

**CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Purpose:

Compliance Evaluation Inspection (Clean Water Act portion of a Multi Media Inspection)

Facility:

Scott Air Force Base
501 Hangar Road, Building 531
Scott Air Force Base, Illinois, 62225
St. Clair County

NPDES Permit Numbers: ILR400611 – MS4; IL0026859 – WWTP; ILR002659 – Industrial;
ILG870710 – Pesticide; LR10ZAZG, ILR10ZBCG, LR10ZBGU,
ILR10ZCP1– Construction

Date of Inspection: September 16-18

EPA Representatives:

Benjamin Atkinson, Inspector – CWA Lead 312-353-8243
Atkinson.ben@epa.gov

Cher Benisek, Physical Scientist – Multi Media Lead 440-250-1710
Benisek.cher@epa.gov

State Representatives:

Brian Rodely, Title 618-201-1970
brian.rodely@illinois.gov

Facility Representatives:

Allison Newman, Installation Flight Chief 724-884-3754
Allison.newman@us.af.mil

Michelle Engel, CEIE Water Quality Program Manager 618-256-5300
Michelle.engel@us.af.mil

*Sign in sheets for all participants are included as Attachment C

Report Prepared by: Benjamin Atkinson, Inspector

Inspector Signature: BENJAMIN ATKINSON  Digitally signed by BENJAMIN ATKINSON
Date: 2025.02.14 13:08:32 -06'00'

Approver Name and Title: Ryan J. Bahr, Section 2 Supervisor, Water Enforcement and Compliance Assurance Branch

Approver Signature: Ryan Bahr  Digitally signed by Ryan Bahr
Date: 2025.02.14 13:28:06 -06'00'

1. BACKGROUND

On September 16-18, EPA conducted an NPDES Clean Water Act (CWA) compliance inspection as part of an EPA multi-media inspection at Scott Air Force Base in St. Clair County, Illinois. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

Scott Air Force Base (AFB) is located in St. Clair County, Illinois (IL) in the southwestern portion of the State, approximately 25 miles east of downtown St. Louis, Missouri. The Scott AFB Location Map is presented in Attachment A and the Scott AFB Site Map is presented in Attachment B. The Base is located within the IL portion of the St. Louis metropolitan area known as Metro East. The setting is semi-rural at the edge of the Metro East area. The Base is surrounded by smaller municipalities, including O'Fallon, Belleville, Lebanon, and Mascoutah. The Base is bordered on the east by Silver Creek. The Base occupies approximately 2,900 acres (1.26 x 10⁸ square feet). Approximately 25 percent of the Base is covered with impervious areas, such as pavement and buildings.

Currently, Scott AFB is the home of the 375th Air Mobility Wing (AMW). The 375th AMW is responsible for the operation, management, and maintenance of the mission of Scott AFB; managing an aeromedical evacuation system for the continental U.S.; and command and supervision of all active-duty C-21 aircraft within the U.S.

The 375th AMW is host to the following commands:

- The Air Mobility Command (AMC) and U.S. Transportation Command
- The 18th Air Force
- The 932nd Airlift Wing (AW) and 126th Air Refueling Wing (ARW)
- Surface Deployment Distribution Command
- The Defense Information Technology Contracting Organization

Scott AFB maintains an airport with an 8,000-foot runway, an air traffic control tower (built in 1997), and associated aircraft. The Base is also host to a number of tenant organizations. The 375th AMW operates C-21A and NC-21 aircraft from Scott AFB, Will Rogers World Airport, Joint Base Andrews, and Peterson AFB. The 932nd AW operates C-40 aircraft assigned to Scott AFB. The C-40 aircraft are flown and maintained by the 932nd AW and the 54th Airlift Squadron. The 126th ARW and the 906th Air Reserve Station operate KC-135R aircraft.

The Mid America Airport (MAA) is a joint-use venture between the AF and local governments. An additional runway was added to support commercial flights. Scott AFB extended their taxiway to connect with the airport and has access to the runway but is not responsible for the operation or maintenance of the airport.

Insert a paragraph on any prior violations by US EPA or the state, any compliance measures required of the facility, and the NPDES permit status. Include the facility's compliance in response to any prior violations.

2. NPDES Regulated Activities

Scott AFB currently has coverage under the following NPDES permits:

ILR400611 – General NPDES Permit for Discharges from Small Municipal Separate Storm Sewer Systems

IL0026859 – Individual NPDES Permit for Discharges from Sanitary Treatment Plant

ILR002659 – General NPDES Permit for Storm Water Discharges from Industrial Activities

ILG870710 – General NPDES Permit for Pesticide Application Point Source Discharges

ILR10 – General NPDES Permit for Storm Water Discharges From Construction Site

3. Inspection Activities

Day 1

Note: Photos from this portion of the inspection are found in Attachment D – Photo Log 1

EPA arrived at Scott AFB at approximately 8:00 AM on September 16, 2024. After being cleared through security, EPA was Captain Newman escorted to the meeting room designated for their use by. EPA presented their credentials and were given an introduction to Scott AFB. Following the introduction, the different programs (CWA, SPCC, etc) separated and began their specific inspection. Michelle Engel, Water Quality Program Manager, assisted Ben Atkinson. There were technical difficulties transferring the electronic documents prepared by Scott AFB and Ms. Engel was able to make some of those documents available to review on her computer.

Following a period of document review and lunch, EPA proceeded to the Scott AFB wastewater treatment plant. EPA spoke with Mr. Michael Welsh, the Class I operator of the WWTP. Mr. Welsh provided an overview of the plant operations and then led the inspectors on a tour of the plant.

The WWTP consists of a head works consisting of a bar screen and grit screen, primary clarifiers, two rock media filters, three final clarifiers, disk filters, UV disinfection, and anaerobic digesters for sludge. The WWTP has a design average flow 2.0 million gallons per day and a design maximum flow of 3.0 million gallons per day. The WWTP's permit lists five outfalls. They are: B01 – STP Outfall, A01 – Excess Flow Outfall, 001 – Combined Discharge from A01 and B01, 002 – Golf Course Pond, and 003 – Scott Lake. Mr. Welsh stated that 003 – Scott Lake was no longer used, and its exact location was not known. Water from the Golf Course Pond (outfall 002) is used for irrigation water at the on-base golf course. In the event of excess flow (flows in excess of 2,080 gallons per minute), the plant has a bypass of secondary treatment.

The facility walkthrough began in the laboratory where the facility does their own pH and Dissolved Oxygen analysis. EPA reviewed the lab's pH and Dissolved Oxygen calibration records (photos 1 and 2). During the inspection, EPA noted the on-site lab's pH buffer solution was expired. EPA then walked to the headworks building and observed the bar screen and grit screen (photos 3 - 5). EPA observed a storm water drain outside the headworks building in the area where the dumpsters used to collect the bar screen and grit screen tailings were stored (photo 6).

Mr. Welsh stated that he believed this storm water drain flowed back into the headworks. EPA then walked to and observed the primary clarifiers, digesters, final clarifiers, and disk filters (photos 7-18). At the time of the inspection, the disk filters were off-line. Mr. Welsh stated that there had been multiple unsuccessful projects and retrofits attempted to make the disk filters operational. He identified snail shells as the source of the problem. Solutions attempted included switching from a paper filter material to stainless steel and adding multiple filters to keep the snails out of the filter. He stated that the company that produced the filter now offered a retrofit specifically for snail shells; however, the cost was high enough that the facility was considering replacing the filters entirely with a more proven technology. EPA observed the large accumulation of snail shells in the filters (photos 19-23). EPA pointed out that if part of their treatment system was off-line, they may need to contact the Illinois EPA (the permitting authority) to notify them. Mr. Welsh stated that they had been in communication with the Illinois EPA throughout their efforts and that they had been successful in meeting their effluent limits despite the disk filters being off-line.

EPA then walked to the UV disinfection facility and then the outfall 001 (and B01) sampling location (photos 24-29). EPA observed the pump station that is used to pump effluent to outfall 002 – Golf Course Pond (photo 28). EPA also observed the auto sampler set up at the sampling location along with the sampler log book (photos 30 and 31).

EPA then walked to the excess flow facility and observed sampling point A01 where excess flow is sampled prior to being combined with flow from B01 and discharging (photos 34 and 35). EPA then walked back to the plant office. EPA requested one month of operating data to review and thanked the plant personnel for their time and assistance. Mr. Welsh stated that he would get the records together and make it available the following day.

EPA then returned to the conference room and continued records review for the remainder of the day.

Day 2

Note: Photos from day 2 are found in Attachment D – Photo Log 2

EPA returned to Scott AFB at approximately 8:00 AM on Tuesday September 17th. EPA conducted file reviews until approximately 8:30 AM at which point Mr. Reiner Busch led them on a tour of the storm water locations that are used for the Industrial Storm Water and MS4 observation and sampling locations. Mr. Busch stated that he conducts the observations and sampling and submits his data to a contractor who puts together the reports required for the Industrial Storm Water permit and the MS4 permit. The observation and/or sampling locations consist of three up-stream locations where waterways enter the base and 8 outfall locations as the waterways leave the portion of the AFB which have been identified as areas that may contribute pollutants. See Attachment E the Storm Water Sampling Location Map.

Mr. Busch took EPA first to “Outfall 2” also identified as “O-SD1” which is the downstream end of the waterway identified as “South Ditch” which flows along the south side of the base (photos 1-3). EPA observed the pipe which conveys flow to the golf course pond from the WWTP. This site is adjacent to the Salt Barn where deicing salt and chemicals are stored.

The inspectors then proceeded to “Outfall 3” also identified as “O-MC1” which is the confluence of the “South Ditch” and “Mosquito Creek” and then “Outfall 4” also identified as “O-MC2” which is after the confluence of “Mosquito Creek” and WWTP outfall. These sites are adjacent to the closed landfill on the base. EPA observed black pipes protruding out of the stream banks which may be associated with the closed landfill (photos 4-8).

The inspectors then proceeded to observation point “DA-9” and then to “Outfall 6” also identified as “O-CC1”. At “Outfall 6”, EPA observed that concrete appeared to have been poured down the stream bank to stabilize it (photos 9-12). EPA noted that it was important to go through the appropriate permitting process when altering a stream bank to avoid an unpermitted filling of a wetland.

The inspectors then proceeded to view “OUTFALL 7” (O-SL1), the Golf Course Pond, and then “INFLOW 1” (I-CC1). At “INFLOW 1”, EPA observed a leaking hose contributing runoff to “Cardinal Creek” (photos 13-21). Mr. Busch was unaware of what the hose was used for, if this was from the cart wash area, or if any cleaners were being utilized.

The Inspectors then proceeded to “INFLOW 2” (I-AC1), “INFLOW 3” (I-AC2), “OUTFALL 8” (O-PL1), “DA-4”, and “OUTFALL 1” (O-AC1) (photos 22-32). While walking between the base fence and the “South Ditch”, EPA observed eroded holes with pieces of broken pipe. These holes and pipe appeared to line up with the location of a storm water conveyance on the base’s storm water map (attachment B). EPA noted that this broken pipe could potentially restrict flow through the pipe causing upstream storm water backups and be contributing sediment through erosion of the stream bank (photos 33-36). EPA then observed a control structure that appeared to be able to allow the “South Ditch” to connect to Ash Creek if the gate were open and the water level were high enough (photos 37-44). The Inspectors then walked the remainder of the “South Ditch” to where it entered a pipe and was conveyed underground (photos 44-52).

EPA then returned to the conference room and continued file review for the remainder of the day.

Day 3

Note: Photos from day 3 are found in Attachment D – Photo Log 3

EPA returned to Scott AFB at approximately 8:00 AM on Wednesday September 19th. EPA conducted file reviews until approximately 8:45AM at which point Ms. Michelle Engel escorted EPA to the Building 1600 construction site, one of the active sites covered by a construction general permit. In the site office, EPA met with representatives from Korte - River City Joint Venture (KRCJV) and the United States Army Corp of Engineers. This included Mr. Mitchel Widman, the site superintendent. Mr. Widman provided the Storm Water Pollution Prevention Plan for the site for review. EPA documented the site plan and weekly site inspections (photos 1-7).

EPA then began a walkaround of the construction site. Beginning on the west side of the site, EPA observed BMPs in place including storm drain inlet protection (photo 9) and silt fence

(photos 10 -12). EPA observed that some silt fence on the northwest side of the site needed maintenance. EPA walked around the north side of the site and observed silt fence along the north edge of the site (photo 13).

