Large Scale Site Inspections (LSSI)

Department of Environmental Quality
Office of Training Services



Your Instructor



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Questions: certification@deq.virginia.gov



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Ground Rules

- Silence your cell phones
- · Ask questions, engage with groups
- Groups of five people, please
- Speak and share your thoughts
- Be supportive of all participants
 - Let's do a quick intro roundtable!





COMING ATTRACTIONS

Continuing Education Courses

https://www.deq.virginia.gov/our-programs/training-certification/continuing-education

Large-Scale Construction Site Inspections (full:
Predericksburg)

Refresher for Inspectors (Full:
Phy

Regulatory-SWPPP Inspections (fairfax)
Phy

Large-Scale Construction Site Inspections (Wytheville)

Large-Scale Construction Site Inspections (Wytheville)

Large-Scale Construction Site Inspections (Wytheville)

Ling the Virginia Stormwater Management Handbook (77/09/2025 8:30 AM - 4:30 PM

Using the Virginia Stormwater Management Handbook (88/thmond)

Ling the Virginia Stormwater Management Handbook (98/thmond)

Large Scale Construction Site Inspections (Chesapeake)

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The purpose of this class

Six contact hours are given for completing this course. Hours earned may be applied to ESC/SWM/Dual Inspector recertification.

No partial credit is given





Course Sections

- 1. Inspection Preparation
- 2. SWPPP Overview Part I
- 3. Critical Plan Reading Skills for Large Sites
 - Plan Reading Activity
- 4. SWPPP Overview Part II
- 5. Documenting "Site Walk" Observations
 - Site Walk Activity



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Agenda

- Morning: Intro and Preparing for Inspections
- Break: 10am
- Mid-morning: Comparing "typical" inspections to LSSI
- Lunch: 12pm
- After lunch: Reviewing frequently changing SWPPP documentation and plans for LSSI
- Break: 2:30pm
- Afternoon: Site walk and field observations



Learning Objectives

- Being prepared for LSSI before leaving the office
- Understanding how SWPPPs differ on large sites
- Familiarizing yourself with large ESC/SWM plans and tactics for directing field inspections
- Determine priority inspection areas through all phases of construction
- Understanding the process from ESC measures to SWM control installations



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Large Scale Site Inspection – Section 1

Inspection Preparation



What is a Large Scale Construction Site?

100+ acres sites

- Solar Farms
- Data Centers
- Distribution Centers
- Large Subdivisions
- Other examples?

LSSI | Section 1: Inspection Preparation



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What's the difference?





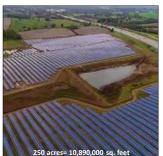
1 acre= 43,560 sq. feet

250 acres= 10,890,000 sq. feet

LSSI | Section I: Inspection Preparation



What's the difference?



1 acre= 43,560 sq. feet

LSSI | Section I: Inspection Preparation



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What's the difference?

So, what do you guys think?

LSSI | Section 1: Inspection Preparation

DEO

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What's the difference?

• So, what do you guys think?

LARGER vs "TRADITIONAL" SITES

- Rising Complexity
- Increased Risk/Hazards
- More SWPPP Documentation
- Longer Timeframes
- Requires Detailed Sequencing/Phasing
- Inspectors MUST be organized

LSSI | Section I: Inspection Preparation



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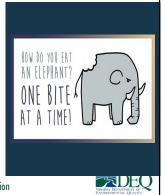
Preparing for the Inspection

Larger sites take longer to inspect



Preparation is critical! > Try not to get overwhelmed

LSSI | Section 1: Inspection Preparation



Preparing for the Inspection The Who. What, Where, Why, and *How*??? **DEO** LSSI | Section I: Inspection Preparation

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Preparing for the Inspection

Who:

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- Is the
- Operator/permittee?
- Are the Duly Authorized Representatives?
- Are the Qualified Personnel inspecting the
- Is your site contact person?
- Will be part of the inspection?









LSSI | Section I: Inspection Preparation

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Final Preparation Do you have the proper PPE? Hard Hat Safety Glasses Hi-Vis Vest Gloves "These boots were made for walking"...but are they? Insect Repellant, Sunscreen • Site/Company specific reqs. (steel vs composite-toe boots, FR material, safety debriefs) LSSI | Section 1: Inspection Preparation









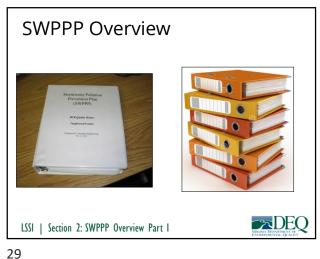
DEQ

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SWPPP Overview Part I **DEQ** LSSI | Section 2: SWPPP Overview Part I

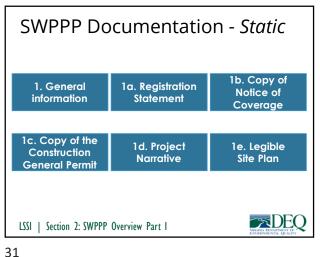
SWPPP Documentation 3. Approved 1. General 2. Approved information ESC plan SWM plan 5. Impaired waters, 6. PCB impaired 4. P2 plan or sediment/nutrient waters and TMDL TMDL, + Exceptional requirements 7. Turbidity 9. Duly Authorized Representative 8. Qualified personnel Requirements 12. Amendments, 10. SWPPP signature Modifications, & Updates **DEO** LSSI | Section 2: SWPPP Overview Part I

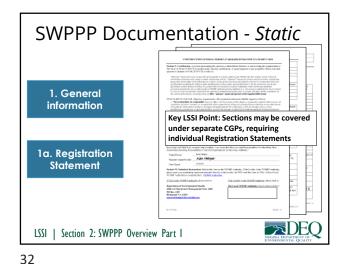


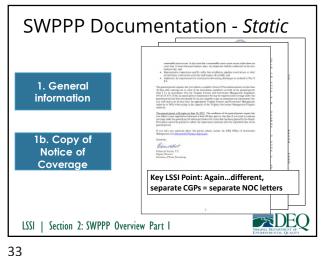
SWPPP Documentation - Static 1. General 3. Approved 2. Approved SWM plan information **ESC** plan 5. Impaired waters, or sediment/nutrient waters and TMDL 4. P2 plan TMDL, + Exceptional requirements 7. Turbidity 9. Duly Authorized 8. Qualified Monitoring personnel Representative Requirements 12. Amendments, Modifications, & 10. SWPPP signature Updates DEC LSSI | Section 2: SWPPP Overview Part I

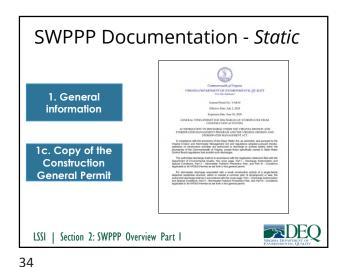
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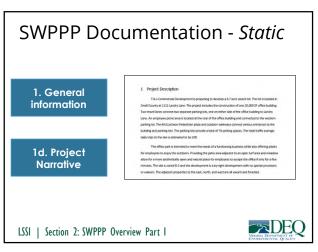
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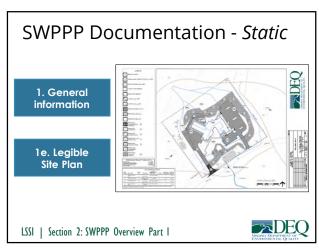


