

REPORT OF COMPLIANCE EVALUATION INSPECTION

AT

Greene County - Kansas Expressway Extension Phase 2
Right of Way Corridor from Plainview Road to Farm Road 190
Springfield, Missouri, 65810
Greene County

NPDES Permit # MOR100040

ON

August 12 and 13, 2024

BY

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

INTRODUCTION

I conducted a Compliance Evaluation Inspection (CEI) of the Greene County Commission construction stormwater site, Kansas Expressway Extension Phase 2, in Springfield, Missouri from August 12, 2024 to August 13, 2024. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended. This narrative report and attachments present the findings and observations made during the inspection.

PARTICIPANTS

Greene County, Resource Management Department:

Tim Davis, Environmental Division, Environmental Compliance Manager

cell: 417-834-3015

e-mail: tdavis@greenecountymo.gov

Kelly Short, Environmental Division, Stormwater Engineer

office: 417-868-4147

e-mail: krichner@greenecountymo.gov

Kyle Richner, Environmental Division, Water Quality Specialist

office: 417-868-4147

e-mail: krichner@greenecountymo.gov

Greene County, Highway Department:

Jim Francka, Construction Inspector Supervisor

cell: 417-818-1469

e-mail: jfrancka@greenecountymo.gov

Missouri Department of Natural Resources (MoDNR):

David Halbrook, Southwest Regional Office, Environmental Specialist

office: 417-891-4300

e-mail: david.halbrook@dnr.mo.gov

U.S. Environmental Protection Agency (EPA):
Suzanne Ward, Physical Scientist
office: 913-551-7251
e-mail: ward.suzanne@epa.gov

INSPECTION PROCEDURES

On Monday, August 12, 2024, I conducted visual reconnaissance at the Kansas Expressway Extension Phase 2 construction site from Plainview Road looking south and West Gaslight Drive looking west to identify any areas of concern visible from the public right-of-way (Photos 2-7). Following reconnaissance, I contacted the Greene County Resource Management Department to schedule an inspection the same day. I spoke with Kyle Richner, Water Quality Specialist, and he agreed.

I met with Kelly Short and Kyle Richner of the Greene County Resource Management Department, Environmental Division, and Jim Francka of the Greene County Highway Department. I was accompanied by David Halbrook of the MoDNR Southwest Regional Office. I started the entry briefing conference with introductions and I presented my EPA credentials. I explained that the purpose of the inspection was to evaluate the facility's compliance status with the Clean Water Act (CWA) and Missouri State Operating Permit requirements under the authority of Section 308(a) of the Federal Water Pollution Control Act. I explained that the scope of the inspection would include a records review and visual inspection of the construction site, which would include the collection of photographs and documents. I provided Kelly Short with a printed copy of the U.S. EPA Notice Regarding Propriety/Confidential Business Information (CBI) Information Sheet and Form. I made Mr. Short aware of the County's confidentiality rights and informed him that they had 10 business days to return the form signed if they needed to make any claims. He did not raise CBI claims during the inspection. Mr. Francka, the Construction Inspector Supervisor, provided most information pertaining to the site's operation.

On Tuesday, August 13, 2024, I returned to the site to observe the outfalls following a rain event and met with Tim Davis, Kelly Short, and Jim Francka. I was accompanied by David Halbrook

I took 78 photographs during the visual inspection. Visual images of 62 photographs are displayed in Attachment 1 – Photographs. Descriptions of all photos taken are in Attachment 2 – Photo Log. I received electronic documents for review following the on-site inspection.

FACILITY DESCRIPTION

NPDES permit. This 22-acre project is for construction of an urban primary artery roadway with two travel lanes in each direction separated by a grass median, which extends the Kansas Expressway from Plainview Road to Farm Road 190. The Missouri State Operating Permit, MOR100040 (Attachment 4) lists the Greene County Commission as the owner. This project is contracted by the Greene County Highway Department. Greene County Resource Management Department provides compliance support. Both the Highway Department and Resource Management Department are under the authority of the Commission.

