TDOT
Department of Transportation

EPSC Inspection Manual






July 2015

Purpose of Manual:

This manual was developed as a guidance document for conducting Erosion Prevention and Sediment Control (EPSC) inspections for Tennessee Department of Transportation (TDOT) construction projects. All TDOT EPSC inspections performed by either in-house personnel or contracted consultants shall be conducted in accordance with the procedures outlined in this manual.

All procedures, guidance or definitions noted in this manual are intended for and only binding to personnel conducting TDOT EPSC inspections.

Acknowledgement:

This manual is the result of a collaborative effort among several entities both inside and outside of the department. The following is a list of those entities that participated in developing the manual.

ARCADIS
Civil and Environmental Consultants, Inc.
ETI Corporation
Neel-Schaffer, Inc.
Palmer Engineering
TDOT Headquarters Construction
TDOT Environmental Division
TDOT Materials and Test
TDOT Region 1 Operations
TDOT Region 2 Operations
TDOT Region 3 Operations
TDOT Region 4 Operations

The department would like to thank and acknowledge all those involved in generating the manual.

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Section 1 – Introduction

1.1: What is an EPSC inspection and what should it accomplish?

TDOT EPSC inspections cover much more than just stormwater compliance!

An EPSC inspection is a thorough review of a construction project with the intent of documenting current site conditions as they pertain to compliance with all applicable environmental regulations and permits. Some EPSC inspections typically cover only stormwater compliance. However, EPSC inspections for TDOT construction projects cover compliance with all applicable environmental regulations and permits.

An EPSC inspection should accomplish the following goals.

- Review all active areas of the construction site (e.g., active outfalls, culvert/bridge construction, laydown yards, etc.).
- Determine whether or not the site conditions being observed are in or out of compliance with all applicable environmental regulations, permits, or departmental guidance documents.
- Identify any potential compliance issue with applicable environmental regulations or permits.
- Make the necessary recommendations needed to correct any compliance or potential compliance issue.
- Update project-specific documentation.
- Document all site observations or recommendations in a clear and concise manner.

1.2: Why do EPSC inspections?

EPSC inspections are a direct requirement of the TN's Construction General Permit.

EPSC inspections are a requirement of Tennessee's General National Pollutant Discharge Elimination System (NPDES) Permit for Discharge of Stormwater Associated with Construction Activities, also called the "Construction General Permit" (CGP).

In addition to performing EPSC inspections, TDOT is also required to comply with multiple federal and state environmental regulations where applicable. Departmental guidance documents, such as Standard Specifications (as amended), Special Provisions, Circular Letters, etc., are also to be complied with during construction.

1.3: Which construction projects require EPSC inspections?

The current version of the CGP requires all construction activities that will result in one (1) or more acre of land disturbance to obtain coverage under the CGP prior to discharging stormwater from that site (CGP 1.2.1). Therefore, all TDOT construction projects that must obtain coverage under the CGP will also require EPSC inspections.

Projects that disturb one (1) acre of more of land require coverage under the CGP and EPSC inspection.

1.4: How often do EPSC inspections occur?

EPSC inspections are to be performed at least twice a calendar week (i.e., Sunday through Saturday) and must be at least 72 hours apart (CGP 3.5.8.2(a)). It is important to note that an EPSC inspection frequency must meet both of the requirements mentioned above. It is not an either-or requirement.

EPSC inspections are to be twice a week and at least 72 hours apart.

Weeks that contain state and federal holidays can pose a problem when scheduling EPSC inspections. However, it is important to note that two EPSC inspections must still be performed during that week. For example, an EPSC inspector may typically conduct EPSC inspections on Tuesday and Friday of each week. The next week's Friday is a federal holiday. In order to meet the requirements set forth in the CGP, the EPSC inspector will have to either perform EPSC inspections on Monday and Thursday or conduct them on Tuesday and Saturday. Since EPSC inspections are to be at least 72 hours apart, the first weekly EPSC inspection of the following week must be at least 72 hours after the Saturday EPSC inspection (i.e., Tuesday).

The following scenarios demonstrate the correct and incorrect EPSC inspection frequency as required by the CGP.

Scenario #1 = Correct EPSC Inspection Frequency

	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Week #1		X ← two inspections per calendar week →			X		
Week #2		X ← 72 hrs. apart (minimum req.) →			X		
Week #3			X			X	
Week #4		X ← greater than 72 hrs. apart is ok →				X	

X = indicates an EPSC inspection took place on that particular day of the week

Scenario #2 = Incorrect EPSC Inspection Frequency

	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Week #1		X	not 72 hrs. apart	X			
Week #2			X				X
Week #3	not 72 hrs. apart	X				X	
Week #4			X	only one inspection in calendar week		Holiday	

X = indicates an EPSC inspection took place on that particular day of the week

EPSC inspections will begin when clearing, grading, excavating, or filling starts, and they must continue until final stabilization, as defined by the CGP, has been achieved. The frequency at which EPSC inspections are performed can be waived under certain circumstances. Section 6 of this manual can be referenced for additional details on which circumstances allow for reduction in EPSC inspection frequency and the process that must be followed.

EPSC inspections will last from the start of the project until final stabilization has been reached.

1.5: Who can perform an EPSC inspection?

In accordance with the CGP, EPSC inspections can only be performed by individuals who have successfully completed TDEC's Level I - *Fundamentals of Erosion Prevention and Sediment Control for Construction Sites* (Level 1) training course and maintain a valid certification (CGP 3.5.8.1).

1.6: Who must attend an EPSC inspection?

For an EPSC inspection to be as effective as possible, the contractor and construction inspector must accompany the EPSC inspector on all EPSC inspections. The contractor's and construction inspector's participation is imperative due to their unique roles and responsibilities associated with a TDOT construction project. The following discusses each entities responsibility as they pertain to EPSC inspections.

1.6.1: EPSC Inspector

The EPSC inspector is responsible for conducting the EPSC inspection, documenting the EPSC inspection, and distributing each EPSC inspection report. They are responsible for reviewing the project's current condition and making the necessary recommendations based on their observations. An EPSC inspector may be either a TDOT employee or a contracted consultant.

1.6.2: Contractor

For the purposes of this manual, the contractor refers to the prime contractor. The contractor is responsible for constructing the project as detailed in the contract. It is also the contractor's responsibility to implement the Storm Water Pollution Prevention Plan (SWPPP), maintain compliance with all applicable environmental regulations and permits, and implement all recommendations noted in the EPSC inspection report. According to Special Provision (SP) 107FP, the contractor assumes all responsibilities of the permittee as indicated in all environmental permits obtained by TDOT for the specific project.

SP107FP also requires the contractor to provide a primary contact for EPSC and environmental matters, who has successfully completed TDEC's Level I training course, and must accompany the EPSC inspector on all EPSC inspections. The contractor's superintendent over the project must also have successfully completed TDEC's Level I training course. If the contractor's superintendent and EPSC representative are two different individuals, then both have to have the TDEC Level I certification.

The contractor is responsible for implementing the SWPPP and maintaining compliance with all applicable environmental regulations and permits.

1.6.3: Construction Inspector

For the purposes of this manual, the construction inspector refers to the individual appointed by the TDOT construction-office supervisor to oversee the particular project and has signatory authority to sign the EPSC inspection reports. The construction inspector is responsible for day-to-day oversight of the project. Therefore, they are responsible for ensuring the contractor is constructing the project in accordance with the contract, plans, SWPPP, and any other environmental regulations or permits.

As noted above, the construction inspector signs each EPSC inspection report. When signing an EPSC inspection report, they are doing so as a representative of the permittee. Since TDOT is the site owner, the construction inspector is signing as the primary permittee (owner/developer) with design control who has "operational control over construction plans and specifications (CGP 2.3.1)". As the primary permittee (owner/developer), the CGP states in section 2.3.1 that a primary permittee must, "Ensure that all operators on the site have permit coverage, if required, and are complying

The construction inspector is responsible for ensuring the contractor is implementing the SWPPP, EPSC recommendations, and permit conditions.

with the SWPPP." Therefore, the construction inspector is responsible for ensuring that the contractor is implementing the recommendations noted in each EPSC inspection report and complying with the SWPPP.

It is recommended that the EPSC inspector and the construction inspector be separate individuals to maintain "checks and balances." However, it is understood that workforce numbers may not allow for this separation. That decision will be up to the TDOT construction-office supervisor.

The three entities described above represent three types of input that are needed at every EPSC inspections to make it as efficient and effective as possible. Those inputs are the objective/subject-matter expert (EPSC inspector), entity with the capability to perform the work (contractor), and owner of the site (construction inspector). Every EPSC inspection has the potential to impact the workload of the contractor and the budget associated with the project. Having all three entities present at the EPSC inspections will afford every effected party a chance to discuss the issue at hand.

Section 2 – Preparing for a Project

Even though EPSC inspections do not start until construction commences, there are certain activities an EPSC inspector must do in order to be prepared for EPSC inspections. This section addresses those activities that need to occur prior to construction.

2.1: Document Review

As soon as it is known that a project will require EPSC inspections, preparation needs to begin by reviewing project-related documents such as the roadway plans, SWPPP, and water quality permits. Reviewing these documents early on gives an EPSC inspector a chance to become familiar with the project and identify any issues or discrepancies prior to construction. The earlier issues are identified and addressed the less likely they will cause a delay in construction.

2.1.1: Roadway Plans

Roadway plans contain a vast amount of information that an EPSC inspector needs to become familiar with prior to construction. The following information needs to be reviewed.

- General/Special Notes: Near the front of roadway plans is a section dedicated to notes that detail conditions the contractor must meet. These notes are broken up into General and Special Notes. Both of these sections need to be reviewed for any condition that pertains to environmental matters.
- EPSC Notes: Prior to the EPSC plans there will be a section dedicated to EPSC notes that also detail conditions the contractor must meet or follow throughout construction. This section typically contains general conditions found in the CGP, but it can contain special conditions that may be specific to the project.
- Project Commitment Sheet: Also near the front of the roadway plans may be a list of project commitments that were made throughout the planning and design of the project. This should be checked for any environmental commitments that were made for the project
- Stream/Wetland Impacts: The roadway plans should depict all streams or wetlands and their associated impacts. The details, such as culvert length, riprap length, end wall treatments, etc., surrounding the impacts can be found on the present layout, proposed layout, and profile view. Other areas of the plans such as culvert and roadway cross-sections may also provide useful information.
- Estimated Roadway Quantities: Also near the front of the roadway plans is a section that lists all items setup for use on the project and their associated

quantities. An EPSC inspector needs to be familiar with the items or EPSC measures they will have available during the life of the project. The project contract can also be consulted for a complete list of items and quantities.

2.1.2: SWPPP

TDOT SWPPPs are comprised of two documents. Those documents are the EPSC narrative and EPSC plans.

Outfall – is any point where stormwater runoff is discharged in a concentrated manner (i.e., ditch, pipe, swale, etc.) off ROW or into a stream or wetland.

