City of Omaha
Environmental Field Guide

CSO!
Clean Solutions for Omaha

August 2019
Third Edition

Cover photo credits: 1. (Far left) Missouri River Water Resource Recovery Facility 2. (Center left) 55th to 64th Saddle Creek Sewer Separation 3. (Center) Saddle Creek 4. (Center right) Barn Swallow – South Interceptor Force Main Project 5. (Background) Missouri River Water Resource Recovery Facility Expansion

Purpose of Environmental Field Guide

The Environmental Field Guide was developed for the City of Omaha's CSO Program as a tool to be used by the Program Management Team, project teams, construction management teams, Environmental Inspectors, and Construction Contractors. It is intended to be a quick reference on a variety of environmental topics that are more fully addressed in the Program's Environmental Plan. The topics that are addressed in the Environmental Field Guide are listed under the Table of Contents. The Environmental Field Guide also includes a Matrix of Responsibility for Environmental Compliance, along with contacts for the CSO Program Compliance Coordinators and subject matter experts if further guidance is needed on any of the topics included. At the end of the Guide are tables where links to information posted by the various permitting authorities are provided.

For general questions regarding the Environmental Field Guide, individuals may contact Pat Nelson, the CSO Program's Manager, at (402) 444-5456.

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Environmental Topic, **Page Number**

Note: *Web references are only included in the electronic version of the Environmental Field Guide.

Air Pollution Control

Covered Activities:	All construction and construction-related activities that generate air pollution, primarily dust from loading, unloading, hauling operations, and originating from soil stock piles
Key Requirements:	■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ Nebraska Administrative Code (NAC) Title 129 – Nebraska Air Quality Regulations ■ City of Omaha Municipal Code, Chapter 41 ■ OSHA's Respirable Crystalline Silica Standard for Construction - https://www.osha.gov/Publications/OSHA3681.pdf
Where to get more information:	Fugitive Dust Control Plan included in the Contractor's Project-specific Environmental Protection Plan (EPP)
Implementation:	■ Enclose, cover, and/or water material stockpiles ■ Minimize dust production in loading, unloading, and material hauling operations (including covering of loads) ■ Water unpaved streets in the construction area and pave or seal construction roads with high-traffic volumes ■ Maintain cleanliness of paved roads; dry brooming is not allowed ■ Do not burn waste materials, rubbish, debris, or any other material on or adjacent to the construction site
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Water truck spraying water

Good street sweeping operation

Noise, Vibration, and Lighting Controls

Covered Activities:	All construction and construction-related activities that generate noise, vibration, or light
Key Requirements:	■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ City of Omaha Municipal Code, Chapter 17 – Noise Control ■ City of Omaha Municipal Code, Chapter 44 – Electricity, Division 5 (Electrical Control)
Where to get more information:	Contractor's Project-specific Environmental Protection Plan (EPP)
Implementation:	■ Ensure construction equipment remains equipped with manufacturer's standard noise-control devices ■ Locate stationary noisy equipment away from construction boundaries that are near noise-sensitive areas ■ Use electric hand tools instead of gas-powered, whenever possible ■ Route construction equipment away from residential streets or along routes with the least impact or as defined in the construction documents ■ Avoid nighttime activities if possible ■ Methods of controlling light pollution include, but are not limited to, the use of conforming luminaires, shielding, landscaping, berms, and directional modification
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Construction with jackhammer

Construction in sunrise or dusk conditions with lights

Construction workers using electric hand tools

State Historic Preservation Office (SHPO) or Nebraska State Historical Society (NSHS) Cultural Resources Evaluation/Clearance

What this clearance authorizes:	Construction work near known surveyed historical or cultural resources. Some projects will have historical and/or cultural resources in or near the construction limits. Examples of historical and cultural resources include a building on the National Register of Historic Places or an Native American burial ground.
Key Requirements:	■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ Complete a Class I Cultural Resource Records search during project design to identify any known historical or cultural resources in the vicinity of the project ■ Will vary depending on the historical and/or cultural resource or lack thereof in the project area, but are generally found along streams and rivers, such as the Missouri River
Where to get more information:	http://nebraskahistory.org/index.shtml
Implementation:	■ Confirm that the construction work is proceeding in accordance with the Nebraska State Historical Society's requirements (e.g., keeping the construction activity a certain distance away from the resource, limiting vibration or other construction disturbance, etc.) ■ In the event that a previously unknown historical or cultural resource is discovered, follow the initial steps shown on Page 6
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Previously Unknown Historical or Cultural Resource Encountered

