



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Environmental
Conservation

Division of Water
Anchorage

555 Cordova Street
Anchorage, AK 99501
Main: 907.269.6285
Fax: 907.334.2415
www.dec.alaska.gov

7/17/2024

Sean Holland
Regional Director
Alaska Dept. of Transportation and Public Facilities
P.O. Box 196900
Anchorage, AK 99519

SUBJECT: APDES Inspection of ANC Taxiway Z West Improvements, Authorization Number
AKR10H0AH

Dear Mr. Porter:

Per the Alaska Pollutant Discharge Elimination System, an inspection of the project located on Ted Stevens Anchorage International Airport and named ANC Taxiway Z West Improvements was conducted on June 19, 2024. We would like to provide you with a copy of the inspection report for your records. Thank you for your cooperation and assistance regarding this inspection and for your efforts in protecting human health and the environment.

Sincerely,

A handwritten signature in cursive script that reads "Rachel Newell".

Rachel Newell, Enforcement Officer

Credential No. R-0625

Check One:

- ☐ Personally served
- ☐ Sent by certified mail
- ☒ Sent by email

on the 17th day of July, 2024

Enclosure: Inspection Report

cc:

DEC.Water.APDESData@alaska.gov

Nicole Warner, DEC

Jon Wendel, DEC



APDES INSPECTION REPORT

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

Section 1: General Data

APDES Authorization	Announced / Unannounced	Receiving Waters	Inspection Date
Number: AKR10H0AG and AKR10H0AH	Announced	Lake Hood/Spenard Cook Inlet Wetland	Date: 6/19/2024
Effective: 6/16/2023			Entry Time: 9:00 am
Expiration: 1/31/2026			Exit Time: 12:30 pm

Section 2: Facility Data

Name of Project: ANC Taxiway Z West Improvements

On-Site Representative/Physical Address:

AKR10H0AG
Tyler Rickabaugh
Environmental Coordinator
COLASKA, Inc., dba QAP
240 W. 68th Avenue
Anchorage, AK 99518
trickabaugh@colaska.com

AKR10H0AH
Jim Rasi
Project Engineer
EMC Engineering/ Alaska DOT&PF
P.O. Box 196900
Anchorage, AK 99519
jimrasi@emcalaska.com

Latitude/Longitude of the project:

61.17416, -149.99819

Responsible Party/Mailing Address:

AKR10H0AG
Todd Porter
General Manager
COLASKA, Inc. dba QAP
240 W. 68th Avenue
Anchorage, AK 99518
907-522-2211 (Office)
cortega@colaska.com

AKR10H0AH
Sean Holland
Regional Director
Alaska DOT&PF
P.O. Box 196900
Anchorage, AK 99519
sean.holland@alaska.gov

Additional Inspection Participants:

Ben Button, QAP
Ray Butcher, QAP Superintendent
Jordan Ortega, QAP SWPPP Manager
Noah Wright, EMC Engineering SWPPP Manager
Joshua James, Alaska DOT&PF

For internal use only:

Off-Site Compliance Evaluation: ☐ Yes ☒ No
NAICS:

Section 3: Findings

Background/Regulatory Status/Compliance History

The State of Alaska Department of Transportation and Public Facilities (Alaska DOT&PF, or DOT) and Quality Asphalt Paving (QAP) are each authorized to discharge storm water from the ANC Taxiway Z West Improvements project per the Alaska Pollutant Discharge Elimination System (APDES) Construction General Permit AKR100000, authorizations numbered AKR10H0AG (QAP) and AKR10H0AH (DOT).

The project, at Ted Stevens Anchorage International Airport (TSAIA), will improve Taxiways Z, E, and R, modify existing indicated taxi lane approaches, and relocate an existing service road. Work includes excavation, embankment, drainage, paving, lighting, signage, utility relocation, FAA NAVAID adjustments, and containment of known and/or suspected per- and polyfluoroalkyl substances (PFAS) contaminated soils.

The project area receives approximately 15.97 inches of total precipitation annually and anticipates spring thaw around May 16 and fall freeze around September 30. Storm water discharges from the project area travel through the TSAIA storm water conveyances and ultimately discharge to Cook Inlet, Lake Hood/Spennard, and/or wetland. These water bodies are not listed as impaired under the Clean Water Act section 303(d).

This is the first inspection of this project by the Department of Environmental Conservation (DEC). The inspection covers the period from initial authorization through the date of the inspection, 6/16/2023 through 6/19/2024.

The compliance monitoring review and a review of Environmental Compliance History Online (ECHO) and Integrated Compliance Information System (ICIS) has shown that this facility is not in significant noncompliance for the period of this evaluation.

Field Inspection

Upon arrival at the project office, introductions were exchanged, and inspector credentials were presented. The inspection included an examination of the relevant areas of the site pertaining to the discharge and a review of records made available onsite or received/submitted electronically.

The following information was provided verbally by onsite representatives:

- Construction began on 6/19/2023 and is estimated to be complete 9/1/2025.
- Taxiway E intersection and Runway 7R are under construction; the current phases of the project are 5A/5B, 7 and 9.
- The project expects to disturb a total of 164.5 acres. Total acreage expected to be disturbed has not changed since the notice of intent was filed.
- Current sediment and erosion controls installed include compost socks, wattles, storm drain filter inserts ("witches' hats"), permanent articulated concrete turf reinforcement mats (TRM), silt fence, hydro mulch, and bonded fiber matrix (BFM) seed.
- Jordan Ortega, the SWPPP manager employed by QAP, is an Alaska Certified Erosion and Sediment Control Lead (AK-CESCL, # ASA-22-0043 expiring 4/14/2025.)
- Mr. Ortega is responsible for the maintenance of best management practices, including sediment and erosion control measures, on the site.
- Inspections are conducted by Noah Wright of EMC Engineering, and Mr. Ortega, every seven days.
- Mr. Wright is an AK-CESCL (# AGC-24-0144 expiring 3/27/2027.)
- Utility work was conducted throughout the winter, and inspections were conducted monthly from November 7, 2023, through April 9, 2024.

- Ray Butcher, Superintendent for QAP and Jim Rossi, Project Engineer with EMC Engineering both sign and certify inspection reports.
- Rolled erosion control product (RECP) turf was installed and hydro mulching and BFM seeding was completed to stabilize the site before frozen conditions began and inspection frequency was reduced.
- Stockpiles currently on site include a stockpile of topsoil, protected with mulch and wattles around the perimeter; a stockpile of riprap, which is inherently stable; and stockpiled soils that are potentially contaminated with PFAS, which are lined and covered in containment areas.
- Shoreside Petroleum delivers fuel to equipment in place. Duck ponds are used to contain any spills during fueling and spill kits are available in equipment staging areas and in the office.
- No vehicle washing is conducted.
- Equipment that operates in PFAS contamination areas is brushed clean before leaving those areas.
- There are currently two concrete washouts on site. The project uses small, portable, temporary washouts and these are added, moved, and removed as needed.
- A dumpster with a screen cover contains construction debris and other nonhazardous solid waste generated at the project site.
- Oil, gas and other hazardous materials are stored in a shipping container or box van and are not exposed to storm water.
- A truck services equipment at the end of each workday.
- Vehicle tracking pad “rumble mats” at site entries are cleared daily and replaced as needed.

Turbid Water Near Soil Disposal Area (Fill Site)

- A depression near the fill site where excavated, uncontaminated soils are being disposed has filled with turbid water. This depression is bordered by vegetated buffer and silt fence perimeter control separates this area from disturbed areas of the site.
- The brush and trees bordering the waterfilled depression were standing upright, with no evidence of sediment on their leaves. If the vegetative buffer had been overwhelmed to allow sediment to migrate into the depression, the brush and trees would be expected to have retained some sediment.
- The silt fence appeared to be installed with appropriate tension and appeared to be well-maintained.
- Unvegetated area around the waterfilled depression was moderately sloped, stabilized with an opaque layer of hydro mulch, and showed no evidence of rilling or gullying.
- The waterfilled depression is at a relative low point. It did not appear to the inspector that it could discharge to adjacent areas in normal conditions.
- Representatives explained that they do not believe this water collected by means of surface runoff but may have been displaced groundwater resulting from the additional weight and mass of soils added to the adjacent fill site.
- Representatives stated that they contacted Shane Serrano, an Enforcement Officer in the Department, Division of Water, Compliance and Enforcement Program when this turbid water was first observed, on September 8, 2023, to report the observation.
- Mr. Serrano did not specifically remember the conversation when asked about it on 7/9/2024 but did not deny that a conversation had occurred.
- The depression is marked on the site map as a potential wetland. Notes in site maps include that wetland areas should be verified in the field.
- A jurisdictional determination with project ID POA-2022-00136, found at [CWA Approved JDs \(epa.gov\)](https://www.epa.gov/cwa-approved-jds), notes that a wetland near the project fill site, with the description “Organic soil flats have precipitation as the water source, and its dominant hydrodynamic is vertical”, is “Isolated (interstate or intrastate) waters” and not a water of the United States. The location associated (61.16304 N,

150.00269 W) is a quarter of a mile from the coordinates associated with Photo 40, of the waterfilled depression (61.1651208 N, 150.009163 W).

- Little Campbell Lake is approximately half a mile from the waterfilled depression and approximately 0.7 miles from the jurisdictional determination.

