

Construction Inspection Program

The City of Lake Worth, Public Works Department has two Environmental Inspectors in the construction inspections department. Their goal is to obtain compliance from construction sites that are regulated by the Environmental Protection Agency (EPA). This program is a required element of the City's Nation Pollutant Discharge Elimination System (NPDES) permit to discharge storm water from the Municipal Separate Storm Sewer System (MS4).

Inspectors receive information on new construction sites from the City's Building Department. A two part inspection shall be conducted once the inspector meets with the site Superintendent. The inspector shall examine the site's Notice of Intent (NOI) that has been filed with the Environmental Protection Agency (EPA), and then conduct a through inspection of the site's Storm Water Pollution Prevention Plan (SWPPP). A SWPPP must be written prior to the submission of the NOI, and must be implemented prior to the commencement of construction activities. The inspector will check the SWPPP for all required elements, paying strict attention to the required certifications, inspection reports, and site description erosion and sediment controls.

The SWPPP shall be available on site in the construction office if applicable, or available locally when an on site construction office is absent. At least one SWPPP must be developed for each construction site. For more effective coordination of management practices and opportunities for cost sharing, the EPA encourages a cooperative effort by the different operators at a site to prepare and participate in a comprehensive SWPPP.

Individual operators at a site may, but are not required, to develop separate SWPPPs that cover only their portion of the project as long as reference is made to other operators at the site. When there is more than one SWPPP for a site, coordination must be conducted between the permit holders to ensure storm water discharge controls and other measures are consistent with one another (e.g., provisions to protect listed species and critical habitat).

The SWPPP must be prepared in accordance with good engineering practices, and shall identify potential sources of pollution which may reasonably be expected to affect the quality of the storm water discharges from the construction site. The SWPPP shall describe and ensure the implementation of best management practices (BMPs), which will be used to reduce the pollutants in storm water discharges associated with

construction activity at the construction site and assure compliance with the terms and conditions of the construction general permit.

Following the SWPPP inspection, the inspector will do a site inspection with the site Superintendent. He will take the site's erosion control drawing along to determine whether BMPs have been implemented in accordance with the SWPPP.

City inspectors will also check to see whether site operators have posted a notice near the main entrance of the construction site with the following information:

1. NPDES permit number for the permit of the project or a copy of the NOI if a permit number has not yet been assigned;
2. Name and telephone number of a local contact person;
3. A brief description of the project; and
4. Location of the SWPPP if the site is inactive or does not have an on-site location to store the plan.

At the conclusion of the inspection, the Inspector will sit down with the site Superintendent, explain where the site is deficient, and generally give the Superintendent seven (7) days to get the site in order.

A follow-up inspection will be conducted as quickly as possible, generally within seven (7) to ten (10) days. An inspector will "pop-in" randomly during this time, or may just make a drive by inspection of the site to ensure compliance.

During the Inspector's visit to a site, he/she determines that no NOI has been filed for the site with the EPA, he/she will bypass the site Superintendent and will deal directly with the owner of the construction company or the property owner.

During rain events, the inspectors check as many job sites as possible to determine whether non-storm water discharges are being made from the site. Operators of sites are subject to receive a Notice of Violation (NOV) from the City if such discharges are being made. In appropriate circumstances, the inspector may issue a citation, which carries a criminal fine of up to 2,000 Dollars per day per violation.

The City's authority to inspect construction sites comes from Part VI, Section O of the construction general permit itself:

"The permittee shall allow...and authorized representative of the municipal owner/operator or the separate storm sewer receiving the

discharge, upon the presentation of the credentials and other documents as may be required by law, to:

1. Enter upon the permittee's premises where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this permit;
2. Have access to and copy at reasonable times, any records that must be kept under the conditions of this permit; and
3. Inspect at reasonable times any facilities or equipment (including monitoring and control equipment)."