



LUCAS

GENERAL CONTRACTING CORP.

Stormwater Pollution Prevention On Lucas General Contracting Corp. Jobsites



A Compliance Guide for Subcontractors, Vendors and Suppliers

Purpose of This Guide

This guide was developed to educate Lucas General Contracting Corp.'s Subcontractors, Vendors & Suppliers regarding requirements for stormwater pollution prevention compliance. This includes:

- Specific requirements assigned to Subcontractors
- Specific actions all Subcontractors must take to comply
- To understand what to do if you observe a condition requiring attention.
- To educate Lucas General Contracting Corp.'s Subcontractors, Vendors & Suppliers as to the consequences of site non-compliance.

How Subcontractors, Suppliers and Vendors Should Use This Guide

- All Subcontractors, Vendors & Supplier actions are noted in [blue font](#).
- [Review Guide](#) and refer to your [Site Stormwater Compliance Representative\(s\)](#) if further clarification is needed.
- This Guide can be used to train required designees from your company who have the authority to oversee, instruct and direct employees and sub-contractors working at a Lucas General Contracting Corp. site in regard to stormwater compliance.

Why are we here today?

The Environmental Protection Agency (EPA) has developed a permitting program entitled the National Pollutant Discharge Elimination System (NPDES) to regulate stormwater discharge that we, Lucas General Contracting Corp. and you as our Subcontractor, Vendor or Supplier must comply with. Permits are required for all sites over 1 acre or lots that are within part of a common development. This covers every project that we build.

The EPA is currently focusing its attention on the residential construction industry to ensure compliance. All Contractors have been affected by these increased enforcement actions.

1. Compliance to the EPA's requirements are critical to our success as a Contractor.
2. Potential fines are very large; as much as \$37,500 per violation, per day.
3. The EPA has the ability to shut down construction sites for not complying with the regulations.

Lucas General Contracting Corp. has a company-wide Stormwater Program that was created to ensure compliance with the EPA's requirements. This guide was developed to provide you with an understanding of our role and your role regarding stormwater management on our jobsites.

Lucas General Contracting Corp.'s Stormwater Program

Subcontractors, Vendors and Suppliers Compliance Expectations

Who Should You Contact for Stormwater Inquiries?

1. Every Lucas General Contracting Corp. construction site has a Site Stormwater Compliance Representative(s) and QSP (Qualified SWPP Practitioner) who are responsible for continuous compliance with all permits and with the Lucas General Contracting Corp. Stormwater Program.
2. All Lucas General Contracting Corp. sites will have a visible sign posted on the site identifying the individual Site Stormwater Compliance Representative(s) for the site.
3. As a Subcontractor, Vendor or Supplier, it is your responsibility to know who the Site Stormwater Compliance Rep(s) are for every Lucas General Contracting Corp site you work.
4. Each construction site is inspected for compliance with the permit on a regular basis. Any non-compliance is required to be repaired promptly.

What's a SWPPP, BMP & What Do I Need To Know About Them?

1. The permitting process requires a written Stormwater Pollution Prevention Plan (SWPPP) be developed for each site by trained QSD (Qualified SWPP Developer). The SWPPP defines how stormwater and other potential pollutants (e.g., trash, debris, etc.) will be controlled on the site to minimize entry into downstream waters per the State of California Construction General Permit.
2. The SWPPP identifies Best Management Practices, known as BMP's, for managing stormwater at the site. Silt fences, concrete washouts, rock entrances and waste containment structures are all examples of BMPs.
 - a. Silt fencing is used to control sediment leaving the site.
 - b. A concrete washout is used to contain common pollutants in concrete from entering the ground.
 - c. Rock entrances are used to minimize tracking of dirt and debris.
 - d. A waste containment structure is used to manage waste in a confined area and facilitate removal from the site.
3. If a BMP has been modified or moved by you as a Subcontractor, Vendor or Supplier, it must be replaced **immediately**.
4. If damage to a BMP is unavoidable for completing work (pouring a foundation, delivering lumber, etc.), the Site Stormwater Compliance Rep(s) must be notified **before** damaging BMP's so they can determine whether or not to proceed with the activity at that time, and or, schedule repairs to be completed by a BMP contractor.
5. All Lucas General Contracting Corp. sites will have a visible sign posted on the site identifying the location of the SWPPP.
6. All Lucas General Contracting Corp. sites will have a copy of the SWPPP available at the jobsite construction trailer or other designated location.

7. As Subcontractor, Supplier or Vendor, it is your responsibility to review the SWPPP with the Site Stormwater Compliance Rep(s) and comply with all of the SWPPP's requirements.
8. Subcontractors, Suppliers or Vendors shall report any pollution controls that are in need of repair or not functioning properly to the Site Stormwater Compliance Rep(s).

Are There Any Other Off-Site Compliance Requirements?

1. As Subcontractor, Supplier or Vendor, **you are required** to designate a representative who has the authority to oversee, instruct and direct employees and sub-contractors working at the site when it comes to stormwater compliance.
2. As Subcontractor, Supplier or Vendor, **it is your responsibility** to provide your company's designated representative(s) with a copy of this Training Guide.
3. Consequences to Subcontractors, Suppliers or Vendors of not complying with the SWPPP requirements and the items outlined in is Training Guide may include fines, stop work orders and/or termination.

