



COLORADO

Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

June 18, 2015

James M. Johnson, Registered Agent
G.E. Johnson Construction Company, Inc.
25 N. Cascade Ave., Suite 400
Colorado Springs, CO 80903

Certified Mail Number: 7005 1820 0000 3209 6122

**RE: Expedited Settlement Agreement Offer
Gunnison County Courthouse / CDPS Permit Certification # COR-03L681**

Dear Mr. Johnson,

Enclosed for your records is G.E. Johnson Construction Company's copy of the recently executed Expedited Settlement Agreement ("ESA"). Please be advised that the first page of the ESA was revised to reflect the correct ESA Number.

As specified in paragraph ten of the enclosed ESA, G.E. Johnson Construction Company must, within fifteen calendar days, submit a certified or cashier's check for the amount specified in paragraph four of the ESA to the Water Quality Control Division in order to resolve the matter.

If you have any questions, please do not hesitate to contact me at 303.692.6498 or andrea.beebout@state.co.us.

Sincerely,

Andrea Beebout, Enforcement Specialist
Clean Water Enforcement Unit
WATER QUALITY CONTROL DIVISION

Enclosures: Expedited Settlement Agreement (ESA) ES-150618-1

cc: Enforcement File

ec: Natasha Davis, EPA Region VIII
Crystal Lambert, Gunnison County
Nicole Rowan, Watershed Section, CDPHE
Michael Beck, Grants and Loans, CDPHE
Amy Zimmerman, Engineering Section, CDPHE
Heather Drissel, Field Services Unit 2, CDPHE
Lillian Gonzalez, Permits Unit 1, CDPHE
Nathan Moore, Clean Water Compliance Unit, CDPHE
Tania Watson, Data Management, CDPHE





Colorado Department of Public Health & Environment
Water Quality Control Division

EXPEDITED SETTLEMENT AGREEMENT

Number: ES-150618-1

The Colorado Department of Public Health and Environment (“Department”), through the Water Quality Control Division (“Division”), issues this Expedited Settlement Agreement (“ESA”), pursuant to the Division’s authority under §§25-8-602, 25-8-605 and 25-8-608, C.R.S. of the Colorado Water Quality Control Act (the “Act”) §§25-8-101 to 703, C.R.S., and its implementing regulations, with the express consent of G.E. Johnson Construction Company, Inc. (“G.E. Johnson”). The Division and G.E. Johnson may be referred to collectively as “the Parties.”

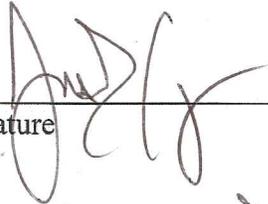
1. G.E. Johnson is a “person” as defined under the Water Quality Control Act, §25-8-103(13), C.R.S. and its implementing permit regulation, 5 CCR 1002-61, §61.2(73).
2. G.E. Johnson is conducting construction activities to build the Gunnison County Courthouse located in or near the City of Gunnison, Gunnison County, Colorado (the “Project”).
3. G.E. Johnson, as described in the attached inspection reports, failed to comply with the provisions of its Colorado Discharge Permit System General Permit for Stormwater Discharges Associated with Construction Activity (“Permit”), Certification Number COR-03L681. The inspection reports are attached hereto as Attachment A and Attachment B and are incorporated herein by reference.
4. The parties enter into this ESA in order to resolve the matter of civil penalties associated with the violation(s) alleged herein and in the attached inspection report for a penalty of \$ 4,000.00.
5. By accepting this ESA, G.E. Johnson neither admits nor denies the violations or deficiencies specified herein and in the attached inspection report.
6. G.E. Johnson certifies that all deficiencies identified in the attached inspection report have been corrected and that the Project is currently in full compliance with the terms and provisions of the Permit. Additionally, G.E. Johnson has attached to this ESA: (1) a written description detailing how the deficiencies were corrected; and (2) representative photographs documenting the current conditions and the associated BMPs implemented at the Project.
7. G.E. Johnson agrees to the terms and conditions of this ESA. G.E. Johnson agrees that this ESA constitutes a notice of alleged violation and an order issued pursuant to §§25-8-602, 25-8-605 and 25-8-608, C.R.S., and is an enforceable requirement of the Act. By signing the ESA, G.E. Johnson waives: (1) the right to contest the finding(s) specified herein and in the attached inspection report; and (2) the opportunity for a public hearing pursuant to §25-8-603, C.R.S.
8. This ESA is subject to the Division’s “Public Notification of Administrative Enforcement Actions Policy,” which includes a thirty-day public comment period. The Division and G.E. Johnson each reserve the right to withdraw consent to this ESA if comments received during the thirty-day period result in any proposed modification to the ESA.

