**Colorado Stormwater Excellence Program (CSEP)**

**Third-party Construction Reviewer (CR)**

**Field Inspection Process**

May 15, 2013

Updates:

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**Introduction:**

Third-party monthly inspections are performed by CSEP Advisory Board (Board) approved Construction Reviewers (CRs). These inspections are a requirement for participation in the CSEP and are used to independently measure a company’s corporate commitment, accountability systems/procedures and documentation systems/procedures, as well as to provide compliance assistance. CRs utilize a CSEP-approved standard field procedure to document compliance and a standard scoring system to measure the severity of observations or “findings”. The process is photographically recorded by the CR and entered into a secure database that is only viewable by the Participant and the CR who performed the inspection.

1. **General overview of the monthly CSEP CR inspection process:**
   1. CSEP inspections services are contracted and paid for by the Participant directly with an approved CR. Site inspection schedules for each project may be coordinated in a general way with the Participant’s home office to avoid scheduling inspections that conflict with regular weekly project meeting days and Qualified Person planned vacations. Although some conflicts may be unavoidable, full Participant project team participation is always encouraged to maximize the training and compliance assistance benefits of the CR monthly inspection process.
   2. The Participant Qualified Person may receive notice of the pending monthly inspection the day prior in some cases where project access is a challenge, but this is not a requirement or obligation of the CR and is not standard practice.
   3. The Participant’s Qualified Person is strongly encouraged, but not required to participate in the monthly inspection. CR monthly inspections should mirror the USMS inspection process that the Participant has been trained to follow in the USMS Advanced Stormwater Management Course. Using the USMS is also a “Basic” or minimum requirement for CSEP participation. Consistently modeling the full USMS compliance process for Participants is a primary goal for the CR.
   4. Baseline (or first) inspections on a project will usually take the CR between two and five hours to complete in the field and additional time should be expected to finalize the report in the CR office. The total time for the CR inspection will vary depending on the size and complexity of the project and the level of findings discovered.
   5. After the initial or baseline CR inspection has been completed, significantly less time should be expected will typically be required for future CR inspections
   6. The ComplianceWISE digital audit software is designed to evaluate and measure every aspect of NPDES CGP and local permit compliance in a systematic, organized process that must be followed by the CR during every CR inspection.
2. **CR Inspection Preparation Prior to Arriving at the Jobsite** 
   1. **Baseline or First Project Inspection**
      1. At least 24 hours in advance of arriving at the jobsite confirm:
         1. A purchase order or other contract has been fully executed
         2. Organization, project and contact information has been set up in the ComplianceWISE database for the Participant company
         3. Under the “Inspection Types” tab verify that a “CSEP Third-Party” has been created for the project or create this type of inspection using the “Create new Inspection” button
         4. Appropriate regulation sets have been chosen for all stormwater regulatory jurisdictions for the project’s geographic location
         5. Project-specific site contact, location and general information is complete and accurate. E.g., check the CWT-generated vicinity map against the address provided and against the latitude and longitude. Settle any discrepancies
         6. Participant’s SWMP Site Map(s) have been uploaded into the “CSEP Third-party” inspection type.
   2. **Field Inspection Process**
      * 1. See the separate CWT audit software usage guide with screenshots for step-by-step inspection and data entry process
   3. **Ongoing Monthly CR Inspections** 
      1. At least 24 hours in advance of arriving at the jobsite verify:
         1. The status of Participant corrective actions from the previous CR inspection
         2. A new “ready to perform” inspection has been generated in the database for uploading to an off-line operating platform
         3. The CR information is current and correct
      2. CR Inspection Process at the project site
         1. A thorough review of the SWMP documentation and a field evaluation of erosion, sediment and other pollution controls will be performed to verify “point-in-time” conformance with all applicable stormwater permits and the Participant’s SWMP. All suspected or known findings of permit non-compliance including non-conformance with the project SWMP will be photographed digitally recorded in the ComplianceWISE database.
3. **CR Standard Inspection Procedure for Monthly CSEP Inspections**

CRs **must** follow the CSEP CR inspection procedure every time they perform a CSEP monthly audit. This standard procedure is built into the ComplianceWISE inspection software making it less likely CR’s might accidentally overlook key evaluation and reporting requirements. It is generally agreed that strictly following standard audit procedures produces consistent, objective results to the maximum extent possible. The CSEP standard CR inspection process also serves as excellent training for Participants as CRs are modeling the same USMS methodology Participants use to achieve compliance.

