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	IDR1000XL	190416	}	B	2

Remarks

21 _____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 05 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
Eastridge Subdivision No. 1 East Lake Hazel Road Meridian, ID 83642	2:00 PM 4/16/2019	2/16/2017
	Exit Time/Date	Permit Expiration Date
	5:15 PM 4/16/2019	2/16/2022

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

Steve Sears, Project Manager, 208-870-1272 (phone)
Andrew Hoch, Consultant, 208-741-4949 (phone)

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

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

Jim Conger, Project Manager, 208-336-5355 (phone)
Conger Management Group
4824 W. Fairview Ave.
Boise, ID 83706

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
Jared Richardson	EPA Contractor 720-789-8036 / 303-279-1793	04/16/2019
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Jeff Kirkwood	EPA/ECAD 206 553 6641	6/19/19

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

ICIS AMR 6/14/19

INSTRUCTIONS

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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).

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A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
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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
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O— Other Inspectors, Federal/EPA (Specify in Remarks columns)
P— Other Inspectors, State (Specify in Remarks columns)
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Columns 73-80: These columns are reserved for regionally defined information.

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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).

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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.

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C15, LLC
4824 W. Fairview Ave.
Boise, ID 83706

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● ● ● ● ● ● ● ● ● ● _____

● ● ● ● ● ● ● ● ● ● _____

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[signature]	EPA/ECAD 206 553 6611	6/14/19

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Region 10 Enforcement and Compliance Assurance Division
1200 6th Avenue
Seattle, WA 98101

INSPECTION REPORT

Inspection Date:	04/16/2019	
Time:	**Entry:** 2:00 p.m.	**Exit:** 5:15 p.m.
Media:	Water	
Regulatory Program:	CWA NPDES/Construction Stormwater	
Operator Name(s):	Conger Management Group – (Notice of Intent IDR1000XL) C15, LLC – (Notice of Intent IDR1000XM)	
Operator Addresses:	4824 W. Fairview Ave.	
Operator City, State, Zip Code:	Boise, Idaho 83706	
Site Name:	Eastridge Subdivision No. 1	
Site Physical Location:	Approximately 14 miles southwest of Boise, Idaho, East Lake Hazel Road, City of Meridian, ID	
	Latitude/Longitude	43.5491°N, 116.3602°W
City, State, Zip Code:	Meridian, Idaho 83642	
Site Contact(s):	Jim Conger, Project Manager Phone: (208) 336-5355 Email: JConger@CongerGroup.com	Conger Management Group/C15, LLC
	Steve Sears, Project Manager Phone: (208) 870-1271 Email: Steve@CongerGroup.com	Conger Management Group/C15,LLC
	Andrew Hoch Phone: (208) 741-4949 Email: a.hoch@symancompany.com	Syman LLC
County:	Ada County, Idaho	
Site Identifier:	Eastridge Subdivision No. 1	
Estimated Site Area to be Disturbed:	22.5 acres	
Site Receiving Water(s)	Farr Lateral	
Site Receiving Water(s) Description:	Irrigation canal	
NPDES Permit:	2017 EPA Construction General Permit (CGP)	
EPA Site Tracking Numbers:	IDR1000XL & IDR1000XM	
Notice of Intent (NOI) Site Timeline(s):	**Start Date:** 02/15/2018	**End Date:** 07/01/2020
Inspector(s):		
Jared Richardson – PG Environmental	U.S. EPA Contract Inspector (Lead Inspector)	(720) 789-8036

Signature:		**Date:** 06/13/2019
Taylor Fontaine – PG Environmental	U.S. EPA Contract Inspector	(703) 956-1977
Tobby Kennedy – Idaho Department of Environmental Quality (IDEQ)	IDEQ Regional Inspector	(208) 528-2664
Jason McDermott – IDEQ	IDEQ Regional Inspector	(208) 736-3878
EPA Region 10 Recipient: Brian Levo		
Signature:		**Date:** 6/14/19

Table of Contents

Section I – Inspection Information 4

Purpose and Scope of the Inspection 4
Opening Conference 4
Site Description 4
Documents Requested During Inspection 5

Section II – Observations 5

Section III – Areas of Concern 6

Records Review Areas of Concern 6
Field Observation Areas of Concern 11

Section IV – Closing Conference 13

Attachment A – Photograph Log and Photos 15

Attachment B – Exhibit Log 23

Section I – Inspection Information

Purpose and Scope of the Inspection

On April 16, 2019, Jared Richardson, U.S. Environmental Protection Agency (EPA) Contract Inspector, fellow PG Environmental staff inspector Taylor Fontaine, and IDEQ Inspectors Tobby Kennedy and Jason McDermott, (hereafter, we or Inspection Team) conducted a construction stormwater inspection of the Conger Management Group/C15, LLC – Eastridge Subdivision No. 1 construction project (hereafter, Site or Permittee). The purpose of the inspection was to determine compliance with the requirements of EPA's National Pollutant Discharge Elimination System (NPDES), 2017 General Permit, for Discharges of Stormwater Associated with Construction Activities (the Permit). The announced inspection consisted of two parts, a records review and a general Site walkthrough.

Opening Conference

A notice of inspection was twice attempted, via phone call, to the Site Contact, Mr. Jim Conger at approximately 1:00 p.m. on the day of the inspection without success. Upon arriving at the Site, located off East Lake Hazel Road, at 2:00 p.m. we observed active construction activities occurring and proceeded to try find an onsite Site representative to conduct the inspection. We reviewed the Site posting and attempted to contact the listed Project Manager, Mr. Steve Sears via phone call. Unable to reach Mr. Sears, we drove the Site to the active construction activities until we were able to finally locate Mr. Sears. At that point, we proceeded to conduct an opening conference with Mr. Sears near the north-central location of the Site prior to conducting the records review and onsite stormwater construction inspection. We were also joined by Mr. Andrew Hoch of Syman, LLC who also served as the Site stormwater pollution prevention plan (SWPPP) developer. During the opening conference, I, Jared Richardson, presented my EPA inspector credential to Mr. Sears and Mr. Hoch (the Site Representatives), exchanged business cards, a sign-in sheet (Refer to Attachment B, Exhibit 2), and informed Site Representatives of the purpose and intent of the Site inspection.

Site Description

The Site is located 14 miles southwest of Boise, ID off East Lake Hazel Road in the City of Meridian. The Site comprises construction activities for a planned single-family home residential community. The planned residential community is located off East Lake Hazel Road. The Site's southern perimeter extends along East Lake Hazel Road (serving as the southern boundary). Private land serves as the northern, eastern, and western Site boundaries, with East Cyanite Drive running through a residential community in the northwest. For an aerial image of the Site, (Refer to Attachment B, Exhibit 1). The Site includes 2 construction entrances, (hereafter, Entrance 1 and Entrance 2), with Entrance 1 located off East Lake Hazel Road and Entrance 2 located off East Cyanite Drive. The total planned disturbance area of the construction activities is 22.5 acres, as described in both of the Site's Notices of Intent (NOIs), which were both certified by Mr. Jim Conger on January 31, 2018. Rough grading had been completed at the Site with the installation of storm sewer piping, but fine grading, pavement/sidewalk construction, installation of storm drain inlets and catch basins, and vertical construction had not begun at the time of the inspection. The official receiving waters for stormwater discharges from the project included the Farr Lateral irrigation canal and an "unnamed" waterway as described in the Site SWPPP and NOIs.

Documents Requested During Inspection

During the opening conference with Site Representatives, we requested the following documents for review:

- Current copy of Site SWPPP and map – Received. The Site SWPPP was signed but not dated by Mr. Jim Conger (Conger Management Group/C15, LLC) at the time of the inspection.
- Site inspection records and corrective action reports (if applicable) – Site inspection records received. The Permittee had been conducting weekly inspections since ground disturbance activities in February 2018 up until the Site inspection on April 16, 2019, except for two 2-week gaps in October and December 2018 (Refer to Area of Concern 3, in Section III below for more details). A corrective action and associated corrective action report was not completed for a 2/27/2019 event triggering a corrective action (Refer to Area of Concern 4, in Section III below for more details).
- Site turbidity monitoring records – Not received. Site Representatives acknowledged that turbidity sampling and monitoring was not conducted.
- Site training log for stormwater team – Received. The Inspection Team noted that while there was no formal itinerary listed for the training, there was a log sheet of the Stormwater Team members that had received SWPPP training.

