



**Year-End Performance Report
A Summary of Construction Compliance Reviews –
July 1, 2015 – June 30, 2016**

CTSW-RT-16-321.04.2

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<http://www.dot.ca.gov/hq/env/stormwater/index.htm>

Table of Contents

List of Figures	i
List of Tables	i
Acronyms, Abbreviations and Definitions	ii
1.0 Introduction.....	1
2.0 Elements of Construction Compliance Evaluation Plan.....	1
2.1 CCEP Process	1
2.2 Project Selection and Ranking Process.....	2
2.3 IQA Review Process.....	2
2.4 Elements of the Review Report.....	2
3.0 IQA Review Results.....	3
3.1 Total Numbers of Findings	3
3.2 Administrative Findings	4
3.3 Field BMP Findings	5
3.4 Field BMP Findings by Field BMP Type and IQA Reviewer Observation	6
4.0 Trends	11
5.0 Conclusion	12

List of Figures

Figure 3-1 Number of Findings by Field BMP Type in Descending Order.....	8
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List of Tables

Table 3-1 Summary of Findings	4
Table 3-2 Summary of Administrative Findings	5
Table 3-3 Summary of Field BMP Findings	6
Table 3-4 Findings by Field BMP Type.....	7
Table 3-5 Number of Findings by IQA Reviewer Observation.....	9
Table 4-1 Comparison of the BMPs with the Most Findings (in descending order) between the 2014 and 2015 YEPR	11

Acronyms, Abbreviations and Definitions

ASBS	Areas of Special Biological Significance
ATS	Active Treatment System
BMP	Best Management Practice
Caltrans	State of California, Department of Transportation
Caltrans Statewide Permit	National Pollutant Discharge Elimination System (NPDES) Statewide Storm Water Permit Waste Discharge Requirements (WDRs) for the State of California Department of Transportation (Order No. 2012-0011-DWQ, NPDES No. CAS000003)
CCEP	Construction Compliance Evaluation Plan
CFR	Code of Federal Regulations
CGP	Construction General Permit
Construction Activity	Any construction or demolition activity, clearing, grading, grubbing, excavation, or other activity that results in land disturbance. Construction does not include emergency construction activities required to immediately protect public health and safety or routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility.
Construction Site	Location where construction activity is performed.
CSMP	Construction Site Monitoring Program.
C/EP SWAT	Construction - Encroachment Permit Stormwater Advisory Team
CWA	Clean Water Act
DCSWC	District Construction Stormwater Coordinator
DEA-WQP	Division of Environmental Analysis - Water Quality Program
Discharge	When used without qualification, means the discharge of a pollutant
Discharge of a pollutant	The addition of any pollutant or combination of pollutants to waters of the United States from any point source, or any addition of any pollutant or combination of pollutants to the waters of the contiguous zone or the ocean from any point source other than a vessel or other floating craft which is being used as a means of transportation. The term includes additions of pollutants to waters of the United States from: surface runoff which is collected or channeled by man; discharges through pipes, sewers, or other conveyances owned by a State, municipality, or other person which do not lead to a treatment works; and discharges through pipes, sewers, or other conveyances, leading into privately owned treatment works.
DSA	Disturbed Soil Area
IQA	Independent Quality Assurance (IQA). The independent third party conducts the IQA construction project reviews for the Caltrans Statewide Permit-required self-audit program.
Non-compliance	Failure to meet any field and administrative requirement of the SWMP or Caltrans Statewide Permit or to meet any applicable water quality

standard. This includes failure to install required BMPs or conduct required monitoring or maintenance. It also includes discharges or prohibited non-storm water that do not meet the definition of emergency incidents. It does not include determinations by Caltrans or a RWQCB Executive Officer that a discharge is causing or contributing to exceedances of an applicable water quality standard.

