



## Revisions to the Water Quality Specifications

The guidance provided in this Bulletin should be followed for all projects holding a Colorado Discharge Permit System–Stormwater Construction Permit (CDPS-SCP) also known as the COR400000. Projects currently under construction shall add the following Standard Special Provisions (SSPs) and revised M-Standards and Form 1176 into their projects with a Contract Modification Order (CMO). Reach out to your Construction Area Engineer for questions regarding this CMO.

- [Section 107.25 SSP](#)
- [Section 208, 213, and 216 SSP](#)
- [M-208-01](#)
- [Form 1176, Revised May 2024](#)

The purpose of this Bulletin is to provide information and instruction regarding revisions to the following Standard Specifications and Standard Plans included in these SSPs:

1. Subsection 107.25, Water Quality Control
2. Section 208, Erosion Control
3. Section 213, Mulching
4. Section 216, Soil Retention Covering
5. Standard Plan M-208-1, Temporary Erosion Control

Changes to these specifications, also known as the Water Quality Specifications, were made to comply with the requirements of the new CDPS-SCP. The new CDPS-SCP was issued on January 31, 2024, and became effective on April 1, 2024.

## Nomenclature Changes

Changes were incorporated to ensure consistent nomenclature is utilized within the Water Quality Specifications. While the majority of these changes were minor, some changes may impact project documentation, such as the Stormwater Management Plan (SWMP). For example, the following nomenclature has been adopted and will impact documentation:

### *Form 1176 Inspection*

Previous names: seven-day inspections, site inspections, Inspections

Description: Form 1176 Inspections are the Contractor-led inspections required for compliance with the CDPS-SCP. The term “Form 1176 Inspections” was used for consistency and to clarify the difference between inspections performed by the Contractor and those conducted by CDOT.

### *Monthly Audit Report (MAR)*

Previous names: Headquarters and Region water quality control inspections, Headquarters or Region water quality routine audits, Water Quality Audit Reports, water quality inspections, routine stormwater management inspection, CDOT MS4 inspection

Description: MARs are the CDOT-led water quality audits required for compliance with CDOT’s MS4 permit. In this update, all such CDOT-led audits will be called Monthly



Audit Reports or MARs. This change was to improve consistency within the specifications and to reduce confusion between the Contractor-led inspections and the CDOT-led audits.

### *Daily Stabilization:*

Previous name: Temporary Stabilization

Description: Daily stabilization includes surface roughening or vertical tracking that is conducted at the end of each working day on disturbed areas. This change was incorporated to allow temporary stabilization to match the permit definition and reduce confusion.

### *Temporary Stabilization:*

Previous name: Interim Stabilization

Description: Temporary stabilization shall be implemented in disturbed areas where construction activities permanently or temporarily cease for more than 14 days. This change was incorporated to match the permit definition of temporary stabilization and reduce confusion.

## **Additional Potential Pollutants and Allowable Discharges**

The new CDPS-SCP included new potential pollutants that must be identified and described in the SWMP. These additional potential pollutants include:

1. Wash water and byproducts from masonry operations
2. Reclaimed and potable water used in construction activities, including water used as a dust palliative

The Project Engineer will coordinate with the SWMP Administrator to ensure these additional pollutant sources are documented in the SWMP as described in Section 107.25(b)5 and that appropriate control measures for these additional pollutant sources are implemented.

There were new Allowable Non-Stormwater Discharges added, including:

1. Discharges to the ground of masonry washout water
2. Discharges to the ground of water used to wash vehicles, equipment, and external buildings, provided that those waters do not contain added soaps, solvents, or detergents

These discharges are allowable only under the conditions described in Section 107.25(b)21.

## **SWMP Documentation Changes**

Updates and additions throughout the CDPS-SCP prompted changes to SWMP documentation requirements throughout the Water Quality Specifications. A Cheat Sheet for SWMP Administrators has been developed to address the changes required in each SWMP tab.