9. This ESA constitutes a final agency order or action upon the date when the Executive Director or his designee signs the ESA and effectively imposes the civil penalty.
10. G.E. Johnson agrees that within fifteen (15) calendar days of receiving the signed and final ESA from the Division, G.E. Johnson shall submit a certified or cashier's check drawn to the order of the "Colorado Department of Public Health and Environment," for the amount specified in paragraph 4 above, to:

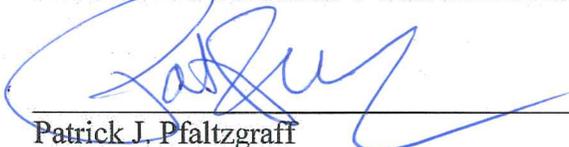
Andrea Beebout
 Colorado Department of Public Health and Environment
 Water Quality Control Division
 Mail Code: WQCD-CWE-B2
 4300 Cherry Creek Drive South
 Denver, Colorado 80246-1530

11. Notwithstanding paragraph 5 above, the violations described in this ESA will constitute part of G.E. Johnson's compliance history for purposes where such history is relevant. This includes considering the violations described above in assessing a penalty for any subsequent violations against G.E. Johnson. G.E. Johnson agrees not to challenge the use of the cited violations for any such purpose.
12. This ESA, when final, is binding upon G.E. Johnson and its corporate subsidiaries or parents, their officers, directors, employees, successors in interest, and assigns. The undersigned warrant that they are authorized to legally bind their respective principals to this ESA.

ACCEPTED BY G.E. JOHNSON CONSTRUCTION COMPANY, INC.:

 Signature	4/28/15 Date
JUSTIN D COOPER Name (printed)	VICE PRESIDENT Title

FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT:

 Patrick J. Pfaltzgraff WATER QUALITY CONTROL DIVISION	Date: 18 Jun 15
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COLORADO

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November 3, 2014

Dan Starr, Vice President
GE Johnson Construction, Inc.
25 North Cascade Avenue, Suite 400
Colorado Springs, Colorado 80903
starrd@gejohnson.com

Re: Facility Inspection / Compliance Advisory
GE Johnson Construction, Inc. – Gunnison County Courthouse
CDPS Permit No. COR03L681
Gunnison County

Mr. Starr:

An inspection of the above-referenced facility was conducted by the Water Quality Control Division (the division) on September 30, 2014. The inspection procedure consisted of two parts, a review of records and an on-site facility inspection. Findings identified during the inspection are detailed in the enclosed inspection report.

This correspondence documents:

1. The division's expectations for correcting the inspection findings.
2. The division's determination on whether the findings meet established criteria for formal enforcement.
3. If the division requires a response to the inspection report.

Corrective Action

All discharges authorized by the Colorado Discharge Permit System (CDPS) General Permit for Stormwater Discharges Associated with Construction Activity (COR030000) (the permit) must be consistent with all requirements, and terms and conditions of the permit. Therefore, the division expects GE Johnson Construction, Inc. (the permittee) to correct all findings identified in the enclosed inspection report and return the facility to compliance with the permit. A violation of the terms and conditions specified in this permit may be subject to civil and criminal liability pursuant to sections 25-8-601 through 612, C.R.S. Correcting a permit violation does not remove the original violation.