The following observations were made onsite or within required documents by DEC inspectors:

- Weather conditions during the inspection were overcast, 50 F with light wind.
- The site in general appeared in good condition. Good housekeeping was evident.
- Construction activities were ongoing during the inspection. A water truck was spraying for dust mitigation, workers were laying asphalt and heavy equipment was operating.
- Stockpiles were observed to be in active use.
- Many disturbed areas where stabilization had not yet been initiated were actively being disturbed.
- Stabilization had begun in several areas that had recently reached final grade.
- No evidence of sedimentation or erosion was visible around the taxiway E intersection area that was actively being worked.
- Excavation was ongoing to repair a broken water line.
- Excavation to create a “stub” of what will be Taxiway Z to create additional space to allow jets to turn has begun.
- Several pieces of heavy equipment were stationary. No oil stains or other signs of leaks were observed beneath them.
- Portable toilets are strapped down and in secondary containment.
- Documents are well-organized in a binder and kept up to date. Amendments are clearly noted and include effective date and the initials of the individual making the amendment.

Sampling

YES



NO



No sampling was conducted as a component of this inspection.

Records Review

The following records were reviewed as part of the on-site inspection and are considered complete:

- A copy of the Construction General Permit effective 2021
- The project’s Storm Water Pollution Prevention Plan dated June 2023 as amended last 5/7/2024, which identifies the permittees, storm water contacts, project site-specific conditions, the nature of construction activities and control measures in use or intended to be used in the future.
- Certification of the SWPPP by both responsible parties; DOT signed by James Rasi on 6/15/2023, and QAP signed by Ray Butcher on 5/31/2023.
- A delegation of signatory authority to the project engineer signed by John Binder, Regional Director for DOT.
- A delegation of signatory authority to the project superintendent signed by Todd Porter, General Manager of QAP.
- Subcontractor certification forms.
- Copies of both parties’ NOIs and authorization letters associated with the project, including three modifications to the DOT authorization.
- Documentation of the SWPPP Preparer’s site visit on 6/13/2023, signed by Elaine Pflugh of ELP Engineering.

- SWPPP Amendment log with 57 entries, each citing pages, dates and including the signature of the individual authorizing the amendment.
- Detailed project schedule.
- Project staff tracking form documenting staffing changes and AK-CESCL numbers of qualified personnel.
- Daily rainfall monitoring log with entries dating back to project beginning.
- Detailed specifications for installation of BMPs and storm water controls in use.
- Hazardous Materials Control Plan for the project, prepared by Elaine Pflugh, P.E. dated May 2023, outlining types of hazardous materials the project will handle, measures for control, and spill response.
- SWPPP Training logs dated 6/22/2023, 7/7/2023, 8/3/2023, 8/31/2023, 9/11/2023, 10/9/2023, 11/2/2023, 12/1/2023, 12/29/2023, 1/26/2024, 2/23/2024, 3/20/2024, 4/24/2024, 5/7/2024, and 6/6/2024 documenting trainings covering a range of topics including but not limited to storage, BMP installation, specific use cases for specific BMPs, and CGP permit sections.
- SWPPP Corrective Action Log including 66 entries, ordered chronologically, including the date the need for corrective action was identified, whether identified during a regular inspection, description of the conditions requiring corrective action and the specific location, the complete-by date, the date completed, and the name of the individual documenting that corrective action had been completed.
 - Corrective actions were documented complete before the identified complete-by date in every instance.
 - The only as-yet incomplete corrective actions at the time of the inspection had been identified the prior day (6/18/2024.)
 - Descriptions of corrective actions were clear and precise.
- A collection of site maps in the SWPPP identify the project area, extents of disturbance, locations of installed temporary and permanent sediment and erosion controls, storm water conveyances, material staging areas, areas where grading and stabilization had been initiated and completed, drainage directions, north arrows, bar scales, and dates of modifications including addition of and removal of control measures and pollutant sources.
- A randomly selected inspection report including 155 specific control measures and BMP installations and 26 discharge point locations.
- AK-CESCL cards for Benjamin Button #ASA-22-0068, Ray Butcher #ASA-21-0145, James Rasi #AGC-23-0023, Marie Hartshorn #ALT-21-0021, Jay Audette-Smith #AGC-22-0154,
- Correspondence dated 5/5/2024 submitting the ADEC Storm Water Engineering Plan Review forms for the new nondomestic wastewater systems for collection and discharge of storm water runoff associated with the project, and a response from Sam Kito, ADEC Engineer granting approval 5/16/2022.

Closing Conference

The following participants were present during the closing conference:

- Jim Rasi, EMC Engineering/ Alaska DOT&PF
- Tyler Rickabaugh, QAP
- Ben Button, QAP
- Ray Butcher, QAP Superintendent
- Jordan Ortega, QAP SWPPP Manager
- Noah Wright, EMC Engineering SWPPP Manager

- Joshua James, Alaska DOT&PF

Upon completion of inspection at Ted Stevens Anchorage International Airport, a closing conference was held. The DEC inspector provided the facility with preliminary inspection findings and discussed follow-up procedures.

Section 4: Compliance

Violations

No violations were identified as a result of this inspection.

Areas of Concern

- The definition of ‘waters of the United States’ specifically excludes “waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States.”
- Because of this exclusion and because of the 2022 jurisdictional determination regarding a location nearby, the inspector believes that the waterfilled depression on this site is likely not a water of the United States and did not identify any violations associated with impact to the water quality of the waterfilled depression on this site as a result. However, this inspector does not have the authority or the training to determine whether wetlands are waters of the United States.

Section 5: Appendixes

1. Photo Addendum

Signature

Inspector – Rachel Newell
Credential Number: R-0625
Phone: (907) 269-7624
E-mail: rachel.newell@alaska.gov



Date: 7/15/2024

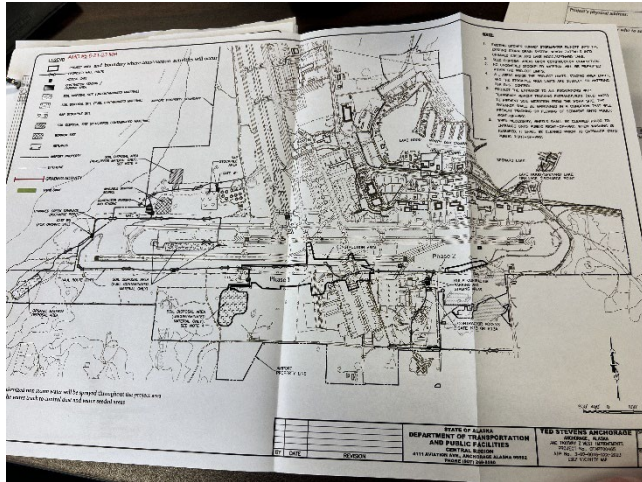
Reviewed By – Nicole Warner
Credential Number: 327864
Phone: (907) 269-3094
E-mail: nicole.warner@alaska.gov



Date: 7/17/2024

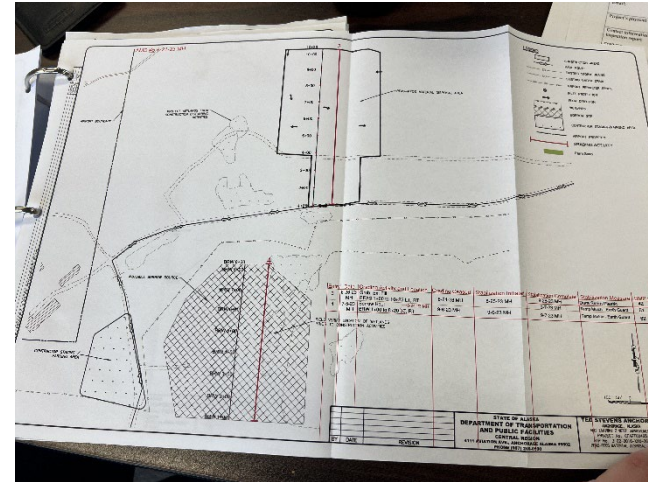
Photo Addendum

Photo 01



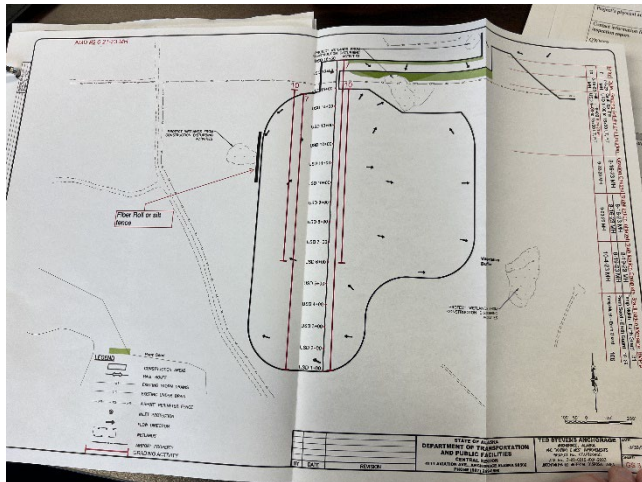
Site map – overview of project areas on the airport

