



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917

<http://www.epa.gov/region8/stormwater>

STORMWATER ANNUAL REPORT FORM

This form is for regulated small MS4s (Municipal Separate Storm Sewer Systems) and may be used to meet the annual reporting requirements for regulated small MS4s as outlined in 40 CFR§122.34g(3). While it is not required for MS4 operators to use this form to meet federal regulations, MS4s are encouraged to use this format to allow for more efficient recordkeeping and to minimize paper consumption. This form may be submitted electronically provided that a signature is either scanned or provided as a hard copy addendum to the completed report form.

This form can be downloaded from the EPA Region 8 stormwater web site, <http://www.epa.gov/region8/stormwater>

Completed forms may be sent to:

Greg Davis
Mail code: 8P-W-WW
1595 Wynkoop Street
Denver, CO 80202-1129
Email: davis.gregory@epa.gov

A. Permittee Information

Permittee (Agency Name): Fort Carson
Mailing Address: 1626 Evans Street BLDG 1219
City, State and Zip Code: Fort Carson, Colorado 80913-4000
Contact Phone Number: 719-526-1697
Permit Certification Number: COR042001
Have any areas been added to the MS4 due to annexation or other legal means? NO

B. Reporting Period: January 1, 2014 to December 31, 2014

C. Construction Program Contact:

The following information will be provided on EPA's web site to assist construction site operators in determining municipality-specific requirements for their projects:

Have you assigned an appropriate contact person/work unit to address questions regarding your municipality's construction and post-construction requirements? YES

If Yes:

Contact name:

Position/work group title: Stormwater Program Manager, Environmental Compliance Branch

Contact phone number: 719-526-1697

Contact E-mail address: usarmy.carson.imcom-central.list.dpw-ed-storm-water@mail.mil

If a web site has been created with information on complying with your municipality's construction and/or post-construction requirements, list the address: <http://www.carson.army.mil/DPW/environmental/stormwater/index.html>

D. Implementation of EPA's Stormwater Management Program

The purpose of the annual report is to report on the status of your implementation of the permit requirements, including compliance with the standard of reducing the discharge of pollutants from your MS4 to the Maximum Extent Practicable (MEP). Address each of the following items for **each** of the six program areas:

1. Public education and outreach on stormwater impacts;
2. Public participation/involvement;
3. Illicit discharge detection and elimination;
4. Construction site stormwater runoff control;
5. Post-construction stormwater management in new development and redevelopment; and
6. Pollution prevention/good housekeeping for municipal operations

As the permittee, you must collect and maintain adequate information to demonstrate implementation of the six program areas as per your stormwater management program. Note that although the annual report only requires the submittal of certain information as outlined below, additional information may be requested by EPA to audit the implementation of your stormwater management program. For example, construction site inspection reports, outreach materials, and records of maintenance activities performed may be requested by EPA in addition to the annual report.

If another entity does not have its own permit but is instead covered under your permit, the annual report information under Section D of this form must also be provided for each such entity.

1. Public Education and Outreach on Stormwater Impacts

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to a BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for public education and outreach on stormwater impacts for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures	Changes proposed to BMP and/or Measurable Goal? (Yes/No) If yes, provide proposed changes and rationale.
Describe the methods, frequency, type, and target audience of stormwater outreach performed during the permit term.	<p>Many stormwater outreach activities were conducted in 2014 as seen in Attachment 1. Personnel that live and work on Fort Carson were targeted in this program.</p> <p>Twenty-seven (27) stormwater awareness brochures were distributed at events such as Environmental Permits 101, an outreach effort of the Fort Carson Directorate of Public Works (DPW) Environmental Compliance Branch, and the Front Range Environmental Manager’s Meeting, hosted by the Army Regional Environmental and Energy Office – West.</p> <p>Construction contractors and military and civilian engineers were targeted with the training, “Fort Carson Stormwater Management at Construction Sites”, which was delivered ten (10) times with seventy (70) people trained in 2014.</p> <p>Soldiers, civilians, and contractors were targeted with a stormwater awareness and training module in the Environmental Protection Officer (EPO) classes. This class was given eight (8) times in 2014 with a total of two hundred sixty-three (263) attendees.</p> <p>Fort Carson’s four elementary schools’ fourth and fifth graders participated in a stormwater awareness activity that included the opportunity to enter the “Name That Creek” contest. Fort Carson Middle Schools’ sixth graders participated in a hands-on stormwater activity (tree planting and trash collection at the wetland near the</p>	No. Proposal to send out survey on watershed/ stormwater awareness through the on-post community events communication and/or Balfour Beatty Housing communication channels.