- EPSC narrative: This document provides language which spells out the steps TDOT will take to maintain compliance with the CGP throughout the life of the project. Also included is project specific information that needs to be reviewed. The following information can be found and needs to be reviewed prior to construction.
  - design storm event
  - amount of disturbed acreage
  - seasonal limitations
  - soil characteristics
  - stream and wetland information
  - outfall information
  - maintenance schedule of EPSC measures
  - special notes or conditions
  - utilities in contract
  - stream buffer requirements

- EPSC Plans: EPSC plans are engineering drawings that depict the staging and location of all EPSC measures. Included in the EPSC plans are the location of all streams, wetlands, wet weather conveyances, drainage structures, and outfalls. The following information needs to be reviewed prior to construction.
  - the staging of the EPSC measures
  - the location of EPSC measures and associated standard drawings
  - outfall locations and associated drainage size

2.1.3: Water Quality Permits

Water quality permits refer to the permits issued for the physical alteration of streams and wetlands. The three main water quality permits that typically impact a TDOT project are TDEC's Aquatic Resource Alteration Permit (ARAP), US Army Corps of Engineers' (USACE) Section 404 (404) permit, and Tennessee Valley Authority's (TVA) 26A permit. These permits will contain conditions or restrictions that an EPSC inspector needs to be familiar with prior to construction.

Physical alterations to streams or wetlands may require a water quality permit from three (3) separate resource agencies (TDEC, USACE, and TVA)

In order to determine all restrictions and conditions that have to be met during construction, TDOT's application for all water quality permits (i.e., ARAP, 404, and 26a) must also be reviewed. When an application is submitted to the resources agencies, it may include self-imposed restrictions (e.g., fish sweeps prior to construction, seasonal limitation on in-stream work, no haul road in stream, etc.). Often times, those self-imposed restrictions do not make it into the permits or plans. It is important to note that any self-imposed restriction proposed to the resource agencies in an application is just as binding as if there were noted in the permits or plans.

While reviewing the water quality permits, it is important to compare the description of what is authorized in the permits to what has been included in the roadway plans. Often, changes are made to the project design after permits have been received and the permits are not modified to reflect the new design. These conflicts between the permits and plans need to be corrected early on in the process as to avoid delay in construction.

Attention needs to be given to the expiration date of each permit. Depending on the time of permit issuance and the time given to complete a project, permits may expire mid-construction. In the event a permit expires prior to the authorized work being completed, a request for a permit extension needs to be made to TDOT's Permits Section within 6 months of permit expiring.

Permit Matrix:

Since several documents have to be reviewed in order to determine what is required of TDOT during construction, it is recommended that a permit matrix be developed. A permit matrix is simply a table that lists every authorized impact and its corresponding requirements. A permit matrix allows an EPSC inspector to have all authorized impacts and requirements in one document for an easy reference tool throughout construction.

The table below is an example of a recommended permit matrix.

Permit Matrix for CNZ123			
Station #	**Resource**	**Authorized Impact**	**Conditions/Restrictions**
35+00 (Lt.)	Flat Branch (STR-14)	Construct 210'. of 2 – 10'x9' RCBC with 60' of riprap at inlet and 50' of riprap at outlet	-notify TDOT Ecology Section at least 2 weeks prior to construction so fish sweeps can be performed -in-stream work can only take place between July 1st and October 1st.
67+25 (Rt.)	Unnamed tributary to Spencer Creek (STR-9)	Relocate approx. 550' of existing stream channel into 665' of constructed channel, with two rows of trees planted on both sides	-construction of relocated channel must be overseen by a qualified professional -all work on relocation channel must be done in the dry
78+45 (Rt.)	Wetland (WTL-2)	Permanently fill 1.5 ac. of wetland and temporarily impact .5 ac.	-temp. impact must be restored to pre-construction conditions

2.1.4: How to handle discrepancies.

If a situation is encountered where impacts identified in the roadway plans are not addressed in the project's environmental permits, or there are project constructability issues that will prevent the impacts from being accomplished under the current permit requirements, then the following steps need to be taken.

1. Determine if the discrepancy between the plans and permits warrants a water quality permit modification. In general, any deviation from what is described in the permits will require a permit modification. If assistance is needed in making this determination, please contact the Environmental Coordinator, Stormwater Coordinator, or permit writer from TDOT's Environmental Division.

2. If it is determined that a permit modification is warranted, follow the steps outlined in Circular Letter (CL) 107.08-02 *Water Quality Permit Request During Construction (New or Modification).*

2.2: Preconstruction Meeting

Preconstruction meetings allow for all pertinent environmental information to be relayed to the contractor prior to construction.

Prior to construction starting, a preconstruction meeting must be held. If a project disturbs more than one acre or has environmental permits, an environmental preconstruction meeting may also be held at the discretion of the TDOT construction-office supervisor. The preconstruction meeting and the environmental preconstruction meeting may take place at the same time or at two separate times.

A preconstruction meeting allows for all pertinent information, which pertains to environmental matters, to be relayed to the contractor prior to construction. It is imperative that all information be relayed in a clear and concise manner as to avoid any confusion or misunderstanding.

2.2.1: What needs to be discussed?

During the preconstruction meeting or environmental preconstruction meeting the following objectives need to be achieved. Typically the TDOT construction-office supervisor conducts the preconstruction meeting and discusses the objectives below with all present. However, an EPSC inspector needs to consult with the TDOT construction-office supervisor to confirm who will discuss what objectives.

- Remind the contractor of their responsibilities under Special Provision 107FP (if applicable under the contract).
  - The contractor assumes all responsibilities of the permittee as noted in the permits for the protection of waters of the United States and waters of the State of Tennessee.
  - It is the contractor's responsibility to implement the provisions of the water quality and stormwater permits that pertain to construction activities.
  - The contractor will not be released from the project site responsibilities under the NPDES permit provisions until the Notice of Terminations (NOT) is submitted to TDEC by TDOT.
  - The contractor (or a representative) is responsible for accompanying the EPSC inspector on all EPSC inspections as well as attending all QA audits. The contractor or their representative attending all EPSC inspections shall hold a current TDEC Level 1 certification.
  - The contractor's project supervisor shall also hold a current TDEC Level 1 certification.
  - The contractor or their representative shall sign all EPSC inspection reports and any supporting documentation.
  - The contractor shall make necessary maintenance or repairs relative to deficiencies in permit conditions or requirements within twenty-four (24) hours after an EPSC inspection identifies the maintenance or repair need, and/or when directed to do so by the local TDOT construction office supervisor unless conditions make a particular activity impracticable. Even though deficiencies may not be corrected within 24 hours due to site

conditions, no noted deficiency can go uncorrected for more than 7 days (3.5.8.2(e)).

- In the event a Notice of Violation (NOV) or Order is issued on the project, any and all fines will be the sole responsibility of the Contractor.
- Failure of the Contractor to comply with SP107FP or take immediate corrective actions required within twenty-four (24) hours (unless documented conditions make a particular maintenance or repair activity impracticable immediately) shall be reason for the local TDOT construction-office supervisor to suspend all other work on the Project, except erosion prevention and sediment control (EPSC) and traffic control, applying non-refundable deductions of monies from the Contract per calendar day from monies due to the Contractor for any EPSC work on the Project.

- Identify the contractor's personnel who will be accompanying the EPSC inspector on all EPSC inspections, and establish a method of communication for relaying EPSC inspection times, site problems and recommendations. Ensure that the contractor's EPSC representative holds a current TDEC Level 1 certification.
- Make the contractor aware if any threatened or endangered (T/E) species are present in or near the project. Also, discuss all special notes, restrictions or permit conditions that pertain to the protection of the T/E species.
- Discuss all special and general conditions found in the issued water quality permits.
- Discuss any discrepancy or issue discovered during the review of project-related documents. Inform the contractor if any permit modifications are being applied for as a result of the review.
- Set time and date for the preconstruction walk through with the contractor.
- Discuss that all environmentally sensitive areas and areas to be left undisturbed must be marked with high visibility fencing in the field prior to beginning construction.
- Discuss that disturbed areas that are inactive must be stabilized (temporarily or permanently) within 14 days. Steep slopes (35% or greater) must be stabilized within 7 days of inactivity.
- Discuss that EPSC measures must be cleaned out when ½ the storage volume has been filled with sediment.

- Discuss that if EPSC measures on the plans are being replaced with other equivalent manufactured products, the product must be on and installed according to the Qualified Products List (QPL).

- Discuss that any discharge from dewatering activities must be treated by appropriate EPSC measures (i.e., sediment filter bag or other approved devices) prior to being discharged.

- If utility work will occur on ROW, whether in contract or not, refer the contactor and utility contractor(s) to CL209.01-5 *Utilities and Environmental Permits*.

- Discuss that the following actions should occur prior to active construction.
  - Initial measures have been installed before clearing, grubbing or grading work begins or concurrently with.
  - Project bulletin board has been installed, as discussed in CL1273-01 with all applicable information posted as specified in the CGP.
  - Rain gauges have been installed (at least one per mile or any portion of a mile).

- Discuss that any demolition of houses or bridges will require submittal, by the contractor, of TDEC's form CN-1055, *Notification of Demolition and/or Asbestos Renovation.* SP202ACM can be referenced for details on appropriate protocols.

2.3: Preconstruction Walk Through

The preconstruction walk through allows for the documentation of preconstruction site conditions and any unplanned issues, such as constructability or overlooked environmental or drainage features.

A preconstruction walk through will allow for preconstruction conditions to be documented for later use.

Having documentation of preconstruction site conditions can be helpful later if problems arise during construction. Attendees should include, at a minimum, the EPSC inspector, TDOT construction inspector and the contractor. Additional attendees may include the contractor's EPSC subcontractor, Ecology Section representative(s), utility subcontractor representative(s), Regional Stormwater Coordinator (or the consultant QA Auditor) or the Regional Environmental Coordinator.

2.3.1: What should you be looking for?

Please keep in mind that a preconstruction walk through is not intended to be equivalent to a full environmental survey or engineering review. Rather, it is an opportunity to look

for obvious areas that may require further review by TDOT's Ecology Section or Operations.

The following objectives should be met during a preconstruction walk through:

- Review and document the preconstruction condition of all outfalls.
- Identify overlooked features such as streams, wetlands, sinkholes or wet weather conveyances.
- Identify any discrepancies between the ecology report, project plans and water quality permits.
- Identify any areas of special environmental concern (what does the contractor need to be aware of during the project).
- Identify locations of all structures and site constructability issues.
- Identify any feasibility issues with construction techniques.

2.3.2: Documenting the walk through

Taking pictures is an easy way to document preconstruction site conditions. All the identified outfall points should be photographed to document the pre-existing site conditions. Also, all points where the proposed alignment crosses water features (springs, streams, rivers, wetlands, etc.) should be photographed to show the conditions upstream and downstream.

