5.0 CONSTRUCTION COMPONENT

5.1 INTRODUCTION

Section 5.0 of this SWMP addresses the requirements in Municipal Permit Sections D.2.a.(1), D.2.a.(2)(a), D.2.b, D.2.c.(1) through (4), D.2.d-f; I.1, J.1.a.(3)(d)i, J.1.a.(3)(d)iii through J.1.a.(3)(d)xiv, and J.1.a.(3)(l) that the Authority has determined are relevant to the Construction Component.

Municipal Permit Section D.2.a.(1) requires that the Authority review and update its grading ordinances and other ordinances as necessary to achieve full compliance with the Municipal Permit, including requirements for the implementation of all designated BMPs and other measures. Section 5.3 has been prepared to address this requirement.

Municipal Permit Section D.2.a.(2)(a) requires that the Authority implement designated BMPs and other measures at all individual proposed construction sites, so that pollutants discharged from the site will be reduced to the MEP and will not cause or contribute to a violation of water quality standards. Section 5.2 has been prepared to address this requirement.

Municipal Permit Section D.2.b requires that the Authority maintain and update, on a monthly basis, a watershed-based inventory of all construction sites within its jurisdiction. The use of an automated database system, such as Geographical Information System (GIS) is recommended. Sections 5.2, 5.2.1, and 5.2.2 have been prepared to address this requirement.

Municipal Permit Section D.2.c.(1) requires that the Authority designate a minimum set of BMPs and other measures to be implemented at construction sites. The designated minimum set of BMPs shall include general site management and erosion and sediment controls. Sections 5.4 and 5.5 have been prepared to address this requirement.

Municipal Permit Section D.2.c.(1)(a)vi requires that the Authority develop limitations of grading to a maximum disturbed area before either temporary or permanent erosion controls are implemented to prevent stormwater pollution. The Authority has the option of temporarily increasing the size of disturbed soil areas by a set amount beyond the maximum, if the individual site is in compliance with applicable stormwater regulations and the site has adequate control practices implemented to prevent stormwater pollution. Section 5.4.1 has been prepared to address this requirement.

Municipal Permit Section D.2.c.(2) requires that the Authority require implementation of advanced treatment for sediment at construction sites that are determined by the Authority to be an exceptional threat to water quality. Soil erosion potential or soil type, site's slopes, project size and type, sensitivity of receiving water bodies, proximity to receiving water bodies, non-stormwater discharges, ineffectiveness of other BMPs, and any other relevant factors shall be considered by the Authority in evaluating the threat to water quality. Section 5.4 has been prepared to address this requirement.

Municipal Permit Section D.2.c.(3) requires that the Authority implement or require the implementation of the designated minimum BMPs and any additional measures necessary to comply with the Municipal Permit at each construction site within its jurisdiction year round. BMP implementation requirements can vary based on wet and dry seasons. Dry season BMP implementation must plan for and address rain events that may occur during the dry season. Sections 5.4.1 and 5.5 have been prepared to address this requirement.

Municipal Permit Section D.2.c.(4) requires that the Authority implement or require implementation of additional controls for construction sites tributary to CWA section 303(d) water body segments impaired for sediment and additional controls for construction sites within or adjacent to or discharging directly to coastal lagoons or other receiving waters within environmentally sensitive areas (as defined in Attachment C of the Municipal Permit). Section 5.4.2 has been prepared to address this requirement.

Municipal Permit Section D.2.d requires that the Authority conduct construction site inspections for compliance with its local ordinances (grading, stormwater, etc.), permits (construction, grading, etc.), and the Municipal Permit. Section 5.5 has been prepared to address this requirement.

Municipal Permit Section D.2.e requires that the Authority develop and implement an escalating enforcement process that achieves prompt corrective actions at construction sites for violations of the Authority's water quality protection permit requirements and ordinances. This enforcement process shall include authorizing the Authority's construction site inspectors to take immediate enforcement actions when appropriate and necessary. The enforcement process shall include appropriate sanctions such as stop work orders, non-monetary penalties, fines, bonding requirements, and/or permit denials for non-compliance. Section 5.5 has been prepared to address this requirement.

Municipal Permit Section D.2.f requires that the Authority, in addition to the notification requirements in section 5(e) of Attachment B, shall notify the Regional Board when the Authority issues a stop work order or other high level enforcement to a construction site in their jurisdiction as a result of stormwater violations. Section 5.5 has been prepared to address this requirement.