Section II – Observations

Following the opening conference and records review, the Inspection Team, accompanied by the Site Representatives, began the onsite physical inspection at approximately 3:50 p.m. At the time of the inspection, the Inspection Team observed that the weather was mostly sunny, with the temperature in the upper-50's, with a steady, moderate wind.

We proceeded from our opening conference location in the north-central portion of the Site to the southeastern portion of the construction activities to begin the general Site walk-through. We observed the receiving waters, Farr Lateral, located off the southwestern boundary and an "unnamed" waterway located along the south and eastern boundary. We then progressed initially on a northeasterly route, then on a southwesterly route, eventually directing towards the northwestern boundary.

For a list of areas of concern regarding the onsite review of permit required documents, refer to Section III, Areas of Concern, of this inspection report.

The following field observations were observed by the Inspection Team during the Site walk-through portion of the inspection:

We observed initial construction activities that consisted of the rough grading and sewer infrastructure development. We observed an overall lack of stabilization measures (temporary or permanent) at the Site's eastern boundary as well as lack of adequate erosion and perimeter control best management practices (BMPs) at the Site.

As we progressed towards the eastern Site boundary, we observed the lack of stabilization controls adjacent to the "unnamed" waterway and the eastern Site boundary (Refer to Area of Concern 7, in Section III below for more details). We observed compromised (unmaintained) and noncontiguous

perimeter fiber roll BMPs along the eastern Site boundary as well as an unmaintained sediment controls in the northern and northeastern portions of the Site (Refer to Areas of Concern 8 and 10, in Section III below for more details). We observed that the perimeter control BMPs that had been implemented at the Site were fiber rolls instead of the silt fences outlined in the SWPPP (Refer to Area of Concern 9, in Section III below for more details).

As we made our way back to the southern Site boundary and East Lake Hazel Road, we observed construction vehicle track-out at Entrance 1. We observed that the vehicle track-out at Entrance 1 continued past the initial construction Site boundary, onto East Lake Hazel Road (Refer to Area of Concern 6, in Section III below for more details).

As we progressed towards the northern Site boundary, we observed improper installation and maintenance of sediment control BMPs and evidence of previous erosion (e.g., rill formations) on the embankment slopes (Refer to Areas of Concern 7 and 9, in Section III below for more details). At the northwest Site boundary, we observed additional construction vehicle track-out at Entrance 2 (Refer to Area of Concern 6, in Section III below for more details).

We concluded the Site walk-through portion of the inspection near Entrance 2 towards the northwestern boundary of the Site with the Inspection Team and Site Representatives.

Section III – Areas of Concern

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Records Review Areas of Concern

1. **Permit Part 7.2.4 (Site Map)**

   Include a legible map, or series of maps, showing the following features of the site:

   a. *Boundaries of the property;*
   b. *Locations where construction activities will occur, including:*
      - i. *Locations where earth-disturbing activities will occur (note any phasing), including any demolition activities;*
      - ii. *Approximate slopes before and after major grading activities (note any steep slopes (as defined in Appendix A));*
      - iii. *Locations where sediment, soil, or other construction materials will be stockpiled;*
      - iv. *Any water of the U.S. crossings;*
      - v. *Designated points where vehicles will exit onto paved roads;*
      - vi. *Locations of structures and other impervious surfaces upon completion of construction; and*
      - vii. *Locations of on-site and off-site construction support activity areas covered by this permit (see Part 1.2.1c).*

c. *Locations of all waters of the U.S. within and one mile downstream of the site's discharge point. Also identify if any are listed as impaired, or are identified as a Tier 2, Tier 2.5, or Tier 3 water;*
d. *Areas of federally listed critical habitat within the site and/or at discharge locations;*
e. *Type and extent of pre-construction cover on the site (e.g., vegetative cover, forest, pasture, pavement, structures);*
f. *Drainage patterns of stormwater and authorized non-stormwater before and after major grading activities;*
g. *Stormwater and authorized non-stormwater discharge locations, including:*
    i. *Locations where stormwater and/or authorized non-stormwater will be discharged to storm drain inlets; and*
    ii. *Locations where stormwater or authorized non-stormwater will be discharged directly to waters of the U.S.*
h. *Locations of all potential pollutant-generating activities identified in Part 7.2.3g;*
i. *Locations of stormwater controls, including natural buffer areas and any shared controls utilized to comply with this permit; and*
j. *Locations where polymers, flocculants, or other treatment chemicals will be used and stored.*

And

Permit Part 7.1 (SWPPP General Requirements)
The SWPPP must be kept up-to-date throughout coverage under this Permit.

(Area of Concern 1 Observation)

We observed that the Permittee did not include all minimum information on the SWPPP Site map as required by the Permit Parts 7.2.4 and 7.1. The Permit requires the Permittee to include specific features on the SWPPP Site map as well as keep the SWPPP up to date. The following elements were not depicted or reflective of current Site conditions on the SWPPP's Site map provided to the Inspection Team at the time of the inspection:

a. Locations of sediment and debris stockpiles as required by Part 7.2.4.b.iii of the Permit. The sediment and debris stockpile in the southeast portion of the Site. The sediment stockpile located in the southwest portion of the Site was not identified on the SWPPP Site map (Refer to Attachment A, Photograph 1).

b. The location of the Site "vehicle service area" as required by Part 7.2.4.b.vii of the Permit. This area, located in the north-central portion of the Site contained the Site's material/equipment storage area, as well as the location for mobile fueling operations, and was not identified on the SWPPP Site map (Refer to Attachment A, Photograph 7).

c. Description of the type and extent of pre-construction cover as required by Part. 7.2.4.e of the Permit. There was a lack of adequate mapping regarding the pre-construction cover in the Site SWPPP.

2. Permit Part 7.2.10 (SWPPP Certification)

You must sign and date your SWPPP in accordance with Appendix I, Part I.11.

(Area of Concern 2 Observation)

At the time of the inspection, we observed that the Permittee's SWPPP was signed by Mr. Jim Conger, but not dated as required by the Permit.

3. Permit Part 4.2 (Frequency of Inspections)

At a minimum, you must conduct a site inspection in accordance with one of the two schedules listed below, unless you are subject to the Part 4.3 site inspection frequency for discharges to sensitive waters or qualify for a Part 4.4 reduction in the inspection frequency:
Permit Part 4.2.1 At least once every seven (7) calendar days; or

Permit Part 4.2.2 Once every 14 calendar days and within 24 hours of the occurrence of a storm event of 0.25 inches or greater, or the occurrence of runoff from snowmelt sufficient to cause a discharge.

And

Permit Part 7.1 (SWPPP General Requirements)

The SWPPP must be kept up-to-date throughout coverage under this permit.

(Area of Concern 3 Observation)

We observed that the Permittee's SWPPP did not accurately reflect the implemented Site inspection frequency. Specifically, the SWPPP outlined a Site inspection frequency of once every 14 calendar days and within 24 hours of a storm event; however, based on discussions with Site Representatives, the Site inspections had been conducted every seven (7) calendar days since February 2018 (start of construction land disturbing activities) until the date of the inspection. The Inspection Team acknowledged that the Permittee was normally conducting inspections at a frequency greater than specified in the SWPPP and that the Site does not discharge to an impaired receiving water. However, the SWPPP must be reflective of current Site practices implemented onsite as required by the Permit.

Additionally, we observed several 14-day gaps in Site inspection frequency from October 15-29, 2018 and from December 17-31, 2018. These gaps constitute two missed inspections (the week of October 22 and December 24) per the implemented 7 calendar day Site inspection frequency. At the time of the

inspection, Site Representative Mr. Steve Sears acknowledged that he was out of town during those two missed inspections.