Any areas of environmental concerns should also be documented so details can be shown after construction has begun. Feel free to take pictures of any situation that may become an issue later on during construction. Pictures taken during the preconstruction walk through should be documented on the TDOT *Preconstruction Site Conditions* form. An example of a completed *Preconstruction Site Conditions* form is included below.

TN TDOT Department of Transportation

Preconstruction Photo Log
SR-15, LawrenceCounty
CNN123; PIN 123456.02
Date: 04-25-2013

Preconstruction Site Conditions

	**Photo #:** 1 **Station #:** 35+55 **Outfall#:** N/A **Stream/Wetland #:** STR-19 **Comments:** Intersection of proposed alignment and STR-19. Looking upstream.
	**Photo #:** 2 **Station #:** 35+55 **Outfall#:** N/A **Stream/Wetland #:** STR-19 **Comments:** Intersection of proposed alignment and STR-19. Looking downstream.
	**Photo #:3** **Station #:**65+30 **Outfall#:** N/A **Stream/Wetland #:** STR-14 **Comments:** Recent logging activities not associated with the project has impacted STR-14.

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Form Revised 07-2015

Example of a completed *Preconstruction Site Conditions* form

2.3.3: What to do if something is discovered in the field?

If problems are observed during the initial walk-through, let the TDOT construction-office supervisor know as soon as possible. If streams or wetlands were overlooked, the Permits and Ecology Section need to be notified immediately so a determination can be made.

If issues are identified in the field, include the Environmental Coordinator and Stormwater Coordinator in any communication.

Section 3 – Conducting the EPSC Inspection

3.1: Pre-inspection Preparation

3.1.1: Document Review

Preparation for an EPSC inspection comes through reviewing the documents noted below. Even though an EPSC inspector spent time prior to construction reviewing many of the documents listed below, it is important to refresh their memory of the project. The time and effort spent reviewing each type of document will vary depending on the size and complexity of the project to be inspected.

- Plans (roadway and EPSC plans) – review station numbers, location of stream/wetland impacts, location and phasing of EPSC measures, and special notes.
- Rainfall log – review past rainfall data which will indicate what field conditions to expect as well as the level of attention needed at the upcoming EPSC inspection.
- Previous EPSC report – review past recommendations and problem areas which will aid in directing attention to areas that might need extra review. Also pay attention to dates of ground disturbance and stabilization.
- All permits – review all permitted stream/wetland work as well as any restrictions or special sequencing. The permit matrix developed preconstruction should be used as reference tool.

3.1.2: Equipment needed for each EPSC inspection

Prior to leaving the office the day of the EPSC inspection, the EPSC inspector must assure they have the following items.

- Proper personal protection equipment (consult departmental policy for required PPE))
  - Hard hat
  - Class III safety vest
  - Safety glasses
  - Appropriate footwear
- Digital camera
- Roadway plans
- SWPPP
- Permit Matrix

- Field book (weather proof)
- Blank copies of the EPSC inspection report
- Previous EPSC inspection reports

3.2: Arrival at site

Upon arriving at the construction project the EPSC inspector will check in with the construction inspector and the contractor. While meeting with the construction inspector and contractor, the EPSC inspector needs to meet the following objectives.

- Identify any safety concerns such as scheduled blasting, areas of heavy construction traffic, or site access issues.
- Identify any new areas of disturbance since last EPSC inspection. This will make an EPSC inspector aware of new areas to inspect.
- Obtain daily rainfall data. Depending on the amount of rain recorded, the EPSC inspector can anticipate a longer than usual EPSC inspection and may want to concentrate on past problem areas.
- Obtain the estimated disturbed acreage if available from the construction inspector or contractor. If not, it will have to be determined while inspecting the site.
- Discuss the contractor's construction schedule for the next couple of days, so a portion of the EPSC inspection can be spent reviewing these areas for any potential concerns.
- Identify any problem areas that need extra attention during the EPSC inspection.

3.3: How do you approach an EPSC inspection?

Due to the linear nature of roadway projects and the fact that they can often times impact several drainage areas and disturb large amounts of acreage, it is recommended that an EPSC inspection begin at one of the project's termini (preferably the beginning termini). Starting an EPSC inspection at one of the project's termini will allow for field notes, pictures and station numbers to be maintained in sequential order.

As the EPSC inspector advances through the project, they will inspect each active outfall and associated drainage area as they come to them. When the EPSC inspector comes upon a permitted water quality impact site, they will then inspect that site and then continue on inspecting the remaining outfalls and drainage areas.

3.4: What to look for during an EPSC inspection?

The following areas of a construction project need to be inspected during every EPSC inspection. If any of these areas are found to be out of compliance or perceived to be in jeopardy of being out of compliance, the EPSC inspector shall make the necessary recommendations to either regain or maintain compliance.

3.4.1: Bulletin Board

The CGP requires the following information to be posted and maintained throughout the life of the project and accessible to the public (CGP 6.2.1).

- A copy of the NOC with the NPDES permit tracking number and the contractor's name.
- The name, company name, email address (if available), telephone number, and address of the project site owner/operator or local contact person.
- A brief description of the project.
- The location of the SWPPP. If the SWPPP is located off site, the location of the SWPPP as well as a contact phone number must also be posted on site.

3.4.2: Items maintained on site

The CGP requires that the following items be kept on site throughout the life of the project (CGP 6.2.1).

- Rain gauges.
- Copies of the EPSC inspection reports. If the EPSC inspection reports cannot be kept on site, then the location and contact phone number must be posted on the bulletin board.
- A copy of the EPSC inspector's TDEC Level I certification.

3.4.3: Disturbed Acreage

At no time shall the project have more than 50 acres of disturbed ground open (CGP 3.5.3.1(k)). The EPSC inspector must estimate the amount of disturbed acreage during each EPSC inspection. Please keep in mind that areas that have been temporarily stabilized are not to be included in the total disturbed acreage.

3.4.4: Outfall Points

All active outfalls must be inspected in order to determine whether or not EPSC measures are effectively controlling erosion and preventing sediment from leaving the construction site (CGP 3.5.8.2(d)). Evidence that EPSC measures are potentially not adequately working are the presence of sediment releases and objectionable color contrast.

Active Outfall = is an outfall that has had any portion of or its drainage area disturbed by clearing, grubbing, excavation, filling, or grading.

This means that an EPSC inspector will have to walk to the actual point where the stormwater leaves the project or enters a stream or wetland.

3.4.5: Sediment Releases

An EPSC inspector needs to be looking for any evidence that sediment has made it past ROW or into a stream or wetland. Sediment releases can indicate that a project's EPSC measures are inadequate and need to be upgraded.

Sediment releases can be divided into two main categories. They are:

- releases that occur off ROW but not into a stream or wetland, or
- releases that impact stream or wetlands.

CL 209.01-03 should be followed in the event a sediment release is discovered during the EPSC inspection. It's important to note that sediment releases into streams or wetlands cannot be removed without approval from TDEC.

3.4.6: Objectionable Color Contrast

Prohibited by the CGP is any discharge of stormwater that results in any "objectionable color contrast in the receiving stream" (CGP 5.3.2(c)). Furthermore, the TDEC inspection form requires an EPSC inspector to verify whether or not EPSC measures are functioning correctly "such that there is no objectionable color contrast in the receiving stream…" In order to comply with this requirement, an EPSC inspector must inspect every active outfall to verify that no objectionable color contrast is occurring in the receiving stream.

Objectionable color contrast is when the discharge water from a construction site is noticeable different from the color (clarity) of the receiving stream.

Objectionable color contrast can also occur at other places besides the outfall points. An EPSC inspector needs to make sure none of the streams or wetlands on the project has an objectionable color contrast during each EPSC inspection.

3.4.7: EPSC Measures

EPSC measures are to be inspected to ensure they are:

- Installed correctly according to the standard drawings or the QPL if a propriety product is being used in place of a Standard Drawing.
- Located in the proper location within the drainage area. For example, a measure designed to handle sheet flow put in an area that gets concentrated flow.
- Sized correctly to handle the potential runoff and sediment load. Due to site conditions, measures may not be able to be constructed with adequate storage. In these cases, redundant (i.e., a series of) measures should be used to add additional storage capacity.
- Maintained correctly. All measures that have had their capacity reduced by half must be cleaned out to remain effective (CGP 3.5.3.1(e)).
- Effectively preventing or minimizing erosion and controlling the mobilized sediment from leaving the site (CGP 3.5.3.1(a)).

3.4.8: Stabilization

Any disturbed area that is inactive (i.e., no active work occurring) and the activity will not resume for a period longer than 14 calendar days must be either temporarily or permanently stabilized (CGP 3.5.3.2). Disturbed areas that have a gradient of 35% or greater must be stabilized within 7 days of activity ceasing (CGP 3.5.3.2).

Please keep in mind that preconstruction vegetative ground cover cannot be disturbed more than 15 days before grading unless the area is temporarily or permanently stabilized (CGP 3.5.3.1(h)).

3.4.9: Water Quality Sites (ARAP, 404, 26A)

All stream and wetland alteration sites (i.e., water quality sites) need to be inspected in order to ensure they are being conducted in accordance with the issued water quality permits.

3.4.10: Buffer Areas

The CGP requires that "[a] 30-foot natural riparian buffer zone adjacent to all streams at the construction site … be preserved, to the maximum extent practicable, during construction..." (CGP 4.1.2). The stream buffer width needs to average 30-feet with a minimum width of 15-feet. Streams that are classified as Exceptional Tennessee Waters (ETW) or impaired must have a stream buffer preserved with an average width of 60-feet with a minimum width of 30-feet (CGP 5.4.2).

Certain projects are exempt from the buffer requirement (CGP 4.1.2, 4.1.2.1, 4.1.2.2, 5.4.2, 5.4.2.1, 5.4.3). All TDOT SWPPPs will indicate whether or not the buffer requirements apply to a particular project. Please refer to the project specific SWPPP to determine if buffers are required.

3.4.11: Past Recommendations

All recommendations and recurring recommendations made during the previous EPSC inspection need to be reviewed in order to verify their completion. If they have not been completed, then they will need to be included in the current EPSC inspection as a recurring recommendation.

3.4.12: Waste and Borrow Areas

Please refer to the current edition of the department's manual titled *Procedures for Providing Offiste Waste and Borrow on TDOT Projects* for detailed instructions on which waste and borrow sites are to be inspected.

3.4.13: Trash and Litter

Project sites should be free of excessive trash and/or debris that could become mobile and leave the site (CGP 3.5.3.1(f)). Having trash/debris either wash off or be blown off a site is a quick way to get an adjoining landowner's attention that a construction site may not be in compliance. Furthermore, the CGP requires that litter or debris be picked up so they do not become a source of pollutants.

