



# CONSTRUCTION STORMWATER GENERAL PERMIT INSPECTION REPORT

State of Washington Department of Ecology

## Section A: General Data

Inspector(s): Morgan Maupin Carlos Aviles (City of Lacey)	On-Site Representative Name: Brandon Smith Title: Phone: Email:	Inspection Date and Entry/Exit Time: February 24, 2021, 10:01/11:19	Inspection Type: Announced
		Receiving waters: City of Lacey MS4	Permit webpage: <a href="https://fortress.wa.gov/ecy/paxis/FacilitySummary.aspx?FacilityId=63651">https://fortress.wa.gov/ecy/paxis/FacilitySummary.aspx?FacilityId=63651</a>

## 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.

Brandon Smith and Eric Newman (The Milestone Companies), Rod Hudson (the project CESCL), and Carlos Aviles (City of Lacey inspector) were present during inspection and all observations and recommendations were discussed.

Ecology conducted a compliance inspection on January 26<sup>th</sup>, 2021. After this inspection, Ecology issued a corrections required for violating permit conditions S9.D.4, S9.D.5, S9.D.7, S9.D.9, S9.D.11, and S9.D.12

Ecology then conducted a compliance follow-up inspection on February 10<sup>th</sup>, 2021. During this inspection, Ecology concluded that almost nothing had been done to correct the violations observed during the February 26<sup>th</sup> inspection. Ecology also sampled a discharge leaving the site, which measured 242 NTUs. Ecology issued a second corrections required for all of the same permit violations as the January 26<sup>th</sup> corrections required.

Discharge Monitoring Reports show that discharges exceeding 250 NTUs occurred on 11 days in January. An ERTS was not submitted for these discharges.

The purpose of this inspection was to follow up on the corrections required during the February 10<sup>th</sup>, 2021 inspection, and to issue a field Notice of Penalty (NOP) for noncompliance observed during the previous two inspections, including failure to submit ERTS for the turbid discharges that occurred during January. The penalty number is 01211.

At this time a chitosan treatment system is operational, and the level of the stormwater pond has been lowered significantly. This will likely be sufficient to prevent any further turbid discharges, assuming the system remains operational.

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 <u>Letter on-site?</u> <input type="checkbox"/> Yes <input type="checkbox"/> No	Is a copy of the CSWGP <u>on-site?</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Is the Site Log Book <u>Current?</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Is the Site Log Book <u>Adequate?</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<u>Are Site Inspections Recorded?</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Are Site Inspections Adequate?</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Permittee has Prepared and Implemented a SWPPP?</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Is the SWPPP Adequate?</u> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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<u>Violations and action required to achieve compliance</u>	<u>Complete or submit date</u>	<u>Guidance</u>
<u>S9.D.2 Establish Construction Access</u> <b>Individual lot access points are not stabilized.</b> <b>Failure to meet S9.D.2.b:</b> Stabilize access points with a pad of quarry spalls, crushed rock, or other equivalent BMPs, to minimize tracking sediment onto roads., <b>Internal road where employees drive is caked in dirt.</b> <b>Failure to meet S9.D.2.d:</b> 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 <b>at the end of each day</b> , or more frequently <b>as necessary</b> . Immediately begin. Address the problems <b>no later than 10 days</b> from the date of this inspection.	<a href="#">BMP C105</a> , <a href="#">BMP C106</a> , <a href="#">BMP C107</a>
<u>S9.D.4 Install Sediment Controls</u> <b>No sediment controls between exposed areas and catch basins.</b> <b>Ecology surrounding exposed areas with wattles.</b> <b>Failure to meet S9.D.4.a:</b> 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 <b>no later than 10 days</b> from the date of this inspection.	<a href="#">C231</a> , <a href="#">C232</a> , <a href="#">C233</a> , <a href="#">C234</a> , <a href="#">C235</a> , <a href="#">C240</a> , <a href="#">C241</a> , <a href="#">C250</a> , <a href="#">C251</a>
<u>S9.D.5 Stabilize Soils</u> <b>Exposed and unworked soils observed on site.</b> <b>Failure to meet S9.D.5.a:</b> 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): <b>2 days</b> from the date of this inspection.	<a href="#">C120</a> , <a href="#">C121</a> , <a href="#">C122</a> , <a href="#">C123</a> , <a href="#">C124</a> , <a href="#">C125</a> , <a href="#">C126</a> , <a href="#">C130</a> , <a href="#">C131</a> , <a href="#">C140</a>
<u>S9.D.7 Protect Drain Inlets</u> <b>Several drain inlet filters are caked in dirt.</b> <b>Failure to meet S9.D.7.b:</b> Clean or remove and replace inlet protection devices when sediment has filled one-third of the available storage (unless a different standard is specified by the product manufacturer). Protect and maintain drain inlets, as set forth in permit condition S9.D.7.a.	Immediately begin. Address the problems <b>no later than 10 days</b> from the date of this inspection.	<a href="#">C220</a>

