Construction Site BMPs
CGP and MRP Requirements

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Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP)
EOA, Inc.

January 20, 2026

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Outline

- MRP Construction Site Control Program Requirements
- Best Management Practices
- Resources

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Common Acronyms

- BMPs = Best Management Practices
- CGP = Statewide Stormwater Construction General Permit
- ERP = Enforcement Response Plan
- MRP = Municipal Regional Stormwater Permit
- MS4 = Municipal Separate Storm Sewer System
- NOI = Notice of Intent
- NPDES = National Pollutant Discharge Elimination System
- QSD = Qualified SWPPP Developer
- QSP = Qualified SWPPP Practitioner
- SCVURPPP = Santa Clara Valley Urban Runoff Pollution Prevention Program
- SWPPPs = Stormwater Pollution Prevention Plans

Municipal Regional Permit

- San Francisco Bay Municipal Regional Stormwater Permit (MRP)
- Covers 79 cities, counties, and districts in Bay Area
- SCVURPPP assists County, Valley Water and 13 cities/towns in Santa Clara County with compliance
  - SCVURPPP Construction Ad Hoc Task Group (AHTG)

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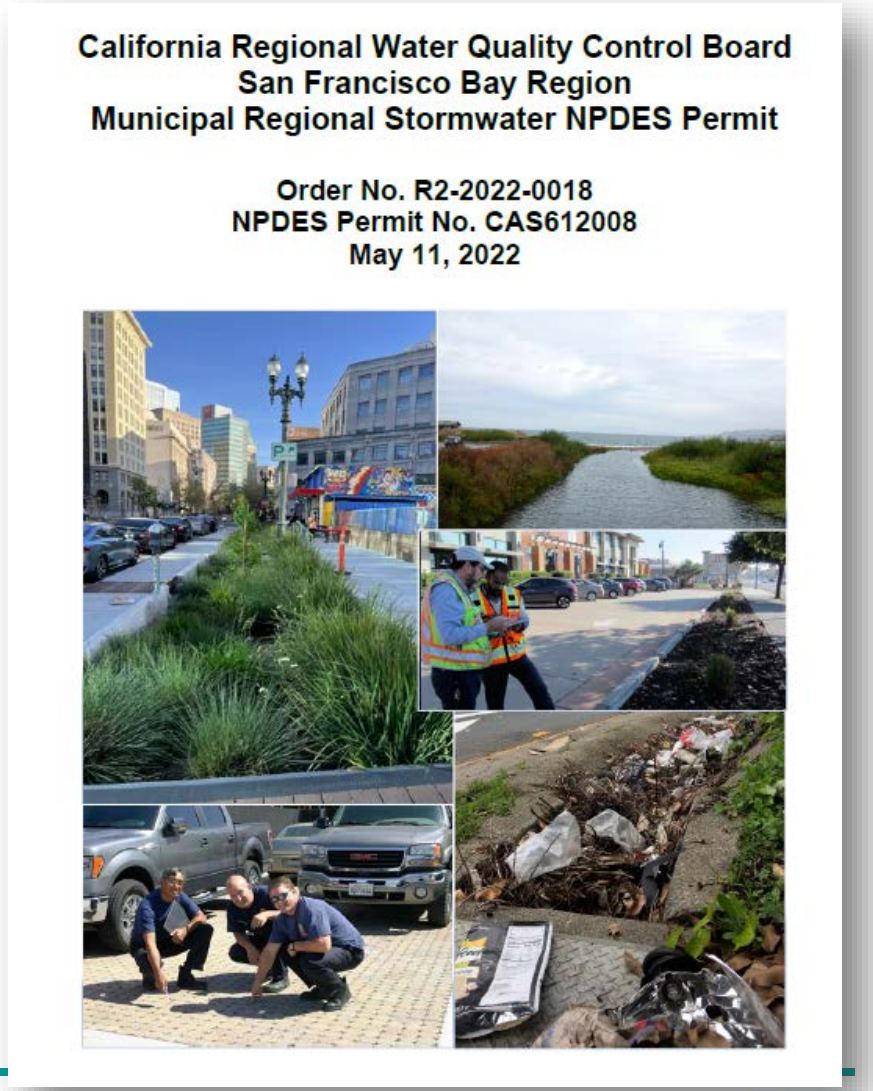
Municipal Regional Permit

- First adopted October 14, 2009
- Permit renewed every 5 years
- MRP 2.0 Effective January 1, 2016
- MRP 3.0 Effective July 1, 2022



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MRP Applicable Provisions

Topic Specific		Pollutant Specific		Monitoring/Reporting	
C.2 Municipal Operations	C.6 Construction Site Controls	C.9 Pesticides Toxicity Control	C.13 Copper Controls	C.8 Water Quality Monitoring	C.20 Cost Reporting
C.3 New Development and Redevelopment	C.7 Public Information and Outreach	C.10 Trash Load Reduction	C.14 Bacteria Controls	C.21 Asset Management	
C.4 Industrial/ Commercial Site Controls	C.15 Exempted and Conditionally Exempted Discharges	C.11/12 PCB and Mercury Controls			
C.5 Illicit Discharge Controls	C.17 Unsheltered Homeless Populations				