Photo 02



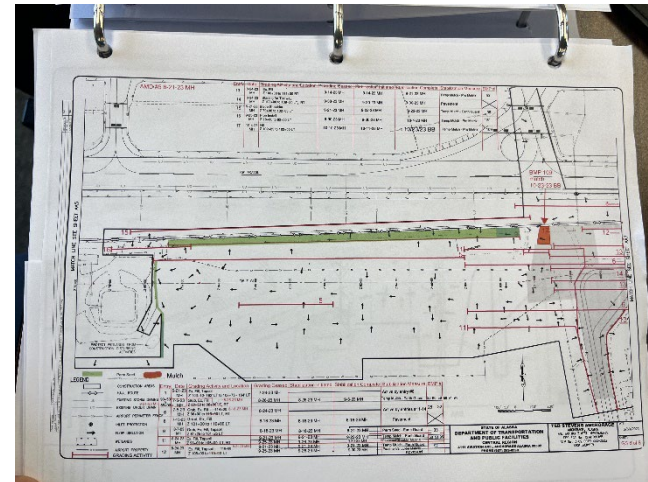
Site map – borrow site and PFAS-PFOS material disposal area with applicable grading and stabilization log entries

Photo 03



Site map – fill site with drainage arrows and

Photo 04



Site map – area near intersection of Taxiway E, including grading and stabilization log entries applicable to the area

Photo Addendum

Photo 05

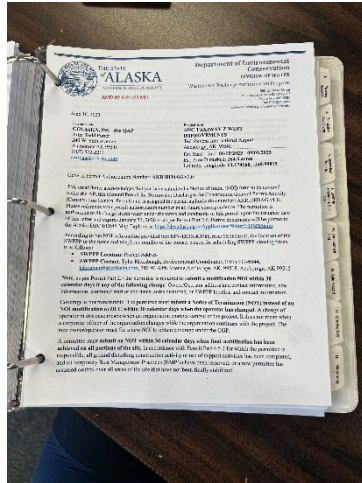


Photo 06

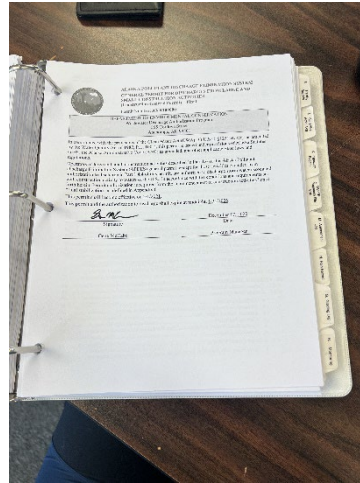
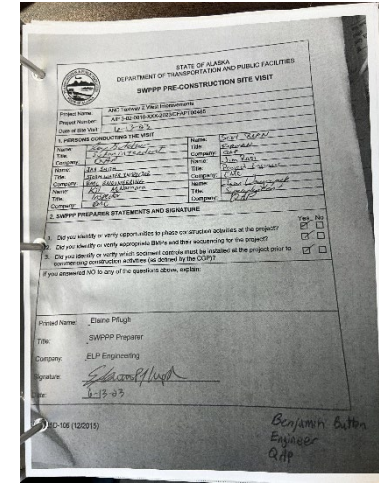


Photo 07



6/16/2023 AKR10H0AG v1.0 authorization letter

Copy of the Construction General Permit

Site visit by SWPPP Preparer on 6/13/2023

Photo 08

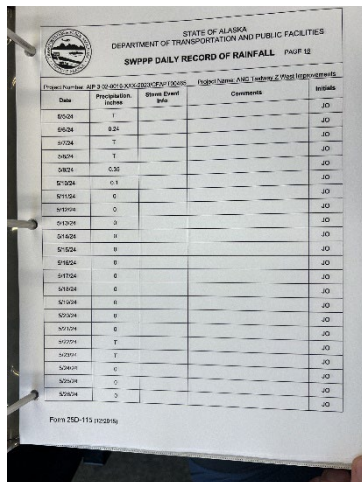


Photo 09

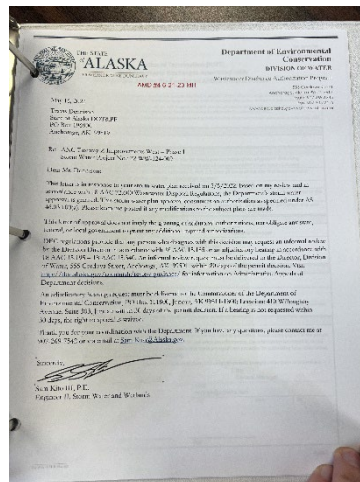
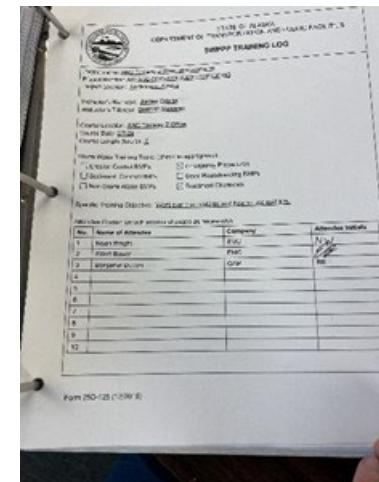


Photo 10



Daily rainfall log

Approval of storm water plan 5/16/2022

Training log dated 5/7/2024 re: spill kit use

Photo Addendum

Photo 05

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
SWPPP CORRECTIVE ACTION LOG PAGE 6

Project Number: AP 3-02-0016-XXX-2023CFAP00466 Project Name: ANC Taxiway Z West Improvements

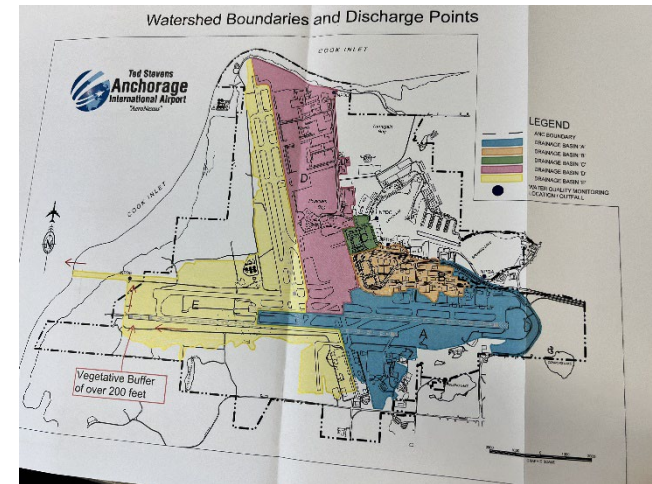
Use this form to track completion of all corrective actions. Note that corrective actions can be identified during and outside of inspections. Detailed instructions for completing this form can be found on the Alaska Construction Forms website: http://dot.alaska.gov/awd/awdforms/cons_forms.shtml

Corrective Action Number	Date Identified (check box if outside inspection)	Description of corrective action, including the following as applicable: • What? Where? How? When? • How? If a 24-hr. storm event occurred (see instructions) • All corrective actions require a complete log date and description. • Start in the top left corner and work down the page.	Complete By Date	Date Complete	Name of Person Documenting Completion
56	5/21/24	BMP 139 STA 110+00 LT. Storm event occurred (see instructions). BMP 139 STA 110+00 LT. Storm event occurred (see instructions). BMP 139 STA 110+00 LT. Storm event occurred (see instructions).	5/27/24	5/27/24	Jordan Ortega
57	5/21/24	Compost sock inlet protection needed on inlet at STA 123+25 LT.	5/27/24	5/27/24	Jordan Ortega
58	5/28/24	BMP 150 STA 123+00 LT. Compost sock was dislodged and needs to be replaced.	6/3/24	5/29/24	Jordan Ortega
59	5/28/24	BMP 141 STA 123+00 LT. Storm event occurred (see instructions). BMP 141 STA 123+00 LT. Storm event occurred (see instructions).	6/3/24	5/29/24	Jordan Ortega
60	6/4/24	BMP 130 STA 123+00 LT. Compost sock was covered in dirt, needs to be cleaned and shrouded out.	6/10/24	6/5/24	Jordan Ortega
61	6/4/24	BMP 139 STA 110+00 LT. Waste was run over and torn out of place. Needs to be replaced and replaced.	6/10/24	6/5/24	Jordan Ortega
62	6/11/24	BMP 118 STA 124+50 RT. Compost sock inlet protection out of place. Needs to be adjusted and inlet cleaned.	6/17/24	6/12/24	Jordan Ortega
63	6/11/24	BMP 78 STA 81+75 RT. Silt fence came unstapled and needs to be re-stapled.	6/17/24	6/12/24	Jordan Ortega
64	6/18/24	BMP 113 STA 81+50 RT. Silt fence came unstapled and needs to be re-stapled.	6/24/24	6/24/24	Jordan Ortega
65	6/18/24	BMP 141 STA 124+50 RT. Silt fence came unstapled and needs to be re-stapled.	6/24/24	6/24/24	Jordan Ortega
66	6/18/24	BMP 126 STA 111+90 RT. Compost sock buried and needs to be cleaned and put back into place.	6/24/24	6/24/24	Jordan Ortega

Form 250-112 (12/2015)