The standard CR inspection process is generally as follows, but may be modified from time to time at the discretion of the Board:

1. **On-site Documentation Review**
   * 1. Upon initially arriving at the site, the CR should drive around the perimeter of the project, if accessible, and review the offsite conditions for evidence of illicit discharges and to assess the overall environmental impact of the project on the surrounding area. Illicit discharges might include tracking of soils off the site, construction trash that has blown off the site, failures of perimeter controls, and outfalls that show evidence of past or ongoing discharges of polluted stormwater, including pollution from sediment.
     2. Check in at the jobsite office and notify the Participant’s Qualified Person responsible for NPDES permit related compliance that a monthly CSEP inspection is being performed. The Qualified Person should feel encouraged to participate in all or any portion of the inspection.
     3. Begin the inspection by collecting and reviewing the SWMP and all associated or specifically referenced documents. The CR inspection process starts with a review of documentation. If the Participant is using a paper version (or hard copy) SWMP Site Map, begin by photographing the current SWMP site map(s) for entry under the “Site Maps” tab. This step is important for use during the field walk and the report preparation back at the office and should not be skipped. Findings discovered by the CR will be located and annotated on this photograph of the site map.
     4. The CR should err to the side of caution and should document everything they feel may be a finding of non-compliance even if it is questionable. Any number of photos can be taken if they seem important and can be placed in the “Reference Photos” tab for future evaluation. Extra photographs can easily be removed from a report later or simply left unassociated with anything in the report. They will not affect the Participant’s performance score and can be used for reference it the digital system later.
     5. Verify again all project-specific administrative information such as the name of the SWMP Administrator for the Participant, starting time for the CR Inspection, etc.
     6. Utilize the approved CSEP documentation checklist included in the ComplianceWISE software. Confirm that every item on the checklist has been considered by either clicking “OK”, creating a “Finding” or a “Recommendation”. Verify that the SWMP written narrative contains all elements identified in the checklist.
     7. Verify that the USMS BMP Logs and Pollution Source Logs are all completed consistent with the site map and the field assessment. Confirm that the logs provide adequate descriptions and schematic details of all BMPs that are being used, or are planned to be used, and that every active or anticipated pollution source is adequately described.
     8. Photograph any documentation that is not complete or that does not meet regulatory requirements. Use sticky-notes or other labels to highlight and briefly explain areas of non-compliant documentation and to provide information for immediate corrective action by the participant before the official report is sent. If documentation is completely missing, photograph a placeholder such as a sticky-note with a brief description of the missing element written on it. Always take photographs that show enough information, such as page numbers, so that Participants can locate the finding when viewing the report.
     9. When the SWMP and permit documentation review is complete, the CR will proceed with the review of sediment and erosion controls in the field.
   1. **On-Site Field Compliance Review**
      1. With the copy of the Participant’s Site Map(s) in hand, the CR will always start the field inspection at the main construction entry for the project and work around the entire project boundary. The CR will photographically record all suspected findings of missing or failing perimeter controls or controls at the project outfalls. The condition of main outfalls and receiving waters or watercourses will be given extra attention. The CR will work around the perimeter until they return to the main entry.
      2. Simultaneously, the CR must verify that the Participant’s site map is a complete and accurate depiction of current conditions in the field. As such, the location of every active pollution source and of every stormwater control device (aka BMP) in use **must** be visually verified. **Failure to do so will alter the Participant’s score, may invalidate the report and could result in Board disciplinary action.**
      3. Findings and recommendations discovered in the field should be tied to associated pollution sources or stormwater controls documented on the CSEP site map whenever possible. Findings related to administrative BMPs such as trash cleanup, spill cleanup, etc. will not be associated with specific BMP or pollution sources but still must be accurately located on the site map.
      4. When any discrepancy such as a missing BMP, pollution source, map update, etc., exists, the CR should create a BMP or pollution source icon on the map and then choose the failure point and category from the selection in the digital software. A finding will automatically be created.
      5. Photographs should be taken with a field of view large enough for Participants to easily identify the location of the findings when reviewing the report.
      6. Once the entire perimeter of the site has been reviewed, the CR should move closer to the interior of the project near to the main entry and continue with the inspection in a counterclockwise fashion. Interior controls and pollution sources should be verified against the Participant’s SWMP site map and updated on the CSEP digital site map. When every pollution source and stormwater control (BMP) has been inspected, and findings and recommendations photographically documented, the field inspection is complete. Upon completion of the field inspection the CR returns to the construction office to finalize the collection of compliance data.