Non-stormwater	Discharges that are not induced by precipitation events and are not composed entirely of stormwater. These discharges include, but are not limited to, discharges of process water, air conditioner condensate, non-contact cooling water, vehicle wash water, concrete washout water, paint wash water, irrigation water, pipe testing water, lawn watering overspray, hydrant flushing, and firefighting activities.
NPDES	National Pollutant Discharge Elimination System
PLACS	Permits, Licenses, Agreements, Certifications and Approvals
Pollutant	Dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials (except those regulated under the Atomic Energy Act of 1954, as amended [42 U.S.C. 2011 et seq.]), heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water (Permit Attach. VII).
QA	Quality Assurance
RE	Resident Engineer
Review Report	Construction Project Site Stormwater Compliance Review Report used in the self-audit program for construction activities.
RWQCB	Regional Water Quality Control Board
Sediment	Soil, sand, and minerals washed from land into water, usually after rain.
Sensitive water body	As defined in the CCEP, includes water bodies listed for Areas of Special Biological Significance in the Permit Attachment III and listed water bodies pursuant to CWA Section 303(d).
SMARTS	Storm Water Multiple Application and Record Tracking System
Stormwater	Stormwater runoff, snowmelt runoff, and surface runoff and drainage, as defined in 40 CFR 122.26.b.13.
Surface water	Collectively includes Waters of the State, Waters of the U.S. and sensitive water bodies.
SWMP	Storm Water Management Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TMDL	Total maximum daily load
U.S.	United States
U.S.C.	United States Code
U.S. EPA	United States Environmental Protection Agency

U.S. EPA R-9 A.O	United States Environmental Protection Agency – Region 9 Administrative Order
Waters of the State	Any surface water or groundwater, including saline waters, within boundaries of the state as defined in California Water Code §13050(e).
Waters of the U.S.	All waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters subject to the ebb and flow of the tide. Waters of the United States [as defined in 40 CFR §230.3(s)] include all interstate waters and intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds the use of which would affect or could affect interstate or foreign commerce. The definition also applies to tributaries of the aforementioned waters. See 40 CFR §122.2 for the complete definition, which is hereby incorporated by reference.
WDRs	Waste Discharge Requirements. “NPDES Permits” as used in the federal Clean Water Act (33 U.S.C. §1251 et seq.; Permit Finding 4).
WPCM	Water Pollution Control Manager
WPCP	Water Pollution Control Program
WQSWAT	Water Quality Stormwater Advisory Team
YEPR	Year-End Performance Report

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1.0 Introduction

This Year-End Performance Report – September 2016 (2016 YEPR) summarizes the Independent Quality Assurance (IQA) reviews conducted between July 1, 2015 and June 30, 2016 by the independent assurance portion of the self-audit program implemented by the State of California, Department of Transportation (Caltrans) for evaluating construction activities at construction sites. This document reports the data necessary to ascertain whether the appropriate level of stormwater pollution control was achieved at Caltrans construction projects statewide during the 2015-2016 reporting period.

In July 2008, Caltrans adopted the *Construction Compliance Evaluation Plan CTSW-PL-08-999.54.1* (2008 CCEP). Since the 2008 CCEP was implemented, Caltrans has modified the construction compliance evaluation procedures to be responsive to subsequent regulatory drivers, including the California State Water Resources Control Board (SWRCB) Order No. 2012-0011-DWQ, NPDES No. CAS000003, Statewide Storm Water Permit Waste Discharge Requirements for State of California Department of Transportation (Caltrans Statewide Permit) and Order No. 2010-0014-DWQ, NPDES No. CAS000002, General Permit for Storm Water Discharges Associated With Construction and Land Disturbance Activities (CGP).

In April 2015, Caltrans adopted a revised approach to assess the appropriate level of stormwater pollution control at construction projects. This revised approach is described in the *Stormwater Program - Construction Compliance Evaluation Plan CTSW-PL-15-321.03.1* (CCEP). This 2016 YEPR reports the data gathered during IQA Reviews at Caltrans construction projects statewide during the reporting period.

2.0 Elements of Construction Compliance Evaluation Plan

Section 2.0 presents an overview of the CCEP. This section is organized by presenting the following:

- A summary of the CCEP process;
- Project selection and ranking process;
- A summary of The IQA Review Process; and
- Elements of the Project Stormwater Review Report (Review Report).

