TN TDOT Department of Transportation

EPSC Inspection Manual






January 2022

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 EPSC inspections conducted on active TDOT construction projects 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, permits, and TDOT guidance documents.

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, mitigation areas etc.).
- Determine if there are compliance issues with the applicable environmental regulations, permits, or departmental guidance documents.
- 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 are EPSC inspections required?

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

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

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 followed 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 must obtain coverage under the CGP prior to discharging stormwater from that site (CGP 1.2.1). Therefore, all TDOT construction projects that require coverage under the CGP will also require EPSC inspections.

Projects that disturb one (1) acre or 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 5.5.3.11 (a)). It is important to note that an EPSC inspection frequency must meet both 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 inspections must still be performed during that week. For example, an inspector may typically conduct inspections on Tuesday and Friday of each week. The next week's Friday is a federal holiday. To meet the requirements, set forth in the CGP, this inspector will have to either perform inspections on Monday and Thursday or conduct them on Tuesday and Saturday. Since inspections are to be at least 72 hours apart, the first weekly inspection of the following week must be at least 72 hours after the Saturday inspection (i.e., Tuesday).

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

Scenario #1 = Correct 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 inspection took place on that day of the week

Scenario #2 = Incorrect 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 inspection took place on that 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 reduced under certain circumstances. Section 6 of this Manual can be referenced for additional details on which circumstances allow for reduction in inspection frequency and the process that must be followed.

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 (5.5.3.10), 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) or the TDOT Fundamentals of EPSC Training Class and maintain a valid certification,
- Have a valid Professional Engineer or Landscape Architect license,
- Are a Certified Professional in Erosion and Sediment Control (CPESC), or
- Have successfully completed the Level II Design Principles for Erosion Prevention and Sediment Control for Construction Sites course.

In accordance with a Memorandum of Agreement between TDOT and the Tennessee Department of Environment and Conservation (TDEC) dated March 7, 2019, any TDOT employee who successfully completes TDOT's Fundamentals of Erosion Prevention and Sediment Control Training Program is considered certified to perform EPSC inspections on TDOT projects. This Certification only applies for the duration of the employee's tenure with TDOT.

1.6: Who must attend an EPSC inspection?

For an EPSC inspection to be as effective as possible, the contractor, as required in SP107FP, and construction inspector must accompany the EPSC inspector on all EPSC inspections. The contractor's and construction inspector's participation are 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 inspection, documenting the inspection, and distributing each 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.

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

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.

SP 107FP 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 of the entire construction site. 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 must have the TDEC Level I certification.

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 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 2.1.1)". As the primary permittee (owner/developer), the CGP states in Section 2.2.2 that a primary permittee is, "responsible for compliance with all applicable terms and conditions of this permit as it relates to their activities…including, but is not limited to, implementation of Best Management Practices (BMPs) and other controls required by 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 inspection 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.

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

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 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, Stormwater Pollution Prevention Plan (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 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 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/Mitigation: 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. There should also be information regarding on-site mitigation, if required This would include information on the type of mitigation, location of the work, structures involved, vegetation requirements, and signage.

- 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.

Outfall – is a point where runoff leaves the site as concentrated flow in a discrete conveyance (i.e., ditch, pipe, swale, etc.) off ROW or into a stream or wetland.

2.1.2: Stormwater Pollution Prevention Plan (SWPPP)

TDOT SWPPPs are comprised of two documents: Narrative (CGP 5.5.1) and EPSC plan sheets (CGP 5.5.2)

- Narrative: This document provides language which describes 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 needs to be reviewed prior to construction.
  - description of construction activities
  - estimated area of the site and area expected to be disturbed
  - description of site conditions and drainage areas for each outfall
  - hydric soils present on site
  - identification of streams, description of impacts, and permit numbers
  - names of receiving waters
  - identification of receiving waters with unavailable parameters or ETW's
  - buffer zones
  - description of construction phasing
  - timing of the vegetative cover if used as a control measure
- EPSC Plans: EPSC plans are engineering drawings that depict the staging and location of all EPSC measures. Most projects will have three separate EPSC plan sheets.
  - The first plan sheet will address the EPSC measures necessary to manage stormwater runoff, erosion, and sediment during the initial land disturbance (grading) stage.
  - A second plan sheet will address the EPSC measures necessary to manage stormwater runoff, erosion and sediment during any interim grading and construction stages.
  - The third plan sheet will address the EPSC measures necessary to manage stormwater runoff, erosion, and sediment during the final grading stage while permanent site stabilization is being achieved.

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.

- approximate locations of each control measure and when the measure will be implemented in the construction process
- the different stages of construction and the EPSC measures to be utilized during each stage

2.1.3: Water Quality Permits

Water quality permits refer to the permits issued for the specific physical alteration of streams and wetlands within a project. 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 must be familiar with prior to construction.

To determine all restrictions and conditions that must be met during construction, TDOT's application for all water quality permits (i.e., ARAP, 404, and 26a) should be reviewed. When an application is submitted to the resource 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, on-site mitigation, mitigation monitoring reports etc.). Sometimes, 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. Review all issued permitting to determine if any self-imposed restrictions have been incorporated.

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 to avoid delay in construction.