	school), as well as the opportunity to participate in the contest.	
Provide a copy or representation of public outreach materials provided to the target audience(s).	See Attachment 2 for the Stormwater awareness brochure that is distributed to the target audience. The brochure was updated in 2014 to reflect the expanded developed area as well as the newly named Infantry Creek (formerly Central Un-named Ditch) at Fort Carson. Other educational material can be provided upon request.	No.
Provide copies of any educational materials, lesson plans, or presentations provided to school age students and other target audience(s) regarding stormwater runoff and water quality issues.	See Attachment 3 for an example of the educational material for the EPO course. Other material is available upon request.	Yes. An Earth Day Project with a local Elementary school is proposed for 2015; 4 th and 5 th grade student will re-vegetate an eroded ditch near their school. Also, a LID BMP maintenance training program will be presented to Fort Carson DPW maintenance contractors.
Estimate the number of people expected to be reached by the program over each year of the permit term.	An estimated 1,258 people were reached directly by the Stormwater Program in 2014 as calculated on Attachment 1. Another 10,000 (estimated) were reached via indirect means (newspaper articles, website, etc.) A web counter has been installed on the public website.	No.
Provide the name or title of the person(s) responsible for coordination and implementation of the stormwater public education and outreach program.	Title: Stormwater Specialist	No.

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

An article outlining the educational activities that took place during Earth Day 2014 was published in May 2014. At the Front Range Environmental Managers Meeting held June 17, 2014, the Stormwater Program at Fort Carson presented information regarding MS4 Lessons Learned on Fort Carson. Twenty two managers from a variety of service installations attended this meeting hosted by the Army Regional Environmental and Energy Office - West.

2. Public Participation/Involvement

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for public participation and involvement on stormwater impacts for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
Document any events or other activities to clean up MS4 receiving waters.	"Make A Difference Day", a national day of volunteering, was held on Oct. 25, 2014. Approximately 50 volunteers signed on to clean out trash and debris in B-Ditch; others cleared debris in Infantry Creek. A post-wide Fall Clean-up was conducted concurrently; military units policed all areas in their control.	No.
Document any volunteer activities conducted to help actively engage residents and personnel at Fort Carson in understanding water resources and how their activities can affect water quality.	Fort Carson had a ditch clean up event staffed by volunteers. "Make A Difference Day" was an event used to work with about 50 volunteers to clean out trash and debris in B-Ditch. A "Name the Ditch" essay contest was held, and participants were directed to the public website for information. Public participation events are recorded in Attachment 1.	No.
Provide the name or title of the person(s) responsible for coordination and implementation of the storm water public education and outreach program.	Title: Stormwater Specialist	No.

Public participation/involvement (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

At the annual Make A Difference Day volunteer event, 50 community members cleaned waterways and ditches on Fort Carson. All annual reports are available at Building 1219. The storm drain stenciling program is executed by the Stormwater Specialist as well as on a volunteer basis. A current status is available upon request.

