

NPDES General Permit for Storm Water Discharges From Construction Activities

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NOI Submitted Date: January 03, 2008		Status: Active	
		Date Discharge Active: January 10, 2008	
I. Permit Number			
General Permit Number: COR10000F			
Tracking Number for this Project: COR10CK3F			
II. Operator Information			
Name: HUNT BUILDING COMPANY, LTD.			
Street: 4401 N. MESA			
City: EL PASO	State: TX	Zip Code: 79902-1107	
Phone: 915-533-1122			
III. Project/Site Information			
Project/Site Name: AIR FORCE ACADEMY PPV HOUSING			
Project Street/Location: 4700B E. PONDEROSA DRIVE			
City: USAF ACADEMY	State: CO	Zip Code: 80840	
County or similar government subdivision: El Paso			
Latitude: 38.9929		Longitude: 104.8799	
Project Located in Indian country? No		Territory:	
Estimated Start Date: December 10, 2007		Estimated Completion Date: October 30, 2009	
Estimated Area to be Disturbed (to the nearest quarter acre): 30.5			
IV. SWPPP Information			
SWPPP Contact Name: BRUCE JACKSON			
Location of SWPPP for viewing: Address in Section III			
Email: BRAD.CASH@HUNTCOMPANIES.COM			
V. Discharge Information			
Receiving Water: FOUNTAIN CREEK WATERSHED			
Consistent with TMDL: Yes			
VI. Endangered Species Information			
I have satisfied permit eligibility with regard to protection of endangered species through the indicated section of Part I.B.3.e(2) of the permit under criterion A.			
VII. NOI Certification Information			
Certified By: BRAD CASH		Signed?: Date: January 03, 2008	
		Yes	
Postmark Date: January 03, 2008			

Summary of Findings and Corrective Actions

Facility: AFA Privatize Housing
Hunt Building Company, Permittee
Permit #: COR10CK3F
Inspection Date: 5/5/08

Findings	Corrective Action Needed
<p>1. A copy of the permit was not available on site.</p>	<p>Part 3.12.A of the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges from Large and Small Construction Activities (SW General Permit) states that a “copy of the SWPPP (including a copy of the permit), ... must be retained at the construction site..”</p> <p>The operator printed out a copy of the permit from the EPA website while inspectors were on site.</p>
<p>2. The Pine Valley Storm Water Pollution Prevention Plan (SWPPP) certification page was not signed.</p>	<p>Part 3.12.D of the SW General Permit states that all “SWPPPs must be signed and certified in accordance with Appendix G, Section 11.</p> <p>Hunt Building Company (Hunt) is requested to review and certify the Pine Valley SWPPP as required by the SW General Permit. The certification must be submitted to EPA in Hunt’s response to the inspection report and this Summary of Findings.</p>
<p>3. The NOI does not cover all the ground disturbance activities occurring at Douglass Valley and Pine Valley. The site map shows areas where demolition and/or new construction would occur. Areas where renovations/additions were occurring were not shown on the map and were not included in the NOI. “Renovation/addition” as described by facility representatives includes building expansion, i.e., foundation extensions to the existing structure. These “renovation/addition” resulted in ground disturbance activities.</p> <p>The SWPPPs’ site descriptions state larger areas of ground disturbance activities than the area state in the Notice of Intent (NOI).</p>	<p>Part 3.3 of the SW General Permit outlines the “site and activity description” required in the SWPPP.”</p> <p>Hunt is requested to review and update the SWPPP and maps to correctly state/show <u>all</u> areas of ground disturbance activities.</p> <p>In a separate map, Hunt is requested to specifically identify the areas where “renovation activities” that caused any ground disturbance occurred or will occur, including the staging areas. The map should also indicate if these areas were included in the 30.5 acres identified in the NOI.</p> <p>The updated SWPPP and map must be submitted to EPA in Hunt’s response to the inspection report and this Summary of Findings.</p>

