CONSTRUCTION STORMWATER GENERAL PERMIT INSPECTION REPORT

State of Washington Department of Ecology

Section A: General Data

Ecology Inspector(s): Morgan Maupin	On-Site Representative Name: Eric Newman Title: Project Manager Phone: Email: eric@themilestonecompanies.com	Inspection Date and Entry/Exit Time: February 10, 2021, 11:05/12:09	Inspection Type: Announced
		Receiving waters: City of Lacey MS4	Permit webpage: https://fortress.wa.gov/ecy/paris/FacilitySummary.aspx?FacilityId=63651

Section B: Background

Note: See Corrections Required Form

The Woodbrook Townhomes project is covered under the State of Washington's Construction Stormwater General Permit (CSWGP). The CSWGP is a National Pollutant Discharge Elimination System (NPDES) and a State Waste Discharge permit for discharge of construction-related stormwater. The purpose of this inspection is to conduct a compliance inspection and to provide technical assistance as appropriate.

Eric Newman, The Milestone Companies, and Rod Hudson (contracted CESCL) were present during inspection and all observations and recommendations were discussed.

Chitosan treatment system was being installed at time of inspection.

Weather at time of inspection: Sunny
Precipitation in the past 24 hours?
☐ Yes
☑ No

Section C: Compliance

Note: See Corrections Required Form

Inspection Checklist

Is the Permit Coverage Letter on-site? ☑ Yes ☐ No	Is a copy of the CSWGP on-site? ☑ Yes ☐ No	Is the Site Log Book Current? ☐ Yes ☐ No	Is the Site Log Book Adequate? ☐ Yes ☐ No
Are Site Inspections Recorded? ☑ Yes ☐ No	Are Site Inspections Adequate? ☐ Yes ☑ No	Permittee has Prepared and Implemented a SWPPP? ☑ Yes ☐ No	Is the SWPPP Adequate? ☐ Yes ☐ No

Samples Taken

☑ Yes
☐ No

NTU: 242

Sample taken by Ecology inspector Morgan Maupin

Violations and action required to achieve compliance	Complete or submit date	Guidance

S5.A High Turbidity Reporting **Failure to report high sediment discharge.** **Failure to meet S5.A:** Anytime sampling performed in accordance with Special Condition S4.C indicates turbidity has reached the 250 NTUs or more (or transparency less than or equal to 6 cm), high turbidity reporting level, the Permittee must notify Ecology within 24 hours of analysis by either calling the applicable Ecology Region's Environmental Report Tracking System (ERTS) number by phone or by submitting an electronic ERTS report (through Ecology's Water Quality Permitting Portal (WQWebPortal) – Permit Submittals when the form is available).	Within **24 hours** of analysis.	Ecology's ERTS homepage
S4.B Site Inspections **Site inspections do not include all violations.** **Failure to meet S4.B:** The site inspections are not adequate. Retain Plans and Records on site, or within reasonable access to the site for use by the operator or for on-site review by Ecology or the local jurisdiction.	**7 days** from the date of this inspection.	Ecology's site inspection form template.
S9.D.2 Establish Construction Access **No stabilized access on most lots.** **Failure to meet S9.D.2.b:** Stabilize access points with a pad of quarry spalls, crushed rock, or other equivalent BMPs, to minimize tracking sediment onto roads., **Roads are caked in dirt. Sweeper being used is not adequate to clean pavement, and should be cleaned with a high efficiency vacuum sweeper.** **Failure to meet S9.D.2.d:** If sediment is tracked off site, clean the affected roadway thoroughly at the end of each day, or more frequently as necessary (for example, during wet weather). Remove sediment from roads by shoveling, sweeping, or pickup and transport of the sediment to a controlled sediment disposal area. Install and maintain adequate construction access to prevent track-out off-site.	Clean the affected roadway thoroughly **at the end of each day**, or more frequently **as necessary**. [or if it's a particular BMP] Immediately begin. Address the problems **no later than 10 days** from the date of this inspection.	BMP C105, BMP C106, BMP C107
S9.D.4 Install Sediment Controls **No sediment controls (silt fence or wattles) around exposed areas.** **Failure to meet S9.D.4.a:** Construct sediment control BMPs (sediment ponds, traps, filters, infiltration facilities, etc.) as one of the first steps in grading. These BMPs must be functional before other land disturbing activities take place. Install sediment controls to minimize the discharge of pollutants, as set forth in permit condition S9.D.4.b.	Immediately begin. Address the problems **no later than 10 days** from the date of this inspection.	C231, C232, C233, C234, C235, C240, C241, C250, C251
S9.D.5 Stabilize Soils **Exposed unworked soils throughout site.** **Failure to meet S9.D.5.a**: The Permittee must stabilize exposed and unworked soils by application of effective BMPs that prevent erosion. Applicable BMPs include, but are not limited to: temporary and permanent seeding, sodding, mulching, plastic covering, erosion control fabrics and matting, soil application of polyacrylamide (PAM), the early application of gravel base on areas to be paved, and dust control. Stabilize exposed and unworked soils, including stockpiles, by application of effective BMPs to prevent erosion, as set forth in permit condition S9.D.5.a and timeline in S9.D.5.d.	Permittee must not allow soils to remain exposed and unworked for more than the time periods set forth below to prevent erosion: During the wet season (October 1 - April 30): **2 days** from the date of this inspection**.**	C120, C121, C122, C123, C124, C125, C126, C130, C131, C140
S9.D.7 Protect Drain Inlets **Catch basin filters throughout site require replacement.** **Failure to meet S9.D.7.a:** Protect all storm drain inlets made operable during construction so that stormwater runoff does not enter the conveyance system without first being filtered or treated to remove sediment. Protect and maintain drain inlets, as set forth in permit condition S9.D.7.a.	Immediately begin. Address the problems **no later than 10 days** from the date of this inspection.	C220

