



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Environmental
Conservation

DIVISION of Water
Anchorage

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12/8/2025

Kristi Bischofberger
Municipality of Anchorage
PO Box 196650
Anchorage, AK 99519

Eric Miyashiro
Alaska Department of Transportation and Public Facilities (DOT)
PO Box 196900
Anchorage, AK 99519

SUBJECT: APDES Inspection of Municipality of Anchorage & State DOT MS4, Authorization
Number AKS052558

Dear Ms. Bischofberger and Mr. Miyashiro;

Per the Alaska Pollutant Discharge Elimination System, an inspection of the Municipality of Anchorage & State DOT MS4 was conducted and completed on October 28, 2025. 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 black ink, appearing to read "Nicole Warner".

Nicole Warner, Environmental Program Manager II
Credential No. 327864

Check One:

- Personally Served
 Emailed

on the 9 day of December, 2025

Enclosure: AKS052558 IR

cc:

DEC.Water.APDESData@alaska.gov



APDES INSPECTION REPORT

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

Section 1: General Data

APDES Discharge Number	Announced / Unannounced	Receiving Waters	Inspection Date
Number: AKS052558	Announced	U.S. Waters located within the corporate boundary of the MOA	Date: 3/4/2025 to 10/28/2025
Effective: 8/1/2020			
Expiration: 7/31/2025			

Section 2: Facility Data

Name of Facility: Municipality of Anchorage & State DOT MS4

On-Site Representative/Physical Address:

Name: Kenna Phillips
 Title: Acting Watershed Manager
 Company: Municipality of Anchorage (MOA)
 Address: PO Box 196650 Anchorage, AK 99519

Phone: (907) 343-8023
 Email: kenna.billups@anchorageak.gov

Responsible Party/Mailing Address:

Name: Kristi Bischofberger
 Organization: Municipality of Anchorage (MOA)
 Title: Watershed Manager
 Address: PO Box 196650
 Phone: 907-343-8058
 Email: bischofbergerkl@muni.org

Name: Eric Miyashiro
 Organization: Alaska Department of Transportation and Public Facilities (DOT)
 Title: Manager
 Address: PO Box 196900
 Phone: 907-269-0610
 Email: eric.miyashiro@alaska.gov

Additional Inspection Participants:

Municipality of Anchorage - MOA
 Kyle Cunningham, Paul Lacsina, CJ Weed, Tony Winsor, Steve Ellis, Gaylon VanLandingham, James Belz, Gregory Soule, Jeffery Urbanus, Rae De Ley, & Ernest Stoltenberg

Department of Transportation - DOT
 Renee Goentzel, Ronald Searcy, Steve Church

For internal use only:

Off-Site Compliance Evaluation: Yes No
 NAICS: 924110 - Administration of Air and Water Resource and Solid Waste Management Programs

Section 3: Findings

Background/Regulatory Status/Compliance History

The Municipality of Anchorage (MOA) and the Alaska Department of Transportation and Public Facilities (DOT) are authorized to discharge storm water (SW) from the municipal separate storm sewer system (MS4) per the Alaska Pollutant Discharge Elimination System (APDES) Anchorage Municipal Separate Storm Sewer System individual permit AKS052558.

The MOA and DOT are considered co-permittees under this MS4 permit. The MS4 is owned and operated by the permittees and located within the corporate boundary of the MOA. Surface runoff within the MOA is directed to a network of subsurface conveyances, ditches, and surface streets. These systems provide drainage for an area of approximately 1,955 square miles, which includes the areas under the direct jurisdiction of the MOA, as well as the smaller communities of Eagle River, Girdwood, Chugiak, and Eklutna.

This is the seventh inspection by the Department of Environmental Conservation (DEC). The last inspection was conducted between May 18, 2023, and November 28, 2023, and no violations were found.

This inspection took place over the following dates and times:

March 4, 2025 – 2025 APDES Annual Update Meeting, BP Energy Center

March 26, 2025 – Term IV Semi-Annual Meeting

April 3, 2025 – MS4 Review and Site Selection Meeting

May 1, 2025 – MOA MS4 Pre-Inspection Meeting

May 15, 2025 – DOT MS4 Pre-Inspection Meeting

May 28, 2025 – Girdwood drainage complaint follow-up

May 29, 2025 – DOT&PF Seward Hwy MP 75-90 Project, Glacier Creek Maintenance Storage inspection

June 2, 2025 – O’Malley Snow Dump Inspection and Frontage Rd site visit

August 20, 2025 – Stakeholder meeting with Titan LLC

October 28, 2025 – MOA APDES Term V 2025 Semiannual meeting

A review of Environmental Compliance History Online (ECHO) and Integrated Compliance Information System (ICIS) appears to indicate that this facility is in a state of significant noncompliance for the period of this evaluation. ECHO shows 7 quarters of significant noncompliance violations. However, ECHO is referencing two missing MS4 Program Reports that were due February 2024 and February 2025. MOA/DOT have submitted both said missing MS4 Program Reports on time. Due to their size, they were unable to be submitted via the usual channels in EDMS, which may explain why these items are not showing as received in ECHO.

Field Inspection

Introductions were exchanged and inspector credentials were presented upon commencing the interview portion of the inspection and upon arrival at the sites chosen for onsite inspection.