<p>4. The SWPPPs do not adequately address controls for non-construction pollutants. The SWPPP does not identify port-o-lets at the Douglass and Pine Valley sites. The port-o-lets and the applicable BMP are not discussed in the SWPPP. The port-o-lets were not anchored.</p>	<p>Part 3.4 of the SW General Permit states the "SWPPP must include a description of pollutant sources from areas other than construction..." and "description of controls and measures that will be implemented..."</p> <p>Hunt is requested to review Part 3.4 of the SW General Permit and update the SWPPP to include information regarding port-o-lets and to correct deficiencies in the implementation of pollutant discharge prevention. Documentation, including photos, on how this deficiency is address should be provided in Hunt's response to the inspection report and this Summary of Findings.</p>
<p>5. The SWPPP does not include the endangered species review.</p>	<p>Part 3.7 of the SW General Permit states that the "SWPPP must include documentation supporting a determination of permit eligibility with the Endangered Species.</p> <p>Hunt is requested to review Part 3.7 of the SW General Permit and update the SWPPP to include all required information outlined in Part 3.7. The updated SWPPP must be submitted to EPA in Hunt's response to the inspection report and this Summary of Findings.</p>
<p>6. The inspection reports indicated the BMPs that needed repair. The reports did not document if all the areas of ground disturbance activities were inspected or if all the BMPs that should have been implemented were inspected.</p>	<p>Part 3.10.G of the SW General Permit outlines the minimum elements for the inspection report.</p> <p>Hunt is requested to review Part 3.10.G of the permit and include all the required information in each inspection report. A copy of the inspection format should be submitted in the response to the inspection report and Summary of Findings. Copies of all inspections conducted in May and June 2008 should be included in the response.</p>
<p>7. Hunt obtains weather data from the "weather underground website."</p>	<p>The AFA is a very large area and weather patterns may differ throughout the AFA. EPA recommends that Hunt maintain a weather gage at each site (Douglass Valley and Pine Valley) to confirm the precipitation data obtained from the website.</p>

<p>8. Section 2.c. of the Douglass Valley SWPPP and Section 2.c. of the Pine Valley SWPPP state that Hunt “has responsibility under the Municipal Separate Storm Sewer System (MS4) permit for coordinating the implementation of appropriate erosion and sediment control best management practices for construction activities that are required to minimize the risk of storm water contamination.”</p>	<p>The EPA inspectors do not have information of an MS4 permit issued to Hunt for storm water activities at the AFA. Therefore, Hunt is requested to respond to the following questions:</p> <p>a. Does Hunt have an MS4 permit or is it a co-permittee to an MS4 permit for storm water activities at the AFA? If so, please provide the permit application, notification of the permit number, a copy of the MS4 SWPPP, and the last annual report.</p> <p>b. If Hunt has an MS4 permit, how did Hunt coordinate with the AFA? Specifically,</p> <ol style="list-style-type: none"> 1) Is the coverage area in the MS4 permit for the entire Douglass Valley (290 acres) and Pine Valley (212 acres) or only the 30.5 acres stated in the Notice of Intent (NOI) for COR10CK3F? 2) Is there land (that is not part of the housing area and/or subject to the AFA’s jurisdiction) between Douglass Valley and Pine Valley? Provide a map showing the location of Douglass Valley and Pine Valley and any other housing area at AFA where Hunt may have current or future activities. 3) Are the boundaries of Douglass Valley and Pine Valley specifically delineated to state who has responsibility to implemented the Hunt MS4 permit, and 4) What are Hunt’s specific responsibilities for implementing its MS4 permit at Douglass Valley and Pine Valley? <p>c. If Hunt does not have an MS4 permit, what does the language “has responsibility under the Municipal Separate Storm Sewer System (MS4) permit...” mean?</p> <p>d. If Hunt does not have an MS4 permit, what coordination has been done with the AFA. (The AFA has an MS4 permit and is responsible for the all drainage and storm water systems within the AFA.)</p> <ol style="list-style-type: none"> 1) Provide the dates and any documentation of meeting(s) with the AFA on coordination effort(s). 2) Provide information on the parties/persons that attended the coordination meetings, etc. 3) What agreements/procedures/process have been reached to ensure compliance with the AFA’s MS4 permit?
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<p>9. The following BMP deficiencies were observed:</p> <ul style="list-style-type: none"> - The sediment logs were not trenched in to prevent sediment from going beneath the logs, - The sediment logs may not have been the appropriate BMP in the staging area where sand was observed beneath and outside the sediment logs. There was no BMP around another sand pile that was upstream from a storm drain, - Rock socks casings were torn/damaged, - storm drains in the swales at Pine Valley were not protected from the construction debris, especially from the asbestos contamination due to the demolition activities, and - Sediment loading onto the streets in Douglass Valley and Pine Valley. 	<p>Part 3.13 of the SW General Permit states that "...all control measures must be properly selected, installed, and maintained in accordance with any relevant manufacturer specifications and good engineering practices... If sediment escapes the construction site, off-site accumulations of sediment must be removed at a frequency sufficient to minimize off-site impacts."</p> <p>Hunt is requested to review all BMPs on site and correct any deficient BMPs. Documentation, including photos on when and how the BMPs were corrected must be provided in Hunt's response to the inspection report and this Summary of Findings.</p> <p>Hunt must include a review of any discharge of asbestos material to the drainage to West Monument Creek. Documentation of this review must be provided in the response to this report. If a cleanup is necessary, the schedule for the cleanup must also be provided.</p>
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NPDES Storm Water Inspection - Construction

