



1/24/2018

NOTICE OF VIOLATION

Failure to Comply with Permit Conditions under 18 AAC 83 – Alaska Pollutant Discharge Elimination System Construction General Permit Authorization Number AKR10FN16 & AKR10FN17.

David Kemp
ADOT&PF Central Region
PO Box 196900
Anchorage, AK 99519

Todd Porter
QAP
240 W. 68th Avenue
Anchorage, AK 99518

Complaint No. 2018-R0034

The Department alleges that beginning on or about March 10, 2017 and continuing up until December 14, 2017, in Anchorage, Alaska, the Alaska Department of Transportation (ADOT) and QAP did unlawfully fail to comply with the conditions of the Alaska Pollutant Discharge Elimination System (APDES) permit.

On December 14, 2017, the Alaska Department of Environmental Conservation (DEC) performed an announced inspection of the Seward Highway: Dimond Boulevard to Dowling Road Reconstruction, Phase 1 construction project for compliance with the APDES, Construction General Permit, Permit Authorization Numbers AKR10FN16 and AKR10FN17. Permit violations identified during the facility inspection and on-site records review include: failure to maintain records, failure to submit required permit application information, failure to properly install/implement BMPs, narrative effluent violation and are enumerated below:

- 1) ADOT did not file a NOI modification to include the use of treatment chemicals (EarthGuard) when QAP did on October 18, 2017. A modification was filed by ADOT on December 13, 2017, 56 days after QAP. More notably, NOIs were not filed by either permittee in April 2017 when ADOT approved the use of the treatment chemicals to be used on the site.
 - a) Permit part **2.7.1.5** states “A permittee must file an NOI modification form to DEC (see Part 2.3) to update or correct the following information on the original NOI within 30 calendar days of the change:... Change in decision to use or not use treatment chemicals...”
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records
- 2) The NOI modifications were not posted on the entrance boards to the site.
 - a) Permit part **5.10.2.1** states “...The sign or other notice must contain the following information: A copy of the completed NOI (and NOI modification) as submitted to DEC;..”

- b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records
- 3) The SWPPP amendment log does not show that the SWPPP was updated to include required items for the use of treatment chemicals on the project site. Therefore, the required treatment chemical documentation was not included in the SWPPP.
 - a) Permit part 4.6.2.3 states “Document the following in the SWPPP: Specific chemicals and chemical treatment systems used; Names and titles of person(s) who handle and apply treatment chemicals; Title of training conducted, date, instructor name, and attendees. A permittee must train employees who handle treatment chemicals to comply with the information required by Part 4.6.1...”
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records
- 4) EarthGuard was not documented as a stabilization measure on the grading and stabilization log, however, DEC was told during the inspection that it was applied as a temporary stabilization measure on the site for winter shutdown.
 - a) Permit part 5.8.2.1.5 states “Summaries of the following information, or copies of the reports, must be maintained with the SWPPP by the permittee following authorization under this permit: Grading and Stabilization Activities Log... Description of Stabilization Measure”.
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records
- 5) During the inspection, treatment chemicals (EarthGuard) and mulch were observed sprayed on a gravel bar of North Fork Little Campbell Creek. Since the gravel bar is within the stream channel and below the ordinary high water mark (OHWM), treatment chemicals were therefore observed sprayed into waters of the United States (U.S.).
 - a) Permit part 4.6.3.2.3 states “Treatment chemicals shall not be applied directly to a waters of the U.S.”.
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(e) Duty to mitigate
- 6) Down-slope sediment controls were not observed adjacent to waterways. EarthGuard was observed sprayed on streambank slopes immediately adjacent to waterways without the use of any physical control measures.
 - a) Permit part 4.3.3 states “A permittee must establish and use down-slope sediment controls...for any portion of the down-slope and side-slope perimeter where storm water will be discharged from disturbed areas of the site.”, permit part 4.6.2.2 states “Prior to and after use, install appropriate physical control measures...to ensure effectiveness of the treatment chemical;”, permit part 4.6.3 states “The application of treatment chemicals shall be in combination with appropriate physical control measures...to ensure effectiveness of the treatment chemical. The use of treatment chemicals is not considered a substitute for appropriate physical control measures and does not preclude any other requirement of this permit.” and permit part 4.6.3.2.4 states “...Application through the use of manufactured products...shall be used in combination with adequate ditch check dams, settling basins, or other physical control measures designed to settle out chemically treated soils and minimize the presence of treatment chemicals before discharges reach waters of the U.S....”
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(e) Duty to mitigate
- 7) Employee training logs for ADOT and QAP in the SWPPP did not include treatment chemical training documentation.
 - a) Permit part 4.6.1.7 states “All person(s) who handle and apply treatment chemicals at the construction site must receive training in the proper handling and application of treatment chemicals. The names and titles of persons who receive training and the date(s) training occurred must be documented in the SWPPP in accordance with Part 5.8.2.7.” and permit part 4.6.2.3.3-4 states “Document the following in the SWPPP:...Title of training conducted, date, instructor name, and attendees. A permittee must train employees who handle treatment chemicals to comply with the information required by Part 4.6.1.”
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records