S9.D.9. Control Pollutants **Gas containers sitting out without secondary containment or cover.** **Failure to meet S9.D.9.b:** b. Provide cover, containment, and protection from vandalism for all chemicals, liquid products, petroleum products, and other materials that have the potential to pose a threat to human health or the environment. Minimize storage of hazardous materials on-site. Safety Data Sheets (SDS) should be supplied for all materials stored. Chemicals should be kept in their original labeled containers. On-site fueling tanks must include secondary containment. Secondary containment means placing tanks or containers within an impervious structure capable of containing 110% of the volume of the largest tank within the containment structure. Double-walled tanks do not require additional secondary containment	Immediately begin. Address the problems **no later than 10 days** from the date of this inspection.	BMP C153
S9.D.11 Maintain BMPs **Unmaintained silt fence at discharge point.** **Failure to meet S9.D.11.a:** Permittee must maintain and repair all temporary and permanent erosion and sediment control BMPs as needed to assure continued performance of their intended function in accordance with BMP specifications. Maintain and repair all temporary and permanent BMPs, as set forth in permit condition S9.D.11.a.	Immediately begin. Address the problems **no later than 10 days** from the date of this inspection.	SWMMWW, Chapter II-3 Construction Stormwater BMPs, C150, C160
S9.D.12 Manage the Project **SWPPP is not being followed and BMPs are not being maintained.** **Failure to meet S9.D.12.a:** Phase development projects to the maximum degree practicable and take into account seasonal work limitations. Manage the Project to include inspecting, maintaining and repairing BMPs as needed and maintaining the SWPPP, as set forth in permit conditions S9.D.12.a and S9.D.12.c.	Immediately begin. Address the problems **no later than 10 days** from the date of this inspection.	C150, C160, C162

For assistance with any of these compliance issues or recommendations regarding BMPs, please see the 2019 Stormwater Management Manual for Western Washington (SWMMWW), Volume II, Construction Stormwater Pollution Prevention which includes BMPs for Source Control and Runoff Conveyance and Treatment BMPs. The full SWMMWW is available at: http://www.ecy.wa.gov/programs/wq/stormwater/manual.html.

The Department of Ecology has the authority to issue formal enforcement actions including issuance of orders and civil penalties of up to $10,000 per day per violation for violations of your NPDES permit and/or state laws and regulations.

Noncompliance with the limits, monitoring requirements, terms and/or conditions established in your permit may result in formal enforcement action by the Department of Ecology.

