Realty Compliance Department

Supplier/Contractor Vetting and Management
Contract Management
Real Estate Transaction Audit
Environmental, Health & Safety
Stormwater Compliance
Contractor Compliance
True compliance is the result of creating a culture of always doing the right thing!
Culture of Compliance

Commitment at the Top
Communicate Expectations
Regulatory Tracking
The Walmart Way – The Right Way, Every Day!

Culture of Compliance
Federal & State Regulatory Monitoring
Standard SWPPP Template
SWPPP Review Prior to Bid
Systematic Permit Management
Contractor Training
The Walmart Way – The Right Way, Every Day!

“SWPPP trained” Superintendents
SWPPP Preconstruction Mtgs.
BMP Certifications
Inspections
Compliance Monitoring
Pre-NOT Inspection
SWPPP Template based on Federal CGP

- Plan Sheet SWPPP Template
- SWPPP Specification Template
- Based on the Federal Construction General Permit (CGP)
- Civil Engineering Consultants are required to upgrade to any local or state permit requirements that are above the CGP
Systematic Project Permit Management

Review SWPPPs for compliance prior to project bid
Ensure proper NOI and permit documentation
File NOI for permits to be held by WMT
Track WMT & GC NOIs, Permits & NOTs
Tack required Agency Submittals (WMT & GC)
Training

Compliance Conference
Superintendent & Project Manager Training (one-time full-day live in Bentonville)

Stormwater Compliance Training
(6 hrs. online + Exam Renewed Annually)

Must also satisfy any local or state training requirements
SWPPP Review prior to project bid
Engineer Uploads Documents
### SWPPP Review

#### Phase I Site Map

**NOTE TO REVIEWER:** Use this tab to include comments about site maps associated with mass grading. Use this tab whether there is only Phase I or additional Phases are present (e.g. Phase II, Phase III, etc.)

<table>
<thead>
<tr>
<th>Item</th>
<th>Requirement</th>
<th>Compliance</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>88.</td>
<td>Legend provided.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>89.</td>
<td>All BMPs used are in Legend.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>90.</td>
<td>One (1) Inlet Protection BMP specified per inlet location per phase.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>91.</td>
<td>BMPs specified on the Site Maps are provided on the Detail Sheet(s).</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>92.</td>
<td>There are no pond inlets (pipes, etc.) located within 30 feet of pond discharge points (no short-circuiting) unless baffles or similar are provided.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>93.</td>
<td>You have a catch basin to the sediment basin #2 referring to it as a sediment trap. Correct the nomenclature.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>94.</td>
<td>Topographical contours are clear and legible on all Site Maps.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>95.</td>
<td>Drainage direction arrows with 1% slope provided.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>96.</td>
<td>Limits of Disturbance clearly identified (bold line type).</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>97.</td>
<td>All land disturbing activities (i.e., grading, clearing, material storage, stockpile, construction piling, construction work and mobile trailer areas and BMPs) are located within L00.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>98.</td>
<td>Outfalls labeled with Receiving Water information provided.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>99.</td>
<td>Since the diversion ditch on the western portion of the site is located well within the limits of disturbance, you should label its outfall location since there is commingling of off-site run-on with on-site runoff.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>100.</td>
<td>Building footprint provided and labeled 'Provisional Building Footprint' or similar.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>101.</td>
<td>Proper perimeter controls provided.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>102.</td>
<td>Proper perimeter stabilization measures appropriate for site, and slope stabilization noted on slopes greater than 1:1.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>103.</td>
<td>Are you sure the northern diversion ditch used to prevent run-on doesn't need to extend the entire perimeter? Around d-15 it looks like you may have a potential for run-on.</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>104.</td>
<td>Silt fence is not used vertically on steep slopes or has hooks or check dams to prevent</td>
<td>Y</td>
<td>N</td>
</tr>
</tbody>
</table>
Post Review Engineer Certifications
Projects

Develop a SWPPP

Communicate Expectations

Implement the SWPPP
Build per Plans and Specs

Inspect the Site & Documentation

Repair and Maintain BMPs

Update the SWPPP
SWPPP Development

Permit Requirements
  SWPPP content
  Site Procedures

Sequence & Phasing

System of BMPs & Management
  Practices to control runoff and minimize discharge of pollutants

Inspection and Maintenance Requirements
Communicate Expectations

- Trainings
- Pre-Bid Meetings
- SWPPP preconstruction meetings
- Signage around site
- Weekly SWPPP Meetings
Implement the SWPPP

Install stable construction exit & trackout control devices *(Barricade other potential exits)*

Install downstream perimeter sediment control BMPs

Install & Stabilize sediment traps & sediment basins

Install & Stabilize runoff controls
Implement the SWPPP

Follow the SWPPP sequence
Stay within the Limits of Disturbance
Inspect and Maintain BMPs
Modify the SWPPP as necessary
Stabilize throughout construction
General Information

Site Name: 
Latitude: 
Longitude: 
Address: 
City: 
Country: United States 
State: Texas 
Zip Code: 
Square Footage: 106933