<u>National Database Information</u>				<u>General</u>			
Inspection Type	storm water			Inspector Name	Lee Hanley		
NPDES ID Number	COR 10CK3F			Telephone	303-312-6555		
Inspection Date	5/5/08			Inspector Name	Liz Fagen		
Inspector Type <i>(circle one)</i>	EPA		State	Telephone	303-312-6095		
			EPA Oversight	Entry Time	2:12 pm		
Facility Type <i>(circle one)</i>	Residential			Exit Time	6:53 pm		
<u>Facility Location Information</u>							
Name/Location/ Mailing Address	Mail Report to: Hunt Building Company 4700B E. Ponderosa Dr. USAFA, CO 80840						
GPS Coordinates	Latitude	39.99207N		Longitude	104.85679W		
Receiving Water(s)	Douglass Valley -AFA (storm drains) MS4 to Monument Creek Pine Valley - storm drains and swales to drainage to West Monument Creek						
Disturbed Area	30.5 acres per NOI	Start Date	1/3/08		Stop Date	still in construction (10/09 per NOI)	
<u>Contact Information</u>							
	Name(s)				Telephone		
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Hunt Building Company						
Facility Contact	Gary Bain, Project Manager/Superintendent (beginning 5/8/08) Bruce Jackson, Project Engineer Ben Mendoza, Project Engineer				719-472-8569 x12 (office) 915-603-0668 (cell)		
Authorized Official(s)	Brad Cash, Project Manager						
<u>Site Information:</u>							
Nature of Project	Residential	Commercial/Industrial	Roadway	Private	Federal	State/Municipal	Other
Construction Stage	Clearing/Grubbing	Rough Grading	Infrastructure	Building Const.	Final Grading	Final Stabilization	
<u>Basic Permit Information</u>				<u>Basic SWPPP Information</u>			
Permit Coverage	Y		N		SWPPP Prepared & Available	Y N	
Permit Type	General		Individual		SWPPP Contents Satisfactory	Y N	
Permit notice/sign visibly posted including: copy of NOI, contact name & phone number, location of SWPPP	N - Facility had the NOI application without the permit number.				SWPPP Implementation Satisfactory	Y N	
NOI Date	01/03/08				SWPPP Date	12/4/07	
If applicable, is waiver certification & approval on file?			N/A		<i>Intentionally left blank</i>		

NPDES Storm Water Inspection - Construction

SWPPP Review		
<u>General</u>	Notes:	
Is there a SWPPP?	Y	
SWPPP completed prior to NOI submission?	Y	NOI dated 1/3/08, SWPPP dated 12/4/07; SWPPP signed on 12/5/07.
Copy of permit language?	N	A copy of the permit was not available on site. The operators printed out a copy from the EPA website, while inspectors were on site.
Is SWPPP consistent with state/tribal/local regulations and permits?	NA	Construction project on Federal land and a Federal NPDES permit applies.
SWPPP updated to incorporate changes to State, Tribal, Local erosion plans?	NA	Construction project on Federal land and Federal NPDES permit applies.
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	NA	Project still under construction.
Is a copy of the SWPPP on site or made available?	Y	
Did all "operators" sign/certify the SWPPP?	N	There is a SWPPP for Douglass Valley and one for Pine Valley. The SWPPPs designate Hunt Building Company (Hunt) as the operator for each site. The Letter of Certification was not signed for Pine Valley; it was signed for Douglass Valley.
<u>Site Description</u>	Notes:	
SWPPP identifies potential sources of pollution?	Y	
SWPPP identifies all operators and their areas of control?	N	<p>SWPPP identifies Hunt as the general contractor and Brad Cash, as the contact.</p> <p>Section 2.c. of the Douglass Valley SWPPP and Section 2.c. of the Pine Valley SWPPP state that Hunt "has responsibility under the Municipal Separate Storm Sewer System (MS4) permit for coordinating the implementation of appropriate erosion and sediment control best management practices for construction activities that are required to minimize the risk of storm water contamination."</p> <p>The EPA inspectors are not aware of an MS4 permit issued to Hunt. The AFA has an MS4 for the entire AFA Base. According to the AFA Environmental Office, there has been no coordination between Hunt and the AFA on storm water or other the environmental issues. The inspection report will ask Hunt to explain the Section 2.c. language in the Douglass and Pine Valley SWPPPs.</p>
Is there a site description?	Y	There are two SWPPPs, one for Douglass Valley and one for Pine Valley. See below on the issues regarding the site description.
Nature/sequence of construction activity?	Y	

