CONSTRUCTION STORMWATER GENERAL PERMIT
INSPECTION REPORT

State of Washington Department of Ecology

Section A: General Data

Ecology Inspector(s): Shannon Adams	On-Site Representative Name: Clint Hale	Inspection Date: November 9, 2021 Entry/Exit Time: 13:05/13:41	Inspection Type: Unannounced
		Receiving waters: Walla Walla Watershed	Permit webpage: Facility Summary

Section B: Background

The Goodwill Industries 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.

Clint Hale, Chervenell Construction, was present during inspection and all observations and recommendations were discussed.

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

Section C: Compliance

The Goodwill Industries project is permitted for 2.5 acres of soil disturbing activities. The project consists of a new Goodwill Retail Facility and associated parking. The final stormwater design for the site will be to capture and contain a stormwater in infiltration galleries to be constructed on site.

I arrived on site and made contact with Clint Hale - Chervenell Construction. I introduced myself and he was happy to have me on site as he had questions from my previous site visit. No one was present at the first site visit.

I first asked Clint if the Stormwater Pollution Prevention Plan (SWPPP) and SWPPP map were on site for review. Clint had a digital version of the Temporary Erosion and Sediment Control (TESC) plan, which is different from the SWPPP map. I told Clint that they could take a copy of TESC plan, cross off the title and write SWPPP map on the copy. This would be used as the SWPPP map and can be updated as Best Management Practices (BMPs) are maintained, implemented, or changed on site.

I asked if they had a copy of the CSWGP, Permit Coverage Letter, and weekly inspection reports on site or within reasonable access. Clint showed me the daily site checklist but did not have weekly inspection reports with required information. None of the required documentation was on site for review.

I told Clint that failure to have the required site documentation was a violation of permit conditions. I also added that I would attach a copy of the SWPPP Template, Inspection Report Template, digital Copy of the CSWGP, and Coverage Letter when I emailed this report. We discussed that a Certified Erosion and Sediment Control Lead (CESCL) must conduct weekly inspections. Clint said he is not a CESCL.

After discussing the required site documentation, we walked the site. I saw the majority of the site now sits below the installed perimeter silt fence. I saw the silt fence remains improperly installed as it was at my previous inspection. We discussed proper installation of the silt fence. The bottom of the silt fence should be buried a minimum of 4 inches below the ground surface. Backfill and tamp soil in place over the buried portion of the geotextile fabric, so that no flow can pass beneath the silt fence and scouring cannot occur. The silt fence installed on site consists of silt fence with soil placed on one side of the fence and the other side sits at the surface. This allows soil to move freely under the silt fence and discharge off site. We discussed that the silt fence should be installed properly in those areas where there is the potential for soil to leave the site under the silt fence, and soil is exposed at the same elevation of the silt fence.

We saw a catch basin in the street that had inlet protection. We discussed keeping the inlet protection clean so that it functions as intended.

We saw two buckets of foundation sealant sitting on a pallet on the ground. We discussed keeping the sealant in secondary containment to minimize the discharge of pollutants. **Failure to design, install, and maintain effective pollution prevention measures to minimize the discharge of pollutants is a violation of permit condition S9.D.9.**

We discussed tracking sediment off site. Clint told me that the sediment that is tracked off site on the northeastern section of the site is hosed down at the end of each day and flows back to the site. I told Clint that if they choose to use this access point, they need to install a construction access with geotextile fabric and quarry rock. There are businesses north and east of the site that have the potential for patrons of those establishments to drive through tracked off sediment and carry it to the local streets.

Discharge Monitoring Reports (DMRs) have never been submitted for this permit.

All projects covered by the CSWGP are required to achieve all known, available, and reasonable methods of prevention control and treatment (AKART) prior to discharge of stormwater and non-stormwater to waters of the State. This includes preparation and implementation of an adequate Stormwater Pollution Prevention Plan (SWPPP), with all appropriate BMPs installed and maintained in accordance with the SWPPP and the terms and conditions of the CSWGP.

Inspection Checklist

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

Violations and action required to achieve compliance	**Complete or submit date**	**Guidance**
S5.B Discharge Monitoring Reports (DMRs) **Discharge Monitoring Reports (DMRs) must be submitted for this Project.** **Failure to meet S5.B:** Permittees required to conduct water quality sampling in accordance with Special Conditions S4.C (Turbidity/Transparency), S4.D (pH), S8 (303[d]/TMDL sampling), and/or G12 (Additional Sampling) must submit the results to Ecology. If there was no discharge during a given monitoring period, all Permittees must submit a DMR as required with "no discharge" entered in place of the monitoring results.	**15 days** following the end of each month monitoring data must be submitted to Ecology.	WQWebDMR is the tool for submitting DMRs to the Department of Ecology. For technical assistance and help getting registered, contact the WQWebDMR help staff at: E-mail: WQWebPortal@ecy.wa.gov; Phone: 1-800-633-6193/Option 3 or 360-407-7097.
S5.G.1 Access to Plans and Records **Failure to meet S5.G.1:** The Construction Stormwater General Permit was not available onsite. 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 Construction Stormwater General Permit
S4.A Site Log Book **Failure to meet S4.A:** The site maintenance log books 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.	
S4.A Site Inspections **Failure to meet S4.A:** The site inspections are not recorded. 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.