3.4.14: Spills/Equipment Leaks

Any spilled or leaked material such as gasoline, diesel, hydraulic oil or engine oil needs to be cleaned immediately and disposed of properly in such a manner as to prevent any spilled material from being discharged from the site (CGP 5.2, 4.1.6)). An EPSC inspector needs looking for signs of a leak or spill as they conduct their EPSC inspection. The project-specific SWPPP should be consulted for guidance on proper handling of spills and leaks.

3.4.15: Fuel Storage

For any fuel tanks located within ROW, make sure that there is proper containment around the tank to capture any rupture or leak. This can be done through the use of such structures as berms or double hulled tanks. Be aware of collected rainfall in any containment berm around a fuel tank and ensure that this water is periodically pumped out and properly disposed of. This water can reduce the capacity of any containment berm and possibly become polluted with any residual product from the tank.

Be aware of the location of any fuel tank or chemicals on the project. These substances must be prevented from mixing with any site stormwater discharge. Any chemical materials stored on the site must be kept dry and stored out of the elements. Make sure that fuel tanks and chemicals are not maintained in a location that could discharge to a stream, wetland, or other environmentally sensitive area. If there is a spill or release on the project, it must be prevented from entering any stream or wetland.

3.4.16: Burning

Open burning is prohibited unless it is specifically exempted by law. TDEC's Regulations (Chapter 1200-3-4) lists the types of materials that can be open burned. The only materials that can be burned on site are natural vegetation, trees, and untreated lumber. There is a special exemption for blasting material, and the regulations need to be reviewed to determine when that exemption applies. All applicable state and local regulations for burning apply to TDOT projects. Therefore, any applicable permits must be obtained prior to any burning activity by the contractor.

3.4.17: Concrete Washout

The CGP prohibits the discharge of wastewater from concrete washout "unless managed by appropriate controls" (CGP 4.1.6). Typically, wastewater from concrete washout is managed through containing the concrete wastewater onsite. This is usually achieved by digging a hole near the concrete work and requiring all concrete trucks to washout in the created depression. An alternative to digging a hole is to create containment areas using hay bales or barrier rails wrapped in plastic.

Washout areas need to be clearly identified (i.e., labeled) on the site.

3.4.18: Construction entrances and exits

The CGP requires that all construction site entrances and exits be stabilized as needed in order to minimize off-site tracking (CGP 3.5.3.1(n)). Construction entrances/exits need to be monitored for effectiveness and may need to be refreshed periodically.

3.4.19: Dust

The generation of dust from a construction project must be minimized (CGP 3.5.3.1(n)). An EPSC inspector needs to be aware of dust generation especially during the dry months of the year.

3.4.20: SWPPP Modifications

The project-specific SWPPP must be modified according to the CGP (section 3.4) under the following circumstances:

- When the scope of the project has changed in such a manner that is expected to have a significant effect on the discharge of pollutants and has not been accounted for in the original SWPPP;
- When there is a change in or the addition of chemical treatment methods, such as different chemical used, dosage or application rate, or location of use;
- When an EPSC inspection by the site owner, local, state, or federal officials indicates the project-specific SWPPP is ineffective in eliminating or significantly minimizing sources of pollutants, or is otherwise not achieving the general objectives of controlling pollutants in stormwater discharges;
- When a new operator, as defined by the CGP in section 2, has assumed control over a portion of or the entire construction project;
- When measures are necessary to prevent negative impacts to legally protected state or federally listed fauna or flora;
- When a Total Maximum Daily Load (TMDL) is developed for the receiving stream(s) for pollutants of concern that have not otherwise been addressed in the original project-specific SWPPP.

During an EPSC inspection, the EPSC inspector needs to be aware of any site changes that would constitute a SWPPP modification.

3.5: Making Recommendations!

3.5.1: What is a recommendation and what should it accomplish?

A recommendation is the EPSC inspector's best plan of action to remedy an identified issue. The issue can be either a noted failure or potential failure.

Every recommendation made should accomplish the goal of either maintaining compliance or regaining compliance.

The goal of every recommendation should be to either regain or maintain compliance.

3.5.2: Who makes the recommendations?

As discussed above, an EPSC inspection is a collaborative effort between the EPSC inspector, construction inspector, and contractor. Likewise, the process of making recommendations should also be a collaborative effort. Once again, all three entities need to be present at the EPSC inspection so all concerns surrounding a recommendations can be expressed.

Even though making a recommendation should be a collaborative effort, it is still ultimately the EPSC inspector's responsibility to make the appropriate recommendation they deem necessary to keep the project in compliance or regain compliance.

3.5.3: Types of Recommendations

All recommendations can be broken down into three categories: corrective actions, recurring corrective actions, or future maintenances. The following describes each category and their intended use.

- **Corrective actions** are recommendations that address an issue that poses an immediate threat to the project being out of compliance or regaining compliance. Corrective action items are those issues or deficiencies that need to be addressed by the contractor within 24 hours. An example of an issue that would dictate a corrective action recommendation would be a section of damaged silt fence with wire backing along a stream bank.

- **Recurring corrective actions** are corrective action items made during the previous EPSC inspection that have not been completed within the required timeframe (24 hours). Recurring corrective action items should be used for instances when the contractor neglected their responsibilities.

- **Future maintenance** items are recommendations that address an issue that **does not** pose an immediate threat to the project being out of compliance, but will need to be completed in the future to maintain compliance. Future

maintenance recommendations may be used as an advance notice and preventative maintenance tool. These recommendations do not have to be completed within 24 hours. An example of an issue that would dictate a future maintenance recommendation would be the application of temporary mulch to an area that is getting close to being inactive for 14 days.

Often times an EPSC inspector may encounter a situation that does not require a recommendation, but warrants documenting. These types of observations can also be documented on the EPSC report. An EPSC inspector is encouraged to document any situation they deem necessary.

3.5.4: What to consider when making recommendations

The following considerations need to be given to all recommendations being made during an EPSC inspection.

- Is the issue at hand out of compliance with a permit or regulations? Some examples would be a sediment release, objectionable color contrast, no concrete washout area available, or inactive disturbed areas past 14 days. If so, the recommendation needs to be a corrective action and include the required actions needed to regain compliance.

- Does the issue at hand pose a potential threat to being out of compliance with permits or regulations? For example, a silt fence with wire backing that is undermined adjacent to a stream and has not yet released any sediment. In this case, the recommendations needs to be a corrective action and contain the steps required to maintain compliance and prevent a compliance issue.

- Can the issue at hand be addressed by a future maintenance recommendation? Issues that do not need immediate attention need to be written up as future maintenance item.

- What caused the issue? An EPSC inspector must understand what caused the issue in order to recommend the best remedy. For example, a section of silt fence has been knocked over due to receiving concentrated flow. If an EPSC inspector does not understand the reason behind the failure (i.e., silt fence not designed for concentrated flow), they are likely to not address the reason for failure in the recommendations and have a repeat failure during the next rain event.

- Does the issue at hand require an erosion prevention or sediment control measure?

- What size drainage area are you dealing with? Can a single measure handle the volume of stormwater runoff, or do redundant (i.e., a series of) measures need to

be used? Redundant measures can be a very useful tool when dealing with limited space for a large measure.

- What is the potential sediment load to be treated compared to the volume of storage created by the measures? An EPSC inspector needs to consider the amount of disturbed area and potential for sediment to become dislodged in runoff
- Did the storm event exceed the design storm criteria? If the storm event exceeded the design storm in depth or intensity, a recommendation to reinstall the measure would be appropriate. If the measure failed and the storm event was less than the design storm criteria, the original measures were likely inadequate. Please refer to Appendix A for guidance on determining if a recorded rain event exceeded the design event.

Section 4 – Documenting the EPSC Inspection

After inspecting the project, an EPSC inspector must document their observations, recommendations, rainfall data, pictures, and SWPPP modifications.

All EPSC inspection documentation must be completed and posted to the department's stormwater drive within 48 hours of completing the inspection. Section 5 of this manual can be referenced for guidance on posting the EPSC inspection report.

All documentation must be completed in a clear and concise manner as to avoid any confusion or misunderstanding.

4.1: TDEC's Construction Stormwater Inspection Certification

Every EPSC inspection must be documented on TDEC's form titled *Construction Stormwater Inspection Certification* (CGP 3.5.8.2(g)). This form needs to be completed in its entirety and signed by the EPSC inspector and the primary permittee.

All questions on this form need to be carefully read and answered. The following gives detailed instruction on completing certain portions of the form. A blank copy TDEC's form can be found in Appendix C.

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION (TDEC)
Division of Water Resources
William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243
1-888-891-8332 (TDEC)
General NPDES Permit for Stormwater Discharges from Construction Activities (CGP)

Construction Stormwater Inspection Certification (Twice-Weekly Inspections)

Site or Project Name: SR-15 Wayne County			**NPDES Tracking Number: TNR** 123456
Primary Permittee Name: TDOT - CNN123			Date of Inspection: 11-13-14
Current approximate disturbed acreage:	24	Has rainfall been checked/documented daily? ☑ Yes ☐ No	Name of Inspector: John Doe
Current weather conditions: wet due to recent rains; sunny with temps in the 80s			Inspector's TNEPSC Certification Number: 118788

Site or Project Name: Insert the road name or number followed by the county. A limited amount of additional detail can be added in order to distinguish between two projects on the same road, if necessary.

NPDES Tracking Number: Insert the TNR# listed on the NOC for the project.

Primary Permittee: Insert the primary permittee's name (i.e., TDOT) followed by the contract number (e.g., CNN123).

Inspector's TNEPSC Certification Number: Insert the number listed on the EPSC inspector's Level 1 certification card. The

following website can be a reference for obtaining certification numbers: http://tnepsc.org/Level1Listing.asp.

Please check the box if the following items are on-site:

☑ Notice of Coverage (NOC) ☑ Stormwater Pollution Prevention Plan (SWPPP) ☑ Twice-weekly inspection documentation

☑ Site contact information ☑ Rain Gage ☑ Off-site Reference Rain Gage Location: TVA Tims Ford Dam

This area requires the EPSC inspector to indicate, by checking the appropriate box, whether or not the items listed are located on site. Simply check the boxes next to the items that are located and being maintained on site.

Please note that if the SWPPP and EPSC inspections are being kept and maintained off site, it is appropriate to leave those check boxes unchecked.

