

U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303
Water Compliance Inspection Report

FACILITY DATA

NPDES ID: SCR10ZEED, SCR10ZEW3 **Effective Date:** March 01, 2021 **Expiration Date:** February 28, 2026

Facility: Project Connect Phase 2 Mass Grading and Drainage Improvements **SIC Code:** Construction

Address: 501 Blythewood Road, Blythewood, SC 29016

On-Site Representatives:

Landmark Construction Thomas & Hutton
Brandon Farrell William Eubank
Buddy Collias Edwin Stadvold
Alpha Corporation Brent Callan
Henry Haas

Permittees:

Richland County Economic Development (SCR10ZEED)
Jeff Ruble, ruble.jeffrey@richlandcountysc.gov
803-576-1368
Scout Motors, Inc. (SCR10ZEW3)
Jessica Siron, Jessica.Siron@scoutmotors.com

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 9:30am 11/19/24; 2:15pm 11/19/24 **Exit Date/Time:** 1:10pm 11/19/24; 5:20pm 11/19/24

NAMES OF STATE INSPECTORS

SC DES: Andrew Knitz, Jonathan Jones, Scott Wills, Conner Green

AREAS EVALUATED DURING INSPECTION (Check those areas evaluated)

X	Permit	X	Self-Compliance Program		Pretreatment
X	Records		Compliance Schedule	X	Pollution Prevention
X	Facility Site Review		Laboratory	X	Storm Water
X	Effluent/ Receiving Waters		Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

INSPECTION SUMMARY

Project is the construction of a vehicle manufacturing facility. Project area is ~1630 acres. The site is permitted under SC's Construction General Permit. Richland County is permitted under SCR10ZEED, and Scout Motors is permitted under SCR10ZEW3 ("Civil Site Improvements for the Scout Motors Facility"). Vertical construction was underway. Phase 2 Mass Grading and Drainage Improvements was the focus of this inspection.

INSPECTOR SIGNATURE

OFFICE/PHONE NUMBER

**CELINA
RUSSO**

Digitally signed by
CELINA RUSSO
Date: 2025.02.11
09:24:20 -05'00'

Celina Russo, Environmental Engineer

USEPA Region 4/ECAD-WEB-WWES
404-562-9804

**JEREMY
JUDD**

Digitally signed by
JEREMY JUDD
Date: 2025.02.11
13:09:19 -05'00'

Jeremy Judd, Environmental Engineer

USEPA Region 4/ECAD-WEB-WWES
404-562-9505

**AHMAD
DROMGOOLE**

Digitally signed by
AHMAD DROMGOOLE
Date: 2025.02.13
13:52:59 -05'00'

Ahmad Dromgoole, Section Chief
Waterways and Wetlands Enforcement Section

USEPA Region 4/ECAD-WEB-WWES
404-562-9212

NPDES Construction Stormwater Worksheet (SC)

1. FACILITY LOCATION INFORMATION					
GPS Coordinates	Latitude	34°12'47.91"N	Longitude	80°59'21.38"W	
Receiving Water(s)	UT of Beasley Creek and Beasley Creek		Weather Conditions	Cool, overcast and light rain	
Total site area acres & disturbed acres	~1630 acres, ~1359 acres disturbed	Construction Start Date	2024 for Phase 2	Construction End Date	TBD
Email on NOI	Ruble.Jeffrey@richlandcountysc.gov	Date of NOI	01/2024	Discharge to 303(d) listed or TMDL waters	N/A