The permit was last issued on July 5, 2022, and expires on July 4, 2027. The MOR100 general permit provides coverage of multiple projects for any land disturbing work in the entire county.

Each individual construction site must be reported to MoDNR and have a SWPPP developed. The permit sets forth requirements and conditions that the permittee is to follow for each site.

Location. This construction site is located in unincorporated portions of Greene County south of Springfield, Missouri. The disturbed area is the right of way corridor from Plainview Road to Farm Road 190, as provided in quarterly reports. The site is approximately 1.1 miles long. Based on site observations and analysis of aerial imagery from August 3, 2024, the disturbed area ranges from approximately 150 feet wide to 350 feet wide and a total of 28.7 acres. See Image 2 for aerial imagery of the disturbed area.

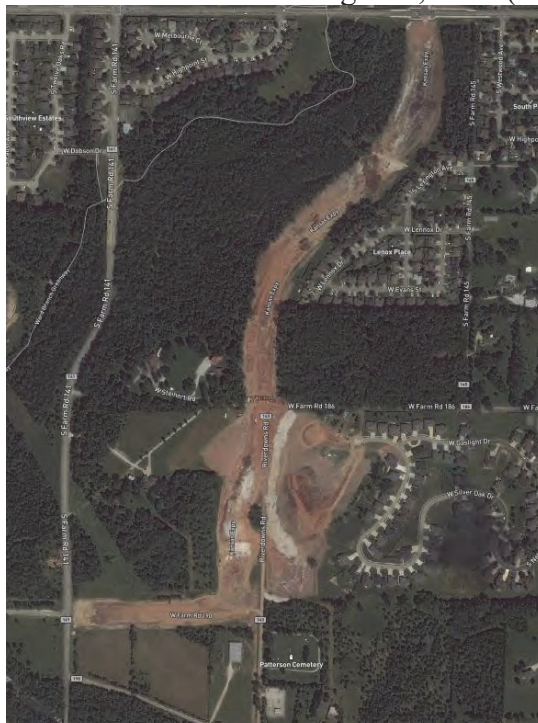
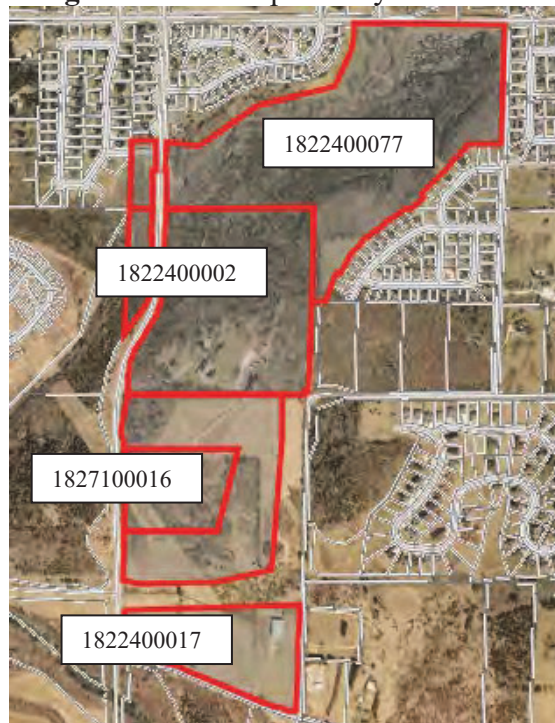
The legal description provided is Section 22, Township 28N, Range 22 W and Section 27, Township 28 N, Range 22 W. The construction site is bordered on the north by West Farm Road 182/Plainview Road. The east side is bordered by South Fork Subdivision in the north portion, private property in the middle portion, and an active construction stormwater site, Lions Gate Phase V permitted under MORA26033, in the south portion. Along the southern boundary, the site is bordered by West Farm Road 190. To the west the site is bordered by South Farm Road 141/Cox Avenue. The site is located on portions of four parcels owned by Greene County as listed below in Table 1 and as seen in Image 1.

