



Confirmation Notice
AFSPC ESOHCAMP and Training/Workshop Support
No. CN CK56-015

Date: 10 June 2008	Submitted By: Denise Seery
Contract No.: FA4890-04-D-0005	Task Order No.: CK56
URS Project No.: 22239853.11000	
Subject: Documentation of the Environmental Protection Agency (EPA) Region 8 Federal Water Program Managers Meeting (sponsored by HQ AFSPC/A7AQ), 6 June 2008	
Location: URS-Colorado Springs Office	
Meeting Date: 6 June 2008	
Planners/	Ed Carver, HQ AFSPC/A7AQ
Participants:	Lindsay O'Neill and Eric Farrington, URS Corporation Meeting Attendees (see Attachment 2)
Summary: This confirmation notice documents the completion of an EPA Region 8 Federal Water Program Managers Meeting, 6 June 2008.	

Headquarters Air Force Space Command (HQ AFSPC) sponsored an EPA Region 8 Federal Water Program Managers Meeting on 6 June 2008 at the URS office in Colorado Springs, CO. In addition to DoD representatives, additional federal agency water program managers were invited to this meeting at the request of Mr. Davis from EPA and concurrence from AFSPC. Ms. Lindsay O'Neill and Mr. Eric Farrington from URS-Denver supported the preparations for this meeting and provided meeting facilitation. A total of 19 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. Mr. Farrington opened the meeting with a review of the previous meeting's action items and the current meeting agenda. Review of the draft Municipal Separate Storm Sewer System (MS4) permit and the audit questionnaire prepared by Mr. Davis were identified as focus topics for the meeting. The group suggested the design-build applicability for the construction general permit and federal applicability of the new Colorado Department of Public Health and Environment (CDPHE) regulations as additional topics for discussion. Action items 1, 3, and 7 from the previous meeting were identified as ongoing and all other action items had been completed. Mr. Carver reviewed the objectives of the group for the new participants. Meeting attendees were introduced.
2. The group began discussion of the audit questionnaire developed by Mr. Davis. A desire to distribute individual questionnaires to the entire group as they are completed, and possibly compile all results into a spreadsheet for comparison, was expressed. Mr. Davis stated he would prepare the spreadsheet as audits and questionnaires are completed and the group agreed to distribute individual questionnaires as they are completed.
3. The group discussed that providing a suite of options of Best Management Practices (BMPs) to choose from in the permit, instead of only requiring a few specific BMPs, may help with



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implementation and enforcement problems. The group decided that this may not be effective because if specific requirements are not available and there are too many options to choose from BMPs may not get implemented at all.

4. The group discussed the intent of the questionnaire. Mr. Davis stated that the questionnaire would be used as a tool to draft facility-specific permit language. Mr. Carver would like to be able to use the questionnaire as a tool to demonstrate compliance and identify whether current operations will meet the conditions of the permit and if not, what needs to be done additionally to achieve compliance. Mr. Carver would like current operations to be written specifically into the permit so that compliance can be easily demonstrated for enforcement inspectors. Mr. Davis stated that the statement of basis and purpose for the preparation of the permit could be used to provide clarity on intent of permit conditions and demonstrate requirements for compliance.
5. The group discussed issues and concerns with record-keeping requirements. Mr. Gwisdalla explained that Air Force Operations maintains recurring work program (RWP) records by hours spent working in a stormwater category and not by what was specifically done. Mr. Davis explained that this may not be an acceptable form of record-keeping due to difficulties in ensuring that all areas are being addressed and what exactly has been done. The importance of measuring effectiveness of programs, and not just what is being done, was discussed. Ms. Grant stated that General Services Administration (GSA) inspects all outfalls once per year, which does not give useful data or measure performance. A concern of the group was that other departments implement BMPs and environmental personnel do not necessarily have the records. Mr. Davis would like the questionnaire responses to include who is responsible for implementing different BMPs and keeping records so that the Environmental Flight would not have to be responsible for maintaining their own copies of every necessary record. Mr. Davis suggested that a record of a yearly discussion between environmental and other departments responsible for implementing BMPs would be sufficient for record-keeping of BMPs that environmental personnel are not responsible for implementing. Mr. Carver suggested developing checklists to be given out to other departments every quarter to fill in and sign to demonstrate BMPs being implemented. The language used to specify the performance measure in the permit will be critical to demonstrating compliance. The statement of basis and purpose can identify that the records will be kept, but may not be centralized.
6. Issues with funding of BMPs were discussed. A desire for a guarantee of funding from headquarters was expressed, and Mr. Carver did not expect obtaining funding to be a problem, as long as specific or existing BMPs are called out in the request and the appropriate risk score is included. It was discussed that BMPs must be regulatory or compliance driven to be included in the environmental division budget, otherwise they should come out of the operations and maintenance budget.