Construction Site Control Program (MRP Provision C.6)

- Prevent discharges of pollutants and impacts on receiving waters
- Require appropriate BMPs in 6 categories
  - at **ALL** construction sites **ALL** year long

Construction Site Control Program

- Legal authority
  - Site Inspection
  - Require BMPs
    - –Site specific
    - –Seasonally appropriate
    - –Phase appropriate
  - Issue Enforcement Actions

Legal authority is in Municipal Code/ Stormwater Ordinance

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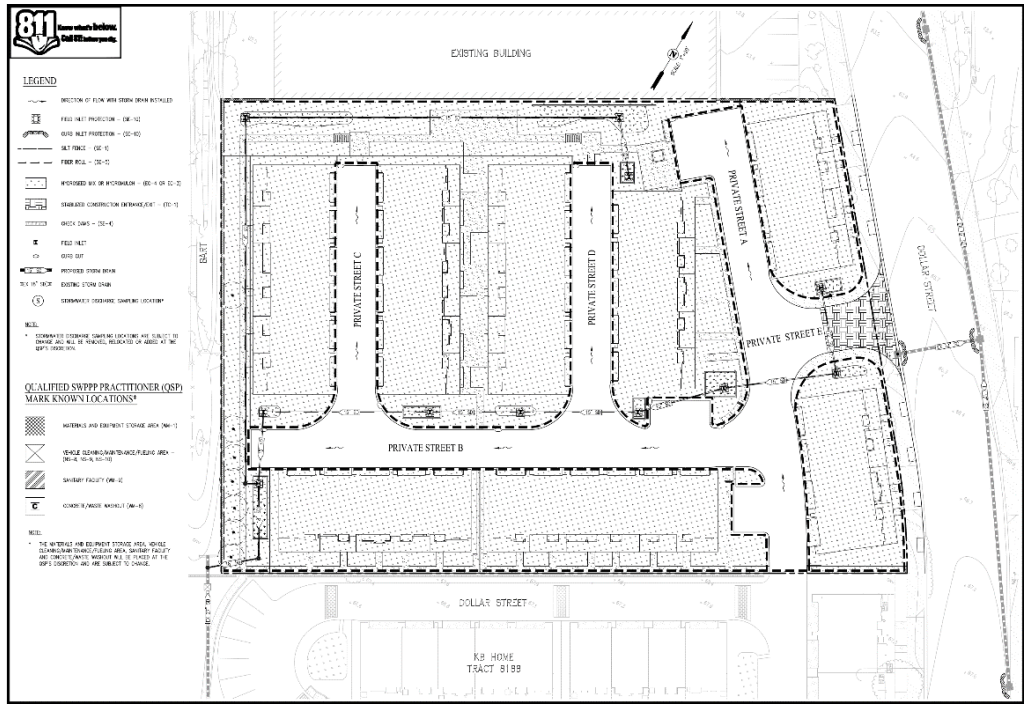
Construction Site Control Program

- Plan approval process
  - Review erosion/sediment control plans or SWPPPs
    - SWPPPs must include erosion/sediment control plans and drawings
  - Verify sites ≥ 1 acre have filed a NOI for coverage under CGP
  - Provide outreach as appropriate



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Minimum Inspection Requirements

- Pre-wet season notification/letter by September 1st
- Monthly inspections during wet season
  - October 1st – April 30th