Due to the size and scope of this MS4 permit, this inspection and corresponding report focuses mainly on items due between year 3-5 of the permit term. This inspection and report also addresses complaints received by the DEC and areas of concern from the previous inspection, conducted in 2023.

This inspection covers the following topics:

- Permit requirements/action items due between 2023 and 2025 (years 3-5 of the permit)
- General project and permit updates
- Catch basin facility updates
- MOA Watershed Updates presentations
- Girdwood drainage public complaint
- Girdwood Maintenance Facility (Glacier Creek Maintenance Storage)

- O'Malley DOT Snow Site
- Frontage Road snow site
- Titan Topsoil permitting and compliance updates
- University Lake sheening events and repair updates

MS4 Permit Requirements Organized by Deadline (Years 3–5):

Due by Third Year Annual Report (2023)

- [X] Submit evaluation report on animal facility program.

Due by Fourth Year Annual Report (2024)

- [X] Submit updated inventory of industrial and commercial facilities.
- [X] Submit evaluation report on snow disposal sites.
- [X] Evaluate and report status of Green Infrastructure/LID pilot projects.
- [X] Evaluate monitoring results.

Due within 4 Years of Permit Effective Date (by August 1, 2024)

- [X] Revise ordinance or other regulatory mechanisms (construction site runoff).
- [X] Update construction storm water manual.
- [X] Revise ordinance or regulatory mechanisms for permanent stormwater controls.
- [X] Revise animal facility requirements as needed.
- [X] Update Street Maintenance SOPs.

Due by End of Permit Term (by July 31, 2025)

- [X] Build and operate facility to process catch basin and inlet cleaning materials (see notes below).
- [X] Complete and submit one watershed plan.
- [X] Submit scoping document for watershed plan.
- [X] Evaluate and update Storm Water Design Criteria Manual.

Permit Renewal Deadline (February 1, 2025)

- [X] Submit permit reapplication (180 days before expiration).

All of the items above were submitted in a timely manner.

General Project/Program Updates

The following information was provided verbally or in writing by onsite representatives:

- R&M Consultants is working on an assessment project for University Lake and the Alaska Native Tribal Health Consortium (ANTHC) campus MS4 system. A report is expected to be ready by early spring 2026.
- Alaska Water and Wastewater Utility (AWWU) will discontinue allowing construction dewatering to be discharged to sanitary sewer starting in 2026. MOA and DEC are working on a permitting process to allow construction dewatering to the MS4, with measures to ensure dewatering discharges will not violate APDES permit terms or Anchorage Municipal Code. DOT will need to be a part of the review

and approval process when dewatering will be discharged to a DOT owned or shared MS4 system. There have been recent incidents of non-permitted dewatering to the MS4.

- The 2026 APDES Annual meeting will be held on March 10, 2026, from 9am-12:30pm at the BP Energy Center in Anchorage.
- DOT is still working on the new Oil and Grease Separator (OGS) facility, but the intent is to have it in place for OGS cleaning contractors next summer.
- 17 MOA construction projects are upcoming for 2026.
- The VanLandingham/West Anchorage Snow Disposal site is substantially complete and will be used for snow storage this winter (2025-2026), and construction will be finished up after snow melts next spring/summer.
- The old snow disposal site at Kloep Station/St. Maintenance Northwood will not be used this winter, as the lease from the State was not renewed.
- The Dowling, Jewel Terrace, Forest Park Dr., and Eagle River traffic mitigation projects are all substantially complete. The 42nd St construction project still needs some intersection work.
- The Pippel Place & Ski Rd. projects will have Green Infrastructure components (infiltration basins).
- The Camrose Dr. storm drain project incorporated large OGS structures and flood alleviation.
- MOA will add the University Lake outfall to their monitoring list for 2026. The lake level survey showed that lake levels are down in general.
- All catch basin and OGS cleanings for 2025 went well and as expected.
- Around 300 structures will be cleaned by contractor Smith and Sons. All OGS waste is processed at Kloep OGS facility, so there is no need for any OGS waste to go AWWU.
- The MOA Watershed Management Services (WMS) and Survey sections will be updating the GIS mapping during winter 2025-2026 both DOT and MOA.
- According to the 2024 Annual Report, a document review during the fourth term of 2024, combined with regular use and community feedback, the Storm Water Design Criteria manual continues to be current with regard to regulation. Minor administrative edits are postponed until a substantial update is warranted. The design criteria may be found on the WMS website.
- The 2024 annual report also states that the Construction Stormwater Manual was reviewed and continues to be aligned with current regulations and did not require further updating. It is incorporated as Volume 2 of the Anchorage Stormwater Manual recently adopted by the Anchorage Assembly.
- DOT resurfaced the Knik River bridge over the summer of 2025, as well as repairs to the North Peters Creek bridge.