2.1 CCEP Process

The CCEP process includes the following activities to evaluate the implementation of stormwater pollution prevention measures at construction projects:

- Developing and maintaining a list of construction projects for review;
- Providing 24-hour notification of IQA site review to the resident engineer (RE), Senior RE, Construction Manager, and District construction Stormwater Coordinator (DCSWC);
- Conducting the site review;
- Completing the Construction Review Report; and
- Initiating the Corrective Action process

The corrective actions are not an element of the third-party consultant IQA review process. As described in Construction Procedure Directive 15-1 dated March 25, 2015, the RE is responsible for coordinating with the DCSWC.

The CCEP process also provides feedback procedures and a method for program improvement by reporting the following:

- Best management practice (BMP) implementation based upon the observed trends detected in the data collected from IQA reviews; and
- The adequacy of guidance documents and contract documents

The above reporting facilitates program improvements, including Storm Water Management Plan (SWMP) improvements, training, research, updates to guidance documents, updates to specifications and updates to the CCEP.

2.2 Project Selection and Ranking Process

The Division of Environmental Analysis - Water Quality Program (DEA-WQP) compiled and maintained a comprehensive list of construction projects by drawing from active construction projects presented in Storm Water Multiple Application and Report Tracking System (SMARTS) and cross checked this list with the following two information sources:

- Headquarters Division of Construction statement of ongoing construction projects; and
- District information on oversight projects

Review priority was given to construction projects “based on their relative risk to water quality, using among other approaches the Risk Determination Methodology contained in the CGP and the Clean Water Act 303(d) list of impaired water bodies” (U.S. EPA R-9 A.O).

2.3 IQA Review Process

The third-party consultant conducted the following activities during the reporting period between July 1, 2015 and June 30, 2016:

- Assisted in selection of construction projects for IQA Reviews;
- Assisted with the 24-hour notification to required Caltrans staff;
- Conducted site reviews;
- Observed the conditions of stormwater pollution prevention measures implemented at the construction site and recorded instances where BMPs were not meeting contract document requirements, applicable CGP requirements, or applicable permits, licenses, agreements, and certifications, and approvals (PLACS) relative to stormwater BMP requirements.
- Provided a verbal debriefing of findings to the RE or the RE’s representative and followed up with written and signed Review Report delivered to the RE and other Caltrans staff within 24 hours of the site review; and
- Collected all Review Reports for future data processing and storage.

2.4 Elements of the Review Report

The IQA reviewer evaluated stormwater compliance at a construction site by comparing observed site conditions, including project stormwater contract administration, with the following:

- SWRCB regulatory drivers, e.g., the CGP and the Caltrans Statewide Permit;
- PLACS and the Lahontan Regional Water Quality Control Board Permit, as applicable;
- Caltrans 2010 Standard Specifications and 2010 Standard Plans.

The Review Report documents the following the construction project information and observations:

- IQA reviewer, review date, and review participants;
- Caltrans contract number, County-Route-Post Mile, project name, and project description;
- Name and contact number for the RE and Water Pollution Control Manager (WPCM);
- Weather conditions, risk level, receiving water body, and amount of active and inactive DSAs; and
- PLACS.

The Review Report documents the information concerning administrative findings and field BMP findings. See Section 3.0, IQA Review Results, for further detail.

3.0 IQA Review Results

This section presents the IQA review findings as observed at Caltrans construction projects from July 1, 2015 to June 30, 2016. The total numbers of findings including total administrative and field BMP findings are presented first, followed with findings by administrative and field BMP categories, and lastly more detailed information concerning findings by field BMP types and IQA reviewer observations.

3.1 Total Numbers of Findings

Table 3-1 presents a summary of the total numbers of IQA review findings. The total numbers are further divided into totals of administrative and field BMP findings. Some districts were visited more than others because of the number of available projects and the project ranking process. Items of note in the following table are as follows:

- 236 IQA Reviews were conducted in the reporting period
- Construction projects were visited in all districts
- Very few administrative findings were noted during the IQA review. Administrative findings averaged less than one per IQA review.
- Field BMP findings averaged approximately 10 per IQA review.

