

REPORT OF CONSTRUCTION STORMWATER COMPLIANCE EVALUATION INSPECTION (CEI)

**Iowa Army Ammunition Plant (IAAAP)
D Yard Railroad Upgrade
17575 DMC Hwy 79
Middletown, IA
NPDES NO: IA40943-40569**

June 13-16, 2022

BY

U. S. ENVIRONMENTAL PROTECTION AGENCY
Region 7 Enforcement and Compliance Assurance Division (ECAD)

INTRODUCTION

I performed a Compliance Evaluation Inspection (CEI) at the construction site of the IAAAP D Yard Railroad Upgrade project in Middletown, Iowa from June 13, 2022, through June 16, 2022. The inspection was authorized by Section 308(a) of the Federal Water Pollution Control Act, as amended. I conducted this inspection in accordance with the procedures described herein and followed all applicable EPA Region 7 standard operating procedures. This narrative report presents the findings of the inspection.

PARTICIPANTS

American Ordnance (AO)

William Hilger (not present during inspection) 319-753-7992, william.hilger@aolc.biz
Jim Timmons 319-753-7721, jim.timmons@aolc.biz
Keith Miller
Brent Bennett, Maintenance Engineer Manager

IAAAP

LTC (Lieutenant Colonel) Jason Crist, Commander (present during exit meeting only)
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Randy Doyle, Environmental Coordinator, 319-753-7103, randy.a.doyle.civ@mail.mil

Meller Excavating & Asphalt, Inc.

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U.S. Environmental Protection Agency (EPA):

Hannah Lewis, Life Scientist (913) 551-7679, lewis.hannah@epa.gov
Joseph Heafner, Life Scientist

INSPECTION PROCEDURES

Mr. Heafner informed Mr. Doyle of our inspection intentions on June 8, 2022. We arrived at the IAAAP front desk on June 13, 2022 at 1:00 pm. For access to the facility, IAAAP personnel required that we provide personally identifiable information (PII) to conduct a background

check. At that point, we left the facility and contacted Mr. Dan Breedlove (USEPA Region 7), Ms. Kristian Nazar (USEPA Region 7), and Ms. Chelsea Dixon (USEPA Headquarters) for guidance. We returned to the facility on June 14, 2022 and agreed to provide our PII to the U.S. Department of Defense (USDOD) employees and not to contracted security personnel in order for the background checks to occur. After being cleared by security, we re-introduced ourselves to Mr. Doyle, Mr. Timmons, and Mr. Miller, presented our credentials, and explained the purpose and procedures of the inspection. Mr. Heafner was conducting a separate compliance sampling inspection during this same time period pertaining to the IAAAP's National Pollution Discharge Elimination System (NPDES) permit number IA0022144.

On June 15, 2022, Mr. Heafner and I met with Messrs. Meller, Bennett, Timmons, and Miller at the IAAAP Solid Waste Processing Facility. We introduced ourselves, presented our credentials, and explained the purpose and procedures of the inspection. I informed the gentlemen that I would be performing a complete construction stormwater inspection under the authority of Section 308(a) of the Federal Water Pollution Control Act to evaluate the facility's compliance status with the requirements of the Clean Water Act and with the NPDES permit, which was issued by the Iowa Department of Natural Resources (IDNR) (attachment 7). I explained that the inspection would consist of a review of required records, a review of the Storm Water Pollution Prevention Plan (SWPPP), and a visual inspection of the facility. I stated that I would document my findings and observations by making photocopies, taking photographs and/or videos, and obtaining statements from facility staff.

I completed the visual inspection on June 15, 2022. I summarized the findings and recommendations of the visual inspection with Messrs. Doyle, Timmons, and Miller and LTC Crist during the exit meeting on June 16, 2022. A Notice of Preliminary Findings (NOPF) was issued by me during the exit meeting (attachment 4). Photographs were taken during the inspection. See attachment 2 for the digital photographs and photo log. See attachment 3 for the site layout.

FACILITY DESCRIPTION

Facility Operations

IAAAP is owned by the US Department of the Army and operated under contract by American Ordnance. The facility produces various sized munitions for the Department of the Army and US allies. The facility is approximately 19,000 acres in size and is located near Middletown, Iowa. American Ordnance oversees the Yard D Railroad Upgrade construction project. The project site is located on the IAAAP property within Yard D (attachment 5). American Ordnance obtained authorization to discharge stormwater under the IDNR NPDES General Permit #2 on April 20, 2022.

The project consists of replacing all the existing 90-pound rail with new 115-pound rail, all cross ties, switch ties, turnouts, rail culverts, and rail crossings along 11.63 miles of railroad track within Yard D. Meller Excavating is contracted to install and maintain the stormwater controls, remove the existing culverts, and install the new culverts. Meller Excavating is also tasked with implementing the SWPPP. Capital Railroad is contracted to upgrade the railroad track components such as rails and ties.

Stormwater from Yard D drains south along the railroad tracks, through multiple culverts, and into tributaries (photos 3, 5, 6). Once stormwater reaches the south fencing, it continues south to Brush Creek (photos 9-11). Brush Creek remains within the IAAAP facility for approximately one more mile before crossing the facility boundary.

FINDINGS AND OBSERVATIONS

The following findings were noted during the visual and record review. A summary is provided in the NPDES Storm Water Worksheet (Construction) (attachment 1). The visual inspection findings were discussed with Messrs. Doyle, Timmons, and Miller and LTC Crist during the exit meeting. The weather conditions at the time of the inspection were sunny and 90°F. According to Iowa State University's Mesonet website, a cumulative 0.80 inches of rainfall was recorded in the area during the previous seven days.

Storm Water Pollution Prevention Plan (SWPPP)

The NPDES permit requires the permittee to develop and implement a SWPPP. I was provided a paper copy of the SWPPP for on-site review and later an electronic version (attachment 5). I reviewed the SWPPP and site inspections for compliance with the NPDES permit.

During the inspection, it appeared the required site inspection frequency had not been met. This is included as a finding on the NOPF (attachment 4). After a review of additional documentation, it was determined that all the site inspections were present. Thus, the potential finding on the NOPF is resolved.

Other Visual Observations

During the inspection, I observed activities across the site. Crews were actively removing existing culverts and installing new culverts. As seen in the photos 1 through 5, the area disturbed for small culvert removal and replacement is minimal. Rip rap and straw wattles were being used at larger culvert sites due to the potential for large stormwater flows while only rip rap at the smaller culvert sites was needed. Vegetation surrounding the culverts is left in place. The slope shown in photos 7 and 8 had not been seeded due to ongoing land disturbing activities, but it was recommended during the inspection to install additional stabilization measures along the slope until final stabilization is achieved.

SUMMARY

Overall, the site was well maintained, and pollutants were not noted in the discharge pathways. On June 28, 2022, Mr. Hilger emailed a response to the NOPF (attachment 6). As stated above, the potential finding in the NOPF was resolved.

There were multiple SWPPP versions uploaded by Mr. Timmons, so Mr. Doyle submitted a final version on June 23, 2022. This version is included in attachment 6.

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Hannah Lewis
Life Scientist

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Nicole Moran
Section Chief, DWIS

ATTACHMENTS:

1. NPDES Storm Water Worksheet (Construction) (6 pages)
2. Photo Log and Photos (7 pages)
3. Site Layout with Photo Locations (1 page)
4. NOPF (2 pages)
5. SWPPP (57 pages)
6. Responses to NOPF (64 pages)
7. IDNR NPDES General Permit #2 (59 pages)