



**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**PIEDMONT REGIONAL OFFICE**

Matthew J. Strickler  
Secretary of Natural Resources

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David K. Paylor  
Director

James J. Golden  
Regional Director

**STATE WATER CONTROL BOARD**  
**ENFORCEMENT ACTION - ORDER BY CONSENT**  
**ISSUED TO**

**United States General Services Administration**  
**M.A. Mortenson Co.**  
**Hensel Phelps Construction Co.**  
**(Foreign Affairs Security Training Center)**  
**Virginia Water Resources and Wetlands**  
**Protection Program Permit No. WP15-1145**

**SECTION A: Purpose**

This is a Consent Order issued under the authority of Va. Code § 62.1-44.15, between the State Water Control Board and United States General Services Administration (hereinafter referred to as "GSA"), M.A. Mortenson Co. ("Mortenson") and Hensel Phelps Parent 1 Inc., d/b/a Hensel Phelps Construction Co. ("HPC") regarding the Foreign Affairs Security Training Center development at Ft. Pickett in Nottoway County, Virginia (hereinafter referred to as the "Property" or "Facility"), for the purpose of resolving certain violations of the State Water Control Law and applicable permit requirements and/or regulations. Where appropriate, GSA, Mortenson and HPC are sometimes referred to collectively herein as the "Responsible Parties."

**SECTION B: Definitions**

Unless the context clearly indicates otherwise, the following words and terms have the meaning assigned to them below:

1. "Board" means the State Water Control Board, a permanent citizens' board of the Commonwealth of Virginia, as described in Va. Code §§ 10.1-1184 and 62.1-44.7.

2. "Construction Activity" means any clearing, grading or excavating resulting in land disturbance of equal to or great than one acre, or disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or great than one acre.
3. "Department" or "DEQ" means the Department of Environmental Quality, an agency of the Commonwealth of Virginia, as described in Va. Code § 10.1-1183.
4. "Director" means the Director of the Department of Environmental Quality, as described in Va. Code § 10.1-1185.
5. "Discharge" means, when used without qualification, a discharge of a pollutant, or any addition of a pollutant or combination of pollutants, to state waters or waters of the contiguous zone or ocean other than a discharge from a vessel or other floating craft when being used as a means of transportation.
6. "Fill material" means any pollutant that replaces portions of surface water with dry land or that raises the bottom elevation of a surface water for any purpose.
7. "Hensel Phelps Parent 1 Inc. d/b/a/ Hensel Phelps Construction Co." or "HPC" is a foreign corporation with its principle office in Greeley, CO. HPC is authorized to do business in the Commonwealth of Virginia, including its members, affiliates, partners and subsidiaries. HPC is a "person" within the meaning of Va. Code § 62.1-44.3.
8. "Impacts" means results caused by those activities specified in §62.1-44.15:20A of the Code of Virginia.
9. "M.A. Mortenson Company" or "Mortenson" is a foreign corporation with its principle office in Minneapolis, MN. Mortenson is authorized to do business in the Commonwealth of Virginia, including its members, affiliates, partners and subsidiaries. Mortenson is a "person" within the meaning of Va. Code § 62.1-44.3.
10. "Notice of Violation" or "NOV" means a type of Notice of Alleged Violation under Va. Code § 62.1-44.15.
11. "Order" means this document, also known as a "Consent Order" or "Order by Consent," a type of Special Order under the State Water Control Law.
12. "Permit" or "Virginia Water Protection Permit" means an individual or general permit issued under Va. Code § 62.1-44.15:20 that authorizes activities otherwise unlawful under Va. Code § 62.1-44.5 or otherwise serves as the Commonwealth's certification under § 401 of the federal Clean Water Act (33 United States Code ("USC") § 1344.
13. "Pollutant" means any substance, radioactive material, or heat which causes or contributes to, or may cause or contribute to pollution. 9 VAC 25-210-10.