Best Management Practices (BMPs):

Are the Erosion Prevention and Sediment Controls (EPSCs) functioning correctly: If "No," describe below in Comment Section			
1.	Are all applicable EPSCs installed and maintained per the SWPPP?	■ Yes	☐ No
2.	Are EPSCs functioning correctly at all disturbed areas/material storage areas per section 4.1.5?	■ Yes	☐ No
3.	Are EPSCs functioning correctly at outfall/discharge points such that there is no objectionable color contrast in the receiving stream, and no other water quality impacts per section 5.3.2?	■ Yes	☐ No
4.	Are EPSCs functioning correctly at ingress/egress points such that there is no evidence of track out?	☐ Yes	■ No
5.	If applicable, have discharges from dewatering activities been managed by appropriate controls per section 4.1.4? If "No," describe below the measures to be implemented to address deficiencies.	■ Yes	☐ No
6.	If construction activity at any location on-site has temporarily/permanently ceased, was the area stabilized within 14 days per section 3.5.3.2? If "No," describe below each location and measures taken to stabilize the area(s).	■ Yes	☐ No
7.	Have pollution prevention measures been installed, implemented, and maintained to minimize the discharge of pollutants from equipment and vehicle washing, wheel wash water, and other wash waters per section 4.1.5? If "No," describe below the measures to be implemented to address deficiencies.	☐ Yes	☐ No
8.	If a concrete washout facility is located on site, is it clearly identified on the project and maintained? If "No," describe below the measures to be implemented to address deficiencies. ■ N/A	☐ Yes	☐ No
9.	Have all previous deficiencies been addressed? If "No," describe the remaining deficiencies in the Comments section. ■ Check if deficiencies/corrective measures have been reported on a previous form.	☐ Yes	■ No

Read each question carefully and answer accordingly.

Pay close attention to questions 5 and 7. These questions are to only be answered if they apply to the project being inspected. Question 8, however, does have a check box labeled "N/A" to indicate it does not apply.

Comment Section. If the answer is "No" for any of the above, please describe the problem and corrective actions to be taken. Otherwise, describe any pertinent observations:

see attached

Comments Section: Insert the following text in this section, "See attached." All TDOT EPSC inspection will also include a second sheet that will contain all recommendations, future maintenance items and observations.

Certification and Signature (must be signed by the certified inspector and the permittee per Sections 3.5.8.2 (g) and 7.7.2 of the CGP)		
I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision. The submitted information is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.		
Inspector Name and Title:	Signature:	Date:
Primary Permittee Name and Title:	Signature:	Date:

Both the EPSC inspector and the primary permittee are to sign every EPSC inspection report. Please note that the primary permittee will always be the site owner/developer (i.e., TDOT).

4.2: TDOT EPSC Inspection Report

This form is a departmental form that is used to document all observations and recommendations noted during the EPSC inspection. An example of a completed TDOT EPSC Inspection Report can be found on page 32. A blank copy of TDOT's form can also be found in Appendix D.

Please note that each outfall will have at least one main entry on the report. This main entry can have subentries if necessary to describe or request actions within the outfall's drainage area.

Outfall # / STR or WTL #: Enter the appropriate outfall, stream, or wetland number associated with the recommendation or observation being made.

Entry Type: Enter the appropriate code that corresponds to the type of recommendation being made.

App. Station# From/To: Enter the station number(s) that represent the area where the recommendation is to occur. This may be a single point on the project, or it can be an area that covers several acres.

Date Last Disturbed: Enter the date that the area of concern was last disturbed by construction activities. If the entire drainage area is being disturbed by an activity, then the date it was last disturbed only needs to be put in the main entry for that outfall and not subsequent subentries.

Some drainage areas are large enough that portions of the outfall's drainage area will be inactive while other areas remain active. In

these cases, subentries will need to be added under the outfall's main entry in order to keep track of disturbance date.

Stabilization Date / Type: Enter the date that an area was either temporarily or permanently stabilized. Also indicate whether the stabilization was temporary or permanent.

Action Code: Enter in the appropriate action code that represents the recommendation being made.

Action Required/Clarification: Enter in any clarification need to better clarify the recommendation being made.

Object. Color Contrast: Indicate by placing "Y" if an objectionable color contrast was observed.

Sed. Release: Indicate by placing "Y" if a sediment release was observed.

TN TDOT Department of Transportation

EPSC Inspection Report

State/US Route or Road Name: SR-15 from west of county line to east of SR-12 Inspection Date: 11-13-14

Contract #: CNN123 PIN: 123456.02 County: Wayne TNR# 123456

Did the contractor accompany the EPSC inspector on the inspection as required by SP107FP? Yes ■ No ☐

Does the contractor agree with the findings noted below and on the attached TDEC form CN-1173 dated 11-13-14 ?
Yes ■ No ☐ If no, it is the responsibly of the contractor to provide written comments that detail their disagreement with the noted findings.

Number of Corrective Actions	3
Number of Recurring Corr. Acts.	1
Number of Sediment Releases	1

Contractor's Signature: _____ Date: _____

Outfall # / STR or WTL #	Entry Type	App. Station # From/To	Date Last Disturbed	Stabilization Date / Type T = Temporary P= Permanent		Action Code	Action Required / Clarification	Object. Color Contrast (Y)	Sed. Release (Y)
1		45+50 L	11-13-14						
2	CA	60+00 R	10-31-14			U	increase enhanced rock check dam (ERCD) to one foot below edge of ditch		
3		78+40 L	11-13-14					Y	
	CA	76+50 L				I	Add additional ERCD at proper spacing in ditch		
	FM	76+50 L				CL	clean out ERCD by 11-18; capacity reduced and rain predicted on 11-19		
	CA	80+50 L	11-10-14			SR	remove sediment past silt fence off ROW (no stream/wetland impact)		Y
4	RCA	105+80 R	10-15-14	10-25-14	T	TS	reapply seed and mulch; originally noted on 11-10-14		
STR-1	FM	110+50 R				LIT	culvert construction area needs litter/debris picked up		

Entry Type Codes

CA	Corrective Action
RCA	Recurring Corrective Action
FM	Future Maintenance

Action Codes

CE	Install construction entrance/exit	DIV	Install diversion	R	Repair/Replace measure	U	Upgrade measure
CL	Clean out measure	HV	Install high visibility fence	REM	Remove measure	W	Too wet to work
CO	Outfall is closed	I	Install measure	SR	Clean up sediment release*		
CW	Install concrete washout	LIT	Pick up litter/debris	TRAC	Clean off tracking from road		
DC	Implement dust control	PS	Permanently stabilize area	TS	Temporarily stabilize area		

*Approval from TDEC is needed prior to removal of sediment from a stream or wetland.

Example of a completed TDOT EPSC Inspection Report

4.3: Photographic Documentation

The “photo log” is intended to photographically document any recommendation or observation being made in the TDOT EPSC Inspection Report form. Each photograph should be accompanied with the following information:

- Photo #
- Station #
- Outfall #
- Comments (such as direction of photo and reason for photo)
- Recommendation/Observation (describe the recommendations being made or observation being noted)

An example of a “photo log” is provided below. Please note that graphics such as arrows, circles, text boxes go a long way in explaining the photograph.

TN TDOT Department of Transportation

EPSC Inspection Photo Log
Interstate 40, Davidson County
CNN123; PIN 123456.02
Inspection Date: 11-13-14

EPSC Inspection Photo Log	
	**Photo #:** 1 **Outfall / Station #:** OF#14, 23+50 Rt. **Comments:** Standing at Charlotte Avenue and I-40 intersection looking south towards Church Street **Recommendations:** Remove material that has been tracked onto highway
	**Photo #:** 2 **Outfall / Station #:** Off site **Comments:** Bulletin board at contractor's off-site office. **Recommendations:** A copy of the NOC and contact information needs to be placed somewhere within the actual project limits as indicated on the SWPPP
	**Photo #:** 3 **Outfall / Station #:** OF#14 24+75 Rt. **Comments:** Looking east down Charlotte Avenue towards the Capital **Recommendations:** Monitor piles of material to ensure they are not inactive for longer than 14 days

1 of 1

Form Revised 07-2015

4.4: Monthly Rainfall Log

Rainfall depths and durations that are obtained from either the on-site rain gauge(s) or off-site reference locations must be recorded on TDOT's Monthly Rainfall Log. The Monthly Rainfall Log must be kept with the SWPPP and EPSC inspection reports.

The following information must be recorded on the Monthly Rainfall Log.

Date and Day of Week: The first two columns are self-explanatory. Enter the days of the month and the corresponding day of the week.

Predicted Precipitation: Insert the rainfall prediction in the third column. Rainfall prediction shall be based upon a website reporting weather forecasts from NOAA or National Weather Service (NWS), or other local news station. Enter the predicted rainfall for the next two days after the current inspection. For example, if the first weekly EPSC inspection is on Monday, record predicted rainfall forecasts for Monday (day of inspection), Tuesday and Wednesday. If the second weekly EPSC inspection is on Thursday, record predicted rainfall forecasts for Thursday (day of inspection), Friday, Saturday and Sunday. All of the rainfall predictions should be from the same source (i.e., do not change rainfall prediction sources during the month).

Rainfall Gauge: Rain gauges are to be read every morning around the same time. Since the majority of the precipitation in the gauge fell during the previous work day and night time, the reading would be documented as the previous day's rainfall data.
For example, TDOT personnel read gauge #1 has having 1.2 inches on Wednesday morning. The 1.2 inches would be noted as Tuesday's rainfall data.

Duration: Record the duration of the rain event in hours. The duration may be estimated by tracking or estimating start and end times for the rain event. If the rain fell during the night, the person's best judgment should be used or a website reporting weather data from NOAA or NWS should be used to estimate the duration.

The following is an example of a Monthly Rainfall Log that has been completed for a partial month. A blank copy of the Monthly Rainfall Log can be found in Appendix B.

TN TDOT Department of Transportation

Monthly Rainfall Log **September**

State/US Route or Road Name: SR-70 Davidson County

Construction #: 12-2346-99 Contract #: CNN123

Date	Day of Week[1]	Predicted Precipitation (%)[2]	Rainfall Gauge 1 (in)	Rainfall Gauge 2 (in)	Rainfall Gauge 3 (in)	Rainfall Gauge 4 (in)	Rainfall Gauge 5 (in)	Rainfall Gauge 6 (in)	Duration (hr)
1	Su	40	.25[2]	.30[2]	.15[2]				2.5[2]
2	M	10	0	0	0				
3	Tu	30	0	0	0				
4	W	60	1.5	1.1	1.32				12
5	Th	0							
6	F	40							
7	Sa	0							
8	Su	20	0.5[2]	0.9[2]	0.7[2]				72[2]
9	M	0	0	0	0				
10	Tu	20	1.2	1.0	0.8				8[3]
11	W	40	0	0	0				
12	Th	50	0.9	1.1	1.4				6
13	F	0							
14	Sa	0							
15	Su	0							
16	M	0							
17	Tu	0							
18	W	0							
19	Th								
20	F								
21	Sa								
22	Su								
23	M								
24	Tu								
25	W								
26	Th								
27	F								
28	Sa								
29	Su								
30	M								
31									