Questions

<table>
<thead>
<tr>
<th>Best Management Practices Certification</th>
<th>Acknowledgements of Understanding</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The Limits of Disturbance (LOD) has been completely, and properly, marked by staking, flagging or other conspicuous markings.</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>
Inspections

GC Project Superintendent
Routine Inspections

WMT Construction Manager
Attends Inspection Monthly
Inspect what you expect

Walk the Site Perimeter

Look for Damaged BMPs and Maintenance Needs

Look for Sediment (or other Pollutants) and Construction Activity Outside the Permitted Limits of Disturbance
Inspect what you expect

Inspect each Installed BMP
Verify Installation per Plans
Identify BMP Maintenance, Repair and Modification Needs
Identify Areas where Additional or Different BMPs are Necessary
It’s not just about erosion and sediment control

Inspect Material Handling and Storage Areas

Inspect Spill Response & Clean Up Kits

Inspect Equipment Maintenance Areas
Inspection

Waste Management and Recycling Areas
Organize SWPPP & Permit Documentation

Document Inspections

Document Deficiencies & Resolutions

Update the SWPPP
  BMP Installation & Removal
  BMP Additions & Changes
21 Tab Site SWPPP Binder

Project SWPPP Team

Permit Documentation (WMT & GC)

SWPPP Certifications

Off-site Import/Export locations information

Subcontractor List & Certifications

SWPPP Implementation Log

Required Reporting & Documentation
### Online Inspection Reporting

The image shows a screenshot of an online inspection reporting system. The system includes a table with columns for **Due Date**, **Form Name**, **Status**, **Submitted Date**, and **Submitted by**. The entries from the table are as follows:

<table>
<thead>
<tr>
<th>Due Date</th>
<th>Form Name</th>
<th>Status</th>
<th>Submitted Date</th>
<th>Submitted by</th>
</tr>
</thead>
<tbody>
<tr>
<td>11/17/2014</td>
<td>SWPPP Inspection (Daily)</td>
<td>Open</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11/27/2014</td>
<td>CM SWPPP Inspection Certification</td>
<td>Open</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11/14/2014</td>
<td>SWPPP Inspection (Daily)</td>
<td>Completed</td>
<td>11/14/2014</td>
<td>Kris Densman</td>
</tr>
<tr>
<td>11/13/2014</td>
<td>SWPPP Inspection (Daily)</td>
<td>Completed</td>
<td>11/13/2014</td>
<td>Kris Densman</td>
</tr>
<tr>
<td>11/12/2014</td>
<td>SWPPP Inspection (Daily)</td>
<td>Completed</td>
<td>11/12/2014</td>
<td>Kris Densman</td>
</tr>
<tr>
<td>11/10/2014</td>
<td>SWPPP Inspection (Daily)</td>
<td>Completed</td>
<td>11/10/2014</td>
<td>Kris Densman</td>
</tr>
<tr>
<td>11/7/2014</td>
<td>SWPPP Inspection (Daily)</td>
<td>Completed</td>
<td>11/7/2014</td>
<td>Kris Densman</td>
</tr>
</tbody>
</table>
Automated Deficiency & Resolution Tracking

• Deficiencies identified by GC on inspection report

• Resolution Task Creation required

• Task Resolution required within 24 hrs.
Automated Email Notifications

- Missed Inspections
- Overdue Deficiency Resolution
- Long Running Deficiency Alerts
- Construction Manager Inspection Reminders
Online Incident Reporting

• Chemical or Petroleum Spills
• Sediment Release
• Safety Incidents
• Regulatory Agency Contact
Communication on site
Communication & Documentation

In the Jobsite Office

Training Certificates
Site Maps
BMP Details
SWPPP Binder
Communication

Weekly Meetings with All Subcontractors

Discuss Compliance Issues

Reinforce Requirements

Discuss Upcoming Work and how it Impacts SWPPP compliance
Pre-NOT Process

• Once construction is complete & site is stabilized, the engineer inspects the site

• Required site photo documentation

• Engineer Report & Certification

• Report submitted for review and concurrence by Walmart Stormwater Team

• Reporting system set for final CM inspection
Stabilize Site and Terminate Permit
Acres for America Program

- Walmart created Acres for America in 2005 in partnership with the National Fish and Wildlife Foundation (NFWF)
- $35 million commitment to purchase and preserve 1 acre of habitat for every acre of land we develop.
- To date nearly 700,000 acres protected
- 45 projects in 26 states
- Leveraging an additional $250M in matching funds
- Connected over 7 million protected acres (an area larger than Maryland and Delaware combined)
Key Take Aways

Culture of Compliance  
*(The Right Way, Every Day!)*

Communicate Expectations

Know & Understand the Permit(s)

Develop a SWPPP

Implement the SWPPP  
*(Stay within the limits!)*

Inspect and Maintain BMPs

Update & Adjust the SWPPP

Document in Detail, Document Accurately

Communicate Clearly, Communicate Often
The Right Way, Every Day!

THANK YOU!!

QUESTIONS?
Contact Information

Mark S Goldsmith, CPESC
Sr. Director Realty Compliance

Wal-Mart Stores, Inc
2001 SE 10th Street, Mail Stop 5570
Bentonville, AR 72716-5570

Mark.Goldsmith@Walmart.com
(479) 204-3314