Table 3-1 Summary of Findings				
District	Number of Sites Reviewed	Number of Findings		
		Total	Administrative	Field BMPs
1	10	20	1	19
2	14	101	6	95
3	19	203	10	193
4	39	356	32	324
5	13	63	2	61
6	18	171	18	153
7	40	598	22	576
8	21	446	8	438
9	4	10	4	6
10	16	223	6	217
11	26	112	19	93
12	16	105	8	97
Total	236	2408	136	2272

3.2 Administrative Findings

Table 3.2 presents the summary of administrative findings separated into several categories. The definitions of each category are as follows:

- **Plans and Permits:** Queries the IQA reviewer with two questions - whether the SWPPP is located on site and was it developed by a QSD.
- **Training:** Queries the IQA reviewer with two questions - whether the WPCM is certified as a QSD (or QSP for WPCP construction projects) and is the contractor conducting regular training with adequate documentation.
- **SMARTS:** Queries the IQA reviewer with one question - whether appropriate annual reporting is uploaded into SMARTS.
- **Active Treatment System (ATS):** Queries the IQA reviewer with one question - for construction projects that employ an ATS, are all the required procedures of the ATS followed.
- **Construction Site Monitoring:** Queries the IQA reviewer with three questions - whether all of the site monitoring has been completed, and if a NAL has been exceeded, has a report been developed and reported to the SWRCB.
- **Tahoe Permit:** Queries the IQA reviewer with three questions - for projects within the Tahoe Permit, has a Restoration Monitoring Plan been developed, are there waste prohibition exemptions on file (100 year floodplain), and have all analytical information been uploaded into SMARTS within 5 days.

Items of note in the following table are as follows:

- No findings were encountered for administrative categories SMARTS and Tahoe Permit.
- Findings in the Training category have been encountered the most of all administrative categories.
- Construction Site Monitoring is mostly implemented at reviewed sites. The IQA reviewer at eighty-four percent (84%) of the construction projects encountered no construction site monitoring findings.

Table 3-2 Summary of Administrative Findings								
District	Number of Sites Reviewed	Total Findings	Administrative Category					
			Plans and Permits	Training	SMARTS	Active Treatment System	Construction Site Monitoring	Tahoe Permit
1	10	1	0	0	0	0	1	0
2	14	6	0	4	0	0	2	0
3	19	10	2	8	0	0	0	0
4	39	32	4	19	0	1	8	0
5	13	2	0	1	0	0	1	0
6	18	18	0	13	0	0	5	0
7	40	22	0	14	0	0	8	0
8	21	8	0	6	0	0	2	0
9	4	4	0	3	0	0	1	0
10	16	6	0	4	0	0	2	0
11	26	19	2	12	0	0	5	0
12	16	8	0	6	0	0	2	0
Total	236	136	8	90	0	1	37	0

3.3 Field BMP Findings

Table 3.3 presents a summary of the field BMP findings separated into the six standard field BMP categories as follows:

- **Soil Stabilization:** Includes preservation of vegetation, temporary cover of DSAs, temporary run-on and run-through control, and streambank stabilization.
- **Sediment Control:** Includes temporary perimeter control, temporary face of slope controls, temporary check dams and temporary drain inlet protection.
- **Tracking Control:** Includes stabilized construction entrance, stabilized construction roadways, and tire washes.
- **Wind Erosion Control:** Includes the control of dust throughout the construction site.
- **Non-Stormwater Control:** Includes dewatering, paving and sawcutting operations, temporary stream crossings and clear water diversions, equipment cleaning, fueling, and maintenance, pile driving operations, and working near and over water.

- **Materials and Waste Management Control:** Includes material storage and use, stockpile management, spill prevention and control, and waste management including solid, hazardous, contaminated soil, concrete, sanitary, and liquid wastes.

Items of note in the following table are as follows:

- Approximately forty-eight percent (48.5%) of the total findings were in the field BMP category of Materials and Waste Management Control.
- Approximately thirty-five percent (34.5%) of the total findings were in the field BMP category of Sediment Control.
- Approximately seventeen percent (16.5%) of the total findings were in the field BMP categories of Soil Stabilization, Tracking Control, and Non-Stormwater Control.