The division evaluated the inspection findings against the division's Stormwater Enforcement Response Guide and has determined that, at this time, the findings identified in the enclosed inspection report **do not** meet the criteria for a formal enforcement response. However, while an enforcement action is not currently pending for this facility based on the enclosed inspection findings, the identified findings could be included in a future enforcement response if new information, including new or ongoing violations, is discovered at a later date.



GE Johnson Construction, Inc. – Gunnison County Courthouse

November 3, 2014

Because the findings identified in the enclosed inspection report do not currently warrant formal enforcement, the permittee is not required to submit a written response to the enclosed inspection report.

This Compliance Advisory is intended to advise the inspected entity of alleged violations of the Colorado Water Quality Control Act, its implementing regulations and permits so that appropriate steps can be taken to avoid or mitigate formal enforcement action or to correct our records (if applicable). This Compliance Advisory does not constitute a Notice of Violation or Cease and Desist Order and is not subject to appeal. The issuance of this Compliance Advisory does not limit or preclude the division from pursuing its enforcement options concerning the above violation(s). The division will evaluate the facts associated with the above-described violation(s) and if a formal enforcement action is deemed necessary, the inspected entity may be issued a Notice of Violation / Cease and Desist Order that may include the assessment of penalties.

If you have any questions, please call me at 303-692-2356.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Campbell".

Joe Campbell
Environmental Protection Specialist
Clean Water Compliance Unit
WATER QUALITY CONTROL DIVISION

cc: Gunnison County
File Copy

Stormwater Inspection Report

Permittee: GE Johnson Construction, Inc. Cert# COR03L681 Report Date: November 3, 2014

Facility: Gunnison County Courthouse Rec. Water(s) Gunnison River

Facility Address: 200 East Virginia Avenue, Gunnison, Colorado 81230

Persons Present: Joe Campbell (CDPHE-WQCD); Kathy Kaiser, Simon Salazar, Tyler Baker (GE Johnson)

Legally Responsible Person / Title: Dan Starr / Vice President Inspector: Joe Campbell

Inspection Began: 9/30/14 1:00pm

Inspection Completed: 9/30/14 3:00pm

Inspection Findings

The Water Quality Control Division (division) inspector held a closing conference at the conclusion of the inspection, during which the inspector reviewed all alleged inspection findings with the facility representative. The inspector communicated the division's expectation that the facility representative initiate corrective actions, immediately, for all alleged inspection findings, in accordance with the provisions of the CDPS General Permit for Stormwater Discharges Associated with Construction Activity (the permit).

RECORDS REVIEW

Note 1: In a communication with the permittee prior to the inspection, the division inspector requested an additional copy of the Stormwater Management Plan (SWMP), supporting documents and inspection records be provided to division personnel at the inspection. The copy of the SWMP, supporting documents and inspection records were provided to the division inspector on September 30, 2014 during the inspection.

Note 2: The permit certification effective date was January 28, 2014. The date that construction started and land-disturbing activities began at the site was February 10, 2014 and the area of disturbance at the time of the inspection was 1.5 acres as provided by Kathy Kaiser / EPS.

1. A copy of the SWMP was retained onsite. The division inspector reviewed the SWMP and found it to be inadequate for the following reasons:
 - a) The Site Description section did not adequately describe items listed below as required by Part I.C.1 of the permit. Specifically, the geothermal drilling operations conducted at the site and the associated drilling mud were not discussed in the SWMP. The SWMP shall clearly describe the construction activity, and include:
 - o All potential pollutant sources

The division expects the permittee to update the Site Description section of the SWMP to include all items required by the permit.

- b) The Stormwater Management Controls section did not describe the installation and implementation specifications for items observed during the field inspection and listed below as required by Part

I.C.3.c of the permit. Specifically, the installation and implementation specification for the plastic wrap secondary containment utilized at the masonry batch plant was not included in the SWMP. .

