EPA

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	AKR06AC59	170925	-	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 ___ 69	70	71	72	73 ___ 74	75 ___ 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Great Northwest, Inc. - Peat Pit 2920 College Road Fairbanks, AK 99709	9/25/17 12:00PM	4/1/2015
	Exit Time/Date	**Permit Expiration Date**
	9/25/17 3:30PM	3/31/2020

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Anton (Tony) Johansen, Vice President
907-452-5617
Tjohansen@grtnw.com

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

SIC: 1442

Evaluation

Name, Address of Responsible Official/Title/Phone and Fax Number

Anton (Tony) Johansen, Vice President, 907-452-5617
Tjohansen@grtnw.com
PO Box 74646
Fairbanks, AK 99707

Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☑ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☑ Records/Reports	☐ Compliance Schedules	☐ Pollution Prevention	
☑ Facility Site Review	☐ Laboratory	☑ Storm Water	
☑ Effluent/Receiving Waters	☑ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Sandra Brozusky	EPA/OCE 206-553-5317	10/5/17
Joe Roberto	EPA/OCE 206-553-1669	
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
	EPA/OCE/MIREA 3-0955	3/21/18

ICIS. 10/12/17 JJ Bm

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B — EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L — Local Health Department (State)
N — NEIC Inspectors
O— Other Inspectors, Federal/EPA (Specify in Remarks columns)
P— Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

NPDES
Inspection Report

Great Northwest, Inc.
(Peat Pit)

(APDES Permit: AKR06AC59)

Fairbanks, AK

September 25, 2017

Prepared by:

Sandra Brozusky
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Multimedia Inspection and RCRA Enforcement Unit

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(Unless otherwise noted, all details in this inspection report were obtained from conversations with Anton (Tony) Johansen, Rodney Shilling or from observations during the inspection.)

I. Facility Information

Facility Name: Great Northwest, Inc. – Peat Pit (facility; Great Northwest)

Owner: Great Northwest, Inc.

Operator: Great Northwest, Inc.

Facility Contact(s):

Name	Title	Phone Number	Email Address
Anton (Tony) Johansen	Vice President	(907) 452-5617	tjohansen@grtnw.com
Rodney Shilling	Site Superintendent	Cell: 907-322-8884	

Physical Address: 2920 College Road
Fairbanks, AK 99709

Mailing Address: PO Box 74646
Fairbanks, AK 99709

GPS Coordinates: +64.861082°/-147.790184°
(Obtained from Google Earth Maps)

Receiving Water: Noyes Slough

Permit #: AKR06AC59

Number of Employees: There are approximately 3 employees at this location during the open season

Length of Operation: Great Northwest has operated this facility since approximately 1978

Additional Great Northwest Facilities: Based on conversations with Mr. Johansen, Great Northwest, Inc. has additional gravel operations throughout Alaska. In addition, Mr. Johansen stated that the company's principal revenue was generated through road construction projects throughout the state.

II. Inspection Information

Inspection Date(s)	September 25, 2017
Time Arrived	12:00 PM
Time Departed	3:30 PM
Weather Condition	Raining
Facility Representative(s) Present	Anton (Tony) Johansen and Rodney Shilling.
EPA Inspector Present (Inspection Team)	Sandra Brozusky (Lead Inspector) Joe Roberto
Observed Discharge	I did not observe any stormwater discharge during this inspection.

III. Scope of Inspection

The primary focus of this inspection was to conduct a compliance evaluation inspection to determine compliance with the MSGP and Section 402 of the Clean Water Act. For this facility, this meant evaluating the management of stormwater at the site.

In general, this inspection consisted of an opening conference to discuss the purpose and expectations of the inspection, a facility tour to inspect potential stormwater impacted areas, a records review, and a closing conference to discuss the areas of concern identified during the inspection.

I (Sandra Brozusky) did not collect samples at the time of this inspection.

IV. Inspection Entry

Specifics regarding entry at this facility are as follows:

- This was an unannounced inspection.
- I presented credentials to Mr. Shilling and Mr. Johansen upon arriving at the facility.
- I explained to Mr. Johansen that this visit was a compliance inspection to determine compliance with the MSGP and the Clean Water Act.
- Mr. Johansen did not deny us access to the facility.
- Mr. Johansen accompanied us throughout the inspection.
- We were allowed to inspect all areas of the facility we wished to inspect.

V. Compliance History

Date of Last Inspection: According to ADEC records, this facility has never been inspected for compliance with the MSGP.

Enforcement Actions: This facility has not been issued any penalty or compliance orders for purposes of compliance with the MSGP.

VI. Facility Description/Background

Operations at this facility include mining peat. The peat is then blended with imported silt or sand to produce topsoil. This facility sells peat and topsoil to the public from this location.

This facility has a seasonal operation generally from May 1 through September 30, depending on the weather. During operation, the facility has stockpiles of silt, sand and topsoil.

The facility covers approximately 252 acres in total. 30 of these acres were actively being mined or contained material stockpiles at the time of inspection.

VII. Permit Information

At the time of the inspection, the facility was covered under the ADEC MSGP (Permit #AKR06AC59). See Attachment E for a copy of the permit coverage letter dated August 6, 2015 and the Notice of Intent (NOI). The permit became effective April 1, 2015. The NOI submitted by the facility is dated July 30, 2015.

Based on information included in the NOI, this facility had prior MSGP coverage under the MSGP, though the prior permit number is not included on the NOI.

VIII. Permit Applicability and Requirements

The facility's NOI for coverage under the MSGP indicates that the Standard Industrial Classification (SIC) code for the activity conducted at this facility is 1442 (Construction Sand and Gravel). According to Appendix D of the MSGP, facilities that fall under SIC code 1442 are eligible for permit coverage under the MSGP. See Attachment E for a copy of the NOI submitted by this facility for coverage under the MSGP.

Based on the facility's primary SIC code, the facility is subject to sector-specific requirements included in Sector J – Non-Metallic Mineral Mining of the MSGP and specifically Subsector J1.

Coverage under the MSGP means that this facility is responsible for complying with MSGP requirements including the following:

- Prepare a SWPPP to cover stormwater related activities at the facility as established in Part 5 of the MSGP.

- Conduct and document routine facility inspections as established in Part 6.1 of the MSGP. These routine facility inspections must be conducted at least monthly, according to condition 11.J.7. The receiving water, Noyes Slough, is impaired for sediments and as such the routine facility inspection frequency is required monthly.

- Conduct and document a visual assessment of stormwater discharges as established in Part 6.2 of the MSGP. These visual assessments must be conducted quarterly.

- As applicable to specific industrial sectors, conduct quarterly benchmark monitoring as established in Part 7 of the MSGP. Subsector J1 benchmark monitoring requirements include Nitrate plus Nitrite Nitrogen and Total Suspended Solids (TSS).

- Prepare and submit MSGP discharge monitoring reports (MDMRs) which document the results of quarterly benchmark monitoring as established in Part 9.1 of the MSGP.

- Perform corrective actions when conditions established in Part 8 of the MSGP occur.

- Prepare and submit an annual report to ADEC that documents, among other things, the corrective actions conducted during the calendar year as established in Part 8.4 of the MSGP.

These listed permit requirements were the primary focus of the inspection. Where deficiencies were observed, I have documented them in the "Areas of Concern" section of this report.

IX. Facility Tour

During the facility tour, I examined all areas occupied by this facility including the material storage areas, stormwater drainage pathways, mining operations, and the stormwater outfall location. See Attachments A and C for overviews of the facility.

X. Records Review

As part of the inspection, I requested that the following documents be produced for review:

- **NPDES Permit** – At the time of the inspection, Mr. Johansen produced a copy of the MSGP.

- **SWPPP –** At the time of the inspection, Mr. Johansen provided a SWPPP dated July 29, 2015. See Attachment D for a copy of the SWPPP.

- **Routine Facility Inspection Reports –** At the time of inspection, I requested to see routine facility inspection reports since the facility was issued a permit in August 2015. The facility produced the documents as requested.

- **Quarterly Visual Assessment Reports –** At the time of inspection, I requested to see quarterly visual assessment reports since the facility was issued a permit in August 2015. The facility produced the documents as requested.

- **Discharge Monitoring Reports –** At the time of inspection, I requested to see discharge monitoring reports since the facility was issued a permit in August 2015. The facility produced the documents as requested.

- **Annual Reports –** At the time of inspection, I requested to see annual reports for 2015 and 2016. The facility produced the documents as requested.

- **Clearing, Grading and Excavation Activity Inspection Reports as Required under Subpart J -** At the time of inspection, I requested to see these inspection reports since the facility was issued a permit in August 2015. The facility did not have these reports. See the "Areas of Concern" section for more detail.

Note that the review of the above documents was not a comprehensive review designed to identify all deficiencies. Rather, the review of these documents was more cursory in nature.

XI. Stormwater Generation, Treatment and Discharge

The operation of this facility is such that the bulk of the discharge from this facility is stormwater resulting from precipitation falling within the footprint of the facility. Stormwater discharging from the facility is routed to the Noyes Slough.

Small portions of the property, including roadways and material storage areas, have a gravel surface. The remainder of the property has naturally occurring vegetation with particular areas exposed due to excavation and mining activity. The property is relatively flat but graded such that stormwater will sheet flow to an onsite stormwater containment pond or into a series of drainage ditches before discharging offsite.

According to Mr. Johansen and the facility's SWPPP, this facility has one outfall, identified as outfall #1. See Attachment C for a view of the facility's site map, identifying the location of outfall #1. Also see photograph 4 in Attachment B for a view of outfall #1. At this outfall, Mr. Johansen conducts quarterly visual monitoring, quarterly benchmark monitoring (Nitrate plus Nitrite Nitrogen and Total Suspended Solids) and annual effluent limit monitoring (pH). Water samples collected from outfall #1 are delivered to

ARS Aleut Analytical Lab in Fairbanks, except for pH analysis. Analysis of pH is conducted onsite at the time of sample collection.

The follow benchmark sample results were collected at the time of inspection:

Sample Date	Total Suspended Solids Results (mg/L)	Nitrate + Nitrite Nitrogen Results (mg/L)
8/31/15	5.0	< Reporting Limit
9/16/15	6.5	< Reporting Limit
4/2/16	5.5	< Reporting Limit
6/14/16	< Reporting Limit	< Reporting Limit
9/6/16	< Reporting Limit	< Reporting Limit
9/27/16	4.4	< Reporting Limit
5/1/17	Discharge with visual monitoring only. Fulfilled monitoring requirement as the average for the last 4 benchmark values is below the thresholds	
7/16/17	No Discharge	
9/7/17	No Discharge	

Note that the benchmarks for TSS and Nitrate plus Nitrite Nitrogen are 100 mg/L and 0.68 mg/L, respectively.

In addition to benchmark analysis, Mr. Johansen conducted pH analysis for annual effluent limits. Based on my review, these results were within permitted range.

Best management practices used onsite include stormwater containment ponds, where the stormwater is managed through settling, evaporation and infiltration.

