



Confirmation Notice
AFSPC ESOHCAMP and Training/Workshop Support
No. CN CK61-008

Date: 23 March 2009	Submitted By: Denise Seery
Contract No.: FA4890-04-D-0005	Task Order No.: CK61
URS Project No.: 22240684.10000	
Subject: Documentation of the Environmental Protection Agency (EPA) Region 8 Federal Water Program Managers Meeting (sponsored by HQ AFSPC/A7AQ), 6 March 2009	
Location: URS Denver office, Denver, Colorado	
Meeting Date: 6 March 2009	
Planners/	Ed Carver, HQ AFSPC/A7AQ
Participants:	Julie Van Dusseldorp, URS-Denver Laura Stofan, URS-Denver Meeting Attendees (see Attachment 2)
Summary: This confirmation notice documents the completion of an EPA Region 8 Federal Water Program Managers Meeting, 6 March 2009.	

Headquarters Air Force Space Command (HQ AFSPC) sponsored an EPA Region 8 Federal Water Program Managers Meeting on 6 March 2009 at the URS office in Denver, Colorado. Ms. Julie Van Dusseldorp and Ms. Laura Stofan from URS-Denver supported the preparations for this meeting and provided meeting facilitation. A total of 13 people participated in this meeting, including the URS staff. Evaluation forms were not distributed for this meeting. The agenda and list of invitees is provided below in Attachment 1, and the contact information for the attendees is provided in Attachment 2. A summary of the discussions is provided as follows:

1. Ms. Van Dusseldorp opened the meeting with a group welcome, safety moment, and the current meeting agenda. Mr. Carver reviewed the meeting agenda items and requested input from all of the attendees regarding their expectations of the meeting and what topics they would like to cover. Review of the draft Fort Carson MS4 permit and audit conducted by Mr. Davis were identified as focus topics for the meeting. The group also suggested industrial permitting, privatized housing, the Energy Independence and Security Act, and the proposed audit schedule as additional topics for discussion. Mr. Carver reviewed the overall objectives of the meetings for the new participants. Meeting attendees were introduced.
2. Ms. Carter noted that there is a proposed Fountain Creek Water District that may function similarly to Urban Drainage and Flood Control District (UDFCD) as guidance in the Colorado Springs region. She also noted that the Drainage Criteria Manual Volume II (DCM II) currently in use in Colorado Springs and El Paso County is being rewritten and will affect stormwater management standards in the Colorado Springs region.
3. The group began discussion of the audit conducted at Ft. Carson by Mr. Davis. Ms. Carter stated that the audit conducted by Mr. Davis was very detailed. In order to help the audit run smoothly, Ms. Carter conducted interviews and sent out the audit questionnaires to base personnel beforehand. She noted that she was met with some resistance from Army Corps of Engineers and contractors concerning the audit because they perceived the audit as an



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attempt to question practices rather than gather information. The audit was conducted over approximately four days and the resulting permit is very specific to the base. Fort Carson's legal office was involved with contracting interviews. The base received EPA's feedback during the audit closeout meeting.