      7. The CR should perform a final comparison of the digital site map just created with those that are noted on the Participant’s USMS Master Site Map or USMS Working Copy Site Map. The Participant’s site maps should match the field conditions. Where discrepancies exist a finding should be photographically documented, if appropriate.
   2. **On-site Inspection Finalization**
      1. The CR reviews the preliminary inspection findings with the Participant’s Qualified Person with special emphasis on any severe findings (E-Impact over 2) that should receive immediate attention.
      2. Based on the entire body of information gathered during the inspection, the CR **must** fill out the USMS Implementation 12 question checklist included within the ComplianceWISE software.
      3. Upon completion of the initial monthly inspection the CR will compile the inspection results into the digital reporting form on the CSEP website database. The CR is encouraged to perform an internal quality assurance check on the report using a separate inspector prior to issuing the report.
      4. An email notice will be sent to the Qualified Person, and to anyone else that the Participant’s home office designates**, usually within 24 hours** **of inspection completion**, notifying them that the inspection report is available for review on the CSEP website. **It is the responsibility of the CSEP Participant to coordinate the delivery of inspection reports to the Qualified Person if Internet access is not available at the jobsite.**
      5. Participants will have access to the follow-up, or “Correction Response”, portion of the CSEP database and have the ability to enter corrective action photos for their project beginning immediately after they receive notice of the inspection report being performed.
      6. Corrective Action documentation can be entered for open findings anytime before the next CR inspection or within 28 days, whichever is earlier. Participants may also make arrangements with their CR to perform documentation entry of corrective responses anytime before the next CR monthly inspection. Time is of the essence, however, for Participants striving to achieve CSEP award levels because their performance level will be weighted heavily on correction responsiveness.
      7. Participants are solely responsible to enter their digital time and date-stamped corrective response photos into the database in the designated area that corresponds to the CR’s original finding photos. Participant correction photos must match the initial CR photo in a manner that clearly documents the full correction of the finding and is adequate for an “online” CR evaluation. Findings will remain open and corrective action time will continue to run until the CR has adequate information to designate a “Closed” or “Addressed” status in the CSEP database.
      8. CRs will be notified automatically via email whenever Participant responses have been entered for CR review. CRs can also utilize the “Dashboard” on the CSEP database directly to access finding responses that require review.
      9. When responses are designated by the CR as “Closed” or “Addressed”, the CSEP database will calculate the Participant’s corrective action response time. Rejected responses will resume the response time clock as if no correction was attempted; e.g., calculating from the present time back to the time the finding was initially discovered by the CR. The response process may be repeated any number of times until the corrective action is shown as “Closed” or “Addressed” by the CR, or until another monthly inspection is performed by the CR or until 28 days have passed, whichever occurs first.
      10. Open or unaddressed findings will continue to be tracked until resolved. Open findings that go beyond 28 days without being labeled “Closed” or “Addressed” by the CR will automatically transfer to the next CR monthly report as “Carry-Over Findings”. The correction time for carry-over findings will re-start at zero at the time of the start of the next CR monthly inspection. Therefore, the maximum finding correction time for the purpose of “monthly” CSEP performance scoring is 28 days, but the total length of time for a finding to be closed can still be traced and calculated back to its origination date and time.
2. **Executive CSEP Database Usage and Performance Summary Data**
   1. The CSEP database will compile and score on an ongoing basis the compliance status and CSEP award level status of each project for each Participant based on the attached scoring criteria and performance measurements approved by the Board. (See separate CSEP Scoring Policy)
   2. When Participants view the CSEP database performance standings they can see a summary of how they rank with respect to the other unnamed participants in the program, but cannot view any other Participant’s detailed compliance information.
   3. Based on the compliance status of individual findings, performance scores will be calculated on an ongoing, real-time basis. Participant performance will be evaluated on, among other criteria, the average time that findings remain open. CRs should stress to the Participants the importance of a prompt response to correct findings.
   4. Company Executives agreed to review on at least a monthly basis the CSEP performance summary reports for their company as a “Basic” CSEP participation requirement when they signed up for the program. Accordingly, one individual per CSEP Participant was given “Executive” level permissions in the ComplianceWISE database. For those individuals assigned Executive permission a check box appears next to the performance scores for each project that must be checked off every month to indicate that they have fulfilled their Executive participation requirement. If this is ever overlooked, the database will send the Executive email reminder notices, including convenient links to the performance reports, so that the monthly review can be accomplished.