REPORT OF COMPLIANCE EVALUATION INSPECTION
(CONSTRUCTION STORM WATER)

AT
Birchwood Grove Development - Construction
4607 E. 53rd Street
Davenport, Iowa 52807

Owner
Dan Dolan Homes
2660 E. 53rd Street, Davenport, Iowa 52807

Iowa NPDES General Permit: **IA-39861-39484**

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

ON
AUGUST 18, 2022

INTRODUCTION

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Compliance Evaluation Inspection (Construction Stormwater) was conducted on August 18, 2022, at the Birchwood Grove Development project site in Davenport, Iowa. 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. All other documentation not included as an attachment to this report has been submitted directly to the Region 7 Records Center.

PARTICIPANTS

Birchwood Grove Development Project Site

- Kevin Dolan, Site Manager, Don Dolan Homes
- Kyle C. Fentress, Vice President, Stormwater And Management Services

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

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

PROCEDURES

I, Naji Ahmad, arrived at the Birchwood Grove Development Project site at 10:00 A.M. on August 18, 2022. I met with Messrs. Kyle C. Fentress and Kevin Dolan. I introduced myself, presented my credentials, and I explained the purpose of the stormwater compliance evaluation inspection. The inspection will evaluate the site's level of compliance with the requirements of the Iowa National Pollutant Discharge Elimination System (NPDES) General Permit No. 2 (GP2) number IA39861-39484 (Attachment 2), which will expire on September 1, 2024. I also explained the procedures of the inspection. These included completing the Region 7 Construction Storm Water Worksheet (Attachment 1), completing the Receipt for Documents and Samples Form and the US EPA Confidentiality Notice, evaluating the Stormwater Pollution Prevention Plan (SWPPP) (Attachment 3) and self-monitoring and stormwater management practices (Attachment 4), and conducting a facility walk-through with photographs (Attachment 6).

I started the inspection by discussing with site personnel the requirements of the Iowa NPDES GP2 and erosion controls. Site personnel presented me with a three-ring binder that included the site's SWPPP, site plan, and site inspection records.

Soon after, site personnel escorted me on a visual inspection of the site. I inspected several stormwater inlets covered with silt fabric, the southwest detention basin and its outlet, the Stafford Creek that runs along the southwest side of the site, a concrete washdown area, and the Southeast detention basin and its outlet.

At the end of the day, I held a formal exit meeting with Messrs. Fentress and Dolan. I discussed my preliminary observations of the site and I informed them that I will issue, and email them, a Notice of Preliminary Findings (NOPF). I also informed them that I would communicate to them findings that I may discover during my review of the SWPPP and site inspection records upon my return to the office.

On August 18, 2022, I received two emails from Mr. Fentress. The first email included the site SWPPP and weekly site inspections. The second email included corrective action taken as a response to the NOPF.

SITE DESCRIPTION AND DRAINAGE

Birchwood Grove Development is a 20.0-acre multifamily residential development located in Davenport at the border of the City of Bettendorf. It is bounded by a single-family residential properties to the west, south, and east, and proposed commercial development to the north. The site is located south of 53rd Street, east of Hamilton Drive, north of E 49th Avenue, and west of Dove Court.

Site drainage is directed to surface flow into the site's underground storm system leading to two detention basins. The Southwest detention basin will discharge directly into Stafford Creek. Stafford Creek would flow south approximately 1.5 miles into Duck Creek. The Southeast detention basin would discharge directly into the City of Bettendorf Separate Storm Sewer System (MS4) at Hawk Drive.

FINDINGS AND OBSERVATIONS

1. Overall, the site was free of trash and debris, and good housekeeping practices were observed.

2. The site is operating under the Iowa Department of Natural Resources (IDNR) GP2 that will expire on September 1, 2024.

3. The SWPPP (Attachment 3) and site inspection records (Attachment 4) appeared adequate and well maintained.

4. At the time of the inspection, I did not observe discharge from the site. The site was well stabilized and seeded.

5. Overall, erosion and sediment controls were adequate. With the exception of the following:

   a. Missing section of the silt fence (approximately 30 feet) directly front of the outlet of the southwest detention basin where it discharges into Stafford Creek.

   Therefore, I issued NOPF #1 for inadequate protection of the stream. On August 18, 2022, I received an email from site personnel that included photos of corrective action. In the email, site personnel indicated that, *"The fence was removed near the unnamed creek running on the West side of the site and was scheduled to be replaced later this week. No precipitation was forecast during this period, and no precipitation had occurred between silt fence removal and new filter sock installation today. All areas up slope have been hydroseeded with Flexterra FGM hydraulic mulching. Area between disturbed soil and creek bank remains fully vegetated with a 93" inch vegetated buffer strip. No evidence is present of sediment leaving the site. No sediment has been deposited in the creek or in the vegetated buffer strip. Several 12" filter sock have been installed as perimeter control and ditch checks in this area in the interim, to prevent sediment from leaving the site. Riprap is scheduled to be installed below the Flared end section of pipe as shown in the site drawings on page C-103."*

   b. Stormwater inlet located on the north side of Ravenwood Lane had sediment accumulation over the silt fabric cover. On August 18, 2022, site personnel responded indicating that, *"Inlet protection located on the North side of Ravenwood Ln had become dislodged. Inlet protection device was removed, inspected and reinstalled properly."*

   c. The stormwater inlet located near the south end of Lakeside Parkway had debris in it. On August 18, 2022, site personnel responded indicating that, *"debris was removed and Inlet protection was reinstalled."*

   d. The mortar mixing station has minor mortar on the ground, but no washout was noted. On August 18, 2022, site personnel responded indicating that, *"A 9" filter sock was installed to prevent any sediment or mortar from entering the roadway. Bricklaying crew was also advised to clean mixing station on a regular basis."*

CONCLUSION

Overall, the site was free trash and debris, and good housekeeping practices were observed. The SWPPP and site inspection records appeared adequate and well documented.

Stafford Creek was flowing, and I did not observe sediment in the creek.

Site personnel took the necessary corrective action in response to the NOPF the day of the inspection.

NAJI AHMAD Digitally signed by NAJI AHMAD Date: 2022.10.18 16:56:44 -05'00'

Naji J. Ahmad
Environmental Engineer

NICOLE MORAN Digitally signed by NICOLE MORAN Date: 2022.10.18 17:12:05 -05'00'

Nicole Moran
Section Chief, DWIS

ATTACHMENTS

1. Region 7 Industrial Storm Water Worksheet (Construction)
2. NPDES GP #2
3. Site SWPPP
4. Site inspections
5. Photo log
6. Site photos
7. NOPF
8. Response to the NOPF
9. Emails