

Colorado NPDES Storm Water Inspection - Construction

NATIONAL DATABASE INFORMATION	
Inspection Date: 3/11/11	Inspection Type: Stormwater Construction
Entry Time: 9:20am	Exit Time: 12:20pm
NPDES ID Number: COR03H278	
Inspector: Natasha Davis	EPA/State/Contractor
Inspector: Stephanie Gieck	EPA/State/Contractor

Facility Location Information:(Name/Location/ Mailing Address)	
Site/Facility Location: Arkansas River Trail Phase 2 4th Street to Clark Street along the south side of the Arkansas River Pueblo, CO	Mail Report to: Michael Brown Langston Concrete Inc. 2335 N Interstate 25 Pueblo, CO 81008

Contact Information:		
	Name(s)/Title	Telephone
Facility Contacts: <i>(indicate primary lead and present during inspection)</i>	Michael Brown, Environmental Specialist	719-546-3000
Person/Company meeting definition of "Operator"	Michael Brown, Langston Concrete Inc.	719-546-3000
Authorized Official(s) (Per NOI or SWMP?)	Michael Brown, Environmental Specialist (Per SWMP)	719-546-3000

Permit Information			
Is the permit on site and available? Y		Date NOI Submitted: 2/7/2011	
Effective Date: 2/8/2011		Expiration Date: 6/30/2012	
Construction Start Date: Unknown	% complete: 5%	Estimated Completion Date: 6/1/2011	
Disturbed Area: 12.8 acres	Total Project Area: 12.8 acres	Latitude: 38° 50' 45"N	Longitude: 104° 37' 8"W
Receiving Water(s): Arkansas River			
If applicable, is waiver certification & approval on file? NA			
Regulatory Inspector's source of information: Mr. Brown, SWMP			

Site Information:							
Nature of Project							Other (Public Trail)
	Residential	Commercial/ Industrial	Roadway	Private	Federal	State/ Municipal	
Construction Stage	Clearing/ Grubbing	Rough Grading	Infrastructure	Building Const.	Final Grading	Final Stabilization	

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Site Description
<p>Langston Concrete Inc. (LCI) is making several improvements to the Arkansas River Trail between 4th Street and Clark Street (approximately 1.25 miles) along the southern boundary perpendicular to the Arkansas River. The trail will be reinforced concrete in some areas and crusher fines in other areas. LCI will also be landscaping, installing multiple culverts, cleaning other culverts, placing rip rap in various areas as well as boulder terracing to stabilize the culverts and steep slopes from the trail to the river.</p> <p>At the time of the inspection, the area where LCI is constructing the trail was unvegetated from Main Street to Clark Street. Photo 1589 shows an overview of the project. Silt fence was installed along the northern boundary of the trail. Rock socks and straw wattles were used to dissipate flow in two culverts and along the construction entrance just east of Main Street. Some of the new culverts had been installed, but the rip rap had not been installed (Photos 1560, 1561, and 1583). Construction was not active at the time of the inspection. LCI was delaying construction until a separate project between 4th Street and Main Street was completed.</p>

SWMP Review		
<u>General</u>	Notes:	
Is a copy of the SWMP onsite (Date)?	Y	A copy of the SWMP is kept in Mr. Brown's vehicle (January 2011).
SWMP completed prior to NOI submission?	Y	SWMP dated January 2011
SWMP administration identified?	Y	Michael Brown
<u>Site Description</u>	Notes:	
Site description including the function of the project?	Y	
Nature/sequence of site activities?	Y	
Total area of site and total area to be disturbed?	Y	12.8 acres
Identification including location of potential sources of pollution?	Y	
Name of Receiving water(s) or MS4 listed?	Y	Arkansas River
Location/description industrial activities, or concrete/asphalt batch plants?	N/A	
Description of soils or existing potential for soil erosion?	Y	
Description of existing vegetation and percent ground cover?	Y	

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<u>Site Map</u>		Notes:
Is there a site map?	Y	
Areas of disturbed, undisturbed and stored areas on site map?	N	The site map does not define which areas are undisturbed or disturbed or where equipment, chemicals, and fuel will be stored on site.
Location of structural BMPs identified in the SWMP on site map (see page 5)?	N	The site map is missing the location of the rock socks seen in the culvert near Main Street, the culvert under the railroad bridge, and the straw wattle used to control the spring water discharge.
Location of non-structural BMPs identified in the SWMP on site map (see page 5)?	N	The location of a dumpster, fuel tank, and chemical storage described in the SWMP are not identified on the site map.
Location of building materials, equipment storage, and waste storage on site map (on-site or off-site)?	N	The location of a dumpster, fuel tank, and chemical storage are not identified on the site map but the use of these BMPs is discussed in the SWMP.
Location of surface water on site map within the project boundary?	N/A	The Arkansas River does not flow within the project boundary, but it is shown on the site map.

