



**REGION 3**

PHILADELPHIA, PA 19103

**Report Title:** Clean Water Act Compliance Inspection Report  
**Inspection Date(s):** 11/09/2023  
**Regulatory Program(s):** National Pollutant Discharge Elimination System (NPDES)  
**Type of Activity:** Construction Stormwater  
**Site/Facility Name:** McMillan Slow Sand Filtration Site  
**Permittee(s):** Gilbane Building Company  
**Site/Facility Operator:** Gilbane Building Company  
**Site/Facility Address:** 2700 North Capitol Street, NW  
 Washington, D.C., 20002  
**Latitude:** 38.9245 **Longitude:** -77.00909  
**County/Parish:** District of Columbia  
**Permit Number:** DCR10009U  
**NAICS Code:** 236115 **SIC:** 1521  
**DSBID #:** ECAD-531

<b>Site/Facility Representative(s):</b>	<b>Point of Contact</b>
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## I. Introduction

On November 9, 2023, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region 3 (hereinafter, “EPA Inspection Team”) conducted a Construction Stormwater Inspection of the McMillan Slow Sand Filtration Site facility (hereinafter, “the facility”) located at 2700 North Capitol Street NW, Washington, D.C. 20002. The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the facility’s coverage under EPA’s National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) Permit No. DCR10009U (hereinafter, the “Permit”) and applicable State and Federal regulations. The permit became effective on May 12, 2022 and shall expire on February 16, 2027.

### A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at est. 10:00 AM for the inspection. Inspectors met with the following facility representative:

**Table 1. Inspection Attendee List**

Name	Affiliation	Telephone	Email
<b>EPA Region 3 Inspectors</b>			
Angela Weisel	Lead EPA Inspector	215-814-2124	Weisel.angela@epa.gov
Michael Greenwald	EPA Inspector	215-814-2398	Greenwald.michael@epa.gov
<b>Site/Facility Representatives</b>			
Troy Reimers	Gilbane Building Company	303-210-6666	Treimers@gilbaneco.com
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<b>State or County Representatives</b>			
Izanami Navarro	DC DOEE	202-604-5894	Izanami.navarro@dc.gov
Marquis Reece	DC DOEE	202-424-9161	Marquis.reece@dc.gov

Angela Weisel displayed her credentials to the facility representative at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in Attachment A. The EPA Inspection Team informed the facility representative that any information that the facility deemed to be confidential business information (“CBI”) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA’s CBI procedures.

## B. Weather and Precipitation Conditions

During the inspection, weather was sunny. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in Table 2 below:

**Table 2. Precipitation Data**

Station Name	Date	Precipitation Amount (inches)
WASHINGTON 2.6 NE, DC US, S1DCDC0026	11/4/2023	0
WASHINGTON 2.6 NE, DC US, S1DCDC0026	11/5/2023	0
WASHINGTON 2.6 NE, DC US, S1DCDC0026	11/6/2023	0
WASHINGTON 2.6 NE, DC US, S1DCDC0026	11/7/2023	0
WASHINGTON 2.6 NE, DC US, S1DCDC0026	11/8/2023	0
WASHINGTON 2.6 NE, DC US, S1DCDC0026	11/9/2023	0

## C. Summary of the Facility

The facility is a construction stormwater site located at 2700 North Capitol Street, NW, Washington, D.C., 20002. The facility is operated by Gilbane Building Company (“Gilbane”). The project is in its final stage of building and is expected to be completed on 1/1/2024. The site proposes the construction of a community center, public plaza, public playground, public field, and reconstruction of the south service court on a previously abandoned water filtration facility site. The total estimated area to be disturbed is 29.75 acres, however the active area of construction visited during the inspection covered about 7.44 acres.

## II. Facility Activity and Walkthrough

As part of the inspection process, the EPA Inspection Team visually observed the facility conditions in the presence of the facility representative. The primary purpose of the inspection was to assist EPA in assessing the facility’s compliance with Permit requirements.

The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Michael Greenwald of EPA, and are provided in Attachment B, Photograph Log. Documents used to support the observations in this report are included in Attachment C, Exhibit Log.

The EPA Inspection Team began the walk-through at the main construction entrance located at the intersection of McMillan Drive NW and 1<sup>st</sup> Street NW (refer to Attachment B, Photographs 002 – 004).

At the main construction entrance, signage was posted on the entrance gates including various permits and DOEE signage (refer to Attachment B, Photographs 006 through 008). The

condition of the main construction entrance was observed (refer to Attachment B, Photographs 009 through 011) before heading west on the site perimeter towards 1<sup>st</sup> Street NW.