3. Illicit Discharge Detection and Elimination

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for illicit discharge detection and elimination for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
Describe the program used to detect and eliminate illicit discharges into the MS4, including procedures for detection, identification of sources, and removal of non-stormwater discharges from the storm sewer system.	Stormwater Program team members, the Environmental Compliance Assessment Team (ECAT), and EPOs are all trained to detect and identify illicit discharges to the storm sewer system. Once identified, personnel follow the Spill Prevention Control and Countermeasures Plan (SPCCP) and the DPW Spill Response Team's (DPW-SRT) Standard Operating Procedure to stop the release and initiate clean-up. The Operations and Maintenance division of Fort Carson's DPW can assist in the removal of other non-hazardous discharges. If clean-up efforts are beyond their capability Fort Carson has the ability to obtain an emergency contract with private entities to complete the clean-up in a timely manner.	No.
Describe the location and method of dry weather screening performed.	A dry weather illicit discharge survey was conducted in the third quarter of 2014. Four watersheds are surveyed; B-Ditch, Clover Ditch (I-ditch), Infantry Creek (formerly Central Un-named Ditch) and Rock Creek.	No.
Describe illicit discharges located and all actions taken to eliminate sources of illicit discharges.	The dry weather illicit discharge survey was conducted in the third quarter 2014. A copy of this survey can be provided upon request. Also, discharges are reported through the Stormwater Program website, the emergency spill reporting phone number, and contact information is	No.

	<p>distributed during education and outreach events. The Stormwater Program encourages illicit discharge reporting through these avenues.</p> <p>Most discharges are responded to immediately. Trash, however, is taken care of during ditch clean up events and through service orders via the DPW Operations and Maintenance division. Completed work is tracked in an excel spreadsheet.</p>	
Describe training materials used and the frequency at which training was provided to the target audience(s) on how to respond to reports of illicit discharges.	This is met through the outreach and education tasks. See Minimum Control Measure 1 (MCM) for frequency information.	No.
Describe or cite the established ordinance or other regulatory mechanism used to prohibit illicit discharges into the MS4.	<p>See Attachment 4, the Garrison Commander Policy.</p> <p>Balfour Beatty (Fort Carson's housing management partner) has language in all rental agreements that prohibit illicit discharges.</p>	No.
Provide a copy or excerpt from the information management system used to track illicit discharges.	See Attachment 5. All of the data on this form is entered into a database and marked on a map. The data can be exported and analyzed.	No.
Describe the categories of non-stormwater discharges evaluated as potentially being significant contributors of pollutants to the MS4 and any local controls placed on these discharges.	Sanitary Sewer Overflows (SSO) have the potential to significantly affect the MS4. Current projects to assist in minimizing this impact are sanitary sewer upgrades that are occurring throughout the installation. This is also addressed with MCM I and II.	No.
Describe occasional incidental non-stormwater discharges (See Part 2.4.6) and any controls placed on these discharges.	<p>The list of allowable non-stormwater discharges is presented in the SWMP, and is available on a public website. Information is provided to residents during education and outreach activities on how to coordinate any events that may incur a discharge, such as a charity car washes.</p> <p>Everyone on Post is encouraged to wash their cars at one of the two car washes available.</p> <p>There have been a few outside cooking events, and one known groundwater dewatering instance at a construction site. Dewatering guidance is given out during SWPPP reviews for construction.</p>	No.