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7. The group discussed the questionnaire by section. No issues were raised with the General Questions section. In the Public Education section, it was clarified that the facility and inmates are considered the public for a prison. It was also clarified that if school-aged children live on base but leave the facility to attend school they would fall under the homeowners category and the facility would not be required to meeting the school-age student BMP requirements. Mr. Davis stated that he could change the language to "schools" instead of "school-age children" to avoid confusion for facilities without schools.
8. The group discussed question #3 in the MS4 Maintenance section. The meaning of municipal facilities was explained to include roads and grounds, storing of deicer, salt storage, street cleaning, garbage disposal, materials yards, and civil engineering operations for bases. Mr. Davis explained that there could be a facility-specific Stormwater Pollution Prevention Plan (SWPPP) for each municipal facility or a base-wide SWPPP with facility-specific information at each necessary location. He stated that there is flexibility in how bases meet this requirement, as long as there is facility-specific information prepared and available. He stated that it should be something that people at the municipal facilities can understand and a list of BMPs to be used would be acceptable. For some facilities, a Spill Prevention, Control, and Countermeasures (SPCC) Plan may be sufficient. Mr. Davis stated he would alter the language to include "SWPPP or alternate measures" and not just "SWPPP." Mr. Davis also explained that if maintenance is done by contractors they are still under the MS4 permit so the facility is responsible, even if individual contractors have permits with the MS4.
9. The group moved on to discuss questions #1 and #6 in the Construction Activities section. Mr. Davis explained that ensuring MS4s have the legal authority to enforce is actually written into 40 Code of Federal Regulations (CFR) and must be included in the MS4 permits. The Air Force is taking Fort Carson's stormwater enforcement policy to the Judge Advocate (JA) to see what options the Air Force has for enforcement. Mr. Carver suggested the following permit language be included in this notice: "Construction activities fall under contract law, however the issue is being raised to the legal department to determine options available for an enforcement mechanism." Mr. Carver suggested that a standard paragraph written into contracts would be the best option, but the presence of different contracting agencies and mechanisms for tenants on base creates a concern. Ms. Grant stated that a copy of the GSA Environmental Management System (EMS) contract language for stormwater is available at www.GSA.gov/ems if any other facilities would like to use it as a reference.
10. The group raised the same legal questions for the Post-Construction section as the Construction Activities section. No issues were raised with the Industrial/Commercial and Illicit Discharge Detection and Elimination (IDDE) sections.
11. In completing discussion of the questionnaire, the group expressed a desire for Facility Description and Additional Comments sections to be added. The group identified the following items to be included in the Facility Description section: watersheds, water quality



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standards/impaired waters, mixed outfalls, regional setting, operational mission/activities, endangered species, historic properties, planned growth/activities, tenants/leases/ privatization/other facilities, and other applicable NPDES permits. The group stated that these facility descriptions should include properties that are not contiguous, in case they will be included in permit coverage.

12. Mr. Davis stated that he would be completing 2 permits by the end of fiscal year 2008, then alternating between 4 and 2 permits per fiscal year for each year following. The following schedule for questionnaire, audit, and permit completion was agreed upon by the group:

Facility	Submit Questionnaire	EPA Permit Audit	Permit to Public Notice
National Institute of Standards and Technology (NIST)	ASAP	August 2008	September 2008
Veterans Administration	August 2008	September 2008	October 2008
Fort Carson	September 2008	October 2008	December 2008
Peterson	December 2008	January 2009	March 2009
Buckley	March 2009	April 2009	June 2009
Federal Center	June 2009	July 2009	September 2009
Air Force Academy	September 2009	October 2009	December 2009
Federal Prisons	December 2009	January 2010	March 2010