NPDES Storm Water Inspection - Construction

<u>Site Description</u>	<u>Notes:</u>	
Total area of site and total area to be disturbed?		<p>The NOI states 30.5 acres would be disturbed. The NOI does not include areas where renovations/additions were also occurring. The NOI does not appear to cover all the ground disturbance activities occurring at Douglass Valley and Pine Valley.</p> <p>The Douglass Valley SWPPP states the project area consist of 180 acres in the main Douglass Valley area, 100 acres in the officer's quarters, and 10 acres in the New Douglass Valley area. The site map shows areas where demolition and/or new construction would occur. Areas where renovations/additions were occurring are not highlighted on the map and not included in the NOI.</p> <p>The construction activities at Pine Valley are in three stages. The first phase would include the demolition of single family units on 52 acres. The site map shows the demolition and construction of one building. The SWPPP, however, stated no construction activities are planned for Pine Valley.</p>
Is there a general location map?	Y	A location map was posted on the trail wall. The SWPPP does not reference this map.
Is there a site map?	Y	A living map was posted on the trailer walls.
Drainage patterns/outfalls on site map?	Y	The drainage pattern for the storm drains are noted in the Erosion & Sediment Control Plan.
Area of soil disturbance on site map?	N	The living map shows the location of where construction activities in Douglass Valley and where demolition at Pine Valley are occurring. The operators indicated where "renovation" activities were occurring; these activities are not considered ground disturbance activities in the SWPPP.
Location of major structural controls on site map?	Y	However, the BMPs installed and specifications changes were not updated on the Erosion Control Plans or on the living map. References to the Erosion Control Plan or the living map are not in the SWPPP.
Location of storm water discharges to a surface water on site map?	N	No surface water was identified on the SWPPP maps.
Location of materials or equipment storage on site map (on-site or off-site)?	Y	The living maps showed the location for stockpile management, solid and demolition waste management, areas for handling and disposal of concrete and cement, and material delivery areas.
Location/description industrial activities?	NA	No industrial activity is occurring with this project.
Name of Receiving water(s) or MS4 listed?	Y	Section 4.a(2)iii of the Pine Valley SWPPP states discharge is to West Monument Creek and an unnamed intermittent stream drain and eventually to Monument Creek. Section 4.a(2)iii of the Douglass Valley SWPPP states drainage is to Douglass Valley Stream, then to Monument Creek and eventually to Fountain Creek.
Does the SWPPP include dates of major grading activities, temporary/permanent construction cessation, and initiation of stabilization practices?	Y	Both SWPPPs include sequence and duration of construction and demolition activities. Hunt also maintains "Construction Activities Records" that provide specific dates of when the activities occurred.
Endangered Species Documentation?	N	The SWPPP text referenced a letter documenting compliance with the endangered or threatened species review requirement. Review of the reference letter indicated that the facility will coordinate with the AFA on this review. As of the date of the EPA inspection, there has been no coordination with AFA on the Hunt project; therefore, no endangered species documented review.