Municipal Permit Section I.1 requires that the Authority annually assess and report the effectiveness of the Construction component of their SWMP addressing significant and/or types of activities/BMPs being implemented. Based on the results of the effectiveness assessment, the Authority is required to annually review its jurisdictional activities or BMPs to identify modifications and improvements needed to maximize SWMP effectiveness as they pertain to the Construction component. Sections 5.6 and 13.0 have been prepared to address this requirement.

Municipal Permit Sections J.1.a.(3)(d)I and J.1.a.(3)(d)iii through J.1.a.(3)(d)xiv require that the Authority's Construction component of the SWMP be revised to include:

1 Updated grading and other applicable ordinances. Section 5.3 has been prepared to address this requirement.

2 Updated construction and grading project requirements. Section 5.4.1 has been prepared to address this requirement.

3 A completed watershed-based inventory of all construction sites. Section 5.2.1 has been prepared to address this requirement.

4 A description of steps that will be taken to maintain and update monthly a watershed-based inventory of all construction sites.

5 A list and description of the minimum BMPs that will be implemented, or will be required to be implemented, including pollution prevention. Section 5.4.1 has been prepared to address this requirement.

6 A description of the maximum disturbed area allowed for grading before either temporary or permanent erosion controls are implemented. Section 5.4.3 has been prepared to address this requirement.

7 A description of construction site conditions where advanced treatment will be required. Section 5.4.4 has been prepared to address this requirement.

8 A description of the steps that will be taken to require and verify the implementation of the designated BMPs at all construction sites. Section 5.5 has been prepared to address this requirement.

9 A description of planned inspection frequencies. Section 5.5 has been prepared to address this requirement.

10 A description of inspection procedures. Section 5.5 has been prepared to address this requirement.

11 A description of steps that will be taken to track construction site inspections to verify that all construction sites are inspected at the minimum frequencies required. Section 5.5 has been prepared to address this requirement.

12 A description of available enforcement mechanisms, under what conditions each will be used, and how they will escalate. Section 5.5 has been prepared to address this requirement.

13 A description of notification procedures for non-compliant sites. Section 5.5 has been prepared to address this requirement.

Municipal Permit Sections J.1.a.(3)(l) describe the required updates and revisions to the SWMP as they pertain to the Effectiveness Assessment Component. Section 13.0 describes the Effectiveness Assessment component of the SWMP. These requirements also are addressed in Sections 5.5 and 13.0.

5.2 SOURCE CHARACTERIZATION

The Construction component will address the following activities: demolition, grading, excavation, clearing, and structure and road construction that can result in the disturbance of soil and/or the production of materials that can result in the transport of trash, debris, or sediment to the stormwater conveyance system. Sources identified by the Authority include any existing or future developments or construction sites at SAN. Designated Construction BMPs will be implemented at all construction sites to reduce the discharge of trash, debris, and/or sediment from the site to the MEP and not cause or contribute to a violation of water quality standards.

5.2.1 SITE INVENTORY

The Authority Environmental Affairs Department maintains a monthly watershed-based inventory of active construction projects at SAN. All construction projects at SAN lie in the same watershed, specifically, the Pueblo San Diego hydrologic unit, San Diego Mesa hydrologic area, Lindbergh hydrologic sub-area (908.21). The list of active construction sites is presented in Table 3.

5.2.2 INVENTORY UPDATES

The inventory is updated by the Environmental Affairs Department during the first week of each month. Up-to-date information is obtained from the Authority Facilities Development Department which grants final project approvals and provides daily oversight/inspection of all construction activity underway at SAN.

5.3 ORDINANCE UPDATES

The Authority has not adopted a grading ordinance. The absence of a grading ordinance is largely due to the following:

1. Mass grading activities are generally not expected to be necessary with most construction activities in the Authority's jurisdiction because SAN is naturally relatively flat and, thus, most sites are ready for buildings.

2. Grading ordinances are generally adopted by municipalities in order to regulate activities on private property, and as previously noted, there is no private property in the Authority's jurisdiction; the Authority holds a master lease for the land with the Port of San Diego.