Catch Basin and Inlet Cleaning Update

- MOA has a storm water sediment management facility on Northwood Drive. The facility isn't large enough to accommodate DOT&PF as well, so DOT&PF Maintenance & Operations (M&O) has been designing and getting permits for their own facility in the state-owned yard located on state-owned land within a fenced yard at the southeast corner of Dr. Martin Luther King Jr. Avenue and Tudor Road..
- DOT&PF M&O obtained a conditional use permit from MOA for the facility in July 2025. DOT also submitted a Title 23 fill and grade permit application on August 4th, 2025, and were informed that they needed to submit a Storm Water Pollution Prevention Plan (SWPPP) to the MOA before construction can begin (the facility will be under one acre, but over 10,000 sf).
- DOT is drafting this SWPPP as of September 16, 2025.
- The Anchorage district superintendent has been working on ordering the materials, but the ecology blocks needed to construct the settlement chambers and solids pad walls are not available in the type

and quantity that they need. Their district superintendent placed an order for them, but the blocks won't be available until May 2026. Construction likely will not begin until the spring of 2026.

- Their contractor continues to use their own facility in Big Lake to process catch basin cleaning materials.
- Renee Goentzel (DOT) informed Sam Kito (DEC) of the above information when they met on 8/27/2025 and Mr. Kito said that they are still under the 2020 permit. The new permit will include language to give DOT more time to get the facility built.

Watershed Planning Update

- According to the 2024 Annual Report, MOA and DOT have two existing watershed plans. The Little Campbell Creek Watershed Plan and the Chester Creek Watershed Plan were developed under the guidance of working groups composed of diverse agency interests and supported by staff from WMS, the U.S. Fish and Wildlife Service, and the Anchorage Waterways Council.
- In the third term, the permittees completed a scoping document for a Campbell Creek watershed plan. The scoping document identified whether activities in the watershed are beneficial in accomplishing site-based low-impact development (LID) practices and recommended future actions to obtain identified goals. The scoping document identified Campbell Creek for developing a watershed plan, which is currently under development.
- Prior to the end of the permit term, a scoping document will be completed considering the benefits of existing watershed plans toward accomplishing site-based LID practices. It will also identify and guide the direction for additional watershed plans.

2025 APDES Annual Update Meeting, BP Energy Center, March 4, 2025

- MOA and DOT host an annual update meeting where they provide monitoring updates, project updates, and presentations on permit progress to their stakeholders.
- At the time of the meeting (March 4, 2025), MOA and DOT were finishing up their last year of the MS4 permit term, and had applied for their 5th five-year term. Nick Waldo and Sam Kito from DEC Permitting were coordinating with MOA and DOT on the upcoming permit application.
- Below are summaries from some permit-related presentations; this is not an exhaustive list.
- Pesticide Screening (Margaret Zhu, HDR)
 - Three closed-basin lakes (Lake Otis, Hideaway, and Little Campbell Creek (the control lake)) were sampled in 2022 and 2024.
 - Sampling was conducted at the end of summer during both a dry event and a rain event.
 - Sampling occurred above the deepest part of the lake, one meter below the surface.
 - Samples were analyzed for temperature, pH, 2-4-D, and carbaryl.
 - In 2024, no pesticides were detected.
 - HDR plans to request to discontinue the screening program, and instead pivot towards continuing education effort with the community.
- Stormwater Outfall Monitoring (Cindy Helmericks, HDR)
 - Per MS4 regulations, outfall monitoring is conducted to assess annual pollutant loading, assess stormwater control effectiveness, and measure where TMDL objectives are met.
 - 10 priority outfall sites have been identified, and geographically distributed across the MS4 footprint.
 - These sites represent a variety of subbasin land-use types (industrial, mixed, residential).

- These outfalls discharge to the Campbell Creek, Chester Creek, and Furrow Creek watersheds.
- Monitoring is conducted after 0.1 inches of precipitation falls in 24 hours, preceded by 24 hours of precipitation under 0.1 inches.
- The discharge calculated from flow velocity and outfall geometry.
- Samples are analyzed for flow, conductivity, dissolved oxygen, temperature, odor, color, clarity, and sheen.
- In 2024, the monitoring period spanned from July to September.
- The field measurements in 2024 showed consistent temperatures.
- One samples came back with high turbidity at outfall SWM09A, with another spike at SWM10 on September 11, 2024.
- Outfall SWM10 had a spike of Total Suspended Solids (TSS) during storm 4.
- Overall, levels of copper decreased from the levels observed in 2021 to 2023.
- Fecal coliform results in 2024 were above historical averages observed in 2018 through 2023, but were below the levels observed in 2017 to 2018.
- Outfall SWM12 had a fecal result of 51,000 CFU/100mk during storm 2.
- All samples were below the Alaska Water Quality Standards limits for TAH and TAqH.
- Average TPAH concentrations were below the minimum detection limit (MDL) in 2024.
- TPAH concentrations were higher in 2023 (namely TAH BTEX), but was still below the limits.
- The observed high loading of BTEX in 2021 came back down in 2023 and 2024.
- In 2024, total precipitation levels were higher than normal.
- Dry Weather Screening (Chris Keil, HDR)
 - This screening is meant to detect discharges not entirely composed of stormwater.
 - Full screening was conducted in June through August.
 - These screenings were conducted after at least 48 hours of dry weather following storm event
 - Screening monitoring over 30 outfalls.
 - Staff checking samples for debris, scum, odors, etc.
 - If discharge was suspected, samples were testing for further analytes (including pH, chlorine, copper, and phenols).
 - The watersheds monitored included Campbell, Chester, Fish, Furrow, Hood, and Ship Creek.
 - In 2024, one sample analyzed for illicit discharge in the Chester Creek watershed had exceedances for fecal coliform.
 - In 2023, samples that showed higher levels of detergents were attributed to be likely due to ATV washing.
 - Letters were sent to local businesses for awareness.
 - Higher fecal results may be from homeless activities in area.
 - A small area near Porcupine Creek was investigated after some white material (thought to be sewage waste) was discovered. MOA worked with the Alaska Water and Wastewater Utility (AWWU) to determine if there were any illicit connections. No point source was determined.