XII. Receiving Water

The facility's NOI states that the Noyes Slough is the facility's receiving water. Note that based on EPA and ADEC records, the Noyes Slough is impaired for sediment. In addition, the Noyes Slough has a TMDL for residue and Oil and Grease.

XIII. Area of Concern

At the time of the inspection I identified two areas of concern. Specifically, the concerns at this facility are identified as follows:

A. **<u>Inspection Reports for Clearing, Grading and Excavation Activities</u>**
Condition 11.J.4.14.1 of the MSGP states, "Inspection Frequency. Inspections must be conducted either at least once every 7 calendar days or at least once every 14 calendar days and within 24 hours of the end of a measurable storm event (see Part 7.1.3). If the entire site is temporarily stabilized, inspection frequency may be

reduced to at least once every month and within two business days of the end of a measurable storm event at actively staffed sites which resulted in a discharge from the site (pursuant to 11.J.4.15.2). Once active mining has begun, those areas comply with inspections according to 11.J.7."

Condition 11.J.4.14.3 of the MSGP states, "Location of Inspections. Inspections must include all areas of the site disturbed by clearing, grading, and/or excavation activities and areas used for storage of materials that are exposed to precipitation. Sedimentation and erosion control measures must be observed to ensure proper operation. Discharge locations must be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to waters of the United States, where accessible. Where discharge locations are inaccessible, nearby downstream locations must be inspected to the extent that such inspections are practicable. Locations where vehicles enter or exit the site must be inspected for evidence of significant off-site sediment tracking."

Condition 11.J.4.14.4 of the MSGP states, "Inspection Reports. (See also Part 6.1) For each inspection required above, the permittee must complete an inspection report. At a minimum, the inspection report must include the information required in Part 6.1."

At the time of inspection, I asked Mr. Johansen if the facility conducted inspections during clearing, grading and excavation activities at the frequency required in Subpart J of the MSGP. Mr. Johansen indicated that the facility conducts inspections on a daily basis but has not kept inspection report for these specific activities. At the time of inspection, the facility maintained quarterly facility inspection reports.

Note that I did not collect adequate information at the time of inspection to definitively determine exactly when the facility was conducting clearing, grading or excavation activities since receiving permit coverage.

B. <u>Discharge Sampling for Impaired Water</u>

Condition 7.2.3.1 of the MSGP states, "If a permittee discharges to an impaired water, the permittee must monitor for all pollutants for which the waterbody is impaired and for which a standard analytical method exists (see 40 CFR Part 136). If the pollutant for which the waterbody is impaired is suspended solids, turbidity or sediment/sedimentation, the permittee must monitor for Total Suspended Solids (TSS) and turbidity…"

Condition 7.2.3.2 of the MSGP states, "Beginning in the first full calendar quarter following January 1, 2015 or the permittees date of discharge authorization, whichever date comes later, the permittee must monitor once per year at each outfall (except substantially identical outfalls) discharging storm water to impaired waters without an EPA approved or established TMDL. This monitoring requirement does not apply after one year if the pollutant for which the waterbody

is impaired is not detected above natural background levels in their storm water discharge, and the permittee must document, as required in Part 5.8 (Additional Documentation Requirements), that this pollutant is not expected to be present above natural background levels in the permittees discharge."

Prior to the inspection, I researched if Noyes Slough was impaired for any pollutants. Based on available ADEC and EPA information, the Noyes Slough is impaired for sediment.

At the time of inspection, Mr. Johansen did not know that the Noyes Slough was impaired for sediment, triggering the required annual monitoring. As part of the required benchmark monitoring, the facility completed quarterly TSS sampling and analysis from stormwater discharging through outfall 1 beginning in August 2015 through September 2016. As such, the facility had TSS analysis for 2015 and 2016.

Note that Condition 7.2.3.1 requires that both TSS and turbidity be monitored, however during the closing conference with Mr. Johansen I only highlighted the need for TSS monitoring. On 3/21/18, I left a voicemail for Mr. Johansen stating that permit condition 7.2.3.1 requires both TSS and turbidity analysis. As of the inspection closing conference, the facility had not conducted any monitoring specific to turbidity.

XIV. Closing Conference

Prior to concluding the inspection, I held a closing conference with Mr. Johansen. The purpose of this closing conference was to discuss the preliminary findings of the inspection. I discussed the area of concern listed above and then I thanked him for his time and assistance with the inspection.

Report Completion Date: 3/21/18

Lead Inspector Signature:

Attachment A
Facility Aerial Image

Great Northwest, Inc. – Peat Pit

Great Northwest Inc. – Peat Pit

Attachment B
Photograph Documentation

Great Northwest Inc. – Peat Pit

All photographs were taken by Sandra Brozusky using a Nikon Coolpix AW130

1. Overview of a pond at the facility that collects stormwater as a best management practice. This pond does not discharge according to facility representatives. (DSCN0523.jpg)

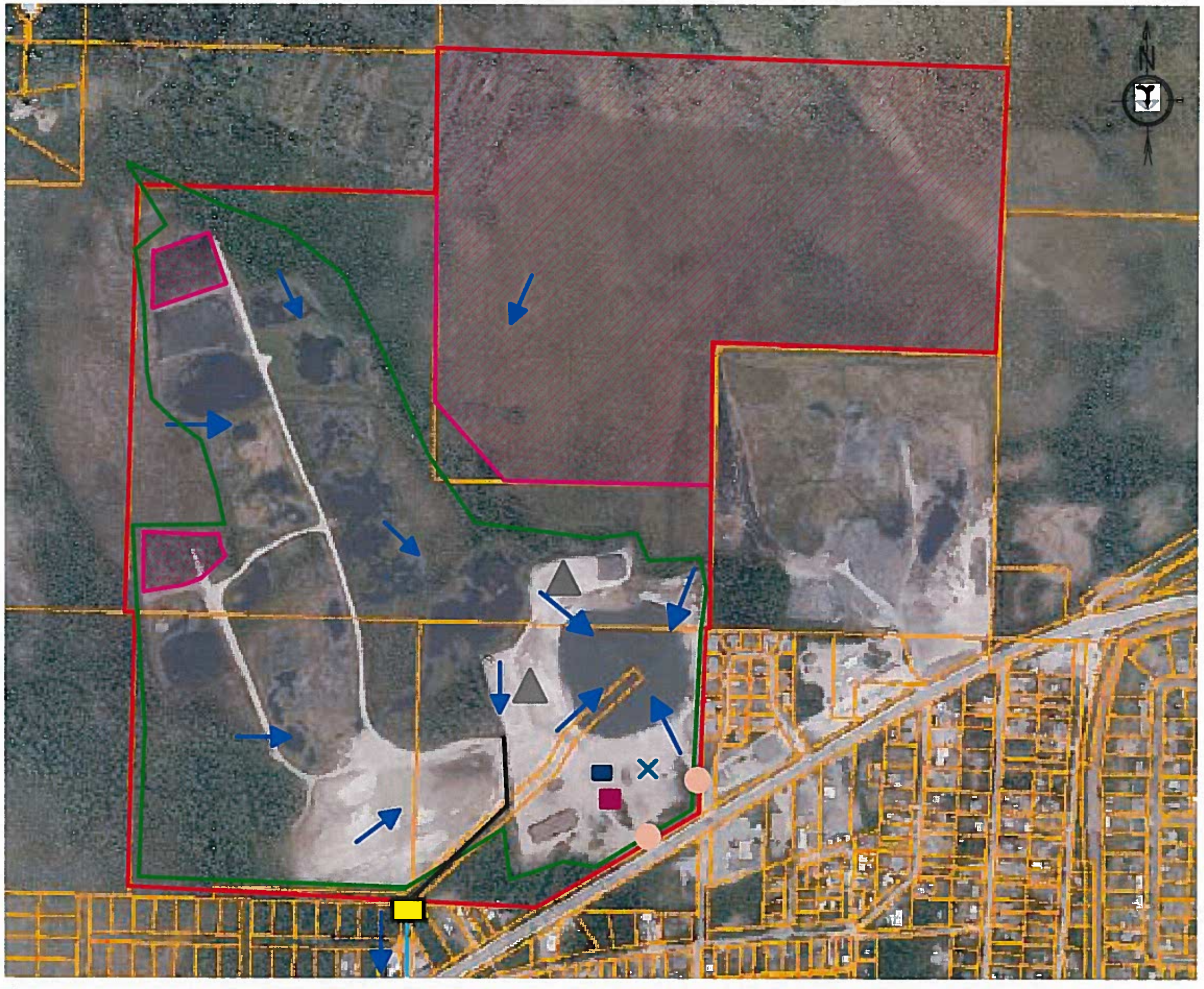
2. View of an area with active peat mining. Stormwater and groundwater from this area will be pumped to the depression seen in the next photograph. (DSCN0525.jpg)

3. View of the area where stormwater and groundwater from active peat mining activity is routed. This area does not have a surface water discharge. (DSCN0526.jpg)

4. View of outfall 1, prior to being routed into stormwater conveyance off the facility's property. Stormwater monitoring samples will be collected just prior to water entering the culvert. We did not see a stormwater discharge at the time of inspection. (DSCN0527.jpg)

Attachment C
SWPPP Site Map

Great Northwest Inc. – Peat Pit



Notes

1. The size of the property is 252 acres.
2. The significant structures on the property include the office which is depicted on the site map.
3. The direction of storm water flow is depicted on the site map.
4. The existing structural control measures include grading the site to drain to the settling ponds and utilization of the existing well established vegetation buffer depicted on the site map.
5. Receiving waters for this site include reclaimed excavation ponds (considered jurisdictional wetlands) during spring break up, Noyes Slough, and the Chena River. Noyes Slough is imparied for debris.
6. Storm water conveyances on the property include a ditch and culvert which are depicted on the site map.
7. Locations of potential pollutant sources are outline in Section 2.1 of the SWPPP.
8. No significant spilled or leaks have occurred at the facility.
9. Stormwater monitoring is at Outfall #1 which is depicted on the site map.
10. Outfall #1 is (depicted on the map) is the only outfall associated with the facility.
11. MS4 storm systems onsite include the ditch line (depicted on the map). From the ditch line water discharges to a culvert (depicted on the map).
12. There are no non-storm water discharges (aside from those authorized by the permit) associated with the facility.
13. None of the following activities are located onsite:
    - Vehicle and equipment maintenance and/or cleaning areas; and
    - Processing and storage areas.
14. The fueling area and liquid storage tanks are depicted on the site map.
15. Immediate access roads to the facility include College Road.
16. Storage and processing areas are depicted on the site map.
17. Transfer areas for substances in bulk occur in the storage area.
18. Machinery is used through the site, but is stored in the storage and/or processing area.
19. There are no sources of run-on to the facility from adjacent properties that contain significant quantities of pollutants.

