

Electronic Site Inspection Guide for Operators

All sites requiring permit coverage must have a SWPPP that is accessible (for audit/review) by the oversight authority. The SWPPP should include all required elements outlined in Part 7 of the CGP (UTRC00000) or Part 4 of the CPP (UTRH00000), including: inspection reports, corrective action logs, updated site map, a copy of the NOI, and any other relevant documentation. It is imperative that this SWPPP be kept current.

Inspection documentation must include all of the items listed in Part 4 of the CGP or Part 3 of the CPP as applicable. Both the CGP and CPP are subject to Utah State Code. Per newly passed law (Utah Code 19-5-108.3), MS4s must conduct "electronic site inspections", which the law defines as "geo-located and time-stamped photos taken, evaluated, and submitted electronically by the permittee to the municipal system." In order to meet both the requirements of the new law, and those of the MS4 Permit with the State (which requires SWPPP audits and site inspections at a monthly frequency, or bi-weekly if a priority site, per the MS4), it is necessary that the electronic site inspection photos and all current SWPPP documentation be either submitted electronically to the MS4, or made available online. Whatever method is preferred, the system must retain the documentation for 5 years so that MS4s can access during an audit by DWQ or EPA.

Photos must be date/time and geolocation-stamped, provided in their original form, and clearly capture all areas where BMPs are implemented. Ensure the images offer full, clear views that accurately reflect the complete scope of BMP installation and effectiveness. It is essential that sediment, erosion, and pollution prevention controls are located and installed based on: (1) the site map, (2) the materials and methods specified in the BMP chosen for the project

The electronic site inspection documentation submitted (or made available) to the MS4 must **at a minimum** include:

1. Project name, UPDES permit number, date of inspection, contact information of inspector, and summary of the inspection findings. If a rain event triggered the inspection, include rain gauge readings (CGP 4.7.1). Utah DEQ provides a SWPPP Inspection Form for operators to utilize to record this minimum information as well as record actions taken to correct issues. See [SWPPP Inspection Form](#). This can be the format for submission to the MS4.
2. First photo should show the CGP/CPP sign according to the requirements of 1.5 and 7.4.1 of the CGP/CPP accordingly. This includes:
 - the UPDES Permit tracking number
 - the name of the contact person for questions, SWPPP requests, or information about the project (contact phone number or an email address)
 - How to access the SWPPP document (on site location, electronic access, etc).
 - Location of the sign (should be in a safe, conspicuous, and publicly accessible location near the entrance)
3. An updated, accurate and legible copy (or image) of the SWPPP site map must be provided.

4. Each BMP photo must show all angles of the BMP necessary to determine compliance. For subsequent inspections, take photos from the same locations to give the inspector a more comprehensive understanding of site conditions over time.

At minimum take photos of:

- Cleared, graded, or excavated areas that have not yet achieved final stabilization
- Locations where stabilization measures have been implemented
 - Ex: vegetation or non-vegetative covers
- Stormwater controls installed on-site, including erosion, sediment, and pollution prevention BMPs
 - Ex: wattles, spill-kit area, geotextile blankets
- Material, waste, borrow, and equipment storage and maintenance areas
- All areas where stormwater flows, including natural or constructed drainage features that divert, convey, or treat stormwater
 - Ex: curbs, swales, ditches
 - linear curb every 400 feet or less
- Area storm drain inlets
 - Close up of pollutant catchment for inserts
 - Show area upstream of inlets as well
- Discharge Points
 - visible erosion, sediment deposits, and the characteristics of any active stormwater discharge (e.g., color, solids, foam, oil sheen)
- Exit Points
 - Include end of approved trackout to access effectiveness
 - 90 degrees at the start of trackout
- Perimeter control
 - Every 400 feet or less of the entire perimeter and particularly at lowest points
 - Silt fence every 200 feet
- Concrete/stucco washout
- Fixed fueling points
 - Fuel hose from 15 feet or less
- Waste management
 - Show that dumpster is sealed and cover available if blowables are present
- Portable toilets.
 - Opposite sides and any tie downs or stakes used to hold toilets in place
- Staging areas.
- Show that no pollutants are leaking from vehicles or equipment.

5. SWPPP logs and content must be kept current and **submitted (along with the pictures) by the 1st of each month** (or 1st and 15th if the site is prioritized for bi-weekly inspections) to SLCDPU and can be **no older than 7-days before the 1st** (or 1st and 15th). This allows for SLCDPU-SWQ to complete our compliance inspection remotely with documentation that is current and reflective of the site conditions and SWPPP implementation status. Submission can be accomplished through a 3rd Party compliance software package that will retain the documentation, or through a Cityworks website that the City will provide any operator that lacks a means to submit in another manner. Please reach out to Stormwaterquality@slc.gov (801-483-6729) if you require the Cityworks portal.

The MS4 may conduct an on-site inspection if the MS4 has a documented reason for justifying an on-site oversight inspection. Justification could include:

- The electronic site inspection report and/or correction documentation reviewed by the MS4 is insufficient to determine compliance with the CGP or CPP
- Non-compliance is not corrected within the time-frame given for corrective action
- An immediate and/or imminent threat to water quality is identified (through complaints or an inspection report)
- An illicit discharge has occurred on the construction site that must be addressed by the MS4
- The Operator has submitted an "Operator Opt-Out" form, granting permission for on-site inspections

Routine Maintenance vs Corrective Action

Routine maintenance refers to actions that improve the function of the applicable BMP and do not require a new or replacement control or significant repair.

Corrective action items must be addressed as soon as practicable. For corrective action items that require "a new or replacement control or significant repair, install the new or modified control and make it operational, or complete the repair, by no later than seven (7) calendar days from the time of discovery. If it is infeasible to complete the installation or repair within seven (7) calendar days (e.g., due to availability of materials, excessive costs to expedite shipping or activities, or lengthy installation times) you must document in your records why it is infeasible to complete the installation or repair within the 7-day timeframe and document your schedule for installing the stormwater control(s) and making it operational as soon as feasible after the 7-day timeframe." (5.2.3 CGP)

If an oversight inspector is on site, they may issue a notice of violation for failing BMPs or any imminent threat to public safety, the MS4 system, or waters of the state. The MS4 has an escalating enforcement policy according to the *state law 19-5-108.3(11)(a)-(f)*.