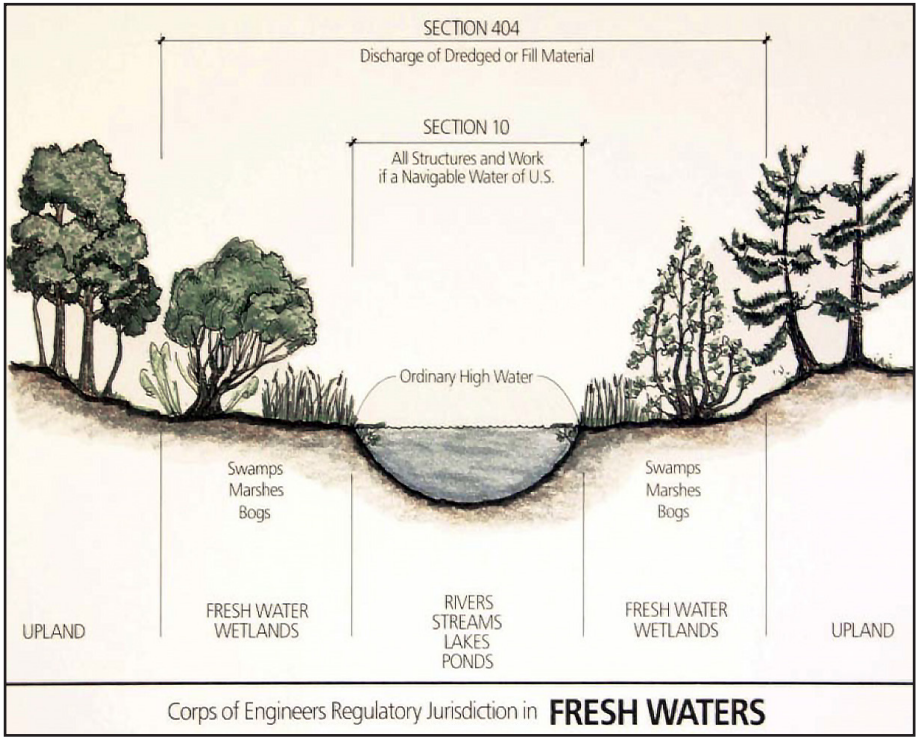
Who do you Contact?	Where to go for Information	What are the Initial Steps?
1. Construction Manager 2. City Project Manager 3. Project Compliance Coordinator	1. Contractor's Environmental Protection Plan (EPP) 2. Environmental Plan, Procedure 8-2: *"Previously Unknown Potential Historic or Cultural Resource Encountered by a Construction Contractor"*	1. Stop work in the immediate area 2. Document the discovery with photographs, sketches, dates, and location information 3. Secure the immediate area

Note: If the discovery appears to include bones of any kind, call 911!

United States Army Corps of Engineers (USACE)
Clean Water Act (CWA) Section 404 Permits (Individual and Nationwide Permits)

What these permits authorize:	■ Work in or impacting Waters of the U.S., including wetlands. Example types of work include pipeline construction, grading and landscaping, mechanized land clearing, placement of fill material, road construction, dam/impoundment construction, levee/dike construction, and pile-supported structures. ■ Waters of the U.S. are determined on a case-by-case basis, but generally include streams, rivers, lakes, channels, gulches, drainage ways, ditches, and wetlands. ■ A graphical depiction of the USACE's jurisdiction is shown on **Page 8**. ■ Examples of Waters of the U.S. (also known as Jurisdictional Waters) are shown on **Page 9**. ■ Initial steps that should be taken in the event of an encroachment into a jurisdictional water without a 404 permit are identified on **Page 10**.
Key Requirements:	In general, construction and disturbance may only include what was permitted, and restoration, revegetation, and monitoring may be required. Many other conditions apply – refer to the conditions of the project permit and, if applicable, the General Conditions of the Nationwide Permit and Nationwide Permits Regional Conditions for Nebraska.
Where to get more information:	■ Contractor's Project-specific Environmental Protection Plan (EPP) ■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ Project Manual, Specification 01 41 26 – Permits
Implementation:	■ Ensure the construction area matches/reflects what was shown in the permit application ■ Ensure construction in/near the feature of interest (e.g., the channel or the wetlands) stays within the limits that were shown in the application and in the contract documents ■ Ensure revegetation/restoration occurs per permit requirements ■ Ensure construction signs indicate the wetland boundary
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

USACE Graphical Depiction of Clean Water Act Section 404 Jurisdiction



Pictorial Representation of Jurisdiction is from the USACE Headquarters website:
http://www.usace.army.mil/CECW/Pages/reg_permit.aspx

According to the U.S. Environmental Protection Agency (EPA) and USACE Clean Water Act Jurisdictional Guidance dated December 2, 2008, Waters of the U.S. (also known as jurisdictional waters) include the following:

- Traditional navigable waters
- Wetlands adjacent to traditional navigable waters
- Non-navigable tributaries that are relatively permanent where the tributaries typically flow year-round or have continuous flow at least seasonally (typically 3 months)
- Wetlands that directly abut such tributaries

These agencies will determine jurisdiction over the following waters based on analysis to determine if there is a significant nexus with a traditional navigable water:

- Non-navigable tributaries that are not relatively permanent
- Wetlands adjacent to non-navigable tributaries that are not relatively permanent
- Wetlands adjacent to but that do not directly abut a relatively permanent, non-navigable tributary.

What is a Jurisdictional Water?

These photos are examples of different classifications of jurisdictional waters that could be encountered on the CSO Program.