14. "Pollution" means such alteration of the physical, chemical or biological properties of any state waters as will or is likely to create a nuisance or render such waters: (i) harmful or detrimental or injurious to the public health, safety or welfare, or to the health of animals, fish or aquatic life; (ii) unsuitable with reasonable treatment for use as present or possible future sources of public water supply; or (iii) unsuitable for recreational, commercial, industrial, agricultural, or other reasonable uses; provided that (a) an alteration of the physical, chemical, or biological property of state waters, or a discharge or deposit of sewage, industrial wastes or other wastes to state waters by any owner which by itself is not sufficient to cause pollution, but which, in combination with such alteration of or discharge or deposit to state waters by other owners is sufficient to cause pollution; (b) the discharge of untreated sewage by any owner into state waters; and (c) contributing to the contravention of standards of water quality duly established by the board, are "pollution." Va. Code § 62.1-44.3; 9 VAC 25-210-10.
15. "Property" or "Parcel" means the Foreign Affairs Security Training Center at Ft. Pickett in Nottoway County, Virginia.
16. "PRO" means the Piedmont Regional Office of DEQ, located in Glen Allen, Virginia.
17. "Regulations" means the Virginia Water Protection Permit Program Regulations, 9 VAC 25-210 *et seq.*
18. "Restoration" means the reestablishment of a wetland or other aquatic resource in an area where it previously existed. Wetland restoration means the reestablishment of wetland hydrology and vegetation in an area where a wetland previously existed. Stream restoration means the process of converting an unstable, altered, or degraded stream corridor, including adjacent areas and floodplains, to its natural condition.
19. "State Water Control Law" means Chapter 3.1 (§ 62.1-44.2 *et seq.*) of Title 62.1 of the Va. Code. Article 2.2 (Va. Code §§ 62.1-44.15:20 through 62.1-44.15:23) of the State Water Control Law addresses the Virginia Water Resources and Wetlands Protection Program.
20. "State waters" means all water, on the surface and under the ground, wholly or partially within or bordering the Commonwealth or within its jurisdiction, including wetlands. Va. Code § 62.1-44.3 and 9 VAC 25-210-10.
21. "Surface water" means all state waters that are not ground waters as defined in Va. Code § 62.1-255.
22. "United States General Services Administration" or "GSA" is an independent agency organized under the government of the United States. GSA is a "person" within the meaning of Va. Code § 62.1-44.3.
23. "Va. Code" means the Code of Virginia (1950), as amended.

24. "VAC" means the Virginia Administrative Code.
25. "Wetlands" means those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas. 9 VAC 25-210-10.

### **SECTION C: Findings of Fact and Conclusions of Law**

1. GSA owns and operates a development at the Property at Ft. Pickett in Nottoway County, Virginia. The project is covered by VWP Individual Permit No. 15-1145, effective February 22, 2016, authorizing permanent impacts to 3.84 acres of palustrine forested wetland ("PFO") and 2,859 linear feet ("LF") of streambed. GSA employs Mortenson and HPC as contract operators to develop the Property. HPC and Mortenson are unrelated unaffiliated independent contractors to GSA with separate areas of responsibility on the Property.
2. DEQ staff conducted a series of inspections at the Property on October 10, 2018, November 8, 2018, December 4, 2018, June 11, 20, & 27, 2018, July 9 & 13, 2018, December 4, 2019, January 23, 2019, May 7, 2019 and June 12, 2019. DEQ staff inspected the Property for compliance with the requirements of the State Water Control Law and Regulations, and Permit requirements.
3. The observations from DEQ inspections are documented in the table and map included in the Inspection Summary provided as Appendix B. Appendix B delineates the impact locations and corrective actions taken or to be undertaken by GSA through either HPC or Mortenson. Items identified in green are located in areas where HPC has responsibility, and items identified in white are located in areas where Mortenson has responsibility.
4. DEQ staff observed the discharge of fill material in the form of sediment that resulted in impacts to 11,594 LF of stream channel, 4.95 acres of PFO, and 0.01 acres of palustrine emergent wetland. The impacts are the result of the accumulation of 1-18 inches of eroded sediment deposited to various stream channels present throughout the Property. The deposition resulted from the failure to install and maintain erosion and sediment control measures during construction. The impacts were not authorized by the Permit.  
  
Va. Code § 62.1-44.15:20(A) and 9 VAC 25-210-50(A) prohibit alteration of the physical, chemical or biological properties of state waters and make them detrimental to public health, animal or aquatic life, without a Permit.
5. DEQ staff observed erosion and sediment control measures were not installed or maintained in good working order, resulting in sediment impacts to surface waters.

Part I.C.13 of Individual Permit 15-1145 states: "Erosion and sedimentation controls shall be designed in accordance with the Virginia Erosion and Sediment Control Handbook, Third Edition, 1992, or for mining activities covered by this general permit, the standards issued by the Virginia Department of Mines, Minerals and Energy that are as effective as those in the Virginia Erosion and Sediment Control Handbook, Third Edition, 1992. These controls shall be placed prior to clearing and grading and maintained in good working order to minimize impacts to state waters. These controls shall remain in place until the area is stabilized and shall then be removed."