Ecology Inspector (signature): Morgan Maupin Date: February 11, 2021
Ecology Inspector (print name): Morgan Maupin

Water Quality Program
Southwest Regional Office
PO Box 47775 Olympia, WA 98504-7775
SWRO Tel: 360-407-6300

All photos taken by Morgan Maupin

Photo 1

Photo Description: Roads are caked in dirt.

Date:2021/02/10 Time:11:11:57 Lat:47.01344 Long:-122.83108 Direction degrees:300.95

Photo 2

Photo Description: Exposed soils with no sediment controls separating them from the road.

Date:2021/02/10 Time:11:14:37 Lat:47.01381 Long:-122.83038 Direction degrees:246.54

Photo 3

Photo Description: Gas cans require secondary containment or cover.

Date:2021/02/10 Time:11:17:48 Lat:47.0139 Long:-122.82948 Direction degrees:28.55

Photo 4
Photo Description: Roads are caked in dirt, with uncovered stockpiles spilling onto road.

Date:2021/02/10 Time:11:18:55 Lat:47.01384 Long:-122.82893 Direction degrees:73.42

Photo 5

Photo Description: Stockpile spilling onto road.

Date:2021/02/10 Time:11:20:08 Lat:47.01348 Long:-122.82893 Direction degrees:260.66

Photo 6

Photo Description: Tire tracks in dirt, tracking onto road.

Date:2021/02/10 Time:11:20:48 Lat:47.01338 Long:-122.829 Direction degrees:216.6

Photo 7

Photo Description: Drain inlet is caked in dirt.

Date:2021/02/10 Time:11:21:34 Lat:47.01328 Long:-122.82905 Direction degrees:166.44

Photo 8

Photo Description: More soil spilling into road.

Date:2021/02/10 Time:11:22:52 Lat:47.01298 Long:-122.82956 Direction degrees:151.31

Photo 9
Photo Description: Drywall waste on bare ground.

Date:2021/02/10 Time:11:26:24 Lat:47.01291 Long:-122.83057 Direction degrees:192.36

Photo 10
Photo Description: Sediment tracked onto roadway.

Date:2021/02/10 Time:11:29:11 Lat:47.01332 Long:-122.83138 Direction degrees:207.28

Photo 11

Photo Description: Water discharging from the storm pond. Silt fence requires maintenance.

Date:2021/02/10 Time:11:30:50 Lat:47.01411 Long:-122.83167 Direction degrees:346.83

Photo 12

Photo Description: City of Lacey stormwater pond that received runoff form catch basins on surrounding roads.

Date:2021/02/10 Time:11:33:35 Lat:47.01418 Long:-122.8321 Direction degrees:132.49

Photo 13

Photo Description: Exposed slopes.

Date:2021/02/10 Time:11:38:11 Lat:47.0133 Long:-122.83123 Direction degrees:338.75

Photo 14

Photo Description: Silt fence requires maintenance.

Date:2021/02/10 Time:11:41:57 Lat:47.01339 Long:-122.83134 Direction degrees:220.66