2. STORMWATER POLLUTION PREVENTION PLAN (SWPPP) BASIC INFORMATION			
PLAN TOPICS	YES	NO	N/E
OS-SWPPP created and on site? (C-SWPPP) 3.1.6.A/E	X		
OS-SWPPP contains the same SW management/site plans as C-SWPPP (3.1.1.H)	X		
SWPPP modified or updated to current conditions? (Date?) 3.1.7 <i>C-SWPPP was originally prepared on 11/28/2023 and was modified in 06/2024 and 07/2024.</i>	X		
OS-SWPPP contains all items required in C-SWPPP under Section 3.2 (except for Engineering Reports 3.2.8): 3.1.1.H.IV			
Project Narrative 3.2.1 <i>This project consists of mass grading for the Project Connect site, which will eventually consist of industrial facilities and associated roads and parking areas. Phase 2 of the project encompasses all disturbed areas (~1360 acres). The 360,000 ft² mass graded pad was already installed during previous phase.</i>	X		
Stormwater Management and Sed Control Section: 3.1.1.H.IV/3.2.2			
II. Water Quality BMPs <i>During construction, silt fences, inlet protection, and rock check dams will be installed at the location shown on sheets EC1.1-EC3.18 and kept in functioning order during all construction activities until final stabilization has been reached.</i>	X		
III. Erosion Prevention BMPs <i>Erosion control plans show BMP installation details and locations.</i>	X		
IV. Structural Controls <i>Structural controls include the sediment basins, which will be equipped with skimmers to promote near surface dewatering.</i>	X		
V. Post-Construction Water Quality BMPs <i>Upon final stabilization, four of the ponds will be converted into detention basins prior to terminating CGP permit coverage.</i>	X		
VI. Construction Debris Management	X		
VII. Construction Entrances and Dust Control	X		

<i>Each stabilized entrance should be used in conjunction with the street sweeping measures if track-out becomes apparent. SWPPP recommends a water tanker for spray down during excessive dry/dusty conditions.</i>			
Sequence of Construction (within construction site plans per 3.2.9) 3.2.3 <i>Erosion Control Phase 1B will begin with the installation of 2 temporary ponds for stormwater retention and sediment management. During the construction phase, the mass grading of the site will result in the removal of four temporary sediment basins and the addition of seven temporary basins as the site is brought to finished grade. During the construction phase, ten temporary sediment basins will serve as the primary sediment control BMP.</i>	X		
Maps 3.2.7 Include: topo, soils, floodway, vicinity maps Include: Drainage Maps (for both pre- and post-development) - Direction SW runoff - Contours - Drainage basins of outfalls and BMPs - Outfalls - Receiving waters	X		
Set of Construction Site Plans 3.2.9 <i>An electronic copy of the approved plans with redlines was submitted to inspectors on 11/20/2024 via email. The plans were originally prepared in 06/2023. The most recent revision was in 07/2024 for a major modification submittal and redlines were dated 10/29/2024.</i>	X		
Site Features and Sensitive Areas 3.2.4 USACOE 404 Permits - ID all wotus/receiving water; outline areas of no impact; 3.2.6.A.V for BMP in WOTUS Buffer Zone Management (3.2.4.C) – 30ft; all discharges into buffer should be non-concentrated	X		
C-SWPPP signed and certified by preparer 3.1.3			X

3. SITE DESCRIPTION AND PLAN

Site generally drains towards the southeast corner. Parts of the eastern side are not yet at grade. Parts of the western and northwestern side are being excavated to grade. Site regularly captures aerial images/photos to track and document progress. Scout's vertical construction was underway at the central pad. The storm drainage system for the building had not yet been installed, according to Site personnel. A ditch system was installed around the main pad around August-October 2024 as a modification. This ditch system currently discharges into the "boomerang" pond (Pond #B2), which is controlled by a pump down system. To date, the pond has only been pumped down once following Hurricane Helene. Once Permanent Pond #1 is online, it will receive drainage from the pad and Pond #B2 will be filled in.

Phase 2 of the project includes the disturbance of jurisdictional waters. Beasley Creek will be rerouted into underground pipes near the southeast corner. (Note: compliance with the Site's 404 Permits from USACOE were not evaluated as part of this inspection.) The Creek had not yet been re-routed, as shown in photo DSCN3094. Photo DSCN3098 shows an additional view of Beasley Creek farther upgradient near the temporary stream crossing. Significant sediment deposits were in Beasley Creek and its flood plain at the point where it exited the site limits (photo DSCN3094 and DSCN3095). Site personnel stated that this area is currently scheduled for a natural stream restoration project beginning around February 2025.

Construction sequencing has not been followed. Sediment Basin (SB) #3 is still incomplete and is located where a basin from Phase 1 should have been installed. SB #7 and #10 were not installed at the appropriate time, per the Site's self-inspection reports.

