

Wyoming Department of Environmental Quality
WYPDES Storm Water Inspection
“What to Expect When You’re Inspected”



Industrial, Construction, and Mineral Mining Storm Water Inspections:

Storm water inspections encompass activities that could impact storm water (precipitation or snowmelt) entering waters of the state. A facility may be required to get authorization to discharge storm water under one of these permits depending on the activities and or materials stored at the facility. For the most part storm water inspections under any one of the storm water permits are very similar. However, there are some slight differences in focus based on what permit the facility is authorized under.

Inspections of facilities covered by a storm water permit consists of two parts that will be combined into one inspection report, a record’s review and a field inspection. During an inspection, the following items are checked:

Records Review:

1. Permits and Authorization:
 - a) Is the facility covered under a storm water permit?
 - b) Are copies of the permit and Letter of Authorization (LOA) located onsite and available for review?
 - i. A copy of the LOA needs to be maintained on site at the facility. This is a single sheet that gives the facility’s specific authorization number, date when the authorization is in effect and the date when the authorization expires.
 - ii. The permit is a separate document from the LOA. The permit is approximately 30-40 pages long and gives all of the rules a facility must comply with. Copies of the permit can be obtained from the DEQ website (<http://deq.wyoming.gov/wqd/storm-water-permitting/resources/construction-general-permits/>), and a copy must be maintained at the facility.
2. Storm Water Pollution Prevention Plan (SWPPP): The SWPPP is a document prepared by the permittee that describes how storm water will be managed onsite. The SWPPP is developed in accordance with the permit. Essentially this document tells inspectors what the company has agreed to do. This document is required by the permit and a facility must follow the SWPPP.
 - a) The SWPPP must be available for review, contain all items required in the permit, and be up to date with current site conditions.

- b) The Permittee must have a SWPPP site map that is available, up to date, and meets permit requirements.
3. SWPPP Self-monitoring Inspections
- a) The facility must conduct and document SWPPP self-monitoring site inspections. The facility must maintain 3 years of inspection records onsite. Inspections must be conducted at a frequency that meets or exceeds the permit requirements, as outlined in the SWPPP.
 - i. A facility must indicate an inspection frequency in the SWPPP that complies with the permit. If the SWPPP indicates that inspections should occur on a more frequent basis than required by the permit the facility will be held to the inspection schedule in the SWPPP (the SWPPP is an enforceable part of the permit).
4. Sampling Data and Discharge Monitoring Reports: *This is NOT required for all permittees.* (The facility's SIC code, which describes the activities that take place onsite, will determine if sampling is required.)
- a) Are all sampling data, Discharge Monitoring Reports (DMRs), and chain of custody (COC) forms available for review?
 - i. Some facilities covered under the Industrial General Storm Water Permit (IGP) and the Mineral Mining Storm Water Permit are required to sample storm water discharged from the facility and have the samples analyzed to ensure that the storm water is not being contaminated by the activities at the facility. A facility with this requirement must submit a DMR on an annual basis that summarizes the results of the discharge, even if the facility is not discharging water off site. The DMRs and the corresponding lab reports with COC forms for the past three years must be available to the inspector.

The most common violations noted for the records portion of a storm water inspection are:

1. Not having an authorization to discharge.
 - a) This is very common especially in construction projects. If the site is between 1 and 5 acres the contractor must maintain a SWPPP with a site map, Best Management Practices (BMPs), and conduct self-monitoring inspections that follow the small construction permit. If the site is over 5 acres the contractor must do all of the above and submit a notice of intent (NOI) and obtain authorization by the issuance of a LOA.
2. Having an incomplete or out-of-date SWPPP.
 - a) Make sure the SWPPP meets the permit requirements. If you are unsure about the SWPPP requirements there are SWPPP templates on the DEQ website that can be used to guide you.

- b) Update the SWPPP and SWPPP site map any time changes take place onsite. If there is a change to individuals responsible for the SWPPP, site management, or inspections make sure the SWPPP is updated. Any time a BMP is removed, moved, or added, the change is noted on the site map.
 - c) Make sure the SWPPP and all self-monitoring inspection reports are SIGNED and CERTIFIED.
3. Self-monitoring Inspections do not meet requirements.
- a) Make sure that you are following the inspection schedule outlined in your SWPPP and double check to make sure that your inspection schedule meets the minimum frequency outlined in the permit.
 - b) Document all self-monitoring inspections. If you do not document it, it did not happen.
 - c) Make sure your self-monitoring inspection report contains a compliance statement.
 - d) Make sure the self-monitoring inspection report is DATED, SIGNED, and CERTIFIED.