<p>Describe hazardous waste collection events and summary data which generally covers what was collected.</p>	<p>Household hazardous waste (HHW) is accepted by the El Paso County Household Hazardous Waste Facility. Education activities documented earlier in the education and outreach section provides information to residents on this opportunity.</p> <p>A collection event was held on April 22, 2014. A total of 15,632 pounds of waste was diverted from a landfill. The following is a breakdown of what was collected: -Electronics: 5,385 pounds -Latex paint: 5,917 pounds -Used motor oil: 854 pounds</p> <p>An article on this event was published in Fort Carson’s newspaper, The Mountaineer. During Fort Carson’s Pollution Prevention Day (September 16, 2014), an additional four hour collection event was held in partnership with El Paso County. Due to the site for the drop-off location, a scale could not be utilized. According to the DPW Pollution Prevention coordinator, about 75 people dropped off various types and amounts of hazardous waste.</p> <p>Please refer to Attachment 8 for further details.</p> <p>The disposal of hazardous waste generated from training activities is coordinated through the Hazardous Waste Storage Facility (HWSF) on-post. Turning in waste to the HWSF requires training to ensure all their requirements are met. Records of waste are maintained on a daily basis, and are kept at the HWSF.</p>	<p>No.</p>
<p>Maintain an inventory of industrial facilities that discharge into the MS4 or to waters of the United States within Fort Carson. The types of industrial activities that must be inventoried are set forth in 40 CFR §122.26(b)(14)(i) through (xi). This inventory must include the location of the activity, the location of its outfall and corresponding receiving water, and the NPDES permit status for its stormwater discharge.</p>	<p>Industrial discharges at Fort Carson are regulated under the Multi Sector General Permit. Through the requirements of this permit, industrial activities are tracked in a spreadsheet that includes a reference to the Stormwater Pollution Prevention Plan for the site (including location of the activity, location of the outfall and corresponding receiving water, as well as permitting information), exposed materials, monitoring requirements, and comments on the facility.</p>	<p>No.</p>

Illicit Discharge Detection and Elimination (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

All spill reports are kept on the Stormwater Program SharePoint site. Spill Reports have been analyzed and no trends can be identified.

When a spill does occur it is immediately reported to Fire Department, and the DPW-SRT then assists in clean up and ensure the site meets environmental standards. The nature of activities at Fort Carson elevates the risk of spills but staff is highly trained on spill response and clean up.

The storm sewer map is kept updated by the Fort Carson DPW Geographic Information System (GIS) team. A hard copy map is on the wall of the Stormwater Program Office.

Regarding flushing and sanitizing new water mains and building plumbing; Contractors are required to discharge these effluents to nearby sanitary or industrial sewers, or to truck the effluents to the installation wastewater treatment plant. De-chlorination of chlorinated effluent is required prior to discharge.

4. Construction Site Stormwater Runoff Control

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for construction site stormwater runoff control for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
Describe “regulated construction activities” that occurred during the term of this permit.	There were 57 active construction sites in 2014, varying in size, location, and activity. These projects included the construction of large facilities, linear utilities and residential improvements and developments. These projects are owned and managed by USACE, DPW, Balfour Beatty housing communities, and AAFES. These individuals are also responsible for ensuring their construction contractors are meeting permit requirements. At a minimum, quarterly inspections were done on all active projects over an acre that did not receive a Low Erosivity Waiver in 2014. The Stormwater Program includes BMP requirements for smaller projects via the NEPA process.	No.
Describe or cite the established ordinance or other regulatory mechanism used to require erosion and sediment controls.	See Attachment 4, the Garrison Commander Policy.	No.

<p>Describe the sanctions and enforcement mechanisms used to ensure that all “regulated construction activities” are in compliance with the terms of the Construction General Permit. This should include a description of any methods developed to stop work on construction sites in non-compliance independent of contracting procedures.</p>	<p>See Attachment 4, the Garrison Commander Policy. Also, the USACE actively supports the Stormwater Program by withholding money from contractors who fall out of compliance with the Construction General Permit.</p>	<p>No.</p>
<p>Describe the procedures for site plan review, including the review of pre-construction site plans, which incorporate consideration of potential water quality impacts and applicable contract language.</p>	<p>Every project goes through a NEPA review of which basic information on MS4 requirements and CGP requirements is given, and potential water quality impacts are assessed. The Stormwater Team attends design review meeting for large projects to ensure water quality is addressed. In addition, a SWPPP review is conducted before the site is allowed to file its NOI for Construction General Permit coverage.</p>	<p>No.</p>
<p>Describe the procedures for receipt and consideration of information submitted by the public.</p>	<p>The Stormwater Program contact information is distributed to the public via the Stormwater Program website, brochures (see Attachment 1 for distribution intensity), during trainings, and presentations at community events (see Attachment 1 for events attended). The public is encouraged to call the spill line and / or e-mail the Stormwater Program. Public comments are immediately considered and acted upon when appropriate.</p>	<p>No.</p>
<p>Describe the procedures for site inspection, including how sites will be prioritized for inspection, including documentation of the frequency of site inspections and methods for prioritizing site inspections.</p>	<p>All construction sites covered under the Construction General Permit are inspected quarterly by a member of the Stormwater team. If an inspection is not to the satisfaction of the Stormwater Team member, more frequent follow up inspections are scheduled. Inspection reports are located in their respective project files and available upon request.</p>	<p>No.</p>