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

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 must be made to TDOT's Permits Section **within 6 months of the permit expiring**.

Permit Matrix:

Since several documents must be reviewed to determine what is required of TDOT during construction, it is highly 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 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.
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. In general, any deviation from what is described in the permits will require a permit modification. For assistance in determining how to address this deviation, please contact the Regional Environmental Technical Office, or permit writer from TDOT's Permits Section to determine the best plan of action. This contact must be made as soon as possible to make them aware of the situation.
2. If it is determined that a permit modification is warranted, follow the steps outlined in Circular Letter (CL) 107.08-01 "Protection of Streams, Lakes and Reservoirs".

2.2: Preconstruction Meeting

Prior to construction starting, a preconstruction meeting must be held (Standard Specification (SS) 209.05). If a project disturbs one or more acres or has environmental permits, an environmental preconstruction meeting will be held. This meeting will be held at the discretion of the TDOT District Office Supervisor. The preconstruction meeting and the environmental preconstruction meeting may take place at the same time or at two separate meetings.

A preconstruction meeting allows for all pertinent information that 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 District Office Supervisor conducts the preconstruction meeting and discusses the objectives below with all present. However, an EPSC inspector needs to consult with the TDOT District Office Supervisor to confirm who will discuss what objectives.

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

- Remind the contractor of their responsibilities under Special Provision 107FP (if applicable under the contract).
- 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.
- Obtains any additional permits required by the Contractor for off-site waste and/or borrow areas and associated off project work areas.
- Signs the Notice of Intent (NOI) form, provided by the Department, indicating acceptance of the stipulations contained in the permit. Submit the signed NOI to the TDOT HQ Construction Division by email within 10 calendar days after submittal of the contract proposal or the Department may at its discretion cancel the award with the Contractor forfeiting the bid bond.
- Implements the provisions of the Water Quality and Stormwater Permits and requirements that pertain to construction activities.
- Reviews permits, including NPDES Permit, the site specific SWPPP, the contract plans, Standard Specifications and contract Special Provisions and erosion prevention and sediment control (EPSC) plans.

- 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 the TDOT Regional Operations Engineer.
- The Contractor shall not be released from any warranty provided for EPSC plantings, including sod and trees.
- The contractor (or representative) who holds a current TDEC "Fundamentals of Erosion Prevention and Sediment Control Level I" certification shall accompany the TDOT EPSC inspector on all required EPSC inspections. The project supervisor(s) shall also hold a current TDEC "Fundamentals of Erosion Prevention and Sediment Control Level I" certification. Proof of required personnel training for the individual(s) shall be provided to the TDOT District Supervisor prior to beginning of construction.
- The contractor's project supervisor shall also hold a current TDEC *Fundamentals of Erosion Prevention and Sediment Control Level 1* certification.
- Sign the TDOT EPSC Inspection Report form and any supporting documentation indicating that there is agreement with the report, recommendations and repair schedule as stated in the documentation.
- Make necessary maintenance and repairs relative to deficiencies in these permit conditions or requirements within 24 hours after an inspection identifies the maintenance or repair need, and/or as directed by the TDOT District Supervisor, unless conditions make a particular activity impracticable. Any such conditions that make immediate repairs impracticable shall be documented on the inspection report and provided to the TDOT District Supervisor and be accompanied by an expected repair schedule based on forecasted weather conditions.
- In the event a Notice of Noncompliance, Notice of Violation, Notice of Deficiency, or Order is issued by any State or Federal Agency on this project, any required corrective action and all fine will be the sole responsibility of the Contractors.
- Failure to comply or take immediate corrective actions required within 24 hours, unless documented conditions make a particular maintenance or repair activity impracticable immediately, shall be reason for the TDOT District Supervisor to suspend all other work on the Project, except EPSC and traffic control. The Department will apply 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 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.
- Make the contractor aware of any on-site mitigation and associated requirements and special conditions.
- 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 because 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 two weeks. Steep slopes (35% or greater) must be stabilized within one week 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 managed by appropriate controls (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 contractor and utility contractor(s) to CL 209.01-5 *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 (SS 209.06).
  - Project bulletin board has been installed, as discussed in Circular

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

Letter 1273-01 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, overlooked environmental or drainage features, or new construction that has occurred since the plans were designed/developed.

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), QA Inspector (TDOT staff or consultant) or representative(s) of the Regional Environmental Technical Office.

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 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 and highly recommended 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 during construction. Pictures taken during the preconstruction walk through should be documented on the "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, Lawrence County
CNN123, 123456.02
Date: 4-25-13

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.**

1 of 2

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 District Office Supervisor know as soon as possible. If unidentified streams or wetlands were encountered, the Regional Environmental Technical Office needs to be notified immediately so coordination with the Environmental Division Permitting and Ecology Sections can begin. If issues are identified in the field, include project QA Inspector on any communication.

Section 3 – Conducting the Inspection

3.1: Pre-inspection Preparation

3.1.1: Document Review

Preparation for an 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, on-site mitigation, 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 inspection.
- Previous EPSC report – review past recommendations and problem areas which will aid in directing your 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 for the preconstruction meeting can be used as a reference tool.

