

NPDES Stormwater Inspector Qualification Re-certification through Reciprocity

If your Idaho Transportation Department of Transportation (ITD) Inspector Qualification for the National Pollutant Discharge Elimination System (NPDES) Stormwater was obtained under the 2012 Environmental Protection Agency (EPA) Construction General Permit (CGP) through WPCM reciprocity, it was only valid through the length of the 2012 CGP as stated on the ITD Inspector certificate of completion.

A new CGP was issued by the EPA in February 2017 and contains almost identical requirements to the 2012 CGP. ITD is requiring all individuals who want to maintain their Inspector certification to receive training on the 2017 permit. To do so, an individual holding an existing WPCM certificate of completion may choose either A or B.

A

- Submit a completed ITD 2905 form, and
- A WPCM certificate of completion held after 3-15-17

B

- Submit a completed ITD 2905 form,
- A copy of ITD's self-certification form that you have read and signed, and
- A copy of an ITD 2802 Inspection form from an ITD or LHTAC project which you have signed as the inspector. This must be a project that falls under the requirements of the CGP.
 - Form 2786 (Construction Site Inspection Report) cannot be submitted in-lieu of Form 2802 due to the fact that 2786 are used for those projects that do not meet the regulatory need for CGP permit coverage.
 - This inspection must have taken place in the last 2 years. Inspections reports (2802s) prior to March 1, 2015 will not be considered valid.

Forms can be submitted in hard copy or electronically to:

Garth Newman
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Idaho Transportation Department
Training & Development Section
P.O. Box 7129, Boise, Idaho 83707-1129
Garth.newman@itd.idaho.gov.

2017 Construction General Permit Self-Certification Form

The 2017 CGP, although formatted a little differently, contains mostly identical requirements of the 2012 CGP. Some of the changes listed below have a description of suggested ways to comply with the new requirements. The list is not exhaustive, but is intended to summarize the most important changes that need to be implemented by you on ITD and LHTAC construction sites. ITD’s Environmental Section recommends that, as with the 2012 CGP, you read and understand all the requirements of the entire 2017 CGP.

The following is a list of changes for the 2017 CGP from the 2012 CGP.

CGP Section	Summary
1.4.2	The Notice of Intent (NOI) must be submitted through the NPDES eReporting Tool (NeT) system. Users still use their CDX account, however NeT is a different “program service” in the CDX system. You will need to add NeT to your programs inside CDX in order to file a NOI.
1.4.4	Within NeT there is a form to submit for modifying active NOI’s. If you need to modify the NOI, you will need to log into your CDX account and complete the form.
1.5	A notice to the public about how to obtain a copy of the SWPPP and a separate notice for reporting potential violations must be posted at the jobsite. Specific wording can be found in parts c and d of this section. The exact Phrases that must be posted are: “If you would like to obtain a copy of the Stormwater Pollution Prevention Plan (SWPPP) for this site, contact the EPA Regional Office at [include the appropriate CGP Regional Office contact information found at https://www.epa.gov/npdes/contact-us-stormwater#regional]” and the following “If you observe indicators of stormwater pollutants in the discharge or in the receiving waterbody, contact the EPA through the following website: https://www.epa.gov/enforcement/report-environmental-violations ”
2.2.14	There are specific requirements for stabilization depending on the project’s disturbed acreage. For sites, or portions of sites where activities have permanently ceased or will be temporarily inactive, the requirements can be summarized as follows: <ul style="list-style-type: none"> • If the site disturbs more than five acres, the site must be stabilized within 7 days. • If the site disturbs five acres or less, the site must be stabilized within 14 days. <p>The site could ultimately disturb more than five acres, but keep the disturbance at any one time to five acres or less and qualify for the 14-day stabilization requirement. The SWPPP should include an explanation of which stabilization criteria applies to the site.</p>
2.3.3e	Construction and domestic waste containers and building materials storage must have a lid, cover (e.g., a tarp, plastic sheeting, temporary roof), or similarly effective means to minimize discharge of pollutants (e.g., secondary containment) Waste container lids must be closed when not in use and at the end of the business day. In addition to including this practice on-site, the BMPs description in the SWPPP for waste management and material storage and other similar BMPs should include a description of the covers or other similarly effective means.
2.3.4a	Covers for washout areas are not required, but the container must be sized to not overflow from precipitation events.