Wooded Ravine
Missouri River Water Resource Recovery Facility

Ephemeral Stream
Near Intersection of Center Street and 62nd Street, Saddle Creek Area

Perennial Stream: Little Papillion Creek Saddle Creek Area

Ordinary High Water Mark Along the Missouri River

Encroachment into Jurisdictional Waters Beyond or without a Section 404 Permit

Who do you Contact?	Where to go for Information	What are the Initial Steps?
1. Construction Manager 2. City Project Manager 3. Project Compliance Coordinator	1. Contractor's Environmental Protection Plan (EPP) 2. Environmental Plan, Procedure 8-1: *"Encroachment into Jurisdictional Waters Beyond or Without a Section 404 Permit"*	1. Stop work in the jurisdictional waters (Wetlands or Waters of the U.S.) 2. Secure/Mark in Field the Wetlands and Waters of the U.S. 3. Document information needed per Environmental Plan, Procedure 5-2: *"Communication of Potential Violations (Environmental Incident)"* – Description of what happened – Date and time of incident – Photos – Actions taken

Management of Materials During Construction

Covered Activities:	Cleaning and housekeeping during construction, trash control and sanitation
Key Requirements:	Project Manual, Specification 01 35 05 – Temporary Environmental Controls
Where to get more information:	Contractor's Project-specific Environmental Protection Plan (EPP)
Implementation:	■ Provide covered containers for trash and clean up litter and debris daily ■ Designate material storage areas with secondary containment or covered storage for liquid materials ■ Provide and maintain spill kits on site ■ Provide and maintain secured sanitation facilities in locations away from inlets, drainage facilities, and watercourses
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Well maintained Contractor staging

Appropriate waste management – covered dumpsters with labels (construction vs. municipal)

Drip pans provided for idle equipment

Material Spills During Construction

Who do you Contact?	Where to go for Information	What are the Initial Steps?
1. Construction Manager 2. City Project Manager 3. Project Compliance Coordinator	1. Contractor's Environmental Protection Plan (EPP) 2. Environmental Plan, Procedure 8-3: *"Material Spills During Construction of CSO Project"*	1. Evacuate people in area, secure the perimeter and stop work in the area (if hazardous material or other safety concerns) 2. Safely contain the affected area, if possible – If not, call Douglas County Emergency Management Agency at (402) 444-5040 3. Identify the Area of Impact in the field 4. Document information needed per Environmental Plan, Procedure 5-2: *"Communication of Potential Violations (Environmental Incident)"* – Description of what happened – Date and time of incident – Photos – Actions taken

Contaminated Soil, Groundwater, and Hazardous Materials

Covered Activities:	Soil excavation, groundwater dewatering (covered under Construction Dewatering), and structure demolition
Key Requirements:	■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ CSO Program Materials Management Plan for Soil and Groundwater ■ Nebraska Administrative Code (NAC) Title 117 – Nebraska Surface Water Quality Standards ■ NAC Title 118 – Groundwater Quality Standards and Use Classification ■ NAC Title 128 – Nebraska Hazardous Waste Regulations ■ NAC Title 132 – Integrated Solid Waste Management Regulations
Where to get more information:	Contractor's Project-specific Environmental Protection Plan (EPP)
Implementation:	■ Observe excavation at all times for "Signs of Contamination" presented on **Page 14** ■ If contaminated soil or groundwater or a hazardous material is encountered, follow the initial steps on **Page 14** ■ If known contaminated soil or groundwater is present, manage the materials in accordance with the Contract Documents, including segregation of the contaminated soil, storing the contaminated soil on a plastic liner, and treating the groundwater as required in the Nebraska Department of Environmental Quality (NDEQ) Dewatering Permit and City Dewatering Discharge Permit (if required)
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Signs of Contamination

The following is a list of contaminated or regulated materials and wastes that could be encountered during construction and may include, but are not limited to, the following:

- Industrial wastes including oily materials, sludge, or partially full containers
- Universal wastes (e.g., batteries, fluorescent light bulbs, mercury-containing equipment, pesticides)
- Soil or groundwater that exhibits stains, discoloration, or strong chemical or petroleum odors
- Oil slicks, floating products, or sheen on water
- Buried items such as pipes, tanks, vaults, or sumps
- Rusted barrels, metal drums, glass jars, or other industrial containers
- Oily and tarry residues
- Cinders, ash deposits, or other combustion products
- Buried garbage or refuse
- Unexplained and unnatural stressed/dead vegetation on ground surface

If the "signs of contamination" as described above are observed in the excavation, immediately stop work and follow the initial steps shown below.

Unanticipated Suspected Hazardous Substance Encountered

Who do you Contact?	Where to go for Information	What are the Initial Steps?
1. Construction Manager 2. City Project Manager 3. Project Compliance Coordinator **Note:** If there is a life safety concern, call 911!	1. Contractor's Environmental Protection Plan (EPP) 2. Environmental Plan, Section 9-1: Materials Management Plan 3. Environmental Plan, Section 9-1: Materials Management Plan, OMA CSO Materials Management Plan for Soil and Groundwater, Appendix A, *"Previously Unknown Suspected Hazardous Environmental Condition or Hazardous Waste Encountered by a Construction Contractor"*	1. Stop work in the vicinity of the discovery and evacuate people as necessary 2. Identify, define, and secure the area impacted by the material 3. Safely contain the material, if possible – If not, call Douglas County Emergency Management Agency at (402) 444-5040

Unanticipated Underground Storage Tanks Discovered During Construction

Covered Activities:	Unanticipated underground storage tank (UST) discovered during construction
Key Requirements:	■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ CSO Program Materials Management Plan for Soil and Groundwater ■ Nebraska State Fire Marshall ■ City of Omaha Fire Department (Fire Prevention Bureau) ■ NAC Title 118 - Ground Water Quality Standards and Use Classification and Nebraska ■ NAC Title 126 - Rules and Regulations Pertaining to the Management of Wastes
Where to get more information:	Environmental Plan Procedure 9-6: "*Procedure for Handling Unanticipated Underground Storage Tanks Discovered during Construction of CSO Projects*"
Implementation:	■ Retain the services of a State of Nebraska contractor who holds a current license to close underground storage tanks ■ Observe excavation at all times for "Signs of Contamination" presented on **Page 14** ■ If contaminated soil or groundwater or a hazardous material is encountered, follow the initial steps on **Page 16** ■ If known contaminated soil or groundwater is present, manage the materials in accordance with the Contract Documents, including segregation of the contaminated soil, storing the contaminated soil on a plastic liner, and treating the groundwater as required in the NDEQ Dewatering Permit and City Dewatering Discharge Permit (if required) ■ Coordinate with the Omaha Fire Prevention Bureau, (402) 660-0846
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Leaking UST found during South Interceptor Force Main construction