The SWMP shall clearly describe the installation and implementation specifications for all control measures used to control pollutants in stormwater discharges at the site.

The division expects the permittee to update the stormwater management controls to include all items as required by the permit.

2. Inspection records were available for review during the inspection. Upon review, the inspection records were found to be adequate. Inspection records from June 30, 2014 through September 30, 2014 were reviewed by the inspector.

SITE INSPECTION

Note 4: As required by Part I.D.2 of the permit all control measures mentioned in the following findings must be:

- Selected, installed, implemented and maintained according to good engineering, hydrologic and pollution control practices.
- Consistent with the installation and implementation specifications identified in the SWMP.
- Designed to provide control for all potential pollutant sources associated with the construction activity and to prevent pollution or degradation of state waters.

Note 5: The findings identified below provide specific observations of field deficiencies. It remains the permittee's responsibility to ensure that all permit requirements, terms and conditions are met for the entire construction site.

1. It was noted during the inspection that control measures were not implemented to manage pollutant contributions to stormwater runoff from masonry waste located at the southwest corner of the site building (refer to photograph 1).
 - Control Measure Observation: Control measures were not implemented to control stormwater runoff from the location and pollutant source noted above.
 - Masonry waste was observed on the ground at the southwest corner of the site building.
 - Control Measure Finding: Control measures were not implemented to manage stormwater runoff from the above listed pollutant source as required by the permit.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from this area of the site flows to a drainage ditch along the western site boundary. The drainage ditch flows to a storm sewer inlet and eventually discharges to the Gunnison River. Additional adequate vegetated buffer and grade differential control measures were implemented down gradient of this location.
 - Result: There was a potential discharge of pollutants to the following state water(s): Gunnison River
 - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.
 - All site wastes must be properly managed to prevent potential pollution of state waters. This permit does not authorize on-site waste disposal.
2. It was noted during the inspection that control measures were not implemented to manage pollutant contributions to stormwater from sediment from disturbed areas located at the northern site entrance (refer to photograph 2).
 - Control Measure Observation: Control measures were not implemented to control stormwater runoff from the location and pollutant source noted above.
 - A VTC pad was not installed at the northern site entrance.

- Control Measure Finding: Control measures were not implemented to manage stormwater runoff from the above listed pollutant source as required by the permit.
- Stormwater runoff from this area is discharged as follows: Surface runoff from this area of the site flows to the curb line along the northern site boundary. The curb line flows to a storm sewer inlet and eventually discharges to the Gunnison River. Additional adequate control measures were not implemented down gradient of this location.
- Result: There was a potential discharge of pollutants to the following state water(s): Gunnison River
- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Facilities must implement the provisions of the SWMP as written and updated, from commencement of construction activity until final stabilization is complete, as a condition of this permit.
 - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.
 - Practices must be implemented for all areas of potential vehicle tracking, and can include: minimizing site access; street sweeping or scraping; tracking pads; graveled parking areas; requiring that vehicles stay on paved areas on-site; wash racks; contractor education; and/or sediment control measures, etc.

3. It was noted during the inspection that control measures were not implemented to manage pollutant contributions to stormwater from sediment from disturbed areas located along the eastern boundary of the site (refer to photograph 3).

- Control Measure Observation: Control measures were not implemented to control stormwater runoff from the location and pollutant source noted above.
 - Perimeter control measures were not implemented along the eastern boundary on the northern portion of the site.
- Control Measure Finding: Control measures were not implemented to manage stormwater runoff from the above listed pollutant source as required by the permit.
- Stormwater runoff from this area is discharged as follows: Surface runoff from this area of the site flows to a drainage ditch along the eastern site boundary. The drainage ditch flows to a storm sewer inlet and eventually discharges to the Gunnison River. Additional adequate control measures were not implemented down gradient of this location.
- Result: There was a potential discharge of pollutants to the following state water(s): Gunnison River
- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.



Photograph 1: Masonry waste on the ground near the southwest corner of the site building.