Girdwood Drainage Complaint Follow Up

- DEC received a citizen complaint on March 20, 2025 (complaint ID 275 on the Wastewater Complaint online database) regarding flooding concerns related to the Old Girdwood drainage.
- The complainant alleged that Heritage Land Bank (HLB)'s mismanagement of Old Girdwood was resulting in illicit discharges to navigable waters, in noncompliance with the MOA's APDES MS4 permit AK2052558. They alleged that Old Girdwood was extensively flooded year round with

stormwater runoff from the highways and gas station due to the lack of adequate drainage and culvert maintenance, and that their property was covered with 5-7' of standing contaminated water year round.

- This complaint was referred to Kyle Cunningham with MOA. The sheen present in the complaint photos was suspected to be organic based on the presence of the orange/rust colored material (byproducts of natural iron oxidizing bacteria).
- Inspector Nicole Warner, along with MOA staff, visited the site on May 28, 2025.
- The Old Girdwood drainage is a 37" culvert under the New Seward Highway.
- The culvert is located in a wetland/low point, and drains via a meandering channel out to the Turnagain Arm.
- There is a 21-foot flood level at the road.
- Outflow was observed from the culvert during high tide during the site visit.
- Inspectors looked through the culvert and could see to the other side, with a 4" clearance of space from the water surface to the top of the culvert. No sedimentation or blockage was observed.
- Stain lines were present on the steel of the culvert.
- Minnows were observed at the culvert mouth.
- DOT staff have discussed options for this culvert, but during these discussions, the Alaska Department of Fish and Game expressed that they do not want the culvert changed due to the potential impact on fish passage.
- DOT is in charge of maintenance of the Old Girdwood culvert. They last fixed the bridge that goes over the culvert in 2020.
- Seven & I Holdings (the same owner of the 711 gas station in Houston, AK) owns the neighboring stormwater system. Trash was observed in the Girdwood gas station clean out basins.
- The ditches along the highway are cleaned out on a 4-5 year rotation, or as needed.
- Inspectors walked some of the neighboring streets and observed the sheens mentioned in the complaint. All observed sheens were biogenic in nature.
- DOT confirmed that the bike paths on the Alyeska Highway are sanded and plowed by MOA.

Girdwood Maintenance Facility (Glacier Creek Maintenance Storage)

- On May 29th, 2025, inspector Nicole Warner visited the Glacier Creek Maintenance Storage facility with Renee Goentzel (DOT) and facility foreman Paul Bertholl.
- This inspection included a review of the Stormwater Pollution Prevention Plan (SWPPP), the 2023-2024 Annual Inspections, Corrective Action Log, 2023-2024 Training Logs, spill response procedures, spill logs, an inventory of spill equipment (app H of SPCC, premade kits), and material inventory logs.
- This facility discharges stormwater at Outfall A. There are silt fences, straw wattles, and hydroseeded areas to mitigate flow.
- The facility stores sand and salt brine for road distribution. They also store explosives for the avalanche response program.
- The facility orders supplies through Lawson or Bollman. The Safety Data Sheets (SDSs) are attached to the paperwork in their quarterly order.
- The Anchorage DOT admins track and order supplies, including the logs for the sand, salt, chemicals, and light poles.
- These logs are reported annually through MMS (switched from Agile Assets last year).
- Aerosol cans and regular batteries are taken to Hazardous Waste disposal facilities.
- DOT's Public Facilities division replaces the lights, and the DOT state fleet takes the used batteries.
- DOT's Alaska Waste division picks up trash from the dumpsters on a weekly basis.

- The facility is a very small quantity generator (VSQG) for hazardous waste.
- DOT's Public Facilities division owns the oil tanks and fences at the site, and are responsible for the associated placards.
- Shoreside Petroleum fuels the tanks on site.
- A separate contactor annually cleans the oil water separators on a yearly basis.
- Howitzer parts are stored on site for the Avalanche Program.
- The Alaska State Troopers store marine vessels and small amounts of fuel in their designated shed on site.

O'Malley DOT Snow Site

- During the last DEC inspection, excessive snow fall had strained the snow site best management practices (BMPs). There was still too much snow present to fully clean up the trash inside the berm during that inspection in May 2023.
- Inspector Nicole Warner visited the site with MOA and DOT personnel on June 2.
- Nearly all of the snow on site had melted by the time of inspection. Any remaining snow mostly congregated near Outfall B.
- The site is inspected on a quarterly basis by DOT.
- Trash pickup was planned to occur around July.
- The BMPs around Outfall B were in good condition and operating properly.
- The wattles are replaced as needed.
- DOT plans to regrade the snow site floor between September and October of 2025.
- The berms were seeded and are awaiting vegetation growth.
- Due to future road construction plans, the pathway around the snow site will shift, and Outfall B will no longer be in operation at that time. These projects are still in development.
- DOT still maintains concerns that the site does not have enough capacity for future snow events. There are still plans to try to expand into other nearby sites (such as the O'Malley road site, as part of the O'Malley Road Construction project).