Table 3-3 Summary of Field BMP Findings								
District	Number of Sites Reviewed	Total Findings	Field BMP Category					
			Soil Stabilization	Sediment Control	Tracking Control	Wind Erosion Control	Non-Stormwater Control	Materials & Waste Management
1	10	19	0	10	1	0	0	8
2	14	95	8	27	3	0	3	54
3	19	193	25	91	8	1	9	59
4	39	324	15	122	8	1	11	167
5	13	61	9	17	5	0	5	25
6	18	153	10	36	18	0	5	84
7	40	576	55	190	25	7	23	276
8	21	438	22	127	20	0	16	253
9	4	6	0	2	0	0	0	4
10	16	217	18	62	14	0	10	113
11	26	93	8	56	7	3	4	15
12	16	97	4	44	2	1	3	43
Total	236	2272	174	784	111	13	89	1101

3.4 Field BMP Findings by Field BMP Type and IQA Reviewer Observation

Table 3.4 presents a summary of the field BMP findings by field BMP type and specific IQA reviewer observations.

Each field BMP type has standards that regulate the correct application (e.g., is the BMP implemented or implemented as intended?), the correct installation or placement, utilizing the correct materials, and the proper maintenance. The following table indicates the number of findings for each field BMP type that did not meet one of these listed standards.

Table 3-4 Findings by Field BMP Type			
BMP Category	BMP Type	BMP Name	Number of Findings
Soil Stabilization	SS-1	Scheduling	1
	SS-2	Preservation of Existing Vegetation	10
	SS-3	Hydraulic Mulch	83
	SS-5	Soil Binder	15
	SS-6	Straw Mulch	2
	SS-7	Geotextiles, Mats, Plastic Covers and Erosion Control Blankets	46
	SS-9	Earth Dikes/Drainage Swales and Lined Ditches	13
	SS-10	Outlet Protection/Velocity Dissipation Devices	1
	SS-11	Slope Drains	3
Sediment Control	SC-1	Silt Fence	145
	SC-4	Check Dams	44
	SC-5	Fiber Rolls	285
	SC-6	Gravel Bag Berm	42
	SC-7	Street Sweeping and Vacuuming	93
	SC-9	Temporary Straw Bale Barrier	1
	SC-10	Storm Drain Inlet Protection	174
Tracking Control	TC-1	Stabilized Construction Entrance/Exit	111
Wind Erosion Control	WE-1	Wind Erosion Control	13
Non-Stormwater Control	NS-1	Water Conservation Practices	3
	NS-2	Dewatering Operations	6
	NS-3	Paving and Grinding Operations	28
	NS-4	Temporary Stream Crossing	1
	NS-5	Clear Water Diversion	1
	NS-6	Illicit Connection/Illegal Discharge	1
	NS-8	Vehicle and Equipment Cleaning	3
	NS-9	Vehicle and Equipment Fueling	4
	NS-10	Vehicle and Equipment Maintenance	33
	NS-11	Pile Driving Operations	1
	NS-13	Materials and Equipment Use Over Water	5
	NS-14	Concrete Finishing	3

Table 3-4 Findings by Field BMP Type (continued)			
BMP Category	BMP Type	BMP Name	Number of Findings
Materials and Waste Management	WM-1	Material Delivery & Storage	184
	WM-2	Material Use	8
	WM-3	Stockpile Management	193
	WM-4	Spill Prevention and Control	64
	WM-5	Solid Waste Management	495
	WM-6	Hazardous Waste Management	9
	WM-7	Contaminated Soil Management	1
	WM-8	Concrete Waste Management	140
	WM-9	Sanitary/Septic Waste Management	6
	WM-10	Liquid Waste Management	1

Figure 3-1 presents Table 3-4 information presented as a bar graph with the field BMP with highest number of findings on the far left and in descending order of findings towards the right for the other field BMPs.