Provide the name or title of the person(s) responsible for coordination and implementation of the construction site runoff control program.	Title: Stormwater Program Manager	No.
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Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

All construction projects are reviewed by a team of natural resources and environmental specialists during the NEPA project review process. If there is an issue or concern, it is addressed at that point. Basic information on MS4 requirements and compliance and CGP requirements are given at this time. In addition, a SWPPP review is conducted before the site is allowed to file its NOI for Construction General Permit coverage. All NEPA reviews are available upon request.

All construction related requirements and CGP compliance information has successfully been integrated into all RFPs. These RFPs include those sent out by USACE, DPW, AAFES, and Balfour Beatty housing communities.

Construction sites are required to have a dewatering plan in place prior to the start of construction. A review of this plan is conducted during the SWPPP review process. Additionally, construction contractors who must dewater a site are required to dewater on site using approved methods and are prohibited from discharging to storm sewers or ditches. We have created a guidance document and it is available on request.

Coordination between the Stormwater Program, USACE, DPW and other entities performing or observing construction activities is conducted on a regular basis. These include monthly and weekly scheduling meetings and design reviews. A monthly Stormwater Management at Construction Site Training which is described in Section 1 (MCM1) is available to all entities involved in construction. Construction Representatives and ECAT personnel bring any observed issues to the attention of the Stormwater Program, and the Fort Carson Stormwater Program personnel conduct frequent drive by inspections.

All construction sites are inspected for permit compliance by the Fort Carson Stormwater Program before the Notice of Termination (NOT) can be filed. The NOT inspection form is provided in the SWMP. Fort Carson DPW Environmental has additional personnel who are available to provide seeding, mulching and vegetation recommendations if conditions have not been met. DPW GIS maintains all As-builts of facilities on Microstation software.

5. Post-construction Stormwater Management in New Development and Redevelopment

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for post-construction stormwater management in new development and redevelopment for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
Describe the program that ensures the pre-development hydrology is met for new development and re-development projects as required in Part 2.6.1 and the mechanism used to review the adequacy of post-construction BMPs.	<p>The site plan review process described in Section 4 of this report allows for a Stormwater Program review of projects and ensures pre-development hydrology requirements are met and post-construction BMPs are adequate. The Excess Urban Runoff Volume (EURV) calculations are used in designing post-construction, permanent BMPs to meet the requirements of EISA Section 438. Refer to the Fort Carson SWMP for information. Additionally, contract language adequately addresses these requirements. All NEPA reviews are available upon request.</p> <p>The Stormwater Program Manager was an active participant in the development of the Colorado Springs Urban Drainage Criteria Manual. This Manual was finalized in early 2014 and will be the guidance used to model and design Post Construction BMPs.</p> <p>The document can be found at: http://www.springsgov.com/Page.aspx?NavID=4794</p>	No.
Describe the ordinance or other regulatory ordinance used to require the installation and maintenance of post-construction stormwater controls.	See Attachment 4, Garrison Commander's Policy #17.	No.