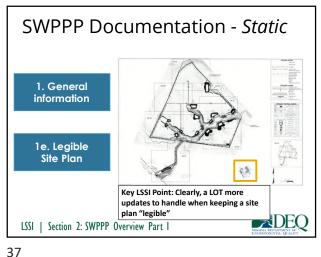


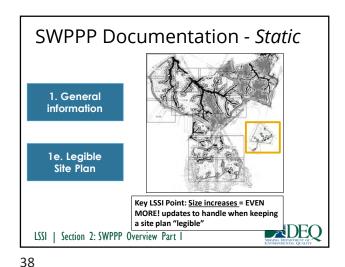


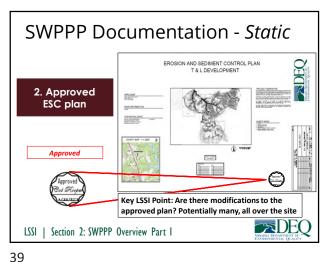


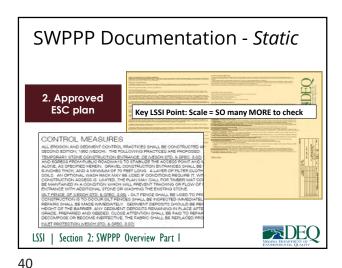


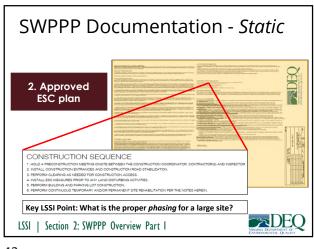


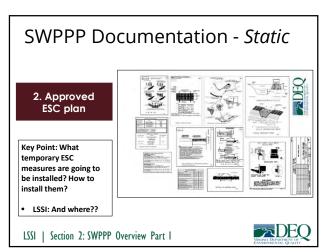


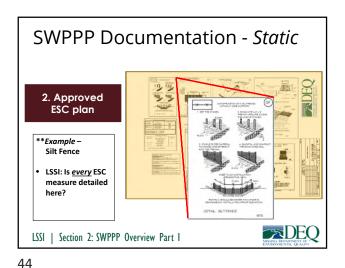


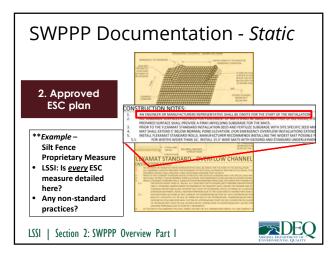


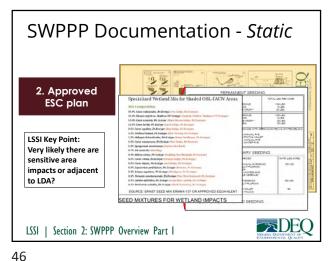


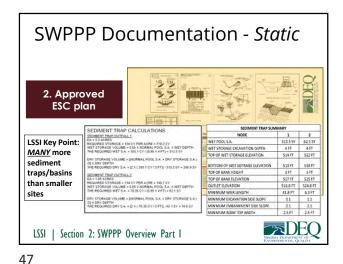


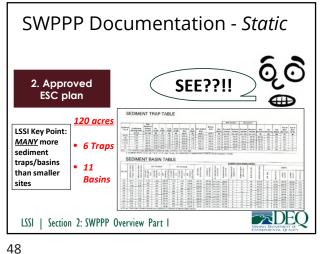


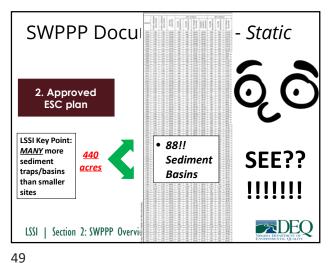


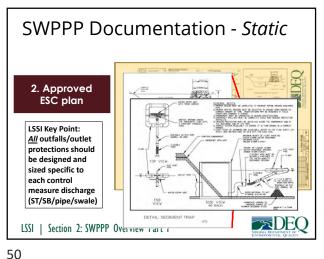


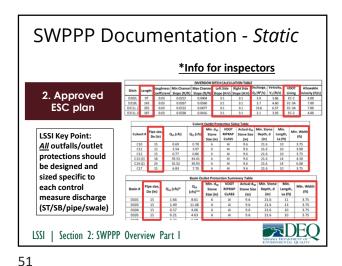


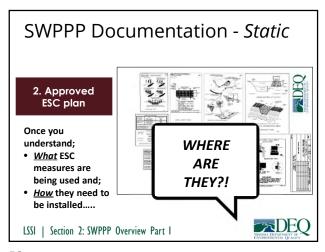


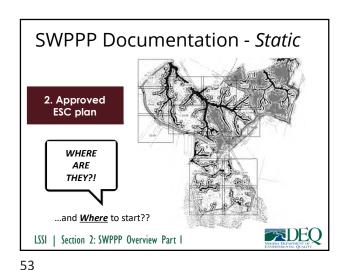


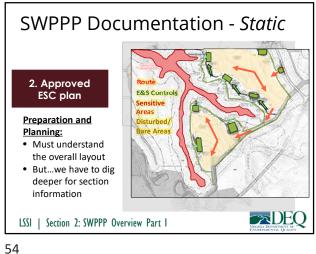


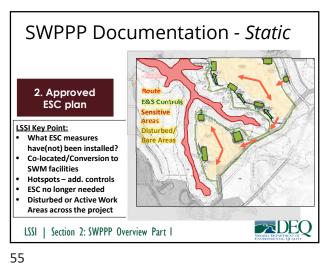


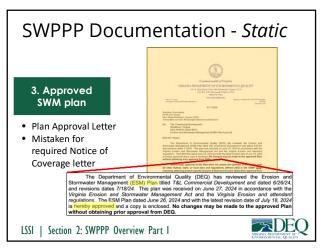


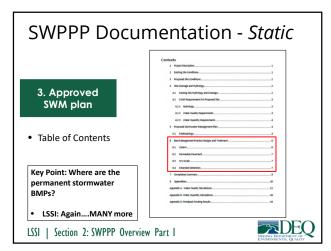


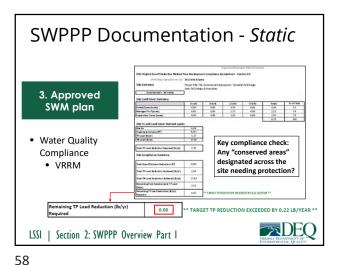


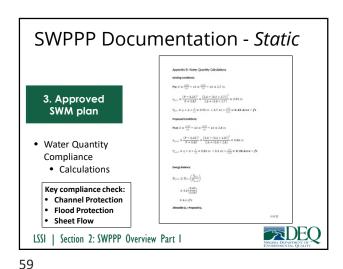


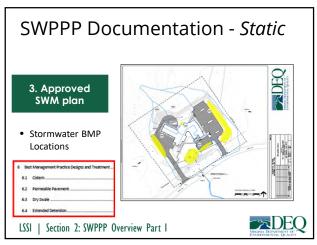


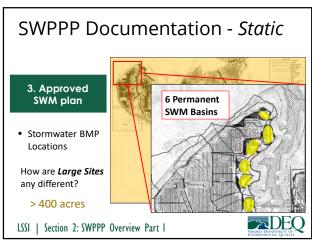


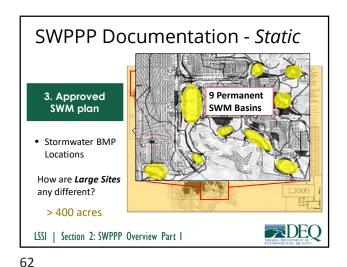


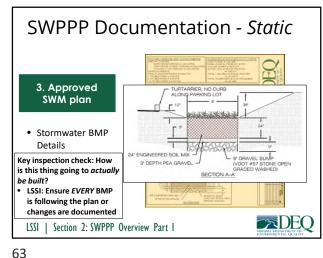


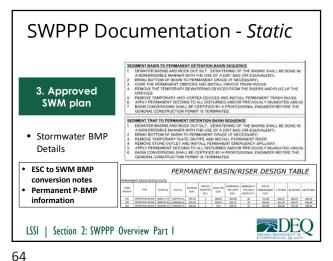




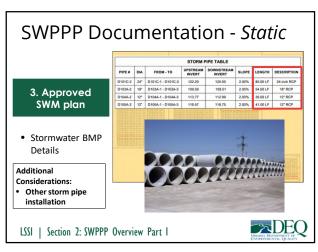


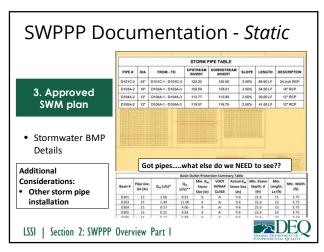




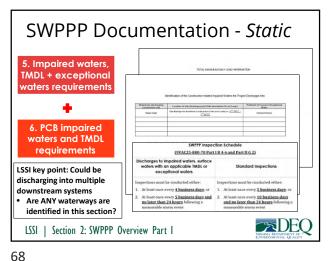


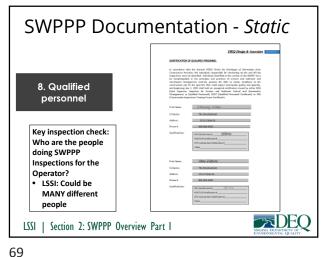
SWPPP Documentation - Static PERMANENT BASIN/RISER TYPICAL DETAIL 3. Approved SWM plan Stormwater BMP IND SERIES TRASH RACK Details All BMPs are converted per the SWM Plan (field check) Proper materials Watertight connections LSSI | Section 2: SWPPP Overview Part I