Legend

- Active Mining
- Vegetation Buffer
- Future Mining
- Ditch Line
- Office
- Culvert
- Outfall #1
- Storage Area
- Fueling and Liquid Storage Tanks
- Process Area
- Entrance/Exit
- Surface Flow Direction

TRAVIS/PETERSON ENVIRONMENTAL CONSULTING, INC. 329 2ND STREET FAIRBANKS, ALASKA 99701	**GREAT NORTHWEST, INC.** **PEAT PIT MSGP**	**FIGURE 2** **SITE MAP**

PROJECT NO: 1008-39	**FILE: PROJECTS/1008/39/ATTACHMENTS/B/FIGURE 2.SKF**	**DATE: 07/30/2015**	**SCALE: AS SHOWN**

Attachment D
Stormwater Pollution Prevention Plan

Great Northwest Inc. – Peat Pit

MULTI-SECTOR GENERAL PERMIT
STORM WATER POLLUTION PREVENTION PLAN

Prepared for:

Peat Pit
2920 College Road
Fairbanks, Alaska 99709
(907) 479-0410

SWPPP Contact(s):

Great Northwest, Inc.
Anton K. Johansen
2975 Van Horn Road
Fairbanks, Alaska 99707
(907) 452-5617
tjohansen@grtnw.com

SWPPP Preparation Date:

07/29/2015

MSGP Tracking Number:_____

Prepared by:

Travis/Peterson
Environmental Consulting, Inc.

TRAVIS/PETERSON ENVIRONMENTAL CONSULTING, INC.
329 2nd Street
Fairbanks, Alaska 99701

3505 Arctic Blvd., Suite 102
Anchorage, Alaska 99503

Project Number
1008-39

REVISION LOG

Date of Revision	Section	Description

SWPPP PURPOSE AND CONTENTS

This Storm Water Pollution Prevention Plan (SWPPP) for the Peat Pit facility was developed in accordance with the Alaska Department of Environmental Conservation (ADEC), Wastewater Discharge Authorization Program, Multi-Sector General Permit for Storm Water Discharge Associated with Industrial Activity (MSGP) permit number AKR060000 (Attachment C). This general permit covers waters of the United States located in the State of Alaska, except for the Indian Reservation of Metlakatla and the Denali National Park & Preserve. MSGP AKR060000 became effective April 1, 2015 under Alaska Statute 46.03.

The ADEC was granted primacy by the United Stated Environmental Protection Agency (EPA) and assumed authority of the permit in accordance with 18 AAC 83 on October 31, 2009. This permit complies with the Clean Water Act, 33 U.S.C. 1251 *et seq.*, as amended by the Water Quality Act of 1987, P.L. 100-4 (CWA).

A SWPPP includes the following elements:

- An assessment and description of existing and potential pollutant sources;
- A site map showing storm water drainage and drainage areas, discharge structures, paved areas and buildings, and areas where storm water could potentially contact pollutants and surface water bodies;
- A list of pollutants that are or have a reasonable potential to be present in storm water discharges in significant amounts; and
- A description of the Best Management Practices (BMPs) that have been or will be implemented to reduce the potential for discharge of significant amounts of pollutants, including operational control and source control BMPs.

BMPs are the physical, structural, operational, or administrative means of providing the appropriate controls. Operational BMPs consist of company policies, operating and maintenance procedures, personnel training, good housekeeping, prohibitions of undesirable practices, and other administrative practices to prevent or reduce pollution of waters of the United States. Source control BMPs are physical, structural, or mechanical devices or structures that are intended to prevent pollutants from entering storm water.

The ADEC administers the Alaska Pollutant Discharge Elimination System (APDES) program in Alaska. This SWPPP was developed in accordance with the requirements of 40 CFR Part 419 and the goals of the EPA guidance manual.

The SWPPP will be amended whenever there is a change in design, construction, operation, or maintenance at the facility that could have an effect on the discharge of pollutants to waters of the United States. All changes that occur to the plan or the figures will be recorded in the Revisions Log on Page ii of this SWPPP.

A copy of this SWPPP and all appendices will be retained at the facility. It will be available for the ADEC or appropriate regulating agencies. If a member of the public makes a request in writing, the SWPPP will be made available for review. Confidential Business Information (CBI) may not be withheld from regulatory agencies, but may be withheld from the public. All portions of the SWPPP not considered CBI must be provided to the public when requested.

If this SWPPP is considered to be inadequate by the ADEC, it will be modified within 7 calendar days of ADEC inspection or notification by the owner or document preparer.

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Attachment L Annual Report Form
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Attachment N Corrective Action Documentation

1.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

Sections 1.1 through 1.6 of this SWPPP provide a description of the facility along with pertinent contact information.

1.1 FACILITY INFORMATION

The information contained in this Section will be used to complete the Notice of Intent (NOI) for the Peat Pit facility. A copy of the NOI form along with a NOI modification form (if needed) is included in Attachment C of this SWPPP. A copy of the ADEC approved NOI will be placed in Attachment C of this SWPPP once received by the Peat Pit facility.

Facility Information

Name of Facility: Peat Pit
Street: 2920 College Road
City: Fairbanks State: AK ZIP Code: 99709
County or Similar Subdivision: Fairbanks North Star Borough
Permit Tracking Number: AKR05CG09 (if covered under a previous permit)
Latitude/Longitude in Decimal Degrees
Latitude: 64.8591 ° North Latitude
Longitude: 147.7255 ° W Longitude
Method for determining latitude/longitude (check one):
☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS
☒ Other (please specify): Previous MSGP SWPPP
Is the facility located in Indian Country? ☐ Yes ☒ No
If yes, name of Reservation, or if not part of a Reservation, indicate "not applicable (NA)." NA
Is this facility considered a Federal Facility? ☐ Yes ☒ No
Estimated area of industrial activity at site exposed to storm water: 140 (acres)

Discharge Information

Does this facility discharge storm water into an MS4? ☒ Yes ☐ No
If yes, name of MS4 operator: Fairbanks North Star Borough Permit Number AKS053414FP
Name(s) of water(s) that receive storm water from your facility Reclaimed excavation ponds (considered jurisdictional wetlands) during spring break up. Noyes Slough, and the Chena River.
Are any of your discharges directly into any segment of an "impaired" water?
☒ Yes ☐ No
If Yes, identify name of the impaired water (and segment, if applicable): Noyes Slough
Identify the pollutant(s) causing the impairment: Residues in water
For pollutants identified, which do you have reason to believe will be present in your discharge? None
For pollutants identified, which have a completed TMDL? Residues in water
Do you discharge into a receiving water designated as a Tier 2 (or Tier 2.5) water?
☐ Yes ☒ No
Are any of your storm water discharges subject to effluent guidelines? ☒ Yes ☐ No
If Yes, which guidelines apply? Sector J guidelines apply (see Section 2.1)
Primary SIC Code or 2-letter Activity Code: 1442
(refer to Appendix D of the 2015 MSGP)
Identify your applicable sector and subsector: Sector J – Subsector Sector J1

1.2 CONTACT INFORMATION/RESPONSIBLE PARTIES

The information contained in this Section will be used to complete the Notice of Intent (NOI) for the Peat Pit facility. A copy of the NOI form along with a NOI modification form (if needed) is included in Attachment C of this SWPPP. A copy of the ADEC approved NOI will be placed in Attachment C of this SWPPP once received by the Peat Pit facility.

Facility Operator:
Name: Great Northwest, Inc.
Address: P.O. Box 74646
City, State, Zip Code: Fairbanks, Alaska 99707
Telephone Number: 907-452-5617
Email Address: tjohansen@grtnw.com
Fax Number: 907-456-7779

Facility Owner:
Name: Great Northwest, Inc.
Address: P.O. Box 74646
City, State, Zip Code: Fairbanks, Alaska 99707
Telephone Number: 907-452-5617
Email Address: tjohansen@grtnw.com
Fax Number: 907-456-7779
Property Ownership: The University of Alaska Fairbanks is the property owner; Great Northwest, Inc. is the lessee.

SWPPP Contact:
Name: Anton K. Johansen
Telephone number: 907-347-2437
Email Address: tjohansen@grtnw.com
Fax Number: 907-452-5617

1.3 STORM WATER POLLUTION PREVENTION TEAM

The storm water pollution prevention team is responsible for assisting the facility manager in developing and revising the facility's SWPPP, implementing and maintaining control measures/BMPs, and taking corrective actions where required. Each member of the storm water pollution prevention team must have ready access to either an electronic or paper copy of applicable portions of the MSGP and this SWPPP.

Staff Names	Individual Responsibilities
Anton K. Johansen	Facility Manager, responsible for site inspection and SWPPP.
Rodney Shilling	Site Superintendent, responsible for maintenance of BMPs, tracking rainfall and educating site employees regarding the SWPPP
Edmond C. Packee Jr.	SWPPP Preparer

1.4 ACTIVITIES AT THE FACILITY

The industrial activities performed at the Peat Pit facility include mining peat, silt, and gravel from the Peat Pit located at 2920 College Road. The material is then stockpiled on-site; the gravel is sold as pit run or used on-site. The peat is then shredded and sold as peat or combined with silt to be sold as topsoil or used in landscaping applications. The material site is excavated by removing the overburden with dozers then removing the peat in lifts and stockpiling the material. Silt is excavated in a similar manner. Topsoil is then manufactured for various applications and stockpiled on-site.

1.5 GENERAL LOCATION MAP

A general location and vicinity map for this facility is provided in Attachment A.

1.6 SITE MAP(S)

The site map(s) for this facility are included in Attachment B and include the following:

- The size of the property in acres;
- The location and extent of significant structures;
- Directions of storm water flow (arrows);
- Locations of all existing structural control measures;
- Locations of all receiving waters in the immediate vicinity of your facility, indicating if any of the waters are impaired;
- Locations of all storm water conveyances including ditches, pipes, and swales;
- Locations of potential pollutant sources identified under MSGP, Part 5.2.4.2;
- Locations where significant spills or leaks identified under MSGP, Part 5.2.4.3 have occurred;
- Locations of all storm water monitoring points;
- Locations of storm water inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc), indicating if one or more outfalls are to be treated as "substantially identical" under MSGP, Parts 6.2.3, 5.2.6.2, and 7.1.1, and an approximate outline of the areas draining to each outfall;
- Municipal separate storm sewer systems, where your storm water discharges to them;
- Locations and descriptions of all non-storm water discharges identified under MSGP, Part 4.2.10;
- Locations of the following activities where such activities are exposed to precipitation:
  - Fueling stations;
  - Vehicle and equipment maintenance and/or cleaning areas;
  - Liquid storage tanks;
  - Processing and storage areas;
  - Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
  - Transfer areas for substances in bulk;
  - Machinery; and
- Locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants.

2.0 POTENTIAL POLLUTANT SOURCES

Sections 2.1 through 2.5 of this SWPPP describe the areas of the facility where industrial materials or activities are exposed to storm water or from which allowable non-storm water discharges are released.

2.1 INDUSTRIAL ACTIVITY AND ASSOCIATED POLLUTANTS

The following is a list of industrial activities exposed to storm water and the pollutants associated with these activities. All significant materials that have been handled, treated, stored, or disposed and exposed to storm water in the three years prior to SWPPP preparation are included below.