Subcontractor, Supplier or Vendor Do's and Don'ts

Below are a few Subcontractor, Supplier or Vendor Do's and Don'ts that highlight important points.

DO:

1. **DO** go to the Site Stormwater Compliance Rep(s) with any questions regarding stormwater pollution prevention or the Do's and Don'ts list.
2. **DO** properly handle, store, cover and contain all materials.
3. **DO** place all trash and debris in the receptacles provided.
4. **DO** use designated washout receptacle for (and only for) cleaning equipment (i.e. concrete trucks must use the designated concrete washout receptacles).
5. **DO** immediately report any spills of any quantity of petroleum or other chemicals to the Site Stormwater Compliance Rep(s). The Site Stormwater Compliance Rep(s) will determine the necessary actions based on the quantity of the spill and the type of chemical.

6. **DO** immediately comply with any instructions given by the Site Stormwater Compliance Rep(s) or other Lucas General Contracting Corp. personnel.
7. **DO** replace / re-install any BMPs altered by you immediately. Do not leave the site until complete.

DO NOT:

1. **DO NOT** track dirt onto streets. Use provided tracking controls and sweep or remove excess dirt from streets.
2. **DO NOT** allow any solvents, chemicals, paint, drywall finishing materials, any masonry materials, stucco materials or rinse liquids to drain into a street or storm drain, a creek, waterway, or other water body.
 - o The above mentioned materials may not be washed out on site.
3. **DO NOT** disable, damage or interfere with any silt fence or similar erosion control.
 - o For example, **DO NOT** run over a silt fence, straw wattle or forget to replace any silt fence or straw wattle you temporarily relocate, damage or dislodge.
4. **DO NOT** disable, damage or interfere with any inlet controls.
 - o For example, **DO NOT** remove inlet controls (unless an action is needed to prevent flooding) or place dirt or debris in or adjacent to inlet controls.
5. **DO NOT** disable, damage, evade or interfere with any stormwater pollution prevention controls at construction entrances.
 - o For example, **DO NOT** drive around stone construction entrances.
6. **DO NOT** disable, damage, drive over or interfere with any geotextile, matting or mulch.
7. **DO NOT** disable, damage or interfere with any other stormwater pollution prevention controls.

Remember: The failure to comply with stormwater requirements at any Lucas General Contracting Corp. site is a breach of your contractual obligations and may result in economic sanctions or termination.

Good Housekeeping Practices

Construction related waste can end up polluting stormwater runoff if not properly managed. There are eight key areas to good housekeeping practices:

1. Waste Management
2. Concrete Washout
3. Material Storage
4. Equipment and Vehicle Fueling
5. Spill Prevention and Response Plan
6. Tracking
7. Stabilization
8. Dewatering

1. Waste Management



GOOD:

- Container placed off road
- Trash is not overflowing
- Tracking pad in front of container

POOR:

- Area around container should be clean
- Tracking pad might need refreshing

What does this mean to me?

- Make sure to put trash in the container.
- If containers are full, please report to the Site Stormwater Compliance Rep(s).
- Remove left over materials from the site promptly.
- Portable toilets? These are common on job sites and are often noted as violations for not being staked down, too close to roads or overturned.

2. Concrete Washout Areas



Look for signage at designated area.

Concrete wash materials and water are highly polluted and may not be discharged onto the ground or into uncontained areas.

What does this mean to me?

- Do not washout concrete trucks or equipment outside designated washout areas.
- Entrances to washout areas should be maintained to prevent tracking into streets or alleys. Any entrances to washout areas that are not functioning as intended should be reported to the Site Stormwater Compliance Rep(s) **immediately**.
- Grout and stucco shall also be disposed of in the designated washout area.
- When using washout area, inspect for leaks and tears and report to the Site Stormwater Compliance Rep(s) and **do not use** until repaired.
- Hardened concrete shall be removed from the site and never disposed of in the concrete washout area.

3. Material Storage

Good material management is essential to prevent stormwater pollution.

What does this mean to me?

- Consult with your Site Stormwater Compliance Rep(s) to determine proper storage area locations and storage techniques.
- Building materials should not be stored in the road.
- Verify with the Site Stormwater Compliance Rep(s) that the materials you want to store on site are allowed to be stored onsite by the SWPPP.
- Building materials such as paint, solvents, pesticides, fuel and oils, or those materials having the potential to contaminate stormwater runoff, should be stored indoors or under cover OR should be removed from the site if appropriate storage is not available.
- Secondary containment to prevent a spill from spreading should be provided.
- Designated staging areas for fueling, mixing paints, stucco, mortar, etc. should be predetermined with the Site Stormwater Compliance Rep(s).
- Train your employees and subcontractors on the importance of pollution prevention.

4. Equipment and Vehicle Fueling (Improper Fueling Activity)



Outdoor vehicle fueling and maintenance can be a significant source of stormwater pollution.