4. RECORD REVIEW			
RECORD REVIEW	YES	NO	N/E
Representative on-site	X		
Submit complete and accurate NOI 2.4.1	X		
Records retained for 3 yrs and readily available 4.2.H/Sec 7	X		
OS-SWPPP must also include the following docs/records 3.1.1.H.V (a) Copy of CGP (b) Copy of NOI (c) NPDES Coverage Approval Letter (d) Local Approvals, when necessary (e) USACOE Approvals (f) Critical Area Permit (Coastal Zone Only) (g) Contractor Certifications	X		
Self Inspection Reports 4.2 <i>Copies of inspection reports were submitted to inspectors via email on 11/20/2024. Thomas & Hutton handles the weekly SWPPP inspections. The most recent inspection was dated 11/15/2024. Concerns noted during this inspection include not following construction sequencing, inadequate BMPs, and pollutants entering waters of the State/US. Corrective actions were identified in these reports, but the date of correction was not filled out.</i> Conducted by qualified personnel? Yes.	X		

5. FIELD EVALUATION & PLAN IMPLEMENTATION		
STRUCTURAL PRACTICES	CHECK BMPS LISTED IN PLAN	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and sediment off site in accordance with the Plan
Silt Fences / Sediment barriers	X	Silt fences are installed around the perimeter. The double-rowed silt fences typically contained an additional layer of mulch, as shown in the silt fences by the rock outfall in photo DSCN3083. J-hooks were installed at multiple locations around the site (see for example on the slope in the background of photo DSCN3065).
Storm Drain Inlet/Outlet Protection	X	N/E

Sediment Basins (SB)	X	<u>SB#3/Permanent Pond #1</u>, located near the western corner, is currently under construction and therefore is not currently discharging. See photo DSCN3059. As shown in photo DSCN3060, there is currently a diversion around the western side which drains into temporary basin (SB#13). The basin's future outlet control structure is shown in photos DSCN3064. A rock apron will be installed around the downstream outlet. <u>Wet Pond #2</u> (see photos DSCN3109-3111) is done except for topsoiling and seeding. The nearby temporary basin will be removed within the next few weeks once Pond #2 is online. The area below the outfall was not yet stabilized and sediment had accumulated in the conveyance. <u>Temporary SB #4</u> is shown in photos DSCN3061-3062. Redlines (dated October 29) on page EC1.9 of the Plans call for turbidity curtains. However, the pond has since been shortened. The forebay berm is a remnant from when the pond was about three times larger. Pond is controlled by three skimmers which are piped under the access road and discharge at the location shown in photo DSCN3063. Photo DSCN3065 shows the rock berm installed across the outlet. Photo DSCN3066 shows sediment deposits observed below the outfall from previous discharges. The current configuration was installed following SCDES inspections so as to remove the access road incorrectly constructed in the emergency spillway. <u>Connect Phase 1 MG Mod Temporary SB #6</u> is shown in photo DSCN3103. Large rills had formed on the slope of SB#6 below the silt fences. Basin was enlarged with additional baffles, consistent with redlines. <u>Connect Phase 1 MG Mod Temporary SB #7</u> is shown in photo DSCN3088. Skimmer was discharging (photo DSCN3089) during the inspection. Slopes were largely stabilized with vegetation, except for where rills had formed on the slope opposite the skimmer. Baffles were installed consistent with Initial Phase EC Plans. Rock sediment dike may need a refresh. Flow from these two ponds (see photo DSCN3093) comingle and discharge through the same rock outfall (photo DSCN3090) in the Site's southwestern corner. The conveyance beyond the outfall is shown in photo DSCN3091. <u>Temporary SB #10</u>, which is shown in photo DSCN3114, was installed for additional sediment storage. Pond slopes were stabilized. Pond is controlled by two skimmers <u>Temporary SB #11</u> is shown in photo DSCN3099. The outfall of this pond is shown in photo DSCN3100. <u>Wet Pond #3</u> is currently under construction and outlet pipe is currently being laid (photo DSCN3067). The outfall below this location, which has a history of blowouts, was discharging turbid water. The location of <u>Wet Pond #4</u> is shown in photos DSCN3107-3108. Diversions will not be rerouted into this pond until after the area is at grade. <u>Temporary SB #5</u> is controlled by two skimmers (photo DSCN3105) which discharge at the location shown in photo DSCN3104. This pond will eventually either be shortened or decommissioned entirely. Pond currently has forebay berm, baffles, and rock berm consistent with the Plans. Rock berm may need refresh/de-mucking soon. <u>Temporary SB #6</u>, which is adjacent to SB #5, is shown in photo DSCN3103. <u>Pond B2</u> (aka "boomerang pond") was installed circa August-October as part of a permit major modification. This pond receives discharge from the drainage system around the pad and is controlled by a pump-down system. Pond slopes were stabilized, but some rills had formed in the pad ditch system itself.
Check Dams	X	N/E

