EPA United States Environmental Protection Agency

Region 10 Enforcement and Compliance Assurance Division
1200 6th Avenue
Seattle, WA 98101

INSPECTION REPORT

Inspection Date:	02/25/2021	
Time:	**Entry:** 1:30 p.m.	**Exit:** 2:45 p.m.
Media:	Water	
Regulatory Program:	CWA NPDES/Construction Stormwater	
Operator Name(s):	Toll Brothers, Inc.– (Notice of Intent IDR1000SM)	
Operator Addresses:	3103 West Sheryl Drive	
Operator City, State, Zip Code:	Meridian, Idaho 83642	
Site Name:	Sterling Ranch	
Site Physical Location:	East Deer Flat Road, Kuna, Idaho, approximately 12 miles southwest of Boise, Idaho,	
	Latitude/Longitude	43.5056°N, 116.4°W
City, State, Zip Code:	Kuna, Idaho, 83634	
Site Contact(s):	Brett Calhoun, Stormwater Compliance Inspector Phone: (408) 603-4889 Email: jcalhoun@tollbrothers.com	Toll Brothers, Inc.
County:	Ada County, Idaho	
Site Identifier:	Sterling Ranch	
Estimated Site Area to be Disturbed:	115 acres	
Site Receiving Water(s)	Kuna Canal	
Site Receiving Water(s) Description:	Irrigation Canal	
NPDES Permit:	2017 EPA Construction General Permit (CGP)	
EPA Site Tracking Numbers:	IDR1000SM	
Notice of Intent (NOI) Site Timeline(s):	**Start Date:** 11/16/2017	**End Date:** 12/31/2021
Inspector(s):		
Steven Chase – PG Environmental	U.S. EPA Contract Inspector (Lead Inspector)	(720) 789-8048
Signature:		**Date:** 04/26/2021
Kelly Davis – PG Environmental	ERG, Inc. Staff	(703) 633-1600

EPA Region 10 Recipient: Brian Levo		
Signature: BRIAN LEVO	Digitally signed by BRIAN LEVO Date: 2021.04.27 10:08:20 -07'00'	**Date:**

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Section I – Inspection Information

Purpose and Scope of the Inspection

On February 25, 2021, Steven Chase, U.S. Environmental Protection Agency (EPA) Contract Inspector, and Eastern Research Group (ERG), Inc. staff inspector Kelly Davis, (hereafter, we or Inspection Team) conducted a construction stormwater inspection of the Sterling Ranch construction project (hereafter, Site) operated by Toll Brothers, Inc. (the Permittee). The purpose of the inspection was to determine compliance with the requirements of EPA's National Pollutant Discharge Elimination System (NPDES) 2017 General Permit for Discharges of Stormwater Associated with Construction Activities (the Permit). The inspection consisted of two parts, a preliminary records review and a Site walk-through. Inspection photographs from the Site walk-through are included in Attachment A and photographs from the onsite records review are included in Attachment B. The Inspection Team requested a digital copy of the files reviewed during the inspection and performed a more thorough review after the onsite inspection. Inspection reports provided by the Permittee are included as Attachment C and the Site's Stormwater Pollution Prevention Plan (SWPPP) is included as Attachment D.

Opening Conference

A notice of inspection was attempted via phone call to the Site Contact, Mr. Don Reynolds at approximately 5:00 p.m. on the day prior to inspection without success. The Inspection Team subsequently contacted Mr. Brett Calhoun of Toll Brothers, Inc. on the same evening at approximately 5:30 p.m. and agreed to meet on site at 1:30 p.m. on February 25, 2021. We arrived at the Site at the scheduled time and met Mr. Calhoun at the northern end of North Hose Gulch Avenue. At that point, we proceeded to conduct an opening conference with Mr. Calhoun prior to conducting the initial records review and Site walk-through. Mr. Calhoun stated that he served as the Best Management Practice (BMP) inspector after taking over from Syman, LLC in October 2020. Mr. Calhoun had elected to conduct biweekly inspections plus inspections after qualifying rain events (i.e., greater than 0.25" in 24 hours). Mr. Calhoun uses storm data from the NOAA weather station at the Boise airport, Boise Air Terminal (KBOI). During the opening conference, I, Steven Chase, presented my EPA inspector credential to Mr. Calhoun, exchanged business cards, and informed Mr. Calhoun of the purpose of the Site inspection.