Consider performing these activities at an offsite facility.

What does this mean to me?

- Train your employees and subcontractors in proper fueling procedures:
 - Stay with vehicles during fueling
 - Properly use pumps and shutoff valves
- **Do not** allow vehicle fueling to take place in the middle of a field or where a lot of gas can go onto the ground.
- Keep fueling in designated areas.
- Inspect fueling equipment regularly for leaks, damage and other service issues.
- Report any fuel spills to the Site Stormwater Compliance Rep(s) **immediately**.
- Containment trays must be placed below all motorized equipment during fueling operations
- Containment trays must be placed below motorized equipment during non-operational hours and when the equipment is parked to prevent oil from leaking into the soil.

5. Spill Prevention Plan



This fuel storage should have a secondary pan as a backup in the event of leakage.

Container and equipment should be inspected daily for leaks and damage.

Most state and EPA construction general permits require the preparation of a spill prevention plan and response plan.

What does this mean to me?

- Review the spill prevention plan with your Site Stormwater Compliance Rep(s).
- Know how to dispose of contaminated spill material properly (this should be outlined in the plan).
- Train your employees and subcontractors on spill prevention and required response.
- In the event that a hazardous material or chemical is released, which is in excess of reportable quantity, you must contact the National Response Center at 1-800-424-8802 for assistance and **immediately** report release to the Site Stormwater Compliance Rep(s).*

** The reportable quantity is located on MSDS sheets that are required to be available.*

6. Tracking



Subcontractors, Suppliers and Vendors are responsible for their own tracking.

One of the most common stormwater related violations is dirt in the public street. We can eliminate these violations and avoid likely enforcement actions by taking measures to retain all sediment on site.

What does this mean to me?

- Remove mud and dirt from the tires of construction vehicles before entering a paved roadway.
- Use only designated construction exits that have tracking controls.
- Sweep or remove excess dirt from streets. **Do not** wash dirt from streets.
- Notify Site Stormwater Compliance Rep(s) when entrance(s) need to be refreshed.
- Work out a plan with the Site Stormwater Compliance Rep(s) while working on a specific lot or area within a community, to prevent tracking at that location.

7. Stabilization



Keep stockpiles and materials off stabilized project areas.

Subcontractors, Suppliers and Vendors are responsible for repairing BMPs they have damaged.

For example, in this case the silt fence should have been repaired by the Trade that dumped the piles of soil.

When construction activities have temporarily or permanently ceased, we are required to stabilize exposed soils to minimize erosion.

What does this mean to me?

- Keep off project areas that have been stabilized. This includes open areas that have not begun construction yet.
- **Do not** store materials on open areas that have been stabilized unless approved by the Site Superintendent.
- Report damaged BMPs around stabilized areas to the Site Superintendent.
- Report vehicle activity on stabilized lots.

8. Dewatering

Dewatering practices typically result in muddy water being pumped out of excavations.

What does this mean to me?

- Pump muddy water from these areas to a temporary or permanent sedimentation basin or to an area completely enclosed by silt fence in a flat vegetated area where discharges can infiltrate into the ground.
- Never pump muddy discharge into storm drains, streams, lakes or wetlands.
- Some permits may have specific requirements for dewatering, you are required to follow those instructions.
- Depending on your location, dewatering may require a separate permit.
- Consult with your Site Stormwater Compliance Rep(s) **prior** to any dewatering activity.

Review of Stormwater Compliance for Subcontractors, Suppliers and Vendors

- Know the names and contact information of the Site Stormwater Compliance Rep(s).
- Subcontractors, Vendors and Suppliers are required to designate a representative who has the authority to oversee, instruct and direct employees and sub-contractors working at a Lucas General Contracting Corp. site in regard to stormwater compliance.
- If a BMP must be removed to complete a task (such as silt fence) it must be replaced upon completion of the task and no later than the end of the day.
- Report BMP abuse.
- Make every attempt to keep vehicles on the roadway and not on open areas.

- Do not store materials on paved surfaces without prior approval from the Site Superintendent.
- Know where spill kits are located and how to use them.
- Contact your Site Stormwater Compliance Rep(s) for more information or any questions.

Conclusion:

We are all responsible for stormwater pollution or polluted runoff, and it all boils down to one problem: As stormwater travels across a jobsite, it picks up sediment, trash (cigarette butts, wrappers, cups, construction waste, joint compound, concrete spillage, paint, etc.), and other pollutants such as gasoline, motor oil, hydraulic fluid, antifreeze, etc. This polluted runoff can flow directly into storm drains, rivers, lakes and streams.

It is up to all of us, Lucas General Contracting Corp. Associates, Subcontractors, Suppliers, Vendors, and Consultants to follow the permit, SWPPP and guidelines in this handbook. Prevention and control of stormwater on the jobsite is not only required by law, it is the correct thing to do for the environment. Continual education in managing stormwater is a primary factor in the success of preventing stormwater pollution as well as using common sense while working on our sites.

Only by working as a team can we truly prevent pollution from leaving our sites.

Thank you for your participation in managing stormwater at Lucas General Contracting Corp. communities.