S4.B.1 Site Inspections **Failure to meet S4.B.1:** The Permittee must have staff knowledgeable in the principles and practices of erosion and sediment control. The CESCL (sites one acre or more) or inspector (sites less than one acre) must have the skills to assess the: a. Site conditions and construction activities that could impact the quality of stormwater; and b. Effectiveness of erosion and sediment control measures used to control the quality of stormwater discharges. The SWPPP must identify the CESCL or inspector, who must be present on site or on-call at all times. The CESCL (sites one (1) acre or more) must obtain this certification through an approved erosion and sediment control training program that meets the minimum training standards established by Ecology. (See BMP C160 in the manual, referred to in Special Condition S9.C.1 and 2.)	**7 days** from the date of this inspection.	BMP C160E: Certified Erosion and Sediment Control Lead
S4.B.1.b. Site Inspections **Failure to meet S4.B.1.b:** The SWPPP must identify the CESCL or inspector, who must be present on site or on-call at all times.	**7 days** from the date of this inspection.	BMP C160E: Certified Erosion and Sediment Control Lead
S9.A SWPPP Objectives **Failure to meet S9.A:** The SWPPP was not prepared and implemented. Review the SWPPP for compliance with Special Condition S9 and make appropriate revisions within 7 days of this inspection, per S9.B.2.a. 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 Stormwater Pollution Prevention Plan (SWPPP) template.
S9.C.1 Stormwater Best Management Practices (BMPs) **Failure to meet S9.C1:** BMPs must be consistent with the Stormwater Management Manual for Eastern Washington.	Immediately begin. Address the problems **no later than 10 days** from the date of this inspection.	Ecology's SWMMEW, Chapter 7 BMP Standards and Specifications
S9.D.2 Establish Construction Access Failure to meet S9.D.2.a: Limit construction vehicle access and exit to one route, if possible., 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. 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**. Immediately begin. Address the problems **no later than 10 days** from the date of this inspection.	BMP C105E, BMP C106E, BMP C107E

S9.D.5 Stabilize Soils 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., Failure to meet S9.D.5.d: The Permittee must not allow soils to remain exposed and unworked for more than the time periods set forth below to prevent erosion east of the Cascade Mountains Crest: During the dry season (July 1 - September 30): 10 days or; During the wet season (October 1 - June 30): 5 days., Failure to meet S9.D.5.f: The Permittee must stabilize soil stockpiles from erosion, protected with sediment trapping measures, and where possible, be located away from storm drain inlets, waterways, and drainage channels. 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 – June 30): **5 days** from the date of this inspection**.**	C120E, C121E, C122E, C123E, C124E, C125E, C126E, C130E, C131E,C140E
S9.D.7 Protect Drain Inlets 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.	C220E
S9.D.11 Maintain BMPs 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.	SWMMEW, Chapter 7 Best Management Practices Standards and Specifications, C150E, C160E

For assistance with any of these compliance issues or recommendations regarding BMPs, please see the 2019 Stormwater Management Manual for Eastern Washington (SWMMEW), Chapter 7, Construction Stormwater Pollution Prevention which includes BMPs for Source Control and Runoff Conveyance and Treatment BMPs. The full SWMMEW is available online.

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): Shannon E Adams Date: November 17, 2021

Ecology Inspector (print name): Shannon Adams

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4601 N Monroe Street
Spokane, WA 99205
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All photos taken by Shannon Adams

Photo 1

Photo Description: Sediment tracked off the northeastern part of the site. Site access is not stabilized adequately for traffic.

Date:2021/11/09 Time:13:05:05 Lat:46.05358888888889 Long:-118.37241388888889 Direction degrees:197.81265260821309

Photo 2

Photo Description: Silt fence installed along the site. This portion of silt fence now sits above the soil exposed on site.

Date:2021/11/09 Time:13:33:24 Lat:46.05340555555555 Long:-118.3732611111111 Direction degrees:290.34904458598726

Photo 3
Photo Description: Site access of Northeast C Street.

Date:2021/11/09 Time:13:33:27 Lat:46.05360833333333 Long:-118.37362777777777 Direction degrees:102.01800257179598

Photo 4
Photo Description: Site overview. The majority of the site now sits below the silt fence.

Date:2021/11/09 Time:13:33:33 Lat:46.05317222222222 Long:-118.37370277777777 Direction degrees:71.01779173207744

Photo 5

Photo Description: Site overview. The majority of the site now sits below the silt fence.

Date:2021/11/09 Time:13:33:35 Lat:46.053105555555554 Long:-118.37370277777777 Direction degrees:14.420745847696647

Photo 6

Photo Description: Silt fence on the southeast side of the site is not installed per BMP C233E: Silt Fence. Sediment leaving the site under the silt fence.

Date:2021/11/09 Time:13:35:07 Lat:46.05300277777778 Long:-118.37317777777777 Direction degrees:277.27049256076145

Photo 7

Photo Description: Inlet protection in Northeast C Street should be kept clean and free of debris so it performs as intended.

Date:2021/11/09 Time:13:35:29 Lat:46.05296666666666 Long:-118.37300833333333 Direction degrees:227.1428375034369

Photo 8

Photo Description: Silt fence in the southeast corner of the site needs to be installed properly so sediment does not discharge under the silt fence. The site exposed soils sit at the same elevation as the silt fence at this location.

Date:2021/11/09 Time:13:35:59 Lat:46.05298888888888 Long:-118.37299999999999 Direction degrees:84.54669187145558

Photo 9
Photo Description: Foundation sealant sitting on pallet. Must be kept in secondary containment.

Date:2021/11/09 Time:13:37:42 Lat:46.053016666666664 Long:-118.37332777777777 Direction degrees:12.467681895093063