Site Description

The Site is located off East Deer Flat Road in the City of Kuna, approximately 12 miles southwest of Boise, ID. The Site includes construction activities for a planned single family home residential community. The Site's northern perimeter extends along East Ardell Street. The Site's eastern perimeter borders undisturbed land. The Site's southern perimeter extends along East Deer Flat Road. The Site's western perimeter extends along North Kay Avenue. For an aerial image of the Site, refer to Attachment B, Exhibit 1. The total planned disturbance area of the construction activities is 115 acres, as described in the Site's Notice of Intent (NOI), which was certified by Mr. Thomas Coleman on November 3, 2017. At the time of the inspection, approximately 40% of the site was undergoing construction in the northern area of the Site. The remaining 60% of the Site had been stabilized. The active construction areas were in various stages of development. In the northeastern area of the Site, rough grading had been completed and utility instillation was in progress. In the northwestern area of the Site, fine grading,

pavement/sidewalk construction, and installation of storm drain inlets and catch basins had been completed, and vertical construction and foundation pouring was in progress. The official receiving water for stormwater discharges from the Site is the Kuna Canal as stated in the Site's NOI. Mr. Calhoun stated that no water is discharged from the site into the Kuna Canal. Mr. Calhoun stated that stormwater is collected in inlets along East Ardell Street and discharges to the City of Kuna Municipal Separate Storm Sewer System (MS4).

Documents Requested During Inspection

Due to the ongoing COVID-19 pandemic, the Inspection Team confirmed Site documentation to be available at the time of the inspection but did not review documentation in detail. Electronic documents were requested by email on February 25, 2021. The below documents were provided on March 19, 2021. The site provided inspection reports for the previous three months of inspections from December 1, 2020 through February 24, 2021. Inspection reports provided by the Permittee are included as Attachment C and the Site's Stormwater Pollution Prevention Plan (SWPPP) is included as Attachment D.

- Current copy of Site SWPPP and map.
- The three most recent months of Site inspection records and corrective action reports.

Section II – Observations

Following the opening conference and records review, the Inspection Team, accompanied by Mr. Calhoun, began the onsite inspection at approximately 1:50 p.m. At the time of the inspection, the weather was mostly overcast, with temperatures in the lower-40s and a steady, mild wind.

We started the Site walk-through on North Hose Gulch Avenue. We progressed south along the roadway and turned left onto East Whig Drive. We followed East Whig Drive to the east and turned right onto North Thorndale Avenue and subsequently right onto North Windmill Way. We followed the roadway and turned right onto East Sweet Pearl Street. We continued east along the roadway and turned left onto North Elk Creek Avenue and subsequently right onto East Ardell Street. We followed the street east until we returned to North Hose Gulch Avenue.

For a list of areas of concern regarding the onsite review of permit required documents, refer to Section III, Areas of Concern. The following field observations were observed by the Inspection Team during the Site walk-through portion of the inspection:

We observed construction activities that consisted of utility installation, foundation pouring, and house construction. We observed an overall lack of adequate stabilization measures at the Site.

As we progressed south along North Gulch Way, we observed a location where the Site had been accessed by vehicles or construction equipment at non-designated exits (refer to Area of Concern 4). We turned onto East Whig Drive and observed two uncovered plywood containers of construction waste (refer to Area of Concern 5). We continued onto North Windmill Way and progressed towards the northwest Site boundary. We observed two locations of uncontained construction waste and debris next to uncovered plywood containers of construction waste (refer to Area of Concern 5).

We turned right onto East Sweet Pearl Street and observed another location of uncontained construction waste and debris next to an uncovered plywood container of construction waste on the western end of the roadway (refer to Area of Concern 5). We continued along East Sweet Pearl Street to the intersection with North Destiny Avenue and observed the location of three unstabilized soil and gravel stockpiles on the roadway (refer to Areas of Concern 4 and 6). We turned onto North Elk Creek Avenue and observed another location of uncontained construction waste and debris next to an uncovered plywood container on the southern end of the roadway (refer to Area of Concern 5). We then turned right onto East Ardell Street and followed the street to the east until we returned to North Hose Gulch Avenue.

