

## Attachment C

### **Teichert Construction – Construction Stormwater General NPDES Permit Commitments**

Teichert Construction is committed to sound environmental stewardship at its project sites and seeks to be a positive project partner with state and local agencies in implementing the State Water Resources Control Board's Construction Stormwater General NPDES Permit (CGP). To that end, Teichert Construction will ensure the following items are implemented at active sites within the Lahontan region, and will work cooperatively with the Town of Truckee (Town) towards the commitments they are concurrently providing:

1. **SWPPP Preparation:** Implement a QC/QA protocol for Stormwater Pollution Prevention Plan (SWPPP) preparation to ensure requirements are tailored to specific projects and to ensure SWPPP elements that differ from, or are more stringent than, CGP requirements are clearly identified. Include this QC/QA protocol in Teichert Construction's Housekeeping Code of Safe Practices (COSP).
2. **Training:**
  - a. Conduct annual water pollution control project manager training for all project managers (*e.g.*, 8 hour comprehensive training recently performed by Verux). Repeat the annual training before each wet season. If a new project manager joins, provide the training within six (6) months of the hiring date (if the annual training does not already occur within 6 months of the hiring date).
  - b. Conduct project manager-specific training on the project specific SWPPPs in coordination with QSD/QSP, *i.e.*, when the SWPPP differs from CGP or other project components or actions. Repeat the project manager training before each wet season.
  - c. Require all project managers to attend training on the 2022 CGP by qualified personnel.
  - d. These activities will supplement the existing weekly tailgate and ongoing training for onsite craft personnel.<sup>1</sup>
3. **On-site Documentation:** Ensure water pollution control materials are on-site, visible (when onsite physically), and available for use and during inspections. With the 2022 CGP allowing for electronic copies, determine location and format of SWPPP at pre-construction meeting with local agency and Water Board staff (if electronic is the intended manner of SWPPP availability, confirm and document agreement).

---

<sup>1</sup> Please note that all onsite training documents are bi-lingual, in English and Spanish.

4. Inspections: Conduct inspections consistent with the CGP throughout the year (unless road closures or safety issues preclude, which will be timely documented) until Notice of Termination submitted for approval. Develop a project specific checklist of required inspections that will be shared with the local agency and Regional Water Board staff prior to project commencement.
5. Inspection Report Review and Response Protocol: Prepare and implement inspection report (Water Board or QSP) review and response protocol to ensure implementation of repairs or other action commence within 72-hours. This protocol will be reflected in a newly created internal SWPPP COSP.
6. Documentation of Response Protocol: Document weekly review and response actions.
7. On-site Checklists: Prepare and implement on-site checklist for pre-inspection activities.
8. Winterization: Ensure project team and SWPPP emphasis on timely winterization efforts in regionally impacted projects (e.g., Truckee, where there is snow). Teichert will also hold a pre-winterization meeting with the local agency and Regional Water Board staff to ensure winterization efforts and inspection frequency are appropriate.

### **Town of Truckee Construction General Permit Process Commitments**

The Town of Truckee (Town) is committed to continuing to improve its municipal stormwater program, including its associated construction program. To best promote compliance with the CGP requirements, the Town agrees to implement the following process changes and take other actions as specified below:

1. On or before July 1, 2024, the Town will update its public works construction contract and related bid documents to reflect the requirements of the new CGP that will become effective on September 1, 2023. As part of this update, the Town will specify the roles and responsibilities of the Town, the contractor, the QSD, and the QSP/QSP delegate, and will require the contractor to address and timely implement all applicable corrective actions identified by the QSP pursuant to the requirements of the CGP.
2. For all new public works construction projects that are governed by the CGP, and on which the Town is the Legally Responsible Person (LRP), the Town shall, prior to CGP enrollment, conduct a quality control assessment with the contractor of the SWPPP developed by the QSD in order to confirm roles and

responsibilities and to verify the specific stormwater requirements for the project. For all pending public works construction projects that have CGP coverage, that remain active, and on which the Town is LRP, the Town shall meet with the contractor to review the SWPPP within forty-five (45) days of the final approval of this settlement.

3. For all new public works construction projects that are governed by the CGP, and on which the Town is LRP, the Town shall require that all pending corrective actions identified by the QSP/QSP delegate be discussed at a weekly construction meeting and that the contractor shall commence and document actions to timely address and/or implement the corrective actions. The Town will include this as a requirement in its updated construction contract.
4. On or before July 1, 2024, the Town will require its project managers and inspectors that work on CGP-related project, to attend a CGP training (minimum two (2) hours), to include requirements to timely address QSP identified corrective actions. New employees serving as project managers or inspectors shall receive this training within six (6) months of hire. The Town will require its project managers and inspectors to attend a refresher training (minimum one (1) hour) every two years after receiving the initial training.
5. Not later than July 1, 2024, after the training required by paragraph 4 above occurs, as part of the Town's inspection process of projects subject to the CGP on which the Town is the LRP, the Town's project managers and inspectors shall document on the Town's inspection reports implementation of QSP identified corrective actions or steps taken by the Town, including but not limited to stop work orders, to require such implementation.
6. If Regional Board staff agrees to attend and present, the Town will host a public education session regarding the winterization/inactive status process and required inspections of winterized projects. The Town will host this education session within ninety (90) days of the final approval of this settlement and Regional Board staff's agreement to participate. The Town will invite contractors, municipal staff and members of the public throughout the Truckee Watershed to attend, including, but not limited to the Contractors Association of Truckee Tahoe. The Town will also work with Regional Board staff to provide public notice of this education session.
7. The Town shall cause all required CGP inspections to occur on all public works construction projects governed by the CGP and on which the Town is the LRP,

including, without limitation, required inspections of projects subject to winterization/inactive status.