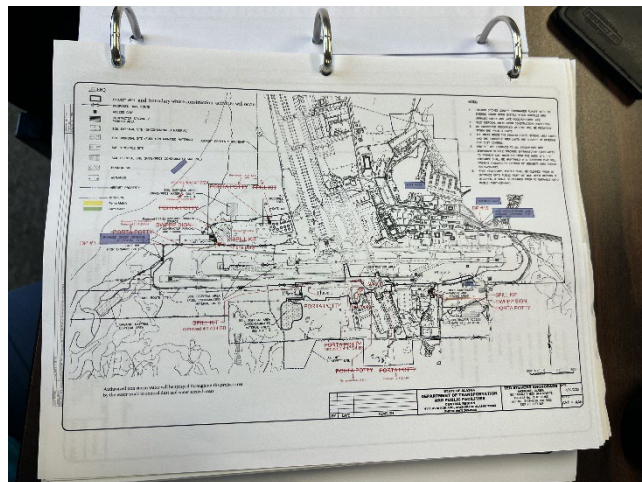
SWPPP corrective action log entries 56-66 dated 5/21/24 – 6/18/24

Photo 06



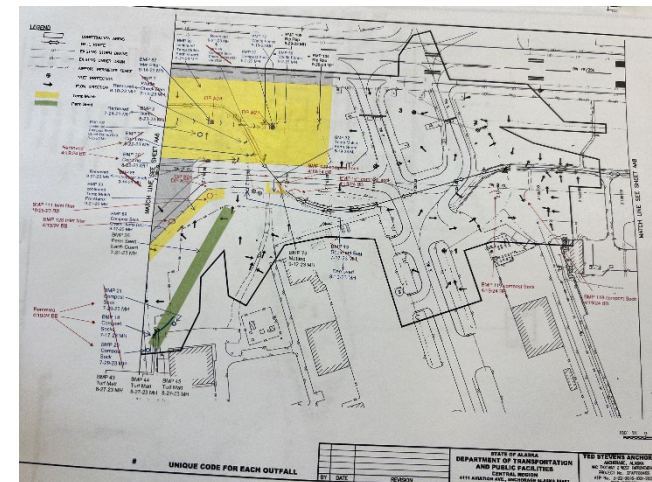
Drainage areas and discharge points

Photo 07



Site Map of entire airport area, discharge locations, waters of the US, BMPs

Photo 08



Site Map of taxiway E area including BMPs, discharge points, stabilization

Photo Addendum

Photo 09



Material storage area

Photo 10



Spill kits in material storage area

Photo 11



Pumps and shipping container for dry storage

Photo 12



Material storage area

Photo Addendum	
Photo 13	Photo 14
	
Dumpster with chain link cover	Construction activity in disturbed area near Echo intersection
Photo 15	Photo 16
	
Groundcloth installed over finer soils to maintain separation from clean gravel at Echo intersection	New asphalt laid over gravel layer at Echo intersection



Photo Addendum	
Photo 17	Photo 18
	
Concrete washouts	Concrete washout detail
Photo 19	Photo 20
	
Topsoil stockpile in active use	Water truck spraying for dust mitigation





Photo Addendum	
Photo 21	Photo 22
	
Gravel stockpile	Debris from old centerline stockpiled until it can be hauled away
Photo 23	Photo 24
	
Excavation to repair a water line break began on Sunday 6/16	Excavating to extend taxiway Zulu to the East

Photo Addendum	
Photo 25	Photo 26
	
Portable sanitary facility near a spill kit, in secondary containment, and anchored	Asphalt work
Photo 27	Photo 28
	
Articulated concrete TRM installation – will be seeded over	Grading for future vegetated swale and track-walking, ready to seed




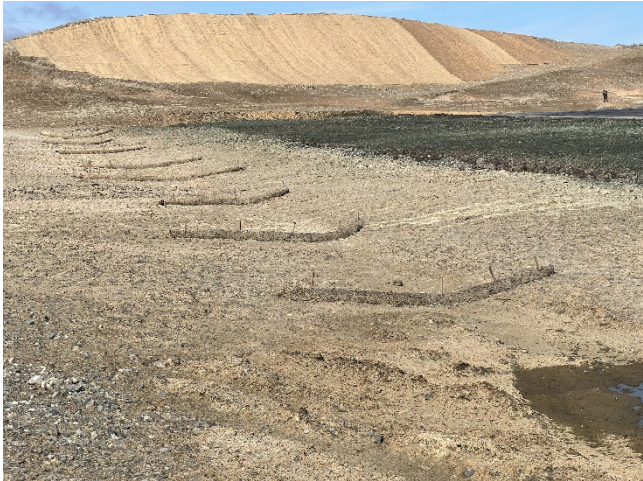
Photo Addendum	
Photo 29	Photo 30
	
Slope stabilized with coconut mat RECP – will be excavated eventually	Articulated concrete TRM installation in drainage path of vegetated swale
Photo 31	Photo 32
	
Trenching in swale that was hydroseeded 6/18/2024	Wattles as check dams in hydro mulched drainage area not yet at final grade





Photo Addendum	
Photo 33	Photo 34
	
Manhole protected with filter fabric	Articulated concrete TRM in storage
Photo 35	Photo 36
	
Trackwalking and hydroseed along access road to fill site	Fill site for uncontaminated soils





Photo Addendum	
Photo 37	Photo 38
	
Uncontaminated soil fill	Trees separate this project's fill site from adjacent project
Photo 39	Photo 40
	
Some sediment migrated to low areas of the fill site, but did not appear to have discharged	Turbid water near fill site, as seen from access road





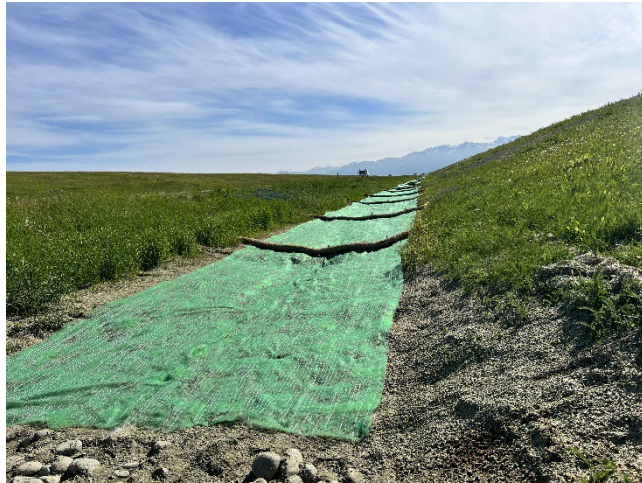
Photo Addendum	
Photo 41	Photo 42
	
Stormwater flow control will be below final grade	Interior of flow control
Photo 43	Photo 44
	
Looking upgradient of flow control	Upgradient of flow control

Photo Addendum

Photo 45



Geotextile lining swale that will vegetate

Photo 46



Culvert downstream of entire project area, where SWPPP team visually monitors discharge

Photo 47







Downgradient of culvert

Photo 48



Temporary PFAS cell

Photo Addendum	
Photo 49	Photo 50
	
Long-term PFAS cell	Long-term PFAS cell
Photo 51	Photo 52
	
Long-term PFAS cell	Long-term PFAS cell



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Environmental
Conservation

DIVISION of Water
Anchorage

555 Cordova Street
Anchorage, AK 99501
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www.dec.alaska.gov

4/5/2024

Jonathan Tague, P.E.
ADOT&PF
PO Box 196900
Anchorage, AK 99519

SUBJECT: APDES Inspection of Anchorage Area Drainage Improvements- McHugh Creek,
Authorization Numbers AKR10H03Q and AKR10H03M.

Dear Mr. Tague:

Per the Alaska Pollutant Discharge Elimination System (APDES) program, an inspection of Anchorage Area Drainage Improvements -McHugh Creek was conducted on March 8, 2024. We would like to provide you with a copy of the inspection report for your records. Thank you for your cooperation and assistance regarding this inspection and for your efforts in protecting human health and the environment.

Sincerely,

Karolina Pavic, Environmental Program Specialist

Credential No. R-0518

Check One:

- ☐ Personally Served
☐ Sent by Certified Mail
☒ Sent via e-mail
on the 5th day of April 2024

Enclosure: Inspection Report

cc:

DEC.Water.APDESData@alaska.gov

Jon Wendel, DEC

Natasha Knight, DEC

Rick Cool, EPA



APDES INSPECTION REPORT

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

Section 1: General Data

Authorization Number	Announced / Unannounced	Receiving Waters	Inspection Date
Numbers: AKR10H03Q AKR10H03M	Announced	Cook Inlet via McHugh Creek	Date: 3/8/2024
Effective: 11/17/2023 Effective: 6/15/2023			Entry Time: 10:00AM
Expiration: 1/31/2026			Exit Time: 2:00PM

Section 2: Facility Data

Name of Facility: Anchorage Area Drainage Improvements- McHugh Creek

Responsible Party/Mailing Address

Name: Scott Dunlap
Title: Vice President, Rodger Hickel Contracting, Inc
Address: 11001 Calaska Circle, Anchorage, AK 99515
Phone: (907) 336-4112
Email: contract@rhcak.com

On-Site Representative/Physical Address:

Name: Brad Hall
Title: SWPPP Manager, Roger Hickel Contracting, Inc
Address: 11001 Calaska Circle, Anchorage, AK 99515
Phone: (907) 570-1900
Email: contract@rhcak.com

Responsible Party/Mailing Address:

Name: Sean Holland
Title: Regional Director, Alaska Department of Transportation and Public Facilities (ADOT&PF)
Address: PO Box 196900, Anchorage, AK 99519
Phone: (907) 269-0770
Email: sean.holland@alaska.gov