We drove to the southern boundary of the site to North Sailer Way to observe Kuna Canal (refer to Attachment A, Photographs 1 and 2). Mr. Calhoun stated that stormwater is not discharged to the canal. Mr. Calhoun also stated that the western side of the canal is consistently dry, but that the eastern side of the canal receives irrigation flow from offsite. At the time of the inspection, no flow was observed in the canal.

We concluded the Site walk-through on North Sailer Way.

Section III – Areas of Concern

The presentation of areas of concern does not constitute a formal compliance determination or violation. An area of concern is an observation that the Inspection Team made that may be inconsistent with the requirements of the Permit. The Inspection Team noted areas of concern in both the records review performed post-inspection and the onsite field inspection.

Records Review Areas of Concern

1. **Permit Part 7.2.4 (Site Map)**

   Include a legible map, or series of maps, showing the following features of the site:

   a. Boundaries of the property;
   b. Locations where construction activities will occur, including:
      i. Locations where earth-disturbing activities will occur (note any phasing), including any demolition activities;
      ii. Approximate slopes before and after major grading activities (note any steep slopes (as defined in Appendix A));
      iii. Locations where sediment, soil, or other construction materials will be stockpiled;
      iv. Any water of the U.S. crossings;
      v. Designated points where vehicles will exit onto paved roads;
      vi. Locations of structures and other impervious surfaces upon completion of construction; and
      vii. Locations of on-site and off-site construction support activity areas covered by this permit (see Part 1.2.1c).

c. *Locations of all waters of the U.S. within and one mile downstream of the site's discharge point. Also identify if any are listed as impaired, or are identified as a Tier 2, Tier 2.5, or Tier 3 water;*
d. *Areas of federally listed critical habitat within the site and/or at discharge locations;*
e. *Type and extent of pre-construction cover on the site (e.g., vegetative cover, forest, pasture, pavement, structures);*
f. *Drainage patterns of stormwater and authorized non-stormwater before and after major grading activities;*
g. *Stormwater and authorized non-stormwater discharge locations, including:*
    i. *Locations where stormwater and/or authorized non-stormwater will be discharged to storm drain inlets; and*
    ii. *Locations where stormwater or authorized non-stormwater will be discharged directly to waters of the U.S.*
h. *Locations of all potential pollutant-generating activities identified in Part 7.2.3g;*
i. *Locations of stormwater controls, including natural buffer areas and any shared controls utilized to comply with this permit; and*
j. *Locations where polymers, flocculants, or other treatment chemicals will be used and stored.*

AND

Permit Part 7.3 (On-Site Availability of Your SWPPP)

You must keep a current copy of your SWPPP at the site or at an easily accessible location so that it can be made available at the time of an on-site inspection or upon request by EPA; a state, tribal, or local agency approving stormwater management plans; the operator of a storm sewer system receiving discharges from the site; or representatives of the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS).

EPA may provide access to portions of your SWPPP to a member of the public upon request. Confidential Business Information (CBI) will be withheld from the public, but may not be withheld from EPA, USFWS, or NMFS.

If an on-site location is unavailable to keep the SWPPP when no personnel are present, notice of the plan's location must be posted near the main entrance of your construction site.

AND

Permit Part 7.1 (General Requirements)

All operators associated with a construction site under this permit must develop a SWPPP consistent with the requirements in Part 7 prior to their submittal of the NOI. The SWPPP must be kept up-to-date throughout coverage under this permit. If a SWPPP was prepared under a previous version of this permit, the operator must review and update the SWPPP to ensure that this permit's requirements are addressed prior to submitting an NOI for coverage under this permit.

(Area of Concern 1)

During the initial onsite records review, we observed that the Site map did not include all minimum information as required by Part 7.2.4 of the Permit. Specifically, the Site map did not identify the elements required by Part 7.2.4.b through 7.2.4.j of the Permit. Mr. Calhoun stated that additional Site maps existed that depicted the required elements, but at the time of the inspection, they could not be located (refer to Attachment B, Exhibit 2).

During the post-inspection records review, we observed the additional maps provided in the SWPPP (refer to Attachment D). We observed that there was not an updated SWPPP map that presented the Site as it was observed during the inspection. We observed the following information missing in the SWPPP maps (refer to Attachment D):

- Permit Part 7.2.4.b.i Locations where earth-disturbing activities will occur (note any phasing), including any demolition activities – We observed two phases during the inspection, Phases 6 and 7. Phase 7 was not located on the SWPPP maps.