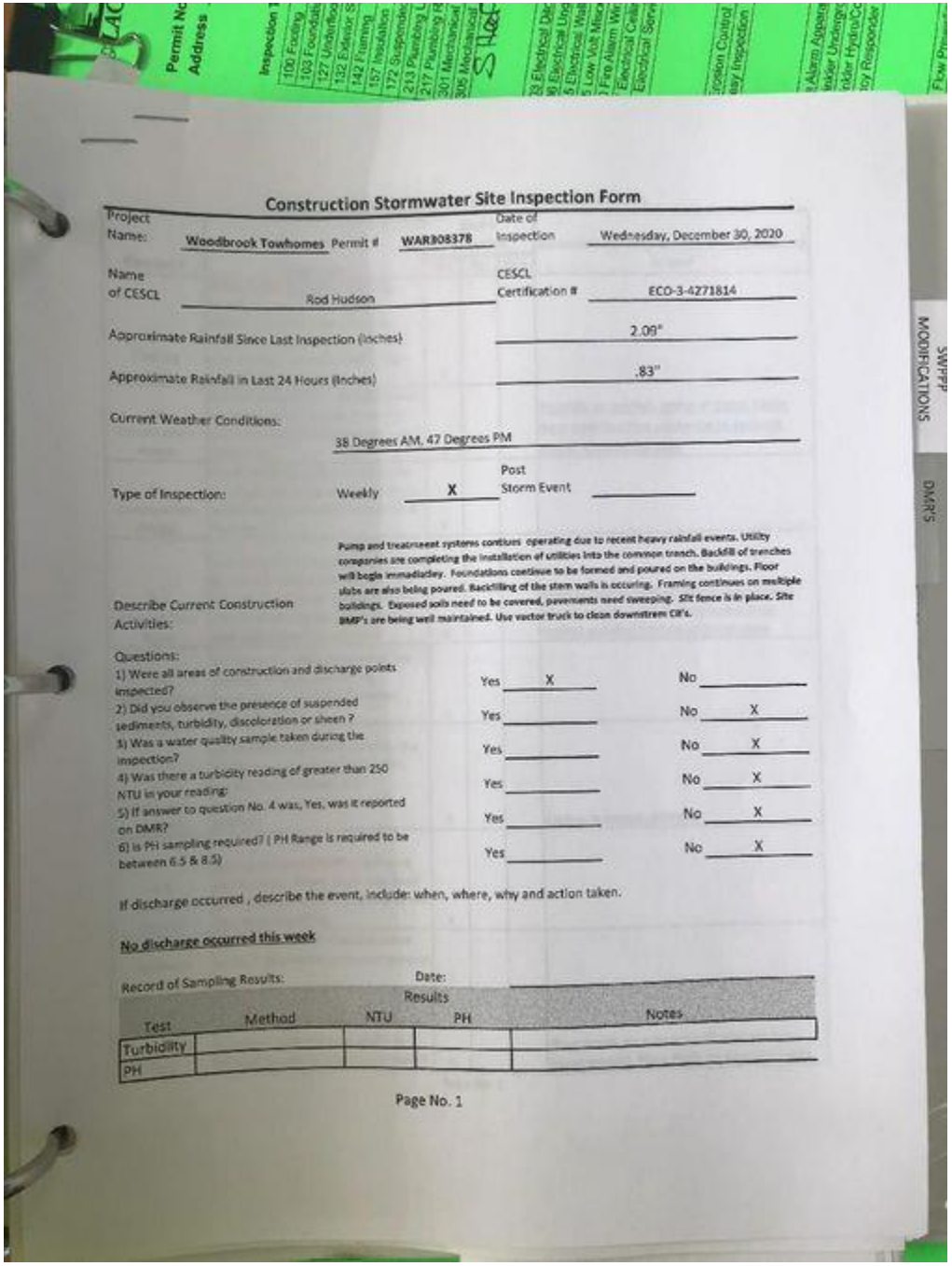
Photo 15

Photo Description: Stormwater pond is at capacity with highly turbid water, and was discharging into city catch basin at time of inspection.

Date:2021/02/10 Time:11:43:46 Lat:47.01387 Long:-122.83037 Direction degrees:172.92

Photo 16

Photo Description: Most recent site inspection in job shack is dated December 30, 2020.



Construction Stormwater Site Inspection Form

Project Name: Woodbrook Townhomes Permit # WAR308378 Date of Inspection Wednesday, December 30, 2020

Name of CESCL: Rod Hudson CESCL Certification # ECO-3-4271814

Approximate Rainfall Since Last Inspection (inches): 2.09"

Approximate Rainfall in Last 24 Hours (Inches): .83"

Current Weather Conditions: 38 Degrees AM, 47 Degrees PM

Type of Inspection: Weekly X Post Storm Event

Describe Current Construction Activities: Pump and treatment systems continue operating due to recent heavy rainfall events. Utility companies are completing the installation of utilities into the common trench. Backfill of trenches will begin immediately. Foundations continue to be formed and poured on the buildings. Floor slabs are also being poured. Backfilling of the stem walls is occuring. Framing continues on multiple buildings. Exposed soils need to be covered, pavements need sweeping. Silt fence is in place. Site BMP's are being well maintained. Use vactor truck to clean downstrem CB's.