13. The group moved to discussion of the draft MS4 permit prepared by Mr. Davis. It was discussed that the permits needed to include context, including information on relevant pollutants, watersheds, water quality standards, etc.
14. The issue of co-permitting and housing privatization/tenants was discussed. It was stated that operational control needs to be better defined to clarify enforcement over privatized areas. Mr. Davis stated that a Memorandum of Agreement would probably not be realistic and he would like to take it out of the permit language. The general consensus was that requiring bases to control everything on the facility property, including tenants and private housing, would be easier to enforce than having co-permittees. The group decided to table all discussion of privatized housing, tenants, and co-permitting until a legal opinion is ready. Mr. Davis agreed to provide Mr. Carver with a statement of the EPA's legal position on privatization and co-permittees.
15. A need to check all paragraph references within the permit was discussed. Mr. Davis stated that references to five years for implementation would be removed from the general requirements and put in specific sections as required and appropriate. He stated that all references to residents and businesses would be changed to general public.



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16. The group discussion of specific permit sections was as follows:

- 1.1 The defined area covered will vary depending on the specific facility. The permitted area is traditionally based upon the urbanized boundary, but there is flexibility for the permitted area to be defined by the permitting authority (i.e., EPA). A map of the permitted area will be required to be incorporated into the SWPPP for each facility.
- 1.2.2 The following allowed non-stormwater discharges should be added to the list: discharges from stormwater management structures, de-chlorinated potable water line flushing, roof drains, fire hydrant flushing, and pavement and building power-washing where no chemicals are used.
- 1.3.1 Another question for Mr. Carver to bring to JA is how the co-permittee process might affect host-tenant support agreements.
- 1.5.2 Concern over the implied requirement to test and verify all naturally-occurring sources of non-stormwater are safe to discharge was discussed. "Provided that the permittee determines that they are not significant contributors of pollutants to the MS4" could be changed to "unless the permittee determines they are significant contributors of pollutants" or provide a caveat in the permit language to exclude naturally occurring sources that the MS4 has not negatively impacted.
- 1.5.7 The group did not see the value of the last sentence in this section. Mr. Davis explained that it just means the EPA may invoke Section 308 of the Clean Water Act if it becomes necessary due to negative impacts on water quality.
- 1.5.8 Discharge standards still apply to outfalls that discharge within the MS4 area.
- 1.5.10 The beginning of the last paragraph should be changed to read "Discharges or discharge related activities."
- 2.1.6.2 Change section to reference annual reporting and allow flexibility to make changes within the year without written notification to the EPA. Mr. Davis stated that he would delete section 2.1.6 and reference section 2.5.9 (annual reporting). Changes will be able to be made without correspondence with EPA as long as everything is justified and documented. The Statement of Basis and Purpose will summarize the previous five years of BMPs.
- 2.2.5 Adopt a storm drain will not be feasible because it would require confined space training and entry.



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- 2.2.6 The 3-year timeline was intentional and will be left in the permit.
- 2.3 National and prison security issues exist with stenciling storm drains and the section will be tailored for specific facilities.
 - 2.3.2 Amount of map and location information made available to the general public should be limited for security reasons. Mr. Carver was concerned about putting materials on websites for security reasons. Mr. Davis would like to put electronic versions of annual reports on the EPA website and a link to the EPA website could be included on the facility websites to meet the conditions of the permit. Mr. Davis will include a note in the posted annual report that portions have been left unavailable to the public for national security reasons.
 - 2.4.2 This section is verbatim from 40 CFR and must remain in the permit as written. Existing laws can be used to demonstrate compliance.
 - 2.4.4 The group suggested including a proposal for dry weather sampling/monitoring for following year in annual reports to be reviewed by Mr. Davis, instead of putting specific conditions in the permit, and adding "as appropriate and agreed upon in the annual report" to the permit language. Mr. Davis suggested that the pretreatment programs can also be used as a resource to satisfy monitoring requirements.
 - 2.5.8 The group expressed concern over the monthly requirement to inspect all construction sites. Mr. Davis asked that everybody provide a proposed alternative requirement for construction site oversight via email, along with review comments for the remainder of the permit.
- 17. Mr. Davis clarified that only description of items accomplished in the current year need to be included in annual reports, although a brief listing of previous accomplishments may also be helpful. It was also clarified that facilities are not required to reach everybody as part of public education and outreach, as long as information is being offered and an attempt is being made to the maximum extent practicable.
- 18. A question over whether spills to the MS4 are under the jurisdiction and reportable to the State was discussed. Some stated that everything must be reported to the State and others stated that the State distinguishes between the MS4 and anything outside the facility footprint. No consensus was reached by the group.



