



Confirmation Notice
AFSPC ESOHCAMP and Training/Workshop Support
No. CN CK56-013

Date: 7 May 2008	Submitted By: Denise Seery
Contract No.: FA4890-04-D-0005	Task Order No.: CK56
URS Project No.: 22239853.11000	
Subject: Documentation of the EPA Region 8 DoD Water Program Managers Meeting (sponsored by HQ AFSPC/A7AQ), 2 May 2008	
Location: URS-Denver Office	
Meeting Date: 2 May 2008	
Planners/	Ed Carver, HQ AFSPC/A7AQ
Participants:	Julie Van Dusseldorp, Lindsay O'Neill and Eric Farrington, URS Meeting Attendees (see Attachment 2)
Summary: This confirmation notice documents the completion of a Region 8 DoD Water Program Managers Meeting, 2 May 2008.	

Headquarters Air Force Space Command (HQ AFSPC) sponsored an Environmental Protection Agency (EPA) Region 8 Department of Defense (DoD) Water Program Managers Meeting on 2 May 2008 at the URS office in Denver, CO. Staff from URS' Denver office supported the preparations for this meeting, and Mr. Eric Farrington from URS provided meeting facilitation. Fourteen 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 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. Carver opened the meeting with a review of the previous meeting and the meeting agenda. Mr. Greg Davis from EPA was welcomed. Requirements of the new Municipal Separate Storm Sewer System (MS4) permits and a review of the draft template were identified as focus topics for the meeting. Meeting attendees were introduced.
2. Mr. Davis discussed that the existing Construction General Permit will likely be extended this summer for two years without changes and likely in place, before the change of administration. There will be no need for a new Notice of Intent for projects underway.
3. Effluent guidelines for the construction industry will be proposed for the next Construction General Permit after this summer's permit renewal (2010). Numeric turbidity limits for large construction (likely 50 acres or greater) and sampling requirements with potential waivers for small particle size will likely be included. Compliance will be required within 90 days of the new permit start date. These proposed requirements are all still internal at the EPA, with the size of sites not set yet. More details will be available when the federal register notice comes out in about two weeks.
4. Mr. Davis also discussed the Industrial Multi-Sector General Permit (MSGP) and issues with allowing new discharges to impaired waters. The new permit is still in draft for reviewing



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language edits and could be approved any day. Because of the National Resources Defense Council lawsuit, he stated that discussions are trending toward no new discharges to impaired waters and requiring an individual National Pollutant Discharge Elimination System (NPDES) permit instead of a General Permit. The distance to an impaired water is not defined. This would probably apply to discharges within one mile of an impaired water, but really includes all discharges that would “eventually” reach impaired waters.

5. The new Industrial Stormwater Permit is Region 8 specific, and not part of the national permit, due to a request from Indian country tribes. Mr. Davis stated that the MSGP and MS4 would not be combined and that the new MSGP is the same as the public notice version (12/2006), except for the impaired waters language. A copy of the 2006 draft permit was included as Attachment 3 and transmitted in a separate e-mail. The Storm Water Pollution Prevention Plans (SWPPP) must be submitted with the MSGP application and SWPPPs are not approved but certified complete. Permit coverage is not obtained until a certified complete SWPPP is received.
6. Mr. Davis stated that the 2006 MS4 permit for the Pocatello Urbanized Area in Idaho that was issued by EPA Region 10 will be used as the template for the new federal-facility permits in Colorado because it has already withstood legal challenges and will provide consistency between EPA regions. Region 8 federal MS4 permits will be developed as Individual Permits and not as a General Permit. The Region 10 MS4 permit in Idaho is a first-issue draft so many of the new permits will refer to “continued implementation” instead of program development for items such as Illicit Discharge, Public Education and Outreach, and Public Involvement and Participation.
7. It was discussed that although Colorado Department of Public Health and Environment (CDPHE) issued their second-round general permit while the vague “maximum extent practicable” language was still used, new federal-facility permits will be more stringent. It will likely be 5-10 years before the state and federal requirements are the same. The Colorado permit has to be rewritten by 2012 at the latest. Mr. Carver mentioned that federal facilities being held to a more stringent standard may become a legal issue. Mr. Davis explained that the goal of the EPA is to use the federal facilities as an example for the country with more stringent permits for all others to follow.
8. The group discussed requiring stormwater monitoring in the new MS4 permit. Mr. Davis stated that it is important to have downstream data to know what is being contributed, and it can help to determine the effectiveness of the stormwater program. He suggested that any required monitoring would be the standard stormwater suite in order to determine the effectiveness of the program, relative contribution to downstream receiving waters and MS4s, and demonstrate a baseline for improvement. Mr. Davis stated that he is not 100 percent committed to including monitoring in the new permit and is open to suggestions for achieving



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the same goal. The group expressed concern that monitoring would be complicated by intermittent streams, funding could be a problem, and that monitoring should be tied to goals. It was discussed that as part of the new MS4 permits, bases could submit proposed base-specific monitoring plans including suspected pollutants of concern, locations, and scheduling to the EPA for approval. Mr. Davis stated that an end-of-pipe habitat walk should be included and quantitative standards could possibly be phased out over time. Goals of the Storm Water Management Program (SWMP) should be used to determine sampling priorities.