Table 1 Greene County-owned properties

Parcel ID	Property Address
1822400077	W Plainview Rd
1822400002	5780 S Farm Road 141
1827100017	1941 W Farm Road 190
1827100016	5908 S Farm Road 141

Image 1. Greene County-owned properties

Image 2. Kansas Expressway Extension Phase 2 disturbed area on August 3, 2024 (G-EDG)



Lions Gate V. The Greene County Kansas Expressway Extension Phase 2 project is adjacent and overlapping with the Lions Gate V construction stormwater site. Each construction site is covered by their own Missouri State Operating Permit for land disturbing activity. Lions Gate activity began in June 2024, while Kansas Expressway began in January 2024. Emery, Sapp and Sons (ESS) was contracted by both Greene County Highway Department and the Lions Gate Developer and is simultaneously conducting mass grading on both projects. During the inspection, a representative of ESS shared the Lions Gate V construction plans to demonstrate the boundaries of that project (Photo 21).

Outfalls. Stormwater from the site currently discharges from five (5) outfalls. In future phases of construction, it will discharge from seven (7) outfalls. See locations in Attachment 3 – Aerial Map. On-site personnel refer to each outfall by the station location from construction plans (Attachment 7). The SWPPP (Attachment 6) lists the corresponding outfall and station name. See Table 2 below for a summary of information from the SWPPP and Construction Plans. Outfall 4 moved locations once construction commenced on the adjacent project, Lions Gate V. Outfalls 5 and 6 will become active during future phases of construction.

Table 2. Outfalls with station number and construction plan page

Outfall	Station #	Page #	Description
1	STA 103+00	C031	Existing road ditch discharges to Ward Branch
2	STA 113+00	C032	Natural valley draining to small existing dry pond that discharges to Ward Branch
3	STA 123+00	C032	Existing broad shallow valley
4	STA 136+50	C033	Natural valley discharging south of Farm Road 186
5	STA 21+00	C038	No description provided
6	STA 21+00	C038	No description provided
7	STA 33+50	C040	Existing road ditch discharges to the James River

Receiving Water. The site is located in the Ward Branch-James River Watershed (HUC 110100020304). Stormwater from the northern portion of the site discharges to Ward Branch from Outfalls 1, 2, and 3. Stormwater from the southern portion of the site discharges to the James River from Outfalls 4, 5, 6, and 7. Missouri Department of Natural Resources (MoDNR) designated uses for Ward Branch include warm water habitat, irrigation, livestock and wildlife protection, secondary contact recreation, whole body contact – B, and human health protection. Ward Branch is a classified P stream that maintains permanent flow even in drought periods and is also identified as a losing stream. MoDNR designated uses for the James River, a classified P stream, in this reach include warm water habitat, cool water habitat, irrigation, livestock and wildlife protection, secondary contact recreation, whole body contact – A, and human health protection. There are no known impairments to the designated uses in either receiving stream.

Compliance history. Kansas Expressway Extension Phase 2 has not previously been inspected by MoDNR or the USEPA.

FINDINGS AND OBSERVATIONS

Records Review

I reviewed documents provided by Greene County, MoDNR, and publicly available documents I obtained online in order to determine compliance. On August 13, 2024, I emailed Tim Davis to

request the site SWPPP, SWPPP map, site inspections, and the Army Corp of Engineers 404 determination for the filled area. On August 14, 2024, Mr. Davis sent the SWPPP (Attachment 6), construction plans (Attachment 7), and 404 Nationwide Permit Number SWL-2019-00032 (Attachment 8) electronically. On August 20, 2024, Mr. Francka sent the Self-Inspection Forms (Attachment 9) electronically. MoDNR provided the Missouri State Operating Permit (Attachment 4), 2022 permit application (Attachment 5), and quarterly reports (Attachment 11) submitted by the County. I reviewed the 2017 Environmental Assessment including the Wetlands Study and Geological Study from the Greene County website (Attachment 14, 15).