6. DEQ staff observed riprap installed as outlet protect in stream channels adjacent to Impact Areas 7 and 27 was disruptive to aquatic life movement through the stream channel and impeding passage of normal or expected high flows.

Part I.C.2 of Individual Permit 15-1145 states: "No activity may substantially disrupt the movement of aquatic life indigenous to the water body, including those species which normally migrate through the area, unless the primary purpose of the activity is to impound water."

Part I.C.6 of Individual Permit 15-1145 states: "The activity shall not impede the passage of normal or expected high flows, and any associated structure shall withstand expected high flows."

7. DEQ staff observed that required boundary flagging to mark non-impacted surface waters within 50 feet of permitted activities or within the project or right-of-way-limits was missing in some areas and damaged in other areas.

Part I.C.25 of Individual Permit 15-1145 states: "All non-impacted wetlands, streams, and designated upland buffers that are within the project or right-of-way limits, and that are within fifty feet of any project activities, shall be clearly flagged or demarcated for the life of the construction activity within that area. All non-impacted open water areas within the project or right-of-way limits, and that are within fifty feet of any project activities, shall be clearly flagged or demarcated, as practicable, for the life of the construction activity within that area. The permittee shall notify all contractors and subcontractors that no activities are to occur in these marked areas."

8. On August 13, 2018, NOV No. 1807-000788 was issued to GSA, providing notice of the observations documented in the July 25, 2018 consolidated inspection report, and as described in Section C herein.
9. DEQ staff and the Responsible Parties communicated regularly to monitor corrective action at the Property. Additional compliance visits were conducted by DEQ and GSA staff on October 10, 2018, April 26, 2019, May 7, 2019 and June 12, 2019 to specifically discuss the NOV, progress toward compliance, and enforcement. GSA initiated an independent evaluation of site compliance, providing regular reporting beginning in October 2018. Staff determined that sufficient corrective action was taken to warrant no further action for the violations described in Paragraph C (3) – (5). Violations described

in Paragraph C (2) require further corrective action and are addressed in the Schedule of Compliance attached to this Order as Appendices A and B. DEQ acknowledges that Responsible Parties have completed or are near completion of the required remediation and restoration activities.

10. Affected waters include an un-named tributary (“UT”) to Hurricane Branch (“XBL”) – Chowan and Dismal Swamp (Chowan River Sub-basin). During the 2016 305(b)/303(d) Integrated Water Quality Assessment, the tributary was assessed as a Category 4A water. The Aquatic Life Use is impaired due to an altered benthic community. The Recreation Use, Wildlife Use, and Fish Consumption Use were not assessed. The stream impairment was addressed in the Hurricane Branch Watershed (un-named tributaries) Benthic Total Maximum Daily Load (“TMDL”), which was approved by the U.S. Environmental Protection Agency (“EPA”) on September 30, 2004 and by the State Water Control Board (“SWCB”) on March 15, 2005. The impairment was attributed to “elevated levels of non-point source runoff” leading to “stream erosion and sedimentation problems that degrade benthic macroinvertebrate habitat.” Allocations were assigned to sediment as a surrogate parameter. Due to the Aquatic Life Use impairment, the tributary is considered a Tier 1 water.

Affected waters also include a second mapped UT to XBL – Chowan and Dismal Swamp (Chowan River Sub-basin). The second tributary was not assessed during the 2016 305(b)/303(d) Integrated Water Quality Assessment (Category 3A). The stream is located within the study area for the Hurricane Branch Watershed (un-named tributaries) Benthic TMDL, which was approved by the EPA on September 30, 2004 and by the SWCB on March 15, 2005. Allocations were assigned to sediment as a surrogate parameter for hydrologic alteration. The tributary is intermittent and is considered a Tier 1 water.

Affected waters also include Birchin Creek, UT to Birchin Creek – Chowan and Dismal Swamp (Chowan River Sub-basin). The streams were not assessed during the 2016 Water Quality Assessment and are considered Category 3A waterbodies. There is no TMDL for the area. Birchin Creek and its perennial tributaries are considered Tier 2 waters. The intermittent and ephemeral tributaries are Tier 1 waters.