Frontage Road Site

- MOA staff and inspector Nicole Warner visited a reported snow dump site on 1310 Frontage Rd.
- The site is about 4 acres and is located next to the North Fork of Campbell Creek.
- Official permits were not yet signed off by MOA at the time of the inspection.
- No SWPPP information was posted at the site.
- Inadequate best management practices (BMPs) were observed, including straw wattles and silt fences that were not staked down correctly.
- CJ Weed will follow up with this site to ensure proper documentation is finalized.

Titan Topsoil LLC Inspection:

- During the last DEC inspection for the MOA/DOT MS4, DOT reported track out onto C Street. from the Titan Topsoil LLC (Titan) main site.

- Since the last inspection, Titan has added another topsoil site to their main facility parameters.
- POA-2023-00117 Titan Fill is the southside property across 106th street from the main Titan site, which is also owned by Todd Christianson. That site has a wetland fill permit and may meet the eligibility requirements for a Construction General Permit (CGP) since the construction site is expected to be over an acre and drains to the MS4.
- DEC documented a separate compliance inspection for the main Titan site in 2023 (authorization number AKU000401). The main concerns resulting from that inspection were discharge to the MS4 and tracking dirt onto C Street. Titan Topsoil (owned by Todd Christianson) has incompatible uses on site. The landscape soil storage area doubles as the snow storage area. Turbid discharge and tracking concerns occur frequently and have been ongoing for years. DEC submitted a Compliance Letter to Titan in 2023. The deliverables included a requirement to submit an NOI (including the SWPPP) by June 13, 2025.
- On October 11, 2023, after coordinating with DEC and DOT, MOA sent Titan a notice of violation (NOV) for turbid discharge to the MS4 and vehicle track out. The incompatible land use of snow site and topsoil in the same footprint was grandfathered, but MOA determined it could enforce on the illicit discharge and vehicle track out.
- This NOV required deliverables (including a SWPPP and MSGP application) by snowfall.
- On October 20, 2023, DEC inspector Elizabeth Stergiou received an email from Ross Victor stating that Stantec has been retained by Titan to resolve the NOV sent by MOA.
- DEC approved a request by Titan for the extension to their schedules of compliance (SOC) deadline from (fill in the original date) to November 25, 2023.
- On May 8, 2025, DEC sent an email reminder regarding the outstanding SOC and advised Titan of the CGP requirements. DEC also provided links to the MSGP, CGP, and EDMS resources, and attached a copy of the 2023 compliance letter. This email was also sent to MOA and DEC Permitting for visibility.
- On May 15th, 2025, DEC received an email from DOT with pictures showing unmaintained control measures and turbid water draining to the MS4 by Titan?.
- On July 9, 2025, DEC sent a email reminder to Mr. Christianson regarding the SWPPP review and the requirement to submit a SWPPP that meets permit requirements.
- Titan submitted a notice of intent (NOI) for its southside site on July 9, 2025.
- On August 20th, 2025, Titan met with members from DEC Compliance, DEC Permitting, and MOA to discuss current conditions and next steps.
- The following information was ascertained from this meeting:
 - Titan initially hired Stantec to manage the environmental compliance for the site. Todd Christianson thought Stantec had already reached out to DEC regarding the ongoing deliverables.
 - Since the start of this situation, Titan has hired a number of consultants, but have encountered communication and expectation challenges.
 - Titan Topsoil LLC has now hired Shawn Trasky for the environmental compliance portion of their sites.
 - Gage Christianson and Kelsey Cruce will be the points of contact for the future construction projects.
 - Gage is currently out of state, but plans to regularly travel back to Alaska.
 - MOA clarified that all runoff from the property needs to be contained on-site and meet water quality standards before leaving the site.
 - The site contains four different parcels (some for snow storage, some for landscaping operations) that will likely require separate SWPPPS.

- Todd Christianson emphasized a desire to meet these requirements, but also expressed frustration at the lack of clarity on the next steps. He confirmed that the completed SWPPPs will be living documents, and that their control measures will be monitored and updated based on the site conditions.
 - A variety of control measures are planned for the site, including a perimeter silt fence, rock checks, and sedimentary basins.
 - Titan (via Shawn Trasky) planned to submit the SWPPP the day after the meeting.
- On August 29, 2025, DEC reviewed the SWPPP and sent Mr. Christianson a follow-up email with a list of ten examples of items missing from the SWPPP.
 - On September 2, 2025, DEC responded to Mr. Christianson's emails requesting documentation regarding the contractor he originally hired to respond to the compliance letter. No documentation was found in DEC files or EDMS. This email included information on how to get to the events tab in EDMS to see the communications to date.
 - On September 9th, 2025, DEC met with Todd Christianson, Shawn Trasky, and Kelcey Cruce to answer questions Shawn Trasky posited about the SWPPP requirements.
 - On September 17th, 2025, DEC responded to an email from Mr. Christianson clarifying that snow site discharge and BMPs will need to be described in the SWPPP.
 - On September 22, 2025, DEC received an email from Mr. Christianson addressed to MOA (and cc'd DEC) alleging that MOA and DEC were not providing adequate information on what was missing from the SWPPP and notifying MOA and DEC that Titan was in the process of obtaining legal counsel.
 - On October 2, 2025, DEC (both Compliance and Permitting) sent another email to Shawn Trasky regarding the SWPPP deficiencies.
 - On October 6, 2025, DEC responded to Mr. Christianson's email (dated October 3) and referred to the MSGP parts for the items that must be in the SWPPP, attached copy of the MSGP, and referred to DEC's August 29th, 2025, email with examples of what was missing from the submitted SWPPP.