Unanticipated Underground Storage Tanks Discovered During Construction

Who do you Contact?	Where to go for Information	What are the Initial Steps?
1. Construction Manager 2. City Project Manager 3. Project Compliance Coordinator	1. Environmental Plan, Procedure 9-6: "*Procedure for Handling Unanticipated Underground Storage Tanks Discovered during Construction of CSO Projects*"	1. Stop work in the vicinity of the discovery and immediately notify the Construction Manager 2. If the tank is leaking uncontrollably, immediately call 911 3. Safely contain the affected area, if possible 4. Document pertinent information about the tank: size, contents, associated piping, and visible signs of leakage

City of Omaha – Grading Permit

What this permit authorizes:	Stormwater discharges from construction sites over 1 acre or larger or part of a larger common plan of development; the permit is obtained through the City of Omaha
Key Requirements:	The permit requires control and elimination of sources of pollutants in stormwater through the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP)
Where to get more information:	■ City submittal of inspection reports at time of inspection to www.omahapermix.com ■ Contractor's Project Specific Environmental Protection Plan (EPP) ■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ Project Manual, Specification 01 41 26 – Permits
Implementation:	■ Implement and maintain Construction Stormwater Quality Best Management Practices (BMPs) according to the SWPPP Narrative and Drawings in the contract documents ■ Keep an updated copy of the SWPPP Narrative and Drawings on site and uploaded to City's website ■ Maintain inspection records including documentation of follow-up actions and BMP maintenance activities ■ City Inspector uploads inspection reports to www.omahapermix.com
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Gravel pile with BMP protection

Street sweeping

Construction inlet protection in good condition

NDEQ – National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Discharges

What this permit authorizes:	Stormwater discharges from construction sites 1 acre or larger or part of a larger common plan of development; the permit is obtained through NDEQ
Key Requirements:	The permit requires control and elimination of sources of pollutants in stormwater through the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP)
Where to get more information:	■ http://www.deq.state.ne.us/Publica.nsf/pages/WAT012 ■ Contractor's Project Specific Environmental Protection Plan (EPP) ■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ Project Manual, Specification 01 41 26 – Permits
Implementation:	■ Implement and maintain Construction Stormwater Quality Best Management Practices (BMPs) according to the SWPPP Narrative and Drawings in the contract documents ■ Keep an updated copy of the SWPPP Narrative and Drawings on site and uploaded to City's website ■ Maintain inspection records including documentation of follow-up actions and BMP maintenance activities
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Construction with inlet protection in good condition

Construction "disturbed area" with silt fence properly installed and in good condition

Concrete washout properly designated with secondary containment

NPDES Stormwater Inspection Questions

- Is there a copy of SWPPP on site?
- Are the Notice of Intent (NOI) and construction sign visibly posted at entrance?
- Is the construction site perimeter contained?
- Is offsite tracking minimized/street cleaned?
- Are disturbed areas contained?
- Are equipment wash/maintenance areas, concrete washout areas, stormwater best management practices (BMPs) maintained, and as appropriate, designated on site and in the SWPPP?
- Are good housekeeping practices being used?
- Are inspections occurring as required by the permit?
- Is the person performing the inspections qualified and are their qualifications in the SWPPP?
- Are inspection reports signed and certified by an inspector?
- Are inspection reports retained at the construction project site?
- Have corrective measures been completed within 7 days of inspection?
- Is sediment being discharged off site?

Unexpected Wastewater Discharge or Overflow

Who do you Contact?	Where to go for Information	What are the Initial Steps?
1. Sewer Maintenance 24-hour Dispatch 2. Construction Manager 3. City Project Manager 4. Project Compliance Coordinator	1. Environmental Plan, Procedure 5-4: "*Reporting and Public Notification of Dry Weather Sewer Overflows and Bypasses*"	1. Report discharge or overflow immediately to Sewer Maintenance 24-hour Dispatch with: – Locale: Intersection or address – Time of discovery & duration – Cause for discharge or overflow (if known) – Flow Description (type/color/gpm) – Reached water body or potential exposure to the Public – Mitigation efforts 2. Coordinate with Contractor and Sewer Maintenance to end or contain wastewater ASAP. **City of Omaha Public Works Department: Main Office: 402-444-5220** **City of Omaha Sewer Maintenance 24-hour Dispatch: 402-444-4919**

Sanitary Sewer Overflow or Dry-Weather CSO event

Note: A bypass is defined as the "diversion of wastes from any portion of the wastewater collection or treatment facilities." The following are examples of unauthorized bypasses:

– Discharge from a sewer line causing sewage release to the ground surface, storm sewer, or surface water

– Overflow or bypass of sewage at a pumping station or at a Water Resource Recovery Facility (WRRF)