Industrial Activity	Associated Pollutants
Site Preparation	Dust, total suspended solids (TSS), total dissolved solids (TDS), and turbidity.
Mineral Extraction	Dust and TSS.
Mineral Processing Activities	Dust, TSS, TDS, turbidity, fines, and pH.
Equipment/Vehicle Maintenance	Diesel/gas fuel, oil, solvents, heavy metals, acid/alkaline wastes, acid, arsenic, lead, cadmium, chromium, benzene, 1,1,1-trichloroethane, tetrachlorethylene, polyaromatic hydrocarbons, and solvents.
Reclamation Activities	Dust, TSS, TDS, turbidity, nitrogen, and phosphorus.
Other	TSS, TDS, dust, turbidity, and pH.

2.2 SPILLS AND LEAKS

Significant spills and leaks include, but are not limited to, releases of oil or hazardous substances in excess of quantities that are reportable under CWA Section 311 (see 40 CFR 110.6 and 40 CFR 117.21) or Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC §9602.

No past spills of reportable quantity have occurred at the Peat Pit facility.

The following table outlines the locations of the site where potential spills/leaks could occur and the corresponding outfall that would be impacted.

Location	Outfalls
Equipment Fueling	Outfall #1
Topsoil Shredder	Outfall #1

If a spill does occur at the Peat Pit facility, the spill will be documented on a spill log included in Attachment D. Additionally, any information pertaining to a spill will be included in Attachment D. See Section 3.4 of this SWPPP for information regarding spill prevention and response at the Peat Pit facility.

2.3 NON-STORM WATER DISCHARGES DOCUMENTATION

The following pertains to the evaluation of non-storm water discharges at the facility and the elimination of any unauthorized non-storm water discharges in accordance with MSGP Part 5.2.4.4.

Date of Any Evaluation: July 10, 2015
Description of the Evaluation Criteria Used: Visual Inspection
Outfalls or Onsite Drainage Points Directly Observed During Evaluation: Outfall #1
Non-storm Water Discharge(s) and Source Locations: None Observed
The Action(s) Taken to Eliminate Unauthorized Discharge(s), if any Were Identified: No Unauthorized Discharges Were Observed

2.4 SALT STORAGE

There are no storage piles containing salt used for deicing or other commercial or industrial purposes at the Peat Pit facility.

2.5 SAMPLING DATA SUMMARY

See Attachment E for previous storm water discharge sampling data for the Peat Pit facility.

3.0 STORM WATER CONTROL MEASURES

Sections 3.1 through 3.12 of this SWPPP describe storm water control measures installed to meet each of the MSGP's "non-numeric effluent limits" as described in Part 4.2 of the MSGP. Sector specific "non-numeric effluent limits" are discussed in Section 3.8 of this SWPPP.

The development of the housekeeping measures and BMPs explained in the following sections were developed in accordance with EPA's Storm Water Management for Industrial Sites: Developing Pollution Prevention Plans and Best Management Practices. Storm water control measures are identified on the site maps in Attachment B. BMP specifications are also included in Attachment B.

3.1 MINIMIZE EXPOSURE

Storm water exposure of industrial activities to rain, snow, snowmelt, and runoff is minimized at the Peat Pit by limiting disturbed area and sloping work and material storage pads to drain towards the settling ponds. Land is only disturbed if it will be utilized as an essential part of the operation.

3.2 GOOD HOUSEKEEPING

The intent of good housekeeping is to maintain a clean and orderly work environment, which in turn reduces the probability of accidental spills caused by mishandling of equipment and materials. Good housekeeping, therefore, is considered an effective first step in preventing the pollution of storm water.

Waste Disposal
Waste materials will be collected and stored in securely lidded containers. Containers will be emptied at regular intervals and the contents disposed of in accordance with state and federal guidelines. Personnel will be instructed regarding the correct procedure for waste disposal. The superintendent managing the day-to-day site operations will be responsible for seeing that these procedures are followed. A lidded dumpster is available for garbage disposal at the shop.

Sanitary Waste
Sanitary waste will be collected by using portable toilets throughout the site. Toilets will be pumped regularly, and the waste disposed of in compliance with state and federal guidelines.

3.3 MAINTENANCE

Preventive maintenance involves the inspection and maintenance of equipment and systems to uncover conditions that could cause breakdowns, and correction of these conditions by adjustment, repair, or replacement of worn parts before the equipment or systems fail. One goal of a preventive maintenance program is to discover conditions that could result in discharge of pollutants to storm water. A Maintenance Log is included in Attachment F.

Equipment Maintenance
Equipment will be maintained at regular intervals as determined by the shop mechanics. Equipment is to be kept in proper working order. Equipment is oiled on-site by a mobile service truck. Regular or more extensive equipment maintenance will be performed separately, off-site.

3.4 SPILL PREVENTION AND RESPONSE

Spills will be minimized and avoided by utilizing well trained fueling and oiling personnel with trucks equipped with diapers. Fuels and contaminants will be stored in properly labels containers away from water to minimize exposure. Equipment will be fueled on-site with mobile fuel trucks. Spills will be properly controlled and cleaned up in a manner that complies with federal and state laws and guidelines. It is Great Northwest, Inc. policy to notify supervising personnel immediately upon discovery of a spill or leak. A spill response kit is readily available and is located on-site; personnel are available and trained in its use.

Any reportable spill will be reported per ADEC requirements. ADEC 24 hour spill reporting number is 907-451-2121 or 1-800-478-9300. The National Response Center (NRC) at 1-800-424-8802 and the EPA Region 10 will also be notified. If a spill does occur at the Peat Pit facility, the spill will be documented on a spill log included in Attachment D. Additionally, any information pertaining to a spill will be included in Attachment D.

EPA Region 10
Office of Water and Watersheds OWW-193
Storm Water Coordinator
1200 6th Avenue
Seattle, WA 98101

3.5 EROSION AND SEDIMENT CONTROLS

The topography of the Peat Pit consists of relatively flat low-lying areas with a low runoff potential. Erosion and sediment controls consist of a well-established vegetative buffer that surrounds the site on all sides. Erosion and sediment controls also consist of the site being graded to drain toward the settling ponds located near the center of the site, thus removing sediment from the water and retaining it on-site. Storm water runoff is further controlled through evaporation and percolation.

3.6 MANAGEMENT OF RUNOFF

The well-established vegetative buffer that surrounds the Pear Pit on all sides retains storm water runoff on-site. Storm water runoff is further managed by the site being graded to drain toward the settling ponds located near the center of the project, thus removing sediment from the water and retaining it on-site. Storm water runoff is further managed through evaporation and percolation.

3.7 SALT STORAGE PILES OR PILES CONTAINING SALT

There are no storage piles containing salt used for deicing or other commercial or industrial purposes at the Peat Pit facility.

3.8 MSGP SECTOR-SPECIFIC NON-NUMERIC EFFLUENT LIMITS

Non-numeric effluent limits which are specific to Sector J and apply to the Peak Pit facility are detailed in Parts 11.J.4 and 11.J.5 of the MSGP (Attachment C).

3.9 EMPLOYEE TRAINING

Employees working within the Peat Pit will be trained in good housekeeping methods, material management practices, storm water runoff management and spill response. Employees responsible for the implementation of the site's SWPPP will receive training specific to the SWPPP. All training will be conducted in May at the beginning of each construction season.

Employee training will be documented and records will be located in Attachment G.

3.10 NON-STORM WATER DISCHARGES

The following are non-storm water discharges authorized under the MSGP permit:

- Discharges from fire-fighting activities;
- Fire hydrant flushings;
- Potable water, including water line flushings;
- Uncontaminated condensate from air conditioners, coolers, and other compressors and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling;
- Pavement wash waters where no detergents or hazardous cleaning products are used (e.g., bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols), and the wash

waters do not come into contact with oil and grease deposits or any other toxic or hazardous materials (unless cleaned up using dry clean-up methods). The permittee is prohibited from directing any authorized pavement wash waters directly into any surface water or storm drain inlet unless the permittee has implemented appropriate control measures that meet the non-numeric effluent limits in MSGP Part 4.2. Where appropriate control measures are not in place, wash water runoff must first undergo treatment prior to discharge such as filtration, detention, or settlement;

- Wheel wash water that does not use detergents;
- Routine external building washdown / power washwater that does not use detergents or hazardous cleaning products, (such as those containing bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols);
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials;
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but not intentional discharges from the cooling tower (e.g., "piped" cooling tower blowdown or drains);
- Discharges from the spray down of lumber and wood product storage yards where no chemical additives are used in the spray-down waters and no chemicals are applied to the wood during storage (applicable only to Sector A facilities provided the non-storm water component of the discharge is in compliance with the non-numeric effluent limits requirements in MSGP Part 4.2).

The Peat Pit facility will eliminate non-storm water discharges not authorized by the MSGP. If inspection (Section 5.0) or monitoring (Section 4.0) indicates that unauthorized discharges are occurring, the facility operator shall:

1. Immediately stop the unauthorized discharge if possible;
2. Identify measures to prevent the unauthorized discharge from comingling with storm water or permissible discharges under the APDES MSGP; and
3. Either eliminate the discharge or permit the unauthorized discharge under the appropriate APDES permit for the unauthorized discharge.

3.11 WASTE, GARBAGE AND FLOATABLE DEBRIS

Waste materials will be collected and stored in securely lidded containers. Containers will be emptied at regular intervals and the contents disposed of in accordance with state and federal guidelines. Personnel will be instructed regarding the correct procedure for waste disposal. The superintendent managing day-to-day site operations will be responsible for seeing that these procedures are followed. A lidded dumpster is available for garbage disposal at the shop.

3.12 DUST GENERATION AND VEHICLE TRACKING OF INDUSTRIAL MATERIALS

The following described dust generation and vehicle tracking on industrial materials at the Peat Pit facility.

Dust Generation
Dust generation will be mitigated through the use of water trucks and/or fat cat to apply water to the surface of roads and pads. Pit roads and pads are located throughout the facility. Water for dust control will be controlled through evaporation and percolation.

Offsite Vehicle Tracking
Off site tracking has not been observed from the facility. If encountered, a stabilized construction exit may be provided to help minimize vehicle tracking of sediments. The entrance will consist of a 50-foot run of granular material. It is no anticipated that vehicle tracking will be a problem on the site. If vehicle tracking is encountered pit entrances/exits will be swept to alleviate this issue. If additional vehicle tracking measures are required trucks will be washed of sediment to alleviate this issue. Truck washing water runoff will be managed through evaporation and percolation.

4.0 SCHEDULES AND PROCEDURES FOR MONITORING

The following sections describe the monitoring required of the Peat Pit facility by the MSGP Permit.

4.1 BENCHMARK MONITORING

The Peat Pit facility will monitor for the benchmark parameters specified for the Sector J as outlined in the following table.

Sample Location(s)	Pollutant Parameters to be Sampled	Numeric Limitations
Outfall #1	Nitrate plus Nitrite Nitrogen	0.68 mg/L
	TSS	100 mg/L

TSS – Total Suspended Solids; mg/L – milligrams per liter.

Monitoring Schedule
Benchmark monitoring must be conducted quarterly, as identified below, for the Peat Pit facility's first four full quarters of permit coverage commencing no earlier than July 1, 2015.

- Quarter 1: January 1 - March 31;
- Quarter 2: April 1 – June 30;
- Quarter 3: July 1 – September 30;
- Quarter 4: October 1 – December 31.