11. Based on the foregoing information, the Board concludes that the Responsible Parties violated Va. Code § 62.1-44.15:20(A), 9 VAC 25-210-50(A), and requirements at VWP Individual Permit No. 15-1145 Parts I.C.2, 6, 13 & 25. The allocation of responsibility among the parties is provided by Appendix B.

#### **SECTION D: Agreement and Order**

Accordingly, by virtue of the authority granted it in Va. Code §§ 62.1-44.15, the Board orders:

1. GSA, through Mortenson and HPC, to perform the actions described in Appendix A of this Order; and

2. Mortenson and HPC to pay a total civil charge of **\$101,400** within 30 days of the effective date of the Order in settlement of the violations cited in this Order.

Payment shall be made by check, certified check, money order or cashier's check payable to the "Treasurer of Virginia," and delivered to:

Receipts Control  
Department of Environmental Quality  
Post Office Box 1104  
Richmond, Virginia 23218

Mortenson and HPC shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Environmental Emergency Response Fund (VEERF). If the Department is required to refer collection of moneys due under this Order to the Department of Law, Mortenson and HPC shall be liable for attorneys' fees of 30% of the amount outstanding.

#### **SECTION E: Administrative Provisions**

1. The Board may modify, rewrite, or amend this Order with the consent of the Responsible Parties for good cause shown, or on its own motion pursuant to the Administrative Process Act, Va. Code § 2.2-4000 *et seq.*, after notice and opportunity to be heard.
2. This Order addresses and resolves only those violations specifically identified in Section C of this Order. This Order shall not preclude the Board or the Director from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the facility; or (3) taking subsequent action to enforce the Order.
3. For purposes of this Order and subsequent actions with respect to this Order only, the Responsible Parties admit to the jurisdictional allegations, and agree not to contest, but neither admit nor deny, the findings of fact and conclusions of law in this Order as contained herein.
4. The Responsible Parties consent to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Order. Responsible Parties acknowledge that any civil action taken by the Board to enforce the terms of this Order will be in the Circuit Court of the City of Richmond. Responsible Parties, GSA in particular as a federal party, do not waive any rights they may have to seek removal of such action to federal court pursuant to 28 U.S.C. § 1441 *et seq.*
5. The Responsible Parties declare they have received fair and due process under the Administrative Process Act and the State Water Control Law and waive the right to any hearing or other administrative proceeding authorized or required by law or regulation,

and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Board to modify, rewrite, amend, or enforce this Order.

6. Failure of the Responsible Parties to comply with any of the terms of this Order shall constitute a violation of an order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Board or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.
7. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.
8. The Responsible Parties shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or such other unforeseeable circumstances beyond its control and not due to a lack of good faith or diligence on its part. The Responsible Parties shall demonstrate that such circumstances were beyond their control and not due to a lack of good faith or diligence on their part. The Responsible Parties shall notify the DEQ Regional Director verbally within 24 hours and in writing within three business days when circumstances are anticipated to occur, are occurring, or have occurred that may delay compliance or cause noncompliance with any requirement of the Order. Such notice shall set forth:
  - a. the reasons for the delay or noncompliance;
  - b. the projected duration of any such delay or noncompliance;
  - c. the measures taken and to be taken to prevent or minimize such delay or noncompliance; and
  - d. the timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director verbally within 24 hours and in writing within three business days, of learning of any condition above, which the Responsible Parties intend to assert will result in the impossibility of compliance, shall constitute a waiver of any claim to inability to comply with a requirement of this Order.

9. This Order is binding on the parties hereto and any successors in interest, designees and assigns, jointly and severally.
10. This Order shall become effective upon execution by both the Director or his designee and the representatives of each of GSA, Mortenson and HPC. Nevertheless, the

Responsible Parties agree to be bound by any compliance date which precedes the effective date of this Order.

11. This Order shall continue in effect until:
  - a. The Director or his designee terminates the Order after completion of all of the requirements of the Order;
  - b. The Responsible Parties petition the Director or his designee to terminate the Order after it has completed all of the requirements of the Order and the Director or his designee approves the termination of the Order; or
  - c. The Director or Board terminates the Order in his or its sole discretion upon 30 days' written notice to the Responsible Parties.

Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve the Responsible Parties from their obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. Any plans, reports, schedules or specifications attached hereto or submitted by the Responsible Parties and approved by the Department pursuant to this Order are incorporated into this Order. Any non-compliance with such approved documents shall be considered a violation of this Order.
13. The undersigned representatives certify that they are responsible officials authorized to enter into the terms and conditions of this Order and to execute and legally bind their respective party to this document. Any documents to be submitted pursuant to this Order shall also be submitted by a responsible official.
14. This Order constitutes the entire agreement and understanding of the parties concerning settlement of the violations identified in Section C of this Order, and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Order.
15. In accordance with the Federal Anti-Deficiency Act, the obligations of GSA under this Order are expressly conditioned on the availability of Congressional appropriations, which GSA agrees to seek in amounts sufficient to timely accomplish the undertakings herein. If sufficient appropriations are not available and cannot be obtained, GSA will promptly inform the DEQ Regional Director. In such case, the Director may terminate the Order and take other action, if so desired, or amend the Order with the Responsible Parties' consent or in accordance with the Administrative Process Act.
16. By its signature below, the Responsible Parties voluntarily agree to the issuance of this Order.

And it is so ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

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James Golden, Regional Director  
Department of Environmental Quality

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U.S. General Services Administration voluntarily agrees to the issuance of this Order.

Date: \_\_\_\_\_ By: Joanna Rosato, Regional Commissioner  
U.S. General Services Administration Signing Official

Commonwealth of ~~Virginia~~ New Jersey  
City/County of Cherry Hill, Camden

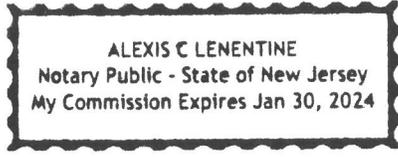
The foregoing document was signed and acknowledged before me this 30 day of  
September, 2020, by Joanna Rosato who is the Regional Commissioner of the Mid-Atlantic  
Region, Public Buildings Service, U.S. General Services Administration on behalf of the agency.

[Signature]  
Notary Public

50097983  
Registration No.

My commission expires: 01/30/2024

Notary seal:



M.A. Mortenson Co. voluntarily agrees to the issuance of this Order.

Date: 1 OCT 2020 By: Erik Youngquist, S  
M.A. Mortenson Co. Signing Official

Minnesota  
~~Commonwealth of Virginia~~  
City/County of Maple Grove/Hennepin

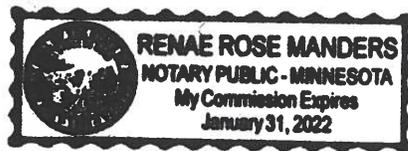
The foregoing document was signed and acknowledged before me this 1st day of October, 2020, by Erik Youngquist who is Vice President, ops of M.A. Mortenson Co. on behalf of the company.

Rena Rose Manders  
Notary Public

31018323  
Registration No.

My commission expires: 1/31/2022

Notary seal:



Hensel Phelps Construction Co. voluntarily agrees to the issuance of this Order.

Date: 09.29.2020 By: [Signature], OPERATIONS MGR.  
Hensel Phelps Construction Co. Signing Official

Commonwealth of Virginia  
City/County of Prince William

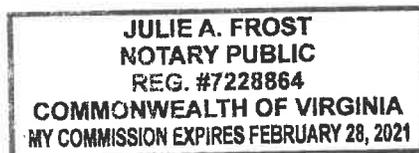
The foregoing document was signed and acknowledged before me this 29 day of  
September, 2020, by Andrew J. George who is  
Operations Manager of Hensel Phelps Construction Co. on behalf of the  
company.

Julie A. Frost  
Notary Public

7228864  
Registration No.

My commission expires: 2/28/2021

Notary seal:



## APPENDIX A SCHEDULE OF COMPLIANCE

1. Responsible Parties shall immediately cease impacts to state waters and shall not resume such impacts unless authorization from DEQ is granted via a Permit.
2. **Sediment Removal from Impacted Areas and Stabilization**: GSA, through Mortenson and HPC, shall remove all sediment impacting the 11,594 LF of stream channel, 4.95 acres of PFO, and 0.01 acres of palustrine emergent wetland, as described in DEQ's consolidated Inspection Report dated July 25, 2018. Sediment removal shall be complete no later than **December 31, 2020**. GSA, through Mortenson and HPC, shall restore all areas impacted by sediment in the 11,594 LF of stream channel, 4.95 acres of PFO, and 0.01 acres of palustrine emergent wetland. The foregoing work shall be consistent and subject to the allocation of responsibility among the parties, as described in Appendix B. In the event any impacts cannot be fully restored, an accurate determination and quantification of impacts shall be reported and appropriate compensation credits shall be purchased. Verification of credit purchase shall be provided to DEQ no later than **December 31, 2020**.
3. **Work Completion Report**: GSA shall provide an updated Work Completion Report to DEQ **within 30 days** of full sediment removal and site stabilization. The Work Completion Report shall address corrective action required in both Appendices A and B. The Completion Report is subject to DEQ review and approval, and shall at a minimum, include a narrative description of work, dates performed, and digital imagery of the work areas confirming work completion. GSA shall respond to any DEQ Notice of Deficiency regarding the Work Completion Report within 14 calendar days.

GSA shall submit all required documentation of Appendices A and B of this Order via regular mail and/or email to:

Enforcement Manager  
Department of Environmental Quality  
Piedmont Regional Office  
4949A Cox Road  
Glen Allen, Virginia 23060

Jefferson.Reynolds@DEQ.Virginia.gov

Items in Green are  
Hensel Phelps areas

Items in White are  
Mortenson areas



## Site Inspection

Site Name: FASTC (Foreign Affairs Special Training Center)

Date: 7/24/2018

Impact #/Location	Impact and Type	Notes	Recommended Corrective Actions
<b>Fort Pickett Site Visit Notes, 6/11/2018, Allison Dunaway &amp; Cara Witte</b>			
Range	None recorded	Potential previous sedimentation impacts appear to have been removed from jurisdictional surface waters.	Reseed with appropriate wetland seed mix. Ensure perimeter controls are functional and maintained and slopes are stabilized as soon as possible. Outfall of temporary sediment basin in southern corner of property discharges perpendicular and even slightly counter to stream flow. Due to this, the discharge is beginning to cut on the downstream side of the riprap outfall protection, causing erosion. Repair. Replace avoided area flagging.
Impact 21	68 linear feet of stream channel	3 to 4 inches of sediment	Replace avoided area flagging. Stabilize slopes above and below perimeter controls. Using hand tools, remove sediment downstream of the impact area. Use wetland seed mix. Repair check dams. Channel appears straightened through bottomless culvert.
Impact 18	199 linear feet of stream channel	Approximately 1-4 inches of sediment in the stream channel from failed erosion and sediment controls and unstable bank slopes.	Stabilize slopes above and below perimeter controls. Using hand tools, remove sediment downstream of the impact area. Use wetland seed mix. Repair check dams. Channel appears straightened through bottomless culvert. Replace avoided area flagging.
Impact 19	110 linear feet of stream channel	Approximately 1-3 inches of sediment in the downstream intermittent stream channel from failed erosion and sediment controls.	Stabilize slopes above and below perimeter controls. Using hand tools, remove sediment downstream of the impact area. Use wetland seed mix. Repair check dams. Channel appears straightened through bottomless culvert. Replace avoided area flagging.
Impact 26	151 linear feet of stream channel impacts	Approximately 1-5 inches of sediment present in the stream channel from failed erosion and sediment controls and unstable bank slopes.	Extend silt fence up north slope of stream (upstream side of crossing) to prevent further erosion of the north bank. Repair (lay back) and stabilize south bank. Stabilize all slopes above and below perimeter controls. Using hand tools, remove sediment downstream of the impact area. Use wetland seed mix. Repair check dams. Replace avoided area flagging with high-visibility tape or safety fence with do-not-disturb signs.
Impact 01-R1	See results from 07-13 visit	See results from 07-13 visit	Continue to pump wetland upstream of crossing. Stabilize all slopes above and below perimeter controls. Use wetland seed

# Site Inspection



Site Name: FASTC (Foreign Affairs Special Training Center)