SWMP Review		
<u>Controls to Reduce Pollutants</u>		Notes:
Does the SWMP include a description of all BMPs, sequence of BMPs?	N	The SWMP states that straw wattles will not be used on site. EPA observed a straw wattle located on the downhill side of the silt fence near the spring water discharge.
Does the SWMP describe and locate structural practices?	N	The SWMP states that several structural practices will be used on site but the site map does not locate the use of these BMPs in the culverts as seen during the inspection. Nor does the SWMP describe the use of the straw wattle seen on site.
Non-structural practices?	Y	
Phase BMP implementation?	Y	
Material handling and spill prevention?	Y	
Vehicle tracking control?	Y	
Waste management and disposal?	Y	
Concrete washout?	Y	
Groundwater and stormwater	N/A	

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SWMP Review			
<u>Controls to Reduce Pollutants</u>			Notes:
dewatering?			
Final stabilization practices?	Y		
Locations and descriptions of allowable non-storm water discharges?		N	There was a natural spring discharging at the time of the inspection that was not described in the SWMP. It is located half way between Main Street and Clark Street.
Pollution prevention measures for non-storm water discharges?	Y		
Identify pollutant sources from areas other than construction?	Y		
Describe controls for pollutants from non-construction activities?	Y		

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<u>INSPECTIONS</u>		Notes:
<u>(SWMP & Implementation)</u>		
Does the SWMP identify the inspection schedule?	Y	Inspections will be conducted every 14 days or within 24 hours of any precipitation event.
Are the inspections conducted at the specified schedule?	N	Inspections were not available at the time of the inspection. Mr. Brown stated that inspections ceased when construction activities were delayed due to another upstream project interfering with their activities. Mr. Brown did not specify when inspections ceased.
Inspections include all disturbed areas?	Unknown	Inspection reports were not available at the time of the inspection and have not been provided to EPA, as requested during the inspection.
Inspections include storage areas exposed to rain?	Unknown	
Inspections include all BMPs?	Unknown	
Inspections include evidence of or potential pollutants?	Unknown	
Inspections include discharge locations?	Unknown	
Inspections include entrances/exits?	Unknown	
Does the inspection form have the required items (see section I.D.6.b.2 of the Colorado General Permit)?	Unknown	
Inspection signed and certified by authorized personnel?	Unknown	
SWMP and site map revised when BMPs added/modified within 72 hours after inspection reveals problems? Are the changes dated?	Unknown	
Is the SWMP implementation adequate?	Unknown	

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SWMP Implementation (Site review)							
<u>Structural and Stabilization Practices</u>							
List and describe structural and stabilization practices							
	SWMP/Site Map			Used On-Site			Comments
Silt Fence (perimeter)	Y			Y			Silt fence on the map is located adjacent to the shoreline in some areas. The silt fence on site was located adjacent to the disturbed trail, not along the shoreline.
Silt Fence (other)		N		Y			The concrete washout was surrounded with silt fence, which was not shown on the site map. Photo 1587
Storm drain inlet protection	Y			Y			
Straw Wattles		N		Y			Straw wattle used to control the spring water discharge was not addressed. Photo 1574
Rock Socks	Y			Y			Used around culverts. Photos 1560, 1562, 1582, 1583
Rip rap	Y				N		Rip rap has not been installed yet in the culverts.
Vehicle track-out pad	Y			Y			Photo 1588
Good housekeeping & waste disposal practices	Y					NA	The site was inactive at the time of the inspection. A dumpster will be used when activity resumes.
Equipment/maintenance area	Y			Y			The equipment storage area east of the Main Street Bridge was not indicated on the site map.
Concrete washout area	Y			Y			Photo 1587
Port-o-lets	Y				N		The site was inactive at the time of the inspection. A port-o-let will be used when activity resumes.
Existing vegetation		N		Y			Existing vegetation on the slope from the trail to the river was seen on site but not indicated as a vegetative buffer BMP in the SWMP or site map. Photo 1568
Seeding	Y				N		Seeding will be used during final stabilization.
Filter Fabric		N		Y			Erosion control matting was seen on site. Photos 1562, 1583
Culverts		N		Y			The culvert partially constructed east of Main Street has the potential to discharge a significant amount of sediment. Photos 1560, 1584, 1585, 1586

