

# Internal Operating Procedure

## BMP 4.02 EROSION AND SEDIMENT CONTROL SITE PLAN REVIEW AND APPROVAL

February 2022

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### I. Background

The University of Nebraska-Lincoln holds a Small Municipal Separate Storm Sewer Systems General NPDES Permit NER310000 with NDEE. This requires UNL, as a SMS4 permittee, to review and approve contractor-provided site map(s) showing the entire site during grading, construction, and post-construction phases, if the site is subject to NDEE's Construction Storm Water General Permit, NPDES Permit Number NER210000. EHS is the review and approval authority for UNL. The site maps must contain all of the information described in Part III.B.2 of the NDEE NPDES General Permit Number NER210000 for Storm Water Discharges from Construction Sites to Waters of the State of Nebraska. Each earth disturbing construction project 1 acre or more, or less than an acre but part of a larger common plan of development is subject to this review and approval process. Construction projects that are considered routine maintenance to maintain the original line and grade, hydraulic capacity, or original purpose of the facility are exempt from the NER210000 permit. Synthetic turf field replacement projects greater than 1 acre are exempt as long there is no land disturbance when the projects replace the infill and turf mats. Contact EHS if you are unsure if your construction project would need permit coverage under NER210000. Construction projects that meet this criteria are henceforth referred to as permitted construction sites

### II. Review and Approval Process

Contractors (or an authorized representative) of the permitted construction site must submit their Notice of Intent (NOI) and SWPPP, containing legible site map(s) showing the entire site during grading, construction, and post-construction phases, to [Stormwater@unl.edu](mailto:Stormwater@unl.edu) at least seven (7) days prior to breaking ground on site. The qualified EHS Specialist (as defined in the UNL stormwater management plan) has seven (7) days to review and approve items within the SWPPP that address Part III.B.2 of the Construction General Permit using the attached checklist. Contractors (or an authorized representative) must submit whatever documents contain information pertinent to Part III.B.2 and clearly explain where to find required information. This IOP is limited to the **initial review** process which considers conditions as they are understood at time of submittal. EHS is required to document this review process using this checklist in the stormwater management BMP 4.02 permit file for the corresponding year for when the review began. Any issues, missing information, or request for clarifications after EHS has received the plan must be resolved before a written letter of authorization is issued. Communication regarding the resolution of any issue identified during this initial review process should be filed alongside this checklist. Once the letter of authorization is issued, the EHS Specialist must update the inventory on file of all active public and private construction sites authorized within the MS4 boundary.

*(Created 12/17; Revised: 02/2022)*

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Exact dates for when construction begins at a site is entirely under the control of the Facilities Planning and Construction (FPC) department; however, land disturbance at permitted construction sites is only authorized by UNL once the project has received an authorization letter from EHS and NDEE approving the SWPPP, NOI (Notice of Intent), and supporting documents. Stormwater controls must be placed at the jobsite in accordance to the SWPPP before earth disturbing activities can start and the SWPPP and site map(s) must be updated as site conditions change. EHS will evaluate whether the SWPPP (including site maps) is current during on-going inspections of permitted sites. Deficiencies shall be noted in the audit findings and communicated to the Contractor in accordance with BMP 4.03 Construction Site Inspection and Enforcement procedures. This IOP should be used as a reference when evaluating the SWPPP and site maps on an on-going basis.

SWPPP writers can use this list to make sure they have all required components of the SWPPP that will be reviewed for approval. The SWPPP, site maps, and supporting documents must identify the following when applicable:

- a. Direction(s) of storm water flow and approximate slopes anticipated after major grading activities;
- b. Areas of land disturbance and areas of land that will not be disturbed:  
Land that will be disturbed and land that will remain undisturbed throughout the construction must be clearly defined. For example, if there are sensitive tree areas, vegetative buffer zones areas, or portions of the site not to be touched, they should be clearly defined. It is a Best Management Practice to thoughtfully consider the least amount of earth disturbance a site needs or to sequence grading so that one area is stabilized before another is disturbed, in order to reduce bare ground that must be controlled.
- c. Locations of major structural and nonstructural Best Management Practices (BMPs):  
Structural BMPs are stationary BMPs that are designed, constructed, and operated to prevent or reduce the discharge of pollutants in stormwater. This can include temporary controls such as wattle barriers and construction entrances or permanent post-construction BMPs that will remain onsite after construction is completed. Non-structural BMPs focus on preserving open space, protecting natural systems, and incorporating existing landscape features so that stormwater is managed at its source.
  - I. Sediment and Erosion Control: Appropriately design, describe, phase, and locate effective erosion and sediment controls that minimize the discharge of pollutants in stormwater from the construction site.
  - II. Dewatering BMPs: The site must have a dewatering strategy in place and supplies on hand to deal with large rain events where stormwater must be pumped from excavation pits. If groundwater will be encountered, a separate NPDES Dewatering permit is required.
  - III. A narrative and/or location describing how or where these practices will be employed is required when applicable: concrete washout control, dust control method, construction entrance, street sweeping, litter control; fuel storage and fueling operation controls, and portable toilet location and/or controls.
  - IV. Provide a narrative and/or location describing controls in place that protect sensitive areas or natural flows when applicable. Examples of sensitive or natural flow areas that would need to be protected: natural systems, open space, wetlands, trees, streams, lakes, special habitats, other special assets, etc.)
  - V. Permanent Post-Construction Stormwater Control Protection: If applicable, all permanent stormwater control features must be protected with appropriate controls to ensure these features function as designed after final stabilization has been achieved including areas where there should be minimal soil compaction (e.g. areas that will be used for infiltration).
- d. Locations where stabilization practices are expected to occur:

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- I. Indicate where temporary or permanent stabilization measures will occur during each phase of the construction.
  - II. Temporary stabilization must occur on the site as soon as practicable, but no later than 14 days in portions of the construction site that have temporarily or permanently ceased. There are a few exceptions to this rule. (Refer to Construction General Permit Part III.F.1.) It's important to anticipate this measure as much as possible so that stabilization of disturbed areas and stockpiles can occur when required.
- e. Locations of onsite or offsite material, waste, borrow or equipment storage areas:
    - I. UNL often allows contractors to store construction items offsite since space is limited within campus. These must be called out in the plans including hazardous waste/material storage.
  - f. Locations of all Waters of the State, including wetlands
    - I. This should be a map or narrative that explains where your project discharges into a Water of the State, and any wetlands.
  - g. Locations where storm water discharges to a surface water:
    - I. This can either be a narrative explanation, or a proximity map. All construction on UNL campus discharges to either Antelope Creek (City Campus), Dead Man's Run (East Campus), or Salt Creek (Innovation Campus).
  - h. Location of the perimeter controls, if used, installed to retain sediment from storm water runoff from earth disturbing activities:
    - I. Perimeter control examples include silt fence, wattles, etc. They should be installed on the downhill slope of a project, or around the entire perimeter on sites that have little to no slope.
  - i. Areas where final stabilization has been accomplished and no further construction-phase permit requirements apply (this is evaluated during on-going compliance inspections of permitted construction sites)
    - I. Indicate where work may have already been completed.

### III. Erosion and Sediment Control Plan Checklist

EHS Reviewer(s) Name: _____
Review process start date: _____
Project Name and UNL FPC Number: _____

*Any items marked "No" must have a response submitted before authorization will be issued*

Have maps showing the entire site during each phase been submitted:

**Yes No N/A**

- Grading Phase
- Construction Phase
- Post-Construction Phase

Does the SWPPP and supporting documents contain information about the following:

**Yes No N/A**

- Direction of storm water flow and approximate slopes anticipated after major grading activities
- Areas of land disturbance and areas that will not be disturbed are clearly defined
- Locations of major structural or nonstructural BMPs such as:
  - Sediment and Erosion Controls
  - Dewatering Controls
  - Concrete washout controls
  - Method of dust control
  - Construction entrance control
  - Street sweeping
  - Litter control
  - Fuel storage and/or fueling operation controls
  - Portable toilet location and/or controls
  - Protection of sensitive areas or natural flow areas (vegetative or riparian buffers, areas of special value, etc.)
  - Measures to protect Permanent Post-Construction Stormwater Controls (PCSWCs)
  - Other: (Describe in comments)
- Locations and/or methods of stabilization practices that are expected to occur

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Locations of onsite:	Locations of offsite:
<p><b><u>Yes No N/A</u></b></p> <p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Material storage</p> <p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Waste storage, including Hazardous waste</p> <p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Borrow</p> <p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Equipment Storage Areas</p>	<p><b><u>Yes No N/A</u></b></p> <p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Material storage</p> <p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Waste storage, including Hazardous waste</p> <p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Borrow</p> <p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Equipment Storage Areas</p>

**Yes No N/A**

- Locations of all Waters of the State, including wetlands
- Locations where stormwater discharges to a surface water
- Locations of perimeter controls installed to retain sediment from stormwater runoff from earth disturbing activities
- Areas where final stabilization has been accomplished and no further construction-phase permit requirements apply (evaluated during on-going compliance inspections of permitted construction sites).

Comments:

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*EHS Reviewer Compliance Checklist:*

Has this review been completed by qualified personnel? Yes  No

To the best of your ability does this initial review of the erosion control plan and supporting documents contain appropriate site-specific construction site control measures that meet the minimum local requirements for storm water protection of construction activity? Yes  No  Initial of Reviewer: \_\_\_\_\_

If no, have the issues identified by this initial review process been resolved and communication attached? Yes  No

Date authorization letter was issued and the construction inventory list was updated: \_\_\_\_\_