Stormwater Pollution Prevention Plan (SWPPP). Permit condition IV.1. requires a SWPPP to be developed prior to land disturbing activities. I reviewed the SWPPP written on December 22, 2023, by Klay Camden of Emery Sapp & Sons. Mr. Davis says the SWPPP was developed in combination between ESS, the Highway Department, and the Resource Management Department. Clearing and grubbing on the Kansas Expressway site began the week of January 30, 2024.

Permit condition IV.7. requires the SWPPP to contain a legible site map(s) which includes certain features listed below. Mr. Davis provided Construction Plans (149 pages) created by Burns & McDonnell and Hg Consult Inc., which are referenced in the SWPPP. The Construction Plans include 20 pages of maps (C017-C025, C029, C031-C040) each page depicting an individual section of the site in detail. There was no map depicting the overall layout of the full site and many features required by the permit were not included (**Finding 1**). See below.

- The boundaries of property are not included.
- The locations of all waters of the state within the site and half mile downstream are not included.
- The locations of all outfalls are included in the detailed sections, although there is no general map of the site depicting location of outfalls in relation to the overall site. See Table 2 for the page of the Construction Plan each outfall is depicted on with a summary from SWPPP Section 1.1 Discharge Information.
- Direction of stormwater flow using arrows is not included.
- The approximate slopes before and after grading are included.
- The detailed sections depict areas of soil disturbance, but it is unclear which areas were to be left undisturbed.
- Locations of sediment traps, inlet and ditch checks, mulch berms, silt socks, and erosion control blankets are included, but natural buffers are not included.
- The detailed sections depict locations where erosion control blankets are to be installed.
- The locations of material, waste, borrow, or equipment storage areas and stockpiles are not included.
- Locations of designated exits are not included.
- Locations of stormwater inlets and conveyances are included.

Site inspections. Permit condition IV.11. requires inspections to be conducted on a regular basis. Staff utilize SWPPP Appendix E, Self-Inspection Form, to document visual inspections. I reviewed Self-Inspection Forms (Attachment 9) for inspections conducted between January 29, 2024, and August 12, 2024.

The SWPPP indicates inspections will be done at least once every 7 calendar days and within 48 hours after a 2-year, 24-hour storm or within 72 hours if the rain event ceases on a non-workday in accordance with the permit. The SWPPP identifies 3.90 inches as the 2-year, 24-hour storm. The National Oceanic and Atmospheric Administration (NOAA) Atlas 14 Point Precipitation Frequency Estimate¹ tool shows the 2-year, 24-hour storm for the Springfield Regional Airport to be 3.62 inches (Attachment 11). I reviewed weather data for Springfield Airport from NOAA Climate Data Online (Attachment 12). There were no instances of precipitation at or above 3.62 inches from January 1, 2024, to August 13, 2024. There were six (6) instances when inspections were not conducted within 7 calendar days of the previous inspection (**Finding 2**). See Attachment 11 – Self-Inspection Form summary for specific occurrences.

Permit condition IV.10. requires inspection of all BMPs including perimeter BMPs, stabilized areas, material/waste/borrow/equipment storage areas, stormwater flow, outfalls, and receiving streams. The Self-Inspection Form contains sections to inspect the SWPPP, construction exits, stockpiles, dewatering, housekeeping, BMP maintenance, trees, stabilization, outfalls, and receiving streams.

Permit condition IV.12. requires inspection reports to include the name and title of inspector, date/time of inspection, observations relative to the effectiveness of BMPs, any corrective actions taken, and areas where construction has ceased. All Self-Inspection Forms include the name of the inspector, although the name on August 9 and 12, 2024 is illegible. The title of the inspector is not included on any of the forms (**Finding 3**). The “Grading and Stabilization Log” section of the Self-Inspection Form provides an area to discuss stabilization in areas where construction has ceased, although it was not filled out for any of the inspections reviewed.