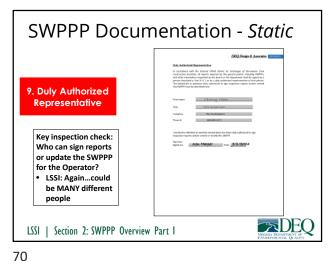




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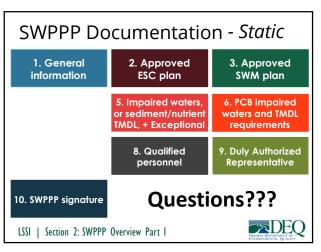






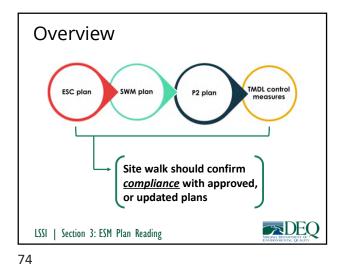
SWPPP Documentation - Static 10. SWPPP signature Key inspection check: Is this the signed. official copy of the SWPPP? LSSI: Many SWPPP copies could be floating around DEO LSSI | Section 2: SWPPP Overview Part I

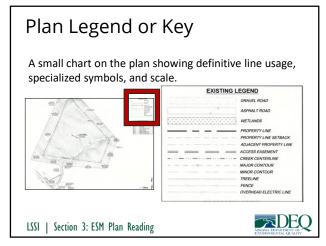
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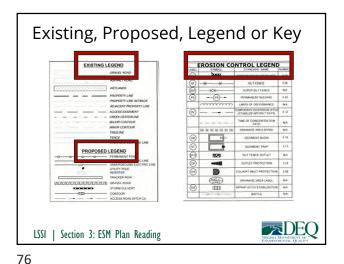


ESC and SWM Plans Section 3: What's the Plan?? Hands-on Activity -Digging into an Erosion Control and Stormwater Management Plan **DEO**

72 73

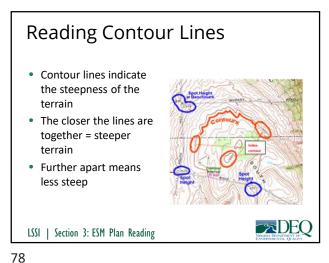


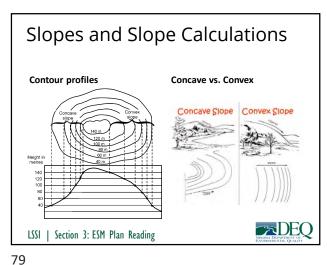




Reading Contour Lines · Existing contours are usually shown as lighter gray or dashed lines Proposed contours are usually shown as solid black Existing **Proposed** contours contours **DEO** LSSI | Section 3: ESM Plan Reading

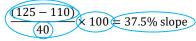
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Calculating Slope Steepness

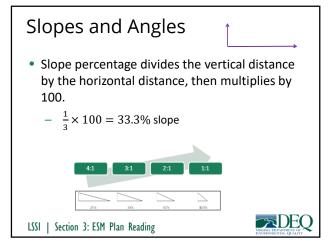
- Choose two points of interest
- Find the elevation change (rise)
 - Subtract the two points of interest
- Measure the slope length (run)
- Divide rise/run
- Multiply by 100



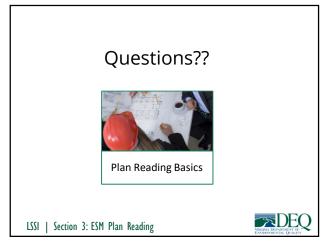
LSSI | Section 3: ESM Plan Reading



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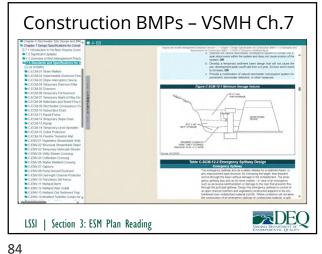
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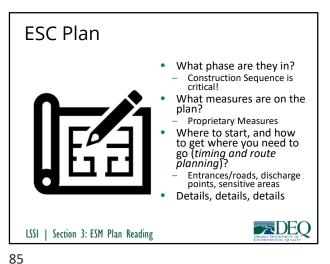


