

9.0 PERFORMING INSPECTIONS

The inspector has a unique and vital position on the construction site. His experience and observations help protect streams and other natural resources from negative impacts from construction sites. This section covers an inspector's role, as well as guidance on the process of inspections and inspection documentation.

9.1 The Role of the Inspector

The TN Construction General Permit defines the EPSC inspector as follows:

An inspector is a person that has successfully completed (has a valid certification from) the "Fundamentals of Erosion Prevention and Sediment Control Level I" course or equivalent course. An inspector performs and documents the required inspections, paying particular attention to time-sensitive permit requirements such as stabilization and maintenance activities. An inspector may also have the following responsibilities:

- a. Oversee the requirements of other construction-related permits, such as Aquatic Resources Alteration Permit or Corps of Engineers permit for construction activities in or around Waters of the State;*
- b. Update field SWPPPs;*
- c. Conduct pre-construction inspection to verify that undisturbed areas have been properly marked and initial measures have been installed; and*
- d. Inform the permit holder of activities that may be necessary to gain or remain in compliance with the CGP and other environmental permits.*

The inspector must be knowledgeable about all construction related permits on the site, as well as being knowledgeable about stormwater pollution prevention practices. Figure 9-1 below depicts an inspector's role in understanding regulations. The EPSC inspector should also be familiar with construction methods and should know when to make a recommendation onsite or to involve the designer.

An inspector's primary responsibilities are to document site conditions and keep the field SWPPP current. Therefore, an inspector must have the technical expertise in stormwater pollution prevention. In addition, the inspector must be able to deal effectively with people. The inspector must be able to communicate clear guidance to contractors, engineers, and developers to maintain compliance at a site. **It is NOT the responsibility of the inspector to maintain or achieve compliance at a construction site – rather, it is simply to notify the permit holder of the measures needed to stay in compliance.**

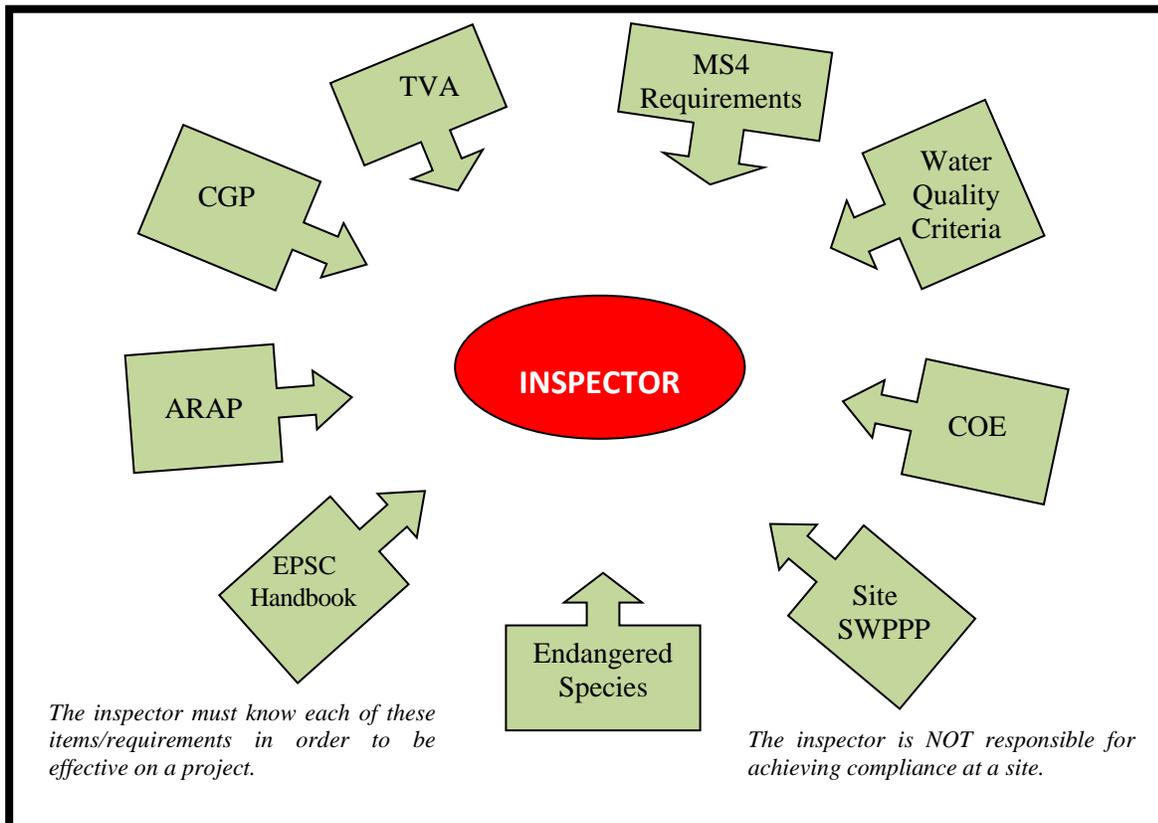


Figure 9-1 The Role of the Inspector: Understanding Requirements

9.2 Performing the inspection

The inspection process should be founded on the following principles of erosion prevention and sediment control:

- Limit the disturbed area
- Phase the construction project
- Protect the soil surface from erosion
- Manage runoff volume and keep velocities low
- Capture sediment near the source
- Maintain the stormwater management system
- Keep sediment on the site

The EPSC inspector must be familiar with these principles and know how to apply them on the construction site.