The approval of a development or improvement project carried out by the Authority itself includes the self-imposition of environmental mitigation measures that are necessary to any impacts. Such mitigation measures become part of the project design and / or implementation. The approval of a tenant project becomes part of the lease or part of a use and occupancy permit. Any mitigation measures required by the environmental review process become part of the lease or use permit. These mitigation measures would address the type of impacts that a grading ordinance would address. Thus, the Authority imposes by design and implementation or by lease or by permit the same types of controls on site preparation that a grading ordinance would seek to impose.

5.4 BEST MANAGEMENT PRACTICE REQUIREMENTS

5.4.1 UPDATED BMP REQUIREMENTS

This section provides a designation of the minimum BMPs for construction activities at the SAN. All construction sites must be protected to prevent discharges to the MEP. The minimum BMP requirements are the same for each construction project regardless of the project's threat to water quality. Each construction site must be protected by an effective combination of erosion and sediment controls, materials and waste management controls, and site management controls. The effectiveness of each in preventing or reducing stormwater pollution associated with construction activities is dependent upon the proper implementation and maintenance of these BMPs.

The following BMPs are required for all construction sites year-round, depending on their applicability to the activity at hand.

General Site Management BMPs:

- Pollution prevention where appropriate;
- Development and implementation of a Construction Site SWPPP;
- Maintenance of all BMPs, until removed;
- Retention, reduction, and proper management of all pollutant discharges on site to the MEP standard;
- Use of smaller quantities of toxic materials or substitution of less-toxic materials, where feasible;
- Modification of practices to reduce waste;
- Decrease process wastewater flows;
- Cleaning up without water whenever possible;

- Minimizing the volume of cleaning water to decrease wastewater;
- Minimizing outside storage areas;
- Development of a schedule of preventive maintenance for equipment;
- Recycling of wastes on-site or off-site;
- Segregation of wastes;
- Keeping liquid wastes out of dumpsters or trash containers;
- Keeping any hazardous or harmful wastes out of dumpsters or trash containers;
- Keeping waste containers covered;
- Requesting that leaking dumpster or trash cans be fixed or replaced;
- Disposal of wastes properly and on a frequent and regular basis;
- Having rags handy for cleanup;
- Keeping absorbents on hand to help clean up spills;
- Implementing spill response procedures;
- Training employees in pollution prevention.

Depending on the specific activities being conducted at a construction site, the Authority requires the use of BMPs designed to control those particular activities. These BMPs are described below in general terms. BMPs must be employed to the industry standards as listed in the California BMP Handbook for Construction Activity (2003), produced by the California Stormwater Quality Association and available at http://www.cabmphandbooks.com or in the Caltrans Construction Site BMP Manual available at http://www.dot.ca.gov/hq/construc/stormwater/manuals.htm. Those BMPs, as listed in the California BMP Handbook for Construction Activity or in the Caltrans Construction Site BMP Manual, include

Non-Stormwater Management BMPs

NS-1 Water Conservation Practices

NS-2 Dewatering Operations

NS-3 Paving and Grinding Operations

NS-4 Temporary Stream Crossing

NS-5 Clear Water Diversion

NS-6 Illicit Connection / Discharge

NS-7 Potable Water / Irrigation

NS-8 Vehicle and Equipment Cleaning

NS-9 Vehicle and Equipment Fueling

NS-10 Vehicle and Equipment Maintenance

NS-11 Pile Driving Operations

NS-12 Concrete Curing

NS-13 Concrete Finishing

NS-14 Material and Equipment Use

NS-15 Demolition Adjacent to Water

NS-16 Temporary Batch Plants

Waste Management & Materials Pollution Control BMPs

WM-1 Material Delivery and Storage

WM-2 Material Use

WM-3 Stockpile Management

WM-4 Spill Prevention and Control

WM-5 Solid Waste Management

WM-6 Hazardous Waste Management

WM-7 Contaminated Soil Management

WM-8 Concrete Waste Management

WM-9 Sanitary / Septic Waste Management

WM-10 Liquid Waste Management

Erosion and Sediment Control BMPs

- Minimization of areas that are cleared and graded to only the portion of the site that is necessary for construction;
- Minimization of exposure time of disturbed soil areas;
- Minimization of grading during the wet season and correlation of grading with seasonal dry weather periods to the extent feasible;

- Limitation of grading to a maximum disturbed area of 1 acre, as determined by the Authority, before either temporary or permanent erosion controls are implemented to prevent stormwater pollution; the Authority has the option of temporarily increasing the size of disturbed soil areas by a set amount beyond the maximum, if the individual site is in compliance with applicable stormwater regulations and the site has adequate control practices implemented to prevent stormwater pollution;

- Temporary stabilization and reseeding of disturbed soil areas as rapidly as feasible;

- Preservation of natural hydrologic features where feasible;

- Preservation of riparian buffers and corridors where feasible;

- Erosion prevention, to be used as the most important measure for keeping sediment on site during construction, but never as the single method;

- Sediment controls, to be used as a supplement to erosion prevention for keeping sediment on-site during construction;

- Slope stabilization on all inactive slopes during the rainy season and during rain events in the dry season;

- Slope stabilization on all active slopes during rain events regardless of the season;

- Permanent re-vegetation or landscaping as early as feasible.