Date: 7/24/2018

Impact #/Location	Impact and Type	Notes	Recommended Corrective Actions
			mix. Replace avoided area flagging with high-visibility tape or safety fence with do-not-disturb signs.
<b>06/11/2018 total = 528 linear feet of stream channel</b>			
<b>Fort Pickett Site Visit Notes, 6/20/2018, Jean Bradford &amp; Cara Witte</b>			
Impact 41	1.76 acre of PFO wetland impacts  746 linear feet of stream channel impacts	<u>Downstream:</u> Riprap is in wetland and stream. Appears to be from road erosion. Contractor says that the road was here in Oct 2016 when they started work. Rock distribution appears to be recent, herbaceous vegetation appears to be less than one year old. <u>Upstream:</u> Sediment present in PFO and stream from ESC failure 1-3 inches.	Clean out sediment and riprap. 367 linear feet upstream, 379 linear feet downstream
Crossing in between Impacts 21 and 18 (Placemarks 45, 46, 47)	TBD with as-built survey.	Level spreaders very close to wetland and buffer area.	As-built survey requested. 0.07 acre (approx. 3276 square feet) of PFO wetlands appear to have been impacted.
Placemark 49 (W of Impact 41, W side swale)	292 linear feet of stream channel**	1-6 inches of sediment.	Using hand tools, remove sediment from stream bed. **Not on the JD map and not included in final impact number.
Placemark 7 (west of Impact 41)	TBD	Impacts to wetlands may be present. No silt fence.	As-built survey needed.
Impact 28	485 linear feet of stream channel  0.10 acre of PFO wetland	<u>Downstream:</u> Sediment/gravel present in stream/PFO (1-6 inches). <u>Upstream:</u> Sediment (2-16 inches) present in PFO and stream from ESC failure (2 of 3 fingers).	As-built survey upstream. Stabilize silt fence. Clean out sediment and install ESC controls. Create low flow channel downstream.
Impact 27	941 linear feet of stream channel	<u>Downstream:</u> Sediment in stream and outfall riprap (2-12 inches). <u>Upstream:</u> Sediment present in stream.	Stabilize slopes and install ESC Controls. Clean out sediment. Riprap may be improperly sized for low-flow stream channel.

# Site Inspection



Site Name: FASTC (Foreign Affairs Special Training Center)

Date: 7/24/2018

Impact #/Location	Impact and Type	Notes	Recommended Corrective Actions
Impact 44	49 linear feet of stream channel	As-built survey requested	Remove stabilization blankets from stream channel. Remove rip rap from areas outside LOD.
<b>06/20/2018 total = 2221 lf of stream channel and 1.86 acre of PFO wetland</b>			
<b>Fort Pickett Site Visit Notes, 6/20/2018, Bryan Jones, Justin Brown, and Alex Gilliam</b>			
Remaining Surface Waters between Impact Areas 15/25 & 14	0.03 acre of PFO wetland (1325 square feet)	Approximately 1325 square feet of sediment accumulation about 4" deep in PFO wetland on right bank directly upstream of Impact Area 14. (Photo 15)	Using hand tools, remove sediment in area identified by orange boundary markings and stabilize with appropriate wetland seed mix.
Remaining Surface Waters between Impact Areas 15/25 & 14	80 linear feet of stream channel	Approximately 80 linear feet of stream bed has sediment accumulations 18"+ deep directly upstream of Impact Area 14.	Using hand tools, remove sediment in stream bed directly upstream of Impact Area 14.
Remaining Surface Waters between Impact Areas 15/25 & 14	370 linear feet of stream channel	Approximately 370 linear feet of stream bed has sediment accumulations 1-4" deep from Impact Areas 15 and 25 down to stream tributaries confluence.	Using hand tools, remove sediment in stream tributaries directly downstream of Impact Areas 15 and 25.
Remaining Surface Waters between Impact Areas 15/25 & 14	0.02 acre of PFO wetland (1000 square feet)	Approximately 1000 square feet of sediment accumulation about 1-4" deep in PFO wetland directly upstream of the stream tributaries confluence downstream of Impact Areas 15 and 25.	Using hand tools, remove sediment in areas where greater than 2" of sediment has accumulated and stabilize with appropriate wetland seed mix.
Remaining Surface Waters between Impact Areas 15/25 & 14	320 linear feet of stream channel	Approximately 320 linear feet of stream bed has sediment accumulations 4-10" deep from confluence of tributaries below Impact Areas 15 and 25 down to drainage ditch on right bank (approx. 80 linear feet upstream of Impact Area 14).	Using hand tools, remove sediment in stream bed from confluence of tributaries below Impact Areas 15 and 25 down to drainage ditch on right bank (approx. 80 linear feet upstream of Impact Area 14).
Remaining Surface Waters	70 linear feet of stream channel	Approximately 70 linear feet of stream bed has sediment accumulations approximately 10" deep.	Using hand tools, remove sediment in stream bed.