EPA walked to the east side of the site and observed water running off the site to a storm drain on Scott Drive (photos 14-16). EPA observed that the water was coming from a hose originating inside the building (photos 17 and 18). After inquiring, Mr. Widman informed EPA that the hose was coming from dewatering an elevator shaft and stated that the site personnel had been instructed that any future dewatering should be discharged to an area where the water could infiltrate on site.

EPA walked around the southeast corner of the site and observed a storm water drain and curb drain that were not called out on the site plan. Both drains were observed to have sediment protection installed around them (photos 19 and 20). EPA continued to walk west along the south side of the site to the west side. EPA observed a plastic lined dumpster that appeared to be the site's concrete washout (photo 21). EPA also observed a storm drain inlet adjacent to the concrete washout that was not called out on the site plan. The drain was observed to have a silt fence around it; however, EPA observed white deposits on the storm drain (photo 22).

EPA walked north on the west side of the site and observed that a portion of the silt fence had been pushed down by a dirt pile (photo 23). EPA also observed what appeared to be a hose from a foundation drain that went to a storm water manhole (photos 24 and 25). EPA returned to the trailer and observed that drain protection had been provided to the parking lot area (photo 26). In the office, Mr. Widman showed an example of the spill kits available on-site (photo 27).

Following the inspection of the construction site, EPA went and spoke with Mr. Kevin McCay regarding plane deicing at Scott AFB. Mr. McCay explained the process for deicing and showed EPA where the plane deicer was stored and where it was applied. The tanks the deicer is stored in are double walled tanks in an area where storm drains are collected by a oil/water separator. The area where deicer is applied is surrounded by a collection trough to collect any excess deicer. Due to the location being on the flight line, EPA did not take any photographs of the area. At the time of the inspection, EPA did not observe any spills or leaks.

EPA next went to the Salt Barn and observed the stockpile of road salt and deicing products used by Scott AFB on streets and sidewalks (photos 28 and 29). EPA observed that the road salt and deicing products were stored under roof in a building. EPA also observed several 250-gallon tanks of beet juice salt additive stored outside the building (photos 30 and 31).

EPA next spoke with the pesticide personnel. It was explained to EPA that the golf course does their own pesticide applications and sends the records of usage for record keeping and reporting purposes. All other pesticide use on the base is documented and recorded. EPA was shown the electronic records kept by Scott AFB. EPA then traveled to the pesticide storage and mixing building. EPA observed that the pesticide mixing area was under-roof, surrounded by a concrete berm, and sloped to a collection pit at the south end (photo 32). EPA observed spill kits within the pesticide storage buildings (photo 33). EPA also observed inventories of pesticides being stored (photo 34). EPA observed a black hose protruding over the top of the containment berm of

the mixing area (photo 35). EPA observed the other end of the hose was routed into the reception pit. The on-site personnel stated that when the pit filled up with water from the sink, they would pump it out to the ground. EPA also observed that sandbags had been placed in front of the storm drain adjacent to the pesticide storage buildings (photo 37).

4. Document Review

Prior to the inspection, EPA requested the following documents:

1. Current NPDES or Storm Water permit(s) and application(s).
2. Storm water management plan(s) and any other reports plans required by permit(s).
3. Current pretreatment ordinance(s)/permit(s)/administrative order(s) for wastewater discharges to the local POTW.
4. Any compliance order, schedule, or other enforcement actions issued in the last three years and related correspondence.
5. Any correspondence regarding exceedances of discharge limitations during the last three years.
6. Copies of self-monitoring report for NPDES discharges and discharges to any POTW (last 3 years).
7. BMR/90-day report for categorical Pretreatment Standards.
8. Periodic reports on continued compliance with categorical Pretreatment Standards for the last three years (40 CFR 403.12(e)).
9. Notifications of changed discharge and hazardous waste discharge to local POTW.
10. Slug discharge control plan(s).
11. Storm water pollution prevention plan(s) (SWPPP).
12. Facility water balance diagram.
13. List of water additives and wastewater treatment chemicals.

Scott AFB provided a link to be able to download their response; however, due to technical problems, EPA was unable to access the files this way. Cher Benisek worked with Scott AFB personnel to be able get access to the files provided. Additionally, as the inspection proceeded, Michelle Engel provided additional documents. Below is the list of documents EPA received electronically for review:

3.00 READ ME FIRST3.00 READ ME FIRST.docx
3.01 NPDES or SW Permits and ApplicationsNPDES Industrial Storm Water Permit 2023-2028.pdf
3.01 NPDES or SW Permits and ApplicationsPermit Applications2023-10-13 SAFB-Silver-Creek-Log-Jams_Joint-Permit-App.pdf
3.01 NPDES or SW Permits and ApplicationsPermit ApplicationsPRESIGNATURE SAFB-Replace-Landfill-Culvert_Joint-Permit-App.pdf
3.01 NPDES or SW Permits and ApplicationsPermit ApplicationsSAFB-Replace-Landfill-Culvert_Joint-Permit-App SIGNED.pdf
3.01 NPDES or SW Permits and ApplicationsPermit ApplicationsWWTP Permit RenewalsDRAFTS for review2025 form_2S.pdf

3.01 NPDES or SW Permits and Applications Permit Applications WWTP Permit Renewals DRAFTS for review DRAFT 2025 form_2a.pdf
3.01 NPDES or SW Permits and Applications Permit Applications WWTP Permit Renewals DRAFTS for review Site Map 2 Sludge 2023.jpg.
3.01 NPDES or SW Permits and Applications Permit Applications WWTP Permit Renewals DRAFTS for review Site Map 3 Sludge 2023.jpg
3.01 NPDES or SW Permits and Applications Permit Applications WWTP Permit Renewals DRAFTS for review Site Map 4 Sludge 2023.jpg.
3.01 NPDES or SW Permits and Applications Permit Applications WWTP Permit Renewals DRAFTS for review Thumbs.db
3.01 NPDES or SW Permits and Applications Permit Applications WWTP Permit Renewals DRAFTS for review Topographic Map WWTP.pdf
3.01 NPDES or SW Permits and Applications Permit Applications WWTP Permit Renewals DRAFTS for review Wastewaterflow.pdf.
3.01 NPDES or SW Permits and Applications Permit--Active--NPDES Industrial Storm Water Permit 2023-2028.pdf.
3.01 NPDES or SW Permits and Applications Renewal--NPDES Industrial Storm Water Permit 2023-2028.pdf
301NPD-1.JPG
3.02 SW Management Plans and Reports SWMP Update March 2024 Outfall DA-11 O-9 Drain Functioning Properly.mp4
3.02 SW Management Plans and Reports SWMP Update March 2024 Plan--Annual Review--Storm Water Management Plan--20240415.pdf
3.02 SW Management Plans and Reports SWPPP Update March 2024 Attachment A B.pdf
3.02 SW Management Plans and Reports SWPPP Update March 2024 Attachment C.pdf
3.02 SW Management Plans and Reports SWPPP Update March 2024 Attachment D.docx
3.02 SW Management Plans and Reports SWPPP Update March 2024 Attachment D.pdf
CURRENT 2020-2025 Land Application of Sewage Sludge Permit 2020-SC-65005.pdf
CURRENT 2023-2028 Construction General Permit for Stormwater Discharges ILR10.pdf
CURRENT 2023-2028 SAFB Industrial Permit ILR002659.pdf
Permit--NOI for Modification--Pretreatment of Aqueous IDW--Submitted April 2024.pdf.
CURRENT 2016-2021 SAFB Small Municipal Separate Storm Sewer (MS4) Permit ILR400611.pdf
CURRENT 2020-2025 SAFB Wastewater FOTW Permit IL0026859 (09July21).pdf
CURRENT 2022-2027 SAFB Pesticide Application Permit ILG870710.pdf
CURRENT 2023-2028 Pretreatment of Aqueous IDW - Updated 10Jun2024 - 2023-EA-67823.pdf
2016-2021 SAFB Pesticide Application Permit ILG870710.pdf
2208176 Building 1600 Renovation, AMC Headquarters.pdf
B1600 Submittal No. 01 57 19.00 06-1 SWPPP.pdf
B4001 Parking Lot CGP ZBCG.pdf
Building 1600.pdf
Construction Projects Permit Tracking.docx
EcoCAT_2207757_BLDG 4001.pdf
EcoCAT_2208176.pdf
IEPA JOMPC Permit Authorization.pdf

NOI_BLDG 4001.pdf
SAFB Building 1600.docx.
SWPPP_BLDG 4001 pt1.pdf
SWPPP_BLDG 4001 pt2.pdf

Additionally, the following documents were provided in hard copy for review:
“Stormwater Sampling Location Map-SAFB”
“Quarterly Stormwater Sample Sheet”
“MAY 2022 DMR INFO”.

EPA also reviewed the May 2022 DMR submitted to the E-DMR site.

5. Findings and Areas of Concern

The findings and Areas of Concern are listed below for each program inspected.

Note: Given the technical difficulties transferring files between Scott AFB system and EPA’s system, it is possible that some files that were intended to be transmitted were unsuccessful.

5.1 WWTP – NPDES Permit No. IL0026859

1. The buffer solution used for calibration of the pH monitor was expired.
Note: Following the inspection, Mr. Welsh notified EPA that they had ordered new buffer solution and provided a purchase order.

2. When referring to the excess flow facilities, Permit no. IL0026859 states that the facilities:

“not be utilized until the main treatment facility is receiving its design maximum flow (DMF)* (flow in excess of 2080 gpm).” “*An explanation shall be provided in comments section of the DMR should these facilities be used when the main treatment facility is not receiving Design Maximum Flow (DMF). The explanation shall identify the reasons the main facility is at a diminished treatment capacity. Additionally, the Permittee shall comply with the provisions of Special Condition 7. The Duration of each A01 discharge and rainfall event (i.e., start and ending time) including rainfall intensity shall be provided in the comment section of the DMR... The Main treatment facility flows at the time that AO1 Excess Flow Facilities are first utilized shall be reported in the comment section of the DMR in gallons per minute (gpm).”

EPA reviewed the DMR for May 2022. The excess flow facilities were utilized twice (May 5 and May 21). The comment section of the DMR states “We had a total of 15 rain events in the month with a total of 4.46 inches of rain. max for 1 event was 1.42 inches.”

The information provided in the comment section does not include the duration of discharge, the duration of the associated rainfall event, the rainfall intensity, or the main treatment facility flows at the time that the excess flow facilities were first utilized.

3. As part of the Inspection, EPA requested that Scott AFB provide “any other reports plans required by permit(s).”

Permit no. IL0026859 in special condition 15 requires that:

“The Permittee shall, within 18 months of the effective date of this permit, prepare and submit to the Agency a feasibility study that identifies the method, timeframe, and costs of reducing phosphorus levels in its discharge to a level consistently meeting a potential future effluent limit of 1.0 mg/L, 0.5 mg/L and 0.1 mg/L.”

No such study was received by EPA for review.

4. As part of the Inspection, EPA requested that Scott AFB provide “any other reports plans required by permit(s).”

Permit no. IL0026859 in special condition 16 requires that:

“The Permittee shall develop and submit to the Agency a Phosphorus Discharge Optimization Plan within 18 months of the effective date of this permit.”

No such plan was received by EPA for review.

5.2 Storm Water Discharges from Industrial Activities – NPDES Permit No. ILR002659

1. NPDES Permit No. ILR002659 section G. 1. states that “The Permittee shall conduct facility inspections covering all the areas subject to the requirements of this permit and identified in the SWPPP within 72 hours of the beginning of a storm event.

Inspections must be conducted at least quarterly or in some instances more frequently as appropriate.”

The April 2024 “Annual NPDES Industrial Permit Report” identifies the facility inspection as an “annual industrial facilities activities inspection” and shows that the inspection was not conducted quarterly.

2. NPDES Permit No. ILR002659 Attachment 1 S.6 requires that the permittee “conduct facility inspections at least monthly during the deicing season (e.g., October through April for most mid-latitude airports). If your facility needs to deice before or after this period, expand the monthly inspections to include all months during which deicing chemicals may be used.”

The April 2024 “Annual NPDES Industrial Permit Report” does not report that facility inspections were conducted at least monthly during the deicing season.