3.1.2: Equipment needed for each 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 (as required by Departmental Policy 305-01)
  - Hard hat
  - Class III safety vest
  - Eye and hearing protection when required
  - Appropriate footwear
- Roadway plans
- SWPPP
- Permit Matrix
- Blank copies of the EPSC inspection report
- Previous inspection reports

It is highly recommended that some type of camera, digital or work cell phone, be included with the equipment necessary to conduct an EPSC inspection.

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 inspection. This will make an inspector aware of new areas to inspect.
- Obtain daily rainfall data.
- 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.
- Obtain the contractor's construction schedule for the next couple of days, so a portion of the inspection can be spent reviewing these areas for any potential concerns.
- Identify any problem areas that need extra attention during the inspection.

3.3: How do you approach an inspection?

Due to the linear nature of roadway projects and the fact that they can often 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 terminus). Starting an 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. When the inspector comes upon a permitted water quality impact site, they will inspect that site and continue inspecting the remaining outfalls and drainage areas.

3.4: What to look for during an 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 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 7.2.1).

- A copy of the NOC with the NPDES permit tracking number for the construction project.
- A name or company name; E-mail address (if available); telephone number and address of the project site owner/operator or a local contact person.
- The location of the SWPPP.

3.4.2: Items maintained on site

The CGP requires that the following items be kept on site or other location accessible throughout the life of the project (CGP 7.2.1).

- A rain gauge (or use a reference site for a record of daily precipitation) and accurate rainfall records,
- A copy of all required inspection reports,
- Records of the dates when major grading activities occur, when construction activities temporarily or permanently cease on a portion of the site, and when stabilization measures are initiated.

3.4.3: Disturbed Acreage

A determination must be made regarding the allowable disturbed acreage associated with the project. The project specific SWPPP the maximum disturbed acreage allowed during the life of the project. Most TDOT projects will be kept to a total disturbed area of less than 50 acres at any one time. However, there may be unique projects that will exceed this 50-acre disturbance threshold. If this occurs, then the requirements specified in CGP 5.5.3.3 would apply.

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

3.4.4: Outfall Points

All active outfalls must be inspected to determine if EPSC measures are effectively controlling erosion and preventing sediment from leaving the construction site (CGP 5.5.3.11(d)). This means that an inspector will have to walk to the actual point where the stormwater leaves the project or enters a stream or wetland. Evidence that EPSC measures are potentially not adequately working adequately are the presence of sediment releases and objectionable color contrast.

3.4.5: Sediment Releases

An EPSC inspector needs to be looking for any evidence that sediment has made it past the project limits 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 outside of the project limits, or
- Releases that impact an aquatic feature, stream, wetlands etc.

CL 209.01-03 should be followed in the event a sediment release is discovered during the inspection. It's important to note that sediment releases into streams or wetlands cannot be removed without prior 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 5.5.3.5). Furthermore, the TDEC approved inspection form requires an inspector to verify whether 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 noticeably 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 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.
- Placed in the proper location within the drainage area. For example, a measure designed to handle sheet flow should not be 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 measures should be used to add additional storage capacity.
- Maintained correctly. All measures that have had their capacity reduced by 50% must be cleaned out to remain effective (CGP 5.5.3.1.(d)).
- Effectively preventing or minimizing erosion and controlling the mobilized sediment from leaving the site (CGP 5.5.3.1(a)).

3.4.8: Stabilization

Any disturbed area that is inactive (i.e., no active work occurring) and activity will not resume for a period longer than two weeks must be either temporarily or permanently stabilized (CGP 5.5.3.4.). Disturbed areas that have a gradient of 35% or greater must be stabilized within one week of activity ceasing (CGP 5.5.3.4.).

Please keep in mind that preconstruction vegetative ground cover cannot be disturbed more than 14 days before grading unless the area is temporarily or permanently stabilized (CGP 5.5.3.1.(f)).

Also, SS209.06 requires that seeding, sodding, matting, or other acceptable EPSC operations be performed within 48 hours of the occurrence of either:

- Each 25-foot vertical increment is graded
- Upon suspension or completion of grading operations in a specific area.

An inspector needs to verify that areas of disturbance are being stabilized within the appropriate timeframe.

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

All stream, wetland alteration, and on-site mitigations sites (i.e., water quality permitted locations) need to be inspected 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 waters with unavailable parameters must have a stream buffer with an average width of 60-feet with a minimum width of 30-feet (CGP 6.4.2).

Certain projects are exempt from the buffer requirement (CGP 4.1.2.1., 4.1.2.2., and 6.4.2.). All TDOT SWPPPs will indicate whether the buffer requirements apply to a particular project. Please refer to the project specific SWPPP to determine if buffers are required.

A 15-foot buffer is also required for any wet weather conveyance identified as waters of the U.S. by the U.S. Army Corps of Engineers or the Environmental Protection Agency (CGP Pg. 21 Note 6).

3.4.11: Past Recommendations

All recommendations, corrective actions or recurring corrective actions, made during the previous inspection need to be reviewed to verify their completion. If they have not been completed, then they will need to be included in the current inspection as recurring corrective actions.

3.4.12: Waste and Borrow Areas

Please refer to the department's Waste and Borrow Policy for instructions regarding how to address waste and borrow sites.