- Permit Part 7.2.4.b.iii Locations where sediment, soil, or other construction materials will be stockpiled – We observed one location at the southern end of North Elk Creek Avenue where three soil and gravel stockpiles were located. However, the stockpiles were not shown on the SWPPP maps.

2. Permit Part 7.2.10 (SWPPP Certification)

You must sign and date your SWPPP in accordance with Appendix I, Part I.11.

(Area of Concern 2)

During the post-inspection records review, we observed that the Permittee did not sign the Subcontractor Certifications/Agreements forms located in Appendix G of the SWPPP, although the form was signed by the Syman, LLC Project Manager, Mr. Adam Lyman, on November 2, 2017 (refer to Attachment D).

3. Permit Part 5.2 (Corrective Action Deadlines)

For any corrective action triggering conditions in Part 5.1, you must:

5.2.1 Immediately take all reasonable steps to address the condition, including cleaning up any contaminated surfaces so the material will not discharge in subsequent storm events;
5.2.2 When the problem does not require a new or replacement control or significant repair, the corrective action must be completed by the close of the next business day;
5.2.3 When the problem requires a new or replacement control or significant repair, install the new or modified control and make it operational, or complete the repair, by no later than seven (7) calendar days from the time of discovery. If it is infeasible to complete the installation or

repair within seven (7) calendar days, you must document in your records why it is infeasible to complete the installation or repair within the 7-day timeframe and document your schedule for installing the stormwater control(s) and making it operational as soon as feasible after the 7-day timeframe. Where these actions result in changes to any of the stormwater controls or procedures documented in your SWPPP, you must modify your SWPPP accordingly within seven (7) calendar days of completing this work.

(Area of Concern 3)

We observed three instances of ongoing deficiencies stated in the inspection reports that were in need of corrective actions as observed by Mr. Calhoun during routine inspections. The following corrective actions were observed to not have been completed by the close of the next business day following their observation as required by part 5.2.2 of the Permit (refer to Attachment C):

- On January 5, 2021, sediment had been observed on East Ardell Street and rocks had been observed in gutters. The sediment along East Ardell Street was listed as corrected on January 11, 2021 outside the timeline for corrective action listed in Permit part 5.2.2.

- No stabilization measures had been observed on North Hose Gulch Avenue, and sediment had been observed on North Hose Gulch Avenue. The action had stated to be corrected on January 11, 2021. On January 14, 2021, the actions were stated to be unaddressed and a due date of January 19, 2021 was listed. Subsequent reports list that the action item was corrected on February 10, 2021. However, on January 20, 2021, January 27, 2021, February 4, 2021, and February 11, 2021, the lack of stabilization measures observed on North Hose Gulch Avenue were still stated to be unaddressed. It was unclear to the Inspection team the status of the corrective action from the reports.

- On January 20, 2021, track out was observed (unclear where the track out occurred). The action had stated to be corrected on January 25, 2021. On January 27, 2021, the action was stated to be unaddressed. It was unclear to the Inspection team the status of the corrective action from the reports.

Field Observation Areas of Concern

4. Permit Part 2.2.4 (Minimize sediment track-out)

a. Restrict vehicle use to properly designated exit points;
b. Use appropriate stabilization techniques at all points that exit onto paved roads.

i. Exception: Stabilization is not required for exit points at linear utility construction sites that are used only episodically and for very short durations over the life of the project, provided other exit point controls are implemented to minimize sediment track-out;

c. Implement additional track-out controls as necessary to ensure that sediment removal occurs prior to vehicle exit; and

d. Where sediment has been tracked-out from your site onto paved roads, sidewalks, or other paved areas outside of your site, remove the deposited sediment by the end of the same business day in which the track-out occurs or by the end of the next business day if track-out occurs on a non-business day. Remove the track-out by sweeping, shoveling, or vacuuming these surfaces, or by using other similarly effective means of sediment removal. You are prohibited from hosing or sweeping tracked-out sediment into any stormwater conveyance, storm drain inlet, or water of the U.S.

AND

SWPPP Part 4.3 (Sediment track-out)

"The contractor will eliminate or control tracking of sediment from the site through implementation of the following:

- Establish stabilized entrances (See Stabilized Construction Entrance BMP below).
- Establish stabilized staging areas (See Staging Area BMP below).
- Control construction traffic through the use of project signs and coordination with project leaders.
- Keep construction traffic on established roadways as much as possible.
- If tires become excessively dirty, manually clean mud or dirt from tires with brooms and shovels prior to the equipment exiting the site.
- Only allow equipment and trucks on bare soil when absolutely necessary."