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19. The group decided that comments and concerns on the remainder of the permit, and any legal concerns, would be submitted directly to Mr. Davis via email and Mr. Davis will prepare and circulate annotated comments. Based on the amount of comments received the group will decide whether to conduct another face-to-face meeting or a telephone conference call on 25 June 2008. The group will tentatively plan on a meeting 25 June 2008 at the URS-Colorado Springs office.
20. 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	2	Distribute completed questionnaires to group and spreadsheet with responses of all facilities to group.	Mr. Davis Region 8 EPA	as completed
2	Prior Item	Engage conversation with legal department for a policy statement/ordinance on the Energy Act.	Mr. Carver HQ AFSPC/A7AQ	continuing
3	9, 14, &16/1.3.1	Elevate jurisdictional issues with privatized portions of the installations to legal department.	Mr. Carver, HQ AFSPC/A7AQ	continuing
4	14	Provide Mr. Carver with a statement of EPA's legal position on privatization and co-permittees.	Mr. Davis Region 8 EPA	11 June 2008
5	16 2.5.8	Provide alternative text for construction oversight requirements to Mr. Davis via email.	All Participants	13 June 2008
6	19	Distribute revised audit questionnaire to all participants.	Mr. Davis Region 8 EPA	11 June 2008
7	19	Provide draft permit comments/concerns, and legal concerns, to Mr. Davis via email.	All Participants	13 June 2008
8	19	Provide annotated comments and revised permit based upon 6 June discussion and submitted comments to all participants.	Mr. Davis Region 8 EPA	18 June 2008
9	19	Communicate to URS whether face-to-face meeting or telephone conference call is required.	Mr. Carver, HQ AFSPC/A7AQ	20 June 2008
10	19	Conduct face-to-face meeting or telephone conference call to discuss remaining permit issues.	All Participants	25 June 2008



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ATTACHMENTS:

1. List of invitees
2. Attendee contact information

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)

2008 EPA Region 8 Federal Water Program Managers Meeting
6 June 2008, 0900-1400
Denver, CO

Location:

URS Office (Conference Room 1 Main, near receptionists)
9960 Federal Drive, Suite 300
Colorado Springs, CO 80921
791-531-0001

Invitees:

See next page

Overarching Meeting Goals:

- ❖ Discuss pressing water program requirements that concern all participants
- ❖ Provide input to U.S. EPA, Region 8, regarding the storm water permitting process
- ❖ Cross feed and share lessons learned that may benefit all participants

Agenda:

0900	Welcome/Logistics/H&S Moment	URS
0910	Opening Comments/Meeting Objectives	Ed Carver, HQ AFSPC/A7AQ
0920	Participant Introductions & Expectations	All
0930	Open Discussion	All
1130	Lunch Break (no-host, working lunch)	
1200	Continued Discussion	All
1345	Action Items Review	URS
1350	Participant Closing Comments/Schedule Next Meeting	All
1400	Adjourn	Ed Carver, HQ ASFPC/A7AQ

Documents for Review/Discussion:

- MS4 Permit Template
- MS4 Permitting Audit Questionnaire
- Minutes from 2 May 2008 Meeting