– Bypassing of any portion of the WRRF that would normally be online

– Whether planned or unplanned, whenever sewage leaves its intended vessel of containment (including, but not limited to, tanks, pipes, pumps, hoses, or channels), even if it does not reach a water body, constitutes a reportable SSO or bypass violation to NDEQ and must be reported to NDEQ

NDEQ – NPDES "CLEAN" Construction Dewatering Discharge Permit (NEG671000)

What this permit authorizes:	Ground and surface water discharges from construction dewatering excavations, foundation sumps, utility vaults, and wells to nearby waterways; water discharged must be groundwater (or groundwater mixed with storm water) from sites with no known groundwater contamination; the permit is obtained through NDEQ
Key Requirements:	■ Effluent limitations and monitoring requirements, details on implementation of energy dissipation, reporting and recordkeeping requirements, management requirements, and operation and maintenance conditions ■ Submit Discharge Monitoring Reports (DMRs) as required by the permit conditions, typically either monthly or quarterly
Where to get more information:	■ http://www.deq.state.ne.us/Publica.nsf/pages/WAT179 ■ Contractor's Project-specific Environmental Protection Plan (EPP) ■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ Project Manual, Specification 01 41 26 – Permits ■ Project Manual – Control of Groundwater and Surface Water specification; specification section varies by project
Implementation:	■ Monitor that the discharge is complying with the approved permit limits and location/method/manner of discharge specified in the application ■ Keep a log of dewatering activities and sample analytical results
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Examples of “Clean” Dewatering Operations

Dewatering system with wells and manifold for pipeline construction

Erosion control at the discharge point with filter bags, jurisdictional wetlands in background

Construction dewatering operation with BMPs

Dewatering discharge to approved offsite location

NDEQ – General NPDES "DIRTY" Construction Dewatering Discharge Permit (NEG673000)

What this permit authorizes:	Dewatering discharges that eventually discharge to the Missouri River within the City of Omaha from contaminated sites such as construction excavations, foundation sumps, or utility vaults; the permit is obtained through NDEQ
Key Requirements:	■ Effluent limitations and monitoring requirements for pollutants specific to each site are based on groundwater data from the immediate area; typical pollutants include metals, petroleum products, herbicides, pesticides, and organics ■ Include details on implementation of energy dissipation, reporting, and recordkeeping requirements, management requirements, and operation and maintenance conditions ■ Submit Discharge Monitoring Reports (DMRs) as required by the permit conditions, typically monthly
Where to get more information:	■ Search for NDEQ NEG673000 on the internet for permit and conditions ■ Contractor's Project-specific Environmental Protection Plan (EPP) ■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ Project Manual, Specification 01 41 26 – Permits ■ Project Manual – Control of Groundwater and Surface Water specification; specification section varies by project.
Implementation:	■ Monitor that the discharge is complying with the approved permit limits and location/method/manner of discharge specified in the application ■ Keep a log of dewatering activities and sampling and analytical results
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Examples of “Dirty” Dewatering Operations

A stilling basin and energy dissipating rock outfall for a site discharging a large volume of construction dewatering water to a sensitive water

City of Omaha – Construction Dewatering Discharge Permit (for Effluent discharged to Combined or Sanitary Sewer)

What this permit authorizes:	Discharges from dewatering construction excavations, foundation sumps, utility vaults, and wells. Water discharged must be groundwater (or groundwater mixed with stormwater) and directed to the City of Omaha combined or sanitary sewer; this permit is obtained through the City of Omaha
Key Requirements:	■ An NPDES Dewatering Permit must be obtained from NDEQ before discharging to the combined or sanitary sewer ■ Include effluent limitations and monitoring requirements, reporting and recordkeeping requirements, management requirements, and operation and maintenance conditions ■ Submit DMRs, Contractor Dewatering Log, and Laboratory Analytical Reports on a quarterly basis to the City ■ Additional restrictions may be included regarding wet weather discharges
Where to get more information:	■ Contractor's Project-specific Environmental Protection Plan (EPP) ■ Project Manual, Specification 01 41 26 – Permits ■ Project Manual – Control of Groundwater and Surface Water specification; specification section varies by project ■ Environmental Plan, Procedure 7-13: *"Construction Dewatering Discharge Permitting"*
Implementation:	■ Monitor that the discharge is complying with the approved permit limits and location/method/manner of discharge specified in the application ■ Keep and update a log of dewatering activities and sample analysis results
Who to contact for further information:	Construction Manager, City Project Manager, Project Compliance Coordinator, or City of Omaha – Environmental Quality Control, (402) 444-3908

Construction Dewatering Discharge Permitting

Who do you Contact?	Where to go for Information	What are the Initial Steps?
1. Construction Manager 2. City Project Manager 3. Project Compliance Coordinator	1. Contractor's Environmental Protection Plan (EPP) 2. Environmental Plan, Procedure 7-13: *"Construction Dewatering Discharge Permitting"*	1. If discharging to any City sewer, obtain City's permission to discharge to City's system 2. Submit NOI to NDEQ (after review by Construction Manager and Compliance Coordinator) 3. Keep NDEQ authorization letter and general permit and City Authorization, if applicable, on site 4. During dewatering discharge operations, observe, sample, and perform monitoring in accordance with NDEQ permit terms and City requirements (for discharges to City system) 5. Submit DMRs to NDEQ and the City (along with Contractor Dewatering Log and analytical laboratory reports) – DMR must be filed, even if there is no discharge for the reporting period