Field Inspection

During the field inspection portion, the inspector will look for how storm water flows across the property, where the water would leave the property, and any areas where there is a risk of contaminating storm water through onsite activities. Generally the inspector will want to inspect the boundary of the project or facility, areas where significant materials are exposed to storm water and other areas where activities onsite could potentially contaminated storm water. The inspector will look at what BMPs are in place to prevent storm water from being contaminated, and if the management practices are the practices that are indicated in the SWPPP and on the SWPPP Site Map.

Common storm water contaminants are sediment from disturbed areas of the site, stockpiles of materials (i.e. sand, salt, gravel, topsoil and coal), petroleum products from equipment fueling and maintenance, bulk chemicals stored onsite, and trash from activities onsite. During the inspection the inspector will look for signs of:

1. Erosion

Erosion can happen from wind, water, humans, equipment, and gravity. Signs of erosion include blowing dust, rills or depressions from sediment being moved by water, slumping or landslides. The best protection against erosion is to protect vegetative cover, but there are other devices that can be used to reduce or prevent erosion such as:

- a) Straw bales, straw waddles, silt fence, etc. to slow water down on slopes.
- b) Diverting the water using berms, water wings, and other water control devices.

- c) Use of snow fence, tackifiers, and water to keep dust from blowing.
- d) Using gravel, heavy rock, mulch, soil roughening, tackifiers, erosion control matting, or crimping in straw to reduce erosion.

During an inspection the inspector will look for signs of erosion to see if the erosion management devices are working effectively. They will also check erosion control devices to see if they are being installed and maintained properly.

2. *Sedimentation*

Sedimentation is where sediment has been transported by wind, water, humans, equipment or gravity from one spot and accumulates at another location. All sediment from a permitted facility needs to stay onsite and not be transported off site. Many of the erosion control devices like straw bales/ waddles, silt fence, etc. also trap sediment. The inspector will be looking for signs that sediment is leaving the facility and at the sediment control devices to make sure they are installed and maintained properly. This includes sediment tracked off site by vehicles and equipment. If sediment leaves the site due to BMP failure it is the responsibility of the permit holder to recover the sediment within a reasonable time period. If sedimentation is caused by vehicle tracking the sediment must be recovered within 24 hours.

3. *Storage of Significant Materials*

Bulk fuels and chemicals need to be stored and maintained in such a way that prevents those pollutants from coming into contact with storm water. If the facility is required to maintain a Spill Prevention Control and Countermeasures (SPCC) Plan that plan may be referenced in the SWPPP, and the facility must be managed according to the specifics in the SWPPP and the SPCC. The inspector will look at bulk fuel and chemical storage areas to ensure that there is adequate secondary containment to contain any spills, that the secondary containment is functional and maintained, that the secondary containment is large enough to contain a spill, and that all significant materials are stored in proper secondary containment. The inspector will also look to make sure that onsite spill kits are present and adequately stocked.

4. *Stockpile Areas*

Stockpiles of topsoil, salt, sand, gravel, coal, etc. need to be managed in such a way that fines and sediment are not being transported by storm water or wind into waters of the state. Erosion and sediment control devices need to be used around stock piles to contain the materials.

5. *Good Housekeeping*

Good Housekeeping encompasses a variety of activities and the inspector is looking to see if the facility appears tidy and well maintained. The inspector is looking to see if trash is contained appropriately, if all sanitary facilities are located and secured properly, if there is an appropriate and designated concrete washout area at the construction sites, is there

evidence of leaks or spills onsite that have not been cleaned up, etc. At a facility that is not tidy and well maintained the chance of pollutants entering waters of the state is more likely.

The most common violations noted during the field inspection are:

1. Visible and Measurable Erosion due to a lack of or ineffective BMPs
2. Sediment tracked or discharged off site.
3. Improperly installed and maintained BMPs.
4. Lack of proper secondary containment.