4. The group discussed how to encourage contracting officers to take a more active enforcement role. At Ft. Carson, enforcement language was included in the Stormwater Management Plan (SWMP), and the base attorneys are involved. Mr. Davis expressed the EPA's desire to have an enforceable policy that will also apply to contracting. The group discussed whether the enforcement policies should be specific or if they should be general. Mr. Davis noted that 40 CFR 122 requires a regulatory mechanism and procedures for enforcement, and noted that a specific plan would be preferable, but a general plan will suffice. Mr. Carver clarified that any enforcement plan should be located in the SWMP and not in the MS4 Permit. The overall consensus of the group expressed a desire to design and implement enforcement policies on a local level at each base rather than develop an Air Force Instruction.
5. The group discussed differences in information that should be included in the permit, the SWMP, and the annual report. Mr. Davis stated that historically the annual report contained actions taken to meet the six minimum control measures, but the new MS4 permits will contain compliance requirements. He noted that while some general best management practices (BMPs) to meet the measures are contained in the permit, BMPs that go above and beyond can be located in the SWMP. Mr. Davis also noted that each facility should have as much information as possible specific to the site within the permit. Mr. Carver noted that a site should be committed to implementing every item in their plan. In cases where some flexibility may be necessary, he recommended developing language in the plan to say "additional measures as practicable," and record what was successfully implemented in the annual report.
6. The group discussed enforcement issues with the permit and SWMP. Mr. Davis expressed a desire to evaluate the MS4 permit and construction compliance separately. The group expressed concern over this because language in the MS4 permit has the potential to apply to construction. Mr. Carver noted that the problem with an enforcement policy related to construction due to the fact that the contractor should be held responsible for compliance issues. Ms. Carter noted that construction compliance is covered under the CGP, though there are still requirements under the MS4. Ms. Carter offered to send Ft. Carson's enforcement procedures to Mr. Carver.
7. The group discussed overall issues with the draft MS4 Permit for Fort Carson. Mr. Carver stated that when bases are writing the individual permits, selecting BMPs that are above the requirements should be indicated as to only be used when practicable. Mr. Davis noted that the National Institute of Standards and Technology (NIST) permit requires a lot less due to BMPs being site-specific. He also noted that the Best Practical Technology (BPT) standard



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is numeric, while the Maximum Extent Practicable (MEP) is not defined but is facility specific and can be described in the permit language. Mr. Davis also stated that all requirements in a permit are effective upon issuance of the permit, unless otherwise specified. Mr. Carver suggested developing a process checklist based on the permit in order to ensure compliance is achieved. Ms. Carter and Mr. Davis stated that most of the requirements in the draft Fort Carson MS4 permit are things that the facility is already doing. Mr. Carver stated that the requirements written in the permits should be general and that details should be called out in the SWMP and changed each year as appropriate with the SWMP updates. Mr. Davis stated that the word "consider" used throughout the permit gives the permittee more flexibility to do what needs to be done in order to achieve compliance. Mr. Davis also noted that the base has 30 days to comment on their permit and that a lot of the permit contains boilerplate language.

8. The group discussion of specific permit sections was as follows for the draft Fort Carson MS4 permit (Attachment 3) by section numbers listed:

- 1.2.1.1 All portions of the MS4 in this section are defined in Section 1.1.
- 1.3.3 Industrial Activities is an MSGP citation and sampling should be done before it becomes comingled with discharges associated with the MS4 permit.
- Part 2 General Requirements includes standard text and is not site specific.
- 2.1 SWMP updates should be called out in the annual report.
- 2.2.1 The reference to students in this section is connected to the requirement in 2.2.4 regarding developing materials for education and outreach that should be age appropriate. Most permittees target elementary school age children (approximately 5th grade). In order to fulfill this permit condition, describe what you have done for public education and outreach. Identify groups that need to be involved in order to provide education and outreach. For example, Ft. Carson included a matrix in the SWMP that they fill out when providing this service.
- 2.2.3 Mr. Davis will add the definitions for green infrastructure and LID practices to the definition section in the permit for clarification.
- 2.2.5 The permit requires tracking the distribution of the stormwater awareness brochure. Mr. Davis explained that this means to maintain records of where they were placed, what events they may have been distributed at and/or who they were given to, and how many were given out. Be able to demonstrate what you've done and if it's been effective. Each base is to implement what



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they think will work and ensure that it is documented. The group discussed replacing the word "track" with "disseminate", or changing the language to "provide a summary of distribution". This requirement should be included into records of implementing BMPs.

