



CONSTRUCTION STORMWATER GENERAL PERMIT INSPECTION REPORT

State of Washington Department of Ecology

Section A: General Data

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|-------------------------------------|---|---|--|
| Ecology Inspector(s): Chad Sauve | On-Site Representative Name: n/a Title: Phone: Email: | Inspection Date and Entry/Exit Time: February 27, 2025, 16:15/16:45 | Inspection Type: Termination (NOT) Permit# WAR311860 Denied |
| | | Receiving waters: Discharges to groundwater | Permit webpage: https://fortress.wa.gov/ecy/paris/FacilitySummary.aspx?FacilityId=99997973 |

Section B: Background

The VMRD 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.

Responsible party or their representative were not present at the time of inspection. Site is not active.

Ecology arrived on site in response to a Notice of Termination (NOT) to conduct an inspection that the entire site has undergone final stabilization, all temporary BMPs are removed, all stormwater discharges associated with construction activity have been eliminated. (Permit Condition S10.A.1.)

Weather at time of inspection: Sunny Conditions - 58 Degree Temperature
Precipitation in the past 24 hours? No
UIC present?

Section C: Compliance

Inspection Checklist:

Site inspection for Notice of Termination revealed issues with final stabilization and erosion, temporary BMPs are not completely removed, there are ground coverage and vegetation concerns that will need to be addressed, site still has areas contributing to sediment runoff. See photos below for reference. Permittee has been submitting monthly DMR reports but has high NTU/ Turbidity exceeding benchmark levels.

Once work is complete, permittee will have to submit another Notice of Termination application for review.

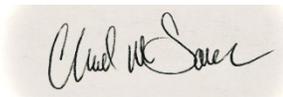
| <u>Violations and action required to achieve compliance</u> | Complete or submit date | Guidance |
|--|---|--|
| <p><u>S9.D.3 Control Flow Rates</u> Control flow rates, as set forth in permit condition S9.D.3.a.</p> | <p>Immediately begin. Address the problems no later than 10 days from the date of this inspection.</p> | <p>https://fortress.wa.gov/ecy/ezshare/wq/SWMMs/2024 SWMMEW/2024 SWMMEW.htm</p> |
| <p><u>S9.D.4 Install Sediment Controls</u> Install sediment controls to minimize the discharge of pollutants, as set forth in permit condition S9.D.4.b.</p> | <p>Immediately begin. Address the problems no later than 10 days from the date of this inspection.</p> | <p>https://fortress.wa.gov/ecy/ezshare/wq/SWMMs/2024 SWMMEW/2024 SWMMEW.htm</p> |
| <p><u>S9.D.5 Stabilize Soils</u> 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.b: The Permittee must control stormwater volume and velocity within the site to minimize soil erosion., Failure to meet S9.D.5.c: The Permittee must control stormwater discharges, including both peak flow rates and total stormwater volume, to minimize erosion at outlets and to minimize downstream channel and stream bank erosion. 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.</p> | <p>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.</p> | <p>https://fortress.wa.gov/ecy/ezshare/wq/SWMMs/2024 SWMMEW/2024 SWMMEW.htm</p> |
| <p><u>S9.D.11 Maintain BMPs</u> Failure to meet S9.D.11.b: Permittee must remove all temporary erosion and sediment control BMPs within 30 days after achieving final site stabilization or after the temporary BMPs are no longer needed. Maintain and repair all temporary and permanent BMPs, as set forth in permit condition S9.D.11.a.</p> | <p>Immediately begin. Address the problems no later than 10 days from the date of this inspection.</p> | <p>https://fortress.wa.gov/ecy/ezshare/wq/SWMMs/2024 SWMMEW/2024 SWMMEW.htm</p> |

For assistance with any of these compliance issues or recommendations regarding BMPs, please see the 2024 Stormwater Management Manual for Eastern Washington (SWMMEW), Volume II, Construction Stormwater Pollution Prevention which includes BMPs for [Source Control](#) and [Runoff Conveyance and Treatment BMPs](#). The full SWMMEW is available at: https://fortress.wa.gov/ecy/ezshare/wq/SWMMs/2024SWMMEW/2024_SWMMEW.htm

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 27, 2025

Ecology Inspector (print name): Chad Sauve

Notice of Termination – Denied

Ecology Report Reviewer (signature):



Date: 3/11/2025

Ecology Reviewer (print name): Art Jenkins

All photos taken by Chad Sauve

Photo 1

Photo Description: Looking South - BMP's/ Silt Fencing have not been removed from site, erosion on slopes throughout site



Date: Time: Lat: Long: Direction degrees:

Photo 2

Photo Description: View facing South from roadway - silt fencing still installed. Erosion and sediment runoff



Date: Time: Lat: Long: Direction degrees:

Photo 3

Photo Description: View facing West - minimal stabilization and vegetation for ground coverage



Date: Time: Lat: Long: Direction degrees:

Photo 4

Photo Description: Looking north from mid project - minimal ground cover / vegetation to protect from sediment infiltration



Date: Time: Lat: Long: Direction degrees:

Photo 5

Photo Description: Looking northeast from roadway - minimal ground cover / sediment infiltration outside work area / BMP's not removed



Photo 7

WAR11860 DMR REPORT (NTU BENCHMARK EXCEEDENCE)

Violations/Triggers

| Violation | Date | Parameter | Units | Fraction | Addressed | Monitoring Point | Value | Benchmark Min | Benchmark Max | Design | Min Limit | Category | Max Limit | Event Category |
|----------------------|------------|--------------------------------------|-------|----------|-----------|------------------|-------|---------------|---------------|--------|-----------|----------------|-----------|----------------------|
| Benchmark Exceedance | 2/24/2025 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 63 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 12/24/2024 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 135 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 12/14/2024 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 117 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 11/17/2024 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 222 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 6/3/2024 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 251 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 3/24/2024 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 414 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 11/7/2023 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 1264 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 11/6/2023 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 1326 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 11/2/2023 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 523 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 3/12/2024 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 569 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 2/28/2024 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 498 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 2/26/2024 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 392 | | 25 | | | Permit Trigger | | Benchmark Exceedance |
| Benchmark Exceedance | 1/25/2024 | Turbidity (Nephelometric) (Measured) | NTU | Measured | N/A | 1 | 31 | | 25 | | | Permit Trigger | | Benchmark Exceedance |