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*EPA recommends the City re-evaluate the staffing needs for its private construction site inspection program. It appeared as though the large number of construction projects assigned to the sole private construction site inspector would impact the City's ability to conduct thorough stormwater inspections at private construction sites.*

*EPA recommends that the City conduct routine inspections of construction activities within its jurisdiction to ensure compliance with the requirement contained within its stormwater ordinance, rather than SWPPP inspections on behalf of private developers. Private developers are required to conduct their own SWPPP inspections to comply with the State's Construction General Permit.*

3.4.4 Qualifications for Stormwater Construction Site Inspectors

Section K.11.b of the Permit states, "Inspectors shall be certified by the State Water Board as a Qualified SWPPP Developer (QSD)."

The City's Private Construction Site Inspector was certified as a QSD, but the public site inspectors who conducted erosion and sediment control inspections were not certified. The Public Construction Site Inspectors' Supervisor was a certified QSD; however he did not conduct construction site inspections.

*Potential Permit Violation:*

*The City's public construction site inspectors did not have QSD certifications at the time of the inspection, as required by Section K.11(b) of the Permit.*