved inadequate, or wasn’t installed properly resulting in discharges of sediment or other pollutants from the site that violated Idaho water quality standards. If this box is checked, you will need to make 24-hour and 7-day entries into the Corrective Action Reporting Tables in the project SWPPP; and upon installation, enter the new BMP(s) into ITD 2802, Section 5 of the subsequent inspection. You will also need to add an entry into the SWPPP modification log within 7 days, and have both entries certified using the appropriate certification sheet in the SWPPP appendices. You should also have filled in discharge information in the appropriate part of ITD 2802, Section 5 as described above, including completion of form ITD 2790 with submittal to the HQ ENV SWPPP mailbox. A discharge that violates Idaho water quality standards must be reported to EPA verbally within 24 hours and in writing within 5 days per 2012 CGP Appendix I.12.6. See the non-compliance reporting process at the end of these instructions for more details.
* Checkbox three represents a situation where a prohibited discharge (toxic or hazardous material) per CGP section 2.3.1 has occurred. If this box is checked, you will need to make 24-hour and 7-day entries into the Corrective Action Reporting Tables in the project SWPPP, and if BMP installation is required, enter the new BMP (s) into ITD 2802, Section 5 of the subsequent inspection. You may also need to add an entry into the SWPPP modification log, and have both entries certified using the appropriate certification sheet in the SWPPP appendices. You should also have filled in details of the discharge in the appropriate part of ITD 2802, Section 5 as described above, including completion of form ITD 2790 with submittal to the HQ ENV SWPPP mailbox. A toxic or hazardous material discharge must be reported to EPA verbally within 24 hours and in writing within 5 days per 2012 CGP Appendix I.12.6. See the non-compliance reporting process at the end of these instructions for more details.

* All Corrective Action Reports and SWPPP modifications must be signed and certified by the same ITD and Prime Contractor authorized representatives who signed the original SWPPP, or their duly authorized representatives per 2012 CGP Appendix I.11. That authorization must be made using the appropriate Delegation of Authority sheet in the SWPPP appendices. The revisions are also required to be made on plan sheets (similar to “as constructed” drawings). Refer to CGP section 7.4 for all instances requiring SWPPP modifications.

**Summary of Inspection Findings:**

* Use the checkboxes to summarize the overall findings of the inspection. One of the top three boxes will be checked on every inspection, but often an additional box will be checked. One or more of the fourth-sixth boxes are checked in addition to one of the top three if you note new maintenance or installation requirements, or corrective action requirements during the current inspection.
* First box would be checked if no maintenance items were noted in Section 6 of the previous ITD 2802.
* Second box would be checked if maintenance items noted in Section 6 of the previous ITD 2802 have all been completed, and no further action is required on those items. Those items should be identified in the first table of Section 6 of the current ITD 2802 as actions taken with the date completed.

* Third box would be checked if maintenance items identified in Section 6 of the previous ITD 2802 have not all been completed, not completed satisfactorily, or require additional or further action. They should be identified in the second table of Section 6 of the current ITD 2802 documenting that additional action is required. This scenario may indicate CGP noncompliance since CGP sections 2.1.1.4 and 2.3.2 specify maintenance completion timelines. If CGP noncompliance exists, provide that information in the last table (box) of Section 6 of the current ITD 2802.
* Fourth box would be checked in addition to one of the previous three if new maintenance requirements have been identified during the current inspection, and these would be noted in the second table of Section 6 of the current ITD 2802.
* Fifth box would be checked in addition to one of the previous four if new installation requirements per the initial SWPPP have been identified during the current inspection, and these would be noted in the second table of Section 6 of the current ITD 2802.
* Sixth box would be checked if one of the three boxes under the *Conditions Triggering Corrective Action Report* in Section 6 of the current ITD 2802 has been checked. If this is checked because of a discharge (second and third boxes), there should also be discharge information entered into the *Discharges Entering Waters of the US* tables of Section 5 of the current ITD 2802.
* Seventh box would be checked if the sixth box was checked, and discharge information is entered into the *Discharges Entering Waters of the US* tables of Section 5 of the current ITD 2802. This box would also be checked and an ITD 2790 submitted if the conditions identified as “Upset” in CGP Appendix I, section I.14 have occurred.

**Section 7 – Other Outstanding Items**

* Document any outstanding issues or project information, or any other issues determined not to be related to BMP maintenance, installation, or Corrective Action here.