3. The SWPPP states that “Under the General NPDES Permit for Storm Water Discharges from Industrial Activities (ILR00), Scott AFB falls under the following sectors: Sector S Air Transportation , Sector N Scrap Recycling Facilities (Sub-Sector N2 Source seperated Recycling Facilities), and Sector P Land Transportation and Warehousing” but does not include Sector T – Treatment Works.
4. NPDES Permit No. ILR002659 section J. 2. c. states that “The Permittee must monitor for any benchmark parameters specified for the industrial sector(s), both primary industrial activity and any co-located industrial activities, applicable to the discharge. Industry-specific benchmark concentrations are listed in the sector-specific sections of Attachment 1.” Attachment 1 to the permit identifies PAH, COD, TSS, and pH as Report Only Indicator Monitoring Parameters.

NPDES Permit No. ILR002659 section J. 2. e. states “Benchmark monitoring must be conducted quarterly for first four full quarters of permit coverage commencing no later than 180 days after the effective date of this permit.” The effective date of the permit is July 1, 2023. Benchmark monitoring was required Quarters 3 and 4 of 2023 and Quarter 1 and 2 of 2024

The “ANNUAL NPDES INDUSTRIAL PERMIT REPORT” dated April 2024 included sampling results from an October 31, 2023 sampling event. The sampling event did not include PAH as an analyte.

Scott AFB failed to conduct the benchmark monitoring with the frequency and analytes required by the permit.

5. NPDES Permit No. ILR002659 section E. 5. B. requires that the site map include, among other things:
 - a. Service Areas”
 - b. Material loading, unloading, transfer, and access areas
 - c. Direction of storm water flow (use arrows)
 - d. Fueling stations

The site map included in the SWPPP does not include these items.

5.3 Small Municipal Separate Storm Sewer Permit ILR400611

1. Permit ILR400611 in Part IV. B. 1.a.i. specifies that “Information on effective pollution prevention measures to minimize the discharge of pollutants from private property and activities into the storm sewer system, on the following topics:
 - E. Winter de-icing material storage and use.”

No information on winter de-icing material storage and use was observed in the educational material distributed to the community as shown in the Annual Report.

2. Permit ILR400611 in Part V.C.1. states that the Annual Report must include “An assessment of the appropriateness and effectiveness of the permittee’s identified BMP’s and progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable, and the permittee’s identified measurable goals for each of the minimum control measures.

No assessment of appropriateness or effectiveness was included in the 2023-2024 Annual Report

5.4 Pesticide Application Point Source Discharges General Permit ILG870710

1. During the Inspection, EPA observed a hose originating the collection pit of the pesticide mixing area that outletted outside the containment berm around the pesticide mixing area. Discharge from this hose has the potential to contribute pollutants to runoff from the pesticide mixing area to a Water of the United States.

Following the Inspection, EPA was notified that the hose had been removed and the appropriate personnel notified that the collection pit water was not to be discharged.

5.5 General NPDES Permit for Storm Water Discharges From Construction Site Activities General Permit ILR10

1. The permit, in section IV D. requires “A site map indicating drainage patterns and approximate slopes anticipated before and after major grading activities, locations where vehicles enter or exit the site and controls to prevent offsite sediment tracking, areas of soil disturbance, the location of major structural and nonstructural controls identified in the plan. the location of areas where stabilization practices are expected to occur. locations of onsite or off-site soil stockpiling or material storage, surface waters (including wetlands), and locations where storm water is discharged to a surface water or MS4. For sites discharging to an MS4, a separate map identifying the location of the construction site and the location where the MS4 discharges to surface water must also be included.”

The maps included in the submitted SWPPP did not include the following:

- a. Locations of onsite or offsite soil stockpiling
- b. Locations where storm water is discharged to a surface water or MS4
- c. A separate map identifying the location of the construction site and location where the MS4 discharges to surface water

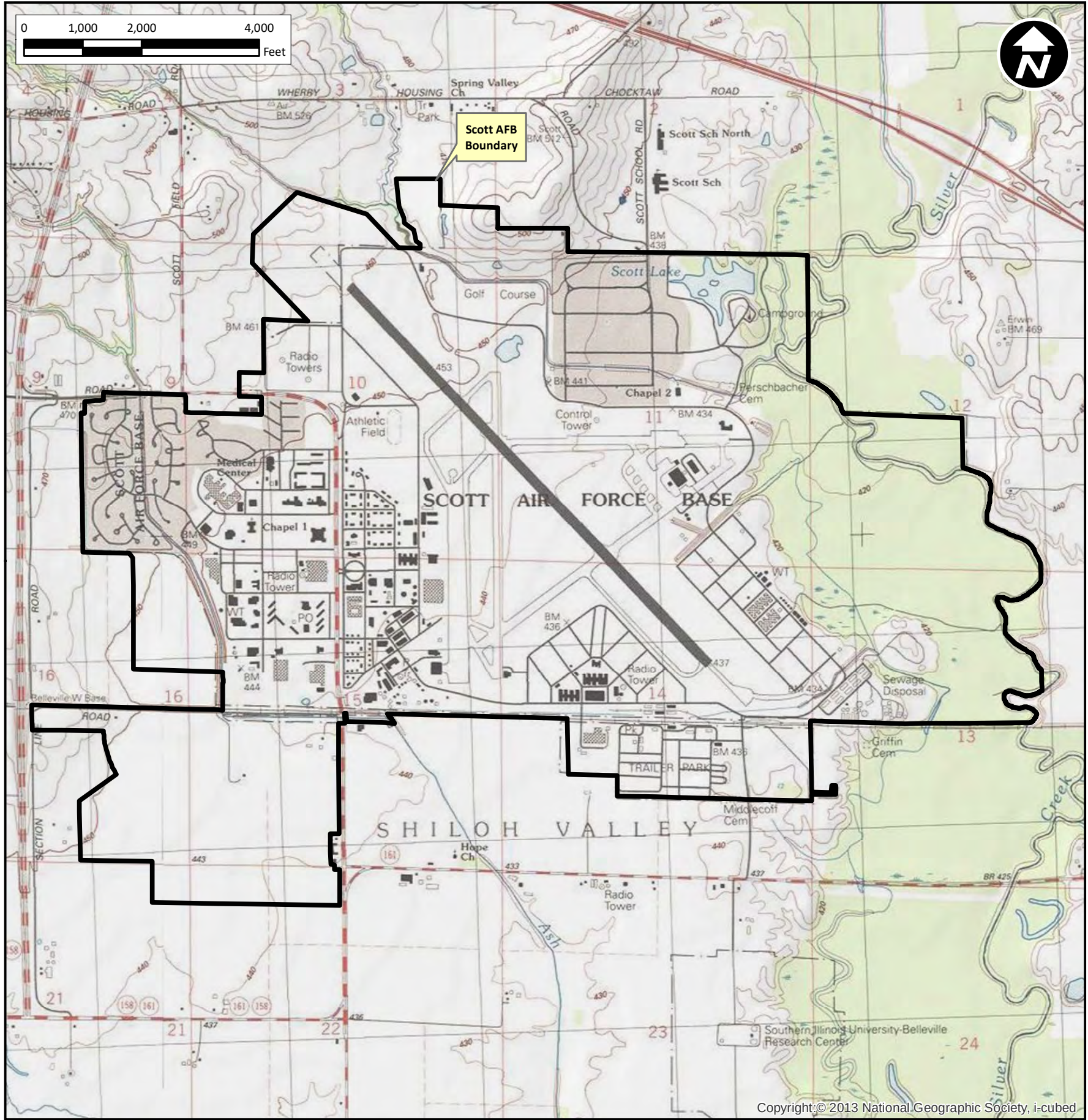
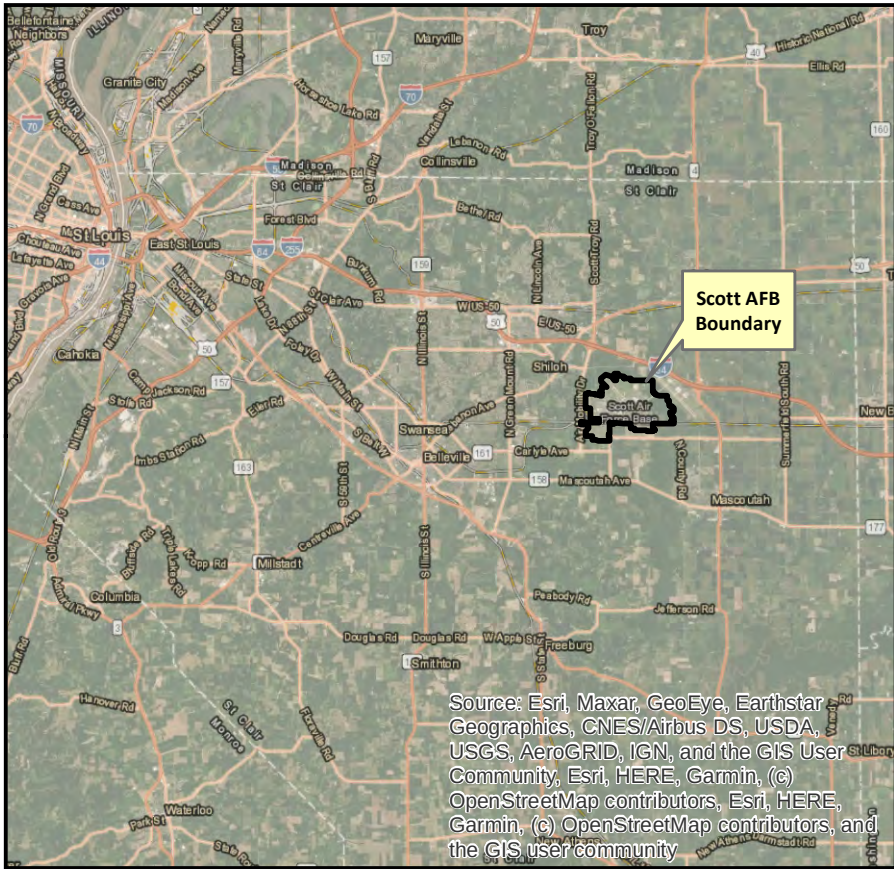
2. EPA noted the following inconsistencies between the SWPPP and practices on-site:
 - a. Silt fence was not installed as indicated on sheet C-501.
 - b. The concrete washout was not constructed as indicated on sheet C-502 including not meeting set-back distance from storm water drains.
3. As shown in photos 11, 12, and 23 of photo log 2, EPA observed several locations where the silt fence was in need of repair.
4. NPDES Permit No. ILR002659 Part III. A. 3. states “The following non-storm water discharges are prohibited by this permit: concrete and wastewater from washout of concrete (unless managed by an appropriate control)”. As shown in Photo 22 of Photo Log 2, it appears that wastewater from the concrete washout had reached a storm drain.
5. NPDES Permit No. ILR002659 Part III. A. 2. b. states “The following non-storm water discharges may be authorized by this permit provided the non-storm water component of the discharges is in compliance with Part IV.D.5 (Non-Storm Water Discharges): ... and foundation or footing drains where flows are not contaminated with process materials such as solvents.” Permit ILR002659 Part IV.D. states “Except for flows from firefighting activities, sources of non-storm water listed in Part II 1.A.2 of this permit that are combined with storm water discharges associated with industrial activity must be identified in the plan. The plan shall identify and ensure the implementation of appropriate pollution prevention measures for the non-storm water component(s) of the discharge.”

EPA observed a discharge from a red hose to a storm drain (photos 14-18 of Photolog 2) which SAFB personnel identified as dewatering from an elevator shaft. The SWPPP did not identify appropriate pollution prevention measures for this non-storm water discharge.