- 2.2.7 Mr. Davis stated that the condition of dealing with housing is a necessary requirement. It is facility specific and applies to private housing. The group discussed developing a brochure or insert to include in every new resident package that summarizes SWMP requirements. Low Impact Development (LID) usually applies to housing managers, not necessarily residents. The intent of this condition is to provide education as to why the housing area was developed in the way it was so that when it is maintained, those maintaining it are aware that the structure and layout should not be changed. Mr. Carver requested changing the language to indicate that the condition requires a dissemination of materials rather than education since education implies that those who receive the education have to sign off on a training of some sort.
- 2.2.8 Mr. Davis explained that this permit condition is intended to disseminate information to people who may not know their practices have the potential to create regulated hazardous waste. The emphasis of this condition is to distribute information. He noted that it is possible for some areas in this permit to overlap other existing permits, such as RCRA, and duplicate informational guidance may be used.
- 2.2.9 Document education and outreach activities that you've created and how you've disseminated it in the SWMP.
- 2.3.3 River Clean up Day is a concept specific to Ft. Carson.
- 2.3.7 The group discussed the term "...and collect comments". Mr. Davis suggested that the most effective way to handle this is to collect comments related to the SWMP and set aside a day to make updates to the SWMP. There may be confusion if the SWMP were updated every time a comment was made. The Note in this section of the permit will define the upper management for each facility within the individual permits.
- 2.3.8 Each of the minimum control measures contains annual report requirements that relate back to a specific permit condition. Mr. Carver will send a copy of the completed audit package that Dana McIntyre had completed to Mr. Siegele for review.



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- 2.4.1 Illicit discharge is explained in Section 1.3.2 and is defined in the definitions section.
- 2.4.8 Illicit discharges must be fixed immediately, and every day the discharge continues is a violation. Illicit discharges need to be reported. Mr. Davis stated that the 15 and 45 day investigation requirements are standard, not site specific. Dry weather screening typically requires one inspection per year.
- 2.4.11 This condition specifies that household hazardous waste must be collected as practicable, or as needed, keeping the language flexible for each base.
- 2.4.12 Stenciling storm drains is specific to Ft. Carson. Facilities will not be expected to achieve 100% of the storm drains stenciled.
- 2.4.14 The state of Colorado requires permits for construction site dewatering. More stringent wording may be included in future permits to comply with those requirements.
- 2.4.15.4 The group discussed if this condition regarding the description of training materials for response to illicit discharges was necessary as it appeared redundant. This condition may be removed from this section and added to the training section.
- 2.5.3 The group discussed potential plans for how to implement enforcement for construction sites. Mr. Lewis suggested requiring contractors to have an on-site environmental manager. The CGP already requires a "qualified person" to be on-site. Mr. Davis stated that the language in this section will be site-specific for each facility.
- 2.5.8 The inspection plan can be very simple or it can be specifically written into the permit. A smaller program doesn't necessarily need as much as detail as Fort Carson in their permit.
- 2.5.11 This condition gives herbicide/pesticide applicators the ability to review plans and to comment. This condition is specific to a Fort Carson review process in place.
- 2.6.1, 2.6.4, and 2.6.5
Each facility has a different contract process for new development and redevelopment projects. Facilities will have to review any new project after the issuance date of the permit. The Energy Independence and Security Act of 2007 regulates construction site pre-development hydrology for project sites



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with a footprint larger than 5,000 square feet. Mr. Carver noted that the Clean Water Act, required in 40 CFR, allows the EPA to regulate sites greater than one acre. Mr. Davis explained that since federal facilities have to comply with the Energy Independence and Security Act of 2007 requirement for these sites, it is practicable to apply it to all sites greater than one acre in accordance with 40 CFR. Mr. Carver raised questions as to if the EPA can enforce on the requirement and suggested he contact those responsible for working with the Energy Independence and Security Act within the Air Force to get an answer to this question. The group also discussed whether or not this requirement would be more expensive to implement. Ms. Carter stated that it is mostly a change in technique and can be quite inexpensive for Fort Carson.

