

Electronic Site Inspection Guide for Operators

Last Reviewed: May 13, 2025

Construction Stormwater Inspections Overview

Construction stormwater inspections fall into two categories: (1) **operator site inspections** and (2) **regulatory oversight inspections**; each is 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 implemented, installed, functioning, and maintained. These inspections are internal to the project team and are a condition of permit compliance.

In contrast, **regulatory 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 approved 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 to the oversight authority; however, if an operator opts out, routine on-site inspections from the DWQ or MS4 will continue.

Areas of the Site to Photograph

If you, the operator, choose to participate in DWQ/MS4 electronic site inspections in place of on-site regulatory oversight inspections, you are confirming your intent to submit all necessary photographs and documentation required for the authorities to perform a remote electronic inspection. This includes providing geo-located and time-stamped photos of the 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.

Ensure that the photos are date/time-stamped to show when they were taken.

Additionally, **the geo-location must be visible on the photographs (as a stamp) and/or via the properties (metadata) of the photograph.** If you are unsure how to turn on the date/time-stamp or geo-locational features for your device, please research that or contact your local MS4 for potential guidance, as it varies by device/platform. The standard camera app on many devices will not stamp the photograph with the date/time and geo-location information, though some might, but there are numerous (free) apps (applications for mobile devices) that will do this, check your app store.

Submission Deadline (likely varies by MS4)

The applicable electronic site inspection documentation must be submitted **within the first 7 calendar days of each month** while under stormwater permit coverage. If the project is prioritized by the MS4 for additional inspections (law requires MS4s to prioritize certain sites), those priority projects require bi-weekly inspection by the MS4 so there would be a second submission deadline of the 22nd calendar day of each month. (Please contact your local MS4 to determine priority status of your project.) If your permit coverage begins on May 15, you must submit your first electronic inspection by June 7, and if it's a priority site then the 2nd submittal must be completed by June 22. These pictures and documentation must be current at the time of submittal; do not delay in sending those. Failure to provide complete or clear documentation may result in a request to submit additional documentation or a decision by the authority to conduct an on-site inspection.

Procedures for Participating in 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, time-stamped and 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
- Ensure it is possible to 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/name 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(11)(c) and (12), DWQ/MS4s 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.
2. Submitted documentation is insufficient, including altered photos or missed

submittal deadlines.

3. Immediate or imminent threat to water quality exists.
4. An illicit discharge or complaint requires an investigation.
5. The site is within one-half mile of a river, stream, or lake.

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/MS4 inspectors during an electronic 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 and compliance documentation and either (1) make them available online through a link to an electronic platform that will retain the documentation for at least 5-years and provide that link to the MS4, or (2) submit through an electronic portal provided by the local MS4. (Reach out to your local MS4 to confirm whether they have such a system in place and how to utilize it).

For any questions and further assistance with submitting an electronic site inspection please contact your local MS4.