Permit condition IV.13. requires deficiencies to be documented and corrected as soon as possible or within seven (7) days. Self-Inspection Forms documented deficiencies such as general deficiencies, murky/tinted water, silt accumulation, and mulch berms not filtering. Four (4) times deficiencies were observed, but a corrective action was not documented (**Finding 4**). See Attachment 11 – Self-Inspection Form Summary for specific dates.

Permit condition IV.9. requires the SWPPP to be updated in certain circumstances required by the permit. “New amendment detail added to SWPPP” was indicated in the Self-Inspection Form for inspections conducted on February 26 and March 4. Additionally, new BMPs were added on May 6 and May 14. The SWPPP has not been amended (**Finding 5**).

Permit condition IV.8. requires a knowledgeable person to be designated as the environmental lead and as the inspector. SWPPP Section 2.2 Notification & Certification designates Doug Eyman, Greene County Highway Department, as the environmental lead and person to conduct inspections. Tim Davis, Environmental Compliance Manager, is the Greene County Resource Management Department compliance lead. The Self-Inspection Forms indicate Casey Gibbs, Site Superintendent with Emery Sapp & Sons, is conducting the site inspections (**Finding 6**). I was not provided Mr. Gibbs qualifications regarding erosion, sediment, and stormwater control

¹ Part VI – Rainfall Values for Missouri & Surface Water Buffer Zones of Missouri State Operating Permit MOR100 Fact Sheet, site-specific 2-year, 24-hour storm event information, NOAA Atlas 14 https://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html

principles. Additionally, there is no record of training in SWPPP Section 3 Training, Inspection and Corrective Action for any individuals.

Reporting. Permit condition VII.3. requires submission of quarterly reports which include a list of active land disturbing projects. I reviewed quarterly reports for 2024 quarters 1 and 2 (Attachment 10). The quarterly reports included all information required by the permit except the percent completion of the project.

404 permits. The permit does not allow placement of fill material into a wetland unless the appropriate CWA Section 404 permitting authority provides approval for such actions or determines actions are exempt. An application for a 404 permit was submitted to the U.S. Army Corp of Engineers in 2019. The USACE Little Rock District evaluated the entire Kansas Extension project, Phase 1 and Phase 2. They issued Nationwide Permit Number SWL-2019-00032 with the determination valid until March 18, 2022. The USACE permit identified three road crossings in waters of the United States consisting of proposed new structures in two streams and construction of the road base in a spring-fed wetland area. The stream crossings were part of Phase 1 construction. The construction of the road base in a spring-fed wetland area is part of Phase 2 construction, which this inspection report addresses. The cover sheet indicates “Construction of the roadway embankment along the edge of an existing wetland area would require fill placement in 0.04 acres of palustrine forested wetlands. The crossing would include installation of a spring box and culvert to protect the spring outlet and maintain flows beyond the limits of the fill slope.” Mr. Davis said it was determined that installation of a conveyance and spring box is not appropriate. See the Outfall 2 description in the **Visual Inspection** portion of this Inspection Report for additional details.

Permit condition IV.3. requires the SWPPP to discuss if a 404 permit is necessary. SWPPP section 4.2 Natural Buffers discusses buffers and 404 permits. The SWPPP indicates that there is a small manmade pond at Outfall 2 but does not discuss the spring-fed palustrine forested wetland area identified in the USACE determination and Wetland Study in the 2017 Environmental Assessment (Attachment 14, 15). Additionally, SWPPP Appendix A: USACE CWA Section 404 Permit Cover Page states “Not applicable for Phase 2” (**Finding 7**).