9. The requirements of the Energy Independence and Security Act of 2007 were discussed. This Act requires all development projects greater than 5,000 square feet to retain historical hydrology to the maximum extent "technically feasible." Mr. Davis stated that this new Act is law and will be included in the new MS4 permits. There is no schedule for the EPA to codify or release guidance for this new law. Discussion of the new law raised concern about water rights. It was stated that containment would be an issue but detention (not retention) may be okay, and that otherwise a Water Court decree would be necessary. Region 10 is prepared to propose the same permit requirements for federal facilities as Region 8 in order to keep the regions consistent. Mr. Carver stated that he would request an Air Force or DoD policy statement/ordinance on the new Energy Act.
10. The schedule for program audits by Mr. Davis was discussed. Mr. Davis will be conducting audits of all Region 8 federal MS4 facilities. There is no set schedule; however a minimum of 2 audits and permits per year must be completed. The Department of Commerce in Boulder and Veterans Administration Hospital must be completed by 30 August 2008. Peterson Air Force Base (AFB) and Fort Carson volunteered to be next. The new permits will be staggered over the next four years and compliance dates (date of permit issue) will be different for each facility. Mr. Carver stated he would start sending proposed permit requirements up the chain-of-command for implementation at all bases as soon as the first permit is issued. Mr. Davis will develop a standard audit questionnaire to be distributed to all federal facilities and completed by the facilities before audits begin. The questionnaire will request information on all industrial facilities, persons in charge, permitting at construction sites, enforcement mechanisms, inspections, maintenance of post-construction BMPs, and stream surveys.
11. Mr. Davis stated that bases would need to demonstrate funding to maintain post-construction BMPs, and that it can be important to find deficiencies during audits in order to use them to gain funding. Mr. Carver stated that funding would need to be addressed on a corporate level and that headquarters is looking at a shift from "environmental requirements" to regular maintenance practice.
12. It was discussed that enforcement will be based on what is written in the permits and the audits are only for internal development of the new permits. Mr. Carver identified three requirements that constitute and enforcement action for the Air Force: (1) the finding is in



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writing, (2) it cites non-compliance with a specific regulation, and (3) it sets a requirement to take action in a set time frame. Mr. Carver expressed a need to have maximum flexibility with the audits to avoid enforcement actions.

13. Grandfathering of projects when the new permit is issued was discussed. Mr. Davis suggested writing grandfathering language with group input into the permit draft, which would be approved through Public Notice. There will be no retroactive mechanism for projects completed before the permit issue date.
14. The group continued discussion of items in the EPA Region 10 MS4 permit in Idaho. Requirements from other state regulations will not be applicable, but if there are similar Colorado standards they will be used. Mr. Davis is not planning on including any effluent limits and prefers to require monitoring to determine existing levels and look for red flags. He would like to prohibit use magnesium chloride application for dust suppression within 25 feet of stormwater. No limits are planned for snow removal/disposal. It was clarified that snow piles can be put near a storm inlet but not dumped directly into the MS4.
15. Mr. Davis discussed that requirements for construction stormwater would be a combination of continuing existing programs and adding new requirements as necessary based on annual reports. Existing programs should be functioning by year 5 of the permit cycle and should include adequate guidance, oversight, and enforceable mechanisms. Mr. Davis stated that stop work orders or blacklisting contractors are ideal mechanisms for enforcement. It was discussed that mechanisms are in place but education and outreach is needed to get contracting officers and commanders to use the mechanism. Mr. Carver stated that the decision to issue stop work orders and risk management should be elevated to the Commander. As the new permits get closer, base briefings and training for all parties involved will be necessary. Web-based training was discussed as an option for this goal.
16. It was discussed that each facility needs to have guidance, oversight, and a performance specification for post-construction. In relation to the Energy Act, Mr. Davis stated that modeling will be needed to determine drainage and pre/post-construction runoff volume based on one type of storm, then used to design pre- and post-construction runoff to match. Fort Carson uses an XP SWMM model to manage projects and generate the specifications needed to meet standards.
17. The group discussed the possibility of making housing co-permittees on the MS4 permit to prevent them from discharging sediment to the MS4. Fort Carson has a binding agreement with lease holders that requires them to follow stormwater rules. Mr. Carver will elevate the issue of jurisdiction of tenant/privatization to the legal department. Mr. Davis stated that he would help ensure the Army Corps of Engineers communicates with the MS4.



