

UNM CONSTRUCTION SITE MANAGEMENT AND INSPECTION PROGRAM

Prepared by UNM Safety & Risk Services Department

INTRODUCTION:

In compliance with provisions of the Clean Water Act, construction activities that will disturb one or more acres of land or will disturb less than one acre of land but are part of a common plan of development or sale that will ultimately disturb one or more acres of land, prior to commencing construction activities, are required to submit a Notice of Intent (NOI) to the EPA and to prepare and comply with a Stormwater Pollution Prevention Plan (SWPPP). Construction activities that will disturb less than one acre of land are not required to submit a NOI. However, the University of New Mexico (UNM) requires that such projects develop a SWPPP specific to the construction site and adhere to the SRS Contractor Requirements with regards to stormwater pollution control.

PURPOSE

1. Standardize procedures for conducting, documenting and tracking inspections, for stormwater compliance at UNM construction sites.
2. Establish which personnel are responsible for performing and documenting and tracking stormwater compliance inspections.
3. Establish areas of responsibility when it comes to compliance with UNM's NPDES permit as it relates to construction sites.

SCOPE

- Construction sites with disturbed area less than one acre.
- Construction sites with disturbed area greater than one acre.

DEFINITIONS

Best Management Practices (BMPs) means activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants to waters of the United States. BMPs also include treatment requirements, operating procedures and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Storm Water Pollution Prevention Plan is a written plan that documents the selection and implementation of BMPs for a particular facility or construction project.

RESPONSIBILITIES

UNM Project Managers

- Include SWPPP specifications in contractor bids and contracts. Ensures the contractors develop and submit for their approval a site specific SWPPP.
- Provide a copy of the SWPPP to SRS for review
- Ensure that contractor complies with the SWPPP

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- Review contractor SWPPP and report discrepancies to the Project Manager.
- Inspect construction sites to ensure compliance with SWPPP and environmental laws and regulations.
- Report discrepancies to the UNM Project Manager.

Contractor

- Develop a site specific SWPPP
- Develop and implement strategies which include a combination of structural and/or nonstructural BMPs.
- Develop and incorporate post construction BMPs into the project.
- Perform ongoing storm water pollution prevention inspections throughout the period of construction.
- Take corrective action whenever necessary to prevent storm water or other runoff from the construction site into the stormwater system or gutters and culverts leading to that system.

CONSTRUCTION SITE INSPECTIONS/DOCUMENTATION

The Safety & Risk Services Department is responsible for completing construction site inspections and follow-up inspections.

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- Use the attached Storm water Compliance Inspection checklist.
- Take photos of identified deficiencies.
- Email a PDF copy of the completed inspection checklist and photos to the UNM Project Manager and request that any deficiencies be addressed immediately.

Frequency of inspections:

- Conduct inspections at least monthly, and within 24 hours of a storm event.
- Consider current and past SWPPP compliance. If there is a history of noncompliance then the site will be inspected more frequently until compliance is met.
- Conduct routine inspections during construction activity (at the minimum frequency identified above). Use the first section of the inspection checklist.
- Conduct a final inspection of the site once the contractor has completed the project, or where applicable, when contractor has filed a Notice of Termination (NOT) with the EPA. Use the second section of the inspection checklist.

INSPECTION LOG

Update the inspection log after each inspection. The inspection log should include a list of construction sites, scheduled inspection dates, and other SWPPP related information. All construction sites are to be included in the log. The inspection log is attached.

Priority construction sites are identified using the following criteria:

- Current and past SWPPP compliance.
 1. If owner operator has a history of negligence then the site will be inspected more frequently until compliance is met
- Sites greater than 1 acre and sites where there is active construction during monsoon season and during high wind season should be given priority.

ENFORCEMENT ACTION

The UNM project manager is responsible for enforcement. They can seek damages or withhold payment to contractors.

DOCUMENTATION

- SRS personnel conducting inspections are responsible for updating the SWPPP Inspection log and for storing all SWPPP inspection reports, photos and other documentation electronically on the SRS share drive.
- Records of inspections and enforcement shall be kept for 5 years or until construction is completed, whichever is longer.