

Memorandum

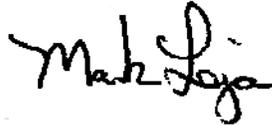
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To: DEPUTY DISTRICT DIRECTORS, Construction
DEPUTY DIVISION CHIEF, Structure Construction
CONSTRUCTION MANAGERS
SENIOR CONSTRUCTION ENGINEERS
RESIDENT ENGINEERS
CONSTRUCTION STORMWATER COORDINATORS

Date: March 9, 2010

File: Division of Construction
CPD 10-2

From: MARK LEJA
Chief
Division of Construction



Subject: Consistent Implementation of Caltrans Stormwater Management Program

Between October 5 and October 22, 2009, the Environmental Protection Agency (EPA) Region 9 conducted an audit, reviewing the implementation of Caltrans' stormwater quality program in the North Region and District 4.

The EPA noted that, despite the existence of numerous guidance documents and associated record keeping forms, the audited districts exhibited significant variations in program implementation methods, including the following examples:

- Implementation of Best Management Practices (BMPs) not approved by the resident engineer or not included in the *Storm Water Pollution Prevention Plan (SWPPP)*.
- BMPs not implemented in accordance with Appendix D of the *Caltrans Storm Water Management Plan (May 2003) (SWMP)* or the Caltrans standard special provisions.
- Inadequate enforcement of the contract conditions or overall implementation of the approved SWPPP.
- Lack of adequate site inspection and enforcement.
- Inadequate documentation of project inspections.
- Not maintaining the inspection documentation.

In response to the audit identified deficiencies and recent enforcement actions and compliance evaluations, the Division of Construction has developed the following training.

1. Stormwater Refresher Training (LMS# 101121)

This course complies with the Caltrans Storm Water Permit (CAS000003) Provision J.1.b and Section 6.2.2 of the SWMP, which requires reinforcing and refreshing training.

Description: Refreshes students on the main topics of construction stormwater training courses. It focuses on and summarizes main topics of recent enforcement actions, compliance inspection, evaluations, and findings. The topics include potential pollutant sources and impacts, regulations, BMPs, inspection, maintenance, contract administration, dewatering operations, sampling and analysis, stormwater pollution prevention plans, and water pollution control program review.

Target Audience: Resident engineers, SWPPP inspectors, and other construction staff who have already had the existing construction stormwater training courses.

The course will be available in March 2010. The district construction training coordinators will announce the specific dates.

2. Stormwater Best Management Practices Training Videos

These are a series of self-paced interactive training videos designed to improve construction staff understanding of the construction stormwater program, temporary construction stormwater BMPs, and construction stormwater compliance activities.

Description: The videos include a brief introduction to stormwater regulations and discuss water pollution control requirements for construction sites. For BMPs commonly found on construction sites, these videos show common inadequacies and provide discussion about proper BMP installation and maintenance. Chapters within the videos cover sediment control practices, tracking control practices, material and waste management practices, stormwater pollution prevention plans, and construction site record keeping and reports.

Target Audience: Caltrans construction staff and contractor employees involved in stormwater BMP installation and maintenance.

The videos will be available in March 2010 and posted under “Interactive Training Videos” on the Construction Stormwater Training webpage:

<http://www.dot.ca.gov/hq/construc/stormwater/interactive.html>

The SWMP describes how Caltrans will comply with Caltrans Storm Water Permit (CAS000003) requirements by providing pertinent information about stormwater quality management to its employees and contractors. These two training efforts follow the Caltrans strategy for training its employees by developing and presenting focused training courses targeted to specific topics and groups.

To improve statewide consistency in the implementation of Caltrans Storm Water Permit (CAS000003), all construction staff should receive the stormwater refresher training by March 1, 2011. Project staff can use the stormwater best management practice training videos as a refresher on proper BMP installation and maintenance. SWPPP inspectors should be required to refresh their knowledge when project stormwater reviews show deficiencies not identified by project inspections.

For additional information or assistance, please contact Hamid Hakim, Division of Construction, at hamid_hakim@dot.ca.gov or (916) 653-7289.