Again, depending on the specific activities being conducted at a construction site, the Authority requires the use of BMPs designed to control those particular activities. These BMPs are described below in general terms. The BMPs, as listed in the California BMP Handbook for Construction Activity (as cited above) or in the Caltrans Construction Site BMP Manual, include:

Erosion Control BMPs

EC-1 Scheduling

EC-2 Preservation of Existing Vegetation

EC-3 Hydraulic Mulch

EC-4 Hydroseeding

EC-5 Soil Binders

EC-6 Straw Mulch

EC-7 Geotextiles & Mats

EC-8 Wood Mulching

EC-9 Earth Dikes and Drainage Swales

EC-10 Velocity Dissipation Devices

EC-11 Slope Drains

EC-12 Streambank Stabilization

EC-13 Polyacrylamide

Temporary Sediment Control BMPs

SE-1 Silt Fence

SE-2 Sediment Basin

SE-3 Sediment Trap

SE-4 Check Dam

SE-5 Fiber Rolls

SE-6 Gravel Bag Berm

SE-7 Street Sweeping and Vacuuming

SE-8 Sandbag Barrier

SE-9 Straw Bale Barrier

SE-10 Storm Drain Inlet Protection

Wind Erosion Control BMPs

WE-1 Wind Erosion Control

Temporary Tracking Control BMPs

TC-1 Stabilized Construction Entrance / Exit

TC-2 Stabilized Construction Roadway

TC-3 Entrance / Outlet Tire Wash

5.4.2 ADDITIONAL CONTROLS FOR CONSTRUCTION SITES

Construction sites will be categorized as posing either a high, medium, or low threat to water quality. Soil erosion potential, site slope, project size and type, sensitivity of receiving water bodies, proximity to receiving water bodies, non-stormwater discharges, past record of non-compliance by the contractor / operator at the construction site, and any other relevant factors will be considered in evaluating the threat to water quality posed by construction sites. Project size and type, sensitivity of receiving water bodies, and proximity to receiving water bodies are generally the most significant for projects at the SAN.

In accordance with Municipal Permit Section D.2.c.(2), the Authority requires implementation of advanced treatment for sediment at construction sites that are determined by the Authority to be an exceptional threat to water quality. Soil erosion potential or soil type, site's slopes, project size and type, sensitivity of receiving water bodies, proximity to receiving water bodies, non-stormwater discharges, ineffectiveness of other BMPs, and any other relevant factors shall be considered by the Authority in evaluating the threat to water quality and determining the need for advanced treatment. The Authority may require the implementation of multiple BMPs as described in Section 5.4.1 to provide "multiple lines of defense" for high priority construction sites.

In evaluating Municipal Permit Section D.2.c.(4), the Authority has determined that this particular Permit Section is not applicable to the Authority's jurisdiction for 2 reasons, namely: 1) runoff from the airport drains into San Diego Bay, which is not listed as a CWA 303(d) water body segment impaired for sediment; and 2) runoff from the airport does not drain directly into San Diego Bay, but rather is commingled with runoff from other areas.

5.5 PROGRAM IMPLEMENTATION

This section includes a description of the steps that will be taken to require and verify the implementation of the designated BMPs at all construction sites. The detailed content and organization of this section reflects the specific processes used by the Authority, and is further sub-divided as needed (private and public projects). Program implementation includes the following:

5.5.1 EDUCATION

The Authority's stormwater construction education efforts focus on construction activities and their relationship to urban runoff impacts on water quality. The Construction education program will utilize available guidance mechanisms, BMP information, and training programs to create the awareness of 1) pollution causing activities related to construction sites, and 2) the methods used to minimize these pollutants.