Such inaction is in violation of your permit.

To address the violation(s) described above, the Department requires that you do the following:

1. Explain why ADOT and QAP's modifications weren't submitted to DEC within 30 days of the decision to use treatment chemicals and describe how ADOT and QAP will ensure that NOI modifications are submitted to DEC within the required timeframe in the future.
2. Post both ADOT's and QAP's NOI modifications to the SWPPP entrance board and submit a photo to DEC showing the posted documentation.
3. Explain why the SWPPP was not updated to include the use of treatment chemicals. Update the SWPPP to include the requirements listed in permit part 4.6 and submit the documentation that was added to the SWPPP to DEC. Describe how ADOT and QAP will ensure that the SWPPP is updated appropriately in the future.
4. Explain why EarthGuard was not on the grading and stabilization log. Update the log appropriately and submit a copy of the updated log to DEC.
5. Explain why treatment chemicals were sprayed into Waters of the US and how ADOT and QAP will ensure that such action is prevented in the future.
6. Install appropriate down-slope sediment controls and physical control measures to ensure effectiveness of the treatment chemical and protect water bodies. Provide DEC with photos demonstrating how the corrective actions were made in the field at the locations identified in photo numbers 12, 16, 23, 24, 25 and 26 in the inspection report.
7. Conduct an appropriate handling and application of treatment chemicals training and update the SWPPP with the training documentation. Submit the training log to DEC with a synopsis of what the training covered. Describe how ADOT and QAP will ensure that the training is conducted appropriately in the future.

Please respond to this request by no later than **5/31/2018**. Deliverables can be submitted via mail, email, or fax:

Attention:

Catherine Beatty

555 Cordova Street, 3rd Floor

Anchorage, AK 99501

catherine.beatty@alaska.gov

Fax: 907. 269.4604

Penalties for violation of State statutes and regulations can be quite serious. In a civil action, a person who violates or causes or permits to be violated a provision of this statute, may be liable to the State for substantial monetary damages under AS 46.03.760. Depending on the nature of the violation, you may also be liable for the State's response costs under AS 46.03.822, for spill penalties under AS 46.03.758-759, for administrative penalties under AS 46.03.761, or for other kinds of damages or penalties under other statutes.

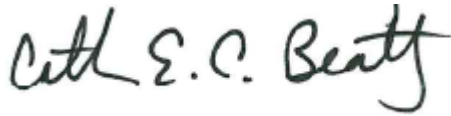
In a criminal violation, a person who acts with criminal negligence may be guilty of a Class A misdemeanor. AS 46.03.790. Upon conviction, a defendant who is not an organization may be sentenced to pay a fine not exceeding \$10,000.00 and/or sentenced to a definite term of imprisonment of not more than one year. Upon conviction, a defendant that is an organization may be sentenced to pay a fine not exceeding the greater of \$500,000.00 or an amount which is three times the pecuniary damage or loss caused by the defendant to another or property of another. AS 12.55.035; each day of violation may be considered a separate violation. Alaska laws allow the State to pursue both civil and criminal actions concurrently.