Photograph 2: Vehicle tracking control was not installed at the northern site entrance.



Photograph 3: Perimeter control measures were not installed along the northeastern site boundary.



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Department of Public
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December 23, 2014

CERTIFIED NO: 7007 0220 0001 0163 0919

Dan Starr, Vice President
GE Johnson Construction, Inc
25 North Cascade Avenue, Suite 400
Colorado Springs, Colorado 80903
starrd@gejohnson.com

Re: Facility Inspection / Compliance Advisory
GE Johnson Construction, Inc – Gunnison County Courthouse
CDPS Permit No. COR03L681

Mr. Starr:

An inspection of the above-referenced facility was conducted by the Water Quality Control Division (the division) on November 25, 2014. The inspection procedure consisted of two parts, a review of records and an on-site facility inspection. Findings identified during the inspection are detailed in the enclosed inspection report.

This correspondence documents:

1. The division's expectations for correcting the inspection findings.
2. The division's determination on whether the findings meet established criteria for formal enforcement.
3. If the division requires a response to the inspection report.

Corrective Action

All discharges authorized by the Colorado Discharge Permit System (CDPS) General Permit for Stormwater Discharges Associated with Construction Activity (COR030000) (the permit) must be consistent with all requirements, and terms and conditions of the permit. Therefore, the division expects GE Johnson Construction, Inc (the permittee) to correct all findings identified in the enclosed inspection report and return the facility to compliance with the permit. A violation of the terms and conditions specified in this permit may be subject to civil and criminal liability pursuant to sections 25-8-601 through 612, C.R.S. Correcting a permit violation does not remove the original violation.

The division evaluated the inspection findings against the division's Stormwater Enforcement Response Guide and has determined that the findings identified in the enclosed inspection report **meet** the criteria for a formal enforcement response. The following discussion provides the division's expectation for the inspected entity's response to the inspection report, and information regarding response adequacy and future division communication.



GE Johnson Construction, Inc – Gunnison County Courthouse
December 23, 2014

- a. Consistent with section 61.8(3) of 5 CCR 1002-61 (Regulation No. 61) and Part II.B.2 of the CDPS General Permit for Stormwater Discharges Associated with Construction Activity, the inspected entity must submit a response to the Division that documents the corrective action(s) implemented for each finding identified in the enclosed inspection report. Unless specifically requested by the Division, the inspected entity is not required to submit a copy of the revised Stormwater Management Plan with the response.
- b. Also consistent with section 61.8(3) of 5 CCR 1002-61 (Regulation No. 61) and Part II.B.2 of the CDPS General Permit for Stormwater Discharges Associated with Construction Activity, the inspected entity must submit to the division any previous versions of the Stormwater Management Plan that are believed to provide information that is noted as missing or inadequate in this inspection report.
- c. The inspected entity is encouraged to provide any additional information they feel should be considered by the division with respect to any finding identified in the enclosed inspection report. The division will evaluate this information, and may modify the Compliance Determination if the information demonstrates the finding was not accurate.

The inspected entity must submit the response and additional requested information to the Colorado Department of Public Health and Environment, WQCD-P-B2, 4300 Cherry Creek Drive South, Denver, CO 80246-1530, Attn: Joe Campbell, by COB January 6, 2015.

- d. Following receipt and review of the inspected entity's response (as identified in a. above), the division will identify whether all inspection findings were adequately addressed and whether there is, or is not, evidence of continuing noncompliance and potential for continued penalty liability for ongoing violations. The division intends to communicate this determination, in writing, within 30 days following the receipt of an inspected entity's response, or will provide a revised schedule if additional time is required to complete the division evaluation. If the division determines the inspection findings have not been adequately addressed, the division response will provide notification of the continued noncompliance and the need for corrective action.
- e. The division's standard enforcement response process includes the issuance of a Notice of Violation/Cease and Desist Order. The division has an internal time control goal of 180 days to issue a formal enforcement action for identified noncompliance meeting the established criteria for formal enforcement. If the division determines that it will not meet its internal time control goal, the division will provide written notification to the permittee within 180 days of the date of the inspection. If, at any time, the division determines that it will forego a formal enforcement response for the identified noncompliance, the division will provide written notification to the permittee at the time that decision is made.