NPDES Storm Water Inspection - Construction

<u>Controls to Reduce Pollutants</u>	<u>Notes:</u>	
Does the SWPPP include a description of all pollution control measures (BMPs) that will be implemented to control pollutants in storm water discharges, including sequence and which operator responsible for implementation?	Y	The BMPs used at both Douglass Valley and Pine Valley sites are described in the SWPPPs and are identified on the living map.
Does the SWPPP include a description of interim and permanent <i>stabilization practices</i> (e.g., seeding, mulching, riprap for the site)?	Y	The SWPPP stated stabilization measure shall be initiated no more than 14 days after construction activities have ceased.
Does the SWPPP identify the contractor(s) and timing by which <i>stabilization practices</i> will be implemented?	Y	The SWPPP has general descriptions on what stabilization practices will be implemented.
Does the SWPPP include a description of <i>structural practices</i> (e.g., vehicle track-out, silt fences, sediment traps, storm drain inlet protection) for the site?	Y	
Does the SWPPP identify the contractor(s) and timing by which <i>structural practices</i> will be implemented?	N	The SWPPP provided general timelines for BMP implementation but was not updated for changed conditions (i.e., asbestos debris to storm drains in Pine Valley).
Does the SWPPP identify storm water management measures to address storm water runoff once the construction is completed (e.g., retention ponds, velocity dissipation controls)?	N	<p>No management measurements specified after construction is completed.</p> <p>The SWPPP for Pine Valley indicated only demolition would occur, no construction. According to Hunt representatives, the AFA's Superintendent's house will be built once demolition is completed.</p> <p>The Pine Valley and Douglass Valley will be managed by "privatized housing" not the AFA. No information is included in the SWPPP on how storm water will be managed by the "privatized housing" entity.</p>
Does SWPPP describe measures to prevent discharge of dredge/fill materials to waters of the U.S.? Does site have 404 permit?	NA	
Does SWPPP describe measures to minimize off-site vehicle tracking and generation of dust?	Y	
Does SWPPP describe controls for pollutants from storage of construction or waste materials?	Y	
Does the SWPPP describe controls for pollutants from non-construction activities?	Y	
Does SWPPP identify allowable non-storm water discharges?	N	Port-o-lets were not identified in the SWPPP.
Does SWPPP ensure implementation of pollution prevention measures for non-storm water discharges?	Y	SWPPP identified dust control water.

NPDES Storm Water Inspection - Construction

Is SWPPP revised when BMPs added/modified within 7 days after inspection reveals problems?			<p>The Pine Valley SWPPP states the SWPPP shall be amended whenever there is a change in design, construction, operation, maintenance at the construction site. The SWPPP was not amended to note the asbestos contamination due to the demolition efforts. The SWPPP was not amended to indicate that construction will in fact occur at Pine Valley (as noted in the site map).</p> <p>The Douglas Valley SWPPP does not include the "renovation" activities that include additions to existing building that resulted in ground disturbance activities.</p>
Inspections			Notes:
Inspections performed once every 7 days, or every 14 days within 24 hours of a rain event greater 0.5"?	Y		The SWPPPs state inspections would be conducted once every seven (7) calendar days. The records showed inspections were conducted every 7 days.
Inspections performed by qualified personnel?	Y		The SWPPPs states Bruce Jackson is the designated SWPPP inspector. The SWPPPs states Mr. Jackson has three years in the construction industry involving a variety of earthwork projects and is familiar with erosion and sediment control techniques.
All disturbed areas and/or used for storage and exposed to rain inspected?	unknown		The facility had an inspection form. However, the report only noted when BMP repairs were needed, not where the BMP deficiencies were observed and need repair.
All pollution control measures inspected to ensure proper operation?	unknown		The facility had an inspection form. However, the report only noted when BMP repairs were needed, not what BMPs.
All discharge locations inspected if accessible, or if not accessible, are nearby downstream locations inspected?	unknown		The facility had an inspection form. However, the report only noted when BMP repairs were needed.
Entrance/exit inspected for off-site tracking.	unknown		The facility had an inspection form. However, the report only noted when BMP repairs were needed.
Inspection report contain all required items and certified?		N	<p>The permit states that a record of each inspection and of any action taken in accordance with the inspection requirements must be retained as part of the SWPPP. In addition, the inspection report must at a minimum include the location(s) of BMPs that need to be maintained, locations(s) of BMPs that failed to operator as designed or proved inadequate for a particular location.</p> <p>The facility had an inspection form. the reports occasionally provided general descriptions on the location of the BMP needing repair. The reports did not indicate when the repair or replaced BMP occurred.</p>

NPDES Storm Water Inspection - Construction

Site Description/Review:

Site Description :

The Hunt Building Company, LTD (Hunt) is demolishing existing building, renovating other building, and constructing some buildings in two housing areas within the Air Force Academy:

Douglass Valley:

Douglass Valley is 180 acres in the main Douglass Valley area, 100 acres in the officer's quarters, and 10 acres in the New Douglass Valley. The project will construction 33 new single-family homes, renovate 299 single family units and demolish approximately 139 single family units. Douglass Valley is located on the south central part of the AFA, south of Academy Drive and south of the base golf course.

Pine Valley:

Pine Valley is approximately 212 acres. Approximately 494 single family units would be demolished in three phases (52, 90, 70 acres respectively) starting December 2007 and completed in 2011. Pine Valley is located on the southern side of the AFA, south of Pine Drive and west of the flight line and the Air Academy High School. The SWPPP states that no construction activities are planned for Pine Valley. The SWPPP map, however, shows one new construction, the Dean's Quarter. The SWPPP does not recognize demolition as a ground disturbance activity. Further, the SWPPP, p 6, states no CGP is required because the project is located on USAFA grounds.