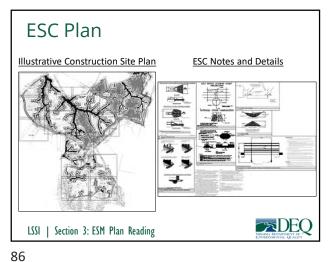
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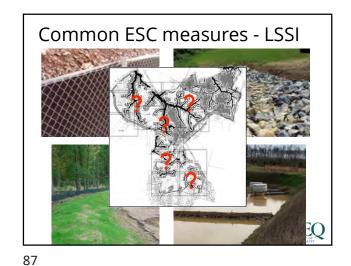


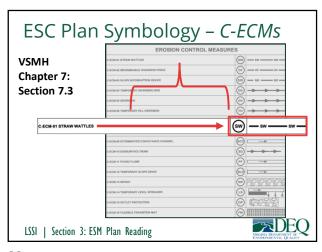
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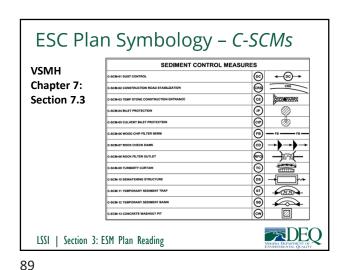


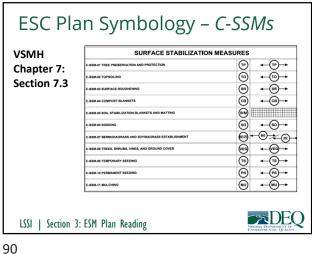


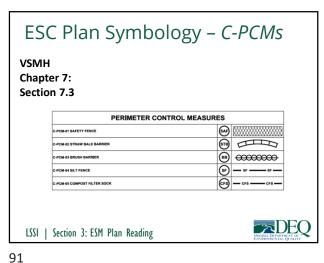


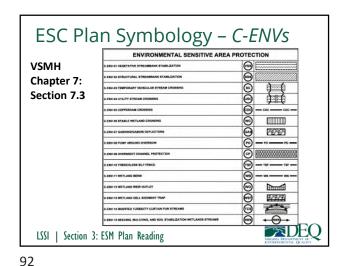


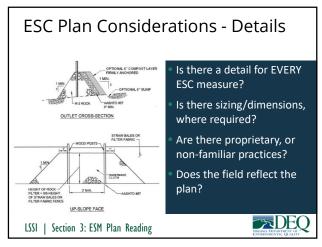












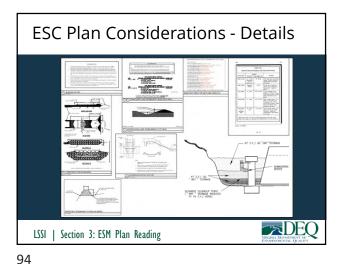
SWM Plan

<u>17 Non-proprietary P-BMPs</u>

- P-BAS - Basins: Four (4) Measures

- P-CNV - Conveyances: Four (4) Measures

LSSI | Section 3: ESM Plan Reading



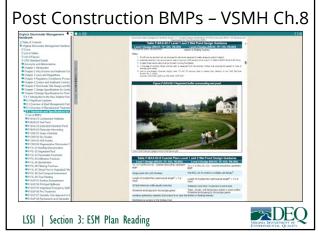
P-FIL – Filtration/Infiltration: Nine (9) Measures
 Support Components

 P-SUP: Six (6) Components
 General information used across multiple P-BMPs

Post Construction BMPs - VSMH Ch.8

DEO

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Locations of post-construction BMPs

 Co-located BMPs

 Phased section and BMP installation timing?

 What sections are older, newer, closed, etc.?

 How are the permanent measures labeled?

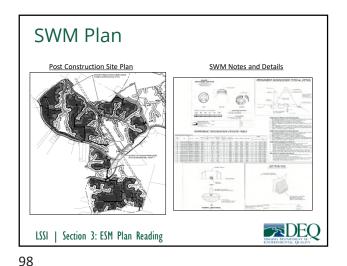
 Are P-BMPs being protected during construction/installation?

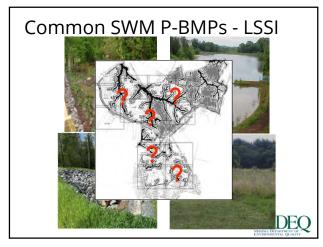
 Are there critical areas/hotspots on site?

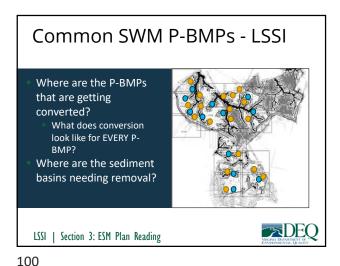
 P-BMPs near fueling areas, soil stockpiles, heavy-traffic

 Plan details for materials, sequencing, storage capacity, final stabilization

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Questions for Conversion

- Does conversion need to happen now?
- Does CONVERSION need to happen NOW?
- DOES CONVERSION NEED TO HAPPEN NOW?
- What does conversion look like?
 - Following sequence, final grading, outlet protection design, additional materials, As-builts, etc.
- Who is responsible for maintenance on <u>installed</u> <u>SWM facilities</u> <u>during</u> and <u>after</u> construction?

LSSI | Section 3: ESM Plan Reading

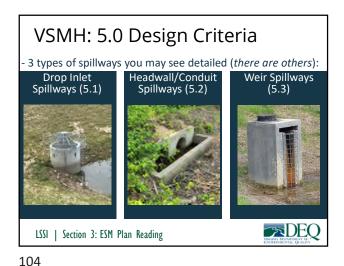
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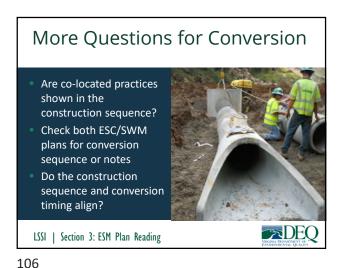




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SWM Plan Considerations –

Details/Final As-builts

Is there a detail/final As-built for EVERY SWM measure?

Is there sizing/dimensions for permanent facility installations?

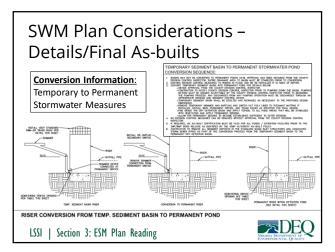
Are there proprietary, or non-familiar practices?