(Area of Concern 4)

We observed that construction vehicle access had not been restricted to properly designated exit points. We observed one location on the southern area of North Hose Gulch Avenue where the Site had been accessed by vehicles or construction equipment at non-designated entrance/exits, causing sediment track-out on North Hose Gulch Avenue (refer to Attachment A, Photograph 3). Stabilization techniques had not been installed at the point where vehicle traffic entered on to paved roadway.

Additionally, we observed sediment track-out outside of house lot 2202 on North Windmill Way (refer to Attachment A, Photographs 4 and 5). We also observed sediment track-out around the three soil and gravel stockpiles located

at the intersection of North Destiny Avenue and East Sweet Pearl Street (refer to Attachment A, Photograph 6).

During the onsite records review, Mr. Calhoun shared with the Inspection Team a biweekly street sweeping schedule dated February 11, 2021 to help mitigate the ongoing track-out issues.

5. Permit Part 2.3.3.e (Erosion and Sediment Control Requirements)

For construction and domestic wastes:

i. Provide waste containers (e.g., dumpster, trash receptacle) of sufficient size and number to contain construction and domestic wastes;
ii. Keep waste container lids closed when not in use and close lids at the end of the business day for those containers that are actively used throughout the day. For waste containers that do not have lids, provide either (1) cover (e.g., a tarp, plastic sheeting, temporary roof) to minimize exposure of wastes to precipitation, or (2) a similarly effective means designed to minimize the discharge of pollutants (e.g., secondary containment);
iii. On business days, clean up and dispose of waste in designated waste containers; and
iv. Clean up immediately if containers overflow.

AND

SWPPP Part 5.5.5 (Construction and domestic waste)

"A dumpster will be kept on the site when needed. All waste containers will have a lid, cover, or similarly effective means to minimize discharge of pollutants. Waste container lids must be closed when not in use and at the end of the business day."

(Area of Concern 5)

We observed six uncontained and/or uncovered piles of construction waste and debris throughout the Site. We observed two piles on East Whig Drive, two on North Windmill Way (house lot 2009), one on the western end of East Sweet Pearl Street, and one at the southern end of North Elk Creek Avenue (refer to Attachment A, Photographs 4, 5, and 7 through 11).

6. Permit Part 2.2.5 (Manage stockpiles or land clearing debris piles composed, in whole or in part, of sediment and/or soil)

a. Locate the piles outside of any natural buffers established under Part 2.2.1 and away from any stormwater conveyances, drain inlets, and areas where stormwater flow is concentrated;
b. Install a sediment barrier along all downgradient perimeter areas;
c. For piles that will be unused for 14 or more days, provide cover or appropriate temporary stabilization (consistent with Part 2.2.14);

d. You are prohibited from hosing down or sweeping soil or sediment accumulated on pavement or other impervious surfaces into any stormwater conveyance, storm drain inlet, or water of the U.S.

AND

SWPPP Part 5.5.5 (Construction and domestic waste)

"During the rainy season the stockpiles should be covered with a heavy poly sheeting or protected with a temporary sediment perimeter barrier such as silt fence or fiber wattle to prevent sediment erosion. As an alternative to surrounding stockpiles with perimeter controls, place stockpiles in areas that are graded to prevent any stormwater discharge. During the non-rainy season the stockpiles should be covered or protected with a temporary perimeter barrier prior to the onset of precipitation…To prevent stormwater pollution from stockpiles, the following guidelines will be followed:

- Whenever possible, only stockpile materials that can be used within a few days.
- Never stockpile materials near or in a stormwater conveyance.
- Stockpile excavated materials up-slope of the excavation whenever possible.
- For utility lines, only excavate areas that can be back filled in one day.
- Monitor weather to anticipate possible storm events.
- Keep extra materials such as sand bags, sheeting, and perimeter controls on site for use when precipitation is eminent.
- Apply dust control water regularly to stockpiles of materials susceptible to wind erosion."