University Lake Sheening Events:

- Several sheening events were observed at the University Lake outfall associated with the ANTHC campus, including two unknown source sheen events (one in mid May 2025, one in mid June 2025).
- A third sheening event was observed on July 11th, 2025, but was suspected to be biogenic in nature.
- The OGS system that is installed above the University Lake outfall that is associated with the ANTHC campus was installed in 1991 and is suspected to now be undersized for the campus.
- The OGS was last pumped out on June 18th, 2025, including a powerwash and scrubbing.
- There are multiple operators present on the ANTHC campus that discharge stormwater into the stormwater system that leads to University Lake.
- Sheening events have been reported at this location before. In past years, it was due to a broken hydraulic line that spilled into the storm drain system. No sources were identified this year.
- A large construction and dewatering project (AKG002350) is located close to the area of concern. The project is within 1500 feet of the Alaska Native Medical Center (ANMC) contaminated site. Dewatering discharges would be treated and discharged to the sewer lines that lead to University Lake.
- June Sheen Events Details:
 - On June 17th, 2025, at approximately 10:00 AM, a sheen of unknown origin was observed on the surface of University Lake near the southwest shoreline, in proximity to an oil and grit separator (OGS) outfall associated with the ANTHC property.

- On June 18th, 2025, Geosyntec mobilized to University Lake to characterize surface water. Republic Services LLC (Republic) was on site when Geosyntec arrived, deploying containment boom and sorbent boom around the OGS outfall. Republic was also deploying sorbent pads to mop up visible sheen from kayaks.
- Geosyntec collected three primary surface water samples for analysis of polyaromatic hydrocarbons (PAHs) by SW8270E using selective ion monitoring (SIM) and petroleum-related volatile organic compounds (VOCs) by solid waste method (SW)8260D.
- These compounds allowed calculation of total aromatic hydrocarbons (TAH) and total aqueous hydrocarbons (TAqH).
- After Geosyntec finished collection of surface water samples, a Republic vacuum truck arrived on site. Republic removed 2,100 gallons of surface water from inside the containment booms, after which no sheen was visible.
- Republic containerized used sorbents into open-top 55-gallon drums. Impacted water and used sorbents were transported to Republic's facility on Viking Drive for recycling.
- Analytical data indicates surface water at University Lake was not impacted by the release at concentrations that exceed surface water criteria.
- July Sheen Events Details:
 - On July 14th, a sheen on University Lake was reported to SPAR in the evening. SPAR personnel responded to the report the next morning on July 15th and visited the site.
 - SPAR observed viscous products on the water. No rainbow/silvery sheen was observed, but when the sheen was swirled with a stick, it formed a lot of bubbles and then retracted in a circular area into itself with a raised lip (about 1mm) similar to petroleum.
 - SPAR applied multiple types of absorbent pads to the sheen in the boomed area by the outlet (which each pad specializing in different products: glycol, oil, and universal). The oil-specific pads did not absorb anything. The glycol pad appeared to only absorb the lake water. The universal pad absorbed both the sheen and lake water and sunk unusually quickly.
- September Sheen Events Details:
 - Cynthia Kirkham (SPAR) received a report about new sheening at University Lake on the evening of September 11th, 2025, from the NOAA Scientific Support Coordinator who is familiar with the sheening events at the culvert into the lake. The photo showed a sheen similar to the emulsified hydraulic oil associated with last year's loader incident. It appeared the emulsified product was partly suspended in the water column.
 - Torri Huelskoetter (On-Scene Coordinator from the EPA Region 10 Emergency Response Section) emailed and confirmed the reports of the sheen on University Lake on September 11th, 2025, and sent photos of the sheen to SPAR, DEC Compliance and Enforcement, and Stormwater Permitting. Huelskoetter reported that the sheen extended from the culvert to where Chester Creek entered the lake. She added, "This seems to happen almost every time we get significant rainfall event which feels like a lack of maintenance from the muni for a known issue in an area that is heavily utilized by people and animals."
 - DEC notified MOA and ANTHC that DEC has received report of something going into the lake from the culvert outlet drain from the OGS. SPAR visited the lake and witnessed something still discharging into the lake from the culvert at least 100' out into the center of the lake. It mostly appeared to be suspended in the water column and as a result was unrecoverable at that time.