* Document any special permitting information, special operating conditions, etc. This could include Army Corps of Engineers permitting information, IDWR stream alteration permitting information, CGP turbidity monitoring requirements, project scheduling driven by a BA or BO, etc.

**Section 8 – Inspection Certification**

* Within 24 hours of each completed inspection, the Primary inspector shall sign and date the inspection to certify completion and inspection findings, and the Primary Inspector or the WPCM shall make the Prime Contractor aware of the inspection findings.
* The WPCM is strongly encouraged to conduct joint inspections with the Primary inspector whenever possible. The WPCM is required to document their site inspections(s) and may do so by signing the ITD inspection report as documentation that he/she participated in a joint inspection with the Primary inspector. When signing, include the most recent WPCM training qualification date and unique qualification number.
* If a joint inspection is not feasible, the WPCM must complete an independent inspection using ITD 2802 to document their inspections per Contract requirements. ITD does not sign any independent WPCM inspections. If the WPCM performs independent inspections, it is not recommended that the inspections be included as formal SWPPP recordkeeping inspections, as this could create discrepancies with maintenance/installation requirements and corrective action tracking and completion records. However, they should be inserted into the SWPPP as an appendix. If requested, these independent inspections must be made available to the Engineer.
* The Prime Contractor must check the box that represents his/her interpretation of the inspection findings. Either agrees with findings, or disagrees with findings. If disagrees, the Prime Contractor must specify the reason for disagreement in the box provided. Sign and certify the form per CGP requirements. The Prime Contractor's signature must be that of the individual who certified the SWPPP and/or NOI, or their duly authorized representative. Refusal to sign the form could result in a breach of contract as well as CGP noncompliance.
* Any delegation of signature authority to someone other than the signer of the initial SWPPP must be documented in the SWPPP.
* The ITD District Engineer, or ITD District Engineering Manager as their Duly Authorized Representative, must sign and date the inspection. Any delegation of signature authority must be documented in the project SWPPP.

**ITD 2802, Corrective Action Reporting, and SWPPP Modification Submittal and Distribution Process**

* Records of inspection, corrective action, or SWPPP modification completion can be accomplished by inserting a copy of the unsigned/uncertified documentation in the SWPPP as a placeholder until the certified copy is routed back to the SWPPP. This documents completion of any maintenance, installation, or corrective action requirements, and can be referenced while the physical document is routed for signature/certification. This record provides documentation that the work was completed as required, while the original document is routed for required signatures and certifications.
* Upon completion, and once signed by the Primary Inspector and WPCM, the ITD 2802 is distributed to the District Engineer and Prime Contractor, or their duly authorized representatives, for signature and certification.
* Upon completion of any corrective action reporting and/or SWPPP modifications, the signature and certification sheet describing actions taken is distributed to the District Engineer and Prime Contractor, or their duly authorized representatives, for signature and certification.
* The signed and certified ITD 2802 and any corrective action and/or SWPPP modification signature and certification sheet should be placed back into the SWPPP recordkeeping section within approximately 2 weeks of completion, per EPA recommendations.
* Upon completion of all signatory and certification requirements, the completed ITD 2802 is distributed to the District Engineer, District Engineering Manager, Resident Engineer, District Senior Environmental Planner, Headquarters Environmental via the HQ ENV SWPPP Inbox, and the Prime Contractor.
* Hard copies of all original, signed and certified ITD 2802s and other SWPPP records are archived by project by the Districts and retained for three years from the date the permit expires or is terminated.

**Non-Compliance Reporting Process**

* Per CGP sections 5.2.1.2 and I.12, noncompliance issues which endanger health or the environment must be reported to EPA verbally within 24 hours and in writing within 5 days of discovery. Any violation of Idaho water quality standards or prohibited discharge per CGP section 2.3.1 is considered to endanger health or the environment. District staff must report any instances of noncompliance to the Headquarters Environmental as soon as any issue is discovered so that it can be reported to EPA verbally.
* District staff must not report noncompliance directly to EPA. All communications with EPA must be completed through Headquarters Environmental or ITD’s Legal Department Attorney General representative.
* Noncompliance issues must be reported through the HQ ENV SWPPP e-mail inbox using ITD 2790 as soon as identified. Provide all required information on the ITD 2790 to capture the noncompliance issue being reported. Follow the directions on that form.
* If there is uncertainty as to whether or not an issue of noncompliance exists, it is best to be cautious and report any issues that could be deemed non-compliant. Headquarters Environmental and ITD Legal can determine if the issue represents reportable noncompliance to EPA.