The EPA Inspection Team observed that landscaping had recently been done, along with sidewalk stabilization along some stretches of the perimeter along 1<sup>st</sup> Street NW. Super silt fences were observed along a portion of this section of the site (refer to Attachment B, Photographs 013 through 015). Approximately 15 feet before the corner of 1<sup>st</sup> Street NW, the super silt fence had been removed. Erosion channels were observed at this location (refer to Attachment B, Photographs 016 and 017). The EPA Inspection Team continued southwest parallel to Channing St NW to observe the sloped area before the street (refer to Attachment B, Photographs 018 through 026). No erosion and sediment controls were observed along this perimeter of the site. The sloped area had recently been seeded with native grasses to stabilize the area. At the time of the inspection, the seeded area had not taken root yet.

Continuing towards the corner of Channing St. NW and North Capitol St. NW, the EPA Inspection Team observed construction debris on the edge of the property (refer to Attachment B, Photographs 027 and 028). A portion of silt fence was installed at this location but appeared to be in need of maintenance due to sediment buildup (refer to Attachment B, Photograph 029).

The EPA Inspection Team continued east, parallel to North Capitol St. NW to observe the sloped area before the street (refer to Attachment B, Photographs 030 through 033). No erosion and sediment controls were observed along this perimeter of the site.

The EPA Inspection Team observed the secondary construction entrance along North Capitol St. NW (refer to Attachment B, Photographs 035 and 036). No erosion and sediment controls were observed along the sloped area in proximity to the construction entrance at North Capitol St. NW (refer to Attachment B, Photographs 037 through 040). Directly next to the secondary construction entrance, construction debris was observed (refer to Attachment B, Photographs 041 and 042).

The EPA Inspection Team continued the inspection into the center of the construction site. Two concrete washout bins were observed next to active working zones (refer to Attachment B, Photographs 044, 051, and 052). The larger concrete washout bin was leaking at the time of the inspection. Concrete waste was also observed at the site in proximity to the concrete washout bin (refer to Attachment B, Photograph 053).

At the time of the inspection, the bioretention pond was actively being worked on. Sealant cans were observed outside in proximity to the bioretention pond without secondary containment (refer to Attachment B, Photographs 045 through 047). Within this area, the EPA Inspection Team also observed an unstabilized stockpile of soil (refer to Attachment B, Photograph 048).

Continuing through the center of the site, the EPA Inspection Team observed a partially stabilized stockpile with vegetation beginning to take root (refer to Attachment B, Photograph 055). Next to several stockpiles of various aggregates (refer to Attachment B, Photographs 058

and 059), there were two dumpsters observed. One dumpster was labeled metal, and the other was used for various construction debris. At the time of the inspection, no coverings were located nearby (refer to Attachment B, Photograph 056). The EPA Inspection Team also observed an inlet located within the proximity of the dumpsters. Site representatives explained that the inlet was not connected to anything at the time of the inspection (refer to Attachment B, Photograph 057).

### **III. Observations**

The inspection observations below are made pursuant to the requirements of the Permit.

#### **Permit Coverage**

Part 1.5 of the permit requires the permittee to, *“post a sign or other notice of your permit coverage at a safe, publicly accessible location in close proximity to the construction site. The notice must be located so it is visible from the public road that is nearest to the active part of the construction site, and it must use a font large enough to be readily viewed from a public right-of-way. At a minimum, the notice must include:*

- A. The NPDES ID (i.e., permit tracking number assigned to your NOI and the EPA webpage where a copy of the NOI can be found (<https://permitsearch.epa.gov/epermit-search/ui/search>));*
- B. A contact name and phone number for obtaining additional construction site information;*
- C. The Uniform Resource Locator (URL) for the SWPPP (if available), or the following statement: “If you would like to obtain a copy of the Stormwater Pollution Prevention Plan (SWPPP) for this site, contact the EPA Regional Office at [include the appropriate CGP Regional Office contact information found at <https://www.epa.gov/npdes/contact-us-stormwater#regional>];” and*
- D. The following statement “If you observe indicators of stormwater pollutants in the discharge or in the receiving water, contact the EPA through the following website: <https://www.epa.gov/enforcement/report-environmental-violations>.”*

**Observation 1:** At the time of the inspection, NPDES permit signage was not posted at the construction entrance. Signage for various permits, and DOEE signage was found on the fence (refer to Attachment B, Photographs 006- 008).