Nothing in this notice shall be construed as a waiver of the State's authority or as an agreement on the part of the State to forego judicial or administrative enforcement of the above-described violation(s) or to seek recovery

January 24, 2018

of damages, cost and penalties as prescribed by law. In addition, nothing herein shall be construed as a waiver of enforcement for past, present, or future violations not specifically set forth herein.

If you have additional questions, I may be contacted at (907) 269-7560, or via e-mail: catherine.beatty@alaska.gov.



Catherine Beatty, Enforcement Officer
Credential No. R-0308

Check One:

Personally Served

Sent by Certified Mail

7016 2070 0000 6899 1084 (ADOT)

7016 2070 0000 6899 1091 (QAP)

on the 24th day of January, 2018

Enclosure: APDES Inspection Report

cc: Amber Bennett, Environmental Program Specialist, DEC, w/enclosure
Katrina Chambon, Acting Environmental Program Manager, DEC, w/enclosure
Lisa Hart, Program Coordinator, DEC, w/enclosure
Rick Cool, NPDES Inspector, USEPA, w/enclosure
Mary Nan Cunningham, Regional Erosion and Sediment Control Advisor, ADOT, w/enclosure



APDES INSPECTION REPORT

Alaska Department of Environmental Conservation
 Division of Water
 555 Cordova Street, Anchorage, AK 99501

Section 1: General Data

Permit Number	Announced / Unannounced	Receiving Waters	Inspection Date
Number: AKR10FN16 & AKR10FN17	Announced	North and South Fork Little Campbell Creek Anchorage MS4	Date: 12/14/2017
Effective: 3/7/2017 & 3/10/2017			Entry Time: 9:30 AM
Expiration: 1/31/2021			Exit Time: 1:40 PM

Section 2: Facility Data

Name of Facility: Seward Highway: Dimond Boulevard to Dowling Road Reconstruction, Phase 1

On-Site Representative/Physical Address:

Name: Chong Kim
 Title: Project Engineer
 Address: 8200 Homer Drive, Anchorage, AK 99518
 Phone: (907) 244-8521 (cell)
 Email: chong.kim@alaska.gov

Name: Ray Butcher
 Title: Project Superintendent
 Address: 8200 Homer Drive, Anchorage, AK 99518
 Phone: (907) 522-2211
 Email: rbutcher@colaska.com

Latitude/Longitude at the outfall: 61.15584 N,
 -149.85560 W (Taken from NOI)

Responsible Party/Mailing Address:

Name: David Kemp
 Title: Regional Director ADOT&PF Central Region
 Address: PO Box 196900, Anchorage, AK 99519
 Phone: (907) 269-0770
 Email: david.kemp@alaska.gov

Name: Todd Porter
 Title: QAP General Manager
 Address: 240 W. 68th Avenue, Anchorage, AK 99518
 Phone: (907) 522-2211
 Email: cortega@colaska.com

Additional Inspection Participants:

Joshua James, ADOT
 Mary Nan Cunningham, ADOT
 Spencer Newins, QAP
 Jessica Farrell, EMC (ADOT subcontractor)
 Mike Fizette, QAP

For internal use only:

SIC: 1611 (Highway and Street Construction, Except Elevated Highways) and 1622 (Bridge, Tunnel and Elevated Highway Construction)

SEV: B0N41 Failure to maintain records
SEV: D0R12 Failure to submit required permit application information
SEV: BR19.A Failure to properly install / implement BMPs
SEV: A0M22 Narrative effluent violation

Section 3: Findings

Background/Regulatory Status/Compliance History

This construction project expands the Seward Highway from Dimond Boulevard to Dowling Road in Anchorage from four to six lanes, reconfigures highway ramps and frontage roads, constructs a new grade separation, builds a bridge and installs three new box culvert crossings.

No previous Alaska Department of Environmental Conservation (DEC) Division of Water inspections have been conducted for this project prior to the December 14, 2017 inspection.

This was an announced routine inspection that covers the time period of March 10, 2017-December 14, 2017.

Field Inspection

Upon arrival at Seward Highway: Dimond Boulevard to Dowling Road Reconstruction, Phase 1, introductions were exchanged and inspector credentials were presented.