The NOI states the estimated disturbed area is 30.5 acres. The above site description is not consistent with the NOI.

The area in Douglass Valley drains to storm drains that eventually discharge to Monument Creek. The Pine Valley area drains to swales and storm drains that flow to West Monument Creek and then to Monument Creek. Monument Creek and West Monument Creek are tributaries to Fountain Creek.

The Hunt activities are conducted independent of any review or coordination with the AFA's Environmental Office (in the Civil Engineer's Office). Drainage within the AFA is part the AFA's MS4. The storm drains within Douglass Valley and Pine Valley are all part of the AFA's MS4; the Environmental Office manages and reports on this MS4 to EPA.

NPDES Storm Water Inspection - Construction

SWPPP Review

SWPPP Implementation/Site Review:

Mr. Jackson will be leaving the site on 5/8/08. Mr. Gary Bain will assume project management of the site at that time as well as conduct the storm water inspections. Mr. Bain obtained storm water training from the contractor who prepared the SWPPP for the Algeska Hotel Housing Project.

The NOI and the Douglas Valley SWPPP appear to include only areas where new vertical construction will occur. The maps highlight where this new vertical construction will occur. There are areas in the Douglas Valley maps that are not highlighted where "renovations" are/will occur. "Renovation" means interior upgrading of the building and expansion of the existing buildings (which includes to a large degree with an extension of the building's foundation). Therefore, there were ground disturbance activities associated with these "renovation" efforts. The NOI, therefore, did not include the ground disturbance activities associated with the renovation efforts.

The SWPPP states that "if dirt or soil accumulates in local streets due to this project, the operator shall clean those areas by the end of the workday". Sediment loading on streets in Douglas Valley and on Blaubelle Dr./Dogwood Dr. and Pine Loop in Pine Valley were observed (see photos 12, 16, 17, and 29). The facility representative stated that sediment loading in Pine Valley occurred the previous day (although no work has occurred at this site since the project was "shut down" since 2/26/08 due to the asbestos issues). The sediment loading in Douglas Valley occurred the previous day (or days) based on the comments from the site representatives.

The port-o-lets were not anchored. Port-o-lets were observed in Douglas Valley and Pine Valley.

No concrete washout area has been designated. The site representatives indicated the location for a washout area will be noted on the map when a decision is made for its use.

The SWPPP called for sediment logs to be placed across open drainage ditches or around drain inlets. The inspectors observed the straw waddle on curbs where construction or renovation activities were occurring, and around sand piles. However, the sediment logs were not trenched in to prevent sediment from going beneath the logs. The straw wattles may not have been the appropriate BMP around sand piles deposited on the street (see photo 9) and where sand was observed beneath and outside the straw wattles. There was no BMPs around another sand pile that was upstream from a storm drain (see photos 4 and 5).

The maintenance of control section of the SWPPP (Part 5.2(2)) states that if site inspections identify BMPs that are not operating effectively, maintenance shall be performed by the operator as soon as possible and before the next storm event whenever possible to maintain continued effectiveness. The inspectors observed storm drains with torn rock socks (see photo 7 and 8). Since the inspection report did not record the condition of BMPs, and location of deficient BMPs it is difficult to determine how and when the facility is complying with permit and SWPPP.

At Pine Valley, demolition had ceased since Feb 26, 2008 due to asbestos abatement issues. The storm drains in the swales were not protected from the construction debris including asbestos contamination since the demolition started in late January 2008 or since work ceased in late Feb. This swale drains directly into the West Monument Creek drainage (see photos 18, 19, 20, 21, and 22). Note the construction debris and the ground disturbance uphill and adjacent to the storm drain in photo 18.

Note: The entire Douglas Valley and Pine Valley construction, demolition, and/or renovation areas were not inspected. Because of the lateness of the workday and the project size, the site representatives and inspectors went to various locations to observe the types of activities that were occurring and the types and condition of BMPs that were implemented. The inspectors observed the same conditions as they drove by other parts of the project. The photos are examples of what was observed; they represent the conditions occurring and the issues observed at Douglas Valley and Pine Valley.

Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 1
Photo Filename Picture 001.JPG
Photographer L.Fagen
Description Hunt Building
Company Sign at
4700 B E.
Ponderosa Dr.