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 5.5.3.7(a)). 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 6.1. and 4.1.4). An EPSC inspector needs to look for signs of leaks or spills as they conduct their 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 the project limits, make sure that there is proper secondary containment around the tank to capture any rupture or leak. Be aware of collected rainfall in any secondary containment 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 secondary containment and possibly become polluted with any residual product from the tank.

If the project has 1320 gallons of fuel stored on the project or the capacity to store that amount of fuel, a project specific Spill Prevention, Control, and Countermeasure (SPCC) plan must be developed and submitted to the TDOT District Operations Supervisor as specified in SP107FP. This plan shall address fuel storage on the project site and how spills will be addressed.

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 reported immediately. The project SWPPP will provide guidance regarding how to report a spill. Any spill on a project site must be prevented from entering any stream or wetland.

3.4.16: Burning

TDEC's Division of Air Pollution Control 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 4.1.5.). 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 to minimize off-site tracking (CGP 5.5.3.1(j)). 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 5.5.3.1.(j)). 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 circumstances spelled out in CGP 5.4.1.:

- Whenever there is a change in the scope of the project that would be expected to have a significant effect on the discharge of pollutants to the waters of the state and which has not otherwise been addressed in the SWPPP.
- Whenever there is a change in chemical treatment methods, including the use of different treatment chemical, different dosage or application rate or different area of application.
- Whenever inspections or investigations by site operators or local, state, or federal officials indicate the SWPPP is proving ineffective in eliminating or significantly minimizing pollutants from sources identified under CGP 5.5.2 or is otherwise not achieving the general objectives of controlling pollutants in stormwater discharges associated with construction activity. A copy of any correspondence to that effect must be retained in the SWPPP.
- Whenever any new operator (typically a secondary permittee) who will implement a measure of the SWPPP must be identified (see CGP 3.1.1).
- Whenever it is necessary to include water quality protection measures as required by the applicable wildlife management agency intended to prevent a negative impact to legally protected state or federally listed fauna or flora (or species proposed for such protection – (CGP 1.3(h)).
- Whenever a Total Maximum Daily Load (TMDL) is developed for the receiving waters for a pollutant of concern (e.g., siltation).

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.

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 must be present at the inspection so all concerns surrounding a recommendation 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: future maintenance, corrective actions, and recurring corrective actions. The following describes each category and their intended use.

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

- **Future maintenance** are recommendations made to 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 a future maintenance recommendation would be the application of temporary mulch to an area that is getting close to being inactive for 14 days.
- **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 must 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 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.

Often an EPSC inspector may encounter a situation that does not require a recommendation but needs 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.

If the EPSC inspector encounters a situation where recurring corrective actions are not being addressed in the appropriate timeframe, they need to make appropriate project staff aware of the situation. The following escalation process must be implemented if this situation occurs:

- If a recurring corrective action appears on a EPSC inspection form for more than one week, the TDOT District Operations Supervisor must be notified and made aware of the situation to assist in resolving the situation.
- If a recurring corrective action appears on a EPSC inspection form for more than two weeks, the TDOT District Operations Engineer must be notified and made aware of the situation to assist in resolving the situation.
- If a recurring corrective action appears on a EPSC inspection form for more than three weeks, the TDOT Regional Engineer must be notified and made aware of the situation to assist in resolving the situation.

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 regulation? Some examples would be a sediment release, objectionable color contrast, no concrete washout area available, or inactive disturbed areas past two weeks. 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 backing that is undermined adjacent to a stream and has not yet released any sediment. In this case, the

recommendations must 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 inspector must understand what caused the issue to recommend the best solution. 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 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 event exceeded the design event.

Section 4 – Documenting the 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 5.5.3.11.(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 of TDEC's form can be found in Appendix C.

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION (TDEC)
DIVISION OF WATER RESOURCES (DWR)
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 ACTIVITES (CGP) CONSTRUCTION STORMWATER INSPECTION CERTIFICATION (INSPECTION FORM)

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/ground conditions:	Rainfall total since last inspection:	Inspector's TNEPSC Certification Number:
Site Assessment ☐Yes ☐ No	Assessor's TN PE registration number:	Assessor's TNEPSC Level II/CPESC number:

Site or Project Name: Insert the road name or number followed by the county. A limited amount of additional detail can be added 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: TDOT will utilize the Certification Expiration Date, provided on the Certificate of Completion from the TDOT Fundamentals of EPSC Training Class. This has been approved by TDEC.

Site Assessment: This will not be utilized and marked NA.

Assessor's TNPE Registration Number: This will not be utilized and marked NA.

Assessor's TNEPSC Leve II/CPESC Number: This will not be utilized and marked NA

Check the box if the following items are on-site:	
☐	Notice of Coverage (NOC)
☐	Stormwater Pollution Prevention Plan (SWPPP)
☐	Weekly inspection documentation
☐	Site contact information
☐	Rain Gage
Off-site Reference Rain Gage Location	

This area requires the inspector to indicate, by checking the appropriate item, whether the items listed are located on site. Simply check the box next to the items that are located and being maintained on site.