The following information was provided verbally by onsite representatives:

- The purpose of this project is to improve safety and operating conditions and add capacity and connectivity to the stretch of the Seward Highway between Dowling Road and Dimond Boulevard.
- Construction began on March 14, 2017 and is expected to end in June 2019.
- The project had 24 hour coverage, with day and night shifts during the summer.
- The project went into winter shutdown on November 2, 2017.
- The middle portion of the project has been completed which includes the construction of a bridge, two box culverts installed at North Fork Little Campbell Creek and South Fork Little Campbell Creek, widening of the main line and lifting the highway 26 feet for the bridge installation. The remaining sections to be constructed include: the north and south ends of the project, ramps, frontage roads and a South Fork Little Campbell Creek box culvert.
- The project's acreage of land disturbance is 85 acres.
- Erosion and sediment control measures installed on-site at one time or another include: star wattles (inlets and check dams), witches hats, mud mats, silt fence, duck ponds under porta-potties and wash out areas, boars hair (inlet filter fabric), mulch for temporary stabilization and EarthGuard with mulch for winter shutdown's temporary stabilization.
- EarthGuard (polyacrylamide (PAM)) is mixed with hydroseed mulch so that it acts like a tracer to see where it has been applied. It will stabilize the soil for six months.
- Erosion and sediment controls currently still installed on-site include: silt fence, straw wattles for check dams, EarthGuard/hydroseed mulch, and riprap for down flumes.
- QAP's storm water pollution prevention plan (SWPPP) management staff are responsible for maintaining all control measures. Ms. Kysha Mallo was responsible from March 6, 2017 to March 29, 2017. Ms. Brittani Motoyama was responsible from March 29, 2017 to October 18, 2017. Mr. Spencer Newins has been responsible from October 19, 2017 to the present.
- There have been no reportable spills or leaks on-site during construction.
- On-site inspectors include Ms. Jessica Farrell (ADOT's representative) and a QAP representative. Ms. Farrell has been on the project since the start of construction. Ms. Mallo, Ms. Motoyama and Mr. Newins have split the time inspecting for QAP.
- Inspections were completed once every seven days, either on a Monday or Tuesday, but the designated inspection day was eventually changed to a Wednesday.
- Mr. Kim and Mr. Butcher sign the inspection reports for ADOT and QAP.
- The site was stabilized for winter shutdown by applying EarthGuard and mulch, installing rock flumes, check dams, asphalt and recycled asphalt pavement (RAP).
- There is a topsoil stockpile off of Abbott Road where the old north bound ramp used to be and it has been stabilized with EarthGuard and mulch.
- Fueling was done on-site, with a contractor coming to the site one to two times per day. The hazardous materials control plan states that fueling has to be done more than 100 meters away from a water source.
- No equipment washing was conducted on-site.
- The concrete washout was lined and moved around the project site quite a bit.

- The project had a stabilized entrance and exit that moved throughout the life of the project depending on where it was needed.
- The staging and material storage area is off of 74th and Brayton Drive and held traffic control devices, tools, pipe, best management practices (BMPs) and insulation board.
- Fertilizer has not been used on the project site yet, as there hasn't been any permanent stabilization applied. Vegetated mat was placed around the relocated portion of South Fork Little Campbell Creek.
- Excavation and dewatering occurred on-site. Water was pumped using silt bags into contained settling ponds before it was discharged to land. The project has excavation and dewatering permit coverage under authorization number AKG002074.
- A rain gauge is used to monitor rainfall.
- Two oil and grit (OGS) separators have been installed at 80th and Homer Drive and 70th and Homer Drive. Three more OGSs will be installed in 2018.

The following information was provided post-inspection:

- EarthGuard applicators included Cody Butcher (Operator/Nozzle Man) and Jordan Finke (Operator/Driver) under the direction of trained and AK-CESCL certified SWPPP Manager and SWPPP inspector.
- The mixing of EarthGuard and mulch was administered by the SWPPP Manager and SWPPP Inspector on-site based on the application and slope as indicated in the cut sheets.
- Equipment used to apply EarthGuard included a 3000 gallon capacity hydro mulch truck for half acre coverage.
- EarthGuard MSDS sheets and application rates were provided.
- EarthGuard was stored on-site in a secured material storage area connex.
- The EarthGuard (five gallon container) was purchased at Polar Supply on an as needed basis.