NDEQ – NPDES Hydrostatic Testing Discharge Permit

What this permit authorizes:	Hydrostatic testing discharge to be land applied or discharged into surface waters; the permit is obtained through NDEQ
Key Requirements:	■ Include effluent limitations and monitoring requirements, details on implementation of energy dissipation "methods" or "measures," reporting and recordkeeping requirements, management requirements, and operation and maintenance conditions ■ Submit DMRs on a quarterly basis
Where to get more information:	■ http://www.deq.state.ne.us/Publica.nsf/pages/WAT180 ■ Contractor's Project-specific Environmental Protection Plan (EPP) ■ Project Manual, Specification 01 35 05 – Temporary Environmental Controls ■ Project Manual, Specification 01 41 26 – Permits
Implementation:	■ Monitor that the discharge is complying with the approved permit limits and location/method/manner of discharge specified in the application ■ Perform qualitative examination of the discharge—turbidity, color, odor, evidence of hydrocarbons, sheen, films, foam, and floating solids—at the frequency required in the permit conditions
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Hydrostatic Testing Discharge Permitting

Who do you Contact?	Where to go for Information	What are the Initial Steps?
1. Construction Manager 2. City Project Manager 3. Project Compliance Coordinator	1. Contractor's Environmental Protection Plan (EPP)	1. If discharging to any City sewer, obtain City's permission to discharge to City's system 2. Submit NOI to NDEQ (after review by Construction Manager and Compliance Coordinator) 3. Keep NDEQ authorization letter and general permit on site 4. During discharge operations, observe, sample, and perform monitoring in accordance with NDEQ permit terms and City requirements (for discharges to City system) 5. Submit DMRs to NDEQ and the City (along with contractor Dewatering Log and analytical laboratory reports) – DMR must be filed, even if there is no discharge for the reporting period

Migratory Bird Treaty Act (MBTA)
Endangered Species Act (ESA)

MBTA Overview:	Specific provisions in the statute include a Federal prohibition to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention … for the protection of migratory birds … or any part, nest, or egg or any such bird."
ESA Overview:	The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened.
Key Requirements:	Conduct pre-construction surveys to identify raptor, eagle, and migratory bird nesting and other threatened and endangered species habitats. Controls implemented will vary depending on the species identified in pre-construction surveys, location, and seasonal activities.
Where to get more information:	■ http://www.fws.gov ■ http://outdoornebraska.gov/endangeredspecies/ ■ http://rarespecies.nebraska.gov/species/
Implementation:	■ Monitor that the work is not impacting any migratory birds (including eggs, young, and active nests). ■ Ensure any controls needed to protect migratory birds or threatened and endangered species habitats are implemented per the recommendations of the pre-construction survey.
Who to contact for further information:	Construction Manager, City Project Manager, or Project Compliance Coordinator

Examples of Protected Wildlife Species Known to Occur in the Area

Pallid Sturgeon

Least Tern

American Ginseng

Northern Long-Eared Bat

Migratory Bird and Northern Long-Eared Bat Protection

Who do you Contact?	Where to go for Information	What are the Initial Steps?
1. Construction Manager 2. City Project Manager 3. Project Compliance Coordinator	1. Contractor's Environmental Protection Plan (EPP) 2. 01 35 05, Temporary Environmental Controls Specification for seasonal constraint 3. Environmental Plan, Procedure 7-15: "*CSO Migratory Bird Protection Procedure*"	**Migratory Bird Protection** 1. Clear (remove) trees identified during nesting survey for removal outside of nesting season or after confirmation of no active nests. Nesting season is typically from March 1 through August 31, but may be longer depending on the species. 2. If active nest is found, stop work in area and maintain buffer (as defined by wildlife biologist until young have fledged). 3. Periodically monitor construction area for active nests, report to Construction Manager any active nests found. 4. Remove inactive nests immediately or contact Construction Manager. **Northern Long-Eared Bat** 1. Clear (remove) trees identified during habitat survey for removal outside of the maternity roosting period or after confirmation of no active roosts. The maternity roosting period is typically from June 1 to July 31, but may be longer depending on the species. 2. If an active roost is found, stop work in area and maintain buffer (as defined by the wildlife biologist until the roost is cleared). 3. Continue to monitor the construction area for signs of potential habitat, report to Construction Manager if any are found.

Matrix of Responsibilities for Environmental Compliance

	City PM	CC	CM	ECO Contractor	EI	CI	PMT
Develop compliant designs	P	S	S	-	-	-	S
Provide regulatory/compliance guidance and support	-	P	-	-	-	-	S
Obtain Owner permits	P	S	S	-	-	-	S
Obtain Contractor permits	-	S	S	P	S	S	-
Internal pre-construction coordination	S	P	S	-	S	S	-
Pre-Construction Environmental Conference	S	P	S	S	S	S	-
Implement permit requirements and environmental controls	-	S	S	P	S	S	-
Onsite day-to-day compliance monitoring	S	S	S	S	S	P	-
Onsite compliance oversight	S	S	P	S	S	S	-
Direction to the Contractor	S	S	P	-	S	S	-
Routine and As-Required Environmental Inspections	S	S	S	S	P	S	-
Environmental Close-Out Conference	S	P	S	S	S	-	-
Project Close-Out	P	S	S	S	S	S	S
Maintain permitting and compliance records for Contractor	-	S	S	P	S	S	-
Maintain permitting and compliance records for CSO Program	S	P	S	S	S	S	S

Key:

City PM: City Project Manager
CC: Compliance Coordinator
CI: Construction Inspector
CM: Construction Manager
ECO: Environmental Compliance Officer
EI: Environmental Inspector
P: Primary Responsibility
PMT: Program Management Team
S: Support Role

See Environmental Plan, Section 3-1 for further information regarding each of these roles.