Please note that if the SWPPP and Weekly inspections (EPSC Inspections) are being kept and maintained off site, it is appropriate to leave box beside those items 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 per the current phase?		☐ Yes	☐ No
2.	Are EPSCs functioning correctly at all disturbed areas/material storage areas? (permit 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? (permit 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? (permit section 4.1.3) If "No," describe below the measure to be implemented to address deficiencies.	☐ N/A	☐ Yes	☐ No
6.	If construction activity at any location on-site has temporarily/permanently ceased, was the area stabilized within 14 days? (permit section 3.5.3.2) If "No," describe below each location and measures taken to stabilize the area(s).	☐ N/A	☐ Yes	☐ No
7.	Have pollution prevention measures been installed, implemented, and maintained to minimize the discharge of pollutants from wash waters, exposure of materials and discharges from spills and leaks per section 4.1.4? If "No," describe below the measure to be implemented to address deficiencies.	☐ N/A	☐ 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.	☐ N/A	☐ Yes	☐ No

Read each question carefully and answer accordingly.

Pay close attention to questions 5, 6, 7, 8, and 9. These questions have a "N/A" option to indicate it does not apply.

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

Comments Section: Insert the following text in this section, "See attached." All TDOT EPSC inspections 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 5.5.3.11 (g) and 8.7.2 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 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 35. 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 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 describe the recommendation being made.

Object. Color Contrast: Indicate by placing "Y" if an objectionable color contrast was observed. **Do not place "N" if this was not observed.**

Sed. Release: Indicate by placing "Y" if a sediment release was observed. **Do not place "N" if this was not 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.

Contractor's Signature: _____ Date: _____

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

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

It is highly recommended that photographs be included in the EPSC inspection process. The "photo log" is intended to 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 help explain 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: 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 Rainfall Data Log. The Rainfall Data Log must be kept with the SWPPP and EPSC inspection reports. Off-site reference locations should only be used for holidays, weekends, or when the project is near completion and waiting on vegetation.

The following information must be recorded on the Rainfall Data 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 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 most of the precipitation in the gauge fell during the previous workday and nighttime, the reading would be documented as the previous day's rainfall data.
For example, TDOT personnel read gauge #1 as 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 Rainfall Data Log that has been completed for a partial month. A blank copy of the Rainfall Data 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									

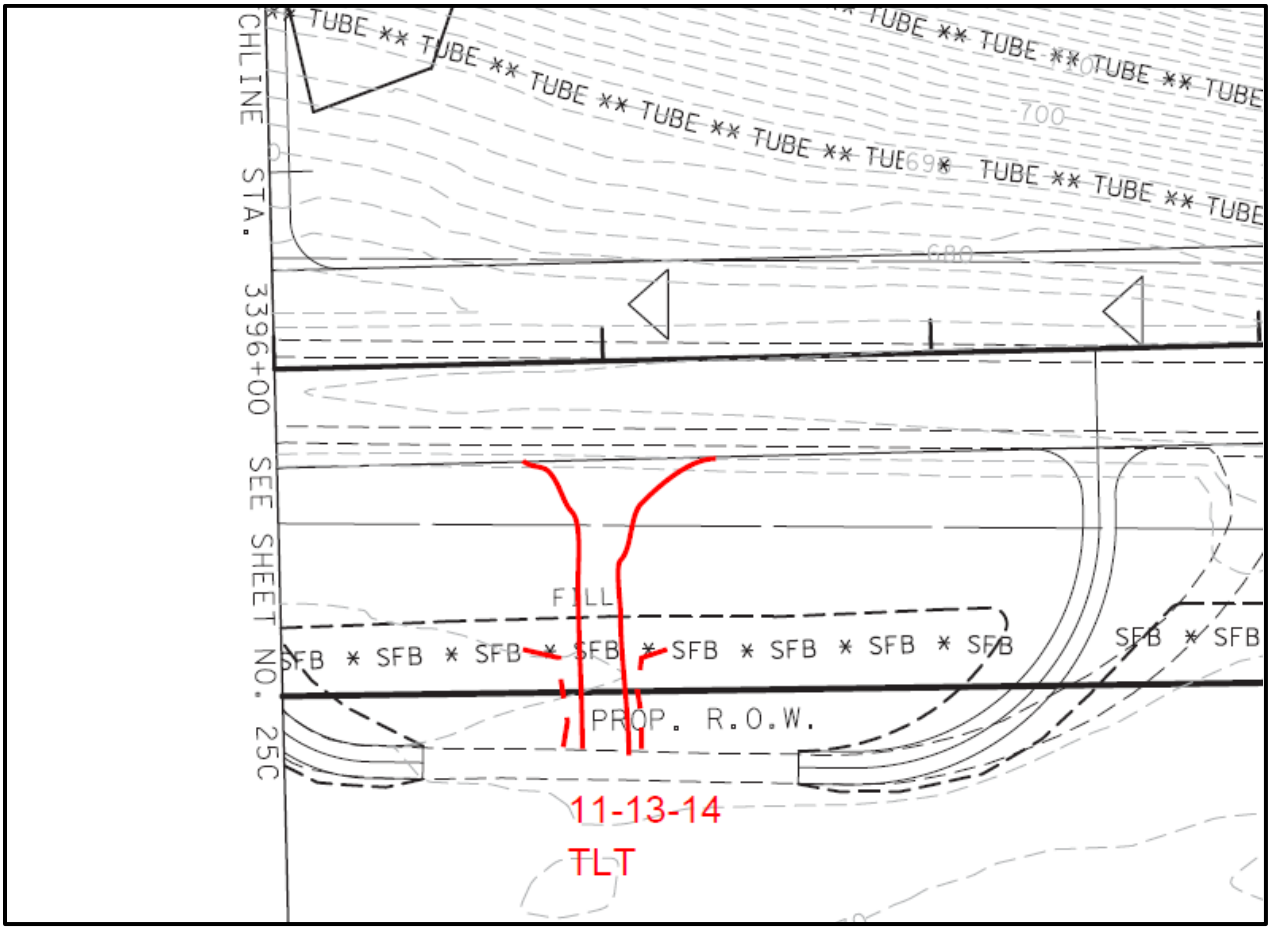
[1] Day of Week= Su,M,Tu,W,Th,F,Sa
[2] Predicted Precipitation Source: NOAA
[3] Reference site source: TVA – Tims Ford Dam
R = Gauge Removed