Procedures
When possible, the same individual will carry out the monitoring procedures. Samples will be gathered per the independent text laboratory's instructions. Samples must be analyzed consistent with 40 CFR Part 136 analytical methods and using test procedures with quantitation limits at or below benchmark values for all benchmark parameters for which the permittee is required to sample.

Data Not Exceeding Benchmarks
After collection of four quarterly samples, if the average of the four monitoring values for any parameter does not exceed the benchmark, the permittee has fulfilled their monitoring

requirements for that parameter for the permit term. For averaging purposes, use a value of zero for any individual sample parameter, analyzed using procedures consistent with MSGP Part 7.2.1.1, which is determined to be less than the method detection limit. For sample values that fall between the method detection level and the quantitation limit (i.e., a confirmed detection but below the level that can be reliably quantified), use a value halfway between zero and the quantitation limit.

Data Exceeding Benchmarks

After collection of four quarterly samples, if the average of the four monitoring values for any parameter exceeds the benchmark, the permittee must, in accordance with Part 8.2, review the selection, design, installation, and implementation of their control measures to determine if modifications are necessary to meet the benchmarks in this permit, and either:

- Make the necessary modifications and continue quarterly monitoring until the permittee has completed four additional quarters of monitoring for which the average does not exceed the benchmark; or
- Make a determination that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice to meet the technology-based effluent limits or are necessary to meet the water-quality-based effluent limitations in Part 3 of this permit, in which case the permittee must continue monitoring once per year. The permittee must also document their rationale for concluding that no further pollutant reductions are achievable, and retain all records related to this documentation with their SWPPP. The permittee must also notify ADEC of this determination in their next MSGP Discharge Monitoring Report (MDMR).

In accordance with Part 8.2, the permittee must review its control measures and perform any required corrective action immediately (or document why no corrective action is required), without waiting for the full four quarters of monitoring data, if an exceedance of the four quarter average is mathematically certain. If after modifying the permittees control measures and conducting four additional quarters of monitoring, their average still exceeds the benchmark (or if an exceedance of the benchmark by the four quarter average is mathematically certain prior to conducting the full four additional quarters of monitoring), the permittee must again review its control measures and take one of the two actions above.

A copy of a Benchmark Exceedance Form in included in Attachment I.

Inactive and Unstaffed Sites Exception

The requirement for benchmark monitoring does not apply at the Peat Pit facility as it experiences times when it is inactive and unstaffed. At such times, no industrial materials or activities will be exposed to storm water. To invoke this exception, the Peat Pit facility must do the following:

- Maintain a statement onsite with this SWPPP stating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to storm water in accordance with the substantive requirements in 40 CFR 122.26(g) and sign and certify the statement in accordance with Appendix A, Subsection 1.12 of the MSGP Permit. A copy of an Active/Inactive Status Change Form is included in Attachment H; and

- If circumstances change and industrial materials or activities become exposed to storm water or the facility becomes active and/or staffed, this exception no longer applies and the permittee must immediately begin complying with the applicable benchmark monitoring requirements under Part 7.2 of the MSGP as if they were in their first year of permit coverage. The Peat Pit facility must indicate in their first MDMR that their facility has materials or activities exposed to storm water or has become active and/or staffed.

Substantially Identical Outfall Exception
The substantially identical outfall exception does not apply to the Peat Pit facility as this facility has only one outfall.

Reporting Monitoring Data
All benchmark monitoring data is to be included in Attachment I as it is received by the laboratory. All benchmark monitoring data collected must be submitted to ADEC no later than 30 days (email date or postmark date) after the permittee has received the complete laboratory results for all monitored outfalls for the reporting period. A copy of the MDMR ADEC requires is included in Attachment I. Paper reporting forms must be submitted by the deadline to the address identified below.

State of Alaska
Department of Environmental Conservation
Division of Water
Compliance and Enforcement Program
555 Cordova Street
Anchorage, Alaska 99501
Telephone Nationwide (877) 569-4114
Anchorage Area / International (907) 269-4114
Fax (907) 269-4604
Email: dec-wqreporting@alaska.gov

For benchmark monitoring, note that the permittee is required to submit sampling results to ADEC no later than 30 days after receiving laboratory results for each quarter that are required to collect benchmark samples, in accordance with MSGP Part 7.2.1.2. If a permittee collects multiple samples in a single quarter (e.g., due to adverse weather conditions, climates with irregular storm water runoff, or areas subject to snow), they are required to submit all sampling results to ADEC within 30 days of receiving the laboratory results. If no discharge occurs during the benchmark monitoring period, the permittee must still report no discharge for this monitoring period.

4.2 EFFLUENT LIMITATIONS GUIDELINES

The following table identifies the storm water discharges subject to effluent limitation guidelines for Sector J that is authorized for coverage under the MSGP permit.

Sample Location(s)	Pollutant Parameters to be Sampled	Numeric Limitations
Outfall #1	pH	6.5-8.5

Monitoring Schedule
Beginning in the first full quarter following January 1, 2015 or the Peat Pit facility's date of discharge authorization, whichever date comes later, the Peat Pit facility must monitor once per year at each outfall containing the discharges identified in the above table.

Procedures
When possible, the same individual will carry out the monitoring procedures. Samples will be gathered per the independent text laboratory's instructions. Samples must be analyzed consistent with 40 CFR Part 136 analytical methods and using test procedures with quantitation limits at or below benchmark values for all benchmark parameters for which the permittee is required to sample.

Follow-up Actions if Discharge Exceeds Numeric Effluent Limit
The Peat Pit must follow-up monitoring within 30 calendar days (or during the next qualifying runoff event, should none occur within 30 days) of implementing corrective action(s) taken pursuant to MSGP Part 4 in response to exceedance of a numeric effluent limit contained in the table above. Monitoring must be performed for any pollutant(s) that exceeds the effluent limit. If this follow-up monitoring exceeds the applicable effluent limitation, you must:

- Submit a Noncompliance Notification Form – The Peat Pit facility must submit an Noncompliance Notification Form (included in Attachment J) no later than 30 days after you have received the lab result; and
- Continue to Monitor – The Peat Pit facility must monitor, at least quarterly, until the discharge is in compliance with the effluent limit or until ADEC waives the requirement for additional monitoring.

Inactive and Unstaffed Sites Exception
The inactive and unstaffed sites exception is not applicable for numeric effluent limits monitoring.

Substantially Identical Outfall Exception
The substantially identical outfall monitoring provisions are not available for numeric effluent limits monitoring.

4.3 IMPAIRED WATERS MONITORING

Although the Peat Pit facility discharges to Noyes Slough, an impaired water body for debris, no monitoring of the impaired water body is required as no standard analytical method exists for debris (per Part 7.2.3.1 of the MSGP).

4.4 OTHER MONITORING AS REQUIRED BY ADEC

ADEC may notify the Peat Pit facility of additional discharge monitoring requirements. Any such notice will briefly state the reasons for the monitoring, locations, and parameters to be monitored, frequency and period of monitoring, sample types, and reporting requirements.

5.0 INSPECTIONS

The following sections describe the inspections required of the Peat Pit facility by the MSGP Permit.

5.1 ROUTINE FACILITY INSPECTIONS

During normal facility operating hours, the Peat Pit facility will conduct routine facility inspections of areas of the facility covered by the requirements in the MSGP permit as follows.

Person(s) Conducting the Inspections
Anton K. Johansen

Schedule for Conducting Inspections
Inspections will be conducted at least quarterly (i.e., once each permit quarter), or in some instances more frequently (e.g., monthly), as appropriate. Increased frequency may be appropriate for some types of equipment, processes and storm water control measures, or areas of the facility with significant activities and materials exposed to storm water. At least one of the routine inspections must be conducted during a period when a storm water discharge is occurring (in arid areas of the state this requirement is to be met as practicable).

Specific Areas of the Facility to be Inspected

- Areas where industrial materials or activities are exposed to storm water;
- Areas identified in the SWPPP and those that are potential pollutant sources;
- Areas where spills and leaks have occurred in the past 3 years;
- Discharge points; and
- Control measures used to comply with the effluent limits outlined in Section 4.0 of this SWPPP.

Items to be Examined During Inspection

- Industrial materials, residue or trash that may have or could come into contact with storm water;
- Leaks or spills from industrial equipment, drums, tanks and other containers;
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site;
- Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas; and
- Control measures needing replacement, maintenance or repair.

Documentation
A permittee must document the findings of each routine facility inspection and maintain this documentation onsite with the SWPPP. The permittee is not required to submit the routine facility inspection findings to ADEC, unless specifically requested to do so. Routine Facility Inspection Reports are included in Attachment K.

Exceptions to Routine Facility Inspections
The requirement to conduct routine facility inspections on a quarterly basis does not apply at a facility that is inactive and unstaffed, as long as there are no industrial materials or activities exposed to storm water. Such a facility is only required to conduct an annual comprehensive site inspection in accordance with the requirements of Part 6.3. To invoke this exception, the permittee must maintain a statement in the SWPPP pursuant to Part 5.2.6.2 indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii). The statement must be signed and certified in accordance with Appendix A, Subsection 1.12.

If circumstances change and industrial materials or activities become exposed to storm water or the facility becomes active and/or staffed, this exception no longer applies and the permittee must immediately resume quarterly facility inspections. If the permittee is not qualified for this exception at the time of authorization under this permit, but during the permit term becomes qualified because their facility is inactive and unstaffed, and there are no industrial materials or activities that are exposed to storm water, then the permittee must include the same signed and certified statement as above and retain it with the facility records pursuant to MSGP Part 5.8.

5.2 COMPREHENSIVE SITE INSPECTIONS

The Peat Pit facility will conduct annual comprehensive site inspections while covered by the requirements in the MSGP permit as follows.

Person(s) Conducting the Inspections
Anton K. Johansen

Schedule for Conducting Inspections
Inspections will be conducted annually while covered under this permit. Annual, as defined in MSGP Part 6.3.1, means once during each of the following inspection periods beginning with the period the permittee is authorized to discharge under this permit:

- Year 1: Permit Effective Date – December 31, 2015
- Year 2: January 1, 2016 – December 31, 2016
- Year 3: January 1, 2017 – December 31, 2017
- Year 4: January 1, 2018 – December 31, 2018
- Year 5: January 1, 2019 – Permit Expiration Date (Unless the permit is extended to or past December 31, 2019, in which case, December 31, 2019.)

A permittee is waived from having to perform a comprehensive site inspection for an inspection period, as defined above, if authorization to discharge is obtained less than three months before the end of that inspection period.

Specific Areas of the Facility to be Inspected
Inspectors must examine the following:

- Industrial materials, residue, or trash that may have or could come into contact with storm water;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;

- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site;
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas; and
- Control measures needing replacement, maintenance, or repair. Storm water control measures required by this permit must be observed to ensure that they are functioning correctly. If discharge locations are inaccessible, nearby downstream locations must be inspected. The annual comprehensive site inspection may also be used as one of the routine inspections, as long as all components of both types of inspections are included.