#### **General Stormwater Control Design, Installation, and Maintenance**

Part 2.1.4 of the permit requires permittees to, *“Ensure all stormwater controls are maintained and remain in effective operating condition during permit coverage and are protected from activities that would reduce their effectiveness.*

- a. Comply with any specific maintenance requirements for the stormwater controls listed in this permit, as well as any recommended by the manufacturer.*

- b. *If at any time you find that a stormwater control needs routine maintenance (i.e., minor repairs or other upkeep performed to ensure the site's stormwater controls remain in effective operating condition, not including significant repairs or the need to install a new or replacement control), you must immediately initiate the needed work, and complete such work by the close of the next business day. If it is infeasible to complete the routine maintenance by the close of the next business day, you must document why this is the case and why the repair or other upkeep to be performed should still be considered routine maintenance in your inspection report under Part 4.7.1c and complete such work no later than seven (7) calendar days from the time of discovery of the condition requiring maintenance.*
- c. *If you must repeatedly (i.e., three (3) or more times) make the same routine maintenance fixes to the same control at the same location, even if the fix can be completed by the close of the next business day, you must either:*
  - i. *Complete work to fix any subsequent repeat occurrences of this same problem under the corrective action procedures in Part 5, including keeping any records of the condition and how it was corrected under Part 5.4; or*
  - ii. *Document in your inspection report under Part 4.7.1c why the specific reoccurrence of this same problem should still be addressed as a routine maintenance fix under this Part.18*
- d. *If at any time you find that a stormwater control needs a significant repair or that a new or replacement control is needed, you must comply with the corrective action deadlines for completing such work in in Part 5.2.1c."*

**Observation 2:** At the time of the inspection, there were several areas where stormwater controls appeared to be in need of maintenance. This included:

1. The silt fence located at the corner of Channing St. NW and North Capitol St. NW (refer to Attachment B, Photographs 027 through 029).
2. The inlet located near the dumpsters on site (refer to Attachment B, Photograph 057). At the time of the inspection, site representatives stated that the inlet was closed off and not connected to anything.

### **Erosion and Sediment Controls**

Part 2.2.3 of the permit requires permittees to, "*Install sediment controls along any perimeter areas of the site that are downslope from any exposed soil or other disturbed areas.*"

**Observation 3:** At the time of the inspection, there were several areas at the site that did not have sediment controls along the perimeter of an area that was downslope from any exposed soil or disturbed area. This includes:

1. The area approximately 15 feet before the corner of First St. NW and Channing St. NW (refer to Attachment B, Photograph 015).
2. The corner of First St. NW and Channing St. NW (refer to Attachment B, Photograph 016).

3. Sloped area along Channing St. NW (refer to Attachment B, Photographs 018 through 026).
4. Sloped area along North Capitol St. NW (refer to Attachment B, Photographs 030 through 033).
5. Another sloped area along North Capitol St. NW near the secondary construction entrance (refer to Attachment B, Photographs 037 through 041).

Part 2.2.4 of the permit requires permittees to, “*Minimize sediment track-out.*” This requires permittees to:

- 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 constructed or natural site drainage feature, storm drain inlet, or receiving water.”*

**Observation 4:** At the time of the inspection, sediment track-out was observed at both construction entrances (at the intersection of McMillan Drive NW and 1<sup>st</sup> Street NW and the entrance at North Capitol Street NW) (refer to Attachment B, Photographs 005 and 036).

**Observation 5:** At the time of the inspection, both construction entrances appeared to be in need of routine maintenance (refer to Attachment B, Photographs 009 through 011 and 035).

Part 2.2.5 of the permit requires permittees to, “*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 constructed or natural site drainage features, storm drain inlets, and areas where stormwater flow is concentrated;*
- b. *Install a sediment barrier along all downgradient perimeter areas of stockpiled soil or land clearing debris piles;*
- 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 constructed or natural site drainage feature, storm drain inlet, or receiving water.*”

**Observation 6:** At the time of the inspection, there were at least five stockpiles of various aggregates and soils on site that were unstabilized and without protection (refer to Attachment B, Photograph 048, 055, 058 and 059). It was unclear if piles were unused for 14 or more days. One pile was partially vegetated.

