

REPORT OF CONSTRUCTION STORM WATER INSPECTION

AT

Raytown High School New Auxiliary Gym

6019 Blue Ridge Blvd.
Raytown, Missouri 64133

NPDES General Permit: **MORA23892**

Owner

Raytown Quality Schools
5911 Blue Ridge Blvd
Raytown, Missouri 64133
816-813-1406

Operator

Newkirk Novak Construction Partners
11200 W 79th Street,
Lenexa, Kansas 66214
(816) 268-7160

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY-REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH / DRINKING WATER AND INSPECTIONS SECTION (WB/DWIS)

JANUARY 30, 2024

INTRODUCTION

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Compliance Evaluation Inspection (Construction Stormwater) was conducted on January 30, 2024, at the Raytown High School New Auxiliary Gym project, in Raytown, Missouri. The inspection was conducted under the authority of Section 308 of the Clean Water Act, as amended. It was conducted in accordance with the U.S. Environmental Protection Agency (EPA) Region 7 Standard Operating Procedures for Compliance Inspections (ENST SOP No. 2332). This narrative report presents the findings of the inspection.

PARTICIPANTS

Site Contractors – Newkirk Novak Construction Partners

- Bryan Gosseen, Superintendent bryan.gosseen@newkirknovak.com
- Branson Kocher, Project Manager branson.kocher@newkirknovak.com

City of Raytown

- Jason Hanson, City Engineer, MS4 Program Manager jasonh@raytown.mo.us
- Kevin Sawyer, Right-of-Way/Project Inspector, PWD kevins@raytown.mo.us
- Andy Boyed, Building Official, Community Development gandyb@raytown.mo.us

U.S. Environmental Protection Agency (EPA), Region 7

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS

PROCEDURES

I, Naji Ahmad, along with Messrs. Jason Hanson, Kevin Sawyer, and Andy Boyed arrived at the

Raytown High School New Auxiliary Gym project site at 10:10 A.M. on January 30, 2024. At the time of our arrival, workers were installing the precast walls of the new gymnasium. Mr. Bryan Gosseen, site superintendent, however, was not on site. Mr. Boyed called Mr. Gosseen and informed him of our visit. Mr. Gosseen informed us that he is at a nearby at project site and that he is on his way to meet us. In the meantime, I inspected the curb stormwater inlet on 61st Street, and the vehicular track outs on 61st Street from the two site entrances (Photos 1-8, Attachment 9).

Approximately at 10:35 AM, Mr. Gosseen arrived at the site. I introduced myself, presented my credentials, and I explained the purpose of the stormwater compliance evaluation inspection that evaluates the site's level of compliance with the requirements of the Missouri National Pollutant Discharge Elimination System (NPDES) number MORA23892 (Attachment 2). I also explained the procedures of the inspection. These included completing the Region 7 Construction Storm Water Worksheet (Attachment 1), evaluating the Stormwater Pollution Prevention Plan (SWPPP) and self-monitoring and stormwater management practices, and conducting a facility walk-through with photographs (Attachment 9).

I started the inspection by discussing with Mr. Gosseen the requirements of the NPDES permit and erosion controls. Mr. Gosseen provided me with the SWPPP folder that included the SWPPP (Attachment 3), site plans, site inspection reports (Attachment 4), and several pages from the site plan that are marked up (Attachment 5).

Soon after, Mr. Gosseen escorted us on a visual inspection of the site. I visually inspected the vehicular track out from the two entrances of the site onto 61st Street and three stormwater curb inlets, the site's stormwater system (Photos 13-18), silt fence installed along the south and east perimeters of the site (photos 19-21), evidence of sediment entering outfall 01 (concrete flume) leading to the Raytown Municipal Separate Stormwater System (MS4) (photos 22 and 23), and evidence of erosion at the southeast corner of the site (photo 25) causing sediment to leave the site onto private road and flow into one of Raytown MS4 (municipal separate stormwater system) BMPs (best management practice) (photos 24 - 28).

At the end of the day, I held a formal exit meeting with Messrs. Gosseen, Hanson, Sawyer, and Boyed, and I discussed my preliminary observations of the site. I informed Mr. Gosseen that I will issue a Notice of Preliminary Findings (NOPF) and email it to him.

On February 12, 2024, I emailed Mr. Gosseen the NOPF. On February 14, 2024, I received an email from Mr. Branson Kocher that included the signed NOPF and Newkirk Novak's response to the January 30, NOPF.

