

# Electronic Site Inspection Guide for Operators

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## Construction Stormwater Inspections Overview

Construction stormwater inspections fall into two categories: operator site inspections and regulatory oversight inspections, each governed by different requirements.

Operator site inspections are required under Part 4 of the Utah Construction General Permit (CGP) and Part 3 of the Common Plan Permit (CPP). These require that a qualified person regularly inspects the site (typically once per week, or every 14 days and after a 0.5-inch or greater rainfall event) to ensure stormwater controls are properly installed, functioning, and maintained. These inspections are internal to the project team and are a condition of permit compliance.

In contrast, oversight inspections are conducted by the Utah Division of Water Quality (DWQ) or a regulated Municipal Separate Storm Sewer System (MS4) to evaluate whether a site is complying with its stormwater permit and developed Storm Water Pollution Prevention Plan (SWPPP). Under Utah Code § 19-5-108.3, these oversight inspections must now be conducted electronically using photographs and documentation submitted by the operator. If an operator opts out, routine on-site inspections from the DWQ will continue.

## Areas of the Site to Photograph

If you, the operator, opt for an electronic inspection in place of on-site inspections by DWQ, you are confirming your intent to submit all necessary documentation required for the DWQ to perform a remote electronic inspection. This includes providing geo-located, time-stamped photos of the active construction site that clearly captures:

1. Site signage showing the UPDES permit tracking number, contact person's name, phone number and email address, and how to obtain a copy of the SWPPP.
2. All cleared, graded, or excavated areas that have not yet achieved final stabilization, as required by CGP Part 2.2.14 or CPP Part 2.6;
3. All storm water controls, including erosion, sediment, and pollution prevention BMPs installed per specifications to comply with the CGP or CPP;
4. All material, waste, borrow, and equipment storage and maintenance areas covered under your storm water permit;
5. All areas where storm water typically flows within the site, including natural or constructed drainage features used to divert, convey, or treat runoff;
6. All discharge points (outfalls) from the construction site; and
7. All areas where you have implemented stabilization measures, but final stabilization has not been completed.

## Photograph Quality and Considerations

Photographs must be of sufficient resolution, clarity, and scope to allow the regulatory authority to assess compliance with Permit requirements. For best results, submit photos in their original format, ensuring they clearly capture site conditions and all areas where BMPs are installed. Images should offer full, clear views that accurately represent the extent and effectiveness of BMP installation and overall site conditions.

## Submission Deadline

This documentation must be submitted **within the first 7 calendar days of each month** following the first full month of active construction under permit coverage, and continue submitting inspections monthly thereafter. For example, if your permit coverage begins on March 15, your first full month of coverage is April. You must submit your first electronic inspection by May 7.

Failure to provide complete or clear documentation may result in a request to submit additional documentation or a decision by DWQ to conduct an on-site inspection.

## Procedures for Conducting Electronic Site Inspections

It is essential that all sediment, erosion, and pollution prevention controls are installed in accordance with:

1. The locations shown on the site map; and
2. The materials and installation methods specified for each BMP in the SWPPP.

To support a complete and accurate oversight inspection, operators should provide photos that clearly show all key site conditions and stormwater controls. These photos must demonstrate compliance with the CGP or CPP. Follow this guide to ensure your photos meet inspection standards and reflect current site conditions:

### 1. Permit Signage

Start with a photo of the site's stormwater permit sign, ensuring it includes all information required under CGP Part 1.5 (or CPP 1.9). The sign should be visibly posted in a safe and publicly accessible location near the primary site entrance. Ensure the photo clearly captures both the content of the sign and its placement.

### 2. Stormwater Controls (BMPs)

Provide clear, geo-located photos of all BMPs. Capture multiple angles as needed to show proper installation and functionality. For follow-up inspections, repeat photos from the same locations to show progress and maintenance.

