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**Standard Operating Procedure for Construction Site  
Management and Stormwater Inspection**

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**UNIVERSITY OF NEW MEXICO**  
**Department of Environmental Health and Safety**



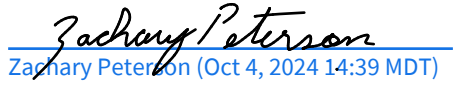
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Casey Hall  
Director



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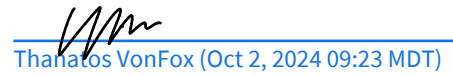
Melissa Terry  
Chemical Hygiene Officer

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Zachary Peterson (Oct 4, 2024 14:39 MDT)

Zachary Peterson  
Manager, Safety

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Thanatos VonFox (Oct 2, 2024 09:23 MDT)

Thanatos VonFox  
Unit Administrator



## ACRONYMS & DEFINITIONS

EHS	Environmental Health and Safety
NPDES	National Pollutant Discharge Elimination System
BPMs	Best Management Practices
NOI	Notice of Intent
NOT	Notice of Termination
SWPPP	Stormwater Pollution Prevention Plan

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## 1. PURPOSE

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 are required to submit a Notice of Intent (NOI) to the EPA and to prepare and comply with a Stormwater Pollution Prevention Plan (SWPPP) , prior to commencing construction activities.

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 EHS Contractor Requirements with regards to stormwater pollution control.

## 2. SCOPE

Construction sites on UNM owned property with disturbed area, i.e. exterior ground surface.

## 3. CONSTRUCTION SITES ON UNM OWNED PROPERTY WITH DISTURBED AREA, I.E. EXTERIOR GROUND SURFACE. RESPONSIBILITIES

### 3.1. UNM Project Managers

- 1) 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 EHS for review.
- 2) Ensure that contractor complies with the SWPPP.

### 3.2. Environmental Health & Safety Department

- 1) Review contractor SWPPP and report discrepancies to the Project Manager.
- 2) Inspect construction sites to ensure compliance with SWPPP and environmental laws and regulations.
- 3) Report discrepancies to the UNM Project Manager.
- 4) Standardize procedures for conducting, documenting and tracking inspections, for stormwater compliance at UNM construction sites.
- 5) Establish which personnel are responsible for performing and documenting and tracking stormwater compliance inspections.
- 6) Establish areas of responsibility when it comes to compliance with UNM's NPDES permit as it relates to construction sites.

### 3.3. Contractor

- 1) Develop a site specific SWPPP
- 2) Develop and implement strategies which include a combination of structural and/or nonstructural BMPs.
- 3) Develop and incorporate post construction BMPs into the project.
- 4) Coordinate with EHS for stormwater inspections.
- 5) Perform ongoing stormwater pollution prevention inspections throughout the period of construction.
- 6) 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.

## 4. CONSTRUCTION SITE INSPECTIONS/ DOCUMENTATION

The EHS Department is responsible for completing construction site inspections and post construction site inspections.

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

## 5. INSPECTION FREQUENCY

- 1) Conduct inspections monthly, and within 24 hours of a storm event resulting in .25 inches or more.
- 2) 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.
- 3) Conduct routine inspections during construction activity (at the minimum frequency identified above). Use the first section of the inspection checklist.
- 4) 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.

## 6. INSPECTION TRACKING

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 online tracker. The inspection log can be found on Monday.com.



Priority construction sites are identified using the following criteria:

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

## **7. DOCUMENTATION**

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

## 8. STORM WATER COMPLIANCE INSPECTION ATTACHMENT

<b>PROJECT NAME:</b>				
<b>STORM WATER COMPLIANCE INSPECTION – DURING CONSTRUCTION</b>				
		<b>YES</b>	<b>NO</b>	<b>NA</b>
1	The contractor has posted the EPA Permit or the Notice of Intent form and the name of the site contact person at the entrance to the construction site.			
2	The contractor has provided a copy of the completed Notice of Intent and the Storm Water Pollution Prevention Plan (SWPPP) to UNM.			
3	An up to date copy of the SWPPP is available on site.			
4	The Contractor has adhered to the sequence of soil disturbance activities identified in the SWPPP.			
5	The Contractor has been instructed in the emergency procedures to follow in the event of a hazardous material release, if required.			
6	The Contractor has recorded the dates of major construction activities involving grading, stabilization, and work suspension.			
7	The Contractor has scheduled inspections of storm water control measures and discharge points; and the inspections are being performed by qualified personnel at the frequency stated in the SWPPP.			
8	The Contractor has filed completed, signed inspection reports with the SWPPP that identify the dates of inspection, weather conditions, findings, and corrective actions.			
9	When an inspection reveals a requirement to amend the SWPPP, the Contractor revises the SWPPP and provides the amended SWPPP to UNM within seven days.			
	<b>Site Checks:</b>			
10	Have disturbed areas been stabilized?			
11	Are storm drains protected?			
12	Are material stockpiles stabilized or isolated?			
13	Is sediment or debris visible at drains or discharge locations?			
14	Has sediment or loose gravel from the site entrance gotten on the street?			
15	Are any oils or chemicals stored near storm drains, discharge locations, or surface waters?			
16	Are runoff control measures (filter fabric, hay bales, silt fencing, etc.) being adequately maintained?			
17	Are any sediment ponds / traps silted to 1/4 capacity or more?			
	Additional Comments / Observations:			

	Inspector's Name:
	Inspection Date/Time:
	Weather Conditions:
	Inspector's Signature:

<b>STORM WATER COMPLIANCE INSPECTION – POST CONSTRUCTION FINAL</b>				
		<b>YES</b>	<b>NO</b>	<b>NA</b>
18	Contractor has completed all soil disturbing activities at the site.			
19	All storm water discharges associated with construction activity have been eliminated.			
20	The Contractor has removed all temporary erosion and sediment control measures, or will provide for their removal at the appropriate time as identified in the SWPPP.			
21	The Contractor has achieved final stabilization of all areas of the construction site for which he is responsible, where soil disturbing activities have been performed.			
22	Contractor has completed and submitted a Notice of Termination (NOT) to EPA within 30 days after:			
	a Final stabilization of all portions of the site for which the Contractor is responsible; or			
	b Another Operator has assumed control of all areas of the site that have not been finally stabilized; or			
	c Coverage under an alternate NPDES permit has been obtained.			
23	The Contractor has provided a copy of the Notice of Termination to UNM			
Additional Comments / Observations:				
Inspector's Name:				
Inspection Date/Time:				
Weather Conditions: Overcast.				
Inspector's Signature:				











# Construction Site Management and Stormwater Inspection Program - R1

Final Audit Report

2024-10-04


Created:	2024-10-02
By:	Thanatos VonFox (vgough@unm.edu)
Status:	Signed
Transaction ID:	CBJCHBCAABAA2CcaSXlh3_OjzFuFbkRmVPPwSvndQNoL

## "Construction Site Management and Stormwater Inspection Program - R1" History

-  Document created by Thanatos VonFox (vgough@unm.edu)  
2024-10-02 - 3:20:24 PM GMT- IP address: 129.24.33.82
-  Document emailed to Zachary Peterson (zpeterson@unm.edu) for signature  
2024-10-02 - 3:21:59 PM GMT
-  Document emailed to Thanatos VonFox (vgough@unm.edu) for signature  
2024-10-02 - 3:22:00 PM GMT
-  Document emailed to Melissa Terry (melterry@unm.edu) for signature  
2024-10-02 - 3:22:00 PM GMT
-  Document emailed to Casey Hall (cbhall4@unm.edu) for signature  
2024-10-02 - 3:22:01 PM GMT
-  Document e-signed by Thanatos VonFox (vgough@unm.edu)  
Signature Date: 2024-10-02 - 3:23:29 PM GMT - Time Source: server- IP address: 129.24.33.82
-  Email viewed by Casey Hall (cbhall4@unm.edu)  
2024-10-02 - 3:37:58 PM GMT- IP address: 104.47.57.126
-  Document e-signed by Casey Hall (cbhall4@unm.edu)  
Signature Date: 2024-10-02 - 3:38:11 PM GMT - Time Source: server- IP address: 174.28.58.18
-  Email viewed by Melissa Terry (melterry@unm.edu)  
2024-10-02 - 4:29:38 PM GMT- IP address: 73.26.190.131
-  Document e-signed by Melissa Terry (melterry@unm.edu)  
Signature Date: 2024-10-02 - 4:37:24 PM GMT - Time Source: server- IP address: 73.26.190.131

 Document e-signed by Zachary Peterson (zpeterson@unm.edu)

Signature Date: 2024-10-04 - 8:39:44 PM GMT - Time Source: server- IP address: 174.28.81.39

 Agreement completed.

2024-10-04 - 8:39:44 PM GMT