Minimum Inspection Requirements

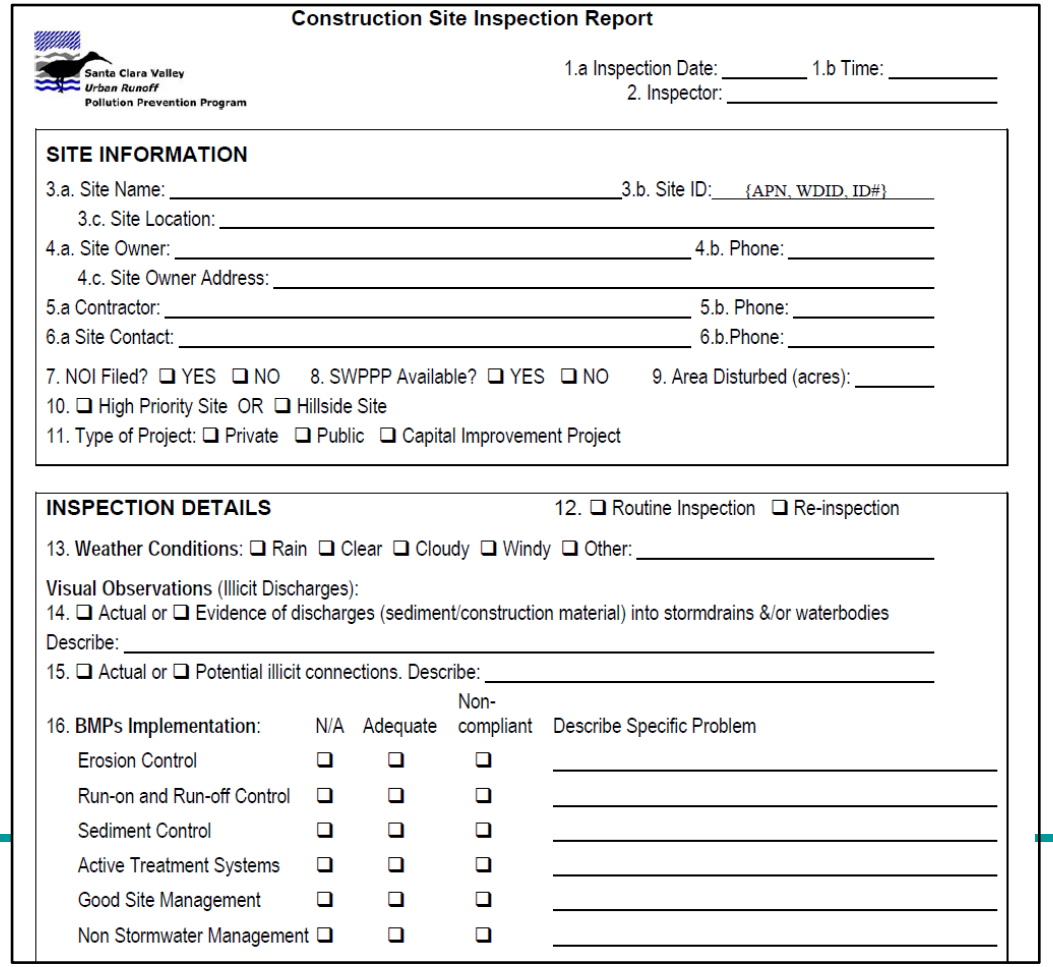
- Public & Private Sites
  - Disturbing ≥ 1 acre
  - Hillside projects disturbing ≥5,000 sq ft
    - Defined in 2016 Annual Report
    - Default criteria average slope ≥15%
  - High Priority sites identified by Permittee
    - Example criteria: proximity to creek, sensitivity of creek, erosion potential, compliance history, etc.

Inspection Content

- Assessment of compliance with ordinance, municipal permits & implementation/maintenance of erosion/sediment control plan or SWPPP
- Assessment of adequacy & effectiveness of site-specific BMPs
- Visual observations
  - Actual discharges or evidence of sediment and/or construction-related materials into storm drains/waterbodies
  - Illicit connections or potential illicit connections
- Education, as needed

Inspection Recordkeeping and Reporting

- Complete inspection form for every required inspection



Construction Site Inspection Report

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1.a Inspection Date: _____ 1.b Time: _____
2. Inspector: _____

SITE INFORMATION

3.a. Site Name: _____ 3.b. Site ID: {APN, WDID, ID#}
3.c. Site Location: _____
4.a. Site Owner: _____ 4.b. Phone: _____
4.c. Site Owner Address: _____
5.a Contractor: _____ 5.b. Phone: _____
6.a Site Contact: _____ 6.b.Phone: _____

7. NOI Filed? ❑ YES ❑ NO 8. SWPPP Available? ❑ YES ❑ NO 9. Area Disturbed (acres): _____
10. ❑ High Priority Site OR ❑ Hillside Site
11. Type of Project: ❑ Private ❑ Public ❑ Capital Improvement Project

INSPECTION DETAILS 12. ❑ Routine Inspection ❑ Re-inspection

13. **Weather Conditions**: ❑ Rain ❑ Clear ❑ Cloudy ❑ Windy ❑ Other: _____

Visual Observations (Illicit Discharges):
14. ❑ Actual or ❑ Evidence of discharges (sediment/construction material) into stormdrains &/or waterbodies
Describe: _____
15. ❑ Actual or ❑ Potential illicit connections. Describe: _____

16. **BMPs Implementation**:	N/A	Adequate	Non-compliant	Describe Specific Problem
Erosion Control	❑	❑	❑	
Run-on and Run-off Control	❑	❑	❑	
Sediment Control	❑	❑	❑	
Active Treatment Systems	❑	❑	❑	
Good Site Management	❑	❑	❑	
Non Stormwater Management	❑	❑	❑	

Inspection Recordkeeping and Reporting

- Complete inspection form for every required inspection
- Track inspection data in database/spreadsheet
  - Specific data required by MRP
  - C.12.g demolition inspections and manifests

Site Name	Inspection Date	Inspector	Weather During Inspection	Enforcement	Problems Observed						
					Erosion Control	Run-on & Runoff	Sediment Control	Active Treatment	Good Site Management	Non-Stormwater Management	Illicit Discharge
Panoramic Views	9/30/2015	Kristin Kerr	Clear	Written Warning			x				
Panoramic Views	10/15/2015	Jill Bicknell	Clear	No Action							
Panoramic Views	11/15/2015	Jill Bicknell	Rain	Stop Work Order	x		x				x
Panoramic Views	11/15/2015	Jill Bicknell	Rain	No Action							