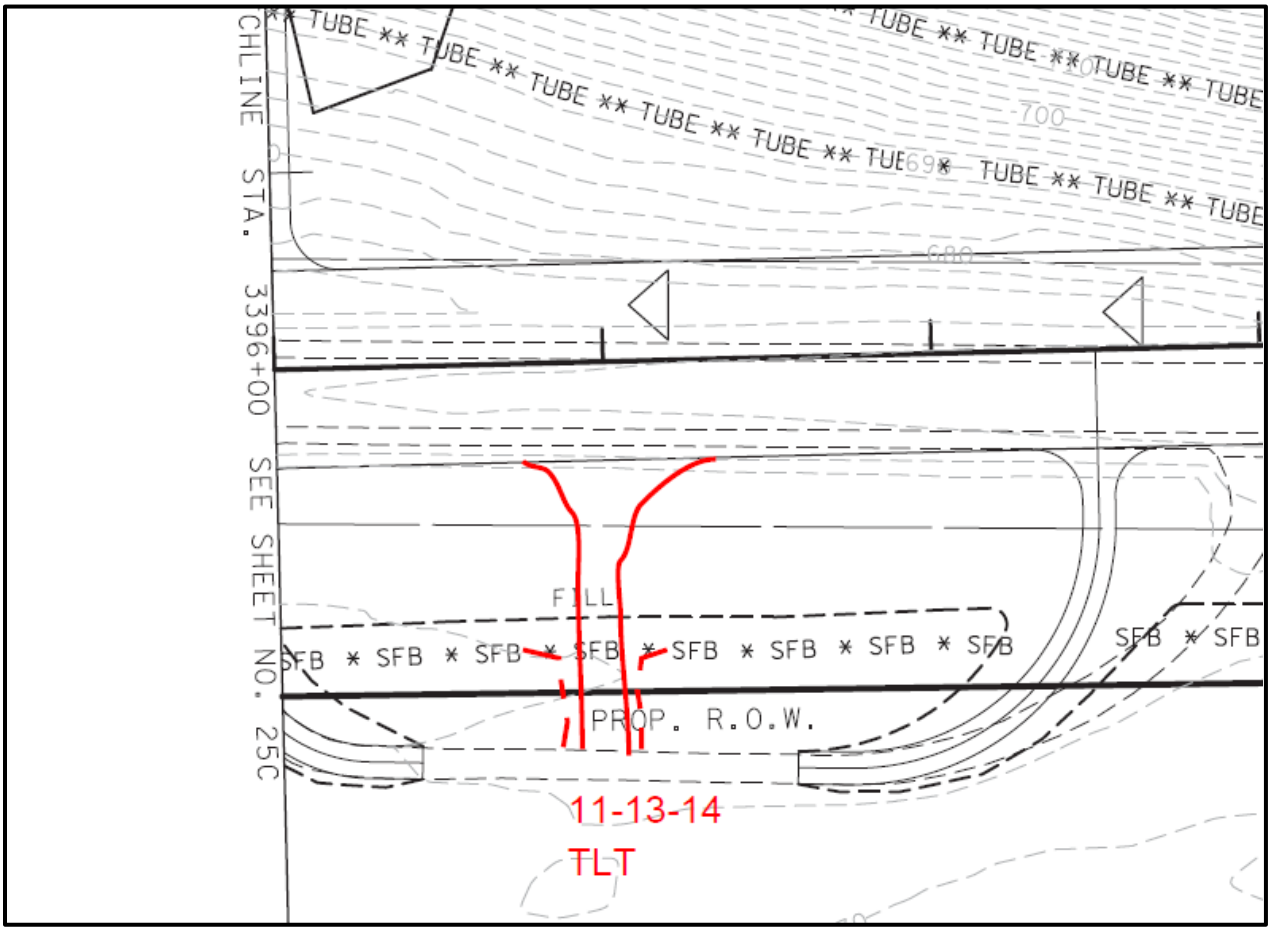
[1] Day of Week= Su,M,Tu,W,Th,F,Sa
[2] Predicted Precipitation Source: NOAA
[3] Reference site source: TVA – Tims Ford Dam
R = Gauge Removed

Monthly Rainfall Log Example

4.5: SWPPP Modifications

SWPPP modification will be documented by marking-up the official project-specific SWPPP. Marking-up the SWPPP can apply to both the EPSC narrative and EPSC plans. When modifications are warranted, the EPSC inspector will simply draw in the changes, date them, and then initial the changes. Below are some examples of how SWPPP modifications are to be made.

It is recommended that the SWPPP be marked up with a colored pin (e.g., red, blue, etc.) so that changes are easily noticed.



Example of EPSC plans modified to add an additional driveway.

The dates noted on the modifications should correspond to the EPSC inspection date the details the changes.

Section 5 – Posting the Report

Every EPSC inspection should be documented and posted to the department's stormwater server within 48 hours of the inspection. Storing the EPSC inspection documents on the department server allows for safe storage and easy access throughout the life of the project. The following steps are to be followed in order to post the documents in the correct location and format.

Please note that the TDEC form, TDOT inspection report, photo log, and rainfall data log are the only documents required to be stored on the server.

EPSC inspection reports must be completed and uploaded to the department server within 48 hrs. of completing the EPSC inspection.

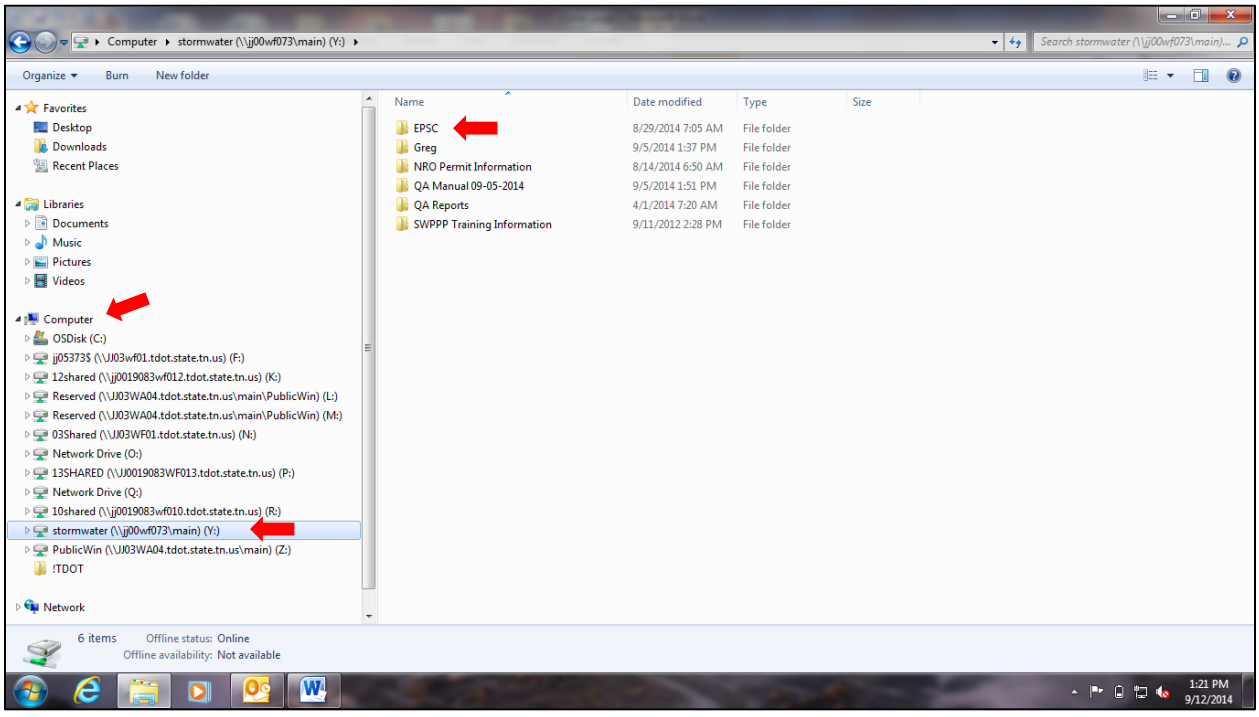
5.1: Posting to the Stormwater Drive

The signed TDEC form, TDOT EPSC Inspection Report, Photo Log, and Rainfall Data Log must be scanned into PDF format prior to being posted to the stormwater drive.

Locating the Stormwater Drive:

The stormwater drive will have the path name equal to "jj00wf073\main." The drive name (i.e., Q, R, S, etc.) under which your stormwater drive will be located will be dependent on how the server was mapped during the initial setup.

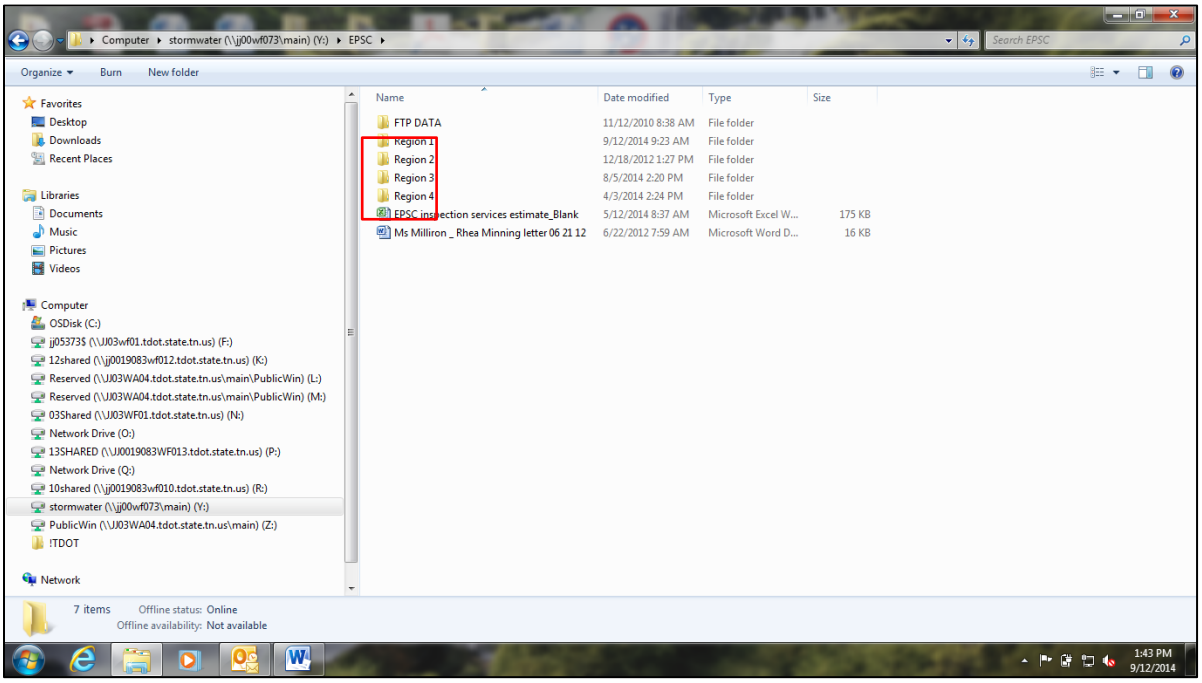
Consultants will have to access the drive via a VPN account.