PMT Compliance Coordinators

Compliance Coordinator	Phone	E-mail
Pat Nelson*	(402) 444-5456	pat.nelson@jacobs.com
Kay Dry	(720) 286-5359	kay.dry@jacobs.com
Quinn Damgaard	(402) 399-1041	quinn.damgaard@hdrinc.com
Lianne Daugherty	(402) 609-7539	lianne.daugherty@jacobs.com
Ben Fisher	(402) 926-7130	benjamin.fisher@hdrinc.com
Emily Holtzclaw	(402) 609-7510	emily.holtzclaw@jacobs.com
Tiffany McEachen	(720) 286-5066	tiffany.mceachen@jacobs.com
Rachel Saunders	(402) 609-7516	rachel.saunders@jacobs.com

*Pat Nelson is the default compliance coordinator for upcoming CSO projects unless/until they are assigned out to other compliance coordinators.

Notes:

1. General contact information is provided here. Compliance Coordinator project assignments may be found on the CSO Portal.
2. For project-specific information, refer to the Contractor's Environmental Protection Plan.
3. Refer to the Environmental Plan, Section 5: Communication Plan for various guidance regarding regulatory agency communications.

Key City and PMT Contacts for Additional Information/Expertise by Topic/Subject Area

Topic/Subject	City Contact(s)	Phone	PMT Contact(s)/ Resource	Phone
404 Permits	--	--	Pat Nelson* Emily Holtzclaw Tiffany McEachen	(402) 444-5456 (402) 609-7510 (720) 286-5066
Wetlands Delineations/ Boundaries	--	--	Ben Fisher Ryan Walkowiak Bill Sigler	(402) 926-7130 (402) 609-7526 (402) 399-1309
Contamination or Suspected Hazardous Waste	--	--	Kay Dry	(720) 286-5359
Historic/Cultural Resource Discoveries/ Issues	--	--	Rachel Saunders Kay Dry	(402) 609-7516 (720) 286-5359
Birds, T&E Species, Wildlife	--	--	Bill Sigler Ben Fisher Ryan Walkowiak	(402) 399-1309 (402) 609-7526 (402) 609-7526
Air Permits	Dan May Tim Burns	(402) 444-6015	Pat Nelson	(402) 444-5456
Levee Concerns	Jim Theiler Jake Hansen	(402) 444-5107	Pat Nelson	(402) 444-5456
Railroad Concerns	Adam Wilmes	(402) 444-3819	Pat Nelson	(402) 444-5456
EPA Lead Remediation	--	--	Kay Dry	(720) 286-5359
Construction Dewatering Discharge Permit	Ron Bartlett	(402) 444-3915 x1113	Pat Nelson	(402) 444-5456
Construction Stormwater Discharge Permit	Andy Szatko	(402) 444-3915 x1101	Pat Nelson Tiffany McEachen	(402) 444-5456 (720) 286-5066

Permit Applications and Terms and Conditions Web Reference Chart

Permitting Authority	Permit Name	Permittee	Applicability	Terms and Conditions Link
USACE	CWA Section 404	City of Omaha	See Environmental Plan, Guidance 7-6, Section 1.1 for relevance to Omaha CSO	http://www.usace.army.mil/Missions/CivilWorks/RegulatoryProgramandPermits/NationwidePermits.aspx
USACE	Certification of No Impact to an FRRP	City of Omaha	See Environmental Plan, Guidance 7-6, Section 1.2 for relevance to Omaha CSO	Not found online
FEMA	Conditional Letter of Map Revision (CLOMR)/ (LOMR)	City of Omaha	Required for development that results in a change to the regulated 100-year floodway or flood plain	http://www.fema.gov/national-flood-insurance-program-2/letter-map-revision
NDEQ	CWA Section 401 WQ Certification	City of Omaha	Blanket certification provided for all Nationwide 404 permits	http://deq.ne.gov/NDEQProg.nsf/OnWeb/S401
NDEQ	NPDES Construction Storm Water Discharge Permit	City of Omaha	Required for any construction project disturbing one acre or more or part of a larger common plan of development	http://deq.ne.gov/publica.nsf/pages/WAT012
NDEQ	General (NPDES) Construction Dewatering Discharge Permit	Contractor	Required for any discharges from construction excavations or dewatering wells	For "dirty" dewatering sites: Search on the Internet for NDEQ NEG673000 (contaminated sites) For "clean" dewatering sites: http://deq.ne.gov/Publica.nsf/pages/WAT179

Note: General information regarding these permits is provided in the Environmental Plan, Section 7-6: "*Overview of Permits Likely Needed for the Implementation of the LTCP.*"