- 3.1.2 This condition pertaining to monitoring is base specific, though all permittees will have three years to develop a monitoring program. The program will be developed specifically for each facility within the individual permits. Mr. Carver proposed using “visual monitoring” as an option. Mr. Davis requested that option be proposed in individual permits and he would consider it.
- 3.1.3 “Meets the goals of this permit” is not actually defined in the permit. Mr. Carver stated that he thought the wording was vague enough to be able to allow flexibility within the permit language. Mr. Davis stated that the goal for this permit term is to evaluate trends and use this information as a tool to either modify or add BMPs for the next permit term. The risk that permittees run is that additional permit requirements may be included to the permit renewal if trends are discovered and are not properly addressed.
- 3.3 Annual Reports are due one year from permit issuance. The facility can request an extension from the EPA due to reporting requirements and potential to require changes to the SWMP that may require contracting services. Mr. Carver requested that Mr. Davis provide standard extension language in this section.
- 4.7.1 Mr. Siegele requested that this condition requiring NOI/NOT signatures be more flexible. Mr. Davis explained that the condition is a specific requirement in the CWA and he does not have the authority to change the condition. Mr. Carver stated that it is up to the Air Force to interpret and possibly delegate this responsibility down. Mr. Carver will find a legal interpretation for this requirement and get a position for the AF to determine if someone else could be delegated to sign NOIs/NOTs for the Wing Commander.
- 4.7.2 The reference in this condition should be 4.7.1. Mr. Davis will revise.



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9. The group discussed the upcoming site audit schedule. Buckley requested to conduct their audit in May and Peterson would like to conduct their audit in April or May. Mr. Davis will check his schedule and send an email to the group regarding availability and a proposed schedule.
10. Mr. Carver suggested that the group review the Technical Guidance on Implementing the Energy Independence and Security Act of 2007 that Mr. Davis distributed, and provide comments through the Air Force chain of command at each facility. Mr. Carver will send out an email regarding submittal of comments.
11. Mr. Davis provided a status update on Industrial Permits. All permits will have sampling requirements, and results should be submitted using the standard local DMR process. Mr. Davis stated that the terms will likely be identical to the federal 2008 MSGP, and he expects to have it done by the end of 2009 (Region 8 federal facilities and Indian Country). Send NOIs to Greg and DMRs to the regular local contact.
12. Mr. Siegele requested a method for the group to be able to share the information, policies, procedures, training, BMPs, etc. necessary to the MS4 permit. Mr. Davis volunteered to post documents on the EPA website for easy accessibility. Any material should be sent to Mr. Davis to post, though all identifying information should be removed or edited since the website is open to the public.
13. Action items (provided in the table below) were reviewed and the meeting was adjourned. Mr. Carver will track these actions through closure.

ACTION ITEMS				
No.	Para. Ref. Above	Description	Responsibility	Date Needed
1	6	Send Ft. Carson's enforcement procedures to Mr. Carver.	Ms. Carter DPW-ENV	as completed
2	8 2.2.3	Add definition for "green infrastructure" and "LID" practices to the permit.	Mr. Davis Region 8 EPA	20 MAR 2009
3	8 2.3.8	Send a copy of the audit package to Mr. Siegele.	Mr. Carver, HQ AFSPC/A7AQ	As completed
4	8 2.6.1 2.6.4 2.6.5	Contact those working with the AF Water Board to determine if the pre-hydrology requirements within the Energy Independence and Security Act of 2007 are enforceable by the EPA through the CWA.	Mr. Carver, HQ AFSPC/A7AQ	continuing



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ACTION ITEMS				
No.	Para. Ref. Above	Description	Responsibility	Date Needed
5	8 3.3	Include additional language allowing for annual reporting extension requests.	Mr. Davis Region 8 EPA	continuing
6	8 4.7.1	Find a legal interpretation of "principal executive officer". Determine if authorization may be granted to sign on behalf of the Wing Commander.	Mr. Carver, HQ AFSPC/A7AQ	continuing
7	8 4.7.2	Revise the reference in Section 4.7.2 in the permit from 5.7.1 to 4.7.1.	Mr. Davis Region 8 EPA	As completed
8	9	Review audit schedule and send out an email to the group regarding available audit dates and a proposed audit schedule.	Mr. Davis Region 8 EPA	27 March 2009
9	10	Send an email to the group regarding details on the submittal of comments to the Technical Guidance on Implementing the Energy Independence and Security Act.	Mr. Carver, HQ AFSPC/A7AQ	As completed
10	12	Send documents, procedures, policies, training, etc. to Mr. Davis to post on the EPA website.	All Participants	As completed