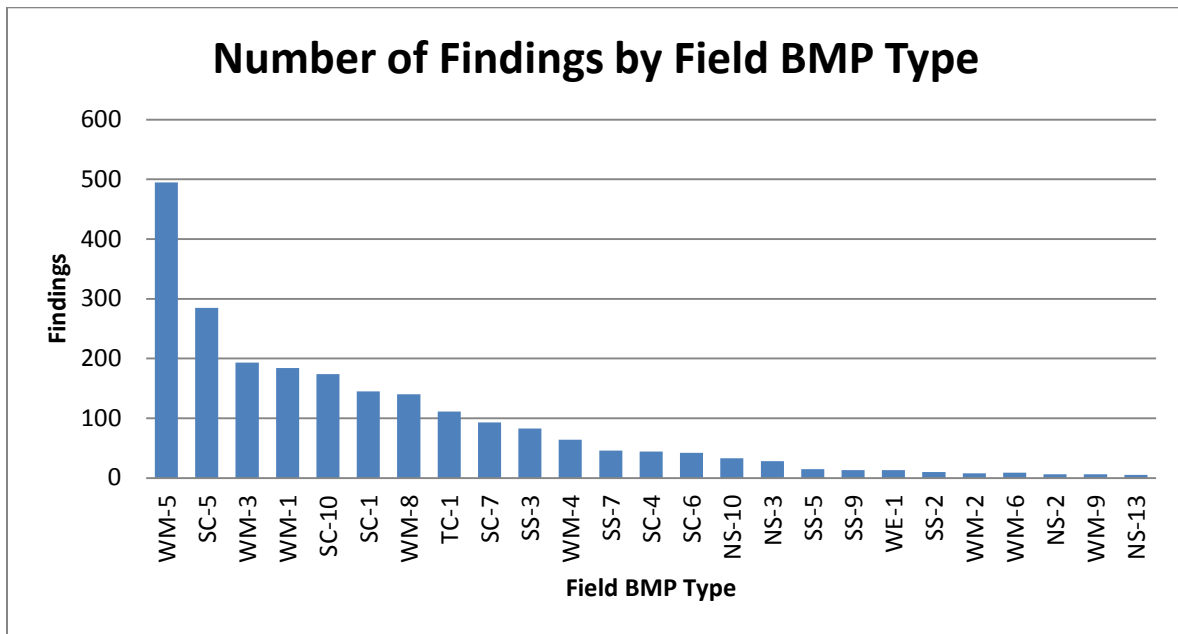


Figure 3-1 Number of Findings by Field BMP Type in Descending Order

An item to note concerning Figure 3-1 is that the top ten BMPs with the most field BMP findings total 369 findings which represent eighty-four percent (83.8%) of all the findings. Nine of this year’s top ten findings were the same as last year. WM-4, Spill Prevention and control dropped out of the top ten (eighth position last year dropping to eleventh position this year) and was replaced by SS-3, Hydraulic Mulch(eleventh position last year climbing to tenth position this year). These ten field BMP types are as follows:

1. WM-5, Solid Waste Management 495
2. SC-5, Fiber Rolls 285

3.	WM-3, Stockpile Management	193
4.	WM-1, Material Storage and Delivery	184
5.	SC-10, Storm Drain Inlet Protection	174
6.	SC-1, Silt Fence	145
7.	WM-8, Concrete Waste Management	140
8.	TC-1, Stabilized Construction Entrance/Exit	111
9.	SC-7, Street Sweeping and Vacuuming	93
10.	SS-3, Hydraulic Mulch	83
	Total	1903

As stated in Section 2.4, the reviewer includes photographic documentation of each finding which includes a description of the observation. Table 3-5 presents the number of findings based on like observations.