The following observations were made by ADEC inspectors:

- The project is currently in winter shutdown.
- There was no active discharge from the site observed during the inspection.
- NOIs and the SWPPP location were posted at the project entrances, however the most recently modified NOIs for both permittees were not posted on the SWPPP boards.
- The majority of the site was sprayed with EarthGuard and mulch to provide temporary stabilization for winter shutdown.
- Treatment chemicals (EarthGuard) and mulch were sprayed on a gravel bar of the North Fork of Little Campbell Creek, which is an anadromous stream.
- Down-slope sediment controls were not installed adjacent to waterways.
- EarthGuard was observed sprayed on streambank slopes immediately adjacent to waterways without the use of any physical control measures.

Sampling	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
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Records Review				
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The following records were reviewed as part of the inspection and are considered complete:

- Copy of the Construction General Permit (CGP)
- Copy of signed Notices of Intent (NOIs) and modifications (ADOT filed a modification on 12/13/17 for the use of treatment chemicals (EarthGuard) and updated the list of receiving waters; QAP filed a modification on 10/18/17 for the use of treatment chemicals (EarthGuard) and on 12/13/17 to update the list of receiving waters).
- DEC Authorizations for ADOT and QAP
- Inspection reports were completed at least once every seven days from 3/16/17 to 11/2/17.

- Site map
- Corrective Action Log- All corrective actions were completed within the time frame required and all items listed on inspection forms were on the log. The last entry was made on 9/20/17.
- Alaska Certified Erosion and Sediment Control Lead (AK-CESCL) and Certified Inspector of Sediment and Erosion Control (CISEC) certifications for all storm water staff were up to date.
- Rainfall monitoring data is entered on the daily record of rainfall log and on inspection reports.

The following records were reviewed as part of the inspection and are considered incomplete:

- SWPPP Modification Log- The log was last modified on 12/14/17, when NOI modifications were added to the SWPPP. The log does not show that the SWPPP was updated to include required items for the use of treatment chemicals on the project site.
- Grading and Stabilization Log – The only two stabilization measures listed on the log were “paved” and “mulched”. EarthGuard was not documented as a stabilization measure on the log, however, DEC was verbally told during the inspection that it was applied as a temporary stabilization measure on the site for winter shutdown.
- Employee training logs for ADOT and QAP in the SWPPP did not include treatment chemical training documentation.

Section 4: Compliance

Violations

- 1) ADOT did not file a NOI modification to include the use of treatment chemicals (EarthGuard) when QAP did on October 18, 2017. A modification was filed by ADOT on December 13, 2017, 56 days after QAP. More notably, NOIs were not filed by either permittee in April 2017 when ADOT approved the use of the treatment chemicals to be used on the site.
 - a) Permit part **2.7.1.5** states “A permittee must file an NOI modification form to DEC (see Part 2.3) to update or correct the following information on the original NOI within 30 calendar days of the change:... Change in decision to use or not use treatment chemicals...”
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records
 - c) Reference Document: Photo 10
- 2) The NOI modifications were not posted on the entrance boards to the site.
 - a) Permit part **5.10.2.1** states “...The sign or other notice must contain the following information: A copy of the completed NOI (and NOI modification) as submitted to DEC;..”
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records
 - c) Reference Document: Photo 28
- 3) The SWPPP amendment log does not show that the SWPPP was updated to include required items for the use of treatment chemicals on the project site. Therefore, the required treatment chemical documentation was not included in the SWPPP.
 - a) Permit part **4.6.2.3** states “Document the following in the SWPPP: Specific chemicals and chemical treatment systems used; Names and titles of person(s) who handle and apply treatment chemicals; Title of training conducted, date, instructor name, and attendees. A permittee must train employees who handle treatment chemicals to comply with the information required by Part 4.6.1...”
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records
 - c) Reference Document: Photo 04
- 4) EarthGuard was not documented as a stabilization measure on the grading and stabilization log, however, DEC was told during the inspection that it was applied as a temporary stabilization measure on the site for winter shutdown.

