

Construction Stormwater CGP Comment

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Wed 12/16/2020 4:58 PM

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Comment #1: With respect to sections Part I Section E.2 Monitoring and Part 1 Section E.6 Site Inspection Requirements, the requirement for all third party consultants to have the CCR Certification in order to conduct inspections under E.2 and E.6 is not reasonable unless the Department improves access and opportunity to obtain the CCR certification for the industry at large.

As currently constructed the ability to obtain the CCR certification is limited due to huge demand and infrequent certification Courses as well as inefficient logistics in having to attend an in person course for consecutive weeks instead of consecutive days within the same week.

E.2 Monitoring

For the purposes of this Part, the operator(s) must conduct maintenance inspections of erosion and sediment controls and constructed stormwater management measures at least weekly.

The Secretary may require additional monitoring on a site following written notification. After the first earth disturbance occurs on the site, and thenceforth during the entire period of permit coverage whether the site is active or inactive, the permittee shall conduct inspections of the permitted area.

The person(s) inspecting the site must be a responsible person or a CCR. The responsible person and CCR must have successfully completed a Department-sponsored certification course.

E.6 Site Inspection Requirements

E.6.1 Person(s) Responsible for Construction Review. The person(s) conducting the construction review shall be responsible personnel, as defined herein, and/or a third-party certified construction reviewer (CCR) hired to conduct such construction reviews.

The permittee is responsible for ensuring the qualifications of the person(s) conducting these construction reviews are satisfied.

Unless specifically waived by the plan approval agency, all construction activities are required to conduct a preconstruction meeting. The person(s) responsible for conducting the construction review shall attend the preconstruction meeting.

E.6.2 Frequency of Construction Reviews. Construction reviews must be conducted at least once every seven (7) calendar days.

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