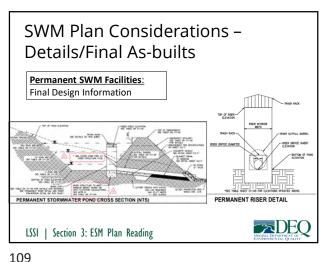
Manufacturer's specifications/inspections

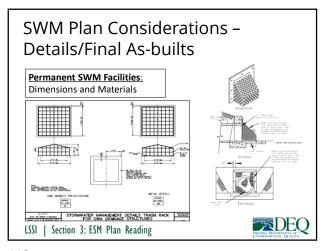
Geotechnical information

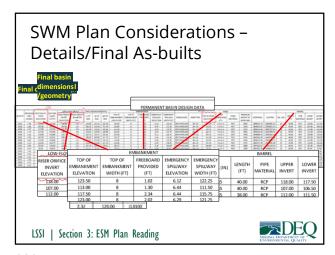
Documentation may be separate from SWM Plans

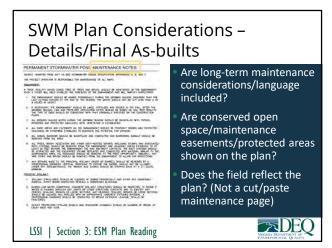
LSSI | Section 3: ESM Plan Reading







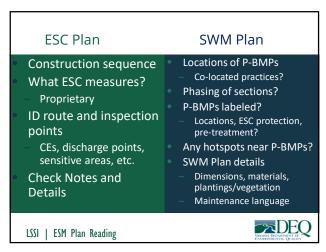


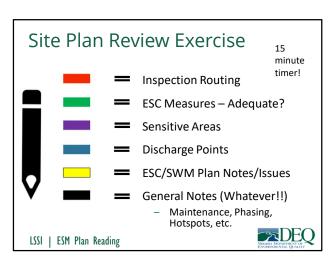


Site Plan Review Exercise Groups look for a set of information Document observations or issues What do you think the plan/site needs? Are there critical areas on site? About 15 minutes per plan review Some LSSI considerations? are not included in the VSMH are not Things we've already ndorsed for use by DEQ. Material is for training purposes ONLY. discussed... **DE** LSSI | ESM Plan Reading

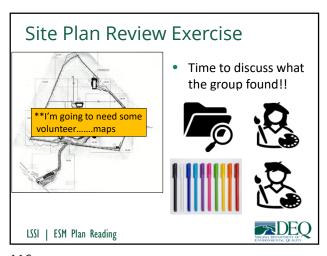
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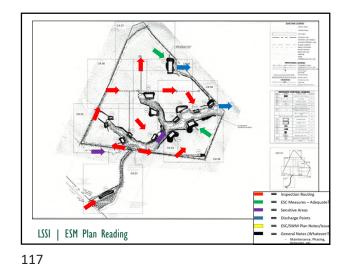
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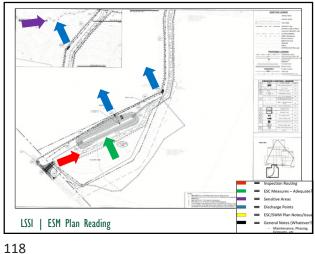


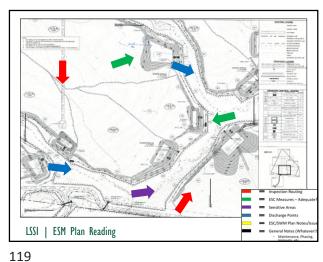


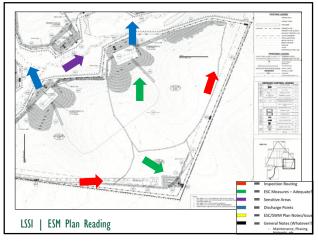
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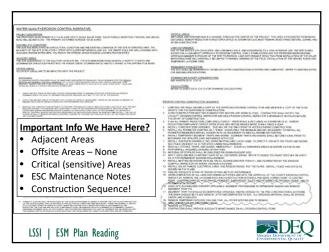


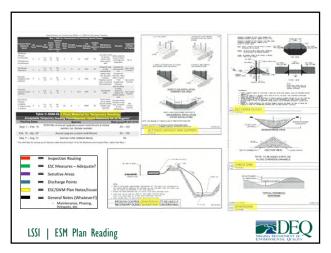


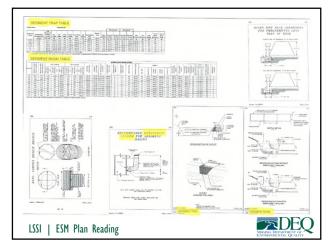


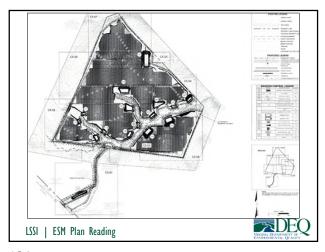


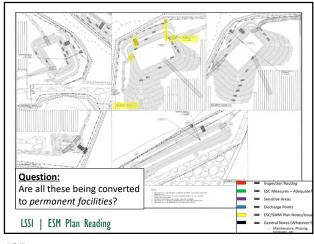




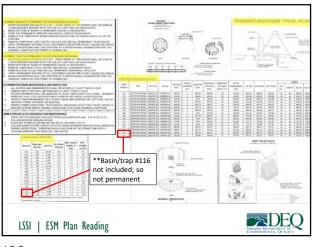


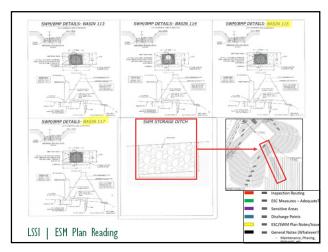




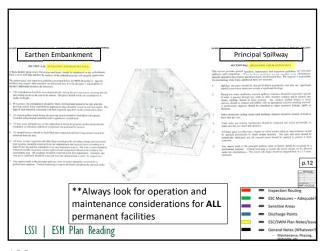


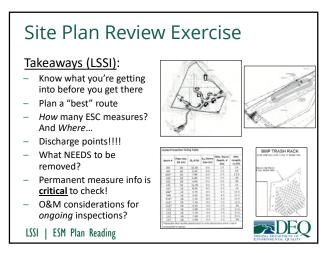
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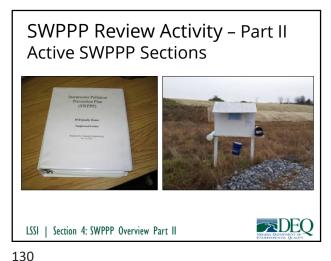




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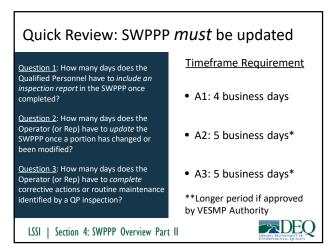


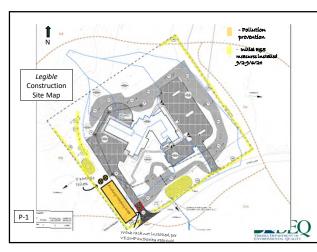




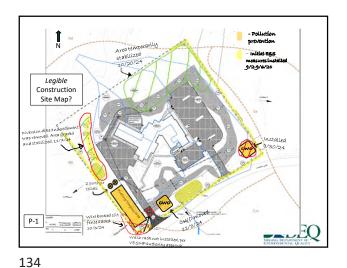
SWPPP Documentation - Active 3. Approved 1. General 2. Approved ESC plan SWM plan information 5. Impaired waters, 6. PCB impaired 4. P2 plan or sediment/nutrient waters and TMDL TMDL, + Exceptional requirements 7. Turbidity 8. Qualified 9. Duly Authorized Monitoring personnel Representative Requirements 12. Amendments, 10. SWPPP signature Modifications, & Updates DEC LSSI | Section 4: SWPPP Overview Part II