(Area of Concern 6)

We observed three unstabilized soil and gravel stockpiles located at the intersection of North Destiny Avenue and East Sweet Pearl Street. The stockpiles did not have sediment barriers along the downgradient perimeter areas in the roadway. The stockpiles also appeared to contribute to the sediment track-out around the stockpiles on the roadway (refer to Attachment A, Photograph 4).

The Inspection Team could not determine when the stockpile materials would be used, or if perimeter controls were used during precipitation, since no precipitation was observed.

Section IV – Closing Conference

We held a closing conference at the conclusion of the inspection at approximately 2:35 p.m. During the closing conference, we clearly stated that this summary of observations (i.e., areas of concern) was "preliminary" and subject to addition, deletion, and/or modification. The summary of preliminary inspection observations and areas of concern were communicated with Mr. Calhoun of Toll Brothers, Inc.

- Area of Concern 1 – Onsite map did not contain all required information and SWPPP maps were not reflective of current Site conditions and did not have all Permit required information;
- Area of Concern 2 – Incomplete signing of the Subcontractor Certifications/Agreements forms in the SWPPP;
- Area of Concern 3 – Delay of implementing corrective actions identified during Site inspections;
- Area of Concern 4 – Site access not restricted to designated stabilized exits and track-out;
- Area of Concern 5 – Uncontained/uncovered construction waste abd debris;
- Area of Concern 6 – Unstabilized soil and gravel stockpiles;

The closing conference concluded at approximately 2:45 p.m.

Attachment A – Photograph Log and Photos

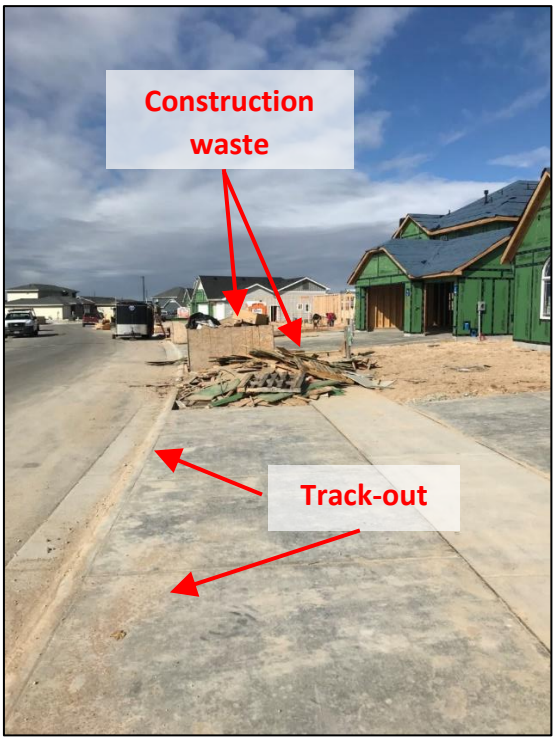
Photograph Log

The photographs were taken during the inspection by Mr. Steven Chase, PG Environmental, and Kelly Davis, Eastern Research Group, Inc., U.S. EPA Contractors, using iPhones. Original copies of the photos are on file.

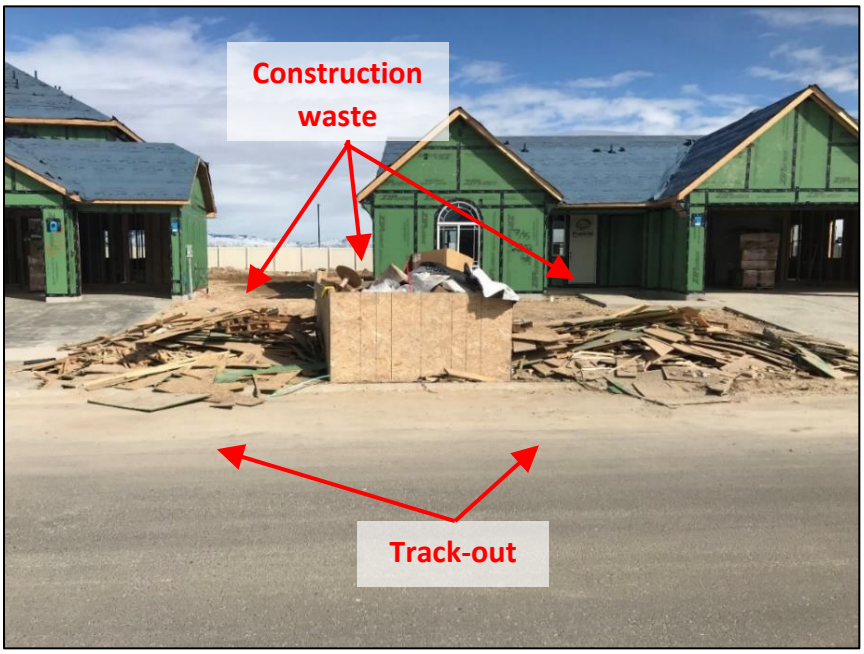
Photograph 1. View, facing west, of the Kuna Canal as seen from North Sailer Way. Note the silt fence located north of the Kuna Canal.