This program is designed to address the following primary objectives:

- Provide useful guidance in developing outreach and training programs that will support the successful implementation of the Authority SWMP;

- Encourage the consistent application of reasonable and effective BMPs and pollution prevention strategies by construction personnel;

- Maximize consistency in information and facilitate the adaptation of education and outreach to appropriate construction personnel, raising knowledge and awareness of the issues related to stormwater and urban runoff.

The education program includes annual training prior to the rainy season so that its construction project proponents / sponsor / managers, construction site personnel, inspection staff, and other relevant persons have, at a minimum, an understanding of the following topics, as appropriate for the target audience:

1 Basic urban runoff training for all personnel, followed when appropriate by more advanced training for targeted groups;

2 California's Statewide NPDES Permit requirements and federal, state, and local water quality regulations where applicable;

3 Federal, state, and local water quality laws and regulations applicable to construction and grading activities;

4 Water quality impacts associated with land development and control measures to address them;

5 The connection between construction activities and water quality impacts (i.e., impacts from land development and urbanization and impacts from construction material such as sediment);

6 Proper implementation of erosion and sediment control and other BMPs to minimize the impacts to receiving water quality resulting from construction activities;

7 The Authority's plan review, inspection, and enforcement policies and procedures to verify consistent application;

8 Stormwater compliance construction site inspections and self-inspections;

9 Prohibited discharges to the storm drain system and the Authority's Illicit Discharge Detection and Elimination Program;

10 Preventive maintenance;

11 Spill response, containment, and recovery.

10 Current advancements in BMP technologies;

5.5.2 TRAINING

The education program will address the training needs of all construction personnel. Using formal and informal training mechanisms, the education program will provide construction personnel with an understanding of the topics listed above and the relevance of stormwater issues and BMPs. The Authority will provide in-house training and, to the extent possible, provide or support training efforts directed at the construction industry. It is also anticipated that those business communities and trade associations related to construction activities will also train their colleagues in response to changing business practices resulting from implementation of the Authority's SWMP. In addition to the education topics listed in Section 10, the construction training agendas will address the following:

The Authority will use the following mechanisms in our education efforts. Current, continued, and planned use of these mechanisms enables the Authority to meet many of the obligations and education requirements in the Municipal Permit.

- Pre-bid, pre-construction, and on-going project progress meetings;
- On-site inspections, tailgate meetings, and site visits;
- Development and distribution of BMP guidance for certain potentially polluting construction activities;
- Classroom training and workshops;
- Community / staff meetings;
- Posters, pamphlets, and flyers;
- Educational videos;
- Authority newsletter articles;
- Tenant advisories;
- Website updates;
- Outreach to business associations;
- Participation in joint outreach efforts (for example, the THINK BLUE campaign).

Classroom training for Facilities Development Department and Environmental Affairs Department staff will be conducted at least annually. Training includes review of the SWMP Construction requirements, introduction of resources for Best Management Practice information, bid document preparation, and plan review and contract compliance requirements. Continuous training may also include in-house presentations, emails, joint field walk-inspections, new hire review, as well as attendance at training programs put on by outside agencies. When feasible, the Authority will help sponsor outreach and / or training activities other municipal, quasi-government, private construction, and development industry representatives.

5.5.3 CONSTRUCTION PROJECT APPROVAL PROCESS

Section 4.4.4 of this SWMP outlined the process for approving development or improvement projects carried out by the Authority or airport tenants. These processes lead to the identification and imposition of required construction and post-construction BMPs. In general, conditions of approval require the project sponsor / manager / contractor / tenant to prepare a SWPPP. These SWPPPs are reviewed and approved by the Environmental Affairs Department. Smaller projects may be required to implemented specific BMPs identified by the Authority, without the need for preparation or submittal of a SWPPP.

5.5.4 DIRECT IMPLEMENTATION OF BMPS

Section 5.4.1 describes the BMPs required for all construction sites, depending on their applicability to the activity at hand. Each construction site must be protected by an effective combination of erosion and sediment controls, materials and waste management controls, and site management controls. The effectiveness of each in preventing or reducing stormwater pollution associated with construction activities is dependent upon the proper implementation and maintenance of these BMPs.

5.5.5 INSPECTION OF CONSTRUCTION SITES

The Authority inspects all construction sites to monitor compliance with the Authority's ordinances, permits, approvals, and the Municipal Permit. The Authority's inspection program exceeds the minimum requirements of the Municipal Permit. All high priority construction sites will be inspected at least weekly on a year-round basis. It is also the Authority's goal to inspect medium priority sites and low priority sites (generally sites less than 1 acre in size) at least weekly on a year-round basis.