This Compliance Advisory is intended to advise the GE Johnson Construction, Inc of potential violations of the Colorado Water Quality Control Act, its implementing regulations and permits so that appropriate steps can be taken to avoid or mitigate formal enforcement action or to correct our records (if applicable). This Compliance Advisory does not constitute a Notice of Violation or Cease and Desist Order and is not subject to appeal. The issuance of this Compliance Advisory does not limit or preclude the Division from pursuing its enforcement options concerning the potential violation(s). The Division will evaluate the facts associated with the potential violation(s) and if a

GE Johnson Construction, Inc – Gunnison County Courthouse
December 23, 2014

formal enforcement action is deemed necessary, you may be issued a Notice of Violation / Cease and Desist Order that may include the assessment of penalties.

If you have any questions, please call me at 303-692-2356.

Regards,

A handwritten signature in black ink, appearing to read "Joe Campbell". The signature is fluid and cursive, with the first name "Joe" and last name "Campbell" clearly distinguishable.

Joe Campbell
Environmental Protection Specialist
Clean Water Compliance Unit
WATER QUALITY CONTROL DIVISION

cc: Gunnison County
File Copy

Stormwater Inspection Report

Report Date: December 22, 2014

Permittee: GE Johnson Construction, Inc

Cert#: COR03L681

Legally Responsible Person: Dan Starr

Title: Vice President

Facility: Gunnison County Courthouse

Receiving Water: Gunnison River

Address: 200 East Virginia Avenue, Gunnison, Colorado
81230

MS4/County: Gunnison County

Persons Present: Tyler Baker, Kathy Kaiser, Simon Salazar (GE Johnson); Joe Campbell (WQCD)

Inspector: Joe Campbell

Inspection Began: 11/25/14 11:30 AM

Inspection Completed: 11/25/14 1:15 PM

Inspection Findings

The Water Quality Control Division (division) inspector held a closing conference at the conclusion of the inspection, during which the inspector reviewed all alleged inspection findings with the facility representative. The inspector communicated the division's expectation that the facility representative initiate corrective actions, immediately, for all alleged inspection findings, in accordance with the provisions of the CDPS General Permit for Stormwater Discharges Associated with Construction Activity (the permit).

RECORDS REVIEW

Note 1: In a communication with the permittee prior to the inspection, the division inspector requested an additional copy of the Stormwater Management Plan (SWMP), supporting documents and inspection records be provided to division personnel at the inspection. The copy of the SWMP, supporting documents and inspection records were provided to the division inspector on November 25, 2014 during the inspection.

Note 2: The permit certification effective date was January 28, 2014. The date that construction started and land-disturbing activities began at the site was February 10, 2014 and the area of disturbance at the time of the inspection was 1.5 acres as provided by Kathy Kaiser / Environmental Specialist.

1. A copy of the SWMP Was retained onsite. The division inspector reviewed the SWMP and found it to be adequate.
2. Inspection records were available for review during the inspection. Upon review, the inspection records were found to be inadequate. Inspection records from September 29, 2014 through November 24, 2014 were reviewed by the inspector.
 - a) Maintenance of control measures was not performed and/or documented as required by Part I.D.8 of the permit. Specifically, corrective actions for the field findings identified during the September 30, 2014 WQCD field inspection were not documented as being completed on any inspection report forms. Therefore, according to the inspection records in the SWMP and findings documented in the Site Inspection part of this report, the field findings identified during the initial inspection are considered still unresolved as of the date of this inspection, 56 days later.