4. Permit Part 5.2 (Corrective Action Deadlines)

For any corrective action triggering conditions in Part 5.1, you must:

5.2.1 *Immediately take all reasonable steps to address the condition, including cleaning up any contaminated surfaces so the material will not discharge in subsequent storm events;*

5.2.2 *When the problem does not require a new or replacement control or significant repair, the corrective action must be completed by the close of the next business day;*

And

Permit Part 5.4 (Corrective Action Report)

For each corrective action taken in accordance with this Part, you must complete a report in accordance with the following:

5.4.1 *Within 24 hours of identifying the corrective action condition, document the specific condition and the date and time it was identified.*

5.4.2 *Within 24 hours of completing the corrective action (in accordance with the deadlines in Part 5.2), document the actions taken to address the condition, including whether any SWPPP modifications are required.*

5.4.3 *Each corrective action report must be signed in accordance with Appendix I, Part I.11 of this permit.*

5.4.4 *You must keep a copy of all corrective action reports at the site or at an easily accessible location, so that it can be made available at the time of an on-site inspection or upon request by EPA.*

And

Permit Part 4.6.6 (Requirements for Inspections)

If a discharge is occurring during your inspection:

a. Identify all discharge points at the site; and;

b. Observe and document the visual quality of the discharge, and take note of the characteristics of the stormwater discharge, including color; odor; floating, settled, or suspended solids; foam; oil sheen; and other indicators of stormwater pollutants.

(Area of Concern 4 Observation)

We observed, that the signed 2/27/2019 Site Inspection Report stated that there was a rain event discharge into the "unnamed" waterway on Site. According to Site Representative Mr. Steve Sears, the discharge was uncontrolled. However, according to the Inspection Report, it was not clear to the Inspection Team what the Permittee implemented as a corrective action and when this corrective action occurred. Specifically, a corrective action report was not prepared. Additionally, there were no details as to any post-discharge turbidity monitoring, visual observations, length of the discharge, areas impacted, or evidence of compliance with Permit requirements.

5. Permit Part 4.6 (Requirements for Inspections)

During your inspection, you must at a minimum:

4.6.1 *Check whether all stormwater controls (i.e., erosion and sediment controls and pollution prevention controls) are properly installed, appear to be operational, and are working as intended to minimize pollutant discharges;*

4.6.2 *Check for the presence of conditions that could lead to spills, leaks, or other accumulations of pollutants on the site;*

4.6.3 *Identify any locations where new or modified stormwater controls are necessary to meet the requirements of Parts 2 and/or 3;*

4.6.4 *Check for signs of visible erosion and sedimentation (i.e., sediment deposits) that have occurred and are attributable to your discharge at points of discharge and, if applicable, the banks of any waters of the U.S. flowing within or immediately adjacent to the site;*

4.6.5 *Identify any incidents of non-compliance observed;*

(Area of Concern 5 Observation)

We observed that the Permittee's inspection process did not appear to be comprehensive or supportive of identifying issues at the site in accordance with Part 4.6 of the Permit. It did not appear that all areas of the Site were adequately evaluated during the Permittee's inspection process including Site BMP controls and signs of visible erosion and sedimentation. For example, at the time of the inspection the Site lacked control measures adjacent to the "unnamed" waterway in the eastern portion of the Site (Refer to Attachment A, Photographs 6 and 8). Additionally, at the time of the inspection we observed areas of the Site where there was visible sedimentation and undercutting of the fiber roll BMPs and where the fiber roll BMPs implemented as a perimeter control was deteriorated and not contiguous along the perimeter (Refer to Attachment A, Photographs 12 and 13). A Permittee Site inspection was conducted the week prior to our Site inspection and none of these issues were denoted in the Permittee's inspection report.

Field Observation Areas of Concern

6. Permit Part 2.2.4 (Minimize sediment track-out)

a. *Restrict vehicle use to properly designated exit points;*
b. *Use appropriate stabilization techniques at all points that exit onto paved roads.*
   i. *Exception: Stabilization is not required for exit points at linear utility construction sites that are used only episodically and for very short durations over the life of the project, provided other exit point controls are implemented to minimize sediment track-out;*
c. *Implement additional track-out controls as necessary to ensure that sediment removal occurs prior to vehicle exit; and*
d. *Where sediment has been tracked-out from your site onto paved roads, sidewalks, or other paved areas outside of your site, remove the deposited sediment by the end of the same business day in which the track-out occurs or by the end of the next business day if track-out occurs on a non-business day. Remove the track-out by sweeping, shoveling, or vacuuming these surfaces, or by using other similarly effective means of sediment removal. You are prohibited from hosing or sweeping tracked-out sediment into any stormwater conveyance, storm drain inlet, or water of the U.S.*

(Area of Concern 6 Observation)

We observed that construction vehicle track-out controls had not been properly installed and maintained at Eastridge Subdivision No. 1 Site Entrances 1 & 2. As a result, construction vehicle track-out and a release and deposition of sediment offsite onto the adjacent public roadways of East Lake Hazel Road and East Cyanite Drive was observed (Refer to Attachment A, Photographs 2-5). Site Representative Mr. Steve Sears mentioned that the Permittee had installed orange fencing as a means to restrict vehicle traffic to the Site at Entrance 2, but had removed it 3 days prior to our inspection. Mr. Steve Sears mentioned that the fencing was removed to accommodate additional onsite roadway fine grading (in-process at time of inspection) in preparation for forthcoming paving work. Additionally, Mr. Sears mentioned that a third-party contractor Curtis Clean Sweep was contracted (on an as-needed basis) to sweep roadways adjacent to construction Entrances 1 & 2; however, this did not appear to have been implemented in the field at the time of the inspection.

7. Permit Part 2.2.7 (Minimize steep slope disturbances)

Minimize the disturbance of "steep slopes" (as defined in Appendix A).

And

Permit Part 2.2.11 (Minimize erosion of stormwater conveyance channels and their embankments, outlets, adjacent streambanks, slopes, and downstream waters)

Use erosion controls and velocity dissipation devices within and along the length of any stormwater conveyance channel and at any outlet to slow down runoff to minimize erosion.

(Area of Concern 7 Observation)

We observed a lack of stabilization practices and control measures at the eastern boundary of the Site adjacent to the "unnamed" waterway. Portions of the upgradient and adjacent unstabilized embankment slopes did not have temporary or permanent stabilization practices implemented. Additionally, there was a lack of flow dissipation controls or channel stabilization for the "unnamed" waterway (e.g., rip-rap, hard armoring). This allowed for the potential contribution and mobilization of pollutants to the waterway and subsequently downstream (Refer to Attachment A, Photographs 6-9).

8. **Permit Part 2.1.2 (Design and install all stormwater controls in accordance with good engineering practices, including applicable design specifications)**

(Footnote 11) Design specifications may be found in manufacturer specifications and/or in applicable erosion and sediment control manuals or ordinances. Any departures from such specifications must reflect good engineering practices and must be explained in your SWPPP. You must also comply with any additional design and installation requirements specified for the effluent limits in Parts 2.2 and 2.3.

And

Permit Part 2.1.4 (Ensure that all stormwater controls are maintained and remain in effective operating condition during permit coverage and are protected from activities that would reduce their effectiveness)

(Area of Concern 8 Observation)

The Inspection Team observed that the fiber roll BMPs along the northern and northeast boundary were not properly installed or maintained in accordance with good engineering practices. Specifically, there was evidence of previous undercutting, bypassing and erosion (i.e., rill/gulley formations) at these control measures near the steep embankment slopes near the northern and northeast Site boundaries (Refer to Attachment A, Photographs 10, 11, and 12). We also observed that the installed perimeter control BMPs on the eastern Site boundary had been compromised (i.e. deteriorated, unstaked) and were not contiguous (Refer to Attachment A, Photograph 13).

