WPCM: The Brain of the Contractor’s SWPPP Compliance

The Water Pollution Control Manager (WPCM) is the lynch-pin in Contractor stormwater compliance.

They visit the project weekly during normal business hours; thoroughly review and update all SWPPP documentation ensuring Contractor compliance; supervise and direct the Contractor and all subcontractors work with regards to complying with the SWPPP and NPDES; ensure all BMP’s are fully implemented, installed and maintained correctly; maintain Construction Stormwater Training (CSW) and an active email address; review and sign inspection reports with 3 days; and are the point of contact for KDOT regarding stormwater compliance.

With all these responsibilities what happens when the WPCM is also the Environmental Inspector?

When the WPCM and Environmental Inspector are combined the expectations for NPDES compliance increase dramatically. The 24-hr lag time between the inspection and submittal to the WPCM and Area Engineer are basically eliminated. Knocking out the lag time allows the WPCM to immediately begin coordinating with the prime contractor and subcontractors to correct all deficiencies found by the report. The WPCM will also know what exact BMP’s need to be used, how best to install them and quantities needed. Finally the WPCM also maximizes his time to notify the Area Engineer if special remedies are needed to complete all deficiencies with 7 calendar days or if conditions are infeasible to complete all deficiencies.
End of a Era: Last of the EIT/EMT Certification

The final remnants of the 2013 Consent Decree are coming to ending. What are those you might ask? The biennially (or yearly if a contractor) Environmental Inspector/Manager certifications.

The final EIT/EMT certifications expire October 11, 2019. Construction Stormwater (CSW) combines and replaces those certifications making stormwater compliance potentially easier.

With these expiring certifications, inspectors, WPCMs and Area Engineers need to be doubly aware that all certifications are up to date in the SWPPP. Area Engineers, before approving SWPPPs make sure that all environmental inspectors and WPCMs are certificated in CSW and that the expiration date happens after the tentative Notice of Acceptance date. Notify the contractor of their expiring certification and make sure they are signed up for the next available class. The earliest expiring CSW is March 2022.

Inspectors, the 247, when filled out correctly, states the expiration date for all who signs the form. Check the certification dates at part of the routine/rain event inspection. If the certification is/has expired notify the Prime Contractor immediately so they can provide a replacement.

Prime Contractors, you are ultimately responsible to maintain CSW certifications. Remember the contractor is liable for disincentive assessment for any SWPPP inspections not preformed according to 901.3e including inspections done without current certification.

---

Stormwater Update Online

This issue and all past issues of this quarterly bulletin are available online at KDOT’s Stormwater website: http://www.ksdot.org/burconsmain/Connections/swppp.asp

Contact Mervin Lare (mervin.lare@ks.gov) for questions, comments or suggestions for future content.