Table 3-5 Number of Findings by IQA Reviewer Observation	
IQA Reviewer Observation	Number of Findings
1. Trash and Debris Accumulated On-site	409
2. Perimeter Controls Not Maintained	261
3. Stockpile Without Cover and/or Linear Barrier	124
4. Liquid Materials or Wastes Not in Secondary Containment	108
5. DSA Missing Perimeter Controls	100
6. Inactive DSA Missing Soil Cover	99
7. Paved Areas Not Swept Promptly	91
8. Drain Inlet BMP Not Maintained	88
9. Concrete Operation Waste Not Collected Promptly	78
10. Liquid Hazardous Materials Spilled/Leaked onto Ground Surface	54
11. Inactive DSA Missing Controls on Face of Slope	47
12. Stabilized Entrance Not Maintained	47
13. Missing Drain Inlet Protection	46
14. Fiber Rolls Not Trenched and Staked	40
15. Construction Access Missing Stabilized Entrance	40
16. Drain Inlet Protection Not Installed Correctly	39
17. Dumpster Not Covered at Day's End or During Rain Event	36
18. Trash Container Exceeded Capacity	35
19. Treated Wood Not on a Pallet and/or Covered	35
20. Other Miscellaneous Observations	35

Table 3-5 Number of Findings by IQA Reviewer Observation (Continued)	
IQA Reviewer Observation	Number of Findings
21. Check Dams Not Installed Correctly or Not Maintained	33
22. Stored Materials Mismanaged (Without Pallet and/or Cover, Spilled, and/or Not Labeled)	33
23. Concrete Washout Not Constructed Correctly or Not Maintained	33
24. Soil Cover Not Maintained	33
25. Leaking Equipment Should Be Repaired or Removed	29
26. Concrete Washout Exceeded Capacity	26
27. Cold Mix Stockpile Not Covered, Placed on an Impervious Liner, and/or Surrounded By a Linear Barrier	26
28. Perimeter Controls Not Located or Not Installed Correctly	25
29. Run-on and/or Run-through is Mismanaged	23
30. Stockpile Controls Not correctly Installed	20
31. Secondary Containment Not Constructed Correctly or Not Maintained	19
32. Stabilized Entrance Not Installed Correctly	17
33. Trash Container is Not Watertight	16
34. Paving or Pile Driving Equipment Not Stored on Plastic	15
35. Sediment Not Controlled for Wind	13
36. Improper Paving, Grinding, or Sawcutting Controls	12
37. Stockpile Within 100 feet of Concentrated Flows or Inlets	11
38. Gravel Bags Are Wrong Material	10
39. Stockpile Cover and/or Linear Barrier Not Maintained	9
40. ESA Fencing Not Maintained	9
41. Improper Vehicle Cleaning, Fueling, or Maintenance	9
42. Construction Traffic Not Limited to Stabilized Exit	7
43. Sanitary Facility Within 50 feet of Flow Line or Not Contained	6
44. Improper Sandblasting or Concrete Finishing	6
45. Material Use Mismanaged	6
46. Improper Containment While Working Over Water	5
47. Active DSA Missing Soil Cover (During Rain Event)	5

Further definitions and examples of some of the top findings listed in Table 3-5 are as follows:

1. Trash and Debris Accumulated On-site - Findings from this item generally included accumulated construction waste that was gathered somewhere on the construction site, but was not placed in a dumpster. Evidence indicated that this trash and debris had been at this location longer than a week.
2. Perimeter Controls Need Maintenance - Findings from this item generally included silt fence that was dilapidated or otherwise sagging, torn, and/or unraveled, fiber rolls that were torn and/or unraveled, gravel bag berms that were dilapidated, or silt fence, fiber rolls or gravel bag berms that had accumulated sediment that exceeded one-third the height of the barrier.
3. Stockpile Without Cover and/or Linear Barrier - Findings from this item generally include inactive concrete rubble waste, aggregate materials, and/or soil stockpiles that were not covered and/or surrounded by a linear barrier
4. Liquid Materials or Wastes Not in Secondary Containment - Findings from this item generally included liquid materials, wastes, and/or fuels for equipment that were not properly stored in secondary containment.
5. DSA Missing Perimeter Controls - Findings from this item generally included construction areas which created disturbed soil in which no perimeter controls (silt fence, fiber rolls, or gravel bag berm) was in place. The DSAs were active or inactive.
6. Inactive DSA Missing Soil Cover - Findings from this item generally included construction areas which created disturbed soil and were left idle for more than fourteen days in which no soil cover (hydraulic mulch, hydroseed, soil binder, straw mulch, plastic cover/erosion control blanket, or wood mulch) was in place.
7. Paved Areas Not Swept Promptly - Sediment tracked onto paved surfaces within and/or outside of the construction area which was not swept up or otherwise removed within the 1 hour or 24 hour minimum time period as specified.
8. Drain Inlet BMP Not Maintained - Findings from this item generally included the accumulation of sediment and debris within the drain inlet control or the materials the made up the drain inlet BMP were damaged or no longer arranged properly.
9. Concrete Operation Waste Not Collected Promptly - Findings from this item generally included Portland Cement Concrete (PCC) operation waste not collected promptly. This finding was noted whenever PCC waste (that was not from grinding, grooving, or sawcutting) was noticed on the ground.