9. **Permit Part 7.2.6 (Description of Stormwater Controls)**
   a. *For each of the Part 2.2 erosion and sediment control effluent limits, Part 2.3 pollution prevention effluent limits, and Part 2.4 construction dewatering effluent limits, as applicable to your site, you must include the following:*
      i. *A description of the specific control(s) to be implemented to meet the effluent limit;*

ii. *Any applicable stormwater control design specifications (including references to any manufacturer specifications and/or erosion and sediment control manuals/ordinances relied upon);*
iii. *Routine stormwater control maintenance specifications; and*
iv. *The projected schedule for stormwater control installation/implementation.*

And

Permit Part 7.1 (SWPPP General Requirements)

The SWPPP must be kept up-to-date throughout coverage under this Permit.

(Area of Concern 9 Observation)

We observed that fiber roll BMPs had been implemented as perimeter controls at the Site instead of the silt fences that were outlined in the Permittee's SWPPP. The SWPPP must be reflective of current Site conditions.

10. **Permit Part 2.2.3 (Install sediment controls along any perimeter areas of the site that will receive pollutant discharges)**

(Area of Concern 10 Observation)

We observed a lack of effective sediment controls near the northeastern and along the eastern perimeter of the Site. Specifically, the existing fiber roll BMPs were not installed in a contiguous manner per design specifications nor were they a properly selected BMP for an area of concentrated flow from the "unnamed" waterway (Refer to Attachment A, Photographs 13 and 14).

Section IV – Closing Conference

We held a closing conference at the conclusion of the inspection at approximately 4:50 p.m. During the closing conference, we clearly stated that this summary of observations (i.e., areas of concern) was "preliminary" and subject to addition, deletion, and/or modification. The summary of preliminary inspection observations and areas of concern were communicated with the Site Representatives, Mr. Steve Sears of Conger Management Group/C15, LLC and Mr. Andrew Hoch of Syman, LLC .

- Area of Concern 1 – SWPPP and Site map not reflective of current Site conditions;
- Area of Concern 2 – Site SWPPP was not signed;
- Area of Concern 3 – Inconsistent Site inspection frequency compared to SWPPP;
- Area of Concern 4 – Inspection corrective actions not meeting Permit requirements;
- Area of Concern 5 – Inspection procedures and areas inspected not meeting Permit requirements;
- Area of Concern 6 – Releases of sediment offsite to public roadways;
- Area of Concern 7 – Lack of upgradient slope disturbance minimization;

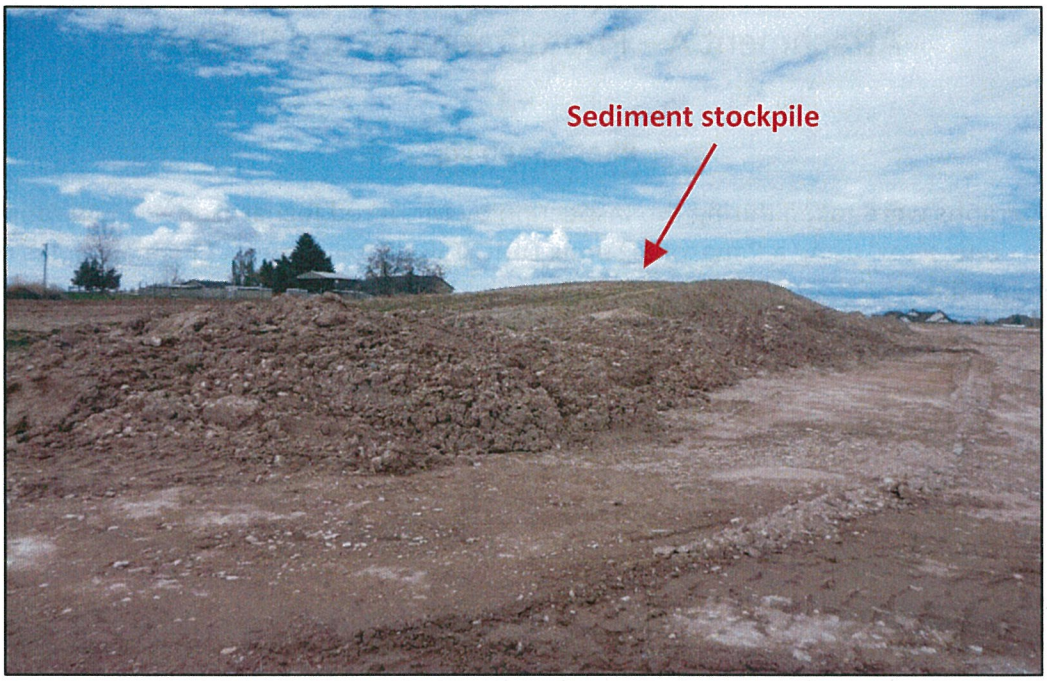
- Area of Concern 8 – Erosion and sediment controls (i.e., BMPs) not properly selected, installed, and maintained;
- Area of Concern 9 – Inconsistent Site control measures compared to SWPPP;
- Area of Concern 10 – Lack of Site perimeter sediment controls.

The closing conference concluded at approximately 5:15 p.m.

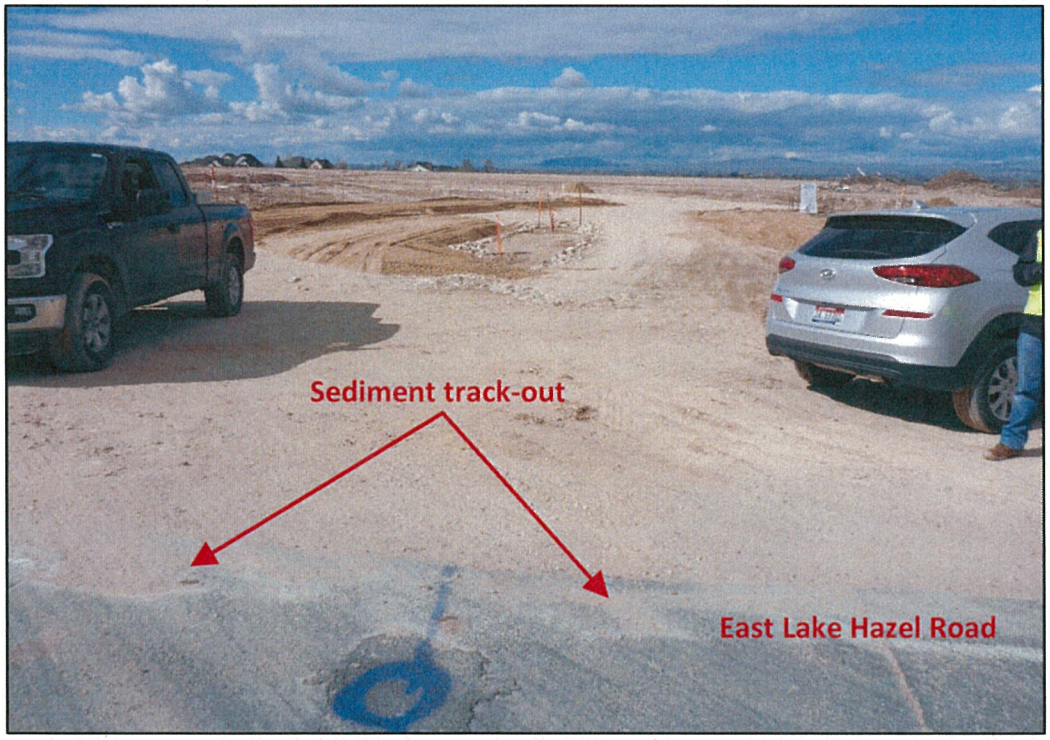
Attachment A – Photograph Log and Photos

