

Appendix C2
Stormwater Pollution Prevention Plan Framework

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Acronyms and Abbreviations

BLM	Bureau of Land Management
EPA	Environmental Protection Agency
ESCP	Erosion and Sediment Control Plan
IPC	Idaho Power Company
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
ODEQ	Oregon Department of Environmental Quality
Project	Boardman to Hemingway Transmission Line Project
SWPPP	Stormwater Pollution Prevention Plan
U.S.	United States
USFS	United States Forest Service

APPENDIX C2 – STORMWATER POLLUTION PREVENTION PLAN FRAMEWORK

C2.1 Introduction

In compliance with criteria in the Environmental Protection Agency's (EPA's) Clean Water Act, all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, must obtain a National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges (Code of Federal Regulations, Title 40, Parts 122 and 123) in Idaho and Oregon.

NPDES permits (also called Construction General Permits) are issued by EPA in Idaho and by the Oregon Department of Environmental Quality (ODEQ) in Oregon following submittal of a Notice of Intent (NOI) for construction activities, and preparation of a Stormwater Pollution Prevention Plan (SWPPP) in Idaho and Erosion and Sediment Control Plan (ESCP) in Oregon (collectively called SWPPP/ESCP herein). The Boardman to Hemingway Transmission Line Project (Project) SWPPP/ESCP will describe how erosion and sediment transport will be minimized to adjacent waterbodies.

This plan applies to the construction of transmission structures, permanent and temporary access roads, multi-use areas, pulling and tensioning sites, and other ancillary work areas associated with the Project on lands managed by federal, cooperating agencies and other lands as negotiated between Idaho Power Company (IPC) and the land manager.

C2.1.1 Plan Framework Updates

This plan framework will support the National Environmental Policy Plan of Development sufficiently to complete and execute the Bureau of Land Management (BLM) and U.S. Forest Service (USFS) Records of Decision, the BLM right-of-way grant and USFS special-use authorization for the Project. This plan framework serves as a baseline document to guide development of the complete SWPPP developed with the Plan of Development before issuance of the Notice(s) to Proceed and commencement of construction. The complete SWPPP will be developed by the Construction Contractor(s) in consultation with IPC and the agencies as detailed engineering design of the Project is completed and will contain the detailed information necessary for site-specific guidance. This plan framework provides Project-specific guidance for development of the complete SWPPP by identifying treatments and measures required to avoid, minimize, and mitigate Project-related impacts; prevent unnecessary degradation of the environment; ensure stormwater pollution prevention activities comply with federal, state, or other agency requirements; and meet any stipulations of the Records of Decision, BLM right-of-way grant and USFS special-use authorization. The Construction Contractor(s) will be responsible for preparing and implementing the complete SWPPP.

C2.2 Purpose

The purpose of a SWPPP/ESCP for the Project is to identify and implement stormwater pollution prevention measures during construction, operations, and maintenance of the Project.

The Project SWPPP/ESCP will document environmental protection measures (EPMs) for all phases of construction. Construction will be conducted in an environmentally sensitive and responsible manner so no discharge of sediment or contaminants may be conveyed as either direct or indirect discharge to wetlands, waters of the United States, or the waters of the State of Oregon and Idaho.

Development, implementation, and maintenance of the SWPPP/ESCP will provide the contractor with the framework for reducing soil erosion and minimizing pollutants in stormwater during construction. The SWPPP will:

- Define the characteristics of the site and the type of construction that will be occurring.
- Describe the practices that will be implemented to control erosion and the release of pollutants in stormwater.
- Create an implementation schedule to ensure the practices described in the SWPPP are in fact implemented, and to evaluate the plan's effectiveness in reducing erosion, sediment, and pollutant levels in stormwater discharge from the site.
- Describe the final stabilization/termination design to minimize erosion and prevent stormwater impacts after construction is complete.

C2.3 Notification Requirements and Implementation

Before construction begins, the Construction Contractor will be responsible for developing a SWPPP/ESCP, and obtaining coverage under the NPDES General Permit by filing an NOI and appropriate fee with the EPA Region 10 for Idaho and ODEQ 1200-A Permit and 1200-C Permit in accordance with NOI instructions. The Construction Contractor will be responsible for implementing a site-specific SWPPP/ESCP and is required to perform routine inspections throughout the duration of construction activities.

