

INSPECTIONS – YOURS
PAPERWORK – YOURS



Inspections – Yours

Checking up on your handiwork

Permittee Self-Inspections



- Part 8 covers inspections
- Minimum of two/year
 - ▣ Alternative inspection schedules are available where sites are essentially unstaffed
 - ▣ Alternative schedule requires at least an annual inspection

Who has to inspect?



- A qualified person
 - ▣ A person who is familiar with the requirements of the SWPPP, permit conditions and the proper implementation and maintenance of all implemented BMPs
 - ▣ In other words, someone who can recognize problems, can address those problems or knows who to contact to see that the problems are resolved
 - ▣ No official certification

A suggestion



- Train as many “field” people as you can to recognize what a problem is and to know who to contact
 - ▣ They don’t have to do formal inspections, but they can identify small issues before they grow into big issues

Scope



- Visually inspect all areas contributing storm water from areas associated with industrial activity
- Determine if current BMPs are
 - adequate
 - adequately maintained
 - addressing the pollutants of concern
 - needed maintenance
 - additional BMPs
 - modification to existing BMPs

Document a Problem – Really?



- Yes, but also document the steps taken to resolve the issue, in fact, this is required
- Update the SWPPP as necessary in response to inspection findings

Inspections in general



- Write it down!
 - must document inspection
 - must certify “I certify under penalty of law...”
 - must be signed by VP or higher or designated signatory
 - We will look for this on our inspection.....

In summary



- Review part 8
- Follow part 8
- Keep the paperwork straight – it is the prime area for enforcement



Paperwork

Getting things done and staying out of trouble

The SWPPP



- This is the pillar of the permit
- It must follow Part 7
- It must be updated to current on-the-ground conditions
- It must be fully implemented and, when implemented, must successfully minimize offsite pollution
 - ▣ If it doesn't adequately minimize pollution it must be modified

The SWPPP



- It must be certified and signed
- In most cases it must be onsite
- This is the first thing DEQ (and EPA) asks for when we come onsite for an inspection
- The best ones I've seen are concise, clear, understandable
- Expect it to have notes and penciled-in changes

Inspection Reports



- This is the second thing we ask for when we (or EPA) shows up on site
- Keep with the SWPPP
- Must be certified and signed
- Must be complete
- Have chain-of-custody documents and lab reports with your DEQ reporting forms

Sampling Records, if You Must



- Have copies of your submitted reports
- Have chain-of-custody documents and lab reports with your DEQ reporting forms
- As with all documents made for SW permits, the reports must be certified and signed

Renewals



- Required every five years
- Renewal forms
 - ▣ Correct as necessary and return
 - ▣ A new letter of authorization will wing its way to you

Change of ownership



- Notice of Transfer and Acceptance (NOTA)
 - Completed and signed by both parties
 - Submit completed form
 - Confirming correspondence is always done
 - New LOA and cover letter to new permittee
 - Copy of cover letter to previous permittee
 - If you don't see correspondence in a reasonable time CONTACT US. Something may be off track.

Termination of Industrial Activity



- Notice of Termination (NOT)
 - industrial activity has ended
 - “significant materials” have been removed or are under cover
 - a letter confirming termination is always sent. If you don't see a letter your authorization has NOT been terminated. CONTACT US to find out why.

Reporting Spills



- Certain spills must be reported to DEQ (permit 2.12) or Chapter 4 of the Wyoming Water Quality Rules and Regulations
- Report to 307-777-7781
 - ▣ Joe Hunter, spill coordinator
- 25 gallons refined product, 10 bbls crude, sheen or visible deposits in or along water