<p>Describe the program that ensures the long-term operation and maintenance of post-construction BMPs, including an excerpt from any data management system that includes maintenance requirements and schedules for post-construction BMPs installed during the year.</p>	<p>Fort Carson Operations and Maintenance (O & M) Contractor does not have a contract requirement for a data management system currently but this is being investigated. The Stormwater Program performs annual inspections and maintains a database of the BMPs. The Contractor performs the repairs at this point and we are working on updates to the contract related to maintenance of Post Construction BMPs. See Attachments 10 and 11.</p>	<p>No.</p>
<p>Describe the process used to ensure that all DPW, Military Construction, and downrange contracts initiated after the effective date of the permit contain language which requires the installation of post-construction stormwater controls and an excerpt of applicable contract language.</p>	<p>The post-construction BMPs are required because of the EISA Section 438 in addition to this MS4 permit. This is incorporated in the Fort Carson SWMP and also in contract language that states, The Excess Urban Runoff Volume (EURV) calculations are used in designing post-construction, permanent BMPs to meet the requirements of EISA 438. Refer to the Fort Carson SWMP for information. Additionally, contract language adequately addresses these requirements. All NEPA reviews are available upon request.</p>	<p>No.</p>
<p>Provide the name or title of the person(s) responsible for coordination and implementation of the post-construction stormwater management program.</p>	<p>Title: Stormwater Program Manager</p>	<p>No.</p>

Post-construction Stormwater Management in New Development and Redevelopment (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

In 2014, any project completed which impacted stormwater was reviewed during the NEPA process; these reviews are available upon request. Verification of each project meeting all CWA, NPDES and EISA Section 438 requirements is done during the NEPA reviews and is a partnership with numerous programs.

The Notice of Termination (NOT) Inspection checklist is in use. Construction reviews/inspections are conducted during all phases of construction. Compliance for permanent stabilization and Post Construction BMP functionality is also achieved through the NOT inspection process. This document is available if requested. The landscaping, permanent stabilization, and post construction BMPs of each construction project are inspected for proper functionality before the NOT can be filed with the EPA. All As-builts and O & M specifications are given to the Fort Carson DPW Geographic Information System (GIS) team. As-builts turn-in was also verified in 2014 by the Stormwater Specialist.

Maintenance of Post Construction BMPs is being secured and funded under the DPW Operations and Maintenance contract. Negotiations are underway with the Fort Carson Housing contractor, Balfour Beatty, to ensure a regular maintenance program for the Post Construction BMPs on property leased by Balfour Beatty. The Stormwater Program will provide training and support for these projects.

There is a large amount of construction at Butts Army Airfield for the new Combat Aviation Brigade (CAB), considerable time has been devoted to planning and providing sufficient input into the design of new building, utilities and other facilities. Stormwater in this area will be managed with an existing reservoir due to prohibitions for having standing water near the airfield to mitigate the potential for bird strikes.

The Stormwater Program also participates in Fort Carson's sustainability initiatives. We are working towards Net Zero goals for sustainable development and have provided technical support to the team working on implementation of this initiative. The Stormwater Program provided comments on the Fort Carson Installation Design Guide to include guidance for landscaping, seeding, stabilization and Low Impact Development.

6. Pollution Prevention/Good Housekeeping for Municipal Operations

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for pollution prevention/good housekeeping for municipal operations for the reporting period; including dates and numeric measures:

<p>Measurable Goal(s) Including dates and numeric measures, as previously submitted</p>	<p>Status: Including dates and numeric measures</p>	<p>Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.</p>
<p>Describe the operation and maintenance program intended to prevent or reduce pollutant runoff from municipal operations, including a list of each of the activities evaluated under this program and a description of the controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, snow disposal areas, and salt/sand storage locations.</p>	<p>This is a cooperative effort with the Stormwater Program, and Operations Division of DPW.</p> <p>Currently primary streets are swept monthly; secondary streets are swept every two months. Parking lots are swept two times a year.</p> <p>Snow removal and deicing is performed on a case by case basis. Street sweeping is conducted within 48 hours of deicing and snow removal activities.</p> <p>In 2014, one hundred and seventy five (175) service orders for stormwater infrastructure-related maintenance or repair were completed (see Attachment 9). Of these, twenty eight (28) were for culvert cleaning, repair, or replacement. Thirty two (32) service orders accomplished the cleaning of drop or curb inlets. Fifty five (55) service orders were for the maintenance of ditches. The remaining service orders were placed and completed for miscellaneous bridge and road repairs, the installation of erosion controls, and emergency repairs after major rainfall events.</p>	<p>No.</p>