Enforcement Response Plan

- Guidance for inspectors to take consistent actions to bring sites into compliance
- Identify enforcement tools
- Identify roles and responsibilities
- Enforcement procedures
- Appropriate time periods for corrective actions

Each Permittee has agency specific ERP

Enforcement Response Plan

- Corrective Actions
  - Active discharge – cease immediately
  - Corrective actions w/in 10 business days or before next rain event
    - –If allow longer document rationale, including expected time frame for compliance

Source Control: PCBs (Provision C.12.g)

- Manage PCB-Containing Materials and Wastes During Building Demolition Activities
  - Inspect applicable demo sites to ensure effective BMPs
  - Enhance construction site control program to minimize migration of PCBs from demolition activities

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Source Control: Copper (Provision C.13.a)

- Runoff from architectural copper can impact water quality and aquatic life
  - Concerns during installation, treatment and washing
- When issuing building permits require BMPs

- Look for BMPs during construction inspections
- Annually report permitting and enforcement

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Requirements for Copper Roofs and Other Architectural Copper

Protect water quality during installation, cleaning, treating, and washing!

Copper from Buildings May Harm Aquatic Life

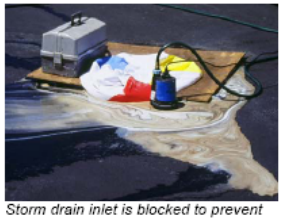
Copper can harm aquatic life in San Francisco Bay. Water that comes into contact with architectural copper may contribute to impacts, especially during installation, cleaning, treating, or washing. Patination solutions that are used to obtain the desired shade of green or brown typically contain acids. After treatment, when the copper is rinsed to remove these acids, the rinse water is a source of pollutants. Municipalities prohibit discharges to the storm drain of water used in the installation, cleaning, treating or washing of architectural copper.

Use Best Management Practices (BMPs)

The following Best Management Practices (BMPs) must be implemented to prevent prohibited discharges to storm drains.

During Installation

- If possible, purchase copper materials that have been pre-patinated at the factory.
- If patination is done on-site, implement one or more of the following BMPs:
  - Discharge the rinse water to landscaping. Ensure that the rinse water does not flow to the street or storm drain. Block off storm drain inlet if needed.
  - Collect rinse water in a tank and pump to the sanitary sewer. Contact your local sanitary sewer agency before discharging to the sanitary sewer.
  - Collect the rinse water in a tank and haul off-site for proper disposal.
- Consider coating the copper materials with an impervious coating that prevents further corrosion and runoff. This will also maintain the desired color for a longer time, requiring less maintenance.



Storm drain inlet is blocked to prevent prohibited discharge. The water must be pumped and disposed of properly.

During Maintenance

Implement the following BMPs during routine maintenance activities, such as power washing the roof, re-patination or re-application of impervious coating:

- Block storm drain inlets as needed to prevent runoff from entering storm drains.
- Discharge the wash water to landscaping or to the sanitary sewer (with permission from the local sanitary sewer agency). If this is not an option, haul the wash water off-site for proper disposal.

Protect the Bay and yourself!

If you are responsible for a discharge to the storm drain of non-stormwater generated by installing, cleaning, treating or washing copper architectural features, you are in violation of the municipal stormwater ordinance and may be subject to a fine.

Contact Information

Santa Clara Valley Urban Runoff Pollution Prevention Program, www.scvurppp.org, **1-800-794-2482**