- MOA also visited the site and that there was a sediment plume leaving the outfall. MOA was able to locate the source, which was the construction site where the hospital expansion was taking place, along Tudor Centre Drive. There was sediment leaving the site and entering the storm drain system. MOA checked the OGS, and there was no evidence of sediment at the surface. The sediment is being flushed through the system at a rapid rate due to the rain event that occurred.
 - DEC confirmed that the suspended substance observed in the lake was likely this sediment. However, there were also reported of a larger amount of petroleum sheening on the water surface the night before. Reports stated that this sheening extended all the way to the east on the lake near the location where Chester Creek drains into the lake, but it was heaviest near the culvert.
 - Sydney Bish (an inspector with DOW Compliance and Enforcement) had recently inspected the project responsible for the sediment release. The BMPs were working correctly during the time of inspection. She contacted the project contact to inform them of the noncompliance event and remind them to report it according to their permit requirements. The permittee responded the same day, confirmed they would report it according to the NCN requirements, and confirmed that he spoke with both Mass X and Davis superintendents and replaced the broken sand bag on the inlet. Wattles were placed behind the curb where the water could have exited the work area. They confirmed that they would review what else may need to be addressed to prevent further non-compliance events.
- Kenna Phillips confirmed that the University Lake outfall (Node ID 4-1) was sampled in the 2021 Dry Weather Sampling and this year’s 2025 Dry Weather Sampling.
 - The 2024 University Lake spill entries were not included in the Illicit Discharge map as part of the Annual Report. MOA has since added these entries into their database. They maintain an internal map of all illicit discharges, which is not publicly accessible. (MOA is “currently shopping around for a new database software because we recognize that the software we have now is not meeting our needs. We are learning towards [OpenGov Stormwater Management](#) to better assist us.”)
 - MOA reported that in response to the 2023 NOV to ANTHC, ANTHC submitted the deliverable that Kristi Bischofberger requested. They improved the water sealing of the fuel vault itself, placed preventative damming and absorbents in the vault, and physically inspected the vault daily.
 - The MOA has contracted R&M Consultants, Inc. to provide engineering services to evaluate the stormwater drainage system within the Tudor Centre subbasin. The consultants will also identify and analyze possible system upgrades and alternatives for improved treatment and discharge from the associated drainage area. R&M plans to have a Design Study Report (DSR) by March 2026. Once the DSR is completed, the next step in the design process will take place.
 - No reports/complaints about University Lake for 2025 have been submitted through [ANCWorks](#). MOA requested DEC start submitting information about these events through the hotline.

Sampling	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
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No sampling was conducted as part of this inspection.

Records Review

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

- Watershed Management website
- 2023 & 2024 Annual Reports
- 2024 Industrial Facilities Inventory
- MOA training videos [MOA Stormwater - YouTube](#)

- DOT training site <https://dot.alaska.gov/stwddes/desenviron/resources/training.shtml>
- WMS Drainage Viewer (storm sewer system map and inventory)
- 2023 & 2024 MOA & DOT MS4 Street Sweeping *Reports*
- Prohibited Discharges Complaint Log
- 2023 & 2024 Dry Weather Screening Reports
- 2023 & 2024 Stormwater Outfall Monitoring Reports
- SWPPP for Glacier Creek Maintenance Storage
- 2024 Animal Facilities Report
- Construction Complaint log
- DOT&PF Maintenance Standard Operating Procedures for Storm Water Controls
- 2024 AK-CESCL training rosters
- 2023 Animal Facility Program evaluation report
- 2023 Snow Disposal Site evaluation report
- Anchorage Stormwater Manual
- Street Maintenance SOPs
- Storm Water Design Criteria Manual
- Little Campbell Creek Watershed Plan
- Chester Creek Watershed Plan
- DOT SWPPP Monthly Training Logs
- NOV for Titan LLC (2023)
- O'Malley Snow Site SWPPP
- DOT Street Sweeping Reports
- DOT Maintenance SOPs (2024)
- DOT Maintenance and Operations Training

**Please note that this is not an exhaustive list of permit documentation requirements.*

Closing Conference

DEC provided final updates and provided preliminary findings during the Term IV Semiannual APDES meeting on October 28, 2025. The inspector described the focus of the report and discussed follow-up procedures.

Section 4: Compliance

No violations were identified as part of this report.

Areas of Concern

Sheening events appeared to be occurring more frequently in 2025 at University Lake. There are concerns whether the OGS system currently in place may be overwhelmed by large events and contribute to these events. Repair efforts are already in motion, and monitoring efforts at this outlet are planned for 2026.

DEC confirmed with MOA that the 2025 sheening events were not reported to MOA’s hotline. Future events will be reported through this hotline in order to ensure all information is kept in a singular location.