	<p>Please refer to attachment 9 for further information on the above outlined efforts.</p> <p>Bioretention and detention areas were assessed in 2014 and the Operation and Maintenance division will conduct required maintenance in 2015; high priority maintenance will be completed first. The language regarding maintenance of these structures will also be added to the O&M contractor's contract. Please refer to attachment 10 and 11 for further information.</p> <p>Additionally, the industrial maintenance and storage yards, waste transfer stations, and maintenance shops are permitted under the MSGP. This program includes training, inspections and monitoring at these sites. Results from inspections and monitoring events are used to prescribe future BMPs and good housekeeping efforts. Inspection results are available upon request.</p>	
<p>Describe the contents and frequency of the training program for municipal personnel and a list of the personnel or positions trained during the term of the permit.</p>	<p>The O&M contractor is responsible for hiring qualified staff to perform maintenance activities.</p> <p>EPO training is provided regularly on Fort Carson (ten times per year). Various courses presented during the EPO training emphasize stormwater pollution prevention, to include "Pollution Prevention", "Recycling at Fort Carson", "Spill Response", "Hazardous Waste Training", "UST/AST Program", "Environmental Performance Assessment System" and "Environmental Inspections". See Attachment 3 for the slides from the stormwater module.</p> <p>Personnel attend the training mentioned above. The list of trainees is extensive and available upon request.</p> <p>In addition, stormwater pollution prevention is covered in more detail in</p>	<p>No.</p>

	<p>the “Stormwater” portion of the EPO course. The monthly stormwater management at construction sites course is open to any employees and contractors as well.</p>	
<p>Describe the evaluation performed on the street cleaning operations, catch basin cleaning operations, and street sanding/salt practices and any measures taken as a result of the evaluation to minimize negative impacts to water quality.</p>	<p>Please refer to attachment 9 for these activities.</p> <p>The MS4 water quality sampling efforts show that no parameters were in exceeded as related to O&M operations. Please refer to attachment 6 for this information.</p>	<p>No.</p>

Pollution Prevention/Good Housekeeping for Municipal Operations (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

The DPW O&M Division contractor is required to be trained to properly handle applications of liquid and granular deicing and equipment operation.

The ECAT currently assesses any impacts to stormwater during their required monthly inspections and assists the stormwater program in corrective actions during the assessment of facilities. Stormwater language was permanently integrated into the ECAT inspection process in 2011. Many of these requirements are also met by activities conducted for MSGP compliance. Temporary BMPs are always used during maintenance, and training and inspections are conducted often.

Covering of material in storage areas presents a challenge due to cost and accessibility issues. Temporary stormwater BMPs, good housekeeping measures and inspections are employed to mitigate any potential pollutants from entering the storm sewer system. Granular deicing product is always stored in a covered environment. Liquid deicing agent is stored according to manufacturer's specifications along with Stormwater Best Management Practices.

E. Results of Information Collected and Analyzed.*

If you have collected and/or analyzed information during the reporting period, including any monitoring data used to assess the success of the program at reducing the discharge of pollutants, submit a short summary of the information and any analysis completed.

Summary

Surface water sampling required by the SWMP was contracted and completed in 2014. This sampling evaluates the 4 major cantonment drainages (B-Ditch, Clover Ditch, Infantry Creek (formerly Central Un-Named Ditch), and Rock Creek). The sampling effort detected *E. coli* and selenium in some areas. Attachment 7 provides the results of prior year sampling events. Continued monitoring is planned for 2015 as per requirements of the MS4 permit. Attachment 6 includes the full surface water sampling report for 2014. As part of the new MS4 permit issuance in 2015, we will propose a reduction in monitoring due to historical sampling data. The basis for this request is that collected data has shown minimal constituents of concerns.