On-Site Representative/Physical Address:

Name: Jonathan Tague
Title: Project Engineer, ADOT&PF
Address: PO Box 196900, Anchorage, AK 99519
Phone: (907) 267-2706
Email: jonathan.tague@alaska.gov

Additional Inspection Participants:

Joshua James, ADOT&PF, Engineer/Project Manager
Athena Marinkovic, Engineering Assistant/AK-CESCL Advisor, ADOT&PF

For internal use only:

Off-Site Compliance Evaluation: ☐ Yes ☒ No
NAICS: 237310 Highway, Street and Bridge Construction

Section 3: Findings

Background/Regulatory Status/Compliance History

The Anchorage Area Drainage Improvements project is authorized by the Alaska Department of Environmental Conservation (DEC) to discharge storm water associated with construction activities per the Alaska Pollutant Discharge Elimination System (APDES) Construction General Permit (CGP), AKR100000, under authorization numbers AKR10H03Q and AKR10H03M. The project is a joint venture by the Alaska Department of

Transportation and Public Facilities (ADOT&PF) and Roger Hickel Contracting, Inc (RHC). The project aim is to improve drainage along a portion of the Seward Highway through existing culvert replacement at Mile Post (MP) 112 of the Seward Highway. The receiving waterbody for the project has been identified as the marine water of Cook Inlet, located within the Turnagain Arm waterway of the Gulf of Alaska. Cook Inlet is not considered an impaired water under the Clean Water Act, Section 303. McHugh Creek (AWC 247-60-10300) is listed in the Alaska Department of Fish and Game (ADF&G) Catalog of Waters Important for Spawning, Rearing or Migration of Anadromous Fishes (AWC) based on the utilization, presence or rearing of coho salmon (*Oncorhynchus kisutch*). An area map of the project is shown in Figure 1.

The purpose of this routine inspection conducted on March 8th, 2024, was to determine facility compliance with the CGP. The authorizations first became effective on September 7th and 8th, 2022, respectively. The last modifications were submitted to DEC and became effective on November 17th, 2023, and June 15th, 2023. The authorizations will expire on January 31st, 2026. This is the first inspection of the project by DEC and covers a period starting September 7th, 2022, the date of first authorization to the date of inspection, March 8th, 2024.

The compliance monitoring review and a review of Environmental Compliance History Online (ECHO) and Integrated Compliance Information System (ICIS) has shown that these authorizations are not in significant noncompliance for the period of this evaluation.

Field Inspection

Upon arrival to the project site, introductions were exchanged and inspector credentials were presented. The inspection began with a records review and interview session at the AKDOT&PF office in Anchorage followed by a project site walk-through at McHugh Creek Day Use Parking Lot. Prior to the inspection, a thorough review of the Storm Water Pollution Prevention Plan (SWPPP) was conducted by DEC Compliance Program personnel.

The following information was provided verbally by onsite representatives or obtained through a review of records:

- The project does not discharge to any piped drains belonging to a Municipal Separate Storm Sewer System (MS4) but is located within the Municipality of Anchorage (MS4 Permit No. AKS052558). The project is located at MP 112 of the Seward Highway which is approximately 16 miles south of the City of Anchorage.
- Stormwater discharges from the project site percolate through vegetation or the ground and discharge to Cook Inlet. Culvert replacement and installation will be a permanent stormwater control measure at the site.
- Cook Inlet, the receiving waterbody, is an Essential Fish Habitat and designated as critical habitat for the endangered Cook Inlet Beluga. The areas are managed by the National Oceanic and Atmospheric Administration (NOAA). The project zone is not expected to impact those areas and visual monitoring for Belugas was not required. Noise monitoring was conducted to ensure that drilling noises did not exceed 120 decibels during Beluga presence.
- The project received a modified Fish Habitat Permit (FH22-11-0028) on February 3, 2023, with expiration date of June 15, 2025, to conduct culvert replacement work within McHugh Creek.
- The project zones do not intersect Public Drinking Water Areas and are not within 1,500 feet of any contaminated sites.
- The project began in September of 2022. The estimated completion date for the project is middle of July 2024. The pre-Storm Water Pollution Prevention Plan (SWPPP) inspection took place on August 19th, 2022, and at start of construction on September 12th, 2022.
- RHC has control of the day to day operation at the project site while ADOT&PF has planning and funding duties.

- The main purpose of the project is replacement of a failed cross culvert which was installed approximately 50 years ago. The project will install a 72" steel culvert with 1" fiberglass liner, will be compliant with the Alaska Department of Fish and Game (ADF&G) Fish Passage Act, and will provide an additional spawning opportunity for salmon that was not present prior to the project.
- ADOT&PF and RHC representatives stated that spills have not occurred at the site since the project started.
- The total project area is 5 acres of which 4.2 acres are disturbed.
- The work schedule is 5 days a week with both night and day shifts.
- Non-working days have shifted according to weather and major holiday travel on the Seward Highway for safety reasons as the two-lane highway is the only means of vehicle travel connecting the southern Kenai Peninsula to the rest of the state highway system.
- Project staff reported only minor disruptions to schedule due to COVID-19 and supply chain shortages.
- Due to location of the project site and nature of activities requiring drilling and flagging, weather delays for crew safety were cited. The project is still expected to finish with only a minor extension period.
- Winter shutdown occurred on January 4th, 2024, and equipment was removed from the staging area the week of December 18th, 2023.
- Duck ponds and spill kit Best Management Practices (BMP's) were removed for winter shut down due to high-wind potential. Project delineation flagging, SWPPP signage, safety cones, barricades and traffic control devices were left in place. The slope was stabilized with bonded fiber matrix (BFM) prior to winter shut down.
- Stockpiles were used up prior to winter shut down; therefore, no stabilization or covering was required.
- Both RHC and AKDOT&PF monitor BMPs throughout the site.
- Rainfall monitoring data is collected from the Anchorage International Airport weather station.
- SWPPP inspections are done by Brad Hall (RHC) and Trent White (AKDOT&PF) once a week. A SWPPP inspection was not performed on the day of DEC inspection as the project was still in winter shut down.
- SWPPP inspection records are stored digitally after review and signature requirements are met; hard copy records are stored by AKDOT&PF. Inspection reports are signed by the Project Superintendent, Adam Erdmann, and Project Engineer, Jonathan Tague.
- Even though the project is still in winter shut down, a small pothole is scheduled to be repaired on March 12th, 2024, pending favorable weather conditions.
- Training is conducted as required for RHC staff, and on a regular basis for AKDOT&PF staff.
- Concrete wash-out waste was deposited in a lined truck bed and taken away by the contractor, AS&G Concrete.
- Excavation and Dewatering took place at the site and an additional permit was not required.
- Fueling of equipment is conducted on site by Shoreside fuel trucks which are equipped with spill kits. Additional spill kits are staged at the project site.
- Equipment washing or maintenance is not conducted on site.
- Construction debris and garbage was deposited in a dumpster located on site which had been emptied twice since the project began. Most of the trash from the site was taken to Anchorage for disposal, while plastic and metal debris was placed in the dumpster.
- The staging area is located in the paved McHugh Day Use parking lot which has a designated entry and exit point.
- Staff affiliated with project oversight have received AK-CESCL training and have anywhere from 10

to 15 years of construction experience.

The following observations were made by DEC inspectors:

- BMPs observed on site included: use of existing vegetative buffers, stabilized entrance/exit for staging area, road safety barriers, flagging, fiber rolls, BFM, covered waste disposal area and construction material storage.
- Although the primary visual inspection of the project site took place on March 8th, 2024, the construction area was observed twice daily and several times a week from the start of the project in Fall 2022, as well as during Summer and Fall of 2023. The project will also be continuously observed as the area is within DEC inspectors' office and home commute. Observations prior to the date of inspection have not yielded any areas of concern.
- Night drilling work was frequently observed prior to winter shut down in Fall of 2023 without any concerns noted.
- Flagging and traffic control, as well as construction activities, were observed by the inspector during both night and day shift work.
- The project site is concentrated on both the southbound and northbound lanes of the Seward Highway between mile posts 111 and 112.
- Construction equipment, one staff trailer, and a Connex were staged at a pre-existing pull-out at McHugh Day Use parking lot, which is maintained by Alaska State Parks as part of Chugach State Park. The parking lot remained open for use during winter shut down.
- The staging area employed temporary BMP's including BFM and fiber rolls, flagging and traffic safety marking.
- No evidence of spills or equipment leaks were observed in the staging area at the time of inspection.
- An empty storage tank intended for washout waste was staged in the parking lot.
- SWPPP signs were observed at the project site.
- The construction site had a designated and well-marked entrance/exit with highway signs, safety barriers and traffic control flagging.
- The construction area had minimal debris which was scheduled for clean up as soon as winter shut down ends (mid-April).
- Materials without discharge potential, such as metal pilings, were stored in the staging areas, while spillable materials were stored inside the Connex.
- Duck ponds were not observed under staged equipment at the site due to high winds; the staged equipment was free of fluids.
- Snow melt discharge was observed in the project zone and was appropriately managed; erosion was not observed.
- Copies of SWPPP inspections, modifications and permit required records were well maintained and reviewed off site at the AKDOT&PF office prior to the visual inspection.

Sampling	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
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No samples were taken during this inspection.