Drainage Swales / Conveyances	X	Multiple swales and diversions on site. See for example photo DSCN3106
STABILIZATION PRACTICES		
Seeding, Mulching, Vegetation, Matting, Sodding, Geotextiles	X	Photo DSCN3102 shows the southeastern slopes of the main pad, which were retracked following last week's rain and are awaiting stabilization. DSCN3081 shows the western pad slopes that were stabilized with vegetation, staked wattles, and slope drains. DSCN3087 shows an additional view of the pad slopes, where some rills had started forming. Photo DSCN3121 shows an overview of the area behind the maintenance pad, which needed stabilization. The site previously (~2 months ago) had issues with armyworms in this area. Rills had formed alongside the access road driveway at the location shown in photo DSCN3122. Rills had also formed on the slope shown in photo DSCN3117, located near the toe of Temporary Pond #10.
OTHER BMP CONTROLS		
Construction Entrance & Exit Controls	X	N/E
Truck Wash Down Controls	X	To reduce traffic on site, equipment operators ride shuttles from the employee parking lot.
Concrete truck washout pit	X	N/E
Other Practices (e.g., fueling containment, proper storage of debris & chemicals)	X	Equipment is organized by manufacturer (spaces for John Deere, Volvo, etc.) on the maintenance pad on the east side. Representatives from each manufacturer come onsite to service vehicles.

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

OUTFALL, STORMWATER, DISCHARGE, & RECEIVING WATER	YES	NO	DESCRIPTION
Number & location of stormwater discharge(s)/outfall(s) consistent with the Plan	X		Several rock outfalls were installed along the perimeter, in accordance with the Plans. See for example photos DSCN3080, 3083, 3085. Sediment basin outlets were controlled by skimmers. Basin outlets, such as those of <u>Connect Phase 1 MG Mod Temporary SBs #6 and #7, discharge to a riprap apron before discharging through a rock outfall.</u>

Evidence of off-site accumulation of sediment observed in receiving water	X		Current BMPs are not adequately preventing sediment from discharging to Beasley Creek. Photo DSCN3098 shows the sedimentation of Beasley Creek onsite near a temporary stream crossing. Photos DSCN3094-3095 shows photos of Beasley Creek where it leaves the Site boundaries near the southeast corner. Upstream locations of Beasley Creek are shown in photos DSCN3112-3113, the creek runs on Site from the roadway. Photos DSCN3019-3120 show Beasley Creek farther upstream, behind the maintenance pad. Photo DSCN3066 shows the accumulation of sediment from previous discharges below the outfall of Temporary Sediment Basin #4 and beyond the limits of disturbance. Sediment was discharging from the rock outfall shown in photo DSCN3069. Sediment had accumulated along the banks of the stream, as shown in photo DSCN3075. A sediment plume from this conveyance was observed at the confluence shown in photo DSCN3076. Photo DSCN3080 shows sediment transport beyond the rock outfall. Photo DSCN3116 shows sediment accumulation beyond the rock outfall.
Non-stormwater discharge observed		X	None observed.

Exit interview conducted with: Landmark Construction: Brandon Farrell (Senior Project Manager), Thomas & Hutton: William Eubank, Edwin Stadsvold, Brent Callan

Preliminary findings discussed during the exit interview included:

Report will be sent to email address on the NOI in about 60 days. Thomas & Hutton will email copies of the Plans and last 6 months of SWPPP inspections to inspectors.

Photo Log is attached.