4.0 Trends

Table 4-1 presents the BMPs from the 2015 and 2016 YEPRs that were associated with the most number of findings in the reporting year. The BMPs in Table 4-1 are in descending order, i.e., the BMPs listed at the top had the most findings associated with them.

Table 4-1 Comparison of the BMPs with the Most Findings (in descending order) between the 2015 and 2016 YEPR	
Field BMPs With the Most Associated Findings (in descending order)	
2016 YEPR	2015 YEPR
1. WM-5, Solid Waste Management	1. WM-3, Stockpile Management
2. SC-5, Fiber Rolls	2. WM-5, Solid Waste Management
3. WM-3, Stockpile Management	3. SC-5, Fiber Rolls

4. WM-1, Material Storage and Delivery	4. WM-1, Material Storage and Delivery
5. SC-10, Storm Drain Inlet Protection	5. SC-1, Silt Fence
6. SC-1, Silt Fence	6. SC-10, Storm Drain Inlet Protection
7. WM-8, Concrete Waste Management	7. TC-1, Stabilized Construction Entrance
8. TC-1, Stabilized Construction Entrance	8. WM-4, Spill Prevention and Control
9. SC-7, Street Sweeping and Vacuuming	9. SC-7, Street Sweeping and Vacuuming
10. SS-3, Hydraulic Mulch	10. WM-8, Concrete Waste Management

These lists match up quite well, with 9 Field BMPs common between the 2 lists of 10 Field BMPs. The top 6 Field BMPs in the 2016 YEPR are the same as the top 6 Field BMPs in the 2015 YEPR. The only changes to the list in the 2015 YEPR Top 10 list is that WM-4, Spill Prevention and Control has been replaced with SS-3, Hydraulic Mulch which was in the eleventh position in the 2015 YEPR. WM-4, Spill Prevention and Control is in the eleventh position in the 2016 YEPR. It can be concluded from this brief analysis that the types of BMPs resulting in the most findings have not changed significantly between the 2015 and 2016 YEPR. This conclusion was the same for the 2014 and 2015 YEPR.

5.0 Conclusion

This 2016 YEPR summarizes construction project IQA reviews conducted between July 1, 2015 and June 30, 2016 by the independent assurance portion of the self-audit program implemented by Caltrans. These IQA reviews were conducted in accordance with the CCEP. The conclusions drawn from these reviews and are as follows:

- The 236 reviews resulted in 136 administrative and 2272 field BMP findings, for a total of 2408 findings.
- Very few administrative findings were noted during the IQA reviews, averaging less than one per IQA review. The category with the most administrative findings was training (38.1% of the total).
- Field BMP findings at IQA reviews averaged approximately 10 per review. The BMP categories with the most field BMP findings were Materials and Waste Management Control (48.5% of the total BMP findings) and Sediment Control (34.5% of the total BMP findings).
- The 4 field BMP types that had the most findings were, in descending order, 1) Solid Waste Management, 2) Fiber Rolls, 3) Stockpile Management, and 4) Material Delivery and Storage.
- The 4 most common observations were, in descending order, 1) Trash and Debris Accumulated on Site, 2) Perimeter Controls Not Maintained, 3) Stockpile Needs Cover and/or Linear Barrier, and 4) Liquid Materials or Wastes Not in Secondary Containment.
- In general, the types and categories of findings were consistent with those found in the previous 3 years of the Self-Audit Program.