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SWPPP Implementation (Site Review)	
Structural and Stabilization Practices	
Any unprotected/exposed slopes/areas without vegetation mulch or matting after construction activity has ceased?	<p><i>(e.g., indicate "yes" or "no"; if "yes", how long without stabilization measures?)</i> <i>(Note: for information only in Colorado)</i></p> <p>Yes, there was one location along the trail approximately 3/4 of the way between Main Street and Clark Street where an approximate five foot wide section of soil was disturbed from the trail down the hill to the river prior to the inspection. The cause of the disturbance is unknown. No BMPs, mulch or matting were in place to control erosion from this area as seen in photo 1577.</p> <p>The unvegetated trail was bordered by silt fence, but there was unprotected disturbed soil on the downhill side of the silt fence (Photo 1568); Mr. Brown stated that LCI had not planned to manage this disturbed area.</p>
Are stabilization practices properly applied in a timely manner and adequately maintained?	<p><i>(e.g., indicate "yes" or "no"; if "yes", how long without stabilization measures?)</i></p> <p>No, see explanation above. Additionally, the culvert constructed east of Main Street (Photos 1560, 1584, 1585, 1586, 1589) had not been completed but could have been completed in a timely manner, as specified in the SWMP, or additional correctly installed BMPs put in place to prevent direct discharges (Photos 1584, 1586) into the Arkansas River. LCI plans to complete the culvert by installing rip rap.</p>
Are structural controls properly installed and maintained?	<p><i>(e.g., indicate "yes" or "no"; explain if necessary)</i></p> <p>No, there were several areas where the silt fence was not trenched or replaced when damaged, as seen in photos 1563, 1573, 1576, and 1582. There were areas where silt fence was found in the river, as seen in photos 1565, 1566, and 1575. Below the culvert near Main Street, the silt fence could easily be bypassed, as seen in photo 1584. In addition, the culvert installed near the railroad bridge, just west of Clark Street, had filter fabric that had been washed from above the culvert through the pipe (Photo 1583).</p>
Discuss how the structural controls are, or are not appropriate for the site.	<p><i>(e.g., silt fence installed in a live stream)</i></p> <p>LCI plans to install rip rap in the culvert located at the Main Street bridge (photos 1560 and 1585), but delay in construction has prevented this from occurring and allowed sediment erosion into the Arkansas River. Furthermore, the silt fence installed at the base did not surround the area where potential erosion could occur as seen in photo 1584.</p>

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<u>Miscellaneous</u>	
Evidence of Sediment Deposition to Surface Waters	<p><i>(e.g., significant turbidity observed in a receiving water body)</i></p> <p>Yes, the Arkansas River below the Main Street bridge culvert contained excessive sediment downhill from the disturbed area explained above and seen in photo 1577. The sediment seen in photo 1579 and 1580 was deposited below the disturbed strip as compared to a shoreline below an undisturbed area in photo 1581.</p>
Pollution prevention measures for non-storm water discharges?	<p><i>(provide brief description)</i></p> <p>Silt fence around the concrete wash out was installed to prevent discharges (Photo 1587).</p>
Has implementation of additional/modified BMPs been completed before next anticipated storm event?	<p><i>(provide brief description)</i></p> <p>The BMPs on site were installed, inspections ceased, and modified BMPs or the need for additional BMPs has not been evaluated.</p>

Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1558

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View to the north of a separate project taking place northwest of Union Avenue.



Photo Number 1560

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View to the north of a new culvert outlet and drainage into Arkansas River from the trail east of Main Street bridge.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1561
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description View of the culvert outlet of Photo 1560.



Photo Number 1562
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description View of a culvert at the construction site entrance located east of the Main Street bridge. Note the inlet protection has not been maintained.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1563

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View of the project looking west toward Main St. Note the disturbance on both sides of the silt fence and the damage to the silt fence.



Photo Number 1564

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View down the hill from the trail toward the Arkansas River. Note the vegetation in the center of the photo is matted down in the same direction toward the river.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1565

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description Down silt fence in the Arkansas River along the project site.