SITE DESCRIPTION

The project consisted of clearing and grading 2.1 acres of exiting parking and vacant lots for the construction of a new auxiliary gymnasium building with utilities and pavement for Raytown High School (RHS) at 6019 Blue Ridge Blvd. The site is located on the south side of 61st Street cross the street from RHS. The project is owned by the Raytown Quality School District and

managed by Newkirk Novak Construction Partners. The project started on September 17, 2023. The estimated project completion date is in December 2024.

Figure 1, Raytown High School New Auxiliary Gym project site



FINDINGS AND OBSERVATIONS

1. The Missouri Department of Natural Resources (MDNR) granted the Raytown Quality School District the authorization of a storm water discharge associated with construction activity under the NPDES permit number MORA23892 on April 6, 2023, through February 7, 2027 (Attachment 2).
2. The SWPPP was prepared by MKEC Engineering, Inc. in January 2023 (Attachment 3).
3. Site inspections are conducted by Shawn Swearingen and Travis Swearingen with Mid States Excavating, Inc. The first documented inspection was on September 17, 2023, and the last documented inspection prior to my site visit was on January 14, 2024 (Attachment 4). There are a total of 21 documented inspections, six of which are after rain events of one inch and above.
4. The inspection reports identified inlet barriers, silt fence/sediment barriers, construction entrances, and permanent vegetation as point on concerns. However, records indicate that inspectors started inspecting and noting intel barriers and construction entrances points starting on the thirteen-inspection event which was on December 6, 2023. Prior to that,

inspection reports only noted the silt fence/sediment barriers on the east property and permanent vegetation. Therefore, the inspections did not encompass all the BMPs, outfalls, and entire site

5. I issued Notice of Preliminary Finding Number 1 (NOPF #1) because I noticed a significant amount of sediment on 61st Street caused by vehicular trackout from the construction site as shown in photo 3 below.

Photo 3, Sediment trackout onto 61st Street from the construction site



6. During the inspection I pointed out to the site operator that one of the two entrances to the site did not have any controls to prevent vehicular trackout onto the public road (61st Street). Therefore, I issued NOPF #2 because site operator failed to provide sediment controls at the site's entrance which caused sediment trackout onto 61st Street as shown in photo 4 below.

Photo 4, Lack of BMPs at one of the site's entrances.



7. I issued NOPF #3 because the site operators, inspectors, and the SWPPP failed to identify the three stormwater curb inlets on the south side of 61st Street as points of concern and failed to provide sediment controls at the three inlets as shown in photo 5 below. I also noticed evidence of sediment entering the inlets. Those stormwater inlets lead to the Raytown MS4.

Photo 5, Sediment entering the stormwater inlet curb at 61st Street.



8. I issued NOPF #4 because there was a deficient section of the silt fence with sediment accumulation that overcome the fence and entered the pathway to outfall 01 on the east side of the property as shown in photo 21 below.

Photo 21, Sediment accumulation against a section on silt fence.



9. I also issued NOPF #5 because I observed sediment from the site entering outfall 01. The outfall did not have any controls. I observed murky discharge from outfall 01. Outfall 01 discharges into the Raytown MS4.

Photo 23, Outfall 01 with no sediment controls.



10. I issued NOPF #6 because during my visual inspection of the middle southeast corner of the site (marked as NOPF #6 on figure 1 above) I noticed evidence of sediment leaving the site onto the adjacent private property. I pointed out to Mr. Gosseen that this surface runoff is a discharge point and must be identified as such on the site map and the SWPPP. I also pointed out, that the surface runoff would flow south approximately 45 feet into the Raytown MS4 underground detention basin across the street as shown in photo 24 below.

Photo 24, Sediment leaving the site into the adjacent private property.



11. As mentioned above, on February 14, 2024, I received an email from Mr. Branson Kocher that included the signed NOPF and Newkirk Novak response to my January 30, NOPF.

CONCLUSION

1. I observed discharge from outfall 01. Outfall 01 discharges into the Raytown's MS4.
2. The site operator responded to the observations I noted on the NOPF and took corrective action accordingly in a timely manner (Attachment 8).

NAJI AHMAD Digitally signed by NAJI AHMAD
Date: 2024.02.26 11:48:24 -06'00'

Naji J. Ahmad
Environmental Engineer WB/DWIS

JODI BRUNO Digitally signed by JODI BRUNO
Date: 2024.02.26 12:01:39 -06'00'

Jodi Bruno
Manager, Water Branch

ATTACHMENTS

1. Region 7 Industrial Storm Water Worksheet (Construction)
2. NPDES permit
3. SWPPP Folder
4. Site inspections
5. Marked up site plans
6. NOPF
7. E-mails
8. Response to the NOPF
9. Photo Log