- a) Permit part 5.8.2.1.5 states “Summaries of the following information, or copies of the reports, must be maintained with the SWPPP by the permittee following authorization under this permit: Grading and Stabilization Activities Log... Description of Stabilization Measure”.
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records
 - c) Reference Document: Photo 06
- 5) During the inspection, treatment chemicals (EarthGuard) and mulch were observed sprayed on a gravel bar of North Fork Little Campbell Creek. Since the gravel bar is within the stream channel and below the ordinary high water mark (OHWM), treatment chemicals were therefore observed sprayed into waters of the United States (U.S.).
- a) Permit part 4.6.3.2.3 states “Treatment chemicals shall not be applied directly to a waters of the U.S.”.
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(e) Duty to mitigate
 - c) Reference Document: Photo 25
- 6) Down-slope sediment controls were not observed adjacent to waterways. EarthGuard was observed sprayed on streambank slopes immediately adjacent to waterways without the use of any physical control measures.
- a) Permit part 4.3.3 states “A permittee must establish and use down-slope sediment controls...for any portion of the down-slope and side-slope perimeter where storm water will be discharged from disturbed areas of the site.”, permit part 4.6.2.2 states “Prior to and after use, install appropriate physical control measures...to ensure effectiveness of the treatment chemical;”, permit part 4.6.3 states “The application of treatment chemicals shall be in combination with appropriate physical control measures...to ensure effectiveness of the treatment chemical. The use of treatment chemicals is not considered a substitute for appropriate physical control measures and does not preclude any other requirement of this permit.” and permit part 4.6.3.2.4 states “...Application through the use of manufactured products...shall be used in combination with adequate ditch check dams, settling basins, or other physical control measures designed to settle out chemically treated soils and minimize the presence of treatment chemicals before discharges reach waters of the U.S....”
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(e) Duty to mitigate
 - c) Reference Documents: Photos 12, 16, 23-25
- 7) Employee training logs for ADOT and QAP in the SWPPP did not include treatment chemical training documentation.
- a) Permit part 4.6.1.7 states “All person(s) who handle and apply treatment chemicals at the construction site must receive training in the proper handling and application of treatment chemicals. The names and titles of persons who receive training and the date(s) training occurred must be documented in the SWPPP in accordance with Part 5.8.2.7.” and permit part 4.6.2.3.3-4 states “Document the following in the SWPPP:...Title of training conducted, date, instructor name, and attendees. A permittee must train employees who handle treatment chemicals to comply with the information required by Part 4.6.1.”
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to comply; 18 AAC 83.405(k) Monitoring and records

Areas of Concern

A few SWPPP modifications were made after DEC contacted the permittees for an announced compliance inspection. While DEC acknowledges that the documentation was brought back into compliance prior to the inspection, DEC is concerned the announced inspection initiated the updates and the permittees would have been out of compliance had an inspection not occurred.

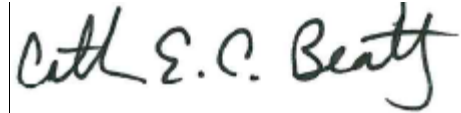
While DEC recognizes that the project site is currently inactive and in winter shutdown, silt fence was observed requiring maintenance on a few areas of the site (photos 15 and 21). These areas should be addressed prior to spring breakup so they function as intended.

Section 5: Appendixes

1. Photo Addendum

Signature

Inspector – Catherine Beatty
Credential Number: R-0308
Phone: (907) 269-7560
E-mail: catherine.beatty@alaska.gov



X

Reviewed By – Paul Winter
Credential Number: R-0152
Phone: (907)269-8117
E-mail: paul.winter@alaska.gov

