



# FAQs: 401 Certification Turbidity Monitoring Requirements

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Applicable to EPA's 2017 Construction Stormwater General Permit (CGP)

**If there is no discharge from my site and all of my best management practices are operating effectively, do I still need to conduct turbidity monitoring?**

No.

**When am I required to conduct turbidity monitoring?**

Turbidity monitoring is required during construction activities and thereafter on days when there is a direct discharge of pollutants from an unstabilized portion of the site which is causing a visible plume to a water of the United States. *A construction site is not stabilized per Part 2.2.14 of the Construction General Permit (CGP).*

**Why is monitoring required?**

Section 401 of the Clean Water Act requires the state to review federal permits to ensure that they comply with state water quality standards. Idaho water quality standards require that turbidity "shall not exceed background turbidity by more than fifty (50) NTU instantaneously or more than twenty-five (25) NTU for more than ten (10) consecutive days" (IDAPA 58.01.02.250.02.e). Monitoring is required to ensure that the turbidity standard is met. The following *steps should be followed to ensure compliance with the turbidity standard:*

- 1) If a visible plume is observed, quantify the plume by collecting turbidity measurements from within the plume and compare the results to Idaho's instantaneous numeric turbidity criterion (50 NTU over the background). The appropriate location to collect measurements within the plume is as close to the discharge point as is practicable. The downstream sample must be taken immediately following the upstream sample in order to obtain meaningful and representative results.
- 2) If downstream turbidity is less than 50 NTU greater than the upstream (background) turbidity; continue monitoring as long as the plume is visible.
- 3) If downstream turbidity exceeds upstream (background) turbidity by more than 50 NTU at any time, stop all earth disturbing construction activities and proceed as follows:
  - a) Take immediate action to address the cause of the exceedance. That may include inspecting the condition of project BMPs. If the BMPs are functioning to their fullest capability, then the permittee must modify project activities and/or BMPs to correct the exceedance.
  - b) Notify the appropriate DEQ regional office within 24 hours.
  - c) Increase monitoring frequency until state water quality standards are met. An increase in monitoring could result in sooner resumption of construction activities.
  - d) Once turbidity is less than 50 NTUs above background resume construction activities. See step 2.

**If I discharge to a ditch, canal, or some other man-made water body, am I still responsible for conducting turbidity monitoring?**

The permittee is responsible for obtaining permission to discharge to a man-made water from the owner/operator of the conveyance system.

**What if I am discharging to a waters of the U.S. through a storm drain?**

DEQ's certification does not require the operator to monitor discharges entering a storm drain or at a storm drains outfall. That said, the operator should contact the owner of the storm sewer system to obtain permission to discharge to their system (ex. MS4, city, or county).

**What if no accessible upstream/downstream monitoring locations exist? Would visual monitoring be acceptable in these instances?**

If there is a situation where the operator cannot access the desirable monitoring location, they would be expected to access the nearest accessible point possible. Visual monitoring is not acceptable when there is a discharge to waters of the United States. Monitoring data is needed in order to determine whether you are meeting the numeric standard of 50 NTU instantaneously and 25 NTU for more than ten consecutive days over the background turbidity.

For questions or concerns regarding the information contained in this FAQ sheet, please contact Nicole Deinarowicz, 401 Program Coordinator, at (208) 373-0591 or at [nicole.deinarowicz@deq.idaho.gov](mailto:nicole.deinarowicz@deq.idaho.gov)