**2008 EPA Region 8 Federal Water Program Managers Meeting
Invited Attendees**

HQ AFSPC/A7AQ, Peterson AFB

Mr Ed Carver, Command Water Program
Manager

U.S. EPA

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

21 CES/CEVQ, Peterson AFB

Mr Dave Anderson, Environmental Quality
Manager

Ms Dana McIntyre, Water Program
Manager

50 CES/CEV, Schriever AFB

Mr Todd DeGarmo, Environmental Flight
Chief

Mr Albert Fernandez, Environmental
Program Manager

460 CES/CEV, Buckley AFB

Ms Janet Wade, Environmental Flight Chief

Ms Laurie Fisher, Water Program Manager

Mr Earl Mikula, Environmental Planning

Mr Dave Mooney, Chief, Environmental
Compliance

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, Dallas

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

Fort Carson

Ms Stephanie Carter, Water Program
Manager

U.S Air Force Academy

Mr Matthew Lewis, 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

Ms Lindsay O'Neill, Denver

Mr Eric Farrington, Denver

BOP

T Sheldrake, Denver

GSA

Ms Susan Grant, Denver

NIST

Ms Sonja Ringen, Boulder

Mr David Garrity, Boulder

Veteran's Administration

Mr Michael Adams, Denver

Mr Kenneth Nevling, Denver

**2008 EPA Region 8 Federal Water Program Managers Meeting
6 June 2008**

Attendee Addresses

Name	Address	Phone	E-Mail
Mr Dave Anderson	Environmental Quality Manager 21 CES/CEVQ 580 Goodfellow Street Peterson AFB, CO 80914	Comm: (719) 556-9328 DSN: 556-9328	david.anderson2@peterson.af.mil
Mr Jim Benner	Safety & Environmental Specialist Federal Bureau of Prisons FCI Englewood 9595 West Quincy Avenue Littleton, CO 80123	Comm: 3039851566, ext. 1331	j.benner@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/A7AQ 250 S. Peterson Blvd., Suite 224 Peterson AFB, CO 80914-4150	Comm: (719) 554-7717 DSN: 692-7717	ed.carver@peterson.af.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 Eric Farrington	Project Manager URS Corporation 8181 East Tufts Ave. Denver, CO 80237	Comm: (303) 740-2644	eric_farrington@urscorp.com

**2008 EPA Region 8 Federal Water Program Managers Meeting
6 June 2008**

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	Water Program Manager 460 CES/CEV 660 S. Aspen, Stop 86 Buckley AFB, CO 80011-9551	Comm: (720) 847-6308	laurie.fisher@buckley.af.mil
Mr David Garrity	Environmental Engineer National Institute of Standards and Technology 325 Broadway Stop 173.02 Boulder, CO 80305-3328	Comm: (303) 497-4577	david.garrity@nist.gov
Ms Susan Grant	Environmental Technician 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. 5278	susan.grant@gsa.gov
Mr David Gwisdalla	Senior Environmental Engineer Tetra Tech, Inc 7222 Commerce Ctr Dr, Ste 185 Colorado Springs, CO 80919	Comm: (715) 685-6974	david.gwisdalla@tetrattech.com

**2008 EPA Region 8 Federal Water Program Managers Meeting
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Attendee Addresses

Name	Address	Phone	E-Mail
Mr Alan L. Haataja	Safety & Environmental Specialist Federal Bureau of Prisons FCI Englewood 9595 West Quincy Avenue Littleton, CO 80123	Comm: 3039851566, ext. 1331	ahaataja@bop.gov
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
Ms Dana McIntyre	Water Program Manager 21 CES/CEVQ 580 Goodfellow Street Peterson AFB, CO 80914-2370	Comm: (719) 556-7088 DSN: 834-7088	dana.mcintyre@peterson.af.mil
Mr Dave Mooney	Chief, Environmental Compliance & Quality 460 CES/CEVC 660 S. Aspen St., Stop 86 Buckley AFB, CO 80011-9551	Comm: (720) 847-9044 DSN: 847-9044	john.mooney@buckley.af.mil
Mr Corwin Oldweiler	Contract Support 460 CES/CEV Bureau Veritas NA 660 S. Aspen, Stop 86 Buckley AFB, CO 80011-9551	Comm: (720) 847-4655 DSN: 847-4655	corwin.oldweiler.ctr@buckley.af.mil
Ms Lindsay O'Neill	Environmental Scientist URS Corporation 8181 East Tufts Avenue Denver, CO 80237	Comm: (303) 740-3983	lindsay_o'neill@urscorp.com

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6 June 2008**

Attendee Addresses

Name	Address	Phone	E-Mail
Mr Jerry Thompson	Natural/Cultural Program Manager 50 CES/CEV 300 O'Malley Ave, Suite 19 Schriever AFB CO 80912-5019	Comm: (719) 567-3356 DSN: 560-3356	jerry.thompson@schriever.af.mil
Ms Melissa Trenchik	Environmental Biologist 50 CES/CEV 300 O'Malley Ave, Suite 19 Schriever AFB CO 80912-5019	Comm: (719) 567-3360 DSN: 560-3360	melissa.trenchik@schriever.af.mil