Part 2.2.14 of the permit requires permittees to, *“Stabilize exposed portions of the site. Implement and maintain stabilization measures (e.g., seeding protected by erosion controls until vegetation is established, sodding, mulching, erosion control blankets, hydromulch, gravel) that minimize erosion from any areas of exposed soil on the site in accordance with Part.”*

**Observation 7:** At the time of the inspection, erosion channels were observed at the corner of First St. NW and Channing St. NW (refer to Attachment B, Photographs 016 and 017) along the steep slopes. Grass seed had been spread along the sloped areas but was not fully established at the time of the inspection (refer to Attachment B, Photographs 018 through 023 and 025 – 026).

### **Pollution Prevention Requirements**

Part 2.3.3 of the permit requires permittees to, *“implement pollution prevention controls in accordance with the following requirements to minimize the discharge of pollutants in stormwater and to prevent the discharge of pollutants from spilled or leaked materials from construction activities... for storage, handling, and disposal of building products, materials, and wastes:*

- a. *For building materials and building products, provide either (1) cover (e.g., plastic sheeting, temporary roofs) to minimize the exposure of these products to precipitation and to stormwater, or (2) a similarly effective means designed to minimize the discharge of pollutants from these areas.*
- ...
- c. *For diesel fuel, oil, hydraulic fluids, other petroleum products, and other chemicals: The following requirements apply to the storage and handling of chemicals on your site. If you are already implementing controls as part of an SPCC or other spill prevention plan that meet or exceed the requirements of this Part, you may continue to do so and be considered in compliance with these provisions provided you reference the applicable parts of the SPCC or other plans in your SWPPP as required in Part 7.2.6b.viii.*
  - i. *If any chemical container has a storage capacity of less than 55 gallons:*
    - a. *The containers must be water-tight, and must be kept closed, sealed, and secured when not being actively used;*
    - b. *If stored outside, use a spill containment pallet or similar device to capture small leaks or spills; and*

- c. *Have a spill kit available on site that is in good working condition (i.e., not damaged, expired, or used up) and ensure personnel are available to respond immediately in the event of a leak or spill...*
- e. *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.”*
    - a. *For waste containers with lids, keep waste container lids closed when not in use, and close lids at the end of the business day and during storm events. For waste containers without 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).”*

Part 2.3.4 of the permit requires permittees to, “For washing applicators and containers used for stucco, paint, concrete, form release oils, curing compounds, or other materials:

- a. *Direct wash water into a leak-proof container or leak-proof and lined pit designed so no overflows can occur due to inadequate sizing or precipitation.”*

**Observation 8:** At the time of the inspection, there were two concrete washout bins observed at the site (refer to Attachment B, Photographs 044 and 051). Both bins were full at the time and one bin was leaking concrete washout (refer to Attachment B, Photograph 052). Concrete waste was also observed in proximity to the concrete washout bin (refer to Attachment B, Photograph 053). Concrete waste was also observed by the main construction entrance (refer to Attachment B, Photograph 012).

**Observation 9:** At the time of the inspection, sealant cans were observed without secondary containment near the bioretention ponds being constructed (refer to Attachment B, Photographs 046 and 047).

**Observation 10:** At the time of the inspection, there were several waste stockpile areas located within the site. These areas were not indicated on the SWPPP map. This includes:

1. Concrete waste by the main construction entrance (refer to Attachment B, Photograph 012).
2. The area at the corner of Channing St NW and North Capitol St NW contained various construction waste (refer to Attachment B, Photographs 027 and 028).
3. The area north of the secondary construction entrance at North Capitol St NW contained various construction waste (refer to Attachment B, Photograph 042).
4. There were two dumpsters on site. Neither dumpster had a cover on at the time of the inspection (refer to Attachment B, Photograph 056). Facility representatives stated that they were covered at the end of the day.

### **Corrective Actions**

Part 5.1 of the permit requires permittees to, “*take corrective action to address any of the following conditions identified at your site:*”

*5.1.1 A stormwater control needs a significant repair or a new or replacement control is needed, or, in accordance with Part 2.1.4c, you find it necessary to repeatedly (i.e., three (3) or more times) conduct the same routine maintenance fix to the same control at the same location (unless you document in your inspection report under Part 4.7.1c that the specific reoccurrence of this same problem should still be addressed as a routine maintenance fix under Part 2.1.4); or*

*5.1.2 A stormwater control necessary to comply with the requirements of this permit was never installed, or was installed incorrectly; or ...”*

Part 5.4.1 of the permit requires a corrective action log be kept:

- a. “Within 24 hours of identifying the corrective action condition, document the specific condition and the date and time it was identified.*
- b. Within 24 hours of completing the corrective action (in accordance with the deadlines in Part 5.2), document the actions taken to address the condition, including whether any SWPPP modifications are required.”*

**Observation 11:** At the time of the inspection, it was unclear what corrective actions were completed as no corrective action log was provided by the facility.