Include photos of the following:

- Unstabilized areas:
  - Cleared, graded, or excavated areas that have not yet reached final stabilization
  - Areas where interim stabilization measures are in place (e.g., mulch, seed, erosion control blankets)
- Erosion and sediment controls:
  - Wattles, silt fence, check dams, slope protection, sediment basins
  - Show perimeter controls every ~200–400 feet and especially at low points where runoff collects and/or leaves the project site
- Pollution prevention controls:
  - Spill kits, covered chemical storage, concrete/stucco washout stations, covered dumpsters, portable toilets (from multiple sides and with any tie-downs visible)
  - Fueling areas (show hoses, secondary containment, and/or berms)
- Stormwater flow paths and drainage features:
  - Natural or constructed swales, ditches, and curbs
  - Linear drainage features (e.g., curb lines) every ~400 feet

- Inlet protection:
  - Close-up of inlet protection devices and the area directly upstream
- Discharge points (outfalls):
  - Include views of erosion, sediment deposits, and any signs of discharge (e.g., color changes, oil sheen, solids)
- Exit/Track-out controls:
  - View of the full exit point from 90 degrees, showing effectiveness of stabilized construction entrance
- Staging and storage areas:
  - Show equipment/vehicle parking and material/waste storage (e.g., for concrete, asphalt, topsoil, gravel)
- Vehicles and equipment:
  - Document any leaks or signs of fluid drips, especially near maintenance areas

### 3. Photo Quality & Placement

- Photos must be clear, well-lit, and unaltered
- Match photo locations to those on the site map
- Provide context where needed (e.g., zoomed out to show surroundings, close-ups for key features)
- Label photos clearly when submitting (e.g., “North Silt Fence – SE Corner,” “Concrete Washout – West Side”)

### Justification for Conducting an Onsite Inspection

Pursuant to Utah Code § 19-5-108.3, DWQ or a municipal system authority may conduct an on-site oversight inspection if there is a documented justification, which may include:

1. The operator opted out of electronic inspections or requested an on-site inspection per Utah Code § 19-5-108.3(11)(c).
2. Submitted documentation is insufficient, electronic photos have been altered, an electronic site inspection was not submitted at the appropriate time, or the construction site is within one-half mile of a river, a stream, or a lake per Utah Code § 19-5-108.3(12).
3. An immediate or imminent threat to water quality exists. Per Utah Code § 19-5-108.3 (7)(f) *“The authority may issue an order to stop construction if the authority has a clearly documented reason articulating an immediate threat to water quality”*. Also, per (7)(g) *“The authority may recoup the reasonable costs incurred to correct a specific violation the applicant refuses to correct after the enforcement described in this Subsection (7) has been exhausted if the authority, at the time of clean up, determine there is an imminent threat of significant harm to water quality or the storm water system.”* The oversight authority would likely need to visit the site to determine and document that either of the conditions in Utah Code § 19-5-108.3(7)(f) or (g) are met.

Additionally, an onsite inspection may be required following an illicit discharge or a verified complaint because MS4s are required to investigate all illicit discharges per [MS4 Permit](#) Part 4.2.3. and respond to complaints per Part 4.2.4.4.4.. Unless there is an imminent threat of a discharge, 48-hours advance notice of on-site inspection must be provided by the MS4.

### Additional Documentation

Additionally, permitted sites must maintain an up-to-date SWPPP throughout the duration of the project and ensure it is accessible to DWQ inspectors during an oversight inspection. The SWPPP must include all required elements as outlined in CGP Part 7.3 or CPP Part 4.2, including site map(s), inspection reports, corrective action logs, a copy of the NOI, and other relevant documentation.

### **How to Submit**

If you are opting in to electronic site inspections, please compile all required photographs into a single compressed archive file (e.g., \*.zip) and submit it through DWQ's Electronic Document Submission Portal [[Link](#)] within the timeframe specified above.

For any questions and further assistance with submitting an electronic site inspection please contact the DWQ at [WQInfoData@utah.gov](mailto:WQInfoData@utah.gov) or at (801) 536-4300.