Questions:

1) Were all areas of construction and discharge points inspected?	Yes X	No
2) Did you observe the presence of suspended sediments, turbidity, discoloration or sheen ?	Yes	No X
3) Was a water quality sample taken during the inspection?	Yes	No X
4) Was there a turbidity reading of greater than 250 NTU in your reading:	Yes	No X
5) If answer to question No. 4 was, Yes, was it reported on DMR?	Yes	No X
6) Is PH sampling required? (PH Range is required to be between 6.5 & 8.5)	Yes	No X

If discharge occurred , describe the event, include: when, where, why and action taken.

No discharge occurred this week

Record of Sampling Results: Date:

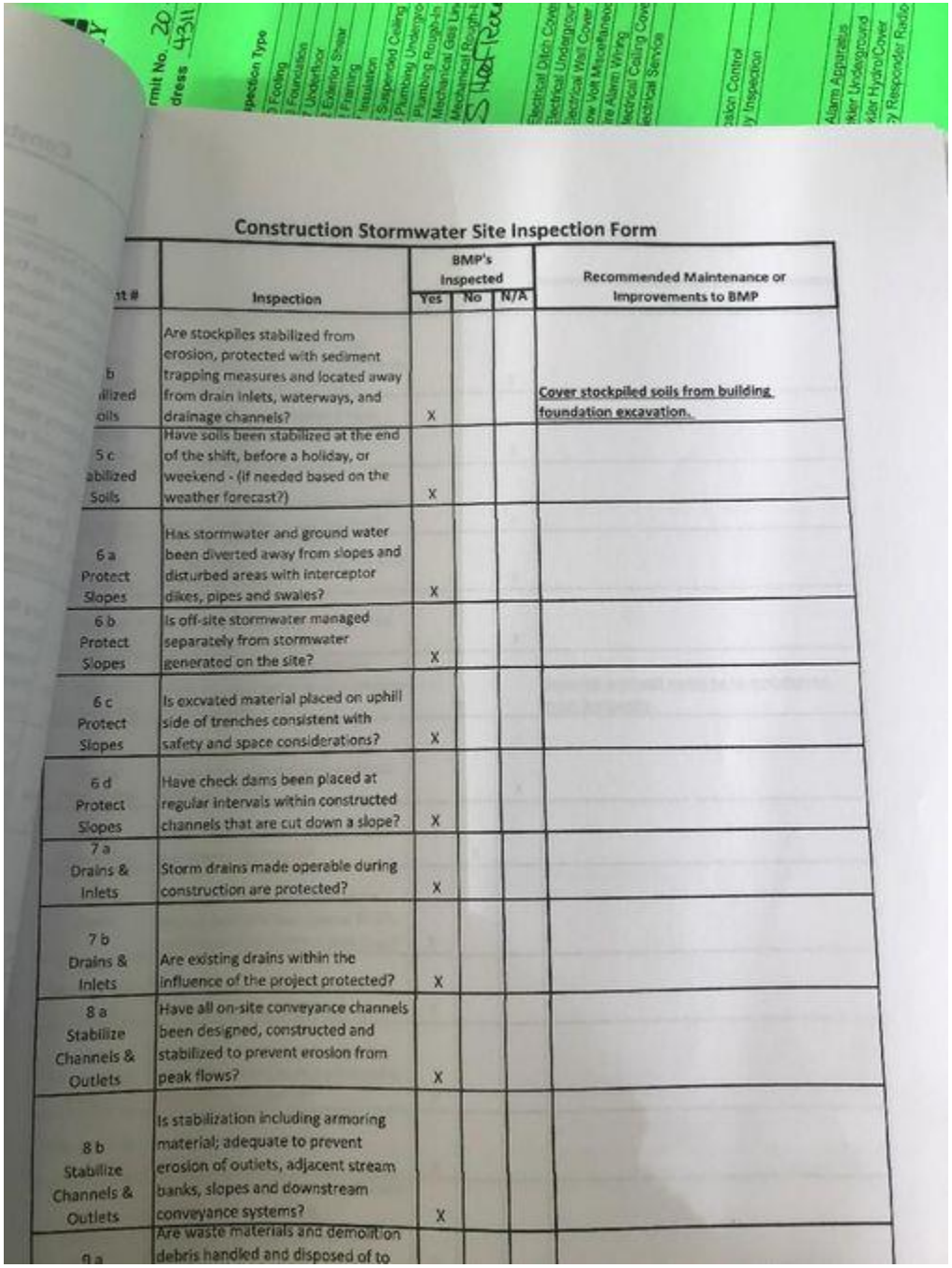
Test	Method	Results NTU	PH	Notes
Turbidity				
PH				

