

Construction Site Run-off Control – MCM #4

Part II.C.b.4.

Responsible Person:

Identify the responsible person(s) for implementing this MCM. There may be more than one person or different departments responsible for various projects. If so, discuss.

- 18.a. Name: Karen E. Kirtley [Ron May]
 18.b. Title: Assistant Vice President for Administration
 [Director of Facilities, Planning and Management]
 18.c. Department: Administration
 18.d. Address: One John Marshall Drive, Huntington, West Virginia 25755-5320
 18.e. Phone number: (304) 696-3328 [(304) 696-2585]
 18.f. Email address: kirtley@marshall.edu [mayr@marshall.edu]

18.g. Is another entity sharing responsibility for this MCM? If so, who? No

Control Objective & BMPs

- 18.h. State your overall objective for this minimum control measure.
 Marshall University will develop and implement a program to address stormwater runoff for construction projects that disturb 1 acre or more to minimize water quality impacts.
- 18.i. State and describe your BMPs. Indicate which BMPs are part of your existing program.
- a. Marshall University will ensure that construction projects disturbing over 1 acre of land have an approved registration under the WVDEP's General National Pollutant Discharge Elimination System (NPDES) Permit for stormwater associated with construction activities.
 - b. Marshall University will review WVDEP stormwater requirements with contractors at the beginning of projects. If projects last longer than one year, a follow-up review will be conducted on a yearly basis.
 - c. Marshall will prepare language for the contract documents describing the stormwater management responsibilities that the contractor must abide by.
 - d. Marshall University will train staff on site review, inspection, and enforcement procedures. Marshall University will include on the bid documents procedures for stormwater management. These procedures will be designed by the civil engineer of record and approved by Marshall University. Staff will enforce requirements per the pre-determined guidelines set forth on the contract drawings. Enforcement procedures will follow the same guidelines as all other contractual agreements beginning with verbal notifications to written notifications and then work performed by another entity at the contractor's expense.
 - e. Marshall University will develop lines of communication with contractors in case of spills or releases. Marshall will aid the contractor with resources needed to contain the spills or releases.

MCM Components

Part II.C.b.4.a.

18.j. Do you have an Ordinance to control construction site run-off? No

Part II.C.b.4

- 18.k. Does your program regulate disturbance of one acre or more and also less than one acre if part of a larger common plan? Does your Ordinance regulate disturbances of less than one acre? If so, what is the size threshold?

Marshall University does not have an ordinance regulating stormwater discharges from construction sites. Marshall University will completely follow and abide by WVDEP's general NPDES permit for construction site stormwater. Marshall University will utilize the one acre threshold.

Part II.C.b.4.a.i-ix.

- 18.l. Does your Ordinance contain the nine required components?

Marshall University does not have the capacity to enact ordinance. However, Marshall will prohibit and reduce the pollutants emanating from construction sites by:

- a. Informing the contractor that appropriate BMPs (as stated in the WVDEP BMP handbook) must be used. A section in the contract documents will include the necessary measures.
- b. Reviewing the construction drawings prior to construction to determine if appropriate BMPs are on the site plan and how water quality at the site will be protected.
- c. Performing weekly site inspections to determine if BMPs are being used correctly. The inspector will also perform inspections within 24 hours after a storm event greater than 0.5 inches of rain per 24-hour period to ascertain the BMP's effectiveness. If appropriate BMPs are not being used, the inspector will inform the contractor and shall oversee that the BMPs are installed/constructed. Inspection reports will be kept and input in a database.
- d. Enforcing the contract documents. If the contractor does not abide by the contract documents, he will be in default of contract.
- e. Providing a sign at the construction site for the public to provide any comments or concerns. Telephone numbers to the appropriate staff and the web address to Marshall 's MS4 website will be provided.
- f. Provide information and/or training to people that are on construction sites, including site operators. The WVDEP BMP Manual will be used as reference material. If training classes become available by the WVDEP, Marshall will pass along the information to current and potential contractors.

