

# Disclaimer

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# Inspector Observations of Construction Sites

- Common Violations
  - Permit and Recordkeeping
  - Site Violations
  - Photographs of Some Site Problems
- Photographs of Good Site Practices
- Root Causes
- Potential Solutions



# Michael K. Prescott, PE

- Contractor Inspector With 30 Years Experience
- Conducted Over 220 CEIs of Federal Facilities
- Conducted 14 Construction Storm Water CEIs
- 100% of 14 Facilities Inspected Were **Not** in Compliance with Construction Storm Water Permit Requirements





# Common Permit and Recordkeeping Violations

- Did Not Apply for Storm Water Permit
- SWPPP Was Not Prepared or Not On-Site
- Inadequate SWPPP
- Required Site Inspections Not Conducted or Documented



# Common Site Violations

- BMPs Specified in SWPPP Not Implemented
- BMPs Not Maintained, Particularly After Storm Events
- BMPs Required for Changing Site Conditions Not Implemented
- Recommendations from Inspections Not Implemented





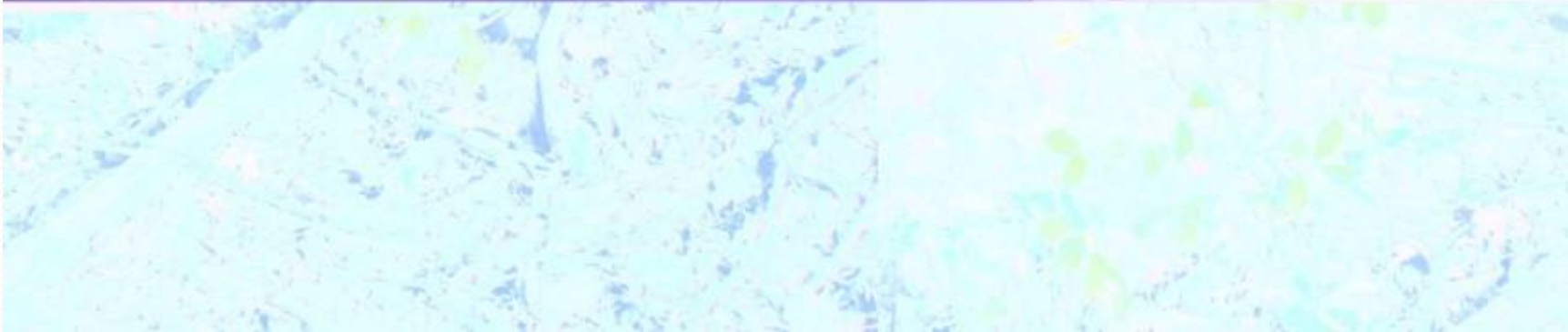
































# Examples of Good Site Practices





















# Root Causes of Violations

- Construction Contractors Often Not Interested in Storm Water Controls
- Federal Facilities Rely on Contractors to Ensure Compliance
- Lack of Adequate Oversight
- Problems Caused by Large Storm Events Not Corrected Expeditiously





# Solutions

- Federal Facility Staff Should Initially and Periodically Check Sites for Compliance
- Work With Contracts Staff to Ensure Repercussions and Immediate Fixes for Noncompliance
- Have Third-Party Contractor Conduct the Required Regular Inspections
- Audience Suggestions for Solutions
- Questions