Records Review

The following records were reviewed as part of the on-site inspection and are considered complete:

- A copy of Construction General Permit
- A copy of the SWPPP with Maps
- Copies of the NOI and DEC Authorization Letter's for AKR10H03M and AKR10H03Q
- SWPPP Certifications
- Copy of Delegation Forms

- SWPPP Amendment Logs 2022 through 2024 – Last entry date January 5th, 2024
- SWPPP Corrective Action Logs 2022 through 2023 – Last entry date October 31st, 2023
- SWPPP Grading and Stabilization Logs 2022 through 2023 – Last entry date December 21st, 2023
- Certified Erosion and Sediment Control Lead (CESCL) Certifications
- SWPPP Daily Record of Rainfall Logs– Last entry date January 4th, 2024
- Copies of Inspection Reports 2022 through 2024– Last entry January 4th, 2024 (last inspection)
- SWPPP Training Logs 2022 through 2024 –Last entry date March 3rd, 2024
- Monthly Spill Logs, no entries as spills have not occurred

Closing Conference

The following participants were present during the closing conference:

- Karolina Pavic, DEC
- Jonathan Tague, ADOT&PF
- Joshua James, ADOT&PF
- Athena Marinkovic, ADOT&PF
- Brad Hall, Roger Hickel Contracting, Inc.

Upon completion of inspection at Anchorage Area Drainage Improvements McHugh Creek, a closing conference was held. The DEC inspector provided the facility with preliminary inspection findings and found the project site in good condition with BMP's functioning as intended.

Section 4: Compliance

Violations

Violations were not identified during this inspection.

Areas of Concern

None

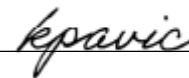
Section 5: Appendixes

1. Photo Addendum
2. Close Out Letter

Signature

Inspector – Karolina Pavic
 Credential Number: R-0518
 Phone: (907)269-6281
 E-mail: karolina.pavic@alaska.gov

Reviewed By – Elizabeth Stergiou
 Credential Number: R-0554
 Phone: (907) 269-6287
 E-mail: elizabeth.stergiou@alaska.gov



Date: 4/2/2024



Date: 4/3/2024

Figure 1:

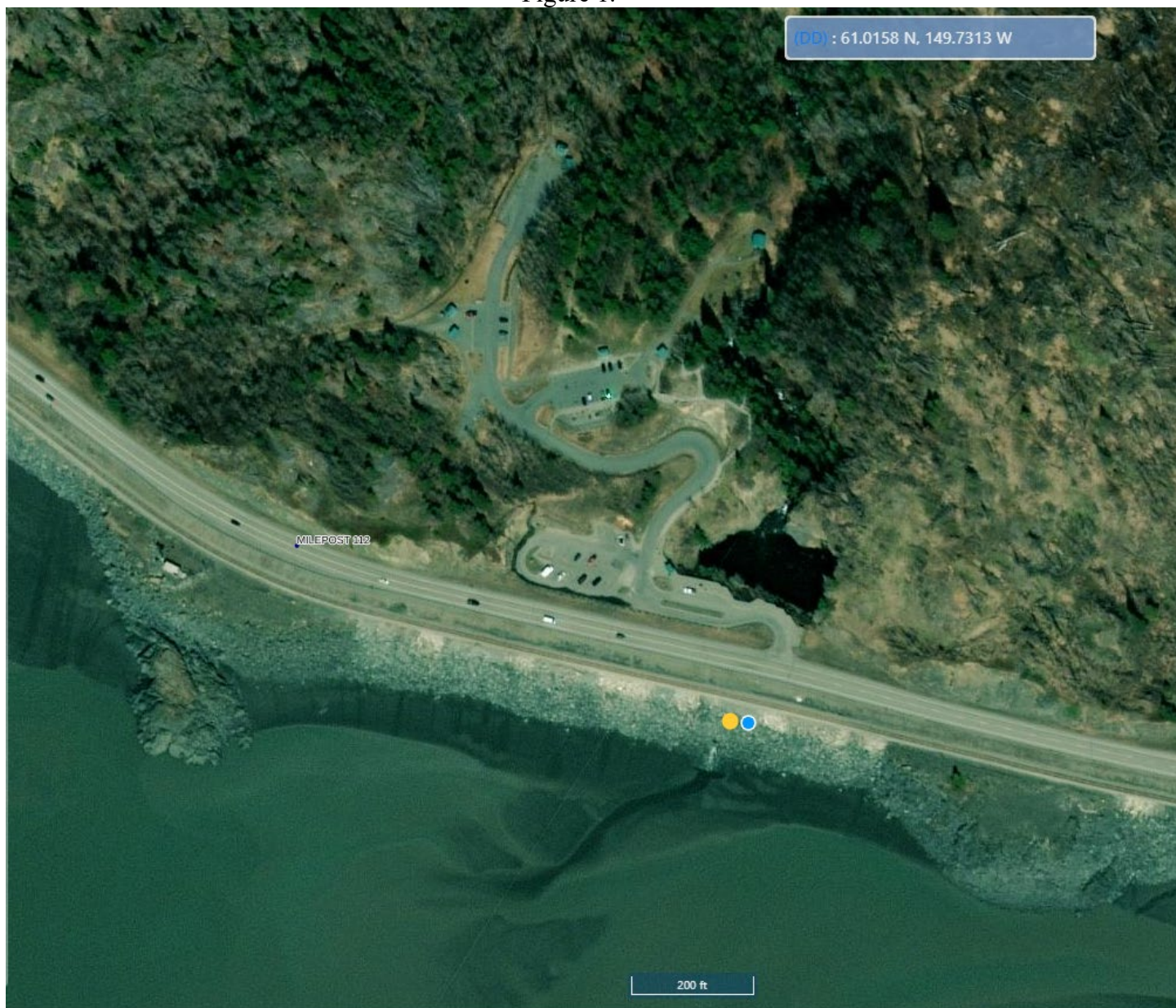


Photo Addendum	
Photo 01	Photo 02
	
Construction Entrance/Exit Looking North	McHugh Creek State Park Day Use Parking Lot
Photo 03	Photo 04
	
Fiber Roll BMP (Looking South)	Project Flagging/Delineation BMP (Looking South)
Photo 05	Photo 06
	
Bonded Fiber Matrix (BFM) BMP	Fiber Roll BMP (center) (Looking North)







Photo Addendum	
Photo 07	Photo 08
	
Project Traffic Control (Looking North)	Project Traffic Control (Looking South)
Photo 09	Photo 10
	
Construction Staging Area	Employee Trailer and Construction Equipment
Photo 11	Photo 12
	
Empty Storage Tank	Excavator and Sandbags







Photo Addendum	
Photo 13	Photo 14
	
Staging Area	Culvert Location
Photo 15	Photo 16
	
Pond by Culvert	SWPPP Sign
Photo 17	Photo 18
	
Staging Area	Connex in Staging Area



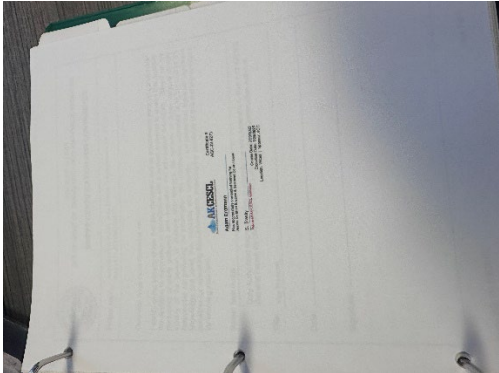
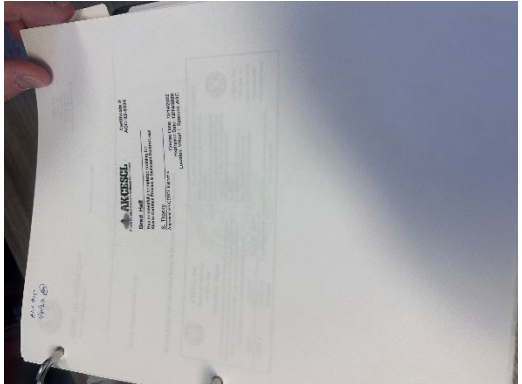
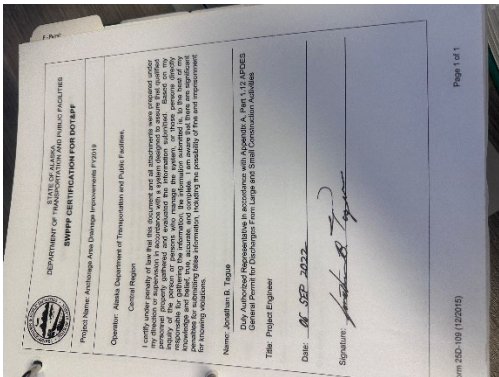
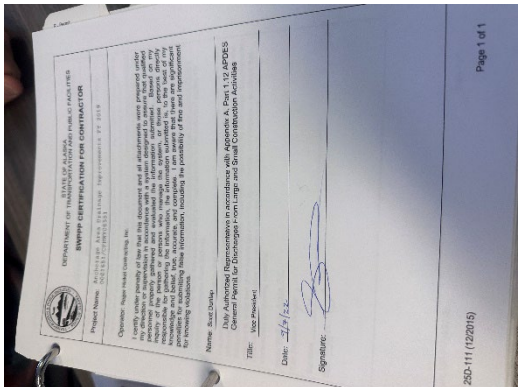
Photo Addendum	
Photo 19	Photo 20
	