Construction General Permit

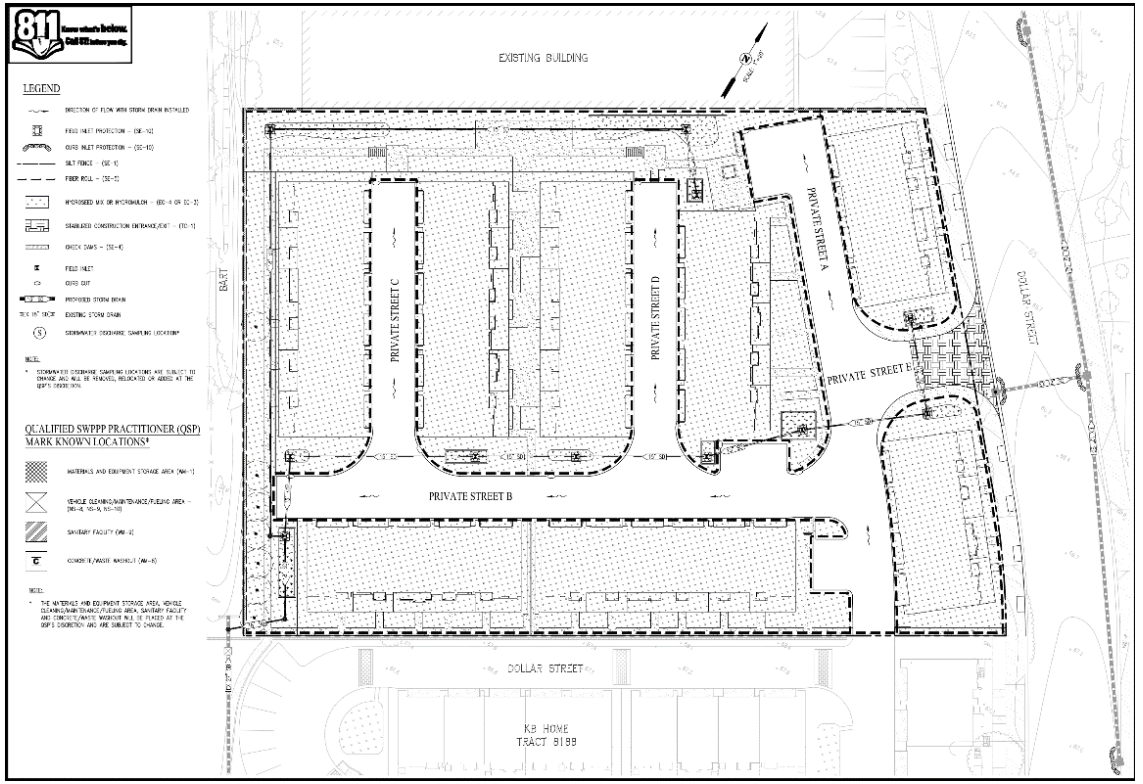
- Applies to projects that disturb ≥1 acre
- CGP update effective 9/1/23
  - Projects permitted under 2009 CGP had until 9/1/25
  - Stormwater Pollution Prevention Plan (SWPPP)
  - Best Management Practices (BMPs)
  - Conduct inspections
  - Conduct sampling
  - Report in SMARTs
  - QSP/QSD certification

Construction General Permit

- MRP requirements
  - Verify owners of construction sites that disturb ≥ 1 acre file NOI
  - Inspect sites that disturb ≥ 1 acre each month during wet season

Construction General Permit

- Tips for Municipalities
  - Reviewing SWPPP, talking with QSP, etc. will help inform your MRP inspection
  - Overall site compliance reflects on your inspection program



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BEST MANAGEMENT PRACTICES (BMPs)

Best Management Practices

- Prevent pollutants from leaving the site via stormwater
  - **SEDIMENT**
  - Concrete washout
  - Paint
  - Oil and grease
  - Litter
  - Waste
  - Construction materials
- By preventing
  - Contact with stormwater runoff
  - Mobilization of pollutants
  - Illicit discharge

Source: Michigan DEQ

Inspector's Role with Best Management Practices

- Inspectors don't select specific BMPs for contractors to use
  - identify type/category needed, e.g. erosion control
- Know appropriate use of BMPs
- Recognize proper BMP installation
- Observe if maintenance needed
- Note if additional controls needed
- Ask questions

Best Management Practices

- Six BMP categories
  - Run-on and Run-off Control
  - Good Site Management
  - Non-Stormwater Management
  - Active Treatment Systems (ATS)
  - Erosion Control Sediment Control – field sessions

Run-on and Runoff BMPs

- Run-on Controls
  - Keep water from off-site, upstream property from flowing through construction site
    - May bring off-site pollutants
    - May increase stormwater runoff flows
      - causing erosion or
      - overwhelming BMPs
- Runoff Controls
  - Manage stormwater flow to prevent erosion or flooding at downstream location

Good Site Management

- a.k.a. Good housekeeping
- Materials that have potential to be pollutants in stormwater
  - Material storage/use
  - Waste storage
  - Stockpiles
  - Porta potties
  - Waste disposal

Good Site Management

Keep stormwater from coming into contact with materials that can mobilize

- Keep materials from being exposed
- Keep materials from leaking
- Keep potential discharges from leaving the site (e.g., placement)

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Good Site Management

- Check for:
  - Covered and contained stockpiles
  - Covered and elevated material storage
  - Covered and contained waste storage
  - Placement of portable toilets (or 2° containment).

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Good Site Management

- Stockpiles
  - Cover when not being used
  - Protect all year long
  - Placement (e.g. not in gutter)
  - Berm around stockpile or upstream side

Non-Stormwater Management

- Activities that have potential to discharge
  - Potable water use
  - Paving/grinding operations
  - Vehicle/equipment use, cleaning, fueling and maintenance
  - Concrete work

Non-Stormwater Management

- Fuel, repair and wash equipment/vehicles off site
- Place drip pans, tarp, or containers under leaky vehicles/equipment
- Fix leaks promptly