Fort Carson also samples four locations for compliance under the MSGP. That data is also available upon request.

*Data collected to audit the implementation status of a program element does not need to be reported in the annual report unless required by an established measurable goal or as a requirement or result of an inspection or enforcement action. For example, data such as street miles swept, visitors at an information booth, or visits to a web site do not need to be included in the annual report unless directly related to a measurable goal or committed to be reported and/or analyzed in a program description.

F. Summary of Inspections and Enforcement Actions.

Provide a summary of the number and nature of inspections and formal enforcement actions performed. Site-specific information may also be included, but is not required.

Program Area	Description of Enforcement Actions/ Inspections
Construction Site Stormwater Runoff Control	<p>Fort Carson inspected approximately 57 major construction sites during 2014. These inspections included documentation review and a thorough site walk-through.</p> <p>Enforcement actions included verbal warnings with follow up inspections from the stormwater inspector, verbal warnings from the Compliance Branch Chief on more difficult sites, and finally verbal and written warnings to the contracting officer from the Director, DPW. Enforcement actions similar to the above, and including withholding of payment, were issued by USACE representatives.</p> <p>Additionally, the Stormwater Management at Construction Sites Trainings has been extremely successful. Approximately 70 Contractors, Soldiers in the 52nd Engineer Battalion, USACE construction representatives, and DPW Engineering and Environmental personnel have attended.</p> <p>The new MS4 permit was not issued in 2014; the 2009 permit was administratively extended, and the new permit will be issued in 2015. The Stormwater Program is supplying comments and will conduct a review when the draft is received.</p>
Industrial Sites Permitted Under MSGP	<p>Industrial sites permitted under the MSGP were inspected comprehensively (annually) and routinely (quarterly). Industrial sites (mostly motor pools) were visually inspected as per MSGP requirements. Analytical samples were collected at one of the four sites as required under the MSGP alternate year monitoring schedule. Newly constructed sites were incorporated into the program. ECAT inspections of these sites also occur once a month. Enforcement actions through ECAT are reported and logged internally, and involve follow up actions and inspections. Reports and inspection records are available upon request.</p>

G. Proposed Changes to the Stormwater Management Program.

Provide a narrative description of any changes or additions to the stormwater management program.

A new permit will be issued in 2015. Proposed changes include a reduction in required sampling, less prescriptive language on stormdrain stenciling and a reduction in requirements that are outside of our control.

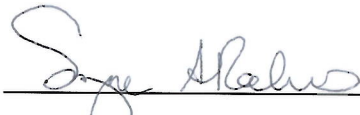
H. Notice of Program Element Operation by a Second Party.

Another government entity may be relied on to perform requirements of your MS4 permit. However, as the permittee, you remain liable for compliance with the terms of the permit if the requirements are not fulfilled. You must complete this annual report for the geographic areas covered under your permit, for all program areas, even if one or more program elements/areas is being performed by another entity. (However, if you are performing a program element for another permittee, you do not need to include that activity in this report.) If you are relying on another government entity to satisfy some of your permit obligations (and if the information has not been previously provided to the EPA in earlier reports or the application), the annual report must include a statement to that effect. If the BMP and/or measurable goal will be modified in addition to the change of operator to another government entity, the change must be included in Item G, above. Example statement: "As of September 15, 2003, Monroe County is performing the construction site plan reviews for the Nixon Air Force Base in accordance with the procedures in the Base's original application."

N/A

I. Certification.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

	3/12/15
Signature of Permittee (legally responsible person)**	Date Signed

Suzanne A. Rohrs

DPW Stormwater Program Manager

Name (printed)

Title

**This report may be signed by a duly authorized representative of the permittee in conjunction with the signatory requirements for NPDES permitting provided at 40 CFR §122.22(b).