Documentation
The Peat Pit facility must submit an annual report to ADEC that includes the findings from their comprehensive site inspection and any corrective action documentation. If corrective action is not yet completed at the time of submission of this annual report, the permittee must describe the status of any outstanding corrective action(s). A copy of the Annual Report From ADEC requires is included in Attachment L.

Annual Reports may be submitted electronically through the ADEC Online Application System (OASys) located at http://www.dec.alaska.gov/water/oasys/index.html. By February 15th of the year following the reporting year, the permittee must submit the annual report to ADEC to the address identified below or via OASys.

State of Alaska
Department of Environmental Conservation
Division of Water
Compliance and Enforcement Program
555 Cordova Street
Anchorage, Alaska 99501
Telephone Nationwide (877) 569-4114
Anchorage Area / International (907) 269-4114
Fax (907) 269-4604
Email: dec-wqreporting@alaska.gov

5.3 QUARTERLY VISUAL ASSESSMENT OF STORM WATER DISCHARGES

During normal facility operating hours, the Peat Pit facility will conduct quarterly visual assessment of storm water discharges of areas of the facility covered by the requirements in the MSGP permit as follows.

Person(s) Conducting Assessments
Anton K. Johansen

Schedule for Conducting Assessments
Once each calendar quarter for the entire permit term, the permittee must collect a storm water sample from each outfall (except as noted in MSGP Part 6.2.3) and conduct a visual assessment of each of these samples. These samples are not required to be collected consistent with 40 CFR Part 136 procedures but should be collected in such a manner that the samples are representative

of the storm water discharge. If no discharge occurs during the quarterly visual assessment period, the permittee must still report no discharge for this monitoring period and follow the requirements of MSGP Part 7.1.6.

Quarterly Visual Assessment Procedure

- Of a sample in a clean, clear glass, or plastic container, and examined in a well-lit area;
- On samples collected within the first 30 minutes of an actual discharge from a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and the permittee must document why it was not possible to take samples within the first 30 minutes. In the case of snowmelt, samples must be taken during a period with a measurable discharge from the permittees site; and
- For storm events, on discharges that occur at least 72 hours (3 days) from the previous discharge. The 72-hour (3-day) storm interval does not apply if the permittee documents that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period.

Sample Quality Characteristics to be Examined During Assessments

A permittee must visually inspect the sample for the following water quality characteristics:

- Color;
- Odor;
- Clarity (dimished);
- Floating solids;
- Settled solids;
- Suspended solids;
- Foam;
- Oil sheen; and
- Other obvious indicators of storm water pollution.

Documentation.

A permittee must document the findings of each visual assessment and maintain this documentation onsite with the SWPPP. The permittee is not required to submit the routine facility inspection findings to ADEC, unless specifically requested to do so. Quarterly Visual Assessment Reports are included in Attachment M.

Exceptions to Quarterly Visual Assessments

The following describes the exceptions to quarterly visual assessments:

Adverse Weather Conditions – When adverse weather conditions prevent the collection of samples during the quarter, the permittee must take a substitute sample during the next qualifying storm event. Documentation of the rationale for no visual assessment for the quarter must be included with the SWPPP records as described in Part 5.8. Adverse conditions are those that are dangerous or create inaccessibility for personnel, such as local flooding, high winds, or electrical storms, or situations that otherwise make sampling impractical, such as drought or extended frozen conditions.

Climates with Irregular Storm Water Runoff – If the facility is located in an area where limited rainfall occurs during many parts of the year (e.g., arid or semi-arid climate) or in an area where freezing conditions exist that prevent runoff from occurring for extended periods, then the samples for the quarterly visual assessments may be distributed during seasons when precipitation runoff occurs. (See Part 7.1.6)

Areas Subject to Snow – In areas subject to snow, at least one quarterly visual assessment must capture snowmelt discharge, as described in Part 7.1.3, taking into account the exception described above for climates with irregular storm water runoff.

Inactive and Unstaffed Sites – The requirement for a quarterly visual assessment does not apply at a facility that is inactive and unstaffed, as long as there are no industrial materials or activities exposed to storm water. To invoke this exception, the permittee must maintain a statement in the SWPPP as required in Part 5.2.6.2 indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii). The statement must be signed and certified in accordance with Appendix A, Subsection 1.12. If circumstances change and industrial materials or activities become exposed to storm water or the facility becomes active and/or staffed, this exception no longer applies and the permittee must immediately resume quarterly visual assessments. If the permittee is not qualified for this exception at the time they are authorized under this permit, but during the permit term they become qualified because their facility is inactive and unstaffed, and there are no industrial materials or activities that are exposed to storm water, then the permittee must include the same signed and certified statement as above and retain it with their records pursuant to Part 5.8.

Substantially Identical Outfalls – If a permittees facility has two or more outfalls that discharge substantially identical effluents, as documented in Part 5.2.6.2, the permittee may conduct quarterly visual assessments of the discharge at just one of the outfalls and report that the results also apply to the substantially identical outfall(s) provided that the permittee performs visual assessments on a rotating basis of each substantially identical outfall throughout the period of coverage under this permit.

If storm water contamination is identified through visual assessment performed at a substantially identical outfall, the permittee must assess and modify their control measures as appropriate for each outfall represented by the monitored outfall.

5.4 INSPECTION OF CLEARING, GRADING, AND EXCAVATION ACTIVITIES

As outlined in Part 11.J.4.14, inspections are required as part of clearing, grading, and excavation activities occurring at the facility. Inspection requirements are outline below.

- Inspection Frequency – Inspections must be conducted either at least once every 7 calendar days or at least once every 14 calendar days and within 24 hours of the end of a measurable storm event. If the entire site is temporarily stabilized, inspection frequency may be reduced to at least once every month and within two business days of the end of a measurable storm event at actively staffed sites which resulted in a discharge from the site (pursuant to 11.J.4.15.2). Once active mining has begun, those areas comply with inspections according to 11.J.7.

- Winter Shutdown – If the exploration and construction phase is undergoing winter shutdown the permittee may stop inspections fourteen (14) calendar days after the anticipated fall freeze-up and must resume inspections at least twenty-one (21) calendar days prior to the anticipated spring thaw. The permittee shall identify the winter shutdown period in their SWPPP based upon the definitions of fall freeze-up and spring thaw.
- Location of Inspections – Inspections must include all areas of the site disturbed by clearing, grading, and/or excavation activities and areas used for storage of materials that are exposed to precipitation. Sedimentation and erosion control measures must be observed to ensure proper operation. Discharge locations must be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to waters of the United States, where accessible. Where discharge locations are inaccessible, nearby downstream locations must be inspected to the extent that such inspections are practicable. Locations where vehicles enter or exit the site must be inspected for evidence of significant off-site sediment tracking.
- Inspection Reports - For each inspection required above, the permittee must complete an inspection report. A Routine Facility Inspection Report can be used and is included in Attachment K.

6.0 CORRECTIVE ACTIONS

Sections 6.1 through 6.6 of this SWPPP describe corrective actions required under the permit.

6.1 CONDITIONS REQUIRING REVIEW AND REVISION TO ELIMINATE PROBLEM

If any of the following conditions occur, the permittee must review and revise the selection, design, installation, and implementation of their control measures to ensure that the condition is eliminated and will not be repeated in the future:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-storm water not authorized by this or another APDES permit) occurs at the permittees facility;
- A discharge violates a numeric effluent limit;
- The permittee becomes aware, or ADEC determines, that the permittee's control measures are not stringent enough for the discharge to meet water quality standards in the receiving water;
- An inspection or evaluation of the permittees facility by an ADEC or EPA official determines that modifications to the control measures are necessary to meet the non-numeric effluent limits in this permit; or
- The permittee finds in their routine facility inspection, quarterly visual assessment, or comprehensive site inspection that their control measures are not being properly operated and maintained.

6.2 CONDITIONS REQUIRING REVIEW TO DETERMINE IF MODIFICATIONS ARE NECESSARY

If any of the following conditions occur, the permittee must review the selection, design, installation, and implementation of their control measures to determine if modifications are necessary to meet the effluent limits in this permit:

- Construction or a change in design, operation, or maintenance at a permittees facility significantly changes the nature of pollutants discharged in storm water from their facility, or significantly increases the quantity of pollutants discharged; or
- The average of four quarterly sampling results exceeds an applicable benchmark. If less than four benchmark samples have been taken, but the results are such that an exceedence of the four quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than four times the benchmark level) this is considered a benchmark exceedence, triggering this review.

6.3 CORRECTIVE ACTION DEADLINES

A permittee must document their discovery of any of the conditions listed in Section 6.1 and 6.2 of this SWPPP within 24 hours of making such discovery. Subsequently, within 14 days of such discovery, the permittee must document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination. Specific documentation required within 24 hours and 14 days is detailed in Section 6.4 of this SWPPP. If a permittee determines that changes are necessary following their review, any modifications to their control measures must be made before the next storm event if possible, or as soon as practicable following that storm event. These time intervals are not grace periods, but are schedules considered reasonable for documenting a permittees findings and for making repairs and improvements. They are included in this permit to ensure that the conditions prompting the need for these repairs and improvements are not allowed to persist indefinitely.

6.4 CORRECTIVE ACTION REPORT

Within 24 hours of discovery of any condition listed in Parts 6.1 and 6.2 of this SWPPP, the permittee must document the following information:

- Identification of the condition triggering the need for corrective action review;
- Description of the problem identified; and
- Date the problem was identified.

The above information can be reordered on a Corrective Action Documentation from which is included in Attachment N. These questions also relate to questions 3-5 of the Corrective Actions section in the Annual Reporting Form, provided in Attachment L.

Within 14 days of discovery of any condition listed in Parts 6.1 and 6.2, the permittee must document the following information (these questions relate to questions 7-11 of the Corrective Actions section in the Annual Reporting Form, included in Attachment L):

- Summary of corrective action taken or to be taken (or, for triggering events identified in Part 6.2 where the permittee determines that corrective action is not necessary, the basis for this determination);
- Notice of whether SWPPP modifications are required as a result of this discovery or corrective action;
- Date corrective action initiated; and
- Date corrective action completed or expected to be completed.

- A permittee must submit this documentation in an annual report and retain a copy onsite with the SWPPP.

6.5 EFFECT OF CORRECTIVE ACTION

If the event triggering the review is a permit violation (e.g., non-compliance with an effluent limit) it must be documented using the Noncompliance Notification Form (Attachment J). Furthermore, correcting it does not remove the original violation. Additionally, failing to take corrective action in accordance with this section is an additional permit violation.

6.6 SUBSTANTIALLY IDENTICAL OUTFALLS

Substantially identical outfalls do not apply to the Peat Pit facility as this facility has only one outfall.

7.0 SWPPP CERTIFICATION

OPERATOR

I certify under penalty of law that I have read the terms and conditions of the Alaska Pollutant Discharge Elimination System (APDES) permit that authorizes the storm water discharges associated with industrial activity identified as part of this certification. This document and all attachments were prepared in accordance with reasonable business standards.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: _____ Title: _____

Signature: _____ Date: _____

- A permittee must submit this documentation in an annual report and retain a copy onsite with the SWPPP.