Visual Inspection

Day 1

General. On the first day of the inspection, August 12, 2024, the temperature was approximately 80°F with no precipitation. The Springfield-area had not received precipitation during the week prior to the inspection. I conducted visual inspections to evaluate compliance in the disturbed area, downgradient boundaries, ingress/egress points, material/waste/borrow/equipment storage areas including the fueling station, Outfalls 1, 2, 3, 4, and 7, and Ward Branch at Plainview Road and at the Ward Branch Greenway trail under the Farm Road 141 bridge. The James River was inaccessible due to dense vegetation and poor view from the Farm Road 141 bridge. See Attachment 3 for a site map with outfalls, boundaries, and other features.

Permit condition III.1. requires the permittee to post a public notification sign with the permit number. A board is located at the north terminus of the construction site along Plainview Road to post required documents, but the MoDNR permit sign was not posted (Photo 50) (**Finding 8**).

A job trailer is located on the west side of the site near former Farm Road 186. A copy of the SWPPP and the handwritten site inspections are kept on-site in the job trailer (Photo 9). The site map available in the job trailer depicts the areas to be cut or filled, but outfalls, ingress/egress, and BMP locations are not marked (Photo 8).

A topsoil stockpile was located to the south of the job trailer. Permit condition V.9. requires stabilization and diversion of surface flows around stockpiles to prevent erosion. The stockpile was located on a slope, but BMPs had not been used to divert surface flows and temporary stabilization had not been installed (Photo 13) (**Finding 9**).

Permit condition III.9. requires good housekeeping and providing waste management practices. A storage container, dumpster, and portable toilets are provided on site to manage waste (Photo 10, 12). I observed what initially appeared to be lead acid batteries stored outdoors and surrounded by tall vegetation just downhill of the job trailer (Photo 11). Mr. Francka said they are actually rock trencher bits that need to be recycled. I observed approximately one dozen scrap tires near the topsoil stockpile (Photo 13). Facility representatives were unsure if the tires were generated on site or if they were waste found during construction.

Permit condition III.10. requires fueling facilities to adhere to applicable federal and state regulations. Permit condition III.12. requires storage of petroleum products so they prevent commingling of stormwater with container contents and requires spill prevention, control, and countermeasures. A fuel tank was located on site for fleet fueling (Photo 14). The fuel tank was placed in a round poly stock tank/waterer with a drain plug as secondary containment. I observed standing water with apparent sheen in the secondary containment (Photo 15) and wet soil below the drain plug (Photo 16) (**Finding 10**). The volume of the fuel tank and poly stock tank were not provided and are not included in the SWPPP.

Boundaries, Outfalls. At the time of the inspection, mass grading was occurring in the southern portion of site, south of Farm Road 186 (Photos 36, 37, 55). I did not observe active work north of Farm Road 186, but Mr. Davis said there is still active construction (Photo 40). I visually inspected downgradient project boundaries. Permit conditions III.5. and V.6. require installation of erosion and sediment control BMPs along downgradient project boundaries. Mulch berms are utilized (Photos 26, 32, 33, 34).

Outfall 1 is located at the north terminus of the site at Plainview Road on the west side of the construction site. I visually inspected Outfall 1, the new stormwater conveyance, and BMPs. The new stormwater conveyance at Outfall 1 conveys off-site, upgradient flow from the existing roadside ditch along Plainview Road, under the construction site, then to the roadside ditch that discharges to Ward Branch (Photos 52, 53). BMPs at Outfall 1 include a rip rap berm followed by compost filter socks (Photo 54). The SWPPP indicates a sediment trap will be utilized at Outfall 1, but they were unable to install a sediment trap due to location of underground utilities. The SWPPP was not updated (**Finding 5**). Permit condition V.12. requires temporary or final stabilization to be initiated immediately in inactive areas of the site. Stabilization has not been installed in the inactive areas around Outfall 1 (Photo 55) (**Finding 11**).