Parking Lot/Staging Area (Looking North)	Debris
Photo 21	Photo 22
	
AK-CESCL Certification Adam Erdmann	AK-CESCL Certification Brad Hall
Photo 23	Photo 24
	
SWPPP Certification AKDOT&PF	SWPPP Certification RHC

Photo Addendum

Photo 25

Form 250-112 (12/2015)

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
SWPPP PRE-CONSTRUCTION INSPECTION REPORT

Project Number: 1234567890 Project Name: Anchorage Area Drainage Improvements - McHugh Creek

Inspector Name: John Doe Inspector Title: Senior Inspector

Contractor Name: ABC Construction Company Contractor Address: 1234 Main St, Anchorage, AK 99501

Site Address: 5678 Hillside Dr, Anchorage, AK 99502

Inspection Date: 8/19/22

1. Did you identify any areas of potential erosion or sedimentation? ☒ Yes ☐ No

2. Did you identify any areas of potential sedimentation? ☒ Yes ☐ No

3. Did you identify any areas of potential erosion or sedimentation? ☒ Yes ☐ No

4. Did you identify any areas of potential erosion or sedimentation? ☒ Yes ☐ No

5. Did you identify any areas of potential erosion or sedimentation? ☒ Yes ☐ No

6. Did you identify any areas of potential erosion or sedimentation? ☒ Yes ☐ No

7. Did you identify any areas of potential erosion or sedimentation? ☒ Yes ☐ No

8. Did you identify any areas of potential erosion or sedimentation? ☒ Yes ☐ No

9. Did you identify any areas of potential erosion or sedimentation? ☒ Yes ☐ No

10. Did you identify any areas of potential erosion or sedimentation? ☒ Yes ☐ No

SWPPP Pre-Construction Inspection Report 8/19/22

Photo 26

Form 250-115 (12/2015)

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
SWPPP DAILY RECORD OF RAINFALL LOG

Project Number: 1234567890 Project Name: Anchorage Area Drainage Improvements - McHugh Creek

Date	Time	Amount (inches)	Direction	Notes
1/4/24	0	0.0	0°	
1/4/24	1	0.0	0°	
1/4/24	2	0.0	0°	
1/4/24	3	0.0	0°	
1/4/24	4	0.0	0°	
1/4/24	5	0.0	0°	
1/4/24	6	0.0	0°	
1/4/24	7	0.0	0°	
1/4/24	8	0.0	0°	
1/4/24	9	0.0	0°	
1/4/24	10	0.0	0°	
1/4/24	11	0.0	0°	
1/4/24	12	0.0	0°	
1/4/24	13	0.0	0°	
1/4/24	14	0.0	0°	
1/4/24	15	0.0	0°	
1/4/24	16	0.0	0°	
1/4/24	17	0.0	0°	
1/4/24	18	0.0	0°	
1/4/24	19	0.0	0°	
1/4/24	20	0.0	0°	

SWPPP Daily Record of Rainfall Log 1/4/24

Photo 27

Form 250-113 (12/2015)

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
SWPPP GRADING & STABILIZATION ACTIVITIES LOG

Project Number: 1234567890 Project Name: Anchorage Area Drainage Improvements - McHugh Creek

Inspector Name: John Doe Inspector Title: Senior Inspector

Contractor Name: ABC Construction Company Contractor Address: 1234 Main St, Anchorage, AK 99501

Site Address: 5678 Hillside Dr, Anchorage, AK 99502

Log Date: 12/21/23

Date	Time	Activity	Location	Notes
12/21/23	0	Grading	5678 Hillside Dr	
12/21/23	1	Grading	5678 Hillside Dr	
12/21/23	2	Grading	5678 Hillside Dr	
12/21/23	3	Grading	5678 Hillside Dr	
12/21/23	4	Grading	5678 Hillside Dr	
12/21/23	5	Grading	5678 Hillside Dr	
12/21/23	6	Grading	5678 Hillside Dr	
12/21/23	7	Grading	5678 Hillside Dr	
12/21/23	8	Grading	5678 Hillside Dr	
12/21/23	9	Grading	5678 Hillside Dr	
12/21/23	10	Grading	5678 Hillside Dr	
12/21/23	11	Grading	5678 Hillside Dr	
12/21/23	12	Grading	5678 Hillside Dr	
12/21/23	13	Grading	5678 Hillside Dr	
12/21/23	14	Grading	5678 Hillside Dr	
12/21/23	15	Grading	5678 Hillside Dr	
12/21/23	16	Grading	5678 Hillside Dr	
12/21/23	17	Grading	5678 Hillside Dr	
12/21/23	18	Grading	5678 Hillside Dr	
12/21/23	19	Grading	5678 Hillside Dr	
12/21/23	20	Grading	5678 Hillside Dr	

SWPPP Grading Stabilization Log 2022

Photo 28

Form 250-113 (12/2015)

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
SWPPP GRADING & STABILIZATION ACTIVITIES LOG

Project Number: 1234567890 Project Name: Anchorage Area Drainage Improvements - McHugh Creek

Inspector Name: John Doe Inspector Title: Senior Inspector

Contractor Name: ABC Construction Company Contractor Address: 1234 Main St, Anchorage, AK 99501

Site Address: 5678 Hillside Dr, Anchorage, AK 99502

Log Date: 12/21/23

Date	Time	Activity	Location	Notes
12/21/23	0	Grading	5678 Hillside Dr	
12/21/23	1	Grading	5678 Hillside Dr	
12/21/23	2	Grading	5678 Hillside Dr	
12/21/23	3	Grading	5678 Hillside Dr	
12/21/23	4	Grading	5678 Hillside Dr	
12/21/23	5	Grading	5678 Hillside Dr	
12/21/23	6	Grading	5678 Hillside Dr	
12/21/23	7	Grading	5678 Hillside Dr	
12/21/23	8	Grading	5678 Hillside Dr	
12/21/23	9	Grading	5678 Hillside Dr	
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12/21/23	14	Grading	5678 Hillside Dr	
12/21/23	15	Grading	5678 Hillside Dr	
12/21/23	16	Grading	5678 Hillside Dr	
12/21/23	17	Grading	5678 Hillside Dr	
12/21/23	18	Grading	5678 Hillside Dr	
12/21/23	19	Grading	5678 Hillside Dr	
12/21/23	20	Grading	5678 Hillside Dr	

SWPPP Grading Stabilization Log 12/21/23

Photo 29

Form 250-114 (12/2015)

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
SWPPP EMPLOYEE TRAINING LOG

Project Number: 1234567890 Project Name: Anchorage Area Drainage Improvements - McHugh Creek

Inspector Name: John Doe Inspector Title: Senior Inspector

Contractor Name: ABC Construction Company Contractor Address: 1234 Main St, Anchorage, AK 99501

Site Address: 5678 Hillside Dr, Anchorage, AK 99502

Log Date: 1/3/24

Date	Time	Activity	Location	Notes
1/3/24	0	Training	5678 Hillside Dr	
1/3/24	1	Training	5678 Hillside Dr	
1/3/24	2	Training	5678 Hillside Dr	
1/3/24	3	Training	5678 Hillside Dr	
1/3/24	4	Training	5678 Hillside Dr	
1/3/24	5	Training	5678 Hillside Dr	
1/3/24	6	Training	5678 Hillside Dr	
1/3/24	7	Training	5678 Hillside Dr	
1/3/24	8	Training	5678 Hillside Dr	
1/3/24	9	Training	5678 Hillside Dr	
1/3/24	10	Training	5678 Hillside Dr	
1/3/24	11	Training	5678 Hillside Dr	
1/3/24	12	Training	5678 Hillside Dr	
1/3/24	13	Training	5678 Hillside Dr	
1/3/24	14	Training	5678 Hillside Dr	
1/3/24	15	Training	5678 Hillside Dr	
1/3/24	16	Training	5678 Hillside Dr	
1/3/24	17	Training	5678 Hillside Dr	
1/3/24	18	Training	5678 Hillside Dr	
1/3/24	19	Training	5678 Hillside Dr	
1/3/24	20	Training	5678 Hillside Dr	

SWPPP Employee Training Log 1/3/24

Photo 30

Form 250-112 (12/2015)

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
SWPPP CORRECTIVE ACTION LOG

Project Number: 1234567890 Project Name: Anchorage Area Drainage Improvements - McHugh Creek

Inspector Name: John Doe Inspector Title: Senior Inspector

Contractor Name: ABC Construction Company Contractor Address: 1234 Main St, Anchorage, AK 99501