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):



Date: February 24, 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: No stabilized access point.





## Photo 2

Photo Description: Road is still caked in dirt. High efficiency vacuum sweeper needed to clean roads.





### Photo 3

Photo Description: Straw has been applied to many of the exposed soils in the center of the site.



Date:2021/02/24 Time:10:13:24 Lat:47.01293 Long:-122.82992 Direction degrees:261.49



**Photo 4**

Photo Description: Stockpile spilling into road. Stockpile must be covered, and sediment controls (I suggest wattles) installed to prevent sediment from entering roadway and catch basins.





**Photo 5**

Photo Description: Road is still caked in dirt. High efficiency vacuum sweeper needed to clean roads.



Date:2021/02/24 Time:10:19:26 Lat:47.01386 Long:-122.82898 Direction degrees:239.39



Photo 6

Photo Description: Straw was being unloaded and applied to exposed soils during inspection.



## Photo 7

Photo Description: Inspection reports on site are now up to date.

**Construction Stormwater Site Inspection Form**

Project Name: Woodbrook Townhomes Permit #: WAR308378 Date of Inspection: Friday, February 19, 2021

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

Approximate Rainfall Since Last Inspection (inches): 3.15"

Approximate Rainfall in Last 24 Hours (inches): 0.34"

Current Weather Conditions: 49 Degrees AM, 37 Degrees PM

Type of Inspection: Weekly ☒ Post Storm Event ☐

Describe Current Construction Activities: Began pumping and treating the stormwater. Pumped and treated on Feb. 19, 20, 21, 22. Floor slabs are being poured as weather permits. Backfilling of the foundation stem walls is occurring. Framing continues on multiple buildings. Many of the BMP's need maintenance.

Questions:

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

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

Began treatment and discharging into the City stormwater.

Record of Sampling Results:

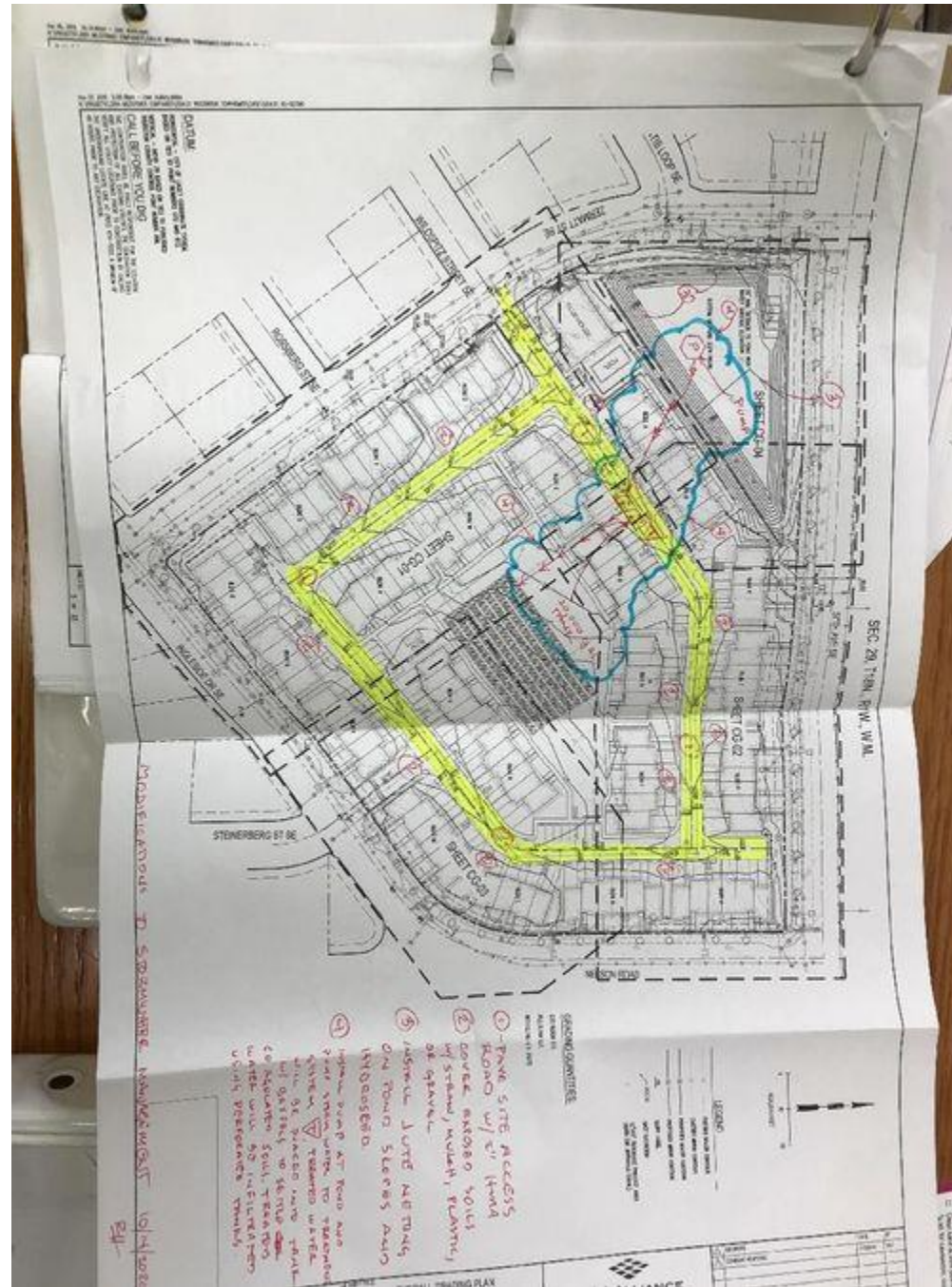
Test	Method	Date: Results		Notes
		NTU	PH	
Turbidity				
PH				

Page No. 1



### Photo 8

Photo Description: SWPPP map needs to be updated to show all current BMPs.





**Photo 9**

Photo Description: Highly turbid water entering catch basin.



Date:2021/02/24 Time:10:48:05 Lat:47.01416 Long:-122.82999 Direction degrees:265.21



Photo 10

Photo Description: Catch basin filter cleaning station.





**Photo 11**

Photo Description: Water level of storm pond is now much lower due to chitosan treatment system treating water and discharging to City of Lacey MS4.



Date:2021/02/24 Time:10:52:16 Lat:47.01366 Long:-122.83116 Direction degrees:287.69



**Photo 12**

Photo Description: Chitosan enhanced sand filtration system is now operational.



Date:2021/02/24 Time:11:19:41 Lat:47.0136 Long:-122.831 Direction degrees:260.46