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If the event triggering the review is a permit violation (e.g., non-compliance with an effluent limit) it must be documented using the Noncompliance Notification Form (Attachment J). Furthermore, correcting it does not remove the original violation. Additionally, failing to take corrective action in accordance with this section is an additional permit violation.

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OPERATOR

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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Anton K. Johansen Title: Vice President

Signature: Anton K. Johansen Date: 7-30-15

DOCUMENT PREPARER

I certify under penalty of law that I have read the terms and conditions of the general Alaska Pollutant Discharge Elimination System (APDES) permit that authorizes the storm water discharges associated with industrial activity identified as part of this certification. This document and all attachments were prepared in accordance with reasonable business standards. The information contained in this document and all attachments are, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date: July 30, 2015

CERTIFIED PROFESSIONAL IN EROSION AND SEDIMENT CONTROL
CPESC
Edmond Charles Packee
No. 2337

Edmond C. Packee, Jr. PhD
Senior Scientist
Travis/Peterson Environmental Consulting, Inc.

8.0 SWPPP MODIFICATIONS

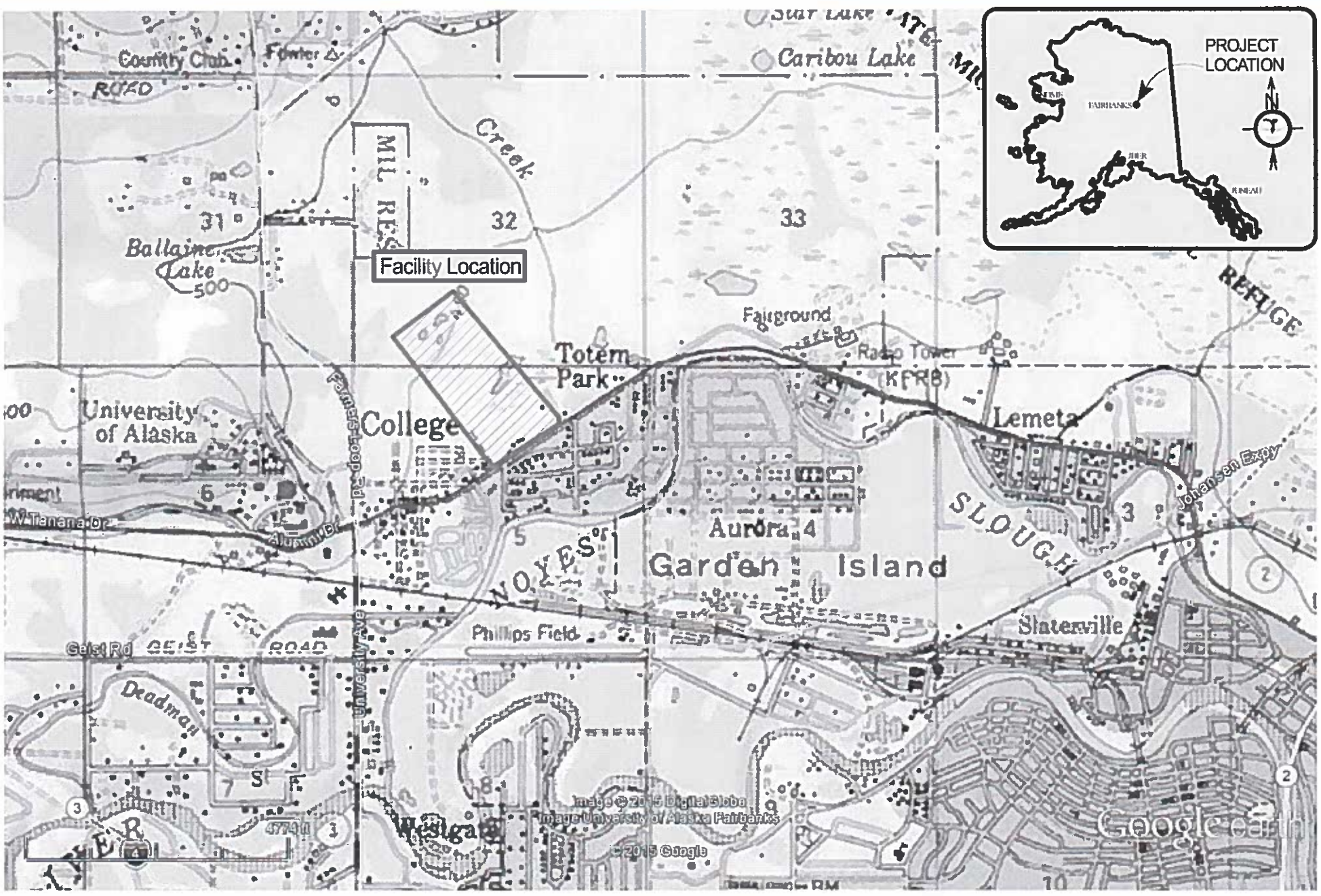
This SWPPP is a "living" document and is required to be modified and updated, as necessary, in response to corrective actions. See Section 6.0 of this SWPPP.

- If SWPPP modification is required in response to any of the corrective actions listed in Section 8.0 above, then the certification statement in Section 7.0 of this SWPPP must be re-signed in accordance with MSGP Appendix A, Subsection 1.12.5.
- For any other SWPPP modification, the Peat Pit facility must keep a log with a description of the modification, the name of the person making it, and the date and signature of that person. A SWPPP modification revision log is included on page ii of this SWPPP.

LIST OF ATTACHMENTS

Attachment A	**General Location Map**
Attachment B	**Site Map(s) and BMP Specifications**
Attachment C	**2015 MSGP, NOI, and NOI Modification Form**
Attachment D	**Spill Log and Spill Information**
Attachment E	**Previous Permit Sampling Data**
Attachment F	**Maintenance Log**
Attachment G	**Employee Training Records**
Attachment H	**Active/Inactive Status Change Form**
Attachment I	**MDMR, Benchmark Monitoring Data, and Benchmark Exceedance Form**
Attachment J	**Noncompliance Notification Form**
Attachment K	**Routine Facility Inspection Report**
Attachment L	**Annual Report Form**
Attachment M	**Quarterly Visual Assessment Report**
Attachment N	**Corrective Action Documentation**

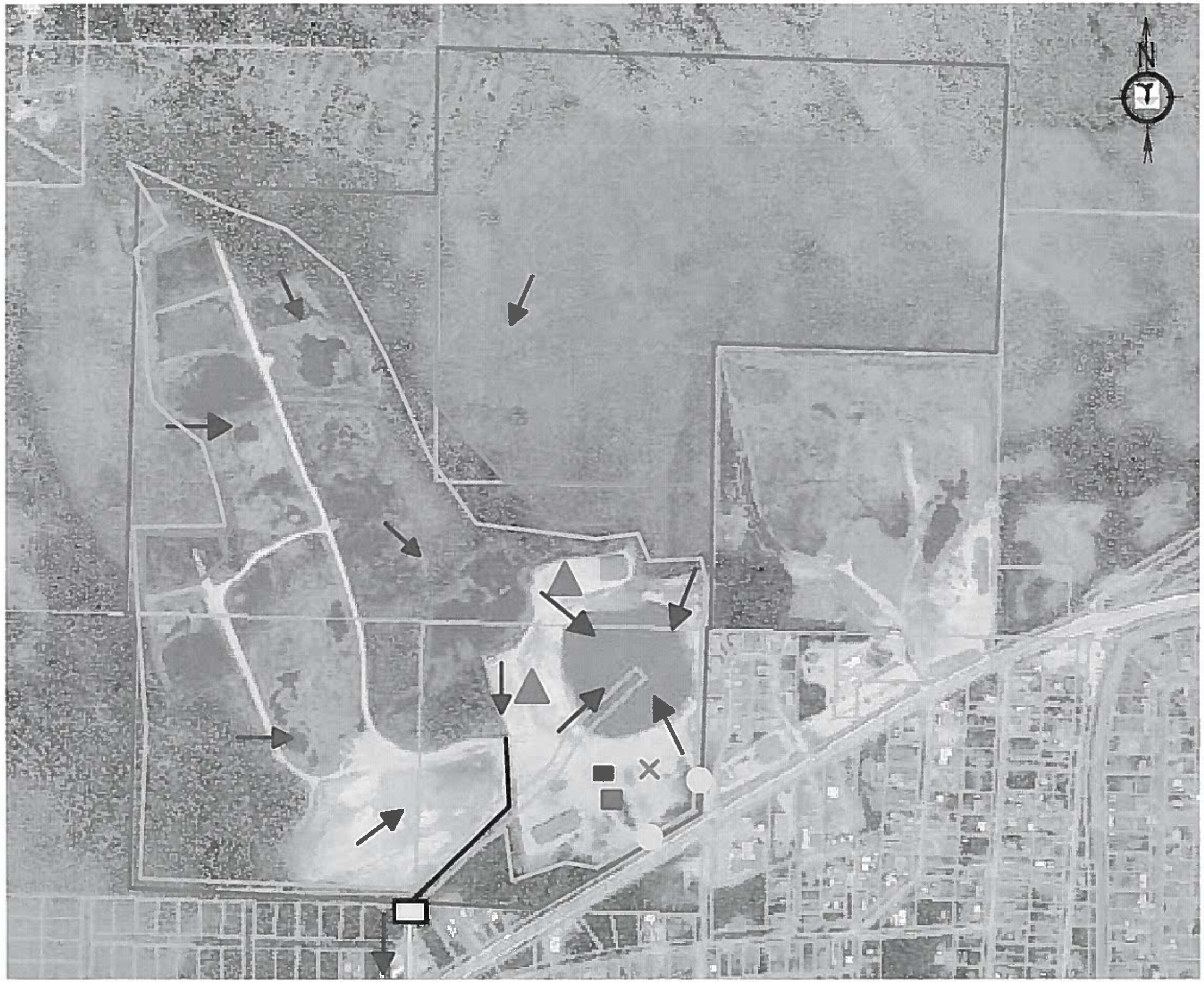
ATTACHMENT A
GENERAL LOCATION MAP



TRAVIS/PETERSON ENVIRONMENTAL CONSULTING, INC. 329 2ND STREET FAIRBANKS, ALASKA 99701	GREAT NORTHWEST, INC. PEAT PIT MSGP		FIGURE 1 GENERAL LOCATION MAP
PROJECT NO: 1008-39	FILE: PROJECTS/1008/39/ATTACHMENTS/A/FIGURE 1.SKF	DATE: 07/30/2015	SCALE: AS SHOWN

ATTACHMENT B

SITE MAP(S) AND BMP SPECIFICATIONS



Notes

1. The size of the property is 252 acres.
2. The significant structures on the property include the office which is depicted on the site map.
3. The direction of storm water flow is depicted on the site map.
4. The existing structural control measures include grading the site to drain to the settling ponds and utilization of the existing well established vegetation buffer depicted on the site map.
5. Receiving waters for this site include reclaimed excavation ponds (considered jurisdictional wetlands) during spring break up, Noyes Slough, and the Chena River. Noyes Slough is imparied for debris.
6. Storm water conveyances on the property include a ditch and culvert which are depicted on the site map.
7. Locations of potential pollutant sources are outline in Section 2.1 of the SWPPP.
8. No significant spilled or leaks have occurred at the facility.
9. Stormwater monitoring is at Outfall #1 which is depicted on the site map.
10. Outfall #1 is (depicted on the map) is the only outfall associated with the facility.
11. MS4 storm systems onsite include the ditch line (depicted on the map). From the ditch line water discharges to a culvert (depicted on the map).
12. There are no non-storm water discharges (aside from those authorized by the permit) associated with the facility.
13. None of the following activities are located onsite:
    - Vehicle and equipment maintenance and/or cleaning areas; and
    - Processing and storage areas.
14. The fueling area and liquid storage tanks are depicted on the site map.
15. Immediate access roads to the facility include College Road.
16. Storage and processing areas are depicted on the site map.
17. Transfer areas for substances in bulk occur in the storage area.
18. Machinery is used through the site, but is stored in the storage and/or processing area.
19. There are no sources of run-on to the facility from adjacent properties that contain significant quantities of pollutants.