The permit requires that:

- Where site inspections note the need for maintenance or replacement, control measures must be maintained in accordance with the SWMP and Part I.D.7 of the permit. Control measures that are not adequately maintained in accordance with good engineering, hydrologic and pollution control practices, including removal of collected sediment outside the acceptable tolerances of the control measure, are considered to be no longer operating effectively.
- Repair, replacement, or installation of new control measures determined necessary during site inspections to address ineffective or inadequate control measures must be conducted in accordance with Part I.D.8 of the permit. Control measures considered to no longer be operating effectively resulting in noncompliance with the permit must be addressed as soon as possible, immediately in most cases, to minimize the discharge of pollutants.
- SWMP updates required as a result of deficiencies in the SWMP noted during site inspections shall be made in accordance with Part I.D.5.c of the permit.

The division expects the permittee to maintain control measures in accordance with good engineering, hydrologic and pollution control practices, within the prescribed timeframe, as required by the permit.

SITE INSPECTION

Note 3: As required by Part I.D.2 of the permit all control measures mentioned in the following findings must be:

- Selected, installed, implemented and maintained according to good engineering, hydrologic and pollution control practices.
- Consistent with the installation and implementation specifications identified in the SWMP.
- Designed to provide control for all potential pollutant sources associated with the construction activity and to prevent pollution or degradation of state waters.

Note 4: The findings identified below provide specific observations of field deficiencies. It remains the permittee's responsibility to ensure that all permit requirements, terms and conditions are met for the entire construction site.

1. It was noted during the inspection that control measures were not implemented to manage pollutant contributions to stormwater runoff from sediment from disturbed areas located at the northeast and northwest site entrances (refer to photographs 1-2).
 - Control Measure Observation: Control measures were not implemented to control stormwater runoff from the locations and pollutant source noted above. Specifically,
 - It was evident that areas on the northeast and northwest portions of the site were utilized for site ingress and egress and VTC pads were not installed at either of those site entrances.
 - Control Measure Finding: Control measures were not implemented to manage stormwater runoff from the above listed pollutant source as required by the permit.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from this area of the site flows to the curb line along the northern site boundary. The curb line flows to a storm sewer inlet and eventually discharges to the Gunnison River. Additional control measures were not implemented down gradient of this location.
 - Result: There was a potential discharge of pollutants to the following state water(s): Gunnison River
 - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Facilities must implement the provisions of the SWMP as written and updated, from commencement of construction activity until final stabilization is complete, as a condition of this permit.
 - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.
 - Practices must be implemented for all areas of potential vehicle tracking, and can include: minimizing site access; street sweeping or scraping; tracking pads; graveled parking areas; requiring that vehicles stay on paved areas on-site; wash racks; contractor education; and/or sediment control measures, etc.

2. It was noted during the inspection that control measures were not implemented to manage pollutant contributions to stormwater from sediment from disturbed areas located along the eastern boundary of the site (refer to photographs 3-5).
 - Control Measure Observation: Control measures were not implemented to control stormwater runoff from the location and pollutant source noted above. Specifically,
 - Perimeter control measures were not implemented near the drainage swale along the eastern portion of the site boundary. Two areas of disturbance were noted as being directly adjacent to the drainage swale.
 - Control Measure Finding: Control measures were not implemented to manage stormwater runoff from the above listed pollutant source as required by the permit.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from this area of the site flows to the adjacent drainage swale along the eastern site boundary. The drainage swale flows to a storm sewer inlet and eventually discharges to the Gunnison River. Additional control measures were not implemented down gradient of this location.
 - Result: There was a potential discharge of pollutants to the following state water(s): Gunnison River
 - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.



Photograph 1: Vehicle tracking control was not installed at the northeast site entrance.



Photograph 2: Vehicle tracking control was not installed at the northwest site entrance.



Photograph 3: Perimeter controls were not installed along the drainage swale on the eastern portion of the site.



Photograph 4: Perimeter controls were not installed along the drainage swale on the eastern portion of the site.



Photograph 5: Perimeter controls were not installed along the drainage swale on the eastern portion of the site.