Permit Applications and Terms and Conditions Web Reference Chart

Permitting Authority	Permit Name	Permittee	Applicability	Terms and Conditions Link
City of Omaha	Construction Dewatering Discharge Permit	Contractor	Discharges from dewatering construction excavations, foundation sumps, utility vaults, and wells; water discharged must be groundwater (or groundwater mixed with stormwater) and directed to the City of Omaha combined or sanitary sewer	Not found online
NDEQ	Construction Permit Wastewater Works	City of Omaha	Required for construction or modification of a wastewater treatment or collection system	http://deq.ne.gov/NDEQProg.nsf/OnWeb/WEM
City of Omaha – Air Quality Control	Air Operating Permit	City of Omaha	Required for all emission points at a facility that meet the threshold for either a major or minor source Major source: Potential to emit any air pollutant in quantities greater than 100 tons/year (tpy), 10 tpy of any one Hazardous Air Pollutant (HAP) or 25 tpy of a combination of HAPs and 5 tpy of lead	https://publicworks.cityofomaha.org/air-quality-control/permitting-programs/operating-permit-program
			Minor source: the potential to emit below the major source criteria, but have actual emissions more than 50 tpy of PM_{10}, NOx, SOx, VOC, or CO; 5 tpy of any one HAP or 12.5 tpy of a combination of HAPs; and 2.5 tpy of lead	http://deq.ne.gov/NDEQProg.nsf/OnWeb/AirOPP
NDEQ	NPDES Process Water Discharge Permit	City of Omaha	Construction of stormwater or deep tunnels, due to chemicals that may be used to promote settling	http://deq.ne.gov/NDEQProg.nsf/OnWeb/NPDES
Nebraska Department of Trans-portation (NDOT)	Utilities/ROW Occupation Permit	City of Omaha	Required for any construction within federal or state highway right-of-way	https://dot.nebraska.gov/business-center/permits/row/

Note: General information regarding these permits is provided in the Environmental Plan, Section 7-6: "*Overview of Permits Likely Needed for the Implementation of the LTCP.*"

Permit Applications and Terms and Conditions Web Reference Chart

Permitting Authority	Permit Name	Permittee	Applicability	Terms and Conditions Link
NDOT	NDOT Access Permit	City of Omaha	Required for any temporary or permanent access to a federal or state highway right-of-way	https://dot.nebraska.gov/business-center/permits/row/
Nebraska State Historical Society (NHS)	Cultural Resources Evaluation/ Clearance	City of Omaha	Requirement triggered by issuance of a federal permit, license, or approval, such as 404 permit	https://history.nebraska.gov/historic-preservation
Nebraska Department of Natural Resources (NDNR)	Water Well Permit	Contractor	State law requires any person who constructs a water well to register it and provide certain information collected during the installation of the well	https://dnr.nebraska.gov/groundwater/
City of Omaha	Building, Electrical, Mechanical and Plumbing Permits	Contractor	Required for any new building construction or renovation that includes repairs over $500, antennas or towers, retaining walls over 6 feet tall, as well as electrical, mechanical, or plumbing improvements	https://permits.cityofomaha.org/
City of Omaha	Wrecking Permit	Contractor	Required for any structure demolished	https://publicworks.cityofomaha.org/images/air_quality/I-WANT-TO-TEAR-DOWN-A-BUILDING.pdf
City of Omaha/ Papillion Creek Watershed Partnership (PCWP)	Floodplain Use Permit	City of Omaha	Required for any development within a designated floodplain	https://permits.cityofomaha.org/
City of Omaha/ PCWP	Grading and Erosion Control Permit	City of Omaha	Required for any construction project disturbing one or more acre or part of a larger common plan of development	https://omahastormwater.org/development/construction

Note: General information regarding these permits is provided in the Environmental Plan, Section 7-6: "*Overview of Permits Likely Needed for the Implementation of the LTCP.*"

Permit Applications and Terms and Conditions Web Reference Chart

Permitting Authority	Permit Name	Permittee	Applicability	Terms and Conditions Link
City of Omaha/ PCWP	Post Construction Storm Water Management Plan (PCSMP) Approval	City of Omaha	See Environmental Plan, Guidance 7-6, Section 4.5 for relevance to Omaha CSO	https://omahastormwater.org/development/post-construction/
Papio-Mo. River Natural Resources District (NRD)	Easement Agreement for Occupation of Levee/Channel Right-of-Way	City of Omaha	Required for any improvements to be constructed within the levee and channel improvements owned by Papio-Mo. River NRD	https://www.papionrd.org/contact/forms-and-applications/
Papio-Mo. River NRD	Access Permit for Occupation of Levee ROW	City of Omaha	Required for any improvements to be constructed within the levee and channel improvements owned by Papio-Mo. River NRD	https://www.papionrd.org/contact/forms-and-applications/
BNSF Railway Company	License Agreement	City of Omaha	Required for constructing or repairing utilities located within BNSF right-of-way	http://www.bnsf.com/about-bnsf/faqs.html
BNSF Railway Company	Temporary Occupancy Permit	City of Omaha	Required to access BNSF right-of-way for surveys, geotechnical work, and construction activities	http://www.bnsf.com/about-bnsf/faqs.html
Union Pacific Railroad	Pipeline Crossing/ Encroachment License Agreement	City of Omaha	Required for the installation or repair of a utility located within UPRR right-of-way	https://www.up.com/real_estate/utilities/pipeline/index.htm
Union Pacific Railroad	Right of Entry Agreement	City of Omaha	Required to access UPRR right-of-way for surveys, geotechnical work, and construction activities	https://www.up.com/real_estate/utilities/pipeline/index.htm

Note: General information regarding these permits is provided in the Environmental Plan, Section 7-6: "*Overview of Permits Likely Needed for the Implementation of the LTCP.*"