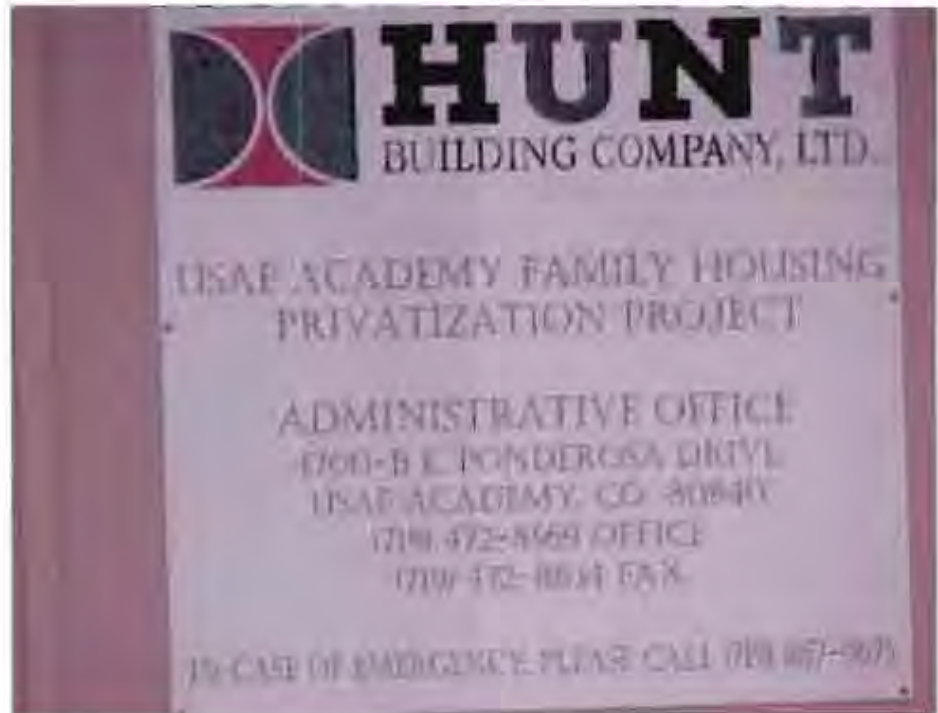


Photo Number 2
Photo Filename Picture 002.JPG
Photographer L.Fagen
Description Overview of Hunt
Building Company
Sign at 4700 B E.
Ponderosa Dr.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 3
Photo Filename Picture 003.JPG
Photographer LFagen
Description Example of BMP of stormdrain in Douglass Valley. Closeup of photo 4 looking east.



Photo Number 4
Photo Filename Picture 004.JPG
Photographer LFagen
Description Stormdrain and sand pile (upstream from storm drain) at the cul-de-sac east of 4202E W. Muledeer East, Lower Douglass Valley, looking west.



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Media: Stormwater-Construction

Photo Number 5
Photo Filename Picture 005.JPG
Photographer L.Fagen
Description Close up of sand pile in photo 4 and staging area, not described in SWPPP, at the cul-de-sac at 4202G W, Muledeer East, Lower Douglass Valley, looking southwest.



Photo Number 6
Photo Filename Picture 006.JPG
Photographer L.Fagen
Description Close up of supplies (cement-lime) under tarp in photo 4.



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Media: Stormwater-Construction

Photo Number 7

Photo Filename Picture 007.JPG

Photographer L.Fagen

Description Another example of storm drain inlet in Douglass Valley; located at southeast corner of W. Douglass Dr. and W. Muledeer East.



Photo Number 8

Photo Filename Picture 008.JPG

Photographer L.Fagen

Description Storm drain inlet at southwest corner of W. Douglass Dr. and W. Muledeer East. Downstream of sediment in road in photo 12.



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Media: Stormwater-Construction

Photo Number 9
Photo Filename Picture 009.JPG
Photographer L.Fagen
Description Sand pile with straw
rolls west of 4201A
W. Muledeer East.



Photo Number 10
Photo Filename Picture 010.JPG
Photographer L.Fagen
Description Drain north of 4201B
W. Muledeer East,
along W. Douglass
Dr.



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Media: Stormwater-Construction

Photo Number 11
Photo Filename Picture 011.JPG
Photographer L.Fagen
Description Drain north of 4201A
W. Muledeer East,
along W. Douglass
Dr.



Photo Number 12
Photo Filename Picture 012.JPG
Photographer L.Fagen
Description Waddles at 4201A
W. Muledeer East;
not trenched in.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 13
Photo Filename Picture 013.JPG
Photographer L.Fagen
Description Drainage looking west towards Douglass Loop; culvert inlet in the middle of the photo.



