

Perspective of a Phase II Community: Lessons Learned in our First Permit Term

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City of Scottsbluff



City of Scottsbluff

- ~16 inches annual rainfall
- Phase II Community
- NebraskaH2O member



MCM-1 Public Education



MCM-1 Public Education

➤ Last Permit Term

- School Visits
- PSA's
- Spring Show
- Educational Festivals
- Demonstration Projects
- Workshops
- Working with Media





Lessons Learned

- Target Audiences
- Target Pollutants
- Importance of Media
- Evaluation



MCM-2 Public Involvement

- Working with citizen groups
 - Keep Scottsbluff Gering Beautiful
 - Chamber of Commerce
 - Greener Nebraska Towns Initiative

			Valley Visions Taskforce					
Susan Wiedeman Panhandle Coop			They met February 8th. Downtown Revitalization is continuing with a meeting to discuss planning grant ideas. Still waiting on River Development grant. Riverside Discovery and Midwest partnered on an animal film that set attendance records. City of Scottsbluff is still working on identifying quiet zones. The schedule for Great American Clean up has been set.			Annie Folck City of Scottsbluff/		
			The next taskforce meeting is Wednesday, March 14th at 7:30 am in the Chamber Boardroom.					

MCM-3- Illicit Discharge Detection and Elimination

- Importance of an ERP
- Employee Training



MCM-4 Construction

➤ Standardization

- Plan review
- Inspections



City of Scottsbluff
Stormwater Department
630-8011

Large Site SWPPP Review Checklist (used for sites which disturb more than one acre of soil)

- ___ NOI for State Permit
- ___ Project name and description
- ___ Name of receiving waters
- ___ Sequence of major construction activities
- ___ Pollution sources
- ___ Operators
- ___ Control measures to be installed
- ___ Interim and permanent stabilization practices
- ___ Structural practices (when applicable)
- ___ Waste disposal practices
- ___ Track-out prevention practices
- ___ Operator responsibilities (who is responsible for what)
- ___ General location map
- ___ Design details for erosion control structures

Site Map must show the following

- ___ Direction of storm water flow
- ___ Areas to be disturbed
- ___ Location of concrete washout (when applicable)
- ___ Locations of BMPs
- ___ Locations of stabilization
- ___ Locations of Waters of the State
- ___ Scale
- ___ Location of rain gauge
- ___ Location of SWPPP



City of Scottsbluff Construction Site Stormwater Inspection Report

General Information			
Project Name		Location	
NPDES Tracking No.		Permittee's Contact Information	
Stormwater Permit No.		Start/End Time	
Date of Inspection			
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Type of Inspection			
<input type="checkbox"/> Initial	<input type="checkbox"/> Intermediate	<input type="checkbox"/> Final	
Weather Information			
Weather at time of this inspection?			
Do you suspect that discharges may have occurred since the last inspection?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
Are there any discharges at the time of inspection?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			

Site-specific BMPs (see map key for location of Inlets and Manholes)

BMP Description	BMP Installed and Operating Properly?	Corrective Action Needed	Date for corrective action/responsible person
1	<input type="checkbox"/> Yes <input type="checkbox"/> No		
2	<input type="checkbox"/> Yes <input type="checkbox"/> No		
3	<input type="checkbox"/> Yes <input type="checkbox"/> No		
4	<input type="checkbox"/> Yes <input type="checkbox"/> No		
5	<input type="checkbox"/> Yes <input type="checkbox"/> No		
6	<input type="checkbox"/> Yes <input type="checkbox"/> No		



MCM-4 Construction

- Enforcement Response Plan
- Education



If you have a stormwater permit (state or local) in your name, it is very important to close out that permit upon completion of a project. As long as that permit is open, you are the responsible party for any stormwater discharges coming from your site. A permit may be closed out under only two circumstances: either final stabilization must be achieved, or the permit must be transferred to another Operator or the Owner.

Under the first circumstance, coverage under a NPDES construction permit may be terminated 180 calendar days after all soil disturbing construction activity has been completed, final stabilization has been achieved, and all temporary BMPs (silt fence, inlet protection, etc.)

Construction Stormwater Permit Transfers

There is often some confusion over who is eligible to take over responsibility for a Construction General Permit. The permit must be either the owner or operator of the site. This means that the general contractor for a project is eligible to hold the permit. If for some reason, the general contractor changes during the course of the project, the permit may be transferred to the new Operator. However, subcontractors, such as landscapers, but not allowed to take responsibility for the permit, because they do not meet the definition of "operator" for the project. If a contractor's portion of a project is complete and they want to terminate their permit coverage before the landscaper completes final stabilization, then their only option is to transfer permit coverage to the owner. The new permittee will then be responsible for all inspection and best management practices required by the Construction General Permit.



The state Construction General Permit states that, with a few exceptions such as water control or frozen ground conditions, "stabilization measures must be initiated as soon as practicable in portions of the site where construction activities have temporarily or permanently ceased, but in no case more than 14 days after the construction activity at that portion of the site has temporarily or permanently ceased." Since it is unlikely that suitable vegetation can be established within 14 days, other methods of stabilization must be considered. Covering exposed or disturbed areas protects the soil from windup impact, slows the force of wind and facilitates moisture, and protects newly seeded areas. It also helps retain soil moisture, which will help your vegetation become established more quickly.



One of the simplest methods of erosion control is mulching. Straw or hay mulch should be applied at a rate of 2-3 tons per acre. To provide good ground cover, at least 50% of the mulch should be ten inches in length or longer. The mulch should be compacted using a weighted roller that anchors the mulch into the soil. If the area is seeded before the mulch is applied, this can be a very simple and effective method of preventing erosion while vegetation is established.

Another method of erosion control is a rolled erosion control blanket. These can be made from natural or synthetic materials and can be effective in protecting steeper slopes from erosion. They are designed to be rolled onto the area and tamped into place. Always follow manufacturer specifications, as poor installation can cause these products to fail. If the blanket is not properly anchored and tamped, it can either be washed away or moisture can wash out soil underneath the blanket, causing small gullies that are difficult to seed. If the area is seeded and the erosion control blanket is installed correctly, grass will grow up through the blanket, and over time, the blanket will degrade.

For extremely steep slopes or areas with limited access, hydraulic mulching should be considered. In this process, a slurry made up of mulch, seed, and a tackifying agent is sprayed onto the disturbed area. There are also many other products and stabilization methods available. Each site should be carefully evaluated to determine which product or combination of products is the most effective and economical way to achieve stabilization.



MCM-6 Good Housekeeping

➤ Facility Evaluations

- Document all BMPs currently practiced
 - Pesticide licenses
 - Spraying guidelines
 - Oil dry and spill pans
 - Vehicle Washing

➤ Employee Training

➤ Field Activities



MCM-6 Good Housekeeping

- Lessons Learned
 - Communication
 - Flexibility



MCM-5 Post-Construction



Challenges

- How do we require maintenance?
 - Homeowner's associations
 - Vacant properties
- Public support
- Enforcement



For more information

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