Prior to beginning the inspection, the inspector should fully familiarize himself with the SWPPP and all associated permit requirements. Know the locations of all of the outfalls, the areas that are not to be disturbed and the phase of construction. Identify the natural resources within or adjacent to the project. The inspector's goal should be to keep the disturbed area minimized to control erosion and minimize maintenance.

Inspection Guidance

- ✓ Participate in the pre-construction inspection and/or meetings. Environmentally sensitive areas, ARAP boundaries, and areas to be left undisturbed should be identified and marked in the field prior to beginning land disturbing activities.
- ✓ Begin the inspection by first coordinating with the contractor and the developer or site operator. Performing the inspections with the contractor and the site operator ensures good communication between all parties. Take a copy of the latest field SWPPP especially on larger sites, to better understand the site and the design intent. This is particularly helpful when making a recommendation for insufficient measures because the contractor may have simply not installed exactly what was called for in the plan.
- ✓ Walk the perimeter of the site on the downstream side of measures and the disturbed area. Pay particular attention to outfalls and areas where runoff discharges from the construction site. Verify that buffers and other undisturbed areas have not been damaged by equipment or storage practices. Note sediment deposition beyond the permitted limits, in streams, or wetlands. Note the conditions of all EPSC measures. Look for evidence of erosion beginning.
- ✓ Estimate the total disturbed acreage. Note areas that have been permanently or temporarily stabilized. Note germination or evidence of erosion. Verify that areas to remain undisturbed have not been disturbed. Indicate where construction activities have temporarily or permanently ceased and note in the inspection report that these areas must be stabilized within 15 days.
- ✓ Inspect all controls interior to the site, including erosion prevention measures, sediment control measures, and pollution prevention controls. Where controls need maintenance, repair, or to be installed, indicate this on the EPSC inspection report. Note that the site operator must complete the identified items before the next rain event or no later than 7 days after the date the items were identified to remain in compliance. Identify potential failures and site problems, not simply failures after they have occurred.
- ✓ Before recommending corrective actions, understand *why* the corrective actions are needed. Is the BMP the right BMP for the location and drainage area? Was it installed correctly? Was it maintained correctly? Determine the answers to these questions prior to recommending corrective actions related to BMPs.
- ✓ Document changes on the field SWPPP. Indicate where measures have been removed or installed. Also indicate areas that have been permanently stabilized.
- ✓ Once construction has been completed, the site must be permanently stabilized. All areas disturbed by construction must be finally stabilized with a permanent groundcover sufficient to restrain erosion. Final stabilization is defined in the CGP as a uniform perennial vegetative cover with a uniform density of at least 70 percent of the native (preferably) background vegetative cover for the areas disturbed by construction and areas not covered by permanent structures, and all slopes and channels have been permanently stabilized. Once final stabilization has been achieved, the site operator can submit the Notice of Termination.

- ✓ Communicate the inspection findings to the permit holder and contractor, including recommendations to maintain compliance with existing permits, environmental requirements, and the site SWPPP. When site conditions warrant, inform the permit holder of the need to contact the SWPPP designer for changes or modifications to major components of the SWPPP. Discuss construction staging and scheduling with the contractor and permit holder so you are aware of the next construction activities to be performed onsite.

9.3 Documentation

Complete an inspection report for all inspections. The CGP requires inspection be performed at least twice a week, 72 hours or more apart. Document the findings of the inspection fully in the report, and provide a copy to the site operator and the contractor. Document that the rain gage has been read and rainfall recorded on a daily basis or that a reference site has been used to document rainfall. The inspector should also document that all records are being completed and maintained per the TN CGP.

It is highly recommended that inspectors use photo documentation to clearly convey recommendations to the site operator and contractor. Photos also document site conditions over time to support the inspection report findings when the site is audited by TDEC or other regulators. Some inspectors have even walked streams prior to a project with a video camera to more comprehensively document conditions before construction begins.

As noted above, an inspection report must be completed for all inspections to document the inspection findings. This documentation should include the rainfall since the last inspection. Photos taken during each inspection should be catalogued for reference during site audits.