Non-Stormwater Management

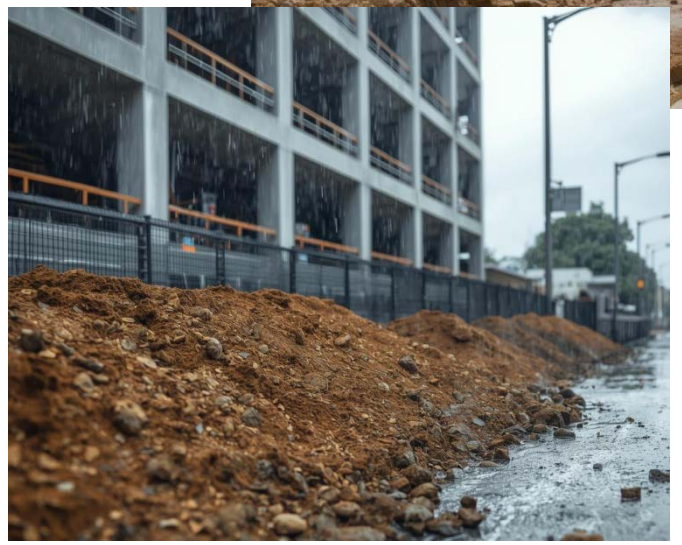
- Concrete Washout
  - Large enough for volume expected
  - Lined – prevent contact with or leaching into soils
  - Dispose of hardened concrete

Active Treatment Systems

- Adds chemicals for coagulation, flocculation and/or filtration
- Not common (expensive)
- CGP requires
  - ATS Plan: O&M manual, monitoring, sampling, spill prevention plan,
  - Designated operator and training
  - Data recording system
  - Numeric effluent limits for discharge

Erosion & Sediment Control

- Erosion control
  - First line of defense
  - Prevent soil movement by wind and water
- Sediment control
  - Second line of defense
  - Remove soil before it leaves the site
- Temporary or Permanent Controls
  - Verify temporary BMPs removed at completion



Erosion Control BMPs

- Most effective BMP – **Vegetation**
  - Shields soil from impact of wind & water
  - Increases permeability/infiltration
  - Slows run-off to non-erosive velocities
  - Filters sediment out of run-off
- Preserve existing vegetation
- Seed & mulch as soon as possible (final cover)

Erosion Control BMPs

- Temporary protection of exposed soil
  - Mats
  - Sprays (straw, bonded fiber matrix)
  - Compost blankets

Erosion Control BMPs

- Slope Interruption – slow flow to non-erosive velocity
  - Fiber rolls, compost socks, compost berms
  - Along contours of hillside
  - Spacing depends on slope
  - Overlap rolls/socks
  - Turn ends of roll/sock up slope (i.e., height of roll to capture runoff)

Erosion Control BMPs

- Sites should consider
  - Equipment needed
  - Product flexibility (condition of slope)
  - Used to establish vegetation
  - Installation timing (e.g., sprays need time to dry before rain)
  - Length of time
  - Irrigation availability
  - End use of site – building or vegetation

Sediment Control

- Trap sediment before it leaves the site
  - Intercept flow
  - Perimeter controls
    - site perimeter
    - storm drains
  - Filter sediment out of flow
  - Slow flow to allow sediment to settle out

Silt Fence BMP

- Perimeter control
- Sheet flow
  - Not for concentrated flow
- Continuous contact with ground
  - No daylight underneath – trenched in
- Ends overlap
- Remove accumulated sediment
- Stake positioned opposite of flow

Construction Site Exit

- Exit Stabilization – look for
  - Sediment in exit control
    - –e.g., gravel, rumble plates, FODs
  - Signs of other exits
  - Track out in streets
  - Adequate length/width
    - –see CASQA fact sheet TC-1 for design details

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Construction Site Exit

- Rumble plates orientation

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Construction Site Exit

- Additional BMPs may be needed
  - Street sweeping
  - Wheel wash

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Check Dams

- Correctly installed check dams should:
  - Filter sediment out of flow and/or trap flow to allow sediment to settle out
  - Use gravel bags, fiber rolls, foam rolls or compost socks
  - Designed for location and expected flow