Section 5: Appendixes

1. Photo Addendum
2. Violations Report (if applicable)

Signature

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X 

 Date: 12/8/2025

X *Sydney Bish*
 Date: 12/2/2025

Photo Addendum

Photo 01



Girdwood site visit, facing ditch

Photo 02



Girdwood site visit, facing wetland

Photo 03



Girdwood site visit, facing wetland

Photo 04



Girdwood Old Drainage culvert, facing inland

Photo Addendum

Photo 05



Minnows in wetland waters

Photo 06



Old Girdwood Drainage, facing Turnagain Arm

Photo 07



Complaint area, facing Girdwood housing

Photo 08



Complaint area, facing Turnagain Arm

Photo Addendum

Photo 09



Complaint area, water surface

Photo 10



Biogenic sheen

Photo 11



New culverts by Girdwood gas station

Photo 12



New culverts by Girdwood gas station

Photo Addendum

Photo 13



DOT Girdwood CGP Inspection

Photo 14



DOT Girdwood CGP Inspection

Photo 15



DOT CGP SWPPP sign

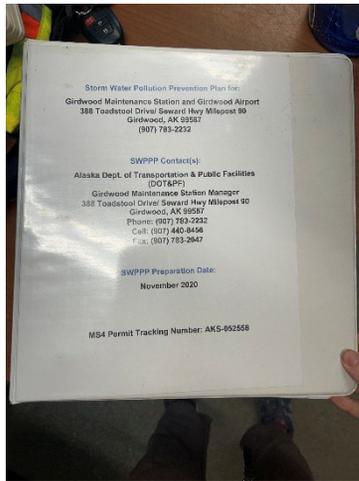
Photo 16



DOT CGP silt fence and stabilizing slopes

Photo Addendum

Photo 17



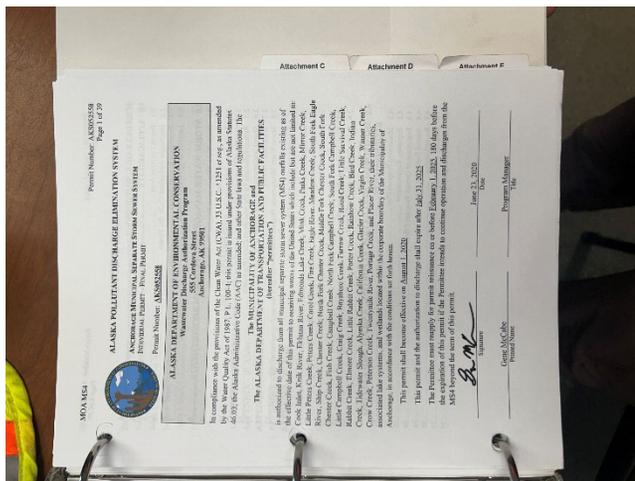
Glacier Maintenance Facility SWPPP

Photo 18



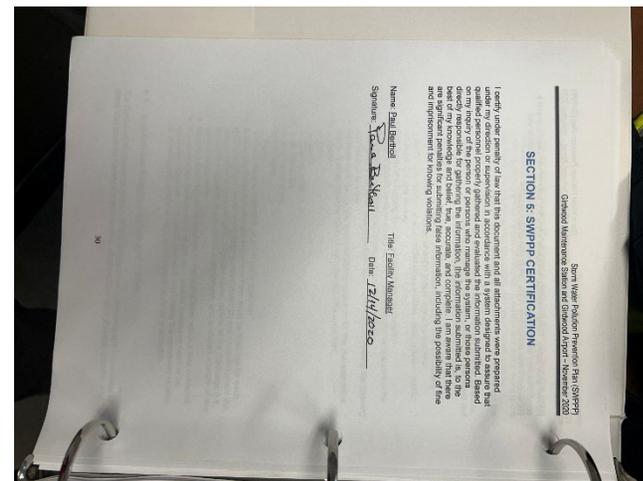
Glacier Maintenance Facility SWPPP Map

Photo 19



Copy of general permit

Photo 20



SWPPP certification

Photo Addendum

Photo 29



Oil and chemical storage

Photo 30



Equipment storage

Photo 31



Dumpsters and storage connexes

Photo 32



Facility roads

Photo Addendum

Photo 33



Explosive storage

Photo 34



Chemical storage

Photo 35



Empty drums

Photo 36



Vehicle maintenance shop

Photo Addendum

Photo 37



Equipment storage

Photo 38



Sand storage

Photo 39



Sand storage building (outside)

Photo 40



Outfall

Photo Addendum

Photo 41



Outfall

Photo 42



Fuel tank

Photo 43



Equipment storage, sand storage, salt storage buildings

Photo 44



Frontage Rd site visit

Photo Addendum

Photo 45



BMPs near Campbell Creek

Photo 46



BMPs near Campbell Creek

Photo 47



BMPs near Campbell Creek

Photo 48



BMPs near Campbell Creek

Photo Addendum

Photo 45



O'Malley Snow Site, Outfall A

Photo 46



O'Malley Snow Site, Outfall A

Photo 47



O'Malley Snow Site, Outfall A

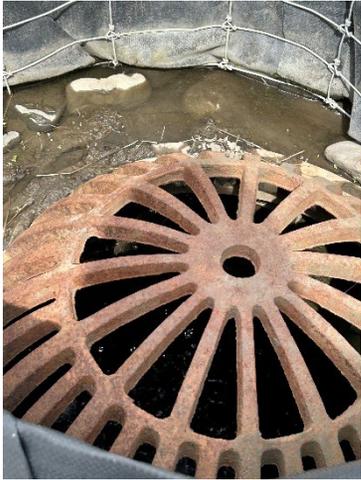
Photo 48



O'Malley Snow Site, Outfall A

Photo Addendum

Photo 45



O'Malley Snow Site, Outfall A

Photo 46



O'Malley Snow Site

Photo 47



O'Malley Snow Site

Photo 48



O'Malley Snow Site, Outfall B

Photo Addendum

Photo 45



O'Malley Snow Site, Outfall B

Photo 46



O'Malley Snow Site, Outfall B

Photo 47



O'Malley Snow Site

Photo 48



O'Malley Snow Site, remaining materials

Photo Addendum

Photo 45



University Lake, September 12, photo from SPAR

Photo 46



University Lake dewatering project turbid water, September 12

Photo 47



University Lake dewatering project, storm drain

Photo 48



University Lake, September 11, sheen