Tip: The nine required components your ordinance must address include: Sediment & erosion control BMPs; requirements for construction site operators to actually implement these BMPs and to control waste; demonstration of appropriate NPDES registration; authority for site plan review; authority for public input; authority for site inspections & enforcement; adequate funding for inspections & enforcement; and training for construction site operators.

Part II.C.b.4.b.

- 18.m. Describe the plan review process for your construction site run off program.

Marshall will use WVDEP general NPDES permit standards to review construction plans. Administrators will review the plans and comment on (if needed) changes needed to the plans. The contractor will make the changes and resubmit.

- 18.n. Describe the inspection process of your construction site run off program.

Inspectors will perform weekly site inspections. The inspector will also perform inspections within 24 hours after a storm event greater than 0.5 inches of rain per 24-hour period to ascertain the BMP's effectiveness.

- 18.o. Describe the enforcement process of your construction site run off program.

Inspectors will inform the contractor that items need addressed. If the contractor continues to not

use BMPs correctly, he could become in default of the contract.

Part II.C.b.4.b.

- 18.p. Discuss how your program will address the regulation of both private and public sector construction site run-off.

Marshall University will abide by the WVDEP general NPDES permit for construction site stormwater. Marshall University will not adopt an ordinance.

Schedule

Part II.C.b.4.a.

- 18.q. The Ordinance shall be reviewed on an annual basis. Describe your Ordinance review and update procedures.

Administrators will review inspector's comments, contractor's comments and the public's comments to determine if the procedures are adequate. Also, a review of the WVDEP general NPDES permit will be reviewed to see if any information was changed and needs to be updated.

- 18.r. If your Ordinance does not contain the standards required by the permit, provide a schedule for implementation and measureable goals for getting these components into your Ordinance. Include a mid-point and full implementation date.

Mid-point date – Six months after approval of the MS4 general permit. Full implementation date: Twelve months after approval of the MS4 permit.

Tip: The components of your construction site runoff control program must include:

- Plan review and approval process for new development and redevelopment projects
- Inspection protocol
- Development of enforcement strategy
- Education and training for construction site operators
- Development of an application process.
- Record keeping for approved projects, inspections, and enforcement.

Measurable Goals

Part IV.A. & Part II.B.4

- 18.s. List and fully describe your measurable goal(s) for this minimum control measure.
- a. Complete training of staff that will perform review, inspections, and enforcement at construction sites.
 - b. Verify that each construction project disturbing 1 acre or greater has an approved site registration prior to the commencement of construction. Record the number of projects with a site registration under the general permit.
 - c. Document that stormwater compliance will be addressed during a pre-construction conference with the contractor(s).
 - d. For each construction project, Marshall University will establish contact for quick reference by project team members for reporting and emergency response following spills or releases. Any spills or releases will be addressed per the Marshall University emergency management plan.
 - e. Inspectors will perform monthly site inspections. The inspector will also perform inspections

within 24 hours after a storm event greater than 0.5 inches of rain per 24-hour period to ascertain the BMP's effectiveness.

- f. Inspectors will inform the contractor that items need addressed. If the contractor continues to not use BMPs correctly, he/she could become in default of the contract and possibly removed from the project.

Tracking

Part II.B.7.

18.t. Describe your plan for tracking activities associated with this minimum control measure.

- a. Verify that each construction project disturbing 1 acre or greater has an approved site registration prior to the commencement of construction. Record the number of projects with a site registration under the general permit.
- b. Document that stormwater compliance was addressed during a pre-construction conference with the contractor(s).
- c. For each construction project, Marshall University will establish contact for quick reference by project team members for reporting and emergency response following spills or releases.

Evaluation

Part II.B.7

18.u. Explain how you plan to gauge the effectiveness of your Construction Site Run-off Control program. Marshall will evaluate the effectiveness by keeping record of the number of violations found on site. Inspectors will note violations in their logs. If an excessive amount of violations are being reported additional education pertaining to Site-Runoff Control will be required for the contractors.