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**Top Ten Reported Compliance Issues Reported by the EPA**

1. Not stabilizing portions of the site in a timely manner
2. Lacking adequate sediment controls on site/lack of BMP maintenance
3. Improper stockpile placement and no perimeter control
4. Lacking adequate inlet protection
5. Sediment discharges offsite and vehicle tracking
6. Inadequate solid waste management
7. Dewatering brown water

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**Top Ten Issues Reported by EPA...**

8. Deficiencies not corrected that were noted on inspection reports
9. Contractors and others on project not knowing where the Plans were or what a Storm Water Pollution Plan was
10. Lack of documentation and SWPPP modifications not made

Other. Lack of dust control and improper concrete slurry management

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**Permit calls for immediate stabilization of areas not worked for 14 days**

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**#1 Whole site open**

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**Residential sites**

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#2 Compliance issue...  
Condition of perimeter control



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#2 Perimeter control of site



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#3 Stockpile placement



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#4 Sediment and brown water discharge



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#5 Sediment discharge by track out  
When its wet/when it dries



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#6 Improper material storage/waste management



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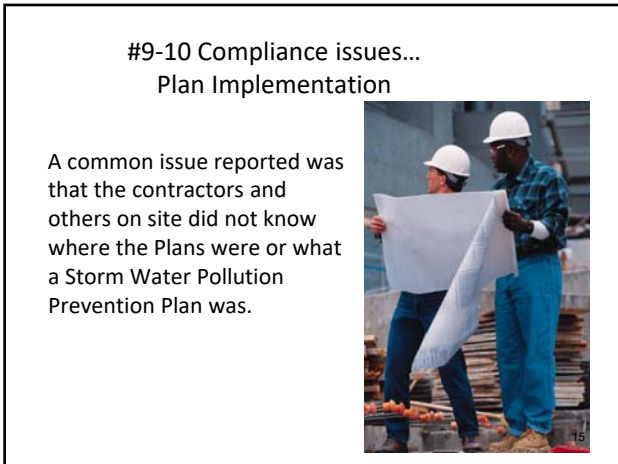


**#7 Project dewatering practices**  
This is a trout stream

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A common issue reported was that the contractors and others on site did not know where the Plans were or what a Storm Water Pollution Prevention Plan was.

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Item #	Description	Quantity	Unit	Price	Total
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (Region, Address) Preliminary Inspection Observations	
This form is provided for informational purposes only and does not reflect EPA decisions regarding violations discovered during inspection. EPA retains the ability to pursue an enforcement action for alleged violations it observes. Operators are not obligated to respond to this form.	
<b>PERMIT COVERAGE</b>	
3	Operator represented for _____ months (if months represented equals number of violations)
<b>SWPPP REVIEW</b>	
4	SWPPP not prepared (if no SWPPP, leave elements 5 - 30 blank)
5	SWPPP prepared but prepared after construction start (if at months = # of violations)
6	SWPPP does not identify all potential sources of pollution to include porta-potties, fuel tanks, staging areas, water containers, chemical storage areas, concrete cars, pumps, sedvorts, etc.
7	SWPPP does not identify all operators for the project site and the areas of the site over which each operator has control
8	SWPPP does not have site description, as follows:
A	Nature of activity in description
B	Intended sequence of major activities
C	Total disturbed acreage
D	General location map
E	Site map
F	Site map does not show drainage patterns, slopes, areas of disturbance, locations of erosion controls, structural practices shown, stabilization practices, siltate materials, waste, borrow or equipment storage areas, surface waters, discharge points, areas of final stabilization (count each omission under 10 as 1 violation)
G	Location/description industrial activities, like concrete or asphalt batch plants
9	SWPPP does not:
A	Describe all pollution control measures (e.g. BMPs)
B	Describe sequence for implementation
C	Detail operator(s) responsible for implementation
10	SWPPP does not describe interim stabilization practices