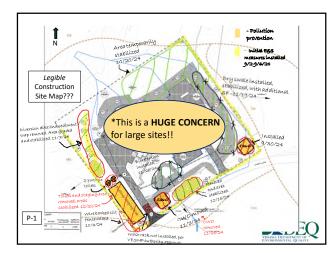
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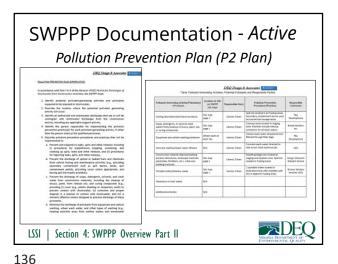


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Pollution Prevention (P2) Practices

- Must be site specific within a SWPPP
- Shall be followed to prevent pollutant releases
- Denotes all relevant, specific P2 practices
- P2 plans are not usually reviewed except by the inspector on-site
- Documentation updated as conditions change (P2 measures added, moved, or removed from the site)
- Inspection Point:
 - What and Where onsite?
 - Site and documentation match-up?

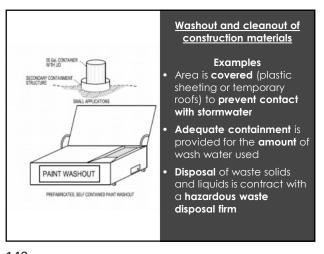
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Leak and spill prevention and response plan

Procedures must be in place for quickly stopping, containing, and cleaning up spills, leaks, and other releases

Procedures must be in place for documenting and/or reporting leaks, spills, and other releases

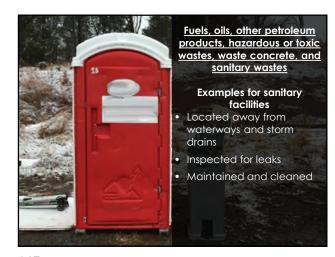
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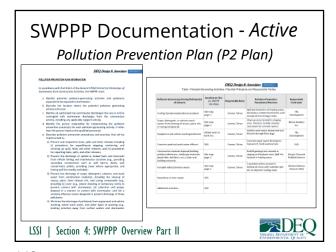


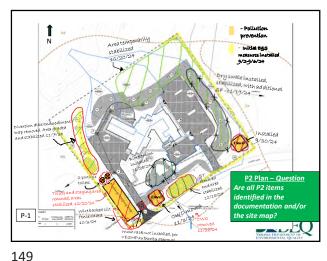


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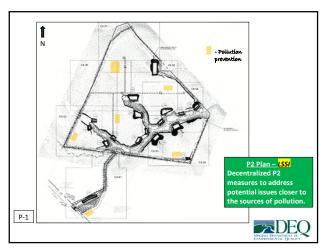


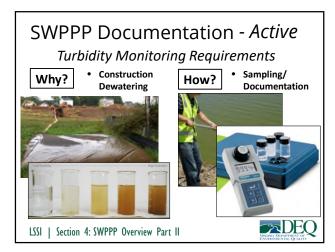




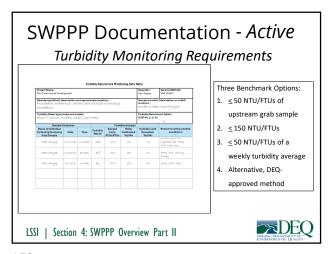


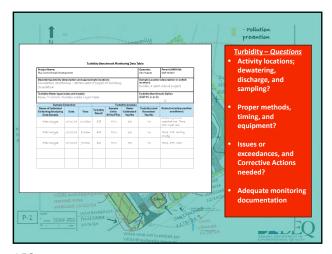
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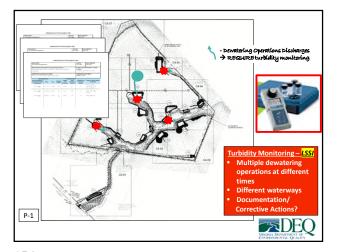




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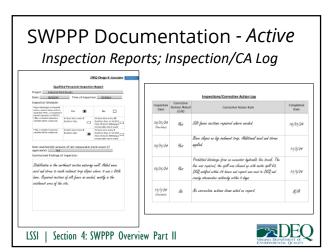






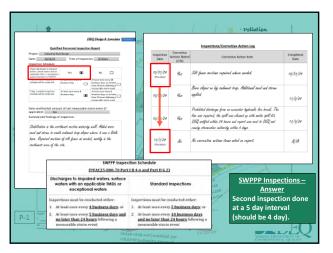
SWPPP Documentation - Active **Turbidity Monitoring Requirements** • EPA Guide for Construction Dewatering https://www.epa.gov/system/fil es/documents/2022-01/cgpinspection-and-monitoringguide-for-dewatering.pdf -**EPA Turbidity Monitoring under** the Federal Construction General Permit: https://www.epa.gov/npdes/turb idity-benchmark-monitoringdewatering-under-constructiongeneral-permit -**DEO** LSSI | Section 4: SWPPP Overview Part II

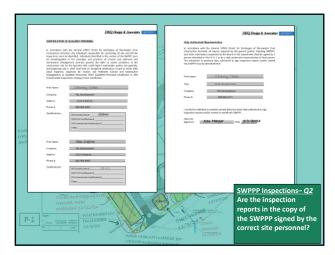
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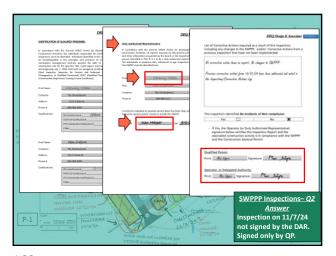


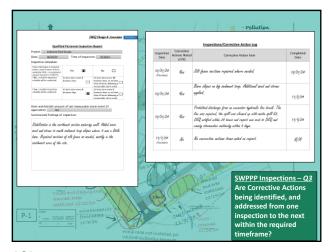
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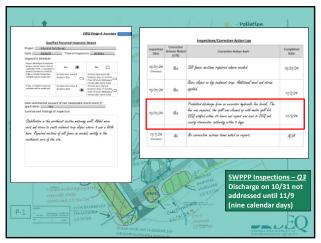


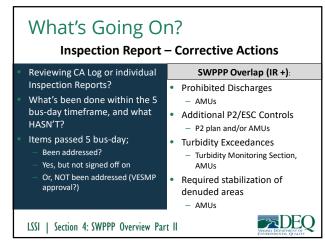




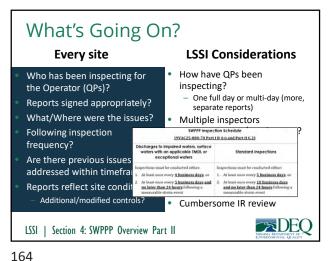


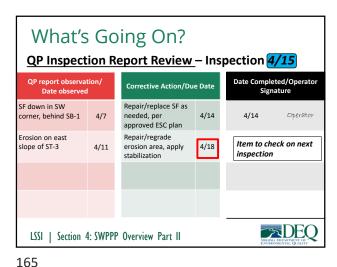
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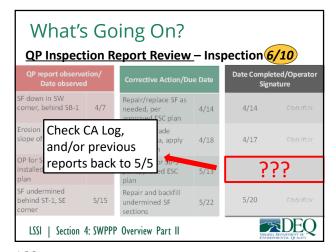