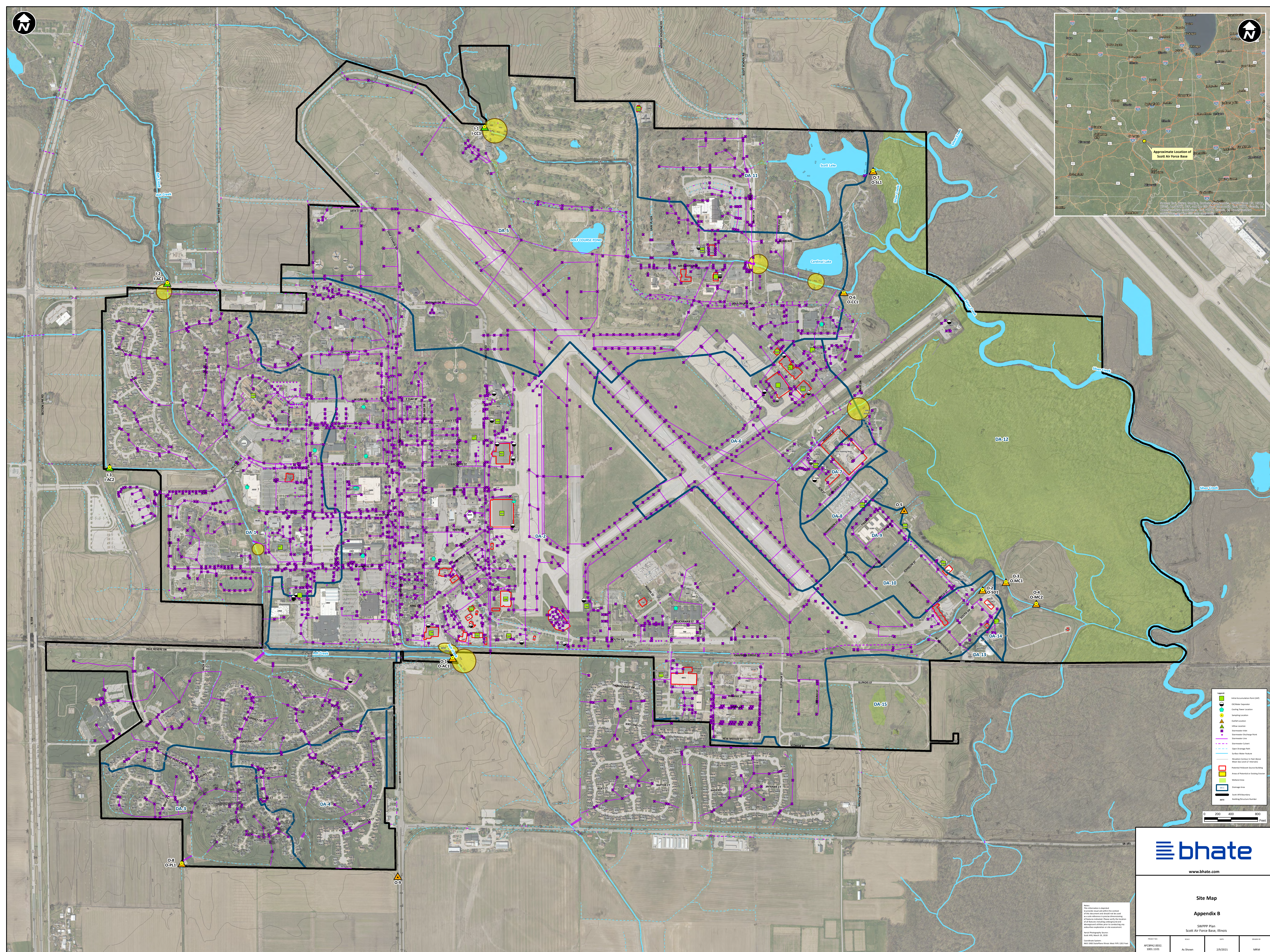
6. LIST OF ATTACHMENTS

- A) Scott Air Force Base Location Map
- B) Scott Air Force Base Site Map
- C) Sign-in Sheets for Inspection Activities
- D) Photo Logs

Attachment A - Location Map



Attachment B - Site Map



Attachment C - Sign In Sheets

MULTIMEDIA INSPECTION SIGN IN SHEET

Project:	Scott AFB Multimedia Inspection	Inspection Dates:	9/16 - 9/19/2024
Lead Inspector:	Cher Benisek	Facility Address:	

Name	Title	Phone	E-Mail
Cher Benisek	Project Lead Physical Scientist	440-250-1710	benisek.cher@epa.gov
Ben Atkinson	Inspector	312 353 8243	atkinson.ben@epa.gov
Andrea Dierich	Inspector (RCRA)	312.353.6134	Dierich.andrea@epa.gov
Anne Marie Vincent	Inspector (SPCC) Life Scientist	440-250-1720	vincent.annemarie@epa.gov
Brian Rodely	Illinois EPA Inspector	6189937458	brian.rodely@illinois.gov
ADAM VRABEC	FEDERAL OSC	312-448-3853	VRABEC.ADAM@EPA.GOV
Allison Newman	Installation Flight Chief	724-884-3754	allison.newman@us.af.mil
PAUL SCHMIDT	DEPUTY BASE CIVIL ENG.	(618) 404-6061 (text) (418) 256-2701	Paul.Schmidt.11@us.af.mil
Kevin Emerson	CAS Manager	618 256-2184	Kevin.emerson.ctr@us.af.mil
Charles Holada	Physical Scientist	312-886-4883	holada.Charles@epa.gov
Jeff Webster	ESPI	618-346-5154	jeffery.Webster@Illinois.gov
Alexandra Gibbs	Inspector [EPCRA 313]	919-345-9396	alexandra.gibbs@erg.com
Cheryl Keenan	Inspector EPCRA 313	781-724-4407	Cheryl.Keenan@erg.com
KAYLA SEIFFERT	SCOTT AFB EPCRA MANAGER	(418) 256-2046	KAYLA.SEIFFERT@US.AF.MIL

(HAZMAT / HAZ WASTE PM)

§
MILITARY

MULTIMEDIA INSPECTION SIGN IN SHEET

Project:	Soth AirForce Base Multimedia	Inspection Dates:	9/16 - 9/19/2024
Lead Inspector:	Cher Benusek	Facility Address:	

Name	Title	Phone	E-Mail
DeMarco Harris	Env. Element Chief	618-509-3059	demarco.harris@us.af.mil
Tim McFall	Installation Emergency Mgr	314-746-7865 618-256-5291	Timothy.McFall@us.af.mil tim.mcfall
Doug Mifflin	WFSM Foreman	618 256-4183	douglas.mifflin@us.af.mil
Judd Newcomb	Fire Dept Training Chief	618-267-5130	judd.newcomb1@us.af.mil
Jerod Trainer	Asst Chief Operations	618 256 5130	jerod.trainer@us.af.mil
chad Humann	WFSM NCOIC	618-256-1686	chad.humann@us.af.mil
Laura Schroeder	ATCEC Media Manager	630-484-4621	laura.schroeder.1@us.af.mil
LEAH ZEDELLA	EPA Inspector	440-250-1713	zedella.leah@epa.gov
Regan Taylor	IEPA Inspector	618 346-5129	regan.taylor@illinois.gov
Brooke Strong	Env. Compliance Lead	618-225-7673	brooke.strong@amwater.com
A. J. Olson	Director of Operations	254-258-5324	aj.olson@amwater.com
Doug Mifflin	WFSM Foreman	618 256-4183	douglas.mifflin@us.af.mil
Mark Liu	Bioenvironmental Engineer	618 256-7307	mark.s.liu.mil@health.mil
Sgt Scribner, Jonathan	Bioenvironmental	618 256 7307	jonathan.a.scribner.mil@health.mil
TSgt Monroy, Ivan	Bioenvironmental Eng.	618 256 7307	ivan.monroy2.mil@health.mil
Aaron Williams	Manager Amwater	618 580 6422	aaron.williams@amwater

[illegible]

CWA
water
log

* Personnel in the Chain of Command are not required to log in. (i.e. Superintendent, Ops Chief, Commander, etc.)
 ** WWTP personnel should not allow unescorted personnel in the plant compound.

** WWTP personnel should not allow unescorted personnel in the plant compound.

Attachment D - Photo Log 1

[illegible]

Date/Time: 09/16/2024 1:24 PM

DATE	INT	SLOP	REMARKS
2 SEP 24	TRUL	95.8	OK
1	TRUL	95.6	OK
5	TRUL	95.6	OK
6	TRUL	95.4	OK
7	CE	95.7	OK
8	CE	95.5	OK
9	CE	95.6	OK
10	CE	95.7	OK
11	CE	95.9	OK
12	CE	95.9	OK
13	TRUL	95.6	OK
14	CT	95.9	OK
15	CT	95.6	OK
16	CT	95.7	OK

2: RIMG0002

Description: Dissolved Oxygen meter calibration records.

Location: Laboratory in office of the waste water treatment plant.

Camera Direction: NA

Date/Time: 09/16/2024 1:25 PM



3: RIMG0003

Description: Looking down at the bar screen at the headworks of the plant.

Location: Headworks of the plant.

Camera Direction: Down

Date/Time: 09/16/2024 1:43 PM



4: RIMG0004

Description: Solids collection from grit screen at head works.

Location: Headworks of plant.

Camera Direction: Southeast

Date/Time: 09/16/2024 1:46 PM



5: RIMG0005

Description: Bar screen hopper at headworks to plant.

Location: Headworks to plant.

Camera Direction: Northeast

Date/Time: 09/16/2024 1:47 PM



6: RIMG0006

Description: Stormdrain outside door to headworks building. SAFB personel stated that this stormwater drain flowed into the headworks.

Location: Northeast of headworks.

Camera Direction: Down

Date/Time: 09/16/2024 1:48 PM



7: RIMG0007

Description: Pumps at headworks. Effluent is pumped to primary clarifier and then gravity flows through the rest of the plant.

Location: Northeast side of the headworks building.

Camera Direction: Down Date/Time: 09/16/2024 1:53 PM



8: RIMG0008

Description: Blower room for primary clarifiers.

Location: Blower room.

Camera Direction: Northeast

Date/Time: 09/16/2024 1:54 PM



9: RIMG0009

Description: Looking southwest along primary clarifiers.

Location: Northeast side of primary clarifiers.

Camera Direction: Southwest

Date/Time: 09/16/2024 1:58 PM

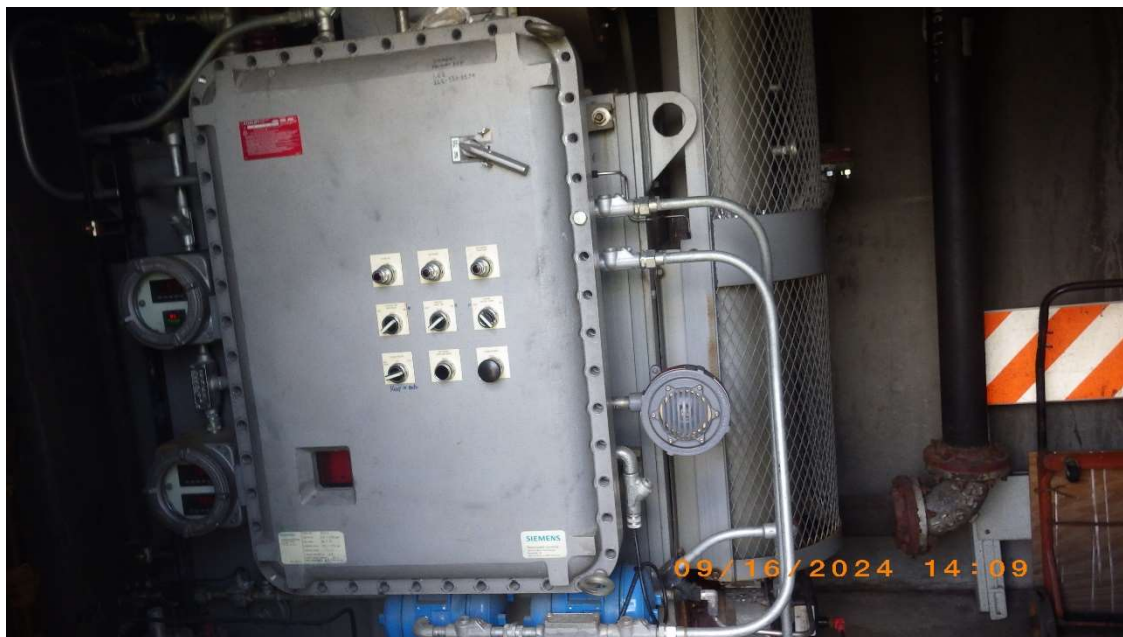


10: RIMG0010

Description: Excess flow facilities (outfall A01).

Location: Southeast of primary clarifier.

Camera Direction: Southeast Date/Time: 09/16/2024 1:58 PM



11: RIMG0011

Description: Controls for the anaerobic digesters in the digester building.

Location: Digester building.

Camera Direction: West Date/Time: 09/16/2024 2:09 PM



12: RIMG0012

Description: Sludge sampling location in the digester building.

Location: The digester building.

Camera Direction: Down Date/Time: 09/16/2024 2:11 PM



13: RIMG0013

Description: Final clarifiers. SAFB personel stated that algae was cleaned from the final clarifiers every Thursday.

Location: Final clarifiers.

Camera Direction: South Date/Time: 09/16/2024 2:14 PM



14: RIMG0014

Description: Final clarifier not in service. This clarifier was down for maintenance. Trickling filter in background to the left.

Location: Final clarifiers.