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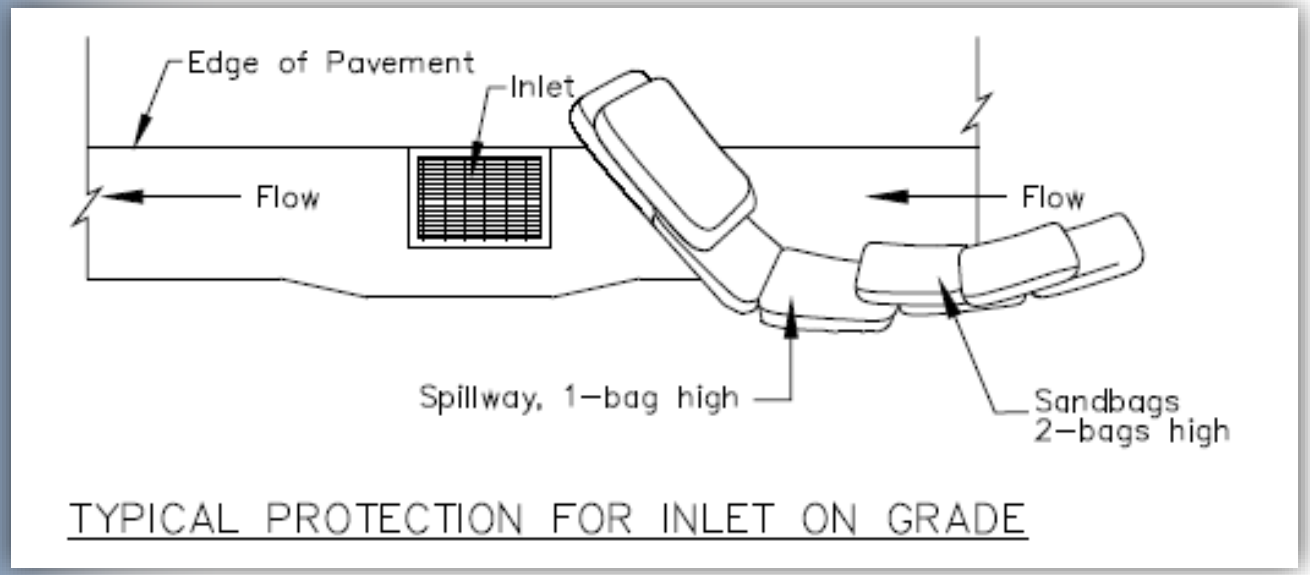
Inlet Protection

- Inlet protection should not:
  - cause flooding (where does overflow go?)
  - cause sediment discharge (i.e. broken sand bags/gravel bags)
- Inlet protection should be:
  - maintained regularly
  - removed at end of job
- Inlet protection may be off site

Inlet Protection

- Located around inlet based on direction of flow



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Inlet Protection

- Filter mats
  - Advantage in high traffic areas because low profile (i.e., can be driven over)
- Filter bags
  - Advantage in high traffic areas because below grade
  - Often forgotten and not maintained because not highly visible
- Gravel bags

Inlet Protection

- Fiber rolls
  - Don’t use monofilament wattles
    - dangerous to wildlife
  - Need consistent contact with ground
    - trench in
  - Not recommended for impervious surface
    - can’t trench in - often see weighed down with gravel bags

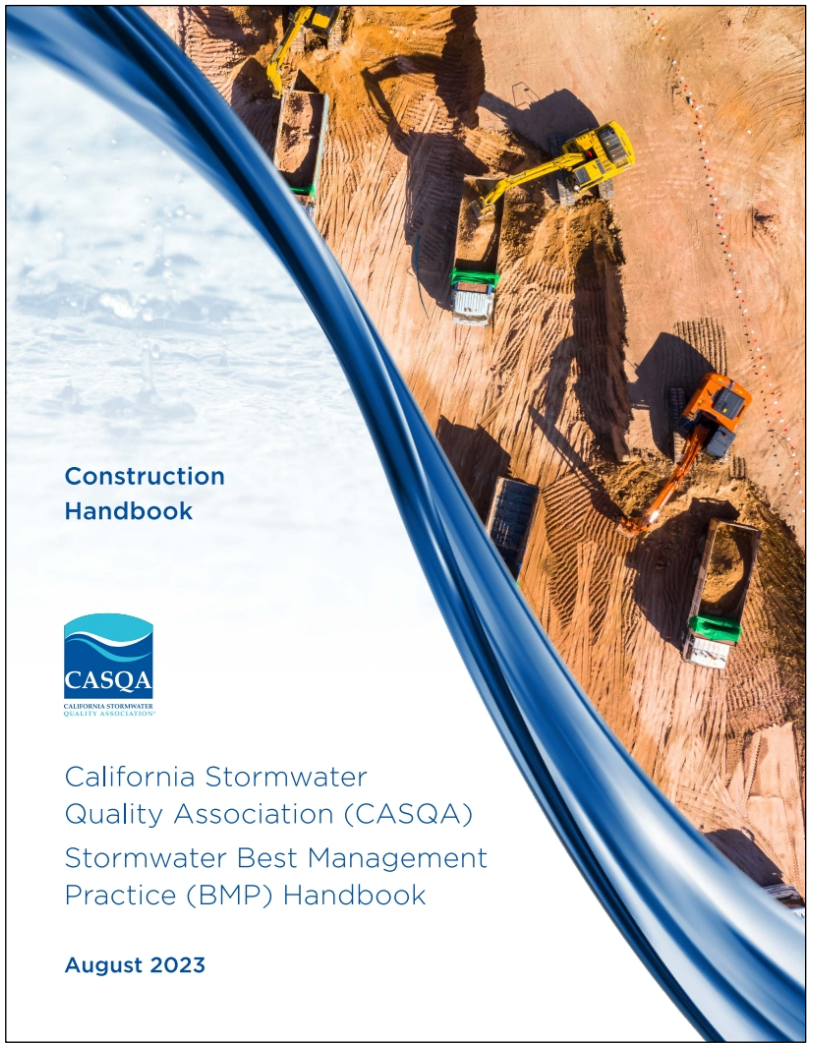
Inlet Protection

- Compost socks
  - Filters and holds back runoff effectively – even on pavement and gravel surfaces
  - Heavier - especially when wet - creating a better seal with pavement