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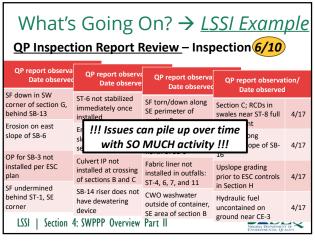




What's Going On? → LSSI Example **QP Inspection Report Review - Inspection 4/15** Date Completed/Operator Corrective Action/Due Date Date observed Signature SF down in SW Repair/replace SF as Operator corner, behind SB-1 4/7 needed, per 4/14 4/14 approved ESC plan Erosion on east Repair/regrade Item to check on next 4/18 4/11 erosion area, apply slope of ST-3 stabilization inspection How are Large Sites any different? **DEO** LSSI | Section 4: SWPPP Overview Part II

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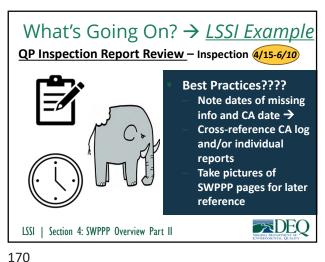
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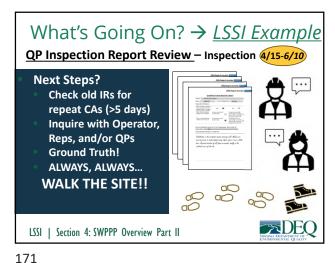


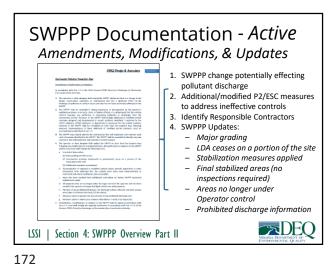
What's Going On? → LSSI Example QP Inspection Report Review - Inspection 4/15-6/10 CA-1 4/24 4/24 Issue 1 4/17 4/22 Issue 2 4/17 CA-2 4/24 CA-3 4/30 4/25 4/23 Issue 3 CA-4 Issue 4 4/29 Issue 5 4/29 What could be 5/5 Issue 6 5/13 Issue 7 5/9 happening.... 5/22 5/15 5/22 5/22 5/19 5/15 Issue 11 5/21 CA-11 5/28 11 5/27 5/27 CA-12 6/3 Issue 12 Issue 13 5/27 CA-13 6/3 13 6/1 6/2 CA-14 6/9 14

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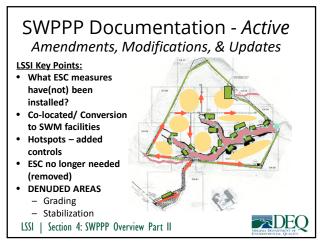






SWPPP Documentation - Active Amendments, Modifications, & Updates *Alternative Recordkeeping: AMUs (and other SWPPP sections) may come in different varieties depending on what template being used: Grading Log Land Disturbance Log Porta-John Tracking Prohibited Discharge Log **Cutsheet Updates** Other Examples? TDEC LSSI | Section 4: SWPPP Overview Part II

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What's Going On? **LSSI Considerations** Every site SWPPP Overlap (IR +): Prohibited Discharges Cumbersome document review Even MORE documentation Additional P2/ESC Controls P2 plan and/or AMUs New sections opened? Turbidity Exceedances Increases inspection area(time) - Turbidity Monitoring Section, Stabilized sections closed? Older sections may not need Required stabilization of inspecting once fully stabilized denuded areas ESC→SWM considerations AMUs **SDE** LSSI | Section 4: SWPPP Overview Part II

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SWPPP Overview: Key Points and Considerations

- Is Everything There? (take your time)
- Who's WHO?? (QP, Duly Authorized Rep, Operator, subcontractors, 3rd party, localities)
- Corrective Actions? ...Perfect Inspections?!
- Alternative Recordkeeping: Grading Log, Cutsheet updates, Multiple SWPPP binders, etc.
- Documentation: More is Better...Sort of

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SWPPP Overview: Key Points and Considerations

- Summary of best management practices
 - Take enough time to understand documentation
 - Take notes and pictures of documents, especially missing info
 - Organize notes and pictures to easily reference later without confusion
 - Cross-reference missing information with other sections of the SWPPP (Ex: IRs and AMUs)
 - Talk with interested parties (QPs, Operator, etc.) to ensure a compliance strategy can be accomplished

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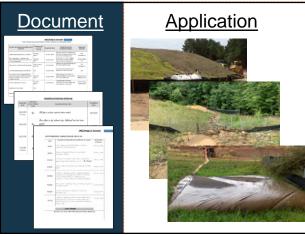
Large Scale Site Inspection – Section 5

Boots on the Ground

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Document

Application

When the Board of Modern and Application and Applicatio

Prohibition of Non-stormwater Discharges

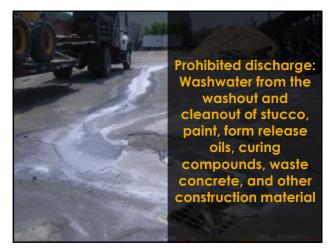
- Look out for the following prohibited discharges!
- If you see any, take pictures and note them on your inspection report
- Larger sites have *more* potential pollution issues

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Construction BMPs - VSWHB Ch.7

- Structural practices
 - **C-ECM** Erosion Control Measures
 - o C-ENV Environmentally Sensitive Area Protection
 - **C-PCM** Perimeter Control Measures
 - **C-SCM** Sediment Control Measures
 - o For sediment control; second line of defense
- Vegetative practices
 - **C-SSM** Surface Stabilization Measures
 - o For erosion control, first line of defense

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Erosion Control Measures (ECM)

- · Prevent sheet, rill and gully erosion
- Reduce the overland flow velocities
- Shorten the length of flow
- Divert and convey runoff safely through a site

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Erosion Control Measures (ECM) **Outlet Protection Slope Drains** DEC | Section 5: Boots on the Ground

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Environmentally Sensitive Area Protection (ENV)

- Used in environmentally sensitive areas (stream corridors, wetlands, floodplains)
- Applied where disturbance in an environmentally sensitive area is necessary

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Perimeter Control Measures (PCM)

- Intercept sheet flow from slopes
- · Remove sediment and other contaminants through:
 - Ponding
 - Settling
 - Physical filtration
- Prevent contaminants from leaving the

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Sediment Control Measures (SCM)

- Prevent sediment from leaving the site
- Capture or filter sediment particles

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Sediment Control Measures (SCM)





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Sediment Control Measures (SCM)



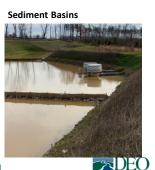


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Sediment Control Measures (SCM)





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Sediment Control Measures (SCM)

Sediment Basin - Alternative



https://stornwater.pca.state.mn.us/index.php?title=Construction_sto mwater_treatment_dewatering, including chemical treatment and sediment filtration