Photograph Log

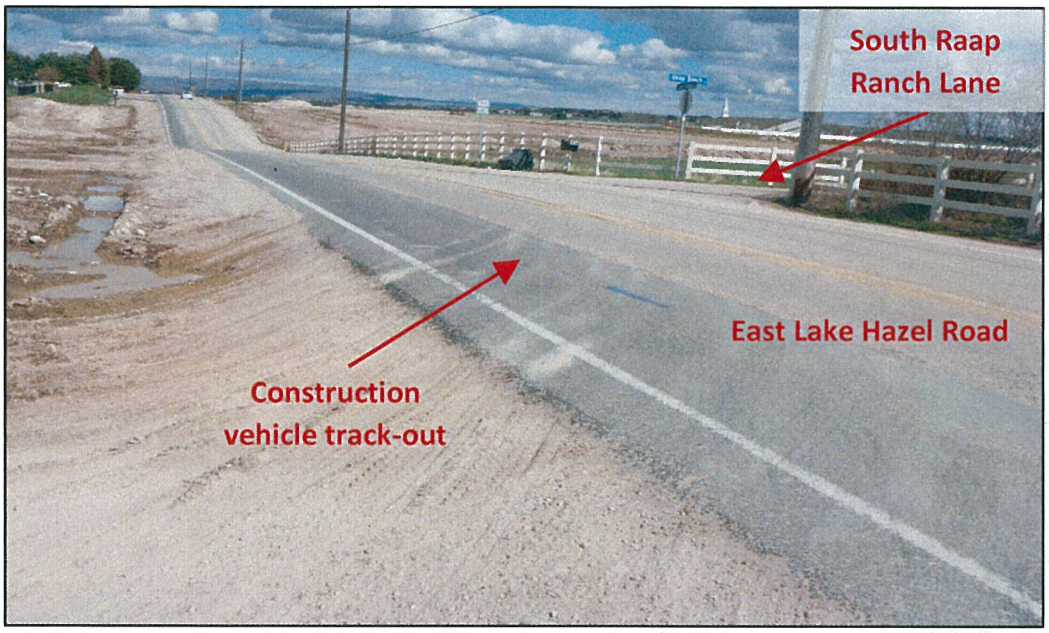
The photographs were taken during the inspection by Mr. Jared Richardson, PG Environmental, a U.S. EPA Contractor, using a Panasonic Lumix DMC-TS6 digital camera. Original copies of the photos are on file.



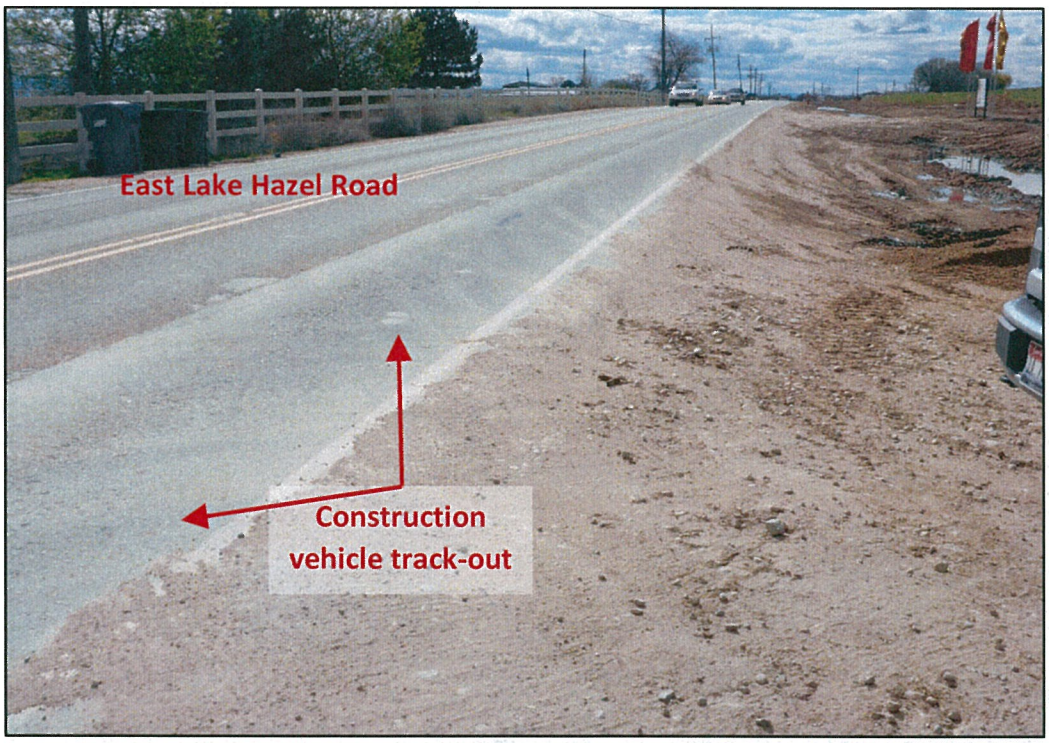
Photograph 1. View, facing northwest, of Eastridge Subdivision No. 1. Note the sediment and debris stockpile located in the southeastern portion of the Site which was not identified on the SWPPP Site map.



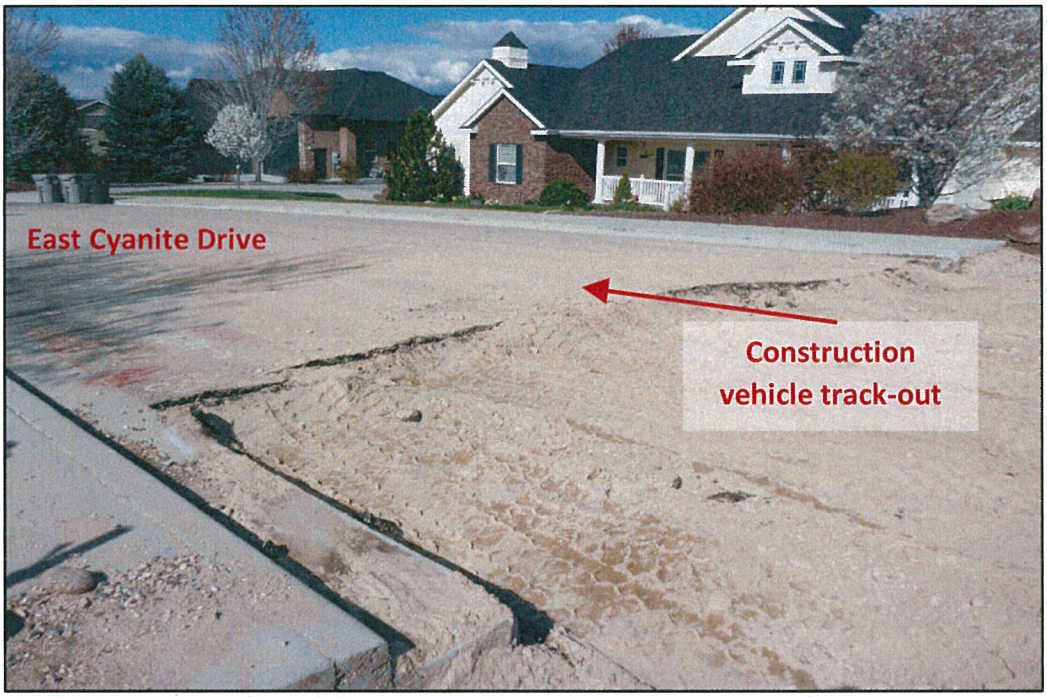
Photograph 2. View, facing north, of construction vehicle track-out at Eastridge Subdivision No. 1 Entrance 1. Note the construction vehicle track-out was not maintained resulting in deposition of sediment onto East Lake Hazel Road, a public roadway.