Photo Number 14
Photo Filename Picture 014.JPG
Photographer L.Fagen
Description Expanded view of drainage looking west towards Douglass Loop; culvert is lower than terrain in photo.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 15
Photo Filename Picture 015.JPG
Photographer L.Fagen
Description Close up view of photos 13 and 14 of stormwater culvert, looking west towards Douglass Loop.



Photo Number 16
Photo Filename Picture 016.JPG
Photographer L.Fagen
Description Rock sock with dirt on road at 4112 Douglass Loop.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 17
Photo Filename Picture 017.JPG
Photographer L.Fagen
Description Rock sock with dirt
on road at 4112
Douglass Loop.



Photo Number 18
Photo Filename Picture 018.JPG
Photographer L.Fagen
Description Pine Valley: Storm
drain inlets in swale
between houses
southeast of
Bluebelle Dr. and
Pine Loop looking
north; housing
demolition debris pile
in background.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 19
Photo Filename Picture 019.JPG
Photographer L.Fagen
Description Close up of photo 18; debris on inlet grate. No BMP above or below storm drain grate.



Photo Number 20
Photo Filename Picture 020.JPG
Photographer L.Fagen
Description Looking south at swale and drain inlet in photo 18.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 21
Photo Filename Picture 021.JPG
Photographer L.Fagen
Description Drainage swale between houses southeast of Bluebelle Dr. and Pine Loop, looking south.



Photo Number 22
Photo Filename Picture 022.JPG
Photographer L.Fagen
Description Close up of a drain in drainage swale south of the storm drain in photo 18.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 23
Photo Filename Picture 023.JPG
Photographer L.Fagen
Description Overview of Pine Valley site, southeast of Bluebelle Dr. and Pine Loop, looking south.



Photo Number 24
Photo Filename Picture 024.JPG
Photographer L.Fagen
Description Overview of Pine Valley site, southeast of Bluebelle Dr. and Pine Loop, looking southwest.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 25
Photo Filename Picture 025.JPG
Photographer L.Fagen
Description Overview of Pine Valley site, southeast of Bluebelle Dr. and Pine Loop, looking west.



Photo Number 26
Photo Filename Picture 026.JPG
Photographer L.Fagen
Description Overview of Pine Valley site, southeast of Bluebelle Dr. and Pine Loop, looking east.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 27
Photo Filename Picture 027.JPG
Photographer L.Fagen
Description Overview of Pine Valley site, southeast of Bluebelle Dr. and Pine Loop, looking northwest.



Photo Number 28
Photo Filename Picture 028.JPG
Photographer L.Fagen
Description Overview of Pine Valley site, southeast of Bluebelle Dr. and Pine Loop, looking southeast.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 29
Photo Filename Picture 029.JPG
Photographer L.Fagen
Description Intersection of Bluebelle Dr./Dogwood Dr. and Pine Loop looking south. Sediment loading in this area flow to storm drain in photo 37 and to West Monument Creek drainage, photo 39.



Photo Number 30
Photo Filename Picture 030.JPG
Photographer L.Fagen
Description Storm drain inlet at southwest corner of Bluebelle Dr. and Pine Loop.



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Media: Stormwater-Construction

Photo Number 31
Photo Filename Picture 031.JPG
Photographer L.Fagen
Description Close up of photo 30; dirt inside inlet.



Photo Number 32
Photo Filename Picture 032.JPG
Photographer L.Fagen
Description Storm drain inlet at northwest corner of Bluebelle Dr. and Pine Loop.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 33
Photo Filename Picture 033.JPG
Photographer LFagen
Description Close up of photo 32; dirt and straw inside inlet.



Photo Number 34
Photo Filename Picture 034.JPG
Photographer L.Fagen
Description Storm drain inlet at northeast corner of Bluebelle Dr. and Pine Loop.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 35
Photo Filename Picture 035.JPG
Photographer L.Fagen
Description Storm drain inlet at
south end of
Dogwood Dr.,
looking south.



Photo Number 36
Photo Filename Picture 036.JPG
Photographer L.Fagen
Description Close up of photo 35.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 37
Photo Filename Picture 037.JPG
Photographer L.Fagen
Description Drain and silt fence west of the drain in photo 35, west of the sidewalk along Dogwood Dr.



Photo Number 38
Photo Filename Picture 038.JPG
Photographer L.Fagen
Description Overview of drain at Dogwood Dr. (photo 35) and drainage to West Monument Creek.



Photographs for Privatized Housing - Douglass and Pine Valleys, Hunt Building Company

Media: Stormwater-Construction

Photo Number 39
Photo Filename Picture 039.JPG
Photographer L.Fagen
Description Drainage to West
Monument Creek.