I visually inspected Outfalls 2 and 3. Both outfalls are at the toes of a slope in their respective drainage areas. Stabilization had not been installed, but Mr. Davis said grading was still being completed around both outfalls (Photos 41, 48, 56, 60). Outfall 2 discharges to an area with a

former pond and wetland (Photos 57, 58). The area was identified as a spring-fed palustrine forested wetland in the Wetland Study of the 2017 Environmental Assessment (Attachment 14, 15) and USACE 404 determination (Attachment 8). Permit condition V.4. requires the selection of appropriate BMPs for the site which considers stormwater volume and velocity. I observed washed out mulch berms at Outfall 2 (Photos 61, 62). Riprap was added in front of the berms (Photo 56, 59). I also observed washed-out mulch berms and sediment transported over mulch berms at Outfall 3 with no change to the BMP (Photos 41-44). Appropriate BMPs have not been installed (**Finding 12**).

I visually inspected an area filled with gravel which extends south from Farm Road 186 on the east side of the Kansas Expressway project. The filled area is the approximate boundary separating the Kansas Expressway from Lions Gate V (Photo 22, 23). Outfall 4 was originally located in this area prior to fill. Mr. Davis said Outfall 4 was now considered to be at the sediment trap further south installed on the Lions Gate V site (Photos 28, 29, 70). The SWPPP and maps were not updated with the new location (**Finding 5**).

Along the same eastern project boundary, facility representatives identified a sinkhole. A mulch berm was installed along the west side of the sinkhole area since the buffer area around the sinkhole forms part of the eastern project boundary (Photos 25, 26). The sinkhole was not referenced in the “Sensitive Water Resources” portion of the SWPPP.

I visually inspected the area where Outfalls 5 and 6 will be located in future phases of construction. Mr. Davis said these outfalls won’t be active until stormwater infrastructure is completed. These outfalls will be located on the east and west sides of Former Farm Road 143, which provides a boundary between Kansas Expressway and Lions Gate V (Photo 27).

Outfall 7 is located at the southwest terminus of the site with Farm Road 141. I visually inspected Outfall 7 and the sediment trap (Photos 64, 65, 66). The area was heavily vegetated, which obscured my view, but I did not observe sediment downgradient of the trap.

Day 2.

On the second day of the inspection, August 13, 2024, I arrived at approximately 2:00 p.m. I returned to the site to evaluate the outfalls following precipitation. According to the Springfield Branson National Airport Station, the Springfield-area received 2.6 inches of rain between 9:52 a.m. and 12:52 pm.

I visually inspected the sediment trap at Outfall 7 and did not observe sediment discharges (Photo 68). I visually inspected Ward Branch downgradient of Outfall 1 from the Plainview Road bridge (Photo 76, 77). I did not observe any discharge of sediments from Outfall 1 or in Ward Branch. I visually inspected Ward Branch downstream of the construction site along the Ward Branch Greenway under the Farm Road 141 bridge (Photo 78). I observed small standing pools, but no surface flow at this location, which is approximately 0.5 miles downstream from the Plainview Road bridge where I observed visible flow. Ward Branch is identified as losing stream on the MoDNR MAPiT² tool.

² <https://modnr.maps.arcgis.com/apps/webappviewer/index.html?id=87ebef4af15d438ca658ce0b2bbc862e>

I visually inspected Farm Road 143 at the ingress/egress point. Permit condition III.7. requires minimization of sediment track out from the site and sediment transport onto roadways by using appropriate stabilization techniques or BMPs at all points that exit onto paved roads or areas outside of the site. I observed sediment track out from the construction site onto Farm Road 143 (Photo 69, 75) (**Finding 13**). There is a gravel ingress/egress from the construction site. This ingress/egress was not marked on a site map and did not include appropriate BMPs to control and/or minimize track out. Mr. Davis said there was previously a stabilized gravel exit, but it was removed when sanitary sewer lines were installed and had not been replaced. ESS is responsible for street sweeping any track out.