Rainfall Data 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 or the construction 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 must 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 to post the documents in the correct location and format.

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

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.

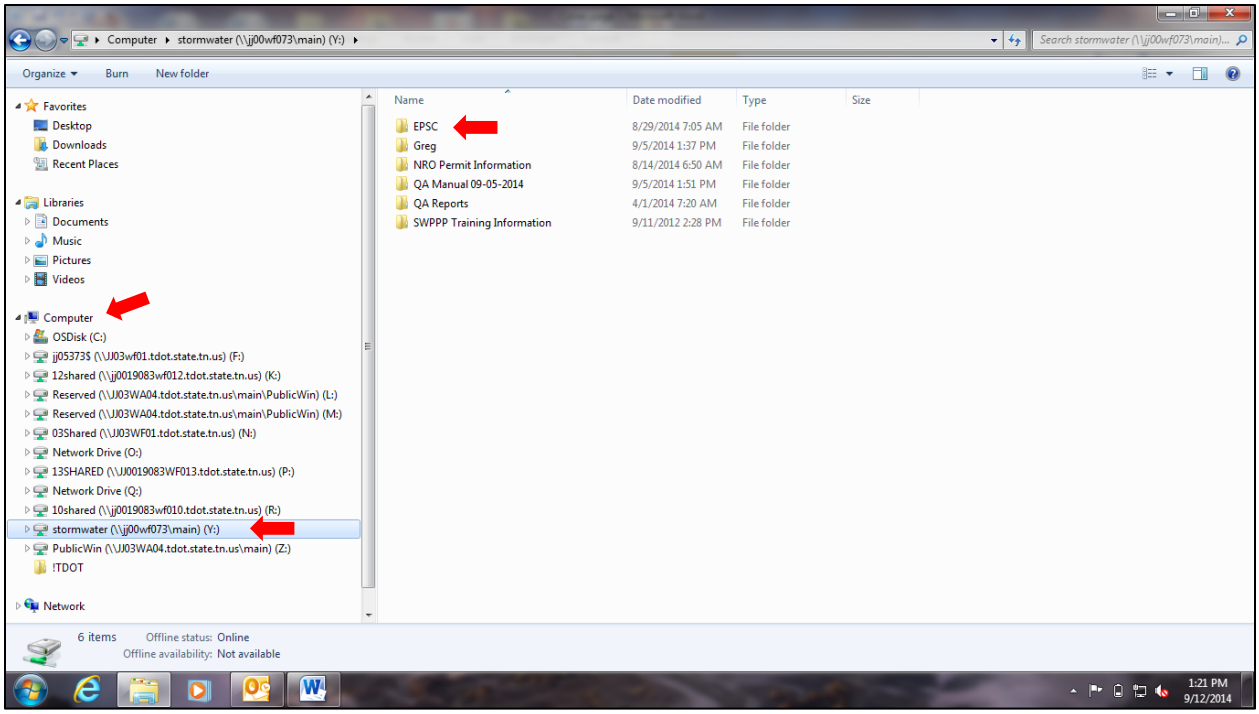
5.1: Posting to the Stormwater Drive

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 "Ag03sdcwf00010\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.