RESOURCES

CASQA Online Handbook

- CASQA Construction BMP Handbook Portal – www.casqa.org
  - SCVURPPP group subscription: contact your agency's SW coordinator for information on how to access
  - BMP Fact Sheets in English and Spanish

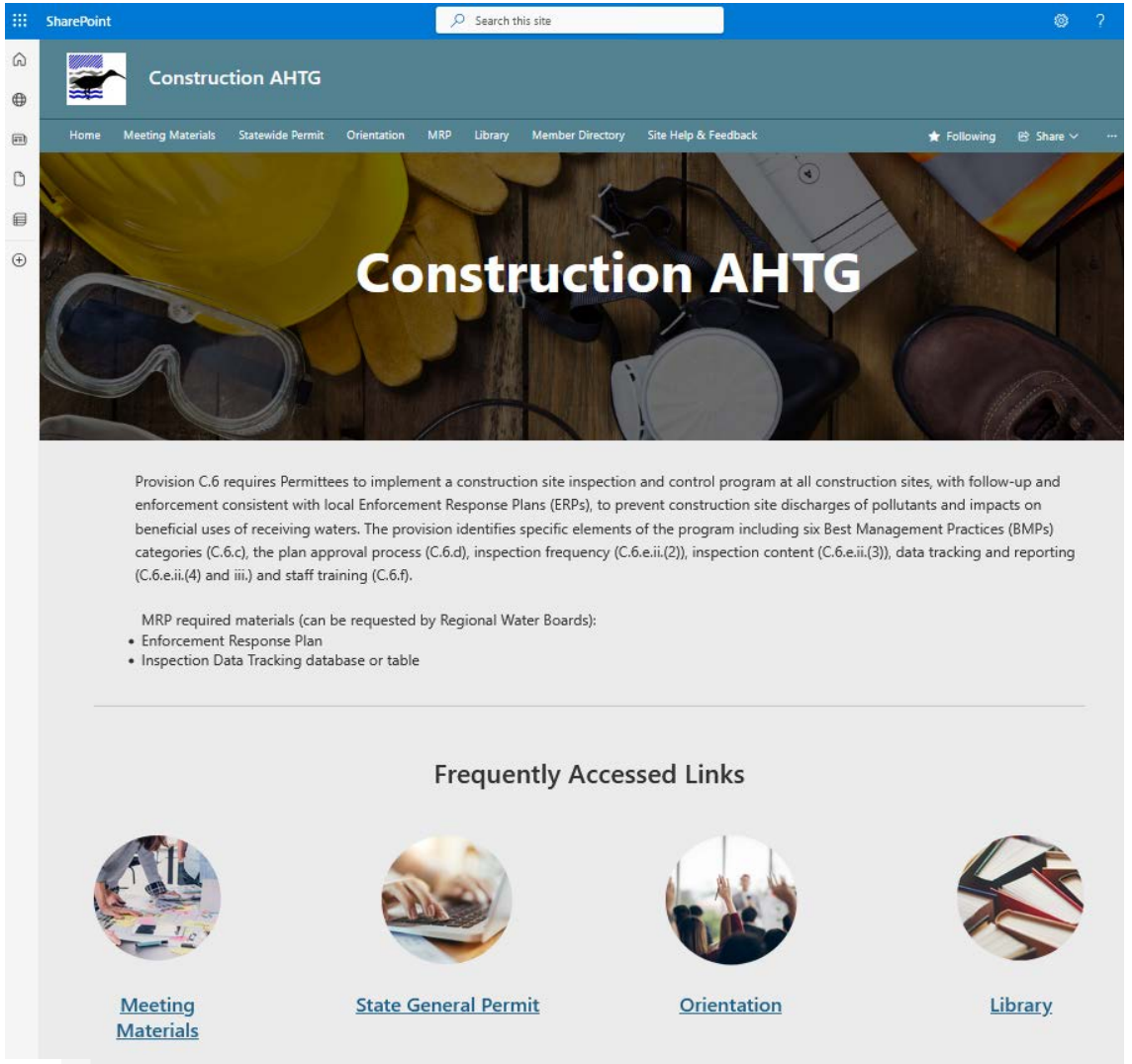


Resources

- SCVURPPP Website – www.scvurppp.org
  - BMP Plan Sheet
  - BMP Fact Sheets
    - updating to new SCVURPPP fact sheet format
- SCVURPPP Members Only Webpage
  - *Changes to the PCBs in Demo Program* (June 2023) recorded presentation
  - *Construction Site Stormwater Inspections – Regulatory Basics* (2020) recorded presentation

Resources

- NEW! SCVURPPP SharePoint Pages
  - AHTG emailed invitation to join



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