Photograph 2. View, facing east, of the Kuna Canal as seen from North Sailer Way. Note the fiber roll located north of the Kuna Canal.

Photograph 3. View, facing southeast, of sediment track out onto North Hose Gulch Avenue due to access by vehicles or construction equipment at non-designated entrance/exits.



Photograph 4. View, facing west, of uncontained construction waste and an uncovered plywood container containing construction waste outside of house lot 2202 on North Windmill Way. Note the track-out onto North Windmill Way.

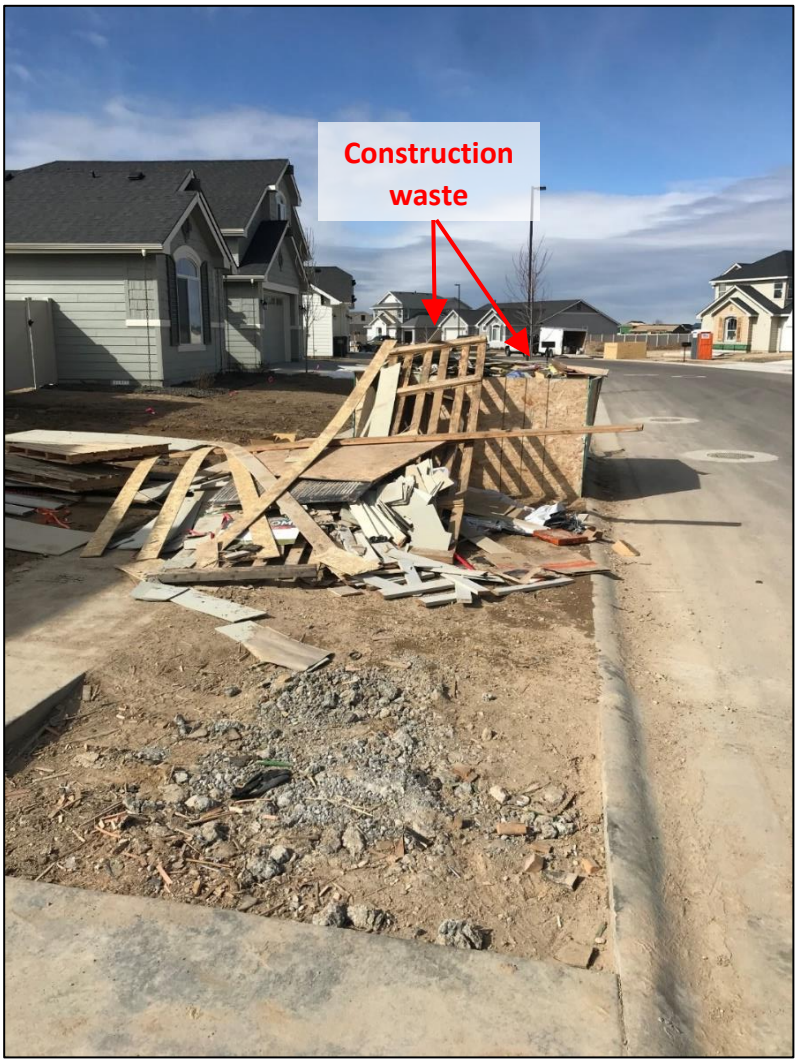


Photograph 5. Another view, facing north, of uncontained construction waste and an uncovered plywood container containing construction waste outside of house lot 2202 at the center of North Windmill Way as shown in Photograph 4.

Photograph 6. View, facing southwest, of a location of three unstabilized soil and gravel stockpiles located at the intersection of North Destiny Avenue and East Sweet Pearl Street. Note the sediment track-out on East Sweet Pearl Street.