The primary intent of the erosion and sediment control measures is to control and minimize erosion at the source. For the Project, the main source of potential stormwater contamination will be erosion of soils from construction activities. It will be the responsibility of the Construction Contractor to implement erosion control measures where necessary, in order to minimize pollutants in stormwater, and to keep the Project in compliance with EPA, ODEQ, and Department of Environmental Quality regulations.

A copy of the SWPPP/ESCP shall remain with the Construction Manager on the construction site or at a staging area(s), and be readily available while the transmission line and substations are under construction, from the start of construction activities until a Notice of Termination is filed.

The Construction Contractor must retain a set of construction site maps for the duration of the Project, and for 3 years after the Notice of Termination, that delineate the following items:

- Areas of soil disturbance that have been stabilized,
- Areas to be graded along with a time schedule,
- Areas of potential soil erosion where control practices will be implemented,
- Types of control practices and time schedule for implementation,
- Locations of any post-construction projects, and
- Copies of all inspections performed over the duration of the Project.

C2.4 Project Modifications

The Construction Contractor is responsible for maintaining an up-to-date SWPPP/ESCP and shall amend the SWPPP/ESCP whenever there is a change in construction or operations. The SWPPP/ESCP shall also be amended if it is in violation of the Construction General Permit or 1200-C Permit or has not achieved the general objective of eliminating pollutants in stormwater discharges. The SWPPP/ESCP shall be amended in a timely manner. All amendments should be dated and directly attached to the SWPPP/ESCP. The EPA or ODEQ may require the operator to amend the SWPPP/ESCP.

C2.5 Environmental Protection

Protection measures to ensure construction activities comply with EPA and Oregon requirements for stormwater management to be incorporated into the SWPPP/ESCP.

C2.6 Protection, Maintenance, Inspection, Repair, and Monitoring

The Construction Contractor shall at all times properly operate and maintain any facilities and systems of treatment and control (and related appurtenances). Proper operation and maintenance also include appropriate quality assurance procedures. Proper operation and maintenance may require the operation of backup or auxiliary facilities or similar systems if construction takes place in an above average precipitation year.

The Construction Contractor will be required to conduct routine maintenance and emergency repair on any structural controls, including the maintenance of erosion and sediment control measures and any required subsequent reporting. As part of the SWPPP/ESCP, the Construction Contractor will be required to develop an inspection schedule and conduct routine inspections to identify conditions that could lead to discharges of chemicals or contact of stormwater with storm drainages or surface waters. Schedules will be established for regular inspections of equipment and areas. Inspections of the construction site shall occur within 24 hours following any rainfall event of 0.5 inch or greater to identify areas contributing to a stormwater discharge and to evaluate whether industry standards are in place and functioning properly. For storm events with extended durations, observations shall be performed every 24 hours. During inspections, the Construction Contractor will also determine if the industry standards identified in the SWPPP/ESCP are adequate and whether additional control practices are needed. All monitoring and inspection records which have been produced in association with this SWPPP/ESCP will be retained for a period of at least 3 years.

To monitor the mitigation's effectiveness and to evaluate whether additional mitigation measures are required a monitoring program and reporting system will be followed. As part of this program, weather conditions should be monitored to prepare for precipitation events. It is recommended that weather forecasts be checked at least every week.

C2.7 Training

The Construction Contractor will be responsible for the SWPPP/ESCP implementation, amendments, and revisions. On-site construction personnel will be responsible for installation and maintenance of on-site mitigation measures.

Properly trained personnel are more capable of preventing spills, responding safely and effectively to accidents, and recognizing situations that could lead to stormwater contamination. The Construction Contractor will be responsible for familiarizing their personnel with the information contained within the SWPPP/ESCP. Training meetings will need to be held for new personnel who join the Project after the initial training has been provided. The purpose of these meetings will be to review the proper installation methods and maintenance of all erosion control measures to be used for the Project. The monitoring/inspection program and all required maintenance and repair will be conducted by trained personnel.

C2.8 Post-Construction Stormwater Management

Mitigation measures used to reduce pollutants in stormwater discharges after all construction phases have been completed at the sites should take into account local post-construction stormwater management

requirements, policies, and guidelines, as well as site-specific and seasonal conditions. Post-construction mitigation measures will be assessed during future line maintenance. During line maintenance, any areas disturbed by the line installation that are observed to be eroding sediment into drainages will be assessed for the appropriate permanent mitigation measure to control sediment movement off the disturbed area. Disturbed areas will also be reclaimed in accordance with the final Framework Reclamation Plan.