The Authority is concerned with every aspect of a construction project and has staff that is responsible for inspecting all improvements in the Authority's jurisdiction. The Authority must verify either contract compliance for Authority "public works-type" projects or lease / use permit compliance for tenant projects. The construction inspector in the Authority's Facilities Development Department is generally on-site any day there is construction activity. He is responsible for inspecting all construction activities and is trained to identify stormwater issues. He also alerts the Environmental Affairs Department to issues that cannot be corrected immediately.

The Environmental Affairs Department conducts the regular weekly inspections. The inspection include a review of the adequacy and effectiveness of the BMP being implemented at the site. If the project is subject to the General Construction Permit, then the inspection will also include review of: 1) the SWPPP and supporting documentation; 2) contractor site inspection records; and 3) any available monitoring results, if applicable. Previous inspection records for the site will be reviewed prior to any inspection. The inspector carries the following forms and equipment during the inspection:

- **Inspection Form** - To be completed during the inspection (See Appendix G);
- **SWPPP Checklist** - To review the SWPPP if applicable;
- **BMP Checklist** - To verify implementation of minimum BMPs;
- **Stormwater Discharge Parameter Benchmarks** - This table of generally acceptable analyte values for stormwater discharges may be used by the inspector during the review of monitoring results;
- **Camera** - To document site conditions.

A copy of the completed Inspection Form, is be provided to the site supervisor at the end of the inspection, or the next day. The inspector will review the results of the inspection with the site supervisor.

5.5.6 ENFORCEMENT MEASURES FOR CONSTRUCTION SITES

Any BMP violations noted, and / or exceedances of the benchmark water quality parameters, will be discussed with the site supervisor. If BMP violations and / or elevated levels are not being addressed by the site supervisor, the inspector will require the submittal of a written explanation and description of the actions that will be taken to correct the problem. The site supervisor will be given a corrective action order on the inspection form for each violation documented during the inspection. Corrective actions will be taken as soon as possible by the site supervisor (given safety considerations).

All construction activities undertaken in the Authority's jurisdiction are required to maintain compliance with the Authority Storm Water Code (Article 8.7), the Municipal Permit, the General Construction Permit (if applicable), and any requirements established in this SWMP.

The Authority will pursue appropriate enforcement actions as detailed in Article 8.7 of the Authority Code and described in Section 2.4 if violations discovered during an inspection are not resolved voluntarily by the site supervisor. Incidents of serious violations may result in the issuance of stop work orders and penalties.

5.5.7 NOTIFICATIONS TO THE RWQCB

Sites are considered non-compliant if one or more stormwater violations are discovered at a site. The Authority may issue a stop work order or other notice for incidents of repeat or serious violations. The Authority will notify the RWQCB of any stop work orders or other high level enforcement action issued to a construction site for stormwater violations.

If an incident or practice of non-compliance occurs, Authority Environmental Affairs Department staff will then determine if the incident poses a threat to human health or environmental health by considering the following criteria:

- Characteristics, quantity, and toxicity of substances / materials involved;
- Proximity of site to a sensitive water body (San Diego Bay);
- Proximity of site to an impaired water body (San Diego Bay);
- Proximity of site to a sensitive habitat / endangered species;
- Estimated volume of actual and / or potential discharge;
- If discharges to storm drain;
- Condition of storm drain (clog, etc.).

If the Authority determines that the incident does endanger human health or the environment, then the Authority will provide verbal notification to the RWQCB within 24 hours from the time the Authority becomes aware of the circumstances. Within 5 days of the time the Authority becomes aware of the circumstances, the Authority will provide the RWQCB with a written submission containing a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

5.6 CONSTRUCTION ACTIVITIES EFFECTIVENESS ASSESSMENT

The Authority has developed internal and external effectiveness assessment programs to evaluate the Authority staff, Authority boards, and tenant compliance with water quality issues. The Authority's Effectiveness Assessment component is described in Section 13.0 of this document.

5.7 PROGRAM REVIEW AND MODIFICATION

The Authority has reserved this section to identify and document future changes to the Construction Component of the SWMP. Section 14.0 of this SWMP details the program modifications made to the *SWMP January 2005-Revision* to bring this document into compliance with the renewed Municipal Permit.