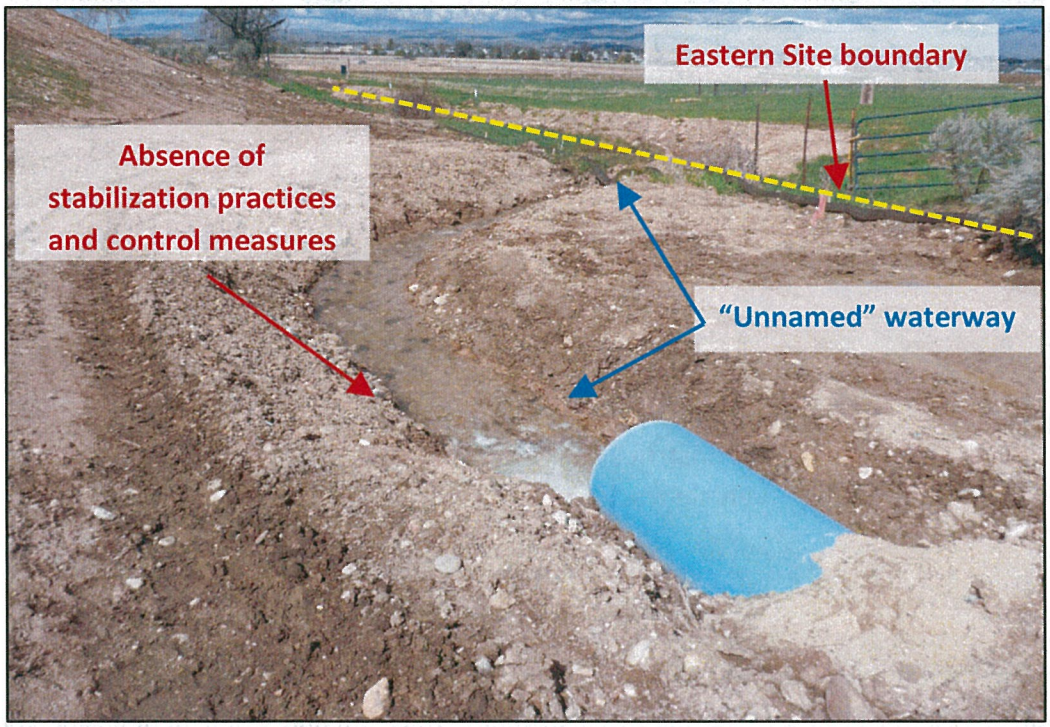
Photograph 3. Additional view, facing southeast, of construction vehicle track-out at Eastridge Subdivision No. 1 Entrance 1. Note the construction vehicle track-out and deposition of sediment onto East Lake Hazel Road, a public roadway.



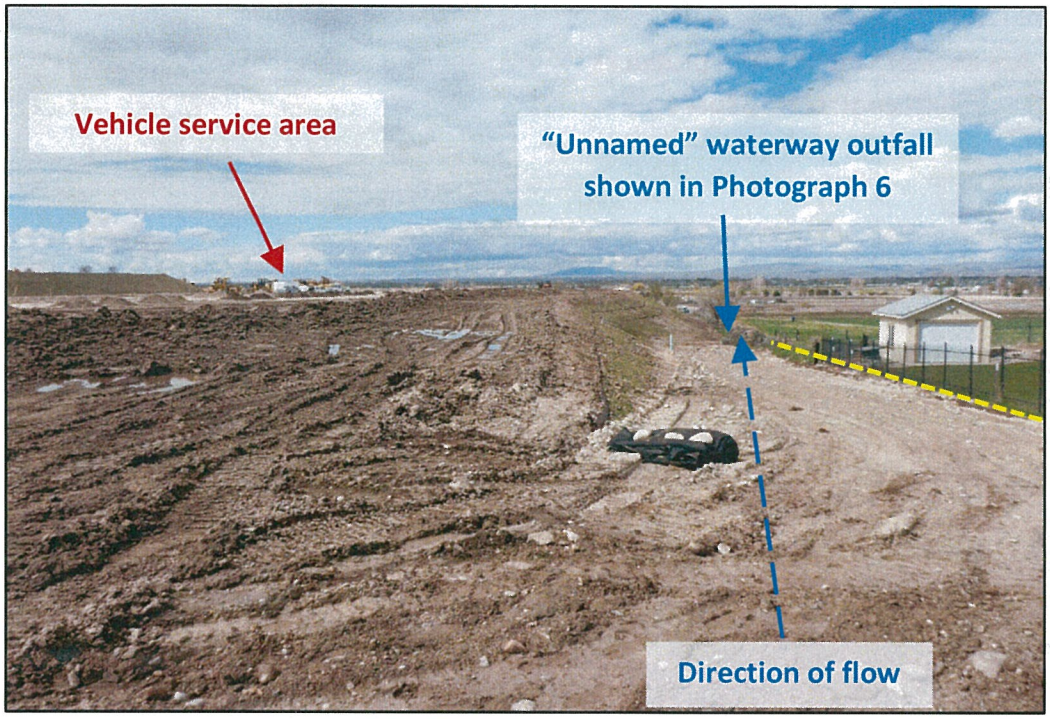
Photograph 4. Additional view facing southwest of vehicle track-out and sediment deposition on the public roadway at Eastridge Subdivision No. 1 Entrance 1. Note the construction vehicle track-out continues in both directions along East Lake Hazel Road.



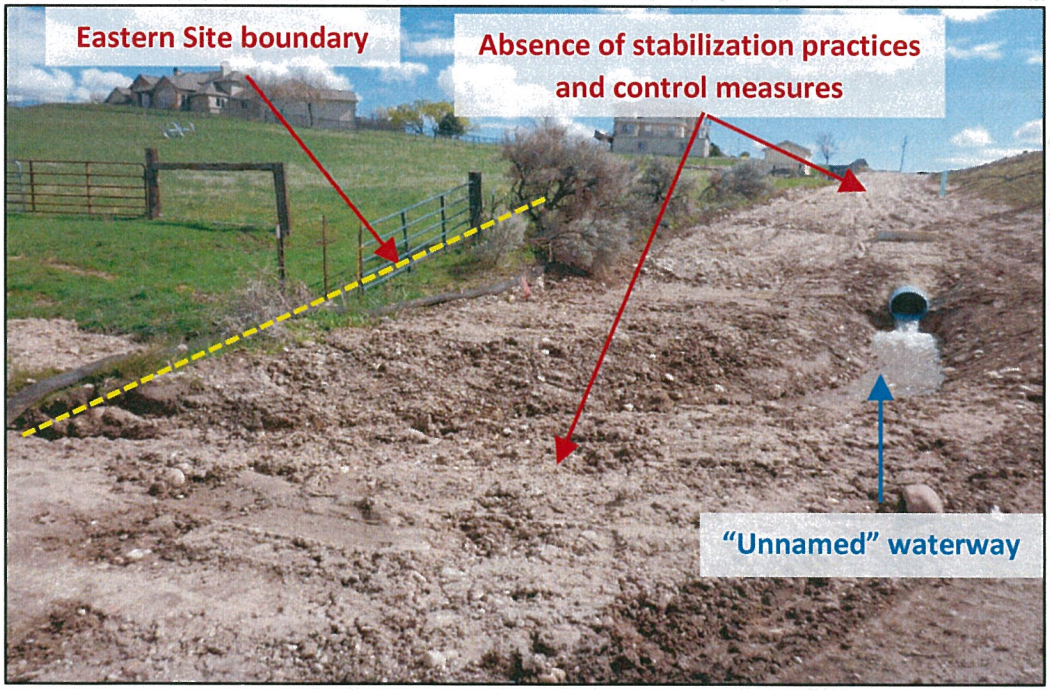
Photograph 5. View, facing northeast, of vehicle track-out and release of sediment offsite onto East Cyanite Drive, a public roadway, at Entrance 2 in the northwest portion of the Site. The Inspection Team did not observe any storm sewer inlets or conveyances downgradient or in the near vicinity of entrance.