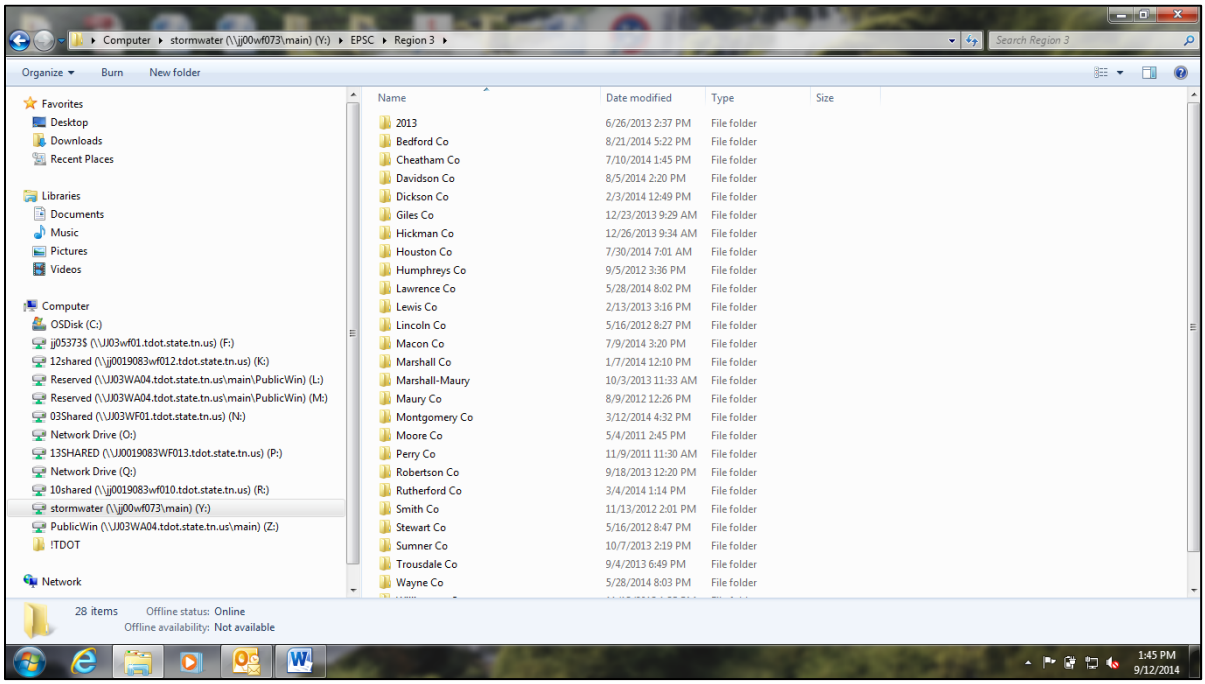


Locating the Correct Folder:

The stormwater drive will include a folder labeled “EPSC.” This folder will house all EPSC inspection documentation.

Inside the “EPSC” folder there will be a folder for each Region. Each Region folder will house a folder for each county in that Region.





Each county folder will house a folder for each project in that county. The EPSC inspector will have to navigate to the correct project folder in order to post the inspection documentation. Once the correct project folder has been located, the PDF of the inspection documents can be uploaded.

Naming Convention for Documentation**:**

Each project folder must be named in the following manner: Contract#_State Route#. For example, a project folder name for a project with a contract number CNN123 in Anderson County on SR-12 would be "CNN123_SR-12". Of course, this folder would be housed under the Anderson County folder for Region 1.

Every inspection documentation PDF will need to be labeled in the following manner: Date_Contract#_EPSC inspection. For example, the Anderson County project noted above would have inspection documentation labeled, "11-13-14_CNN123_EPSC inspection." Having the date first will allow for all reports to be listed in chronological order in the folder. Projects that last over a year in length or span two separate calendar years will need to have the reports organized by year.

Section 6 – Reducing the EPSC Inspection Frequency

6.1: When is it appropriate to reduce EPSC inspection frequency?

According to the CGP, a reduction in the EPSC frequency can only be done when one of the following criteria is met:

- sites or portion(s) of construction sites have been temporarily stabilized,
- or runoff is unlikely due to winter conditions (e.g., site covered with snow or ice) or due to extreme drought.

These are the only criteria that can be utilized to reduce the EPSC frequency on a construction project site. If one of these criteria is met, the EPSC inspection frequency can be reduced to once per month.

Typically, EPSC inspection frequency on a TDOT construction project is reduced when all construction activities are completed and permanent vegetation is trying to be achieved.

6.2: What is the process?

Once the criteria noted above have been met, the reduction process can begin. That process is as follows:

- Draft a letter indicating that EPSC inspection frequency can be reduced to monthly, specifying the reason for reduction The letter should also include the a project description, county, PIN, and NPDES tracking number, project number, contract number, and contractor. Photographs of the stabilized areas should be included with the letter.
- The construction office-supervisor or appropriate person according to the Region policy will review the letter and subsequently forward the request to TDEC's Central Office in Nashville. The Environmental Coordinator and Stormwater Coordinator should be copied on the correspondence to TDEC.
- Mark the areas in questions on the project SWPPP.
- Note on the SWPPP that EPSC inspections have been reduced to monthly and the date on which the reduction took place.

Once the request for reduction in EPSC inspections has been sent to TDEC, EPSC inspections can be reduced. No response or confirmation from TDEC is needed. If the project reactivates or site conditions change, the EPSC inspection frequency must return to twice weekly. EPSC inspections must continue on the project site until the NOT is submitted to the TDEC.

Section 7 – Closing out the Project

7.1: What is final stabilization?

As defined in the CGP, final stabilization means that all soil disturbing activities at the site have been completed and one of the three following criteria is met:

- A uniform (e.g., evenly distributed, without large bare areas) perennial vegetative cover with a uniform density of at least 70 percent of the (preferably) native vegetative cover for the area has been established on all unpaved areas and areas not covered by permanent structures, and all slopes and channels have been permanently stabilized against erosion, or

- Equivalent permanent stabilization measures (such as the use of riprap; permanent geotextiles, hardened surface materials including concrete, asphalt, gabion baskets, or Reno mattresses) have been employed, or

- For construction projects on land used for agricultural or silvicultural purposes, final stabilization may be accomplished by returning the disturbed land to its preconstruction agricultural or silvicultural use.

7.2: Who makes the call on final stabilization?

At the end of the construction project when all areas have been permanently stabilized and construction related stormwater discharges have ceased, the site's coverage under the CGP can be terminated through submission of the Notice of Termination (NOT) to TDEC. The EPSC inspector's role in the NOT process is to determine and document permanent stabilization on all areas through the project.

When, from the projects standpoint, final stabilization has been achieved, the QA auditor is notified and performs an audit of the project. If the QA auditor concurs, with the EPSC inspector, that final stabilization has been achieved, the QA auditor will include a statement of concurrence in the final QA report.

7.3: Submitting the NOT

Submittal of the NOT, for a site, is the final step in the EPSC inspection process. The NOT notifies TDEC that the all construction is complete and the site has reached final stabilization. It also closes out the active NOC in TDOT's name. Once this concurrence from the QA auditor has been obtained regarding final stabilization, the NOT can be completed and submitted to TDEC. The NOT is submitted by the TDOT Regional Director of Operations or their designee. If TDEC rejects the NOT, the EPSC inspections on the project must be continued until the NOT is accepted.

Please keep in mind that the “Waste and Borrow Manual” states that the TDOT construction project cannot have final acceptance until the contractor’s waste or borrow site has reached final stabilization and the NOT, for the waste or borrow site, has been submitted to TDEC.

APPENDIX A

Rainfall Intensity

Rainfall Intensity

The CGP also allows for rainfall intensity to be considered when determining if a rain fall event has exceeded the design storm event. In order to determine if the rainfall event in question is equivalent to or has exceeded the 2-yr. / 24 hr. or 5-yr. / 24 hr. storm event, the documented rainfall depth and duration must be compared to the National Oceanic and Atmospheric Administration's (NOAA) "Precipitation Frequency Estimates" table for a particular area. These tables allow for a quick and easy determination on whether or not a storm event in question is considered equal to or greater than the design storm event.

NOAA's "Precipitation Frequency Estimates" tables can be found on their website at http://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html?bkmrk=tn . Please be aware that these frequency tables are location specific. When using the website, make sure the correct location is being used. A copy of the site-specific "Precipitation Frequency Estimates" table can also be found in the project's "Document Binder".

An example of comparing documented rainfall amount and duration from a project to the NOAA tables is provided below. In this situation the SWPPP was developed based on a 2 yr. / 24 hr. storm event. In the example below, the storm event in question can be considered equivalent to the 2 hr. /24 hr. storm event.

Date	Day of Week[1]	Predicted Precipitation (%)[2]	Rainfall Gauge 1 (in)	Rainfall Gauge 2 (in)	Rainfall Gauge 3 (in)	Rainfall Gauge 4 (in)	Rainfall Gauge 5 (in)	Rainfall Gauge 6 (in)	Duration (hr)
2/18/13	Mon	70	2.5	2.3					6 hrs
2/19/13	Tues	0							
2/20/13	Wed	0							
2/21/13	Thur	60	1.8	1.5					12 hrs
2/22/13	Fri	80	0.5	0.8					24
2/23/13	Sat	0							
2/24/13	Sun	0							

2 yr.

5 yr.

Compare the documented rainfall (2.5 in.) and duration (6 hrs.) to the frequency tables (2.52 in.).