### **Stormwater Pollution Prevention Plan (SWPPP)**

Part 7.2.4 of the permit requires a site map to show 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 receiving water crossings;*
  - v. Designated points where vehicles will exit onto paved roads;*
  - vi. Locations of structures and other impervious surfaces upon completion of*
  - vii. construction; and*
  - viii. Locations of on-site and off-site construction support activity areas covered by this permit (see Part 1.2.1c).*

- c. *Locations of any receiving waters within the site and all receiving waters within one mile downstream of the site's discharge point(s). Also identify if any of these receiving waters are listed as impaired or are identified as a Tier 2, Tier 2.5, or Tier 3 water;*
- d. *Any areas of Federally listed critical habitat within the action area of the site as defined in Appendix A;*
- 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, including a notation of whether the inlet conveys stormwater to a sediment basin, sediment trap, or similarly effective control;*
  - ii. *Locations where stormwater or authorized non-stormwater will be discharged directly to receiving waters (i.e., not via a storm drain inlet); and*
  - iii. *Locations where turbidity benchmark monitoring will take place to comply with Part 3.3, if applicable to your site.*
- h. *Locations of all potential pollutant-generating activities identified in Part 7.2.3g;*
- i. *Designated areas where construction wastes that are covered by the exception in Part 2.3.3e.ii because they are not pollutant-generating will be stored;*
- j. *Locations of stormwater controls, including natural buffer areas and any shared controls utilized to comply with this permit; and*
- k. *Locations where polymers, flocculants, or other treatment chemicals will be used and stored."*

**Observation 12:** The facility provided an E&S map, along with a "SWPPP" map to depict current conditions and stormwater management controls at the site (refer to Attachment C). The maps provided did not include the following elements as required in the permit:

1. Locations where sediment, soil, or other construction materials will be stockpiled;
2. Locations of any receiving waters within the site and all receiving waters within one mile downstream of the site's discharge point(s). Also identify if any of these receiving waters are listed as impaired or are identified as a Tier 2, Tier 2.5, or Tier 3 water;
3. Drainage patterns of stormwater and authorized non-stormwater before and after major grading activities;
4. Locations of all potential pollutant-generating activities identified in Part 7.2.3g;
5. Designated areas where construction wastes that are covered by the exception in Part 2.3.3e.ii because they are not pollutant-generating will be stored;
6. Locations of stormwater controls, including natural buffer areas and any shared controls utilized to comply with this permit; and
7. Locations where polymers, flocculants, or other treatment chemicals will be used and stored.

Part 7.2.1 of the permit requires the SWPPP to, “include a list of all other operators who will be engaged in construction activities at the site, and the areas of the site over which each operator has control.”

Part 7.2.2 of the permit requires the SWPPP to, “Identify the personnel (by name and position) that you have made part of the stormwater team pursuant to Part 6.1, as well as their individual responsibilities, including which members are responsible for conducting inspections. Include verification that each member of the stormwater team has received the training required by Part 6.2. Include documentation that members of the stormwater team responsible for conducting inspections pursuant to Part 4 have received the training required by Part 6.3.”

**Observation 13:** At the time of the inspection, the SWPPP provided by the facility did not have operators listed, or a training log for personnel (refer to Attachment C). The “stormwater team” was not identified in the SWPPP.

Part 7.4.2 of the permit requires permittees to “maintain records showing the dates of all SWPPP modifications. The records must include the name of the person authorizing each change (see Part 7.2.9 above) and a brief summary of all changes.”

**Observation 14:** At the time of the inspection, the facility did not provide a SWPPP modification log.

#### **IV. Records Review**

The EPA Inspection Team reviewed documentation including: E&S Plan, Site “SWPPP”, and most recent self- inspection reports. Documents were sent to the EPA Inspection Team after the inspection and received on November 17, 2023. A copy of these attachments is provided under Attachment C, Exhibit Log.

#### **V. Closing Conference**

After the facility walk, the EPA Inspection Team met with the facility representative for a closing conference. The EPA Inspection Team shared preliminary observations with the facility. The EPA Inspection Team reiterated to the facility representative that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at 12:00 PM.

**VI. List of Attachments**

Attachment A: Construction General Permit

Attachment B: Photograph Log

Attachment C: Exhibit Log

Exhibit 1: E&S Plan

Exhibit 2: Site SWPPP

Exhibit 3: Self- Inspection Reports