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18. It was discussed that industrial activity will be treated in the same way as construction activity in the new permits. No-exposure exemptions will still apply and industrial processes outside the MS4 boundaries will not be regulated under the new permits. Mr. Davis stated he would use the federal facility boundary to determine the MS4 permit boundary, although there was confusion about how this would apply to federal facility areas geographically separated. In most cases, the MS4 boundary will be the contiguous property of the main base.
19. The group discussed that the next step is for Mr. Davis to begin developing permit language to be sent out to the group for discussion, after which another group meeting will be held for further feedback and discussion. Monthly group meetings leading up to the 30 August 2008 deadline were discussed. Mr. Davis stated it would be beneficial for all facilities to submit a description of their construction process before he drafts the permit language. Mr. Davis also expressed a desire to include all other Colorado federal facilities (e.g., Veterans Administration, Department of Commerce, Federal Center, etc.) in future meetings.
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	9	Engage conversation for a policy statement/ordinance on the Energy Act.	Mr. Carver HQ AFSPC/A7AQ	
2	10	Develop permit audit questionnaire for all facilities to complete.	Mr. Davis Region 8 EPA	Week of 26 May
3	17	Elevate jurisdictional issues with privatized portions of the installations to legal department.	Mr. Carver, HQ AFSPC/A7AQ	
4	19	Submit construction program process to Mr. Davis.	All Water Program Managers	Week of 19 May
5	19	Develop permit language based on questionnaires and construction program details.	Mr. Davis Region 8 EPA	Week of 26 May
6	19	Submit list of additional contacts to be included in future meetings.	Mr. Davis Region 8 EPA	Week of 19 May
7	19	Work out issues and provide all feedback for permit drafts to Mr. Davis	All Parties	Week of 18 August

ATTACHMENTS:

1. Meeting Agenda and List of invitees
2. Attendee Contact Information
3. Draft 2006 Region 8 Industrial Stormwater Permit



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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 Region 8 DoD Water Program Managers Meeting

2 May 2008, 0900-1400

Denver, CO

Location:

URS Office (Conference Room 4 Main)
8181 East Tufts Ave.
Denver, CO 80237
303-694-2770

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	Opening Discussion	All
1000	Morning Break	
1010	Discussion with Greg Davis, U.S. EPA, Region 8	All
1130	Lunch Break (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

Topics for Discussion:

- Draft MS4 permit template
- Post-construction water quality requirements (quantity vs. quality)
- Post-construction BMP expectations (performance-based vs. design criteria)
- Effectiveness and documentation of measurable goals
- Public Education/Outreach and Public Involvement/Participation
- Illicit discharge detection and elimination
- Grandfathering projects designed/awarded before new permit dates
- Industrial processes outside the MSGP and applicability of no-exposure exemptions in MS4
- Special considerations for permitting process at federal facilities

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



2008 Region 8 DoD Water Program Managers Meeting

Invited Attendees

HQ AFSPC/A7AQ

Mr Ed Carver, Command Water Program Manager, Peterson Air Force Base

U.S. EPA

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

21 CES/CEVQ

Mr Dave Anderson, Environmental Quality Manager, Peterson Air Force Base

Ms Dana McIntyre, Water Program Manager, Peterson Air Force Base

50 CES/CEV

Mr Todd DeGarmo, Environmental Flight Chief, Schriever Air Force Base

Mr Albert Fernandez, Environmental Program Manager, Schriever Air Force Base

460 CES/CEV

Ms Janet Wade, Environmental Flight Chief, Buckley Air Force Base

Ms Laurie Fisher, Water Program Manager, Buckley Air Force Base

Mr Earl Mikula, Environmental Planning, Buckley Air Force Base

Mr Dave Mooney, Chief, Environmental Compliance, Buckley Air Force Base

Mr Corwin Oldweiler, Water Program Contract Support, Buckley Air Force Base

721 MSG/CEV

Mr Jason Cook, Environmental Flight Chief, Cheyenne Mountain Air Force Station

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

Colorado Air National Guard

Ms Dee Hawkins, Environmental Manager

Colorado Army National Guard *(unable to attend due to their national conference that week)*

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, Fort Carson

U.S Air Force Academy

Mr Matthew Lewis, Water Program Manager, U.S. Air Force Academy

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



2008 Region 8 DoD Water Program Managers Meeting
02-02 May 2008

Attendee Addresses

Name	Address	Phone	E-Mail
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
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
Mr Albert Fernandez	Environmental Program Manager 50 CES/CEV 500 O'Malley Ave, Suite 19 Schriever AFB, CO 80912-5019	Comm: (719) 567-4026 DSN: 560-4026	albert.fernandez@schriever.af.mil



2008 Region 8 DoD Water Program Managers Meeting
02-02 May 2008

Attendee Addresses

Name	Address	Phone	E-Mail
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
Ms Dee Hawkins	Environmental Coordinator 140 CES/CEV COANG 18848 E. Crested Butte Ave., Stop 80 Buckley AFB, CO 80011-9551	Comm: (720) 847-9100	verdeda.hawkins@cobuck.ang.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
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

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2008 Region 8 DoD Water Program Managers Meeting
02-02 May 2008

Attendee Addresses

Name	Address	Phone	E-Mail
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
Mr Benjamin Recker	Environmental Engineer Tetra Tech 7222 Commerce Ctr Dr, Ste 185 Colorado Springs, CO 80919	Comm: (719) 685-6585	benjamin.recker@tetrattech.com
Ms Julie Van Dusseldorp	Environmental Scientist URS Corporation 8181 East Tufts Avenue Denver, CO 80237	Comm: (303) 796-2779	julie_vandusseldorp@urscorp.com