The SWMP Cheat Sheet can be found here: [SWMP Changes Cheat Sheet, Revised May 2024](#)



### Discharges of Pollutants Outside of the LOC

Additional language in the CDPS-SCP prompted the clarification that all pollutants discharged outside the Limits of Construction (LOC) must be reclaimed and disposed of properly. If the pollutants discharge outside of CDOT ROW, the Project Engineer will coordinate with the Contractor and property owners to obtain access so that the required remediation activities can occur.

### Vegetative Buffers

The updated CDPS-SCP specifically requires that all vegetative buffers adjacent to state waters be protected by additional upgradient control measures. Language was added to Section 208.03 to meet this requirement for protection of vegetative buffers.

### Form 1176 Inspection Requirements

To conform with CDPS-SCP Inspection timelines, the post-storm inspection requirement was removed. Form 1176 Inspections now must be completed at least every 7 days. Additional language was added to section 208.03(c)2.A(2) to clarify the site conditions which qualify for a Winter Conditions inspection and that Winter Conditions must be documented on the Form 1176.

Additional inspection areas were included in section 208.03(c)2.B to conform with the required inspection areas in the CDPS-SCP. These additional areas include:

1. All disturbed areas, including areas that are temporarily stabilized
2. Locations of pumped stormwater, including all intake and discharge points
3. Staging areas

Form 1176 documentation requirements were revised for clarity and compliance with CDPS-SCP requirements as part of this update. Additions to section 208.03(c)2.C Inspection Documentation included:

1. The Contractor will migrate any findings on a previous Form 1176 Inspection where the corrective action has not been completed to the current Form 1176.
2. The Compliance Certification may only be signed when all corrective actions have been completed or if there are no findings on the Form 1176 Inspection.

A new Form 1176 (May 2024 version) that incorporates these documentation changes is available for the project's use here: [Form 1176, Revised May 2024](#).

### Corrective Action Response Time

The revisions to the CDPS-SCP added a statement that all control measures must be implemented and maintained in effective operating condition and required that all corrective actions be completed immediately. Section 208.03(c)2.D now requires that all control measures that require corrective action must be corrected by the Contractor immediately but



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# Construction Bulletin

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no later than 2 calendar days from the time of observation. This 2-day correction timeline applies to deficiencies found during the normal course of work and to findings documented during a Form 1176 Inspection. The Contractor must address discharges outside of the LOC or spills occurring within the project limits immediately upon observation.

Additionally, the Contractor must now submit an Interim Action Response Plan for all findings identified during a Form 1176 Inspection that cannot be resolved within the 2-day Corrective Action Response Time. This Plan must be approved by the Project Engineer. If the Interim Action Response Plan is not approved by CDOT, the Contractor shall address all findings within the 2-day Corrective Action Response Time. Section 208.03(c)2.D(2) outlines the information required in the Interim Action Response Plan.

### Reporting Requirements

The Noncompliance Reporting section, now 208.03(c)2.E, was updated to require that the Contractor immediately reports all incidences of potential noncompliance to the Project Engineer. This change was implemented to ensure that all incidents of noncompliance are reported to the appropriate entity and through the appropriate reporting channels.

### Questions and Resources

The updated CDPS-SCP as well as fact sheets are posted here:

<https://cdphe.colorado.gov/cor400000-stormwater-discharge>

Additional guidance for SWMP Administrators on the changes required to comply with these changes can be found here: [SWMP Changes Cheat Sheet, Revised May 2024](#)

Please print a copy of this bulletin and keep it with your copy of the Construction Manual. The Construction Manual and Construction Bulletins can be found on the Design and Construction Project Support web page: [https://www.codot.gov/business/designsupport/bulletins\\_manuals](https://www.codot.gov/business/designsupport/bulletins_manuals)

If there are any questions on how to implement these changes on projects, the Project Engineer should coordinate with the Region Water Pollution Control Manager (RWPCM) on their project or contact the Headquarters Water Quality Construction Section.

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