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Surface Stabilization Measures (SSM)

- Protect disturbed soil from surface runoff
- Both temporary covering and permanent vegetative cover
- Often part of the final landscape

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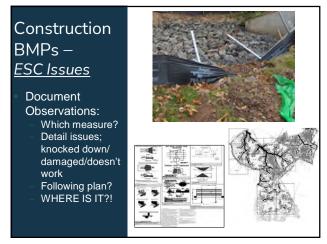
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Post-Construction BMP Overview

Basins – P-BAS

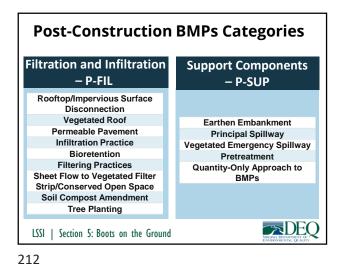
Conveyance – P-CNV

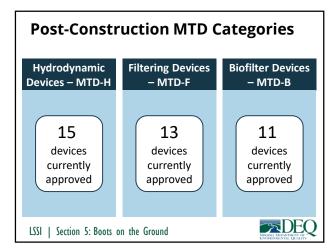
Constructed Wetlands
Wet Pond
Extended Detention Pond
Rainwater Harvesting

Conveyance

Grass Channels
Dry Swales
Wet Swales
Regenerative Stormwater
Conveyance

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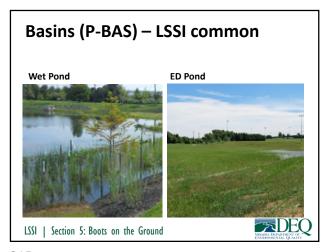


- Designed to detain or impound runoff
- Typically provide little to no infiltration
- Provide treatment through settling, runoff reduction and biologic uptake

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Conveyance (P-CNV) 8.3.2

- Designed to receive a sustained concentrated flow of runoff or cross significant changes in grade
- Typically provide filtration, infiltration and settling within the conveyance system.

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Conveyance (P-CNV) — LSSI common

Grass Channels/Dry Swales Wet Swales

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Filtration and Infiltration (P-FIL) 8.3.3

 P-FIL practices are designed to filter runoff through a natural or engineered media, returning any remaining runoff to a drainage system or infiltrating into native soils

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Support Components (P-SUP)

- Provide more generalized information that can be used across multiple different P-BMPs
- To be used in combination with other P-BMPs described in this Handbook

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Support Components (P-SUP)

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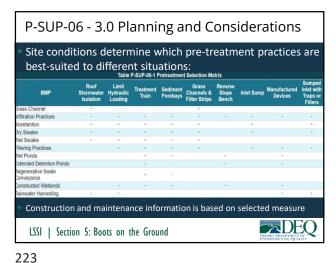
Filtration and Infiltration (P-FIL) – LSSI common

Section 5: Boots on the Ground

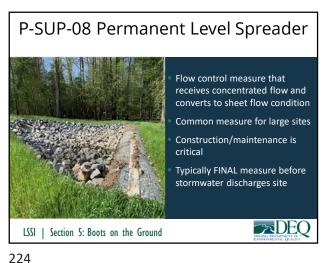
Bioretention

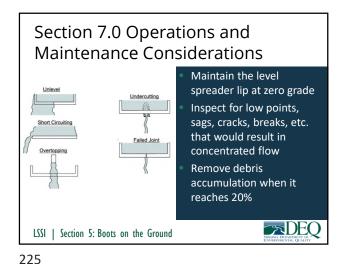
Sheet Flow to COS

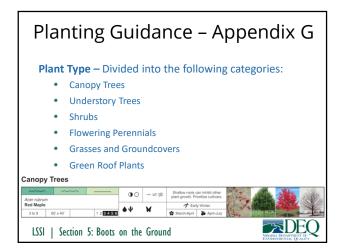
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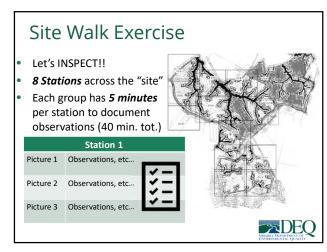


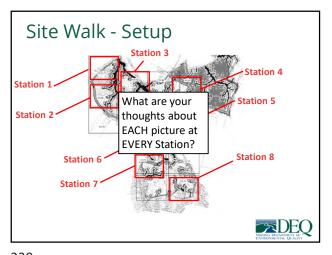




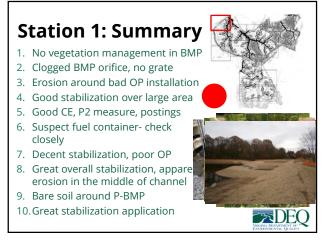
Questions?









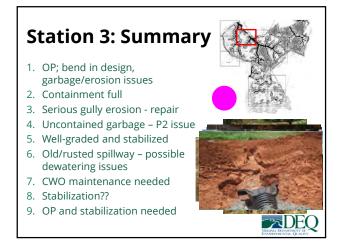


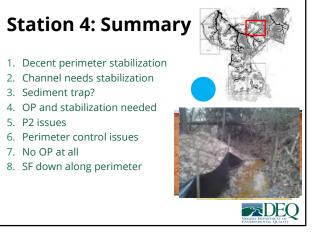
Station 2: Summary

1. Good stabilization coverage
2. Looks full of sediment, concerned with erosion underneath
3. Good spillway installation and stabilization
4. CWO; NOT leak-proof, replace
5. Gully erosion NEEDS repair
6. Decent BMP installation/stabilization
7. No stabilization or OP; possible wet storage problem
8. No perimeter controls!
9. Decent install - OP looking good

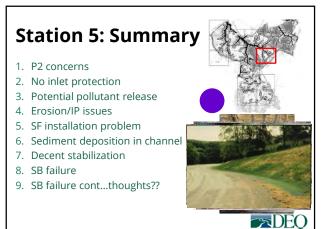
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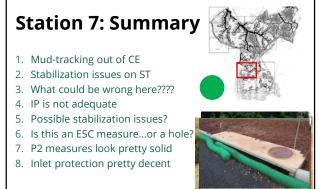
Station 6: Summary

- 1. CWO...bad
- 2. Silt fence down repair
- 3. Good P2 implementation
- 4. Decent TS around stockpile
- 5. Mix of good and bad
- 6. OP needed
- 7. Erosion....
- 8. Also erosion concentrated in channels, off-site or on-site
- 9. SB; wet storage? Other issues??



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Station 8: Summary

- 1. SB needs stabilization
- 2. Rock filter outlet looks decent
- 3. Perimeter control installation
- 4. SB installation ongoing OK?
- 5. P2 containment successful
- 6. IP; weird design check plan
- 7. Perimeter access ongoing thoughts??

THANK YOU ALL!

8. Stabilization above pipe



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Site Walk Review

- LSSI Takeaways:
 - So many issues to find
 - How many??
 - A LOT to "ground truth" from SWPPP
 - Route/site walk planning and timing critical
 - Typically, a lot to followup with on subsequent inpsections



DEO

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