Camera Direction: Southeast Date/Time: 09/16/2024 2:14 PM



15: RIMG0015

Description: Final clarifier not in service. This clarifier was down for maintenance.

Location: Final clarifiers.

Camera Direction: Southeast Date/Time: 09/16/2024 2:15 PM



16: RIMG0016

Description: Final clarifiers. Digester in background to the right.

Location: Final clarifiers.

Camera Direction: West

Date/Time: 09/16/2024 2:16 PM



17: RIMG0017

Description: Interior of trickling rock filter.

Location: Interior of trickling filter.

Camera Direction: Southeast

Date/Time: 09/16/2024 2:17 PM



18: RIMG0018

Description: Historic sampling location. No longer in use.

Location: Southeast of disk filter building.

Camera Direction: Northeast Date/Time: 09/16/2024 2:21 PM



19: RIMG0019

Description: Non-operational disk filter. SAFB personel stated that the disk filters were non-operational due to snail shells in the effluent that immediately clogged the filter spray nozzles. SAFB personel stated that multiple solutions had unsuccessfully been attempted to return the disk filters to service and that the plant was considering alternative replacements.

Location: Disk filter building.

Camera Direction: Down. Date/Time: 09/16/2024 2:25 PM



20: RIMG0020

Description: Snail shells in the disk filter.

Location: Disk filter building.

Camera Direction: Down Date/Time: 09/16/2024 2:25 PM



21: RIMG0021

Description: Non-operational disk filter. SAFB personnel stated that the disk filters were non-operational due to snail shells in the effluent that immediately clogged the filter spray nozzles. SAFB personnel stated that multiple solutions had unsuccessfully been attempted to return the disk filters to service and that the plant was considering alternative replacements.

Location: Disk filter building.

Camera Direction: Down. Date/Time: 09/16/2024 2:26 PM



22: RIMG0022

Description: Non-operational disk filter. SAFB personel stated that the disk filters were non-operational due to snail shells in the effluent that immediately clogged the filter spray nozzles. SAFB personel stated that multiple solutions had unsucessfully been attempted to return the disk filters to service and that the plant was considering alternative replacements.

Location: Disk filter building.

Camera Direction: Down. Date/Time: 09/16/2024 2:27 PM



23: RIMG0023

Description: Outfall when disk filters were in service.

Location: Disk filter building.

Camera Direction: Down Date/Time: 09/16/2024 2:33 PM



24: RIMG0024

Description: UV disinfection reception pit.

Location: UV disinfection facility.

Camera Direction: Down Date/Time: 09/16/2024 2:36 PM



25: RIMG0025

Description: UV disinfection facility. SAFB personel stated that the facility consisted of 2 banks with 8 panels and 8 bulbs per panel outfitted with automatic bulb cleaners.

Location: UV disinfection facility.

Camera Direction: Northeast Date/Time: 09/16/2024 2:36 PM



26: RIMG0026

Description: Outfall 001 and B01. Sampling location for treated effluent (outfall B01) and combined discharge from A01 (excess flow outfall) and B01.

Location: Northeast corner of plant.

Camera Direction: Down Date/Time: 09/16/2024 2:38 PM



27: RIMG0027

Description: Outfall 001, B01, and 002. Sampling location for B01(STP outfall), combined discharge from A01 (excess flow outfall) and B01, and outfall 002 (Golf Course Pond). SAFB personel stated that outfall 003 (Scott Lake) was no longer in use.

Location: Northeast corner of plant.

Camera Direction: Down Date/Time: 09/16/2024 2:39 PM



28: RIMG0028

Description: Pump station for when effluent is pumped to outfall 002 Golf Course Pond.

Location: North of sampling location for outfall B01.

Camera Direction: North Date/Time: 09/16/2024 2:39 PM

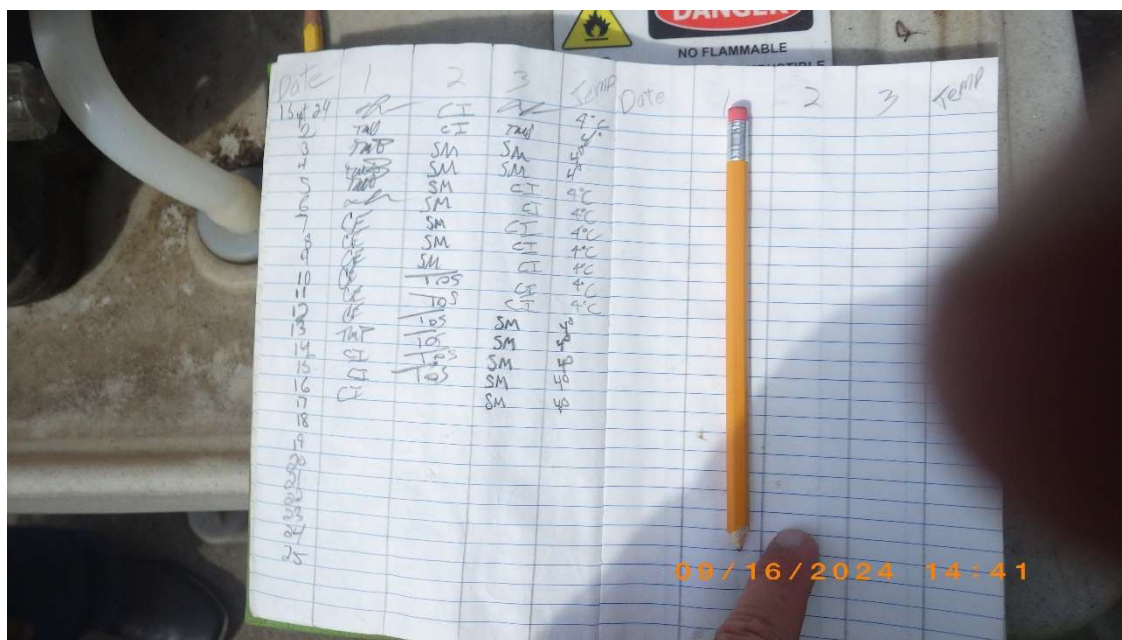


29: RIMG0029

Description: Sampling equipment for outfalls 001, B01, and 002.

Location: Northeast corner of plant.

Camera Direction: North Date/Time: 09/16/2024 2:39 PM



30: RIMG0030

Description: Auto-sampler log book.

Location: Outfall sampling location.

Camera Direction: Down Date/Time: 09/16/2024 2:41 PM



31: RIMG0031

Description: Autosampler control panel.

Location: Outfall sampling location.

Camera Direction: Down Date/Time: 09/16/2024 2:41 PM



32: RIMG0032

Description: Recirculation tank (red arrow) and outfall sampling location and autosampler (blue arrow).

Location: Northeast corner of plant.

Camera Direction: Northeast

Date/Time: 09/16/2024 2:43 PM



33: RIMG0033

Description: Extra pumps in case of pump failures.

Location: Storage building north of disk filter building.

Camera Direction: Northeast Date/Time: 09/16/2024 2:44 PM



34: RIMG0034

Description: Flow monitor located at excess flow facility.

Location: Excess flow facility.

Camera Direction: Down

Date/Time: 09/16/2024 2:46 PM



35: RIMG0035

Description: Excess flow facility (outall A01).

Location: Excess flow facility.

Camera Direction: Down

Date/Time: 09/16/2024 2:46 PM

WASTEWATER TREATMENT PLANT - VISITOR LOG						
Date	Visitor's Printed Name (Signature)	Office	Purpose of Visit/Chemical dropped off and QTY	Time (In/Out)	Signed out Key (Yes/No)	Plant Employee Initials
	REINER Busch REINER.Busch@us.af.mil	CEV	storm water Inspector / Sampler			
	Michael Welsh Michael.Welsh@us.af.mil	CEIOB	work leader			
	Amya Schroeder Amya.Schroeder.1@us.af.mil	AFCEC/ CZOH	AFCEC media manager			
	Joe WEBER joseph.weber.1@us.af.mil	AFCEC/ CZOH	AFCEC RESTORATION PROGRAM MGR			
	Michelle Engel michelle.engel@us.af.mil	CEIE	375 CEIE Water Quality Program Man.			
	Allison Newman allison.newman@us.af.mil	CEI	375 CEI Flight Chief			
	Brian Rodely brian.rodely@illinois.gov	IFPA	Inspection			
	Doug MITCHELL douglas.mitchell@us.af.mil	375 AFCEC CEOI	Fed EPA INSPECTION			

09/16/2024 15:28

Camera Direction: Down Date/Time: 09/16/2024 3:28 PM

Attachment D - Photo Log 2

Scott Air Force Base
EPA Inspection 09/17/2024
All photos taken by Benjamin Atkinson, Inspector, U.S. EPA
Camera: COOLPIX W300



1: DSCN0001

Description: Looking northwest at the industrial stormwater “OUTFALL 2” also called “O-SD1”. Note pipe with repair patch going over the waterway. (blue arrow) SAFB personnel stated that this pipe conveyed effluent from the wastewater treatment plant to the golf course pond.

Location: Northwest of the Salt Barn.

Camera Direction: Northwest

Date/Time: 09/17/2024 8:46 AM



2: DSCN4231

Description: Looking northwest at the industrial stormwater “OUTFALL 2”. Note pipe with repair patch going over the waterway. (blue arrow) SAFB personnel stated that this pipe conveyed effluent from the wastewater treatment plant to the golf course pond.

Location: Northwest of the Salt Barn.

Camera Direction: Northwest

Date/Time: 09/17/2024 8:51 AM



3: DSCN4232

Description: Looking southeast into the Salt Barn.

Location: Northwest of the Salt Barn.

Camera Direction: Southeast Date/Time: 09/17/2024 8:54 AM



4: DSCN4233

Description: Looking south at the culvert (blue arrow) under the access road to the landfill at stormwater “OUTFALL 3” also called “O-MC1” Note black pipe with red flange (red arrow). The SAFB personnel were unsure what the pipe was.

Location: Northeast of “OUTFALL 2” from stream bank.

Camera Direction: South Date/Time: 09/17/2024 8:57 AM



5: DSCN4234

Description: Looking south at the culvert (blue arrow) under the access road to the landfill at stormwater “OUTFALL 3” also called “O-MC1” The waterway is an unnamed tributary to Silver Creek. Note black pipe with red flange (red arrow). The SAFB personnel were unsure what the pipe was.

Location: Northeast of “OUTFALL 2” from stream bank.

Camera Direction: South Date/Time: 09/17/2024 8:58 AM



6: DSCN4235

Description: Looking north at the culvert (blue arrow) under the access road to the landfill at stormwater “OUTFALL 3” also called “O-MC1” Note black pipe with red flange (red arrow). The SAFB personnel were unsure what the pipe was.

Location: Northeast of “OUTFALL 2” from access road.

Camera Direction: North Date/Time: 09/17/2024 8:57 AM



7: DSCN4236

Description: Looking south at “OUTFALL 4” also called “O-MC2”. This is the confluence of the waste water treatment plant discharge and the unnamed tributary to Silver Creek.

Location: Northeast of waste water treatment plant. South side of the landfill.

Camera Direction: South Date/Time: 09/17/2024 9:03 AM



8: DSCN4237

Description: Looking south at “OUTFALL 4” also called “O-MC2”. This is the confluence of the waste water treatment plant discharge and the unnamed tributary to Silver Creek. Note black pipe similar to the one observed in photos 4-6 (red arrow).

Location: Northeast of waste water treatment plant. South side of the landfill.

Camera Direction: South Date/Time: 09/17/2024 9:04 AM



9: DSCN4238

Description: Stormwater inspection location “DA-9”

Location: Northeast of the intersection of Polk Street and East Drive.

Camera Direction: Northeast Date/Time: 09/17/2024 9:13 AM



10: DSCN4239

Description: East side of culvert under Scott Lake Road. Storm water sampling location named “OUTFALL 6” also known as “O-CC1”. Note how concrete has been poured to stabilize the stream bank.

Location: North of intersection of East Drive and Scott Lake Road.

Camera Direction: North Date/Time: 09/17/2024 9:20 AM



11: DSCN4240

Description: East side of culvert under Scott Lake Road. Storm water sampling location named “OUTFALL 6” also known as “O-CC1”. Note how concrete has been poured to stabilize the stream bank.

Location: North of intersection of East Drive and Scott Lake Road.

Camera Direction: Northeast Date/Time: 09/17/2024 9:20 AM



12: DSCN4241

Description: West side of culvert under Scott Lake Road. Storm water sampling location named “OUTFALL 6” also known as “O-CC1”. Note how concrete has been poured to stabilize the stream bank.