Precipitation Frequen

Duration	Average recurre						
	1	2	5	10	25	50	100
5-min	0.244	0.294	0.369	0.434	0.531	0.614	0.706
10-min	0.427	0.515	0.646	0.759	0.929	1.08	1.24
15-min	0.610	0.735	0.923	1.08	1.33	1.54	1.77
30-min	0.854	1.03	1.29	1.52	1.86	2.15	2.47
60-min	1.22	1.47	1.85	2.17	2.65	3.07	3.53
2-hr	1.43	1.71	2.15	2.52	3.09	3.59	4.14
3-hr	1.63	1.95	2.44	2.87	3.53	4.10	4.75
6-hr	2.11	2.52	3.14	3.68	4.51	5.25	6.07

APPENDIX B

Monthly Rainfall Log Form

Monthly Rainfall Log Month:

State/US Route or Road Name: _____

Construction #: _____ Contract #: _____

Date	Day of Week[1]	Predicted Precipitation (%)[2]	Rainfall Gauge 1 (in)	Rainfall Gauge 2 (in)	Rainfall Gauge 3 (in)	Rainfall Gauge 4 (in)	Rainfall Gauge 5 (in)	Rainfall Gauge 6 (in)	Duration (hr)

[1] Day of Week= Su,M,Tu,W,Th,F,Sa
[2] Predicted Precipitation Source:
[3] Reference site source:
R = Gauge Removed

APPENDIX C

TDEC’s Construction Stormwater Inspection Certification Form

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION (TDEC)
Division of Water Resources
William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243
1-888-891-8332 (TDEC)
General NPDES Permit for Stormwater Discharges from Construction Activities (CGP)

Construction Stormwater Inspection Certification (Twice-Weekly Inspections)

Site or Project Name:			**NPDES Tracking Number: TNR**	
Primary Permittee Name:			Date of Inspection:	
Current approximate disturbed acreage:		Has rainfall been checked/documented daily? ☐ Yes ☐ No	Name of Inspector:	
Current weather conditions:			Inspector's TNEPSC Certification Number:	

Please check the box if the following items are on-site:

☐ Notice of Coverage (NOC) ☐ Stormwater Pollution Prevention Plan (SWPPP) ☐ Twice-weekly inspection documentation

☐ Site contact information ☐ Rain Gage ☐ Off-site Reference Rain Gage Location: _____

Best Management Practices (BMPs):

Are the Erosion Prevention and Sediment Controls (EPSCs) functioning correctly: If "No," describe below in Comment Section			
1.	Are all applicable EPSCs installed and maintained per the SWPPP?	☐Yes	☐No
2.	Are EPSCs functioning correctly at all disturbed areas/material storage areas per section 4.1.5?	☐Yes	☐No
3.	Are EPSCs functioning correctly at outfall/discharge points such that there is no objectionable color contrast in the receiving stream, and no other water quality impacts per section 5.3.2?	☐Yes	☐No
4.	Are EPSCs functioning correctly at ingress/egress points such that there is no evidence of track out?	☐Yes	☐No
5.	If applicable, have discharges from dewatering activities been managed by appropriate controls per section 4.1.4? If "No," describe below the measures to be implemented to address deficiencies.	☐Yes	☐No
6.	If construction activity at any location on-site has temporarily/permanently ceased, was the area stabilized within 14 days per section 3.5.3.2? If "No," describe below each location and measures taken to stabilize the area(s).	☐Yes	☐No
7.	Have pollution prevention measures been installed, implemented, and maintained to minimize the discharge of pollutants from equipment and vehicle washing, wheel wash water, and other wash waters per section 4.1.5? If "No," describe below the measures to be implemented to address deficiencies.	☐Yes	☐No
8.	If a concrete washout facility is located on site, is it clearly identified on the project and maintained? If "No," describe below the measures to be implemented to address deficiencies. ☐ N/A	☐Yes	☐No
9.	Have all previous deficiencies been addressed? If "No," describe the remaining deficiencies in the Comments section. ☐ Check if deficiencies/corrective measures have been reported on a previous form.	☐Yes	☐No

Comment Section. If the answer is "No" for any of the above, please describe the problem and corrective actions to be taken. Otherwise, describe any pertinent observations:

Certification and Signature (must be signed by the certified inspector and the permittee per Sections 3.5.8.2 (g) and 7.7.2 of the CGP)

I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision. The submitted information is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Inspector Name and Title:	Signature:	Date:
Primary Permittee Name and Title:	Signature:	Date:

Construction Stormwater Inspection Certification Form (Twice-Weekly Inspections)

Purpose of this form/ Instructions

An inspection, as described in section 3.5.8.2. of the General Permit for Stormwater Discharges from Construction Activities ("Permit"), shall be performed at least twice every calendar week and documented on this form. Inspections shall be performed at least 72 hours apart. Where sites or portion(s) of construction sites have been temporarily stabilized, or runoff is unlikely due to winter conditions (e.g., site covered with snow or ice), such inspection only has to be conducted once per month until thawing results in runoff or construction activity resumes.

Inspectors performing the required twice weekly inspections must have an active certification by completing the "Fundamentals of Erosion Prevention and Sediment Control Level I" course. (http://www.tnepsc.org/). A copy of the certification or training record for inspector certification should be kept on site.

Qualified personnel, as defined in section 3.5.8.1 of the Permit (provided by the permittee or cooperatively by multiple permittees) shall inspect disturbed areas of the construction site that have not been finally stabilized, areas used for storage of materials that are exposed to precipitation, structural control measures, locations where vehicles enter or exit the site, and each outfall.

Disturbed areas and areas used for storage of materials that are exposed to precipitation shall be inspected for evidence of, or the potential for, pollutants entering the site's drainage system. Erosion prevention and sediment control measures shall be observed to ensure that they are operating correctly.

Outfall points (where discharges leave the site and/or enter waters of the state) shall be inspected to determine whether erosion prevention and sediment control measures are effective in preventing significant impacts to receiving waters. Where discharge locations are inaccessible, nearby downstream locations shall be inspected. Locations where vehicles enter or exit the site shall be inspected for evidence of offsite sediment tracking.

Based on the results of the inspection, any inadequate control measures or control measures in disrepair shall be replaced or modified, or repaired as necessary, before the next rain event if possible, but in no case more than 7 days after the need is identified.

Based on the results of the inspection, the site description identified in the SWPPP in accordance with section 3.5.1 of the Permit and pollution prevention measures identified in the SWPPP in accordance with section 3.5.2 of the Permit, shall be revised as appropriate, but in no case later than 7 days following the inspection. Such modifications shall provide for timely implementation of any changes to the SWPPP, but in no case later than 14 days following the inspection.

All inspections shall be documented on this Construction Stormwater Inspection Certification form. Alternative inspection forms may be used as long as the form contents and the inspection certification language are, at a minimum, equivalent to the division's form and the permittee has obtained a written approval from the division to use the alternative form. Inspection documentation will be maintained on site and made available to the division upon request. Inspection reports must be submitted to the division within 10 days of the request.

Trained certified inspectors shall complete inspection documentation to the best of their ability. Falsifying inspection records or other documentation or failure to complete inspection documentation shall result in a violation of this permit and any other applicable acts or rules.

APPENDIX D

TDOT EPSC Inspection Report Form

TN TDOT Department of Transportation

EPSC Inspection Report

State/US Route or Road Name: _____ Inspection Date: _____

Contract #: _____ PIN: _____ County: _____ TNR#

Did the contractor accompany the EPSC inspector on the inspection as required by SP107FP? Yes ☐ No ☐

Does the contractor agree with the findings noted below and on the attached TDEC form CN-1173 dated _____ ?

Yes ☐ No ☐ If no, it is the responsibly of the contractor to provide written comments that detail their disagreement with the noted findings.

Contractor's Signature: _____ Date: _____

Number of Corrective Actions	
Number of Recurring Corr. Acts.	
Number of Sediment Releases	

Outfall # / STR or WTL #	Entry Type	App. Station # From/To	Date Last Disturbed	Stabilization Date / Type T = Temporary P= Permanent		Action Code	Action Required / Clarification	Object. Color Contrast (Y)	Sed. Release (Y)

Entry Type Codes

CA	Corrective Action
RCA	Recurring Corrective Action
FM	Future Maintenance

Action Codes

CE	Install construction entrance/exit	DIV	Install diversion	R	Repair/Replace measure	U	Upgrade measure
CL	Clean out measure	HV	Install high visibility fence	REM	Remove measure	W	Too wet to work
CO	Outfall is closed	I	Install measure	SR	Clean up sediment release*		
CW	Install concrete washout	LIT	Pick up litter/debris	TRAC	Clean off tracking from road		
DC	Implement dust control	PS	Permanently stabilize area	TS	Temporarily stabilize area		

*Approval from TDEC is needed prior to removal of sediment from a stream or wetland.

TN TDOT Department of Transportation

Contract #: _____ SR/US Road Name: _____ County: _____ Inspection Date: _____

TNR# _____

Outfall # / STR or WTL #	Entry Type	App. Station # From/To	Date Last Disturbed	Stabilization Date / Type T = Temporary P= Permanent		Action Code	Action Required / Clarification	Object. Color Contrast (Y)	Sed. Release (Y)

Please refer to the first sheet for Entry and Action Codes

APPENDIX E

Notice of Termination Form

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION (TDEC)
Division of Water Resources
William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243
1-888-891-TDEC (8332)

Notice of Termination (NOT) for General NPDES Permit for Stormwater Discharges from Construction Activities (CGP)

This form is required to be submitted when requesting termination of coverage from the CGP. The purpose of this form is to notify the TDEC that either all stormwater discharges associated with construction activity from the portion of the identified facility where you, as an operator, have ceased or have been eliminated; or you are no longer an operator at the construction site. Submission of this form shall in no way relieve the permittee of permit obligations required prior to submission of this form. Please submit this form to the local DWR Environmental Field Office (EFO) address (see table below). For more information, contact your local EFO at the toll-free number 1-888-891-8332 (TDEC).

Type or print clearly, using ink.

Site or Project Name:	**NPDES Tracking Number: TNR**
Street Address or Location:	County(ies):

Name of Permittee Requesting Termination of Coverage:			
Permittee Contact Name:	Title or Position:		
Mailing Address:	City:	State:	Zip:
Phone:	E-mail:		

Check the reason(s) for termination of permit coverage:

☐	Stormwater discharge associated with construction activity is no longer occurring and the permitted area has a uniform 70% permanent vegetative cover OR has equivalent measures such as rip rap or geotextiles, in areas not covered with impervious surfaces.
☐	You are no longer the operator at the construction site (i.e., termination of site-wide, primary or secondary permittee coverage).

Certification and Signature: (must be signed by president, vice-president or equivalent ranking elected official)

I certify under penalty of law that either: (a) all stormwater discharges associated with construction activity from the portion of the identified facility where I was an operator have ceased or have been eliminated or (b) I am no longer an operator at the construction site. I understand that by submitting this notice of termination, I am no longer authorized to discharge stormwater associated with construction activity under this general permit, and that discharging pollutants in stormwater associated with construction activity to waters of the United States is unlawful under the Clean Water Act where the discharge is not authorized by a NPDES permit. I also understand that the submittal of this notice of termination does not release an operator from liability for any violations of this permit or the Clean Water Act.

For the purposes of this certification, elimination of stormwater discharges associated with construction activity means that all stormwater discharges associated with construction activities from the identified site that are authorized by a NPDES general permit have been eliminated from the portion of the construction site where the operator had control. Specifically, this means that all disturbed soils at the portion of the construction site where the operator had control have been finally stabilized, the temporary erosion and sediment control measures have been removed, and/or subsequent operators have obtained permit coverage for the site or portions of the site where the operator had control.

I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision. The submitted information is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Permittee name (print or type):	Signature:	Date:

EFO	**Street Address**	**Zip Code**	**EFO**	**Street Address**	**Zip Code**
Memphis	8383 Wolf Lake Drive, Bartlett, TN	38133	Cookeville	1221 South Willow Ave.	38506
Jackson	1625 Hollywood Drive	38305	Chattanooga	1301 Riverfront Parkway, Ste. 206	37402
Nashville	711 R S Gass Boulevard	37243	Knoxville	3711 Middlebrook Pike	37921
Columbia	1421 Hampshire Pike	38401	Johnson City	2305 Silverdale Road	37601