ATTACHMENTS:

1. List of invitees
2. Attendee contact information
3. Draft Fort Carson MS4 Permit

DISTRIBUTION (via e-mail):

Mr. Monte McVay, HQ AFSPC/A7AQ
Mr. Ed Carver, HQ AFSPC/A7AQ
All invitees
Ms. Carol Cromer, U.S. Army CoE, Mobile District

Ms. Denise Seery, URS (DEN), Project Manager
Ms. Terri DeMartino, URS (NPN), ECAS Contract
Administrator
Denver Project File (hard copy)



Attachment 1

Region 8 Federal Water Program Managers Meeting

6 March 2009, 0900-1500

Denver, CO

Location:

URS Office (Conference Room 2 Main)
8181 East Tufts Ave.
Denver, CO 80237
303-694-2770

Invitees:

See next page

Discussion Topics:

- ❖ Stormwater audits completed by EPA, Region 8
- ❖ Fort Carson Draft MS4 permit
- ❖ Potential municipal separate storm sewer system (MS4) permit language for Air Force facilities
- ❖ How EPA, Region 8 will proceed with audit and permit schedule

Agenda:

0900	Welcome/Logistics/H&S Moment	URS
0910	Opening Comments/Meeting Objectives	Ed Carver, HQ AFSPC/A7AQ
0920	Participant Introductions & Expectations	All
0930	Audit and draft permit discussion	All
1130	Lunch Break (no-host, working lunch)	
1200	Continued Discussion	All
1430	Action Items Review	URS
1445	Participant Closing Comments/Schedule Next Meeting	All
1500	Adjourn	Ed Carver, HQ ASFPC/A7AQ

Documents for Discussion:

- MS4 permit audit reports from NIST and Fort Carson

Each installation representative should be prepared to share/discuss how the topics above, as applicable, have impacted their installation/facilities.



Attachment 1

Region 8 Federal Water Program Managers Meeting

Invited Attendees

HQ AFSPC/A7AQ, Peterson AFB

Mr Ed Carver, Command Water Program
Manager

U.S. EPA, Region 8

Mr Greg Davis, Region 8 Storm Water
Coordinator, Denver, CO

21 CES/CEVQ, Peterson AFB

Mr William Siegele, Water Program Manager
Mr Dave Anderson, Site Support
Mr Todd DeGarmo, Site Support
Ms Melissa Trenchik, Site Support

50 CES/CEV, Schriever AFB

Mr Albert Fernandez, Program Manager
Mr John Mooney, Program Manager

460 CES/CEV, Buckley AFB

Ms Laurie Fisher, Acting Flight Chief
Mr Corwin Oldweiler, Water Program
Contract Support

721 MSG/CEV, Cheyenne Mountain AFS

Mr Jason Cook, Environmental Flight Chief

Army REC

Cathy Atkins, Region 8 Environmental
Coordinator, U. S. Army Regional Environmental
Center

AFCEE/CCR-D

Ms Sue Stell, U. S. Air Force Regional
Environmental Office

Bureau of Prisons

Mr James Benner, Safety & Environmental
Specialist
Mr Edward Beed

Colorado Air National Guard

Ms Dee Hawkins, Environmental Manager

Colorado Army National Guard

Mr Lonnie Funk, Water Program Manager
Mr Mark Hague, Environmental Flight Chief
Ms Beth McCane, Environmental Manager