Legend

- Active Mining
- Vegetation Buffer
- Future Mining
- Ditch Line
- Office
- Culvert
- Outfall #1
- Storage Area
- Fueling and Liquid Storage Tanks
- Process Area
- Entrance/Exit
- Surface Flow Direction

TRAVIS/PETERSON ENVIRONMENTAL CONSULTING, INC. 329 2ND STREET FAIRBANKS, ALASKA 99701	**GREAT NORTHWEST, INC.** **PEAT PIT MSGP**	**FIGURE 2** **SITE MAP**

PROJECT NO: 1008-39	**FILE: PROJECTS/1008/39/ATTACHMENTS/B/FIGURE 2.SKF**	**DATE: 07/30/2015**	**SCALE: AS SHOWN**

Attachment E
Notice of Intent and Permit Coverage Letter

Great Northwest Inc. – Peat Pit

THE STATE of ALASKA

GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF WATER
Wastewater Discharge Authorization Program

555 Cordova Street
Anchorage, Alaska 99501-2617
Main: 907.269.6285
Fax: 907.334.2415
www.dec.alaska.gov/water/wwdp

August 6, 2015

Company: Great Northwest, Inc.
ATTN: Anton K. Johansen
PO Box 74646
Fairbanks, AK 99707

Facility:
Peat Pit
2920 College Road
Fairbanks, AK 99709

Permit Number: **AKR06AC59**

This email/letter acknowledges that you have submitted a complete Notice of Intent form to be covered under the APDES General Permit for Storm water Discharges for Multi-Sector General Permit Activity (MSGP). The permittee is authorized to discharge storm water under the terms and conditions of this permit **seven (7) calendar days** after acknowledgment of receipt of the permittee's completed NOI is posted on ADEC's Storm Water Permit Search website (http://www.dec.state.ak.us/Applications/Water/WaterPermitSearch/Search.aspx). Coverage under this permit begins seven-days from the "Date Issued" on the Water Permit Search website.

As stated above, this letter acknowledges receipt of a complete Notice of Intent. However, it is not an ADEC determination of the validity of the information you provided. Your eligibility for coverage under the Permit is based on the validity of the certification you provided. Your signature on the Notice of Intent certifies that you have read, understood, and are implementing all of the applicable requirements. An important aspect of this certification requires that you correctly determine whether you are eligible for coverage under this permit.

As you know, the Multi-Sector General Permit requires you to have developed and begun implementing a Storm water Pollution Prevention Plan (SWPPP) and outlines important inspection and record keeping requirements. You must also comply with any additional location-specific requirements applicable to your state or tribal area. A copy of the Multi-Sector General Permit must be kept with your SWPPP. An electronic copy of the Permit and additional guidance materials can be viewed and downloaded at http://www.dec.state.ak.us/water/wnpspc/stormwater/index.htm.

For tracking purposes, the following number has been assigned to your Notice of Intent Form: **AKR06AC59**

If you have general questions regarding the storm water program or your responsibilities under the Multi-Sector General Permit, please call William Ashton (907)269-6283.

For Agency Use

Permit #: _____

Notice of Intent (NOI) For Storm Water Discharges Associated With Industrial Activity Under the APDES Multi-Sector General Permit

Submission of this completed Notice of Intent (NOI) constitutes notice that the operator identified in Section I of this form requests authorization to discharge pollutants to waters of the United States from the facility or site identified in Section III under Alaska's APDES Multi-Sector General Permit (MSGP) for industrial storm water. Submission of this NOI constitutes your notice to DEC that the facility identified in Section III of this form meets the eligibility conditions of Part 1.1 of the MSGP. Please read and make sure you comply with all eligibility requirements, including the requirement to prepare a storm water pollution prevention plan. Refer to the instructions at the end of this form to complete your NOI.

Section I. Operator Information

Organization: Great Northwest, Inc.

Contact Person: Anton K. Johansen

Mailing Address:

Street (PO Box): P.O. Box 74646

City: Fairbanks | State: Alaska | Zip: 99707-4646

Phone: 907-452-5617 | Fax (optional): 907-456-7779 | Email: tjohansen@grtnw.com

Section II. Billing Contact Information

Organization: Great Northwest, Inc.

Contact Person: Lori McCarter

Mailing Address:

☐ Check here if same as Operator Information

Street (PO Box): P.O. Box 74646

City: Fairbanks | State: Alaska | Zip: 99707-4646

Phone: 907-452-5617 | Fax (optional): 907-456-7779 | Email: tjohansen@grtnw.com

Section III. Facility Information

Facility Name: Peat Pit

Have storm water discharges from your site been covered previously under an APDES or NPDES Permit? ☑ Yes ☐ No

a. 1. If Yes, provide the Tracking Number if you have coverage under MSGP 2008 or the APDES permit number if you had coverage under a DEC individual permit. AKR050000

2. Have you paid a Multi-Sector General Permit (MSGP) authorization fee for this calendar year? ☑ Yes ☐ No

b. If No, was your facility in operation and discharging storm water prior to September 29, 2013? ☐ Yes ☐ No

c. If No to "b", did your facility commence discharging after September 29, 2013 and before the effective date of this permit ☐ Yes ☐ No

Location Address:

Street: 2920 College Road

Borough or similar government subdivision

City: Fairbanks | State: Alaska | Zip: 99709

Latitude: 64.8591 N | Longitude: 147.7255 W | Determined By: ☐ GPS ☐ USGS Topographic Map ☑ Other

If you used a USGS Topographic map, what was the scale?

Estimated area of industrial activity at your site exposed to storm water: 140 (acres)

Is this a federal facility? ☐ Yes ☑ No

For Agency Use

Permit #: _____

Section IV. Discharge Information

Does your facility discharge into a Municipal Separate Storm Sewer System (MS4)? ☐ Yes ☐ No

If yes, name of the MS4 Operator: Fairbanks North Star Borough AKS053414FP

Receiving Water and Wetlands Information: (if additional space is needed for this question, fill out Attachment 1.)

a. What is the name(s) of your receiving water(s) that receive storm water directly and/or through a MS4? If your receiving water is impaired, then identify the name of the impaired segment, if applicable, in parenthesis following the receiving water name.	b. Are any of your discharges directly into any segment of an "impaired" water?		c. If you answered yes to question b, then answer the following three questions: i. What pollutant(s) are causing the impairment?	ii. Are the pollutant(s) causing the impairment present in your discharge?		iii. Has the TMDL been completed for the pollutant(s) causing the impairment?	
	Yes	No	Sediment, Oil/Grease also	Yes	No	Yes	No
Noyes Slough	☑	☐	Debris	☐	☑	☑	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐

Federal Effluent Limitation Guidelines and Sector-Specific Requirements

a. Are you requesting permit coverage for any storm water discharges subject to effluent limitation guidelines? ☑ Yes ☐ No

b. If yes, which effluent limitation guidelines apply to your storm water discharge?

40 CFR Part/Subpart	Eligible Discharges	Affected MSGP Sector	Check if applicable
Part 411, Subpart C	Runoff from material storage piles at cement manufacturing facilities.	E	☐
Part 418, Subpart A	Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished products, by-products, or waste products (SIC 2874).	C	☐
Part 423	Coal pile runoff at steam electric generating facilities.	O	☐
Part 429, Subpart I	Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas.	A	☐
Part 436, Subpart B, C, or D	Mine dewatering discharges at crushed stone mines, construction sand and gravel mines, or industrial sand mines.	J	☑
Part 443, Subpart A	Runoff from asphalt emulsion facilities.	D	☐
Part 445, Subparts A & B	Runoff from hazardous waste and non-hazardous waste landfills.	K, L	☐
Part 449, Subpart A	Runoff from Air Transportation	S	☐

If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of glycol-based deicing/anti-icing chemicals and/or 100 tons or more of urea on an average annual basis? ☐ Yes ☐ No

Identify the 4-digit Standard Industrial Classification (SIC) code or 2-letter Activity Code that best represents the products produced or services rendered for which your facility is primarily engaged, as defined in MSGP:

Primary SIC Code: 1442 or

Primary Activity Code:

Identify the applicable sector(s) and subsector(s) of industrial activity, including co-located industrial activity, for which you are requesting permit coverage:

Sector	Subsector
J	J1

Sector	Subsector

Sector	Subsector

Is your site presently inactive or unstaffed? ☐ Yes ☑ No

a. If Yes, is your site expected to be inactive and unstaffed for the entire permit term? ☐ Yes ☐ No

b. If No to "a", then indicate the length of time that you expect your facility to be inactive and unstaffed.

Section V. Storm Water Pollution Prevention Plan (SWPPP) Contact Information

SWPPP Contact Name: Anton K. Johansen

Phone: (907) 452-5617

Email: tjohansen@grtnw.com

URL of SWPPP (if applicable):

For Agency Use

Permit #: _____

Section VI. Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Anton K. Johansen	Vice President
Printed Name	Title
Anton K. Johansen	July 30, 2015
Signature	Date
Great Northwest, Inc.	tjohansen@grtnw.com
Organization	Email

Section VII. NOI Preparer (Complete if NOI was prepared by someone other than the certifier.)

Printed Name	Title
Organization	Phone
Email	

Section VIII. Document Attachments

Documents attached with this application:

Attachment 1 : Receiving Waters

For Agency Use

Permit #: _____

Attachment 1. (Fill in as necessary if more space is required for Receiving water and Wetlands Information.)

a. What is the name(s) of your receiving water(s) that receive storm water directly and/or through a MS4? If your receiving water is impaired, then identify the name of the impaired segment, if applicable, in parenthesis following the receiving water name.	b. Are any of your discharges directly into any segment of an "impaired" water?		c. If you answered yes to question b, then answer the following three questions:				
			i. What pollutant(s) are causing the impairment?	ii. Are the pollutant(s) causing the impairment present in your discharge?		iii. Has the TMDL been completed for the pollutant(s) causing the impairment?	
	Yes	No		Yes	No	Yes	No
Noyes Slough (Residue)	☑	☐	Debris	☐	☑	☑	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐
	☐	☐		☐	☐	☐	☐