Date: 1/22/2018



X

Date: 1/23/2018

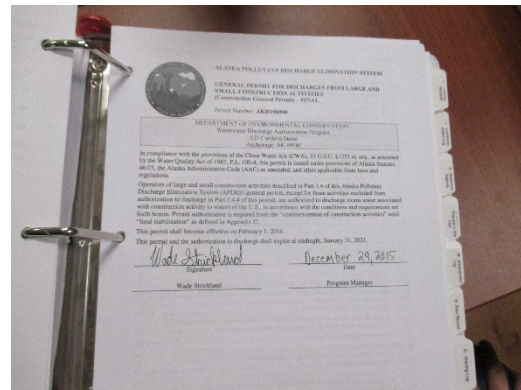
Photo Addendum

Photo 01



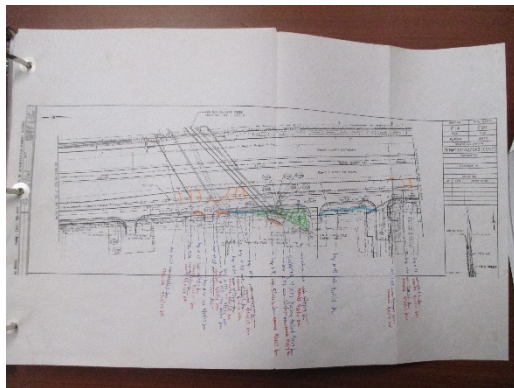
Project site map

Photo 02



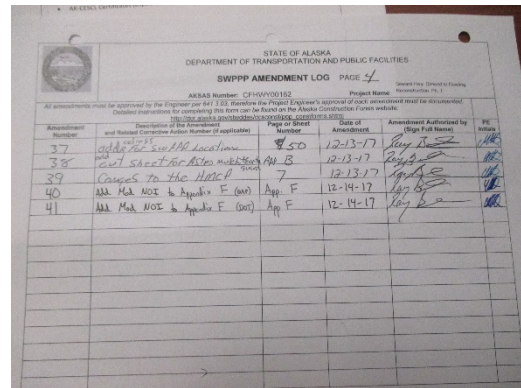
Copy of CGP on-site

Photo 03



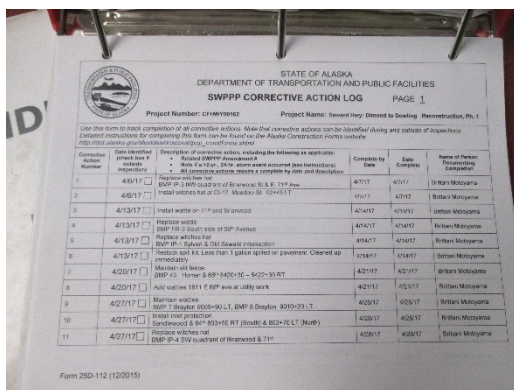
Project site map (page 10 of 38)

Photo 04



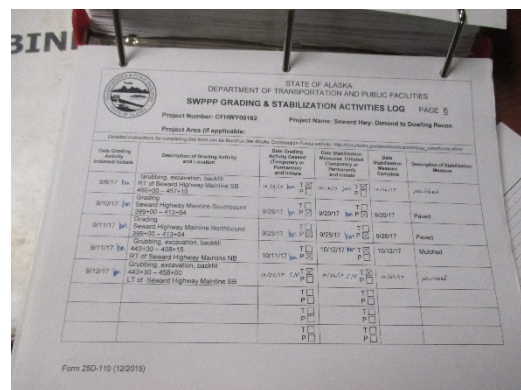
SWPPP amendment log (page 4 of 4) for amendments made on 12/13/2017 and 12/14/2017

Photo 05



SWPPP corrective action log (page 1 of 4)