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11	SWPPP does not describe permanent stabilization practices
12	SWPPP does not describe a schedule to implement stabilization practices
13	Following dates are not recorded: major grading activities, construction temporarily or permanently closed, stabilization measures initiated (count each omission under 10 as 1 violation)
14	SWPPP does not have description of structural practices to divert flows from exposed soils, retain flows, or limit runoff from exposed areas
15	SWPPP does not have a description of measures that will be installed during the construction process to control pollutants in storm water discharges that will occur AFTER construction operations have been completed
16	SWPPP does not describe measures to prevent discharge of solid materials to waters of the US, except as authorized by 404 permits
17	SWPPP does not describe measures to minimize off-site vehicle tracking and generation of dust
18	SWPPP does not include description of construction or waste materials expected to be stored on site to explain re: controls used to reduce pollutants from these materials
19	SWPPP does not have description of pollutant sources from areas other than construction (asphalt or concrete plants) w/ updates re: controls to reduce pollutants from these materials
20	SWPPP does not identify allowable sources of non-storm water discharges listed in subpart 1.3.B of the CDP
21	SWPPP does not identify/ensure implementation of pollution prevention measures for non-storm water discharges
22	Endangered Species Act documentation is not in SWPPP
23	Historic Properties (Reserved)
24	Copy of permit and/or NOI not in SWPPP (count each omission under 24 as 1 violation)
25	SWPPP is not consistent with requirements specified in applicable sediment and erosion site plans or site permits, or storm water management plans or site permits approved by State, Tribal or local officials (e.g., MS4 requirements)
26	SWPPP has not been updated to remain consistent with changes applicable to protecting surface waters in State, Tribal or local erosion plans
27	Copies of inspection reports have not been retained as part of the SWPPP for 3 years from date permit coverage terminates
28	SWPPP has not been updated/modified to reflect change in site affecting discharge, or where inspections identify SWPPP/BMPs as ineffective, updates to SWPPP regarding modifications to BMPs not made within 7 days of each inspection (count each omission under 28 as 1 violation)
29	Copy of SWPPP not retained on site
30	A. SWPPP not made available upon request SWPPP not signed/verified

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INSPECTIONS	
31	Inspections not performed and documented either once every 7 days, or once every 14 days and within 24 hours after storm events greater than 0.5 inches or greater (not required if: temp stabilization, runoff unlikely due to winter conditions, construction during arid periods in arid areas) (Count each failure to inspect and document as one violation)
No inspections conducted and documented (if True, then leave elements 32-39 blank)	
Number of inspections expected if performed every 7 days:	
Number of inspections expected if performed bi-weekly:	
If known, number of days of rainfall of >=0.5"	
32	Inspections not conducted by qualified personnel
33	All areas disturbed by construction activity or used for storage of materials and which exposed to precipitation not inspected
34	All pollution control measures not inspected to ensure proper operation
35	Discharge locations are not observed and inspected
36	For discharge locations that are not accessible, nearby locations are not inspected
37	Entrance/exit not inspected for off-site tracking
38	Site inspection report does not include: date, name and qualifications of inspector, weather information, location of sediment/pollutant discharge, BMP(s) requiring maintenance, BMP(s) that have failed, BMP(s) that are needed, corrective action required including changes/updates to SWPPP and schedule/dates (count each omission under 38 as 1 violation)
39	Inspection reports not properly signed/verified (count each failure to sign/certify as 1 violation)
<b>AVAILABILITY OF RECORDS</b>	
40	Sign/notice not posted
A	Does not contain copy of complete NOI
B	Location of SWPPP or contact person for scheduling viewing times where on-site location for SWPPP unavailable not noted on sign

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BEST MANAGEMENT PRACTICES	
41	No velocity dissipation devices located at discharge locations or outfall channels to ensure non-erosive flow to receiving water
42	Control measures are not properly:
B	Maintenance not performed prior to next anticipated storm event
(count each failure to select, install, maintain each BMP as one violation)	
43	When sediment escapes the site, it is not removed at a frequency necessary to minimize off-site impacts
44	Litter, construction debris, and construction chemicals exposed to storm water are not prevented from becoming a pollutant source (e.g. screening outfalls, pickup daily, etc.)
45	Stabilization measures are not initiated as soon as practicable on portions of the site where construction activities have temporarily or permanently ceased within 14 days after each cessation
*Exceptions:	
(a) Snow or frozen ground conditions	
(b) Activities will be resumed within 14 days	
(c) Arid or Semi-arid areas (<20 inches per year)	
46	Common Drainage of 10+ acres does not have a sedimentation basin for the 2 year, 24 hour storm, or 3600 cubic ft. storage per acre drained
A	Where sedimentation basin not attainable, smaller sediment basins, sediment traps, or erosion controls not implemented for downslope boundaries
B	Sediment not removed from sediment basin or traps when design capacity reduced by 50% or more
47	Common Drainage: less than 10 acres does not have sediment traps, silt fences, vegetative buffer strips, or equivalent sediment controls for all down slope boundaries (not required if sedimentation basin meeting criteria in 46 above)
A	Sediment not removed from sediment trap when design capacity reduced by 50% or more

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