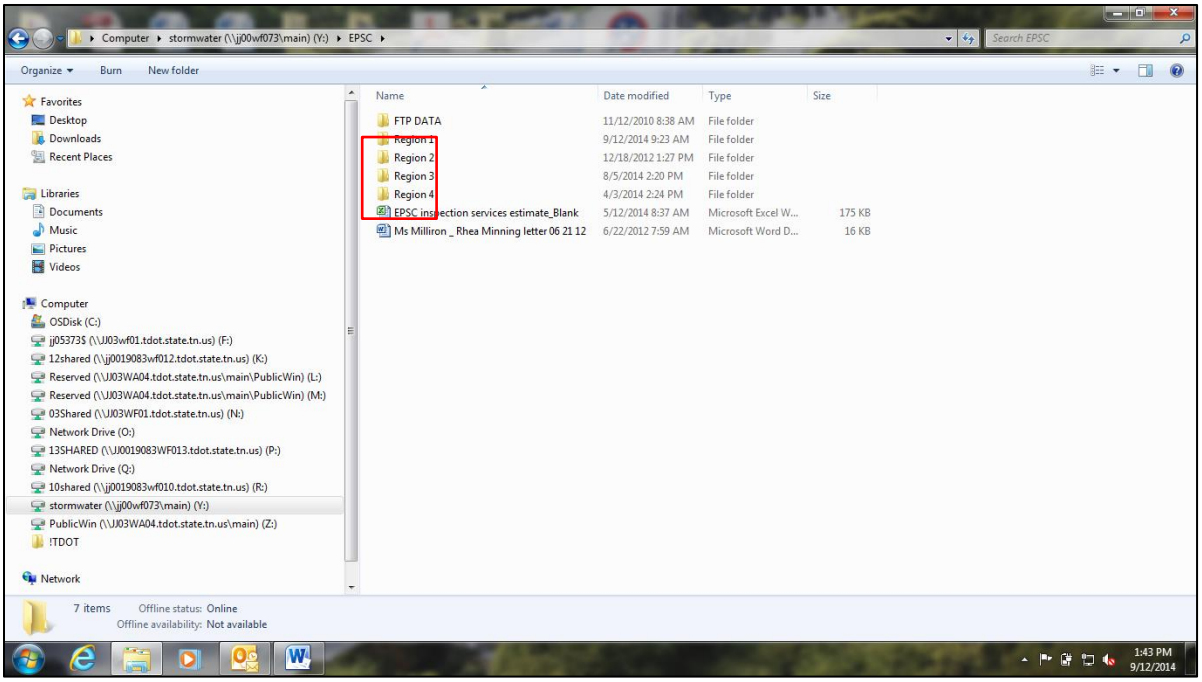
Consultants will have to access the drive via a VPN account.

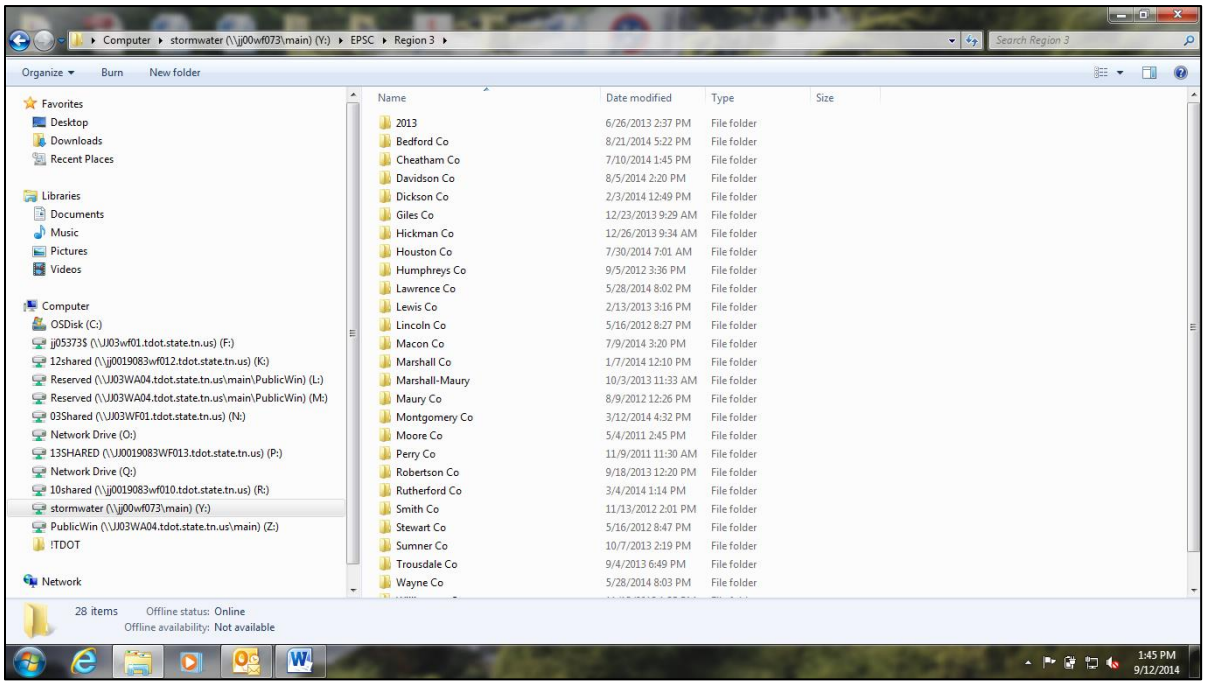


Locating the Correct Folder:

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 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 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 inspection frequency can be reduced to a minimum of 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 inspection frequency can be reduced to monthly, specifying areas at final stabilization with a description (i.e., Sta. 3+150 to Sta. 5+180 slopes have permanent cover, roadways have been paved, and there is to be no additional disturbance). The letter should also include the Project Name, Project Description, County, TDOT PIN, and NPDES tracking number, TDOT Construction number, TDOT Contract number, and Contractor. Photographs of the stabilized areas should be included with the letter.
- The District Operations Supervisor will review the letter and subsequently forward the request to TDEC's Central Office in Nashville.
- Mark the areas in questions on the project SWPPP.
- Note on the SWPPP that inspections have been reduced to monthly and the date on which the reduction took place.