Location: North of intersection of Easte Drive and Scott Lake Road.

Camera Direction: Northwest

Date/Time: 09/17/2024 9:21 AM



13: DSCN4242

Description: Lake level control structure (blue arrow) located at the southeast corner of Scott Lake. SAFB personnel stated that this was the inlet of a pipe that outlets at storm water sampling location “OUTFALL 7” also known as “O-SL1”

Location: Southeast corner of Scott Lake

Camera Direction: Southwest

Date/Time: 09/17/2024 9:48 AM



14: DSCN4243

Description: Lake level control structure (blue arrow) located at the southeast corner of Scott Lake. SAFB personnel stated that this was the inlet of a pipe that outlets at storm water sampling location “OUTFALL 7” also known as “O-SL1”

Location: Southeast corner of Scott Lake

Camera Direction: Southwest

Date/Time: 09/17/2024 9:48 AM



15: DSCN4244

Description: Storm water sampling location “OUTFALL 7” also known as “O-SL1”. SAFB personnel stated that there was a submerged pipe that was the outlet for the lake level control structure seen in photo 14. At the time of the inspection, no surface water connection was observed, however a chanel was observed from the pool of water to the southeast toward the unnamed tributary of Silver Creek.

Location: East of Scott Lake.

Camera Direction: North

Date/Time: 09/17/2024

9:51 AM



16: DSCN4245

Description: Interior of the pump house on the north side of the Golf Course Pond. The Golf Course Pond is used for irrigation of the golf course and is the location of Waste Water Treatment Plant Outfall 003.

Location: Pump house north of Golf Course Pond.

Camera Direction: Down Date/Time: 09/17/2024 10:15 AM



17: DSCN4246

Description: Looking east along the north side of the golf cart hut. Note hoses leaking liquid which is flowing north to a concrete swale down to the unnamed tributary.

Location: North of the golf cart hut.

Camera Direction: East Date/Time: 09/17/2024 10:28 AM



18: DSCN4247

Description: Looking north along the concrete swale toward the unnamed tributary.

Location: North of the golf cart hut.

Camera Direction: North Date/Time: 09/17/2024 10:28 AM



19: DSCN4248

Description: Looking north down the stream bank into the unnamed tributary.

Location: North of the golf cart hut.

Camera Direction: North. Date/Time: 09/17/2024 10:29 AM

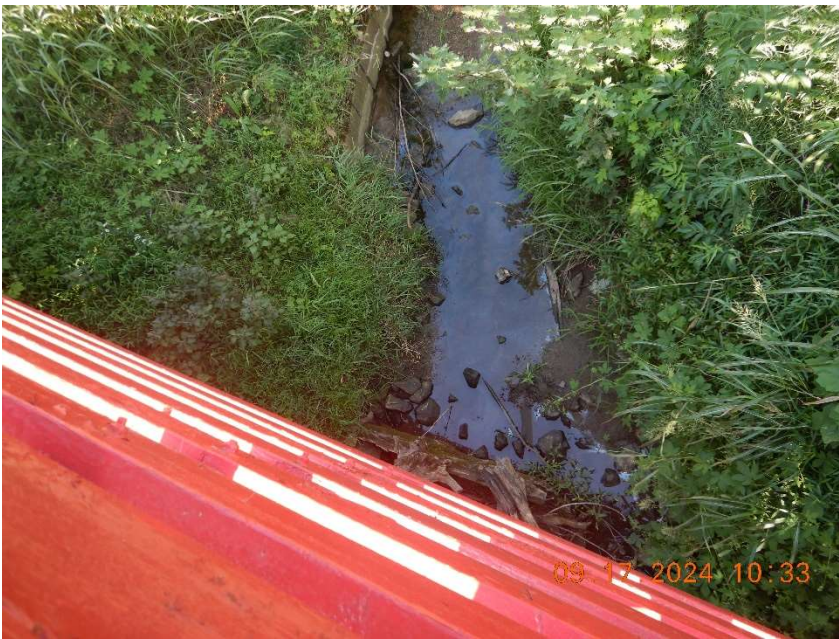


20: DSCN4249

Description: Looking downstream along the unnamed tributary at stormwater sampling location “INFLOW 1” which is also known as “I-CC1”.

Location: Golf cart bridge over unnamed tributary.

Camera Direction: Southeast Date/Time: 09/17/2024 10:31 AM



21: DSCN4250

Description: Looking upstream along the unnamed tributary at stormwater sampling location “INFLOW 1” which is also known as “I-CC1”.

Location: Golf cart bridge over unnamed tributary.

Camera Direction: Northwest Date/Time: 09/17/2024 10:33 AM



22: DSCN4251

Description: Ash Creek flowing south into culvert under Seibert Road. This is stormwater sampling location “INFLOW 2” which is also known as “I-AC1”.

Location: North side of culvert under Seibert Road north of Intersection of Ash Creek Drive and Seibert Road.

Camera Direction: Southeast Date/Time: 09/17/2024 10:50 AM



23: DSCN4252

Description: Unnamed tributary to Ash Creek flowing east onto SAFB at storm water sampling location “INFLOW 3” also known as “I-AC2”.

Location: Between Greenfield Circle and Metro Plaza Lane.

Camera Direction: Northwest Date/Time: 09/17/2024 11:10 AM



24: DSCN4253

Description: Storm water outfall at storm water pump station located at southwest corner of SAFB. This storm water sampling location is named “OUTFALL 8” and is also known as “O-PL1”

Location: Approximately 1,900 feet north of Carlyle Avenue and 2,148 feet east of Air Mobility Drive.

Camera Direction: Down Date/Time: 09/17/2024 11:27 AM



25: DSCN4254

Description: Storm water outfall at storm water pump station located at southwest corner of SAFB. This storm water sampling location is named “OUTFALL 8” and is also known as “O-PL1”

Location: Approximately 1,900 feet north of Carlyle Avenue and 2,148 feet east of Air Mobility Drive.

Camera Direction: Down Date/Time: 09/17/2024 11:27 AM



26: DSCN4255

Description: Storm water pump station which pumps to “OUTFALL 8”.

Location: Approximately 1,900 feet north of Carlyle Avenue and 2,148 feet east of Air Mobility Drive.

Camera Direction: East Date/Time: 09/17/2024 11:27 AM



27: DSCN4256

Description: Storm water observation point “DA-4” where a storm water swale goes under the SAFB fence to a culvert under Scott Drive.

Location: West of Scott Drive approximately 625 feet south of the intersection of Scott Drive and Illinois Highway 161.

Camera Direction: Northwest Date/Time: 09/17/2024 11:42 AM



28: DSCN4257

Description: The culvert under Scott Drive at storm water observation point "DA-4".

Location: West of Scott Drive approximately 625 feet south of the intersection of Scott Drive and Illinois

Camera Direction: Northeast

Date/Time: 09/17/2024

11:42 AM



29: DSCN4258

Description: Storm water sampling location "OUTFALL 1" also known as "O-AC1" at the confluence of Ash creek from the east and a SAFB storm water ditch from the north as the combined Ash Creek begins flowing Southeast.

Location: Approximately 95 feet south the railroad tracks and 760 feet east of Old Illinois 158.

Camera Direction: Southeast

Date/Time: 09/17/2024

11:59 AM



30: DSCN4259

Description: Looking west upstream along Ash Creek.

Location: Approximately 95 feet south the railroad tracks and 760 feet east of Old Illinois 158.

Camera Direction: West Date/Time: 09/17/2024 11:59 AM



31: DSCN4260

Description: Storm water sampling location “OUTFALL 1” also known as “O-AC1” at the confluence of Ash creek from the east and a SAFB storm water ditch from the north as the combined Ash Creek begins flowing Southeast.

Location: Approximately 95 feet south the railroad tracks and 760 feet east of Old Illinois 158.

Camera Direction: Southeast Date/Time: 09/17/2024 11:59 AM



32: DSCN4261

Description: Looking northwest along the storm water ditch flowing into storm water sampling location “OUTFALL 1” also known as “O-AC1” at the confluence of Ash creek from the east and a SAFB storm water ditch from the north as the combined Ash Creek begins flowing Southeast.

Location: Approximately 95 feet south the railroad tracks and 760 feet east of Old Illinois 158.

Camera Direction: Northwest Date/Time: 09/17/2024 11:59 AM



33: DSCN4262

Description: An eroded hole with fragments of a broken pipe in it.

Location: North bank of the south ditch approximately 190 feet east of the control structure seen in photo 37.

Camera Direction: Down Date/Time: 09/17/2024 12:43 PM



34: DSCN4263

Description: An eroded hole with fragments of a broken pipe in it.

Location: North bank of the south ditch approximately 190 feet east of the control structure seen in photo 37.

Camera Direction: Down Date/Time: 09/17/2024 12:44 PM



35: DSCN4264

Description: An eroded hole with fragments of a broken pipe in it.

Location: North bank of the south ditch approximately 190 feet east of the control structure seen in photo 37.

Camera Direction: Down Date/Time: 09/17/2024 12:44 PM



36: DSCN4265

Description: An eroded hole with fragments of a broken pipe in it.

Location: North bank of the south ditch approximately 190 feet east of the control structure seen in photo 37.

Camera Direction: Down Date/Time: 09/17/2024 12:44 PM



37: DSCN4266

Description: East side of control structure at the west end of the south ditch.

Location: South ditch approximately 1,140 feet east of Old Illinois 158

Camera Direction: Northwest Date/Time: 09/17/2024 12:46 PM



38: DSCN4267

Description: East side of control structure at the west end of the south ditch.

Location: South ditch approximately 1,140 feet east of Old Illinois 158

Camera Direction: South Date/Time: 09/17/2024 12:47 PM



39: DSCN4268

Description: East side of control structure at the west end of the south ditch.

Location: South ditch approximately 1,140 feet east of Old Illinois 158

Camera Direction: East Date/Time: 09/17/2024 12:47 PM



40: DSCN4269

Description: West side of control structure at the west end of the south ditch.

Location: South ditch approximately 1,100 feet east of Old Illinois 158

Camera Direction: Southwest Date/Time: 09/17/2024 12:47 PM



41: DSCN4270

Description: West side of control structure at the west end of the south ditch.

Location: South ditch approximately 1,100 feet east of Old Illinois 158

Camera Direction: Southwest Date/Time: 09/17/2024 12:47 PM



42: DSCN4271

Description: The south ditch flowing under the railroad bridge to the confluence with Ash Creek.

Location: The railroad bridge approximately 915 feet east of Old Illinois 158.

Camera Direction: West Date/Time: 09/17/2024 12:48 PM



43: DSCN4272

Description: The south ditch flowing under the railroad bridge to the confluence with Ash Creek.

Location: The railroad bridge approximately 915 feet east of Old Illinois 158.

Camera Direction: Southwest Date/Time: 09/17/2024 12:48 PM



44: DSCN4273

Description: The south ditch flowing under the railroad bridge to the confluence with Ash Creek.

Location: The railroad bridge approximately 915 feet east of Old Illinois 158.

Camera Direction: South Date/Time: 09/17/2024 12:48 PM



45: DSCN4274

Description: A culvert under the railroad track to the south receiving flow from the south ditch and storm water pipes coming from SAFB to the north.

Location: The south ditch approximately 590 feet east of the control structure seen in photo 37.

Camera Direction: South Date/Time: 09/17/2024 1:00 PM



46: DSCN4275

Description: A culvert under the railroad track to the south receiving flow from the south ditch and storm water pipes coming from SAFB to the north.

Location: The south ditch approximately 590 feet east of the control structure seen in photo 37.

Camera Direction: South Date/Time: 09/17/2024 1:01 PM



47: DSCN4276

Description: A culvert under the railroad track to the south receiving flow from the south ditch and storm water pipes coming from SAFB to the north.

Location: The south ditch approximately 590 feet east of the control structure seen in photo 37.

Camera Direction: South Date/Time: 09/17/2024 1:01 PM



48: DSCN4277

Description: A culvert under the railroad track to the south receiving flow from the south ditch and storm water pipes coming from SAFB to the north.

Location: The south ditch approximately 590 feet east of the control structure seen in photo 37.

Camera Direction: South Date/Time: 09/17/2024 1:02 PM



49: DSCN4278

Description: The south ditch flowing east into a culvert.

Location: The south ditch, approximately 2,000 feet east of the control structure seen in photo 37.

Camera Direction: West Date/Time: 09/17/2024 1:07 PM



50: DSCN4279

Description: The south ditch flowing east into a culvert.