Photograph 7. View, facing south, of an uncovered plywood container holding construction waste and debris at the western end of East Whig Drive.

Photograph 8. View, facing east, of uncovered construction plywood container holding waste and debris at the eastern end of East Whig Drive.



Photograph 9. View, facing east, of uncontained construction waste and an uncovered plywood container containing construction waste outside of house lot 2009 at the center of the Site on North Windmill Way.

Photograph 10. View, facing east, of uncontained construction waste and an uncovered plywood container containing construction waste outside of house lot 876 on the western end of East Sweet Pearl Street.

Photograph 11. View, facing south, of uncontained construction waste and an uncovered plywood container containing construction waste at the southern end of North Elk Creek Avenue.

Attachment B – Exhibit Log

Exhibit 1. Google Maps (copyright date: 2021). Location of Sterling Ranch in Kuna, Idaho. Note the approximate Site perimeter outlined with the dotted yellow line and the approximate area of active construction outlined with the dotted white line.

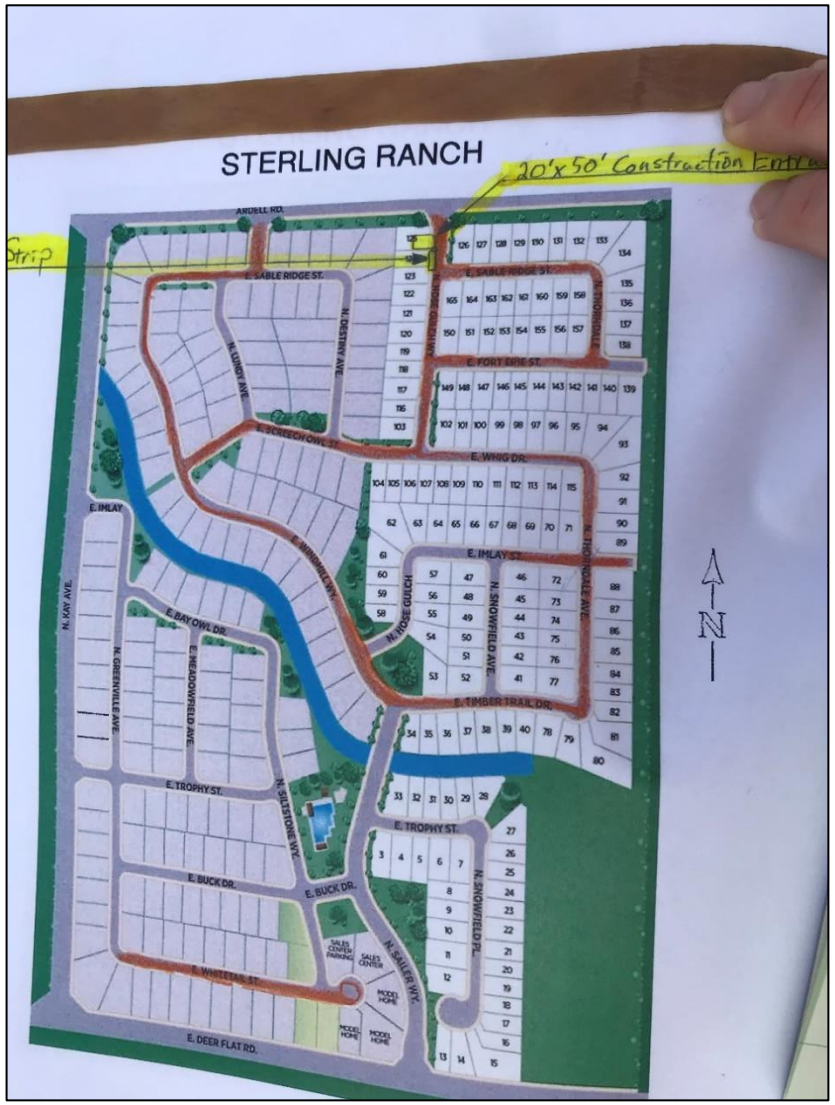


Exhibit 2. Image of the Site map provided by Site representatives on the date of the inspection. Note that the Site map does not identify the elements required by Part 7.2.4.b through 7.2.4.j of the Permit. The Site map is not replicated in the SWPPP. Note that the road names are inconsistent with the names observed on Site and on iMap app.