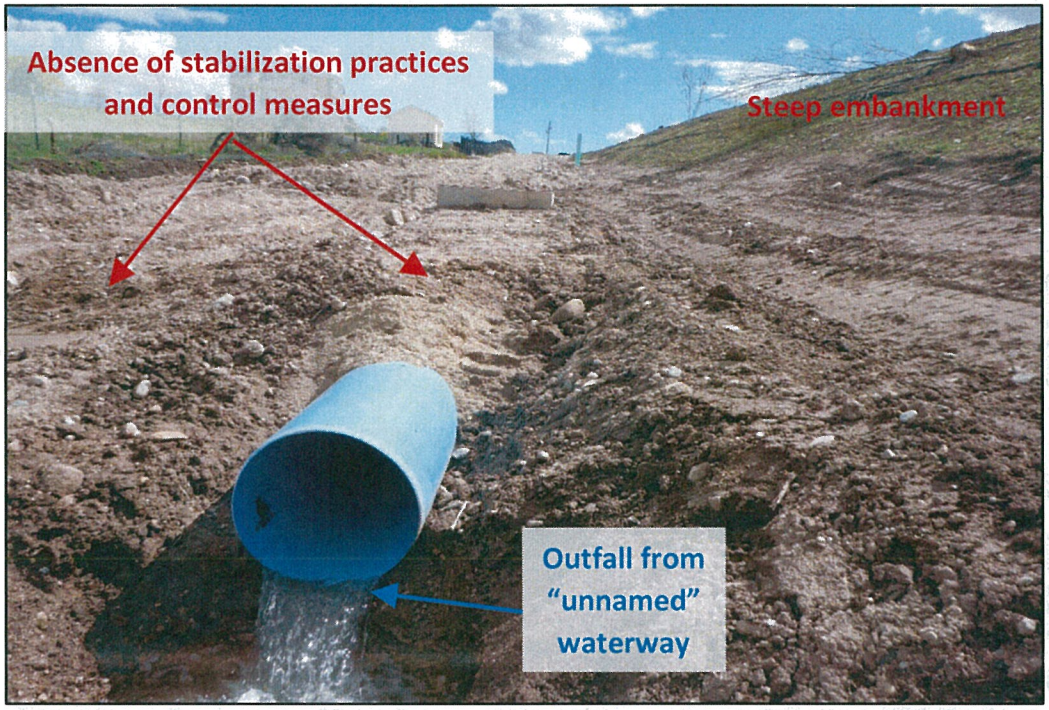
Photograph 6. View, facing northeast, of the outfall to the "unnamed" waterway on the eastern boundary of the Site. Note the lack of stabilization practices and control measures adjacent to and within channel of the "unnamed" waterway.



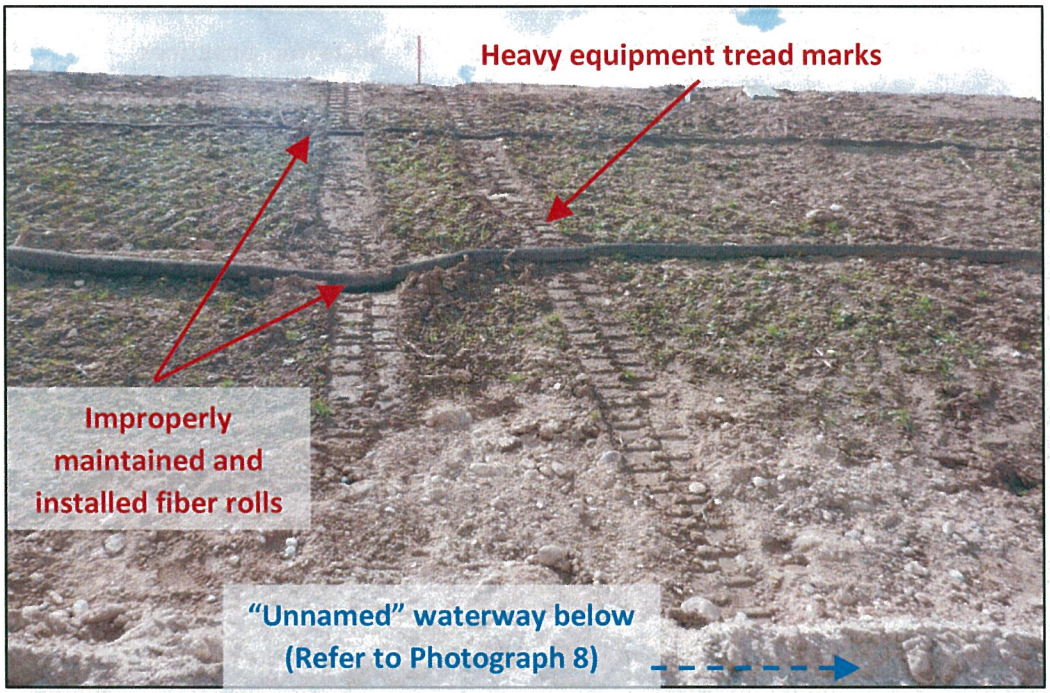
Photograph 7. Perspective downgradient view, facing northeast, of the eastern boundary of the Site. Note the areas of disturbance and lack of upgradient stabilization practices. Also note the location of the "vehicle service area" which was not depicted on the Site map.



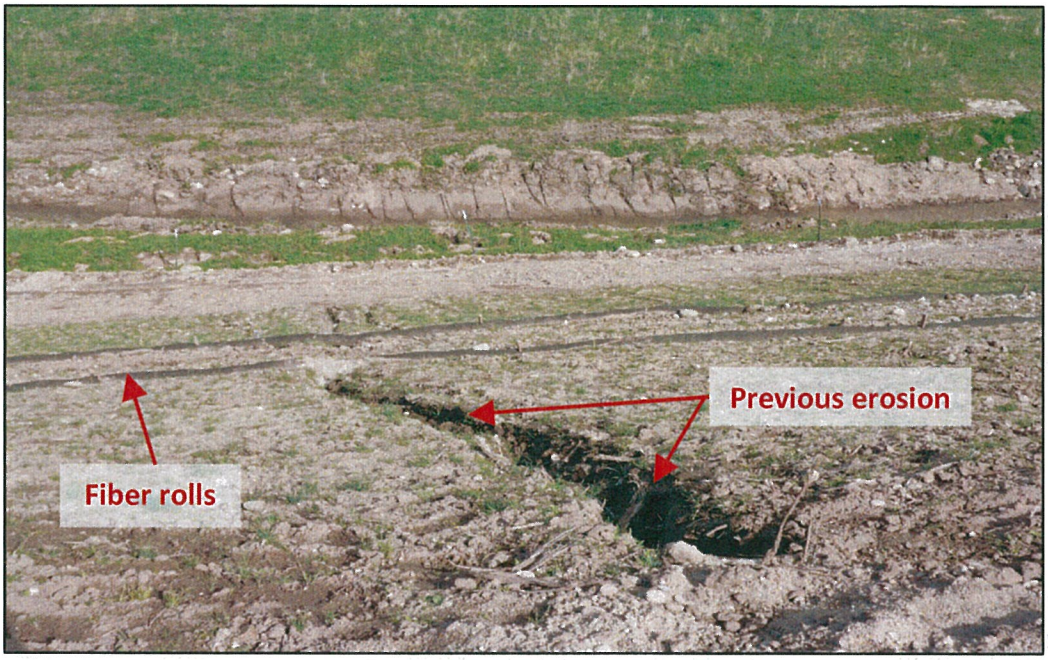
Photograph 8. View, facing south, of the outfall from the "unnamed" waterway on the eastern boundary of the Site. Note the lack of stabilization practices and control measures upgradient and adjacent to the "unnamed" waterway. Also note the lack of velocity dissipation devices at outfall.



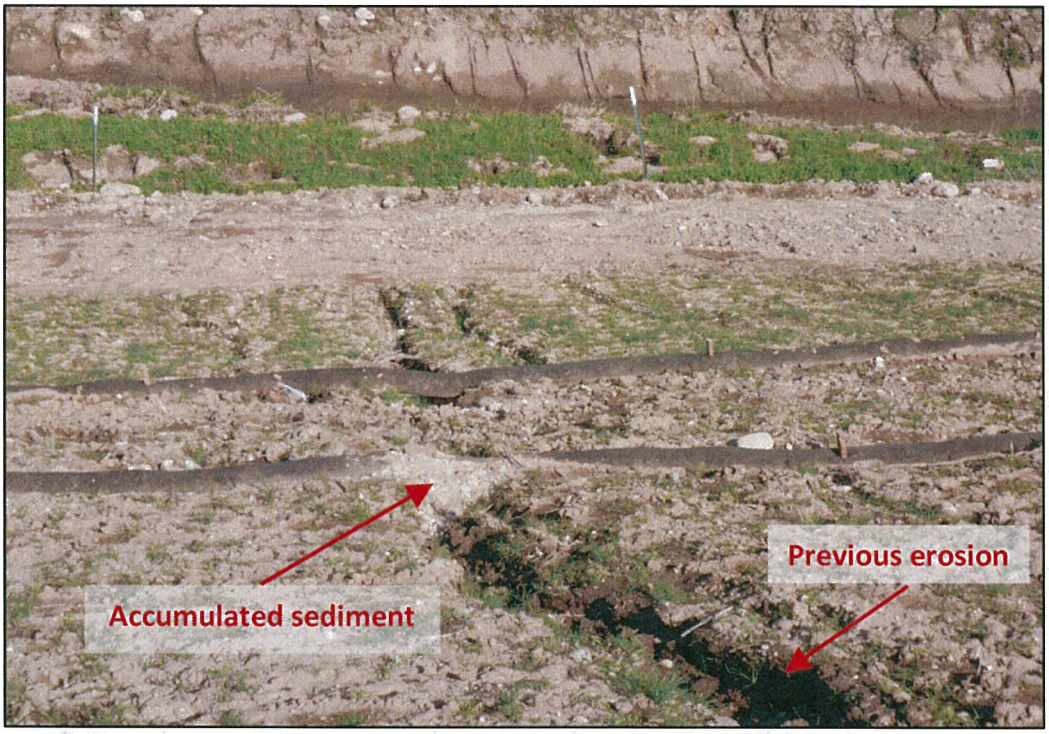
Photograph 9. Additional close up view, facing south, of the outfall from the "unnamed" waterway on the eastern boundary of the Site. Note the estimated 3:1 steep embankment with a lack of sufficient sediment stabilization controls.