Location: The south ditch, approximately 2,000 feet east of the control structure seen in photo 37.

Camera Direction: West Date/Time: 09/17/2024 1:07 PM



51: DSCN4280

Description: The south ditch flowing east into a culvert.

Location: The south ditch, approximately 2,000 feet east of the control structure seen in photo 37.

Camera Direction: West Date/Time: 09/17/2024 1:07 PM



52: DSCN4281

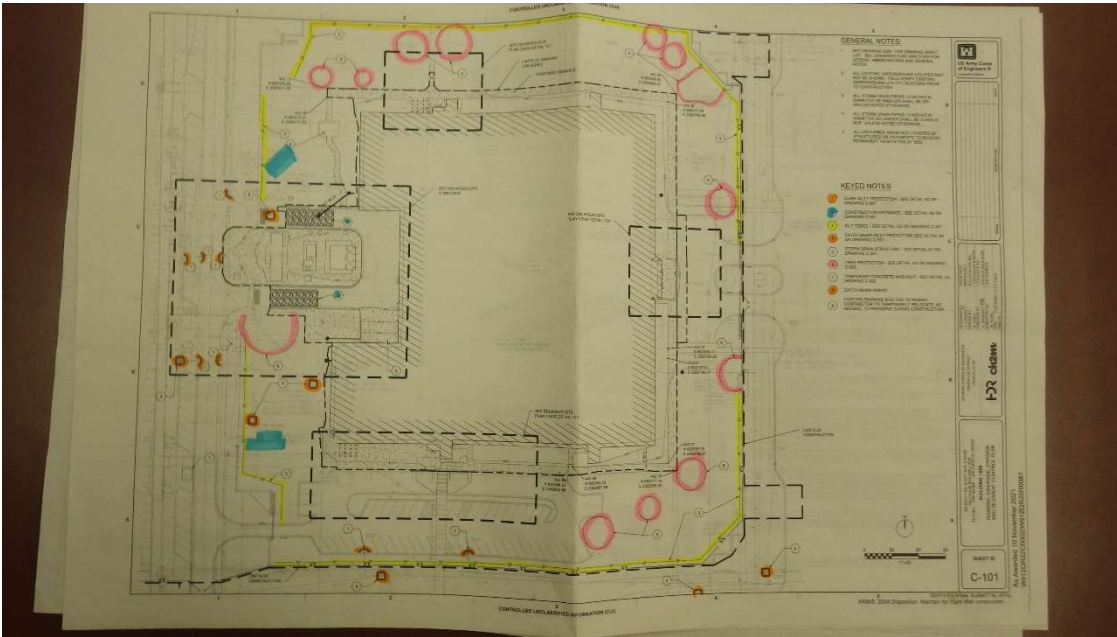
Description: The south ditch flowing east out of a culvert.

Location: The south ditch, approximately 2,500 feet east of the control structure seen in photo 37.

Camera Direction: Southwestest Date/Time: 09/17/2024 1:09 PM

Attachment D - Photo Log 3

Scott Air Force Base
EPA Inspection 09/18/2024
All photos taken by Benjamin Atkinson, Inspector, U.S. EPA
Camera: RICOH WG-4 GPS



1: RIMG0001

Description: Site plan with storm water BMPs highlighted.

Location: Construction trailer for Building 1600 project.

Camera Direction: Down Date/Time: 09/18/2024 9:18 AM

Stormwater Construction Site Inspection Report

General Information				
Project Name:	SAFB B1600 Renovation			
NPDES Permit #:	10R102360	Location:	SAFB	
Date of Inspection:	9-17-24	Start/End Time:	7:230	
Inspector's Name(s):	Nittiel Widman			
Inspector's Title(s):	Superintendent			
Inspector's Contact Information:	616-781-0737			
Describe present phase of construction:	Precast, Steel install			
Type of Inspection:	☒ Regular ☐ Pre-storm event ☐ During storm event ☐ Post-storm event			
Weather Information				
Has there been a storm event since the last inspection? ☒ Yes ☐ No				
If yes, provide:		Approximate Amount of Precipitation (in):		
Storm Start Date & Time:	Storm Duration (hrs):			
Weather at time of this inspection?				
☒ Clear ☐ Cloudy ☐ Rain ☐ Sleet ☐ Fog ☐ Snowing ☐ High Winds				
Other: Temperature: 65°				
Have any discharges occurred since the last inspection? ☒ Yes ☐ No				
If yes, describe: Rain, less than 1/2" on 9-15				
Are there any discharges at the time of inspection? ☐ Yes ☒ No				
If yes, describe:				
Site-specific BMPs • Number the structural and non-structural BMPs identified in your SWPPP on your site map and list them below (add as many BMPs as necessary). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required BMPs at your site. • Describe corrective actions initiated, date completed, and name the person that completed the work in the Corrective Action Log.				
	BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes
1	Stabilized Soils	☒ Yes ☐ No	☐ Yes ☒ No	
2	Curb Inlet Prot.	☒ Yes ☐ No	☐ Yes ☒ No	
3	Catch Basin Prot.	☒ Yes ☐ No	☐ Yes ☒ No	
4	Silt Fence	☒ Yes ☐ No	☐ Yes ☒ No	
5	Temp. Entrance	☒ Yes ☐ No	☐ Yes ☒ No	
6	Waste Protection	☒ Yes ☐ No	☐ Yes ☒ No	
7	Hazardous Prot.	☒ Yes ☐ No	☐ Yes ☒ No	
8	Camp Facilities	☒ Yes ☐ No	☐ Yes ☒ No	
9	Washout Facilities	☒ Yes ☐ No	☐ Yes ☒ No	

2: RIMG0002

Description: Example of Stormwater Construction Site Inspection Report reviewed on-site during inspection.

Location: Construction trailer for Building 1600 project.

Camera Direction: Down Date/Time: 09/18/2024 9:24AM

BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes
19	☐ Yes ☐ No	☐ Yes ☐ No	

Overall Site Issues			
BMP/Activity	Implemented?	Maintenance Required?	Corrective Action Needed and Notes
1. Are all slopes and disturbed areas not actively being worked properly stabilized?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
2. Are critical resource areas (e.g., streams, wetlands, mature trees, etc.) protected with barriers or similar BMPs?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
3. Are perimeter controls and sediment barriers adequately installed (keyed into substrate) and maintained?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
4. Are discharge points and receiving waters free of any sediment deposits?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
5. Are storm drain inlets properly protected?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
6. Is the construction exit preventing sediment from being tracked onto the street?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	Monitoring & Sweeping today
7. Silted/water run work areas collected and placed in dumpsters?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
8. Are dumpsters being maintained/cleaned to prevent overspill?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
9. Are washout facilities (e.g., paint, grease, concrete, masonry) available, clearly marked, and maintained?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
10. Are vehicle and equipment fueling, cleaning, and maintenance areas free of spills or leaks?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
11. Are materials that are potential stormwater contaminants stored inside or under cover?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
12. Are portable toilets secured to prevent	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	

3: RIMG0003

Description: Example of Stormwater Construction Site Inspection Report reviewed on-site during inspection.

Location: Construction trailer for Building 1600 project.

Camera Direction: Down Date/Time: 09/18/2024 9:24 AM

BMP/activity	Implemented?	Maintenance Required?	Corrective Action Needed and Notes
13. Are non-stormwater discharges (e.g., wash water, dewatering) properly controlled?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
14. (Other)	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	

Non-Compliance

Describe any instances of non-compliance not described above:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: Mitchell Williams Superintendent

Signature: [Signature] Date: 9-17-24

4: RIMG0004

Description: Example of Stormwater Construction Site Inspection Report reviewed on-site during inspection.

Location: Construction trailer for Building 1600 project.

Camera Direction: Down Date/Time: 09/18/2024 9:24 AM

Stormwater Construction Site Inspection Report

General Information			
Project Name:	SAB 1600 Renovation		
NPDES Permit #:	ILR:02BGU	Location:	SAFR
Date of Inspection:	9-20-24	Start/End Time:	7-7:30
Inspector's Name(s):	Michael Widman		
Inspector's Title(s):	Superintendent		
Inspector's Contact Information:	602-781-5737		
Describe present phase of construction:	Precast, steel install		
Type of Inspection: ☒ Regular ☐ Pre-storm event ☐ During storm event ☒ Post-storm event			
Weather Information Has there been a storm event since the last inspection? ☒ Yes ☐ No If yes, provide: Storm Start Date & Time: 9-13 Storm Duration (hrs): Approximate Amount of Precipitation (in): .5 Weather at time of this inspection? ☒ Clear ☐ Cloudy ☐ Rain ☐ Sleet ☐ Fog ☐ Snowing ☐ High Winds ☐ Other: Temperature: 75°			
Have any discharges occurred since the last inspection? ☒ Yes ☐ No If yes, describe: Rain			
Are there any discharges at the time of inspection? ☒ Yes ☐ No If yes, describe:			
Site-specific BMPs: • Number the structural and non-structural BMPs identified in your SWPPP on your site map and list them below (add as many BMPs as necessary). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required BMPs at your site. • Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.			
BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes
1 Stabilize Soils	☒ Yes ☐ No	☐ Yes ☐ No	
2 Curb Inlet Prot.	☒ Yes ☐ No	☐ Yes ☐ No	Sweeping Roads as needed
3 Catch Basin Prot.	☒ Yes ☐ No	☐ Yes ☐ No	
4 Silt Fence	☒ Yes ☐ No	☐ Yes ☐ No	
5 Temp Entrance	☒ Yes ☐ No	☐ Yes ☐ No	
6 Waste Protection	☒ Yes ☐ No	☐ Yes ☐ No	
7 Hazardous Prot.	☒ Yes ☐ No	☐ Yes ☐ No	
8 Temp Facilities	☒ Yes ☐ No	☐ Yes ☐ No	
9 Washout Facilities	☒ Yes ☐ No	☐ Yes ☐ No	

5: RIMG0005

Description: Example of Stormwater Construction Site Inspection Report reviewed on-site during inspection.

Location: Construction trailer for Building 1600 project.

Camera Direction: Down Date/Time: 09/18/2024 9:25 AM

BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes
10	☒ Yes ☐ No	☒ Yes ☐ No	

Overall Site Issues			
BMP/Activity	Implemented?	Maintenance Required?	Corrective Action Needed and Notes
1 Are all slopes and disturbed areas not actively being worked properly stabilized?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
2 Are natural resource areas (e.g., streams, wetlands, mature trees, etc.) protected with barriers of similar BMPs?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
3 Are perimeter controls and sediment barriers adequately installed (keyed into substrate) and maintained?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
4 Are discharge points and receiving waters free of any sediment deposits?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
5 Are storm drain inlets properly protected?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
6 Is the construction site preventing sediment from being tracked into the street?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
7 Is trash/litter from work areas collected and placed in dumpsters?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
8 Are dumpsters being maintained/emptied to prevent overflow?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
9 Are washout facilities (e.g., sand, stone, concrete, masonry) available, clearly marked, and maintained?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
10 Are vehicle and equipment fueling, cleaning, and maintenance areas free of spills or leaks?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
11 Are materials that are potential stormwater contaminants stored inside or under cover?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
12 Are portable toilets secured to prevent	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	

6: RIMG0006

Description: Example of Stormwater Construction Site Inspection Report reviewed on-site during inspection.

Location: Construction trailer for Building 1600 project.