**National Institute of Standards and Technology
(NIST)**

Mr David Garrity, Environmental Engineer

GSA

Mr. William Fieselma

Fort Carson

Ms Stephanie Carter, Water Program
Manager

Ms Jennifer Cummings

U.S Air Force Academy

Mr Matthew Lewis, Water Program Manager

Veteran's Administration

Mr Michael Adams

Mr Kenneth Nevling, Water Program Manager

Tetra Tech

Mr Ben Recker, Colorado Springs
Mr David Gwisdalla, Colorado Springs

URS Corporation

Ms Denise Seery, Denver
Ms Julie Van Dusseldorp, Denver



Attachment 2

Region 8 Federal Water Program Managers Meeting
06 March 2009

Attendee Addresses

Name	Address	Phone	E-Mail
Mr Edward Beed	Federal Bureau of Prisons FCI Englewood 9595 West Quincy Avenue Littleton, CO 80123	Comm: (303) 985-1566, ext. 1330	ebeed@bop.gov
Ms Stephanie Carter	Storm Water Program Manager DPW-ENV 1638 Elwell St, Bldg 6236 Fort Carson, CO 80913	Comm: (719) 526-1697	stephanie.carter5@us.army.mil
Mr Ed Carver	Program Manager HQ AFSPC/A4/7AQ 250 S. Peterson Blvd., Suite 224 Peterson AFB, CO 80914-4150	Comm: (719) 554-7717 DSN: 692-7717	ed.carver@peterson.af.mil
Ms Jennifer Cummings	Storm Water Coordinator Innovar DPW-ENV 1638 Elwell St, Bldg 6236 Fort Carson, CO 80913	Comm: (719) 524-2125	jennifer.e.cummings@us.army.mil
Mr Gregory Davis	Region 8 Storm Water Coordinator U.S. Environmental Protection Agency (8P-W-P) 999 18th Street, Suite 300 Denver, CO 80202	Comm: (303) 312-6314	davis.gregory@epa.gov
Mr Albert Fernandez	Environmental Program Manager 50 CES/CEAQ 500 O'Malley Ave, Suite 19 Schriever AFB, CO 80912-5019	Comm: (719) 567-4026 DSN: 560-4026	albert.fernandez@schriever.af.mil



Attachment 2

Region 8 Federal Water Program Managers Meeting
06 March 2009

Attendee Addresses

Name	Address	Phone	E-Mail
Mr William Fieselman	Pacific Western Technologies (PWT) GSA, DFC Environmental Programs Group Building 41, Room 240 Denver Federal Center P.O. Box 25546 Denver, CO 80225-0546	Comm: 303 236-8000 ext.2344	william.fieselman@gsa.gov
Ms Laurie Fisher	Environmental Quality Chief 460 CES/CEV 660 S. Aspen, Stop 86 Buckley AFB, CO 80011-9551	Comm: (720) 847-9218	laurie.fisher@buckley.af.mil
Mr Matthew Lewis	Water Quality & Hazardous Waste Manager 10 CES/CEV 8120 Edgerton Drive, Suite 40 U.S. Air Force Academy, CO 80840	Comm: (719) 333-8394	matthew.lewis.ctr@usafa.af.mil
Mr Kenneth Nevling	Water Program Manager Veteran's Administration	Comm:	Kenneth.Nevling@va.gov
Mr Bill Siegele	Chief, Environmental 21 CES/CEVQ 580 Goodfellow St Peterson AFB, CO 80914	Comm: (719) 556-7088 DSN: 834-7088	william.siegele@peterson.af.mil
Ms Laura Stofan	Environmental Scientist URS Corporation 8181 East Tufts Avenue Denver, CO 80237	Comm: (303) 796-4745	Laura_Stofan@urscorp.com
Ms Julie Van Dusseldorp	Environmental Scientist URS Corporation 8181 East Tufts Avenue Denver, CO 80237	Comm: (303) 740-2779	julie_vandusseldorp@urscorp.com