Once the request for reduction in 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 inspection frequency must return to twice weekly. Inspections must continue on the project site until the NOT is submitted to the TDEC.

Section 7 – Closing out the Project

7.1: When can a project be terminated?

According to the CGP 9.1.1, a permittee may terminate coverage under the CGP if the project meets the following conditions.

- For areas the primary permittee has control, all earth-disturbing activities and, if applicable, construction support activities permitted under Section 1.2.2 at the site are complete and the following requirements are met:
  - For any areas that were disturbed during construction, are not covered by permanent structures and over which the permittee had control during the construction activities; the requirements for final vegetation or non-vegetative stabilization described in Subsection 5.5.3.4. are met.
  - The permittee has removed and properly disposed of all construction materials as well as waste and waste handling devices. The permittee has removed all equipment and vehicles that were used during construction, unless they are intended for long-term use following termination of permit coverage.
  - The permittee has removed all stormwater controls that were installed and maintained during construction, except those that are intended for long-term use following termination of permit coverage.
  - The permittee has identified in the SWPPP who is responsible for ongoing maintenance of any stormwater controls left on the site for long-term use following termination of permit coverage.
  - The groundcover achieves permanent stabilization.
- The permittee has transferred control of all areas of the site for which he is responsible (including, but not limited to, infrastructure, common areas, stormwater drainage structures, sediment control basin) under this permit to another operator, and that operator has submitted an NOI and obtained coverage under this permit.
- The permittee obtains coverage under an individual or alternative general NPDES permit.

7.2: What is permanent stabilization?

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

- A perennial, preferably native, vegetative cover with a uniform (i.e., evenly distributed, without large bare areas) density of at least 70 percent 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.

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

7.3: Who makes the call on permanent 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, permanent stabilization has been achieved, the Quality Assurance (QA) inspector is notified and performs an inspection of the project. If the QA inspector concurs with the EPSC inspector, that permanent stabilization has been achieved, the QA inspector will include a statement of concurrence in the final QA report.

7.4: Submitting the NOT

Submittal of the NOT for a site, is the final step in the EPSC inspection process. The NOT notifies TDEC that all construction is complete, and the site has reached final stabilization. It also closes out the active NOC in TDOT's name. Once the EPSC inspector has determined that the project has reached final stabilization and the QA inspector has concurred, 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, at the required frequency, until the NOT is accepted.

Please keep in mind that the "Waste and Borrow Policy" 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. 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 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.).

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

Rainfall Data Log Form

TN TDOT Department of Transportation

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 (DWR)
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 ACTIVITES (CGP) CONSTRUCTION STORMWATER INSPECTION CERTIFICATION (INSPECTION FORM)

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/ground conditions:	Rainfall total since last inspection:	Inspector's TNEPSC Certification Number:
Site Assessment ☐ Yes ☐ No	Assessor's TN PE registration number:	Assessor's TNEPSC Level II/CPESC number:

Check the box if the following items are on-site:	
☐	Notice of Coverage (NOC)
☐	Stormwater Pollution Prevention Plan (SWPPP)
☐	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 per the current phase?		☐ Yes	☐ No
2.	Are EPSCs functioning correctly at all disturbed areas/material storage areas? (permit 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? (permit 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? (permit section 4.1.3) If "No," describe below the measure to be implemented to address deficiencies.	☐ N/A	☐ Yes	☐ No
6.	If construction activity at any location on-site has temporarily/permanently ceased, was the area stabilized within 14 days? (permit section 3.5.3.2) If "No," describe below each location and measures taken to stabilize the area(s).	☐ N/A	☐ Yes	☐ No
7.	Have pollution prevention measures been installed, implemented, and maintained to minimize the discharge of pollutants from wash waters, exposure of materials and discharges from spills and leaks per section 4.1.4? If "No," describe below the measure to be implemented to address deficiencies.	☐ N/A	☐ Yes	☐ No

Site or Project Name:	**NPDES Tracking Number: TNR**
Primary Permittee Name:	Date of Inspection:

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.	☐ N/A	☐ Yes	☐ No

Comment Section. If the answer is "No" for any of the above, describe the problem and summarize 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 5.5.3.11 (g) and 8.7.2 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:

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# _____

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

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.

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)

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 (DWR)
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. Submit this form to the local DWR Environmental Field Office (EFO) address (see table below) or using MyTDEC Forms electronic submittal process. For more information, contact your local EFO at the toll-free number 1-888-891-8332 (TDEC).

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: (check only one)

☐	Primary permittee termination: all requirements for termination under Permit Part 9.1.1. a) through c) have been met. This includes, but is not limited to, for areas the primary permittee has control all earth-disturbing activities at the site are complete and permanent stabilization as defined in Part 10 of the CGP has been achieved. (attach photo documentation).
	When applicable, and you are a primary permittee seeking termination, list who is responsible for ongoing maintenance of stormwater controls left on the site subject for long-term use following termination of coverage:
☐	Secondary permittee termination: all requirements for termination under Permit Part 9.2.1. have been met (no longer an operator at the construction site).

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