Camera Direction: Down Date/Time: 09/18/2024 9:25 AM

BMP/Activity	Implemented?	Maintenance Required?	Corrective Action Needed and Notes
13. Piping and being maintained properly?	☒ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	
14. Are anti-stormwater discharges (e.g., wash water, dewatering) properly controlled? (Other)	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No ☐ N/A	

Describe any incidents of non-compliance not described above:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: Nicole Wilson Superintendent

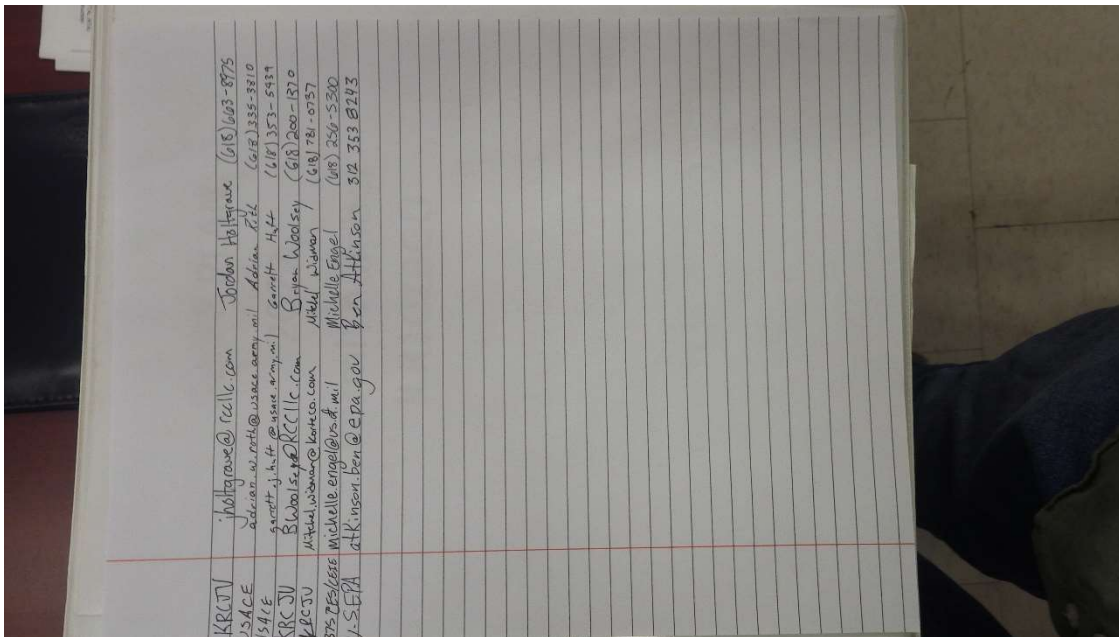
Signature: [Signature] Date: 8-20-24

7: RIMG0007

Description: Example of Stormwater Construction Site Inspection Report reviewed on-site during inspection.

Location: Construction trailer for Building 1600 project.

Camera Direction: Down Date/Time: 09/18/2024 9:25 AM



8: RIMG0008

Description: Sign in sheet for personnel present at the EPA inspection.

Location: Construction trailer for Building 1600 project.

Camera Direction: Down Date/Time: 09/18/2024 9:48 AM



9: RIMG0009

Description: Storm water drain inlet protection.

Location: Building 1600 construction site.

Camera Direction: Down Date/Time: 09/18/2024 9:53 AM



10: RIMG0010

Description: Silt fence along edge of disturbed area.

Location: West side of building 1600 construction site.

Camera Direction: North Date/Time: 09/18/2024 9:53 AM



11: RIMG0011

Description: Silt fence being pushed down by vegetation around stabilized dirt pile.

Location: Northwest side of building 1600 construction site.

Camera Direction: Northeast Date/Time: 09/18/2024 9:55 AM



12: RIMG0012

Description: Silt fence with holes in need of maintenance.

Location: Northwest side of building 1600 construction site.

Camera Direction: Northeast Date/Time: 09/18/2024 9:55 AM



13: RIMG0013

Description: Double silt fence around perimeter of disturbed area.

Location: North side of building 1600 construction site.

Camera Direction: East Date/Time: 09/18/2024 9:56 AM



14: RIMG0014

Description: Water flowing east off the construction site to a storm drain.

Location: East side of building 1600 construction site.

Camera Direction: Northeast Date/Time: 09/18/2024 10:01 AM



15: RIMG0015

Description: Water flowing east off the construction site to a storm drain. Note sediment in flow path of water.

Location: East side of building 1600 construction site.

Camera Direction: North Date/Time: 09/18/2024 10:01 AM



16: RIMG0016

Description: Water flowing east off the construction site to a storm drain. Note sediment in flow path of water.

Location: East side of building 1600 construction site.

Camera Direction: Northwest

Date/Time: 09/18/2024

10:01 AM



17: RIMG0017

Description: Water flowing east off the construction site to a storm drain. Note sediment in flow path of water.

Location: East side of building 1600 construction site.

Camera Direction: North

Date/Time: 09/18/2024

10:02 AM



18: RIMG0018

Description: Water flowing east off the construction site to a storm drain. Note sediment in flow path of water. Note red hose which is the source of the water (red arrow). SAFB personnel stated that the hose was attached to a pump that had been used to dewater an elevator shaft and that site personnel had been instructed to ensure that future dewatering activities discharged to areas of the site that would allow for filtering and infiltration.

Location: East side of building 1600 construction site.

Camera Direction: Northwest

Date/Time: 09/18/2024

10:03 AM



19: RIMG0019

Description: Filter fabric around storm water drain inlet.

Location: Southeast corner of building 1600 construction site.

Camera Direction: North

Date/Time: 09/18/2024

10:06 AM



20: RIMG0020

Description: Curb drain protection.

Location: Southeast corner of building 1600 construction site.

Camera Direction: North Date/Time: 09/18/2024 10:06 AM



21: RIMG0021

Description: Dumpster being utilized as concrete washout.

Location: Southwest corner of building 1600 construction site.

Camera Direction: West Date/Time: 09/18/2024 10:10 AM



22: RIMG0022

Description: Filter fabric around and under storm water drain inlet adjacent to concrete washout. Note white deposits on the inside of the filter fabric.

Location: Southwest side of building 1600 construction site.

Camera Direction: Down Date/Time: 09/18/2024 10:11 AM



23: RIMG0023

Description: Silt fence on the west side of the building 1600 construction site that has been knocked down by dirt pile.

Location: West side of building 1600 construction site.

Camera Direction: North Date/Time: 09/18/2024 10:12 AM



24: RIMG0024
 Description: Blue hose from white vertical pipe (left) to ajar manhole (right).
 Location: West side of building 1600 construction site.
 Camera Direction: Northeast Date/Time: 09/18/2024 10:14 AM



25: RIMG0025
 Description: Blue hose from white vertical pipe (left) to ajar manhole (right).
 Location: West side of building 1600 construction site.
 Camera Direction: Northeast Date/Time: 09/18/2024 10:14 AM

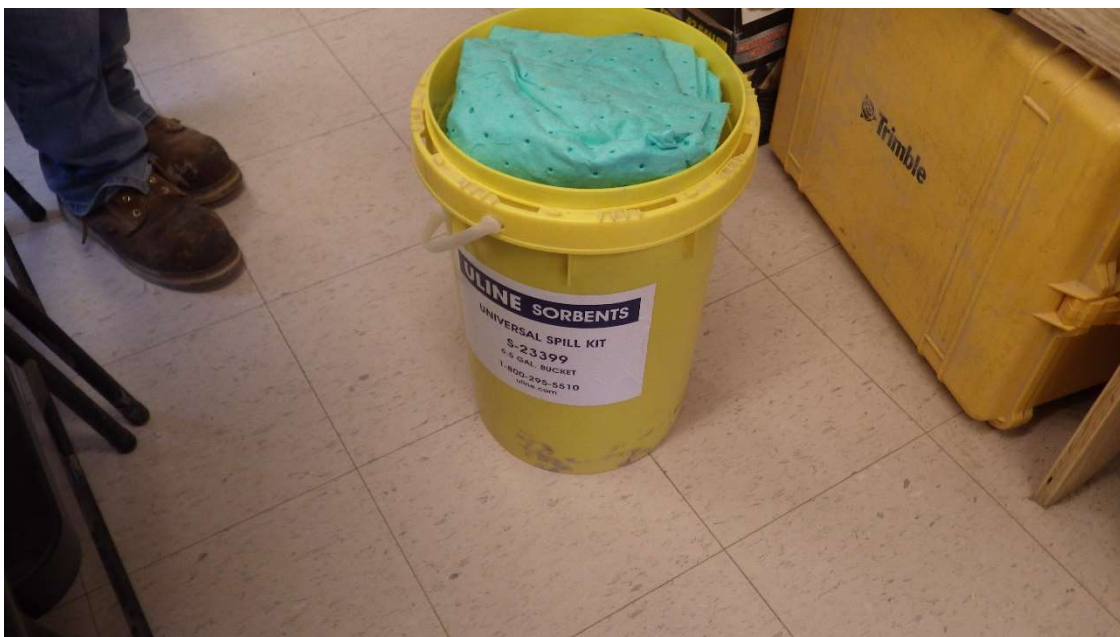


26: RIMG0026

Description: Storm water inlet protection in parking lot west of construction site. This area is outside the disturbed area and personnel stated they added the inlet protection as a precaution but it is not called for in the SWPPP.

Location: Parking lot west of building 1600 construction site.

Camera Direction: West Date/Time: 09/18/2024 10:16 AM

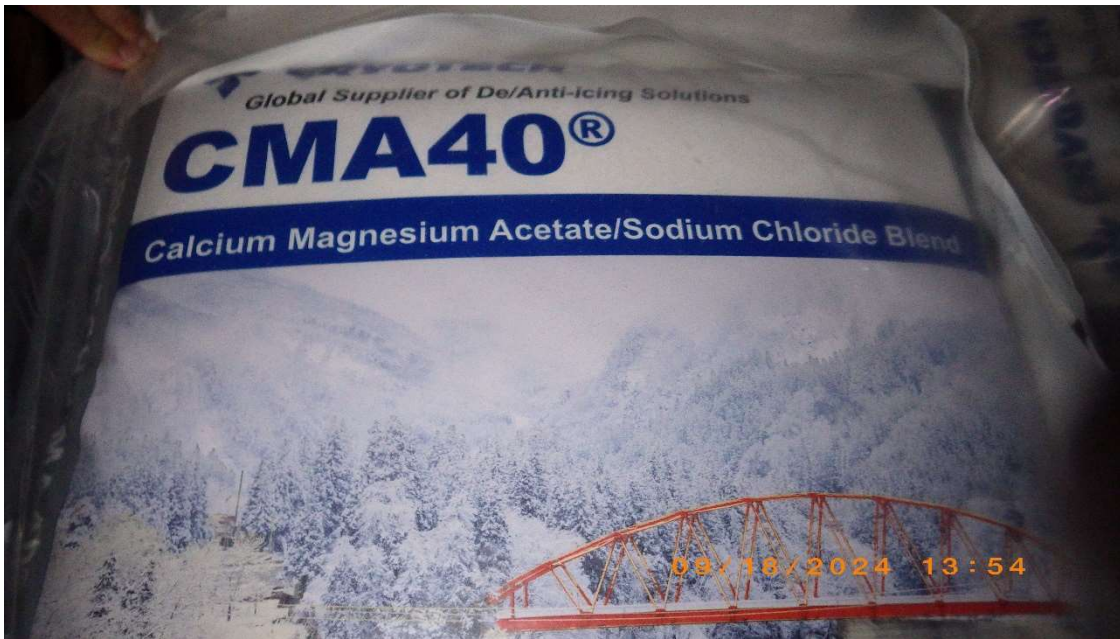


27: RIMG0027

Description: Example of spill kit available on-site at the building 1600 construction site.

Location: Construction trailer at the building 1600 construction site.

Camera Direction: Down Date/Time: 09/18/2024 10:18 AM



28: RIMG0028

Description: Bags of de-icing product stored in the Salt Barn.

Location: Salt Barn

Camera Direction: Down Date/Time: 09/18/2024 1:54 PM



29: RIMG0029

Description: De-icing product stored in the Salt Barn.

Location: Salt Barn.

Camera Direction: Down

Date/Time: 09/18/2024

1:54 PM



30: RIMG0030

Description: 250 gallon tanks of “Geomelt 55” beet juice additive stored on the south side of the Salt Barn.

Location: South side of the Salt Barn.

Camera Direction: Southeast

Date/Time: 09/18/2024

1:55 PM



31: RIMG0031

Description: 250 gallon tanks of “Geomelt 55” beet juice additive stored on the south side of the Salt Barn.

Location: South side of the Salt Barn.

Camera Direction: Southeast

Date/Time: 09/18/2024

1:55 PM



32: RIMG0032

Description: Collection pit in the pesticide mixing area.

Location: Covered pesticide loading area.

Camera Direction: East Date/Time: 09/18/2024 2:21 PM



33: RIMG0033

Description: Spill container in one of the pesticide buildings.

Location: Interior of pesticide storage building.

Camera Direction: Down Date/Time: 09/18/2024 2:22 PM



36: RIMG0036

Description: The hose seen in photo 35 going down into the reception pit in the pesticide mixing containment area.

Location: The covered pesticide loading area.

Camera Direction: East

Date/Time: 09/18/2024

2:26 PM



37: RIMG0037

Description: Sand bags to direct storm water away from the storm water drain adjacent to the pesticide storage building.

Location: Pesticide storage building.

Camera Direction: Northwest

Date/Time: 09/18/2024

2:26 PM