Photo Number 1566

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View of the Arkansas River along the project site looking west toward Main St. Note the down silt fence in the lower right corner of the photo.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1567

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View of the Arkansas River along the project site looking west toward the Main Street bridge.



Photo Number 1568

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View of the project looking west toward the Main Street bridge. Note the disturbance on both sides of the silt fence.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1569
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description View of a culvert inlet looking north toward the Arkansas River.



Photo Number 1570
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description Close-up view of the culvert showing Photo 1569.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1571

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View of the culver outlet for the inlet shown in Photos 1569 and 1570.



Photo Number 1572

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View to the east of water flowing from the hillside, along the path, and then under the silt fence to the Arkansas River.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1573

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View of the water from Photo 1572 flowing under the silt fence toward the Arkansas River. Note the silt fence is not trenched.



Photo Number 1574

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View of the downhill side of the silt fence shown in Photos 1572 and 1573.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1575

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View of silt fence in the river below the area of Photos 1572-1574.



Photo Number 1576

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View to the east showing damaged silt fence.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1577

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View to the north of disturbance along the hillside below the trail to the Arkansas River.

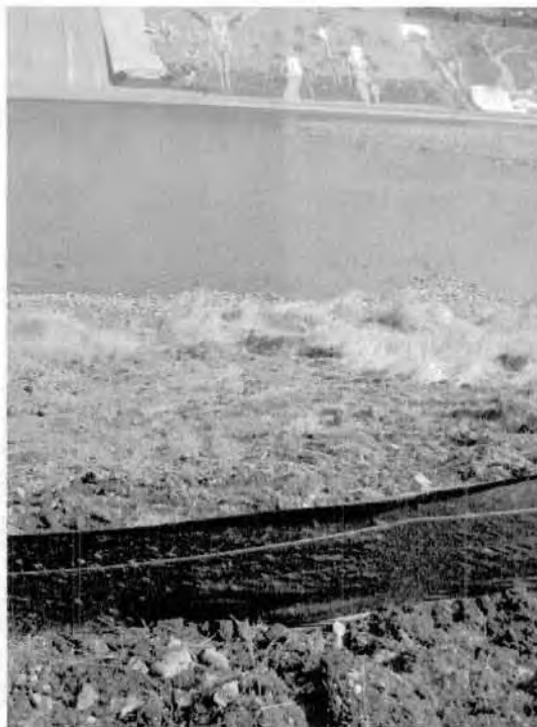


Photo Number 1578

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View from the river looking uphill to the south of down vegetation and sediment below Photo 1577.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1579

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View to the north, toward the river, of down vegetation and sediment along the Arkansas River bank below Photos 1577 and 1578.



Photo Number 1580

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description Close-up view of sediment along the bank shown in Photo 1579.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1581
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description Contrast of typical sediment deposit along the bank of the river approximately 5-10 feet east of Photo 1580.



Photo Number 1582
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description View to the north toward the Arkansas River of damaged silt fence on the east side of the project site under the railroad bridge, near Clark St.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1583

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View to the north toward the Arkansas River of sediment just below a culvert outlet at the east end of the project site near Clark St. Note the fabric that has been pushed through the culvert from above.



Photo Number 1584

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description View along the river looking southwest toward Main St. below the drainage shown on Photo 1560. Note that stormwater could flow around either side of the silt fence.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1585
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description View uphill to the south of the drainage shown in Photo 1560 showing the same silt fence as in Photo 1584.



Photo Number 1586
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description Second view along the river looking southwest toward Main St. below the drainage shown on Photo 1560. Note the difference in the sediment near the silt fence compared to the area near the first bridge (Main St.).



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1587
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description Concrete washout located near the equipment storage area and the construction site entrance near Main Street.



Photo Number 1588
Inspection Date 3/11/2011
Photographer Stephanie Gieck
Description View to the south of a vehicle track out pad along Main St. at the top of the construction site access ramp.



Photographs for Arkansas River Trail 2 - COR03H278

Inspection Type: Stormwater - Construction

Photo Number 1589

Inspection Date 3/11/2011

Photographer Stephanie Gieck

Description Overview of the project site from Main St. looking east. The culvert outlet drainage shown in Photo 1560 is visible in the center of the photo.



INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	- Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B — EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L — Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.