I visually inspected existing stormwater infrastructure downgradient of the site on Farm Road 143 in front of Patterson Cemetery. Mr. Davis said this receives flow from Outfall 4. I observed transported sediment and turbid water in the existing stormwater infrastructure (Photos 71-74). Permit condition III.3. requires the design and installation of effective erosion and sediment control to minimize the discharge of pollutants. Permit condition V.3. requires the permittee to replace or add more effective BMPs when a BMP (Outfall 4 sediment trap) has demonstrated ineffectiveness in preventing or minimizing sediment from leaving the site.

SUMMARY

A Notice of Preliminary Findings was not provided during the closing conference of the inspection; however, findings of potential areas of concern are noted below:

Finding 1 – SWPPP site map did not include all permit requirements including the project boundaries, locations of all waters of the state within a half mile downstream, direction of stormwater flow using arrows, depiction of areas left to be undisturbed, locations of natural buffers, locations of material, waste, borrow, and equipment storage, and locations of designated exits.

Finding 2 – There were six (6) instances when site inspections were not conducted within seven (7) calendar days of the previous inspection.

Finding 3 – Self-Inspection Forms did not include the title of the inspector and the name of the inspector on August 9 and August 12, 2024, is illegible.

Finding 4 – Deficiencies were noted during four (4) site inspections on May 28, June 10, July 5, and July 18, 2024, but corrective actions were not documented.

Finding 5 – The site inspection noted the SWPPP needed to be amended on February 26 and March 4, 2024. New BMPs were added on May 6 and May 14, 2024. A rock berm was utilized at Outfall 1 instead of a sediment trap as indicated in the SWPPP. Outfall 4 was moved from location in original SWPPP and maps. The SWPPP was not amended.

Finding 6 – The inspector designated in the SWPPP did not conduct the site inspections.

Finding 7 – The SWPPP did not discuss 404 Nationwide Permit SWL-2019-00032 and the associated wetland.

Finding 8 – The public notification sign from the Missouri State Operating Permit with the permit number was not posted.

Finding 9 – Stabilization and diversion of surface water flows were not installed around the stockpile.

Finding 10 – The fuel tank was stored in a poly stock tank/waterer, which contained water with a sheen, and wet soil beneath the drain plug.

Finding 11 – Stabilization was not installed in the inactive areas around Outfall 1.

Finding 12 – Appropriate BMPs which consider stormwater volume and velocity were not selected at Outfall 2 and Outfall 3.

Finding 13 – Sediment track out and transport was not minimized on Farm Road 143.

SUZANNE WARD Digitally signed by
SUZANNE WARD
Date: 2024.09.25
16:40:29 -05'00'

Suzanne Ward
Physical Scientist

NICOLE MORAN Digitally signed by
NICOLE MORAN
Date: 2024.09.27
14:11:01 -05'00'

Nicole Moran
Section Chief

APPENDICES:

- Attachment 1 – Photographs (21 pages)
- Attachment 2 – Photo Log (3 pages)
- Attachment 3 – Aerial Map (1 page)
- Attachment 4 – Missouri State Operating Permit MOR100040 (33 pages)
- Attachment 5 – Permit Renewal Application 2023 (2 pages)
- Attachment 6 – SWPPP (104 pages)
- Attachment 7 – Construction Plans (149 pages)
- Attachment 8 – 404 Nationwide Permit SWL-2019-00032 (28 pages)
- Attachment 9 – Self-Inspection Forms (68 pages)
- Attachment 10 – Self-Inspection Form summary (1 page)
- Attachment 11 – 2024 Quarterly Reports (5 pages)
- Attachment 12 – NOAA Atlas 14, Springfield, Missouri (4 pages)
- Attachment 13 – Springfield Airport weather data (5 pages)
- Attachment 14 – 2017 Environmental Assessment (140 pages)
- Attachment 15 – 2017 Environmental Assessment Appendices (467 pages)