Page No. 1

Date:2021/02/10 Time:11:51:19 Lat:47.01418 Long:-122.82988 Direction degrees:248.27

Photo 17

Photo Description: Inspection form does not mention several violations observed.



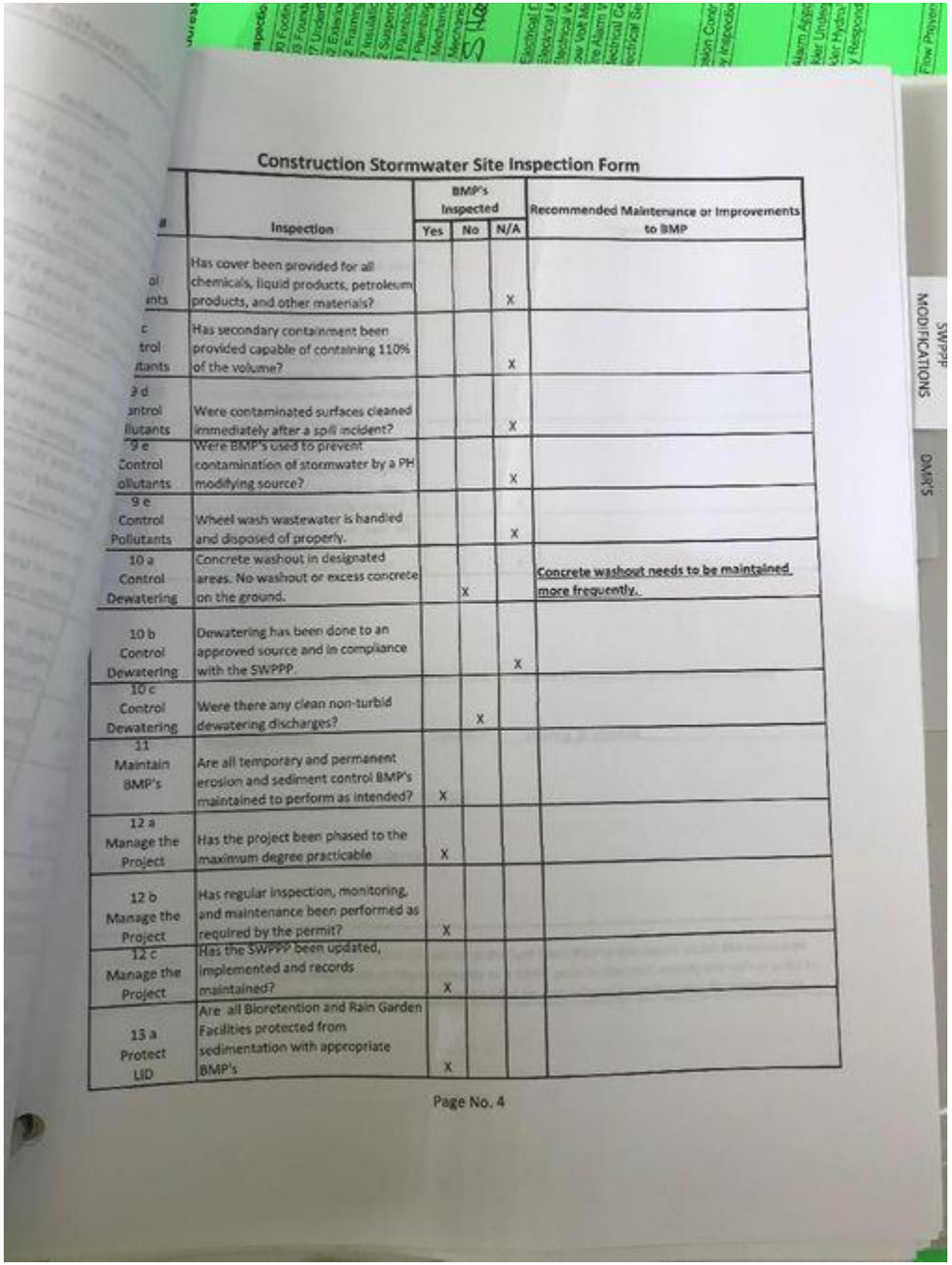
Construction Stormwater Site Inspection Form