Site Address: 5678 Hillside Dr, Anchorage, AK 99502

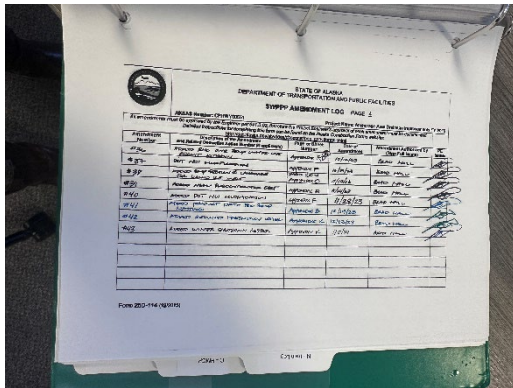
Log Date: 10/31/23

Date	Time	Activity	Location	Notes
10/31/23	0	Corrective Action	5678 Hillside Dr	
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10/31/23	2	Corrective Action	5678 Hillside Dr	
10/31/23	3	Corrective Action	5678 Hillside Dr	
10/31/23	4	Corrective Action	5678 Hillside Dr	
10/31/23	5	Corrective Action	5678 Hillside Dr	
10/31/23	6	Corrective Action	5678 Hillside Dr	
10/31/23	7	Corrective Action	5678 Hillside Dr	
10/31/23	8	Corrective Action	5678 Hillside Dr	
10/31/23	9	Corrective Action	5678 Hillside Dr	
10/31/23	10	Corrective Action	5678 Hillside Dr	
10/31/23	11	Corrective Action	5678 Hillside Dr	
10/31/23	12	Corrective Action	5678 Hillside Dr	
10/31/23	13	Corrective Action	5678 Hillside Dr	
10/31/23	14	Corrective Action	5678 Hillside Dr	
10/31/23	15	Corrective Action	5678 Hillside Dr	
10/31/23	16	Corrective Action	5678 Hillside Dr	
10/31/23	17	Corrective Action	5678 Hillside Dr	
10/31/23	18	Corrective Action	5678 Hillside Dr	
10/31/23	19	Corrective Action	5678 Hillside Dr	
10/31/23	20	Corrective Action	5678 Hillside Dr	

SWPPP Corrective Action Log 10/31/23

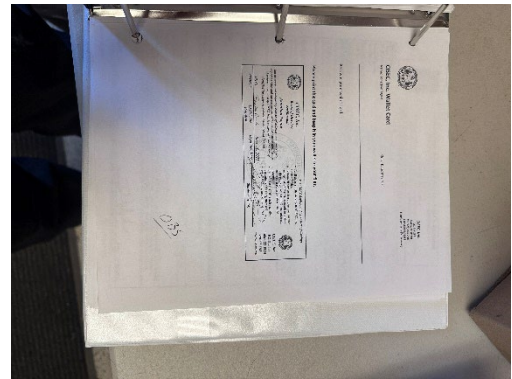
Photo Addendum

Photo 31



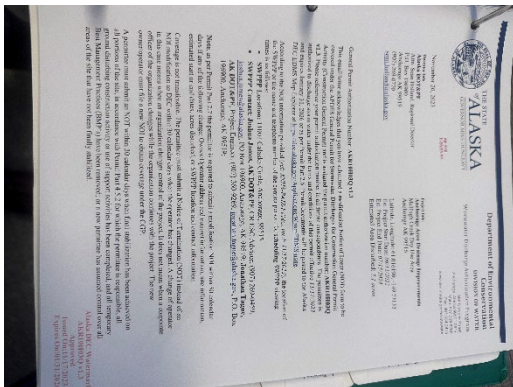
SWPPP Amendment Log 1/5/24

Photo 32



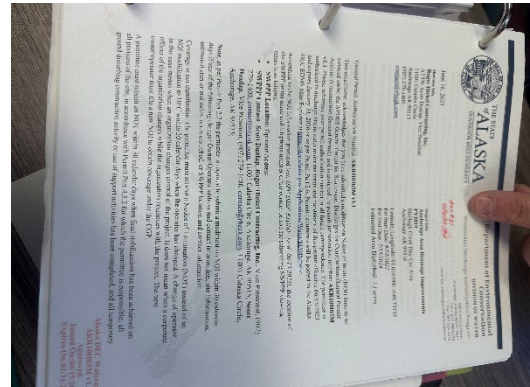
CESCL Certification Jonathan Tague ADOT&PF

Photo 33



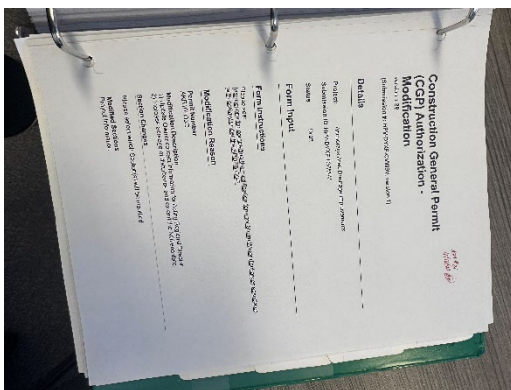
Authorization letter, AKR10H03Q

Photo 34



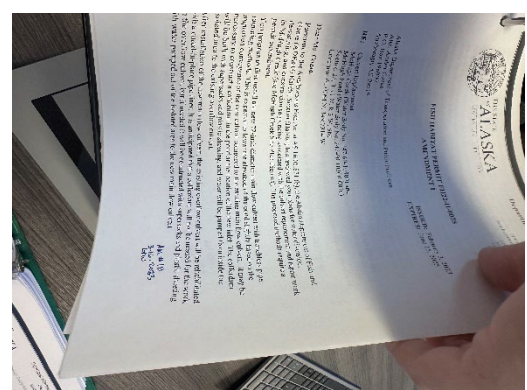
Authorization letter, AKR10H03Q

Photo 35



AKR10H03Q NOI

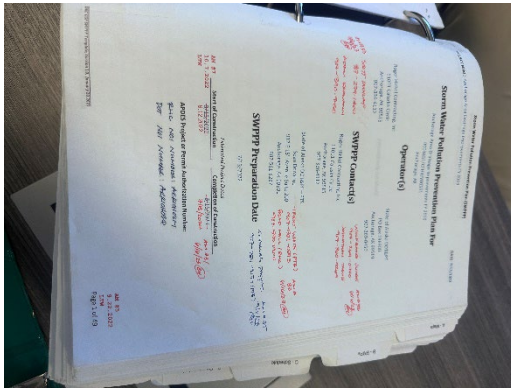
Photo 36



Fish Habitat Permit (FH22-11-0028)

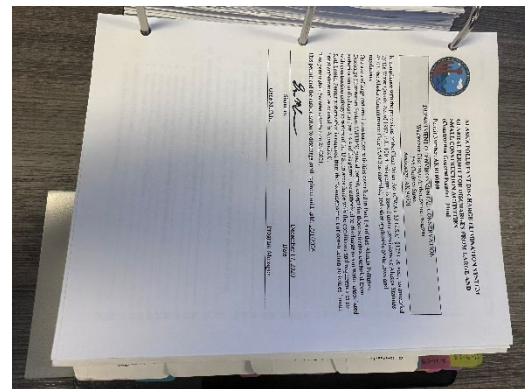
Photo Addendum

Photo 37



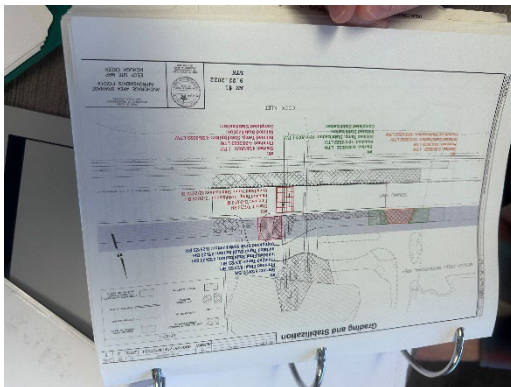
SWPPP Binder

Photo 38



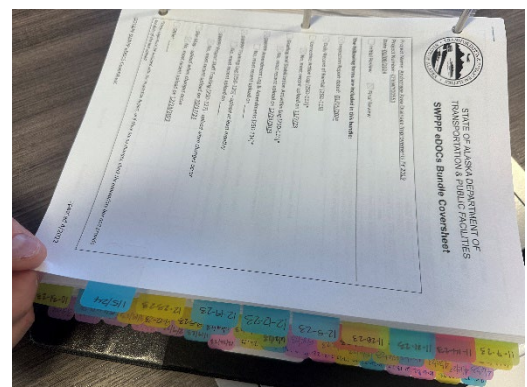
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Photo 39



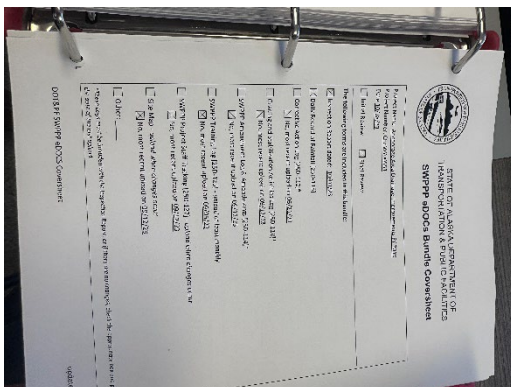
SWPPP Map

Photo 40



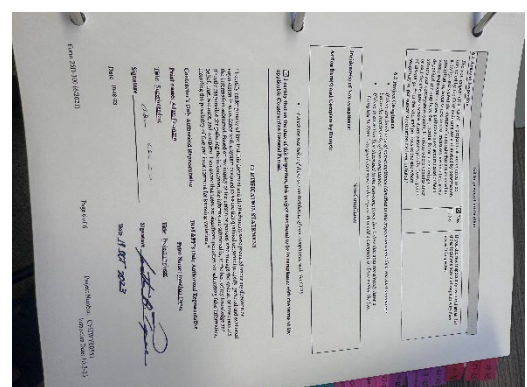
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Photo 41



SWPPP Inspection Report 11/28/23

Photo 42



SWPPP Inspection Report Certification 12/5/23