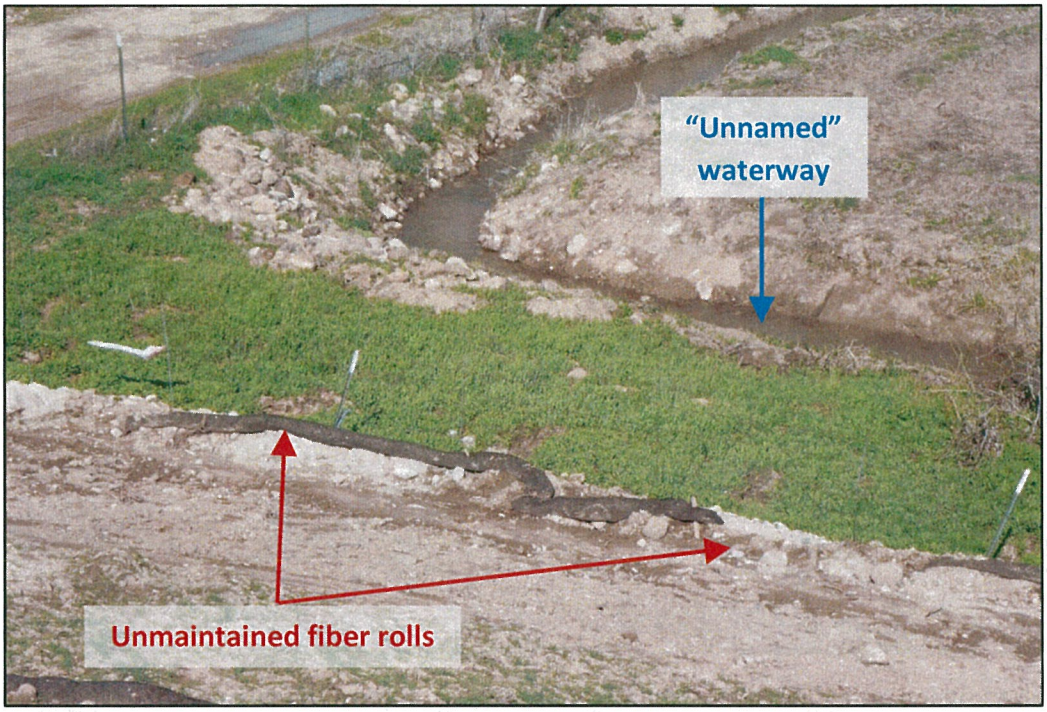
Photograph 10. Upgradient view, facing west, of improperly installed and maintained fiber rolls on the steep slopes in the eastern portion of the Site. Note the fiber rolls were not adequately staked or entrenched per design specifications and were deteriorated from being driven over by equipment.



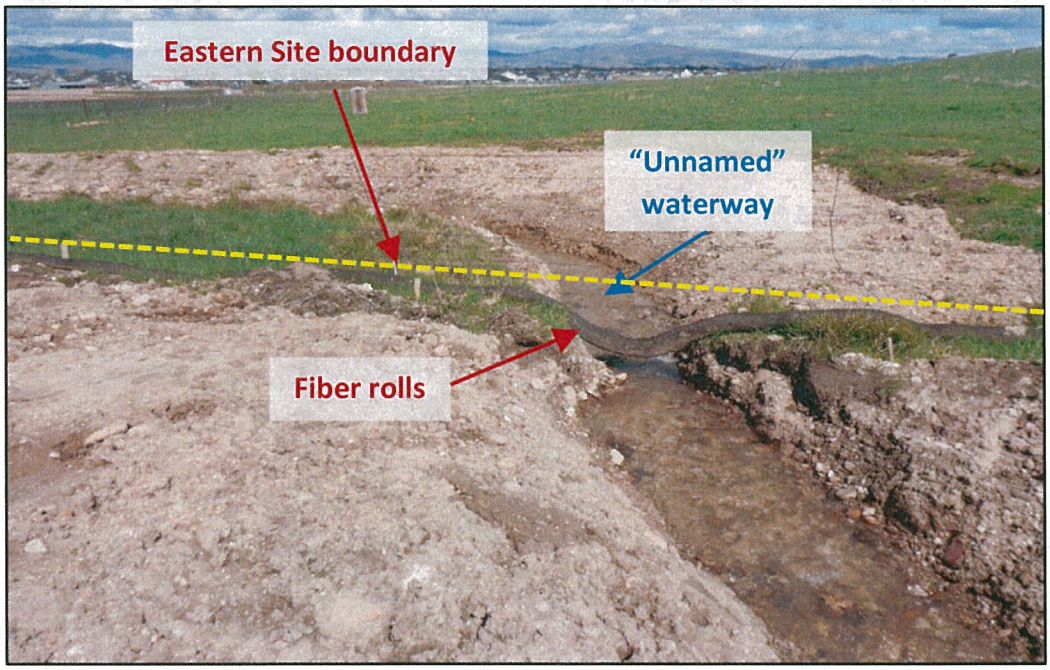
Photograph 11. View, facing north, of evidence of previous gulley erosion and undercutting/bypass of installed fiber rolls on the steep slopes along northern boundary of the Site.



Photograph 12. Close-up view, facing north, of evidence of previous gulley erosion and undercutting/bypass of installed fiber rolls on the steep slopes. Also, note the accumulated sediment on the fiber rolls is more than one-half above the effective height of the control.



Photograph 13. View facing east of the northeastern perimeter of the Site. Note the perimeter control fiber rolls adjacent to the "unnamed" waterway were not properly maintained (e.g., not staked, entrenched, or contiguous).



Photograph 14. View, facing east, at Eastridge Subdivision No. 1 of the "unnamed" waterway and eastern Site boundary. Note the improperly selected fiber roll control measures not designed for areas of concentrated flow.

Attachment B – Exhibit Log

Exhibit 1. Google Earth Pro (imagery date: 7/18/2018). Location of Eastridge Subdivision No. 1 in Meridian, Idaho. Note the overall Site boundary outlined with the dotted yellow line.

EPA REGION 10 STORMWATER INSPECTION SIGN-IN SHEET **(PLEASE PRINT)**

Site/Facility: East Ridge Subdivision Site 1 **Permit No.:** IDR1000XL **Date conducted:** 4 / 16 / 19

Name	Title	Agency/Company	Phone	Email
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Jason McDermott	DEQ C.O	DEQ		Jason.McDermott@DEQ.Idaho.Gov
Andrew Hoch	Consultant	Syman LLC	208-741-4949	ahoch@symancompany.com
Jared Richardson	EPA Contractor	PG Environmental	720-789-8036	jared.richardson@pgenv.com

Exhibit 2. Eastridge Subdivision No. 1 Site – sign-in sheet.