Inspection #	Inspection	BMP's Inspected Yes	No	N/A	Recommended Maintenance or Improvements to BMP
b ilized oils	Are stockpiles stabilized from erosion, protected with sediment trapping measures and located away from drain inlets, waterways, and drainage channels?	X			Cover stockpiled soils from building foundation excavation.
5 c abilized Soils	Have soils been stabilized at the end of the shift, before a holiday, or weekend - (if needed based on the weather forecast?)	X			
6 a Protect Slopes	Has stormwater and ground water been diverted away from slopes and disturbed areas with interceptor dikes, pipes and swales?	X			
6 b Protect Slopes	Is off-site stormwater managed separately from stormwater generated on the site?	X			
6 c Protect Slopes	Is excvated material placed on uphill side of trenches consistent with safety and space considerations?	X			
6 d Protect Slopes	Have check dams been placed at regular intervals within constructed channels that are cut down a slope?	X			
7 a Drains & Inlets	Storm drains made operable during construction are protected?	X			
7 b Drains & Inlets	Are existing drains within the influence of the project protected?	X			
8 a Stabilize Channels & Outlets	Have all on-site conveyance channels been designed, constructed and stabilized to prevent erosion from peak flows?	X			
8 b Stabilize Channels & Outlets	Is stabilization including armoring material; adequate to prevent erosion of outlets, adjacent stream banks, slopes and downstream conveyance systems?	X			
9 a	Are waste materials and demolition debris handled and disposed of to				

Date:2021/02/10 Time:11:52:27 Lat:47.01418 Long:-122.82988 Direction degrees:253.72

Photo 18

Photo Description: Inspection form does not mention several violations observed.



Construction Stormwater Site Inspection Form

#	Inspection	BMP's Inspected Yes	No	N/A	Recommended Maintenance or Improvements to BMP
ol ants	Has cover been provided for all chemicals, liquid products, petroleum products, and other materials?			X	
c trol utants	Has secondary containment been provided capable of containing 110% of the volume?			X	
9 d ontrol llutants	Were contaminated surfaces cleaned immediately after a spill incident?			X	
9 e Control ollutants	Were BMP's used to prevent contamination of stormwater by a PH modifying source?			X	
9 e Control Pollutants	Wheel wash wastewater is handled and disposed of properly.			X	
10 a Control Dewatering	Concrete washout in designated areas. No washout or excess concrete on the ground.		X		Concrete washout needs to be maintained more frequently.
10 b Control Dewatering	Dewatering has been done to an approved source and in compliance with the SWPPP.			X	
10 c Control Dewatering	Were there any clean non-turbid dewatering discharges?		X		
11 Maintain BMP's	Are all temporary and permanent erosion and sediment control BMP's maintained to perform as intended?	X			
12 a Manage the Project	Has the project been phased to the maximum degree practicable	X			
12 b Manage the Project	Has regular inspection, monitoring, and maintenance been performed as required by the permit?	X			
12 c Manage the Project	Has the SWPPP been updated, implemented and records maintained?	X			
13 a Protect LID	Are all Bioretention and Rain Garden Facilities protected from sedimentation with appropriate BMP's	X			

Page No. 4

Date:2021/02/10 Time:11:52:41 Lat:47.01418 Long:-122.82988 Direction degrees:248.51

Photo 19

Photo Description: Sample of discharge at time of inspection.

Date:2021/02/10 Time:12:06:50 Lat:47.0136 Long:-122.8316 Direction degrees:346.96

Photo 20
Photo Description: Turbidity of sampled discharge was 242 NTUs.

Date:2021/02/10 Time:12:09:09 Lat:47.0136 Long:-122.8316 Direction degrees:87.27