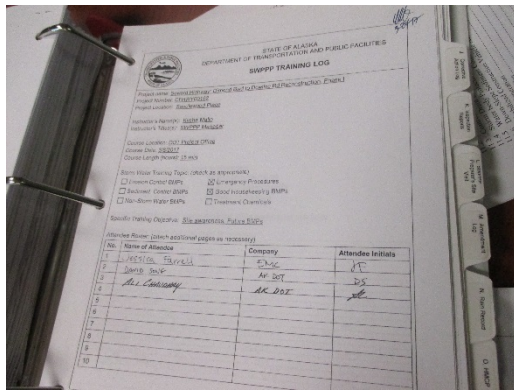
Photo 06



SWPPP grading and stabilization log (page 6 of 6) for activities ending 10/27/17

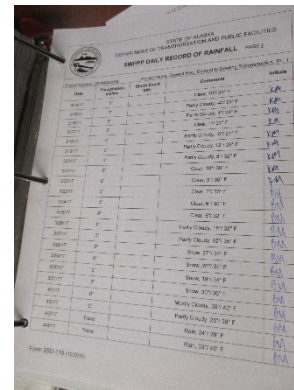
Photo Addendum

Photo 07



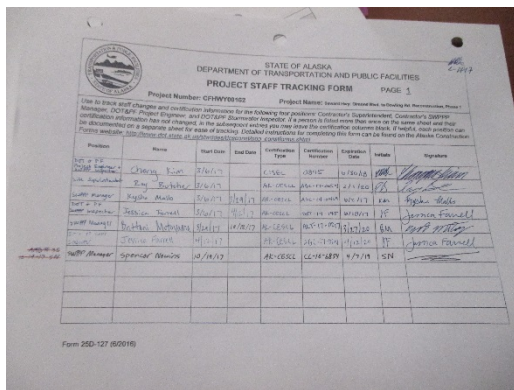
SWPPP training log

Photo 08



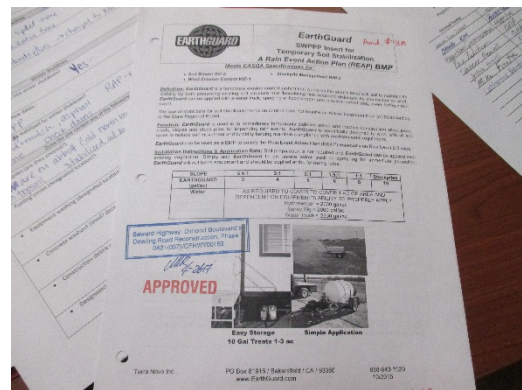
SWPPP daily record of rainfall log

Photo 09



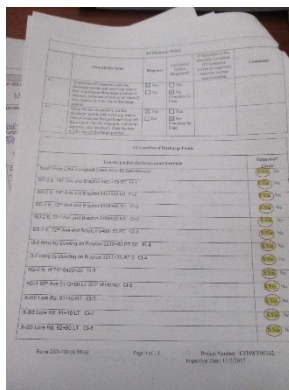
Project staff tracking form

Photo 10



SWPPP insert for EarthGuard approved for use on 4/27/17

Photo 11



Inspection report

Photo 12



South Fork Little Campbell Creek box culvert outlet lacking down-slope sediment control measures/physical controls

Photo Addendum	
Photo 13	Photo 14
	
EarthGuard (PAM) and mulch stabilization	OGS at 80 th and Homer Drive
Photo 15	Photo 16
	
South Fork Little Campbell Creek perimeter control requiring maintenance	South Fork Little Campbell Creek reconstruction area lacking down-slope sediment control measures/physical controls
Photo 17	Photo 18
	
Straw wattles along South Fork Little Campbell Creek as it enters the site	Topsoil stockpile hydroseeded with EarthGuard (PAM)

Photo Addendum	
Photo 19	Photo 20
	
Material storage area	Lore Road and Brayton Road drainage
Photo 21	Photo 22
	
74 th and Brayton staging areas with silt fence requiring maintenance	72 nd and Brayton drainage with wattles
Photo 23	Photo 24
	
North Fork Little Campbell Creek box culvert with EarthGuard application and lacking down-slope sediment control measures/physical controls	North Fork Little Campbell Creek box culvert with EarthGuard (PAM) application and lacking down-slope sediment control measures/physical controls

Photo Addendum	
Photo 25	Photo 26
<p>EarthGuard (PAM) sprayed on gravel bar near inlet of North Fork Little Campbell Creek</p>	<p>Outlet of North Fork Little Campbell Creek</p>

Photo 27	Photo 28
<p>Old temporary bypass of North Fork Little Campbell Creek</p>	<p>SWPPP location and NOIs posted at Sandewood Place and 84th without NOI modifications posted</p>