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CGP Section	Summary
3.2	Special requirements for discharges to waters that are impaired for polychlorinated biphenyls (PCBs). Currently, there are no waters in the State of Idaho that are impaired for PCBs, however this could change.
4.2.2	While the options for inspection schedules are the same as the 2012 permit, the following was added for extra inspections due to storm events: “or the occurrence of runoff from snowmelt sufficient to cause a discharge”. In summary, the site must be inspected when snow melts and runs off the site as well as after 0.25 inches of precipitation.
4.4.1a	Reducing inspections to once per month after the site has been temporarily stabilized is still an allowable reduction in inspection frequency, however, now the allowable reduction is worded as follows. “You may reduce the frequency of inspections to twice per month for the first month, no more than 14 calendar days apart, then once per month in any area of your site where the stabilization steps in 2.2.14a have been completed.”
4.4.3b	Reducing inspections during frozen conditions is still allowed and the guidelines are the same as the 2012 permit. Section 4.4.3b describes what to do if the site is frozen but construction activities are still active at the site. A reduction is still allowed, but you must first document that the site is likely (based on historical weather patterns) to remain frozen for 3 months or more.
6.3	The new permit specifically requires members of the SWPPP’s “stormwater team” to be trained. The SWPPP should include documentation of training for everyone you list in the SWPPP as being part of the stormwater team. Section 6.3 describes the minimum requirements for this training.
7.2.3	The contents of the “Nature of Construction Activities” section is more explicit but generally unchanged. There are two new requirements. First, for linear sites the SWPPP must list the length of the project in miles in addition to the area in acres. Second, include business days and hours the project will be active.
7.2.4	The new CGP requires that all waters within and one mile downstream of the site’s discharge point must be included on the site map. The map must also include the type and extent of pre-construction cover on the site (e.g., vegetative cover, forest, pasture, pavement, structures etc.) For existing sites, you will need to add these requirements to your site maps or develop a new site map. For new projects, you will need to make sure these items are included on the site maps prior to submission of the SWPPP to ITD for review. Most of the site map requirements from the 2012 CGP are also requirements of the 2017 CGP.
9.7.1c	For receiving waters that have not been assessed by IDEQ’s most recent integrated report, contact DEQ for assistance before filing your NOI. The most recent publicly available report is from 2012 but DEQ has unpublished data for 2014 that they will share on request. This section requires you to request the information.

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CGP Section	Summary
9.7.1	<p>You are only required to take turbidity measurements if your discharge is creating a plume. You must <u>continuously</u> take turbidity readings if the plume is visible. The monitoring interval for continuous monitoring is not defined. Monitoring is no longer only required at water bodies impaired for sediment; the requirement to monitor any visible plume applies to all waters of the State. You should be prepared to monitor at any project that has the potential for creating a plume.</p> <p>We remind you that projects that include work within the Waters of the United States may have a project specific 401 water quality certification. These project specific water quality certifications are usually part of a 404 permit. Project specific water quality certifications often include specific monitoring schedules that are more stringent than the requirement in the CGP.</p>
Page A-2	The “Common Plan of Development” definition is more specific. See specific language in CGP Appendix A.
Page C-1	The “Low Erosivity Waiver” is now called the “Rainfall Erosivity Waiver”
Appendix J	<p>The approved NOI application form includes three new questions:</p> <ol style="list-style-type: none"> 1. Type of construction site, single family residential, commercial, industrial, etc. 2. Will there be demolition of any structure built or renovated before January 1, 1980? 3. Was the pre-development land use used for agriculture?
Appendix L	EPA has added a suggested format for notifying EPA about proposed use of cationic treatment chemicals. If you plan to use treatment chemicals you should use the form to submit notification to the EPA prior to submitting you NOI.

I understand that the preceding changes are required for compliance with the EPA’s Construction General Permit. As a certified Idaho Transportation Department NPDES Stormwater Inspector, I have read, understand, and will implement the preceding changes on all ITD construction sites that require coverage under the CGP.

Print Name

IQP Qualification / Certification Number

Signature

Date