# Site Inspection



Site Name: FASTC (Foreign Affairs Special Training Center)

Date: 7/24/2018

Impact #/Location	Impact and Type	Notes	Recommended Corrective Actions
between Impact Areas 15/25 & 14			
Remaining Surface Waters between Impact Area 14 and Old Garnett Road Crossing	50 linear feet of stream channel	Approximately 50 linear feet of stream bed has sediment accumulations about 6" deep; located on left bank of main stream, directly upstream of Old Garnett Road crossing.	Using hand tools, remove sediment in stream bed.
Remaining Surface Waters between Impact Area 14 and Old Garnett Road Crossing	290 linear feet of stream channel	Approximately 4-6" of sediment has accumulated in isolated spots of stream bed in main stream. Most significant accumulations are primarily on edges of stream bed rather than through entire stream bottom.	Using hand tools, spot removals of sediment in main stream bed where 4-6" of sediment has accumulated.
Impact Area 35	100 linear feet of stream channel	Approximately 100 linear feet of stream bed has sediment accumulations about 17" deep; located directly downstream of Impact Area 35.	Using hand tools, remove sediment in stream bed.
Impact Area 35	0.01 acre of PFO wetland (375 square feet)	Approximately 375 square feet of sediment accumulation about 5" deep; located on right bank of stream bed directly downstream of Impact Area 35. Traces of sediment were observed in stream bed downstream to old road crossing.	Using hand tools, remove sediment in area identified by orange boundary markings and stabilize with appropriate wetland seed mix.
Impact Area 35	0.01 acre of PFO wetland (390 square feet)	Approximately 5" of sediment has accumulated in two linear PFO wetland features, combining to approximately 390 square feet.	Using hand tools, remove sediment in linear wetland features and stabilize with appropriate wetland seed mix.
Level Spreader between Impact Areas 7 & 42	As-built survey requested	Possible exceedance due to construction of level spreader; corners of level spreader and adjacent wetland flagging were recorded in GPS; need further review.	As-built survey requested
Stream confluence between Impact	0.10 acre of PFO wetland	1-4 inches of sediment accumulation	Using hand tools, remove sediment and stabilize with appropriate wetland/riparian seed mix.

# Site Inspection



Site Name: FASTC (Foreign Affairs Special Training Center)

Date: 7/24/2018

Impact #/Location	Impact and Type	Notes	Recommended Corrective Actions
Area 7 and Impact Area 42			
Level Spreader on Left Bank, Upstream of Impact Area 42	0.12 acre of PFO wetland	Approximately 3-6" of sediment has accumulated below the level spreader in the PFO wetland and adjacent floodplain below level spreader.	Using hand tools, remove sediment and stabilize with appropriate wetland/riparian seed mix.
<b>06/20/2018 total = 1280 linear feet of stream channel and 0.29 acre of PFO wetland</b>			
<b>Fort Pickett Site Visit Notes, 6/27/2018, Bryan Jones, Cara Witte, and Alex Gilliam</b>			
Impact Area 6 Upstream	1044 linear feet of stream channel  0.46 acre of PFO impacts	Sediment bag within PFO wetland upstream of inlet. Large area of sand deposition upstream, depths undetermined (Photo 33). Approximately 24" HDPE pipe about 25' long in PFO wetland. Varying amounts of sediment observed within stream bed extending upstream of Impact 6.	Remove sediment bag from wetlands and stabilize with appropriate wetland seed mix. Additional corrective actions upstream of Impact 6 TBD.
Impact Area 6 Downstream to Impact Area 8	2232 linear feet of stream channel  0.15 acre of PFO wetland	1- 16 inches of sediment within PFO wetlands and stream bed extending downstream to confluence with main stream and continue downstream. Limits of disturbance on right bank appear to encroach in PFO wetlands (Placemark 103).	As-built survey of construction activities, including limits of disturbance, for facility on right bank downstream of Impact Area 6. Additional corrective actions downstream of Impact 6 TBD.
Bioretention pond southwest of Impact Area 6	0.04 acre of PFO wetland	1-3 inches of sediment present in wetland	Repair ESC controls from stormwater basin. Remove sediment from wetlands
Impact Area 9	0.13 acre of PFO wetland	Large amounts of sediment has accumulated on the silt fence on right bank under bridge. Rill erosion present on graded slope on right bank. Rill erosion present under stabilization netting on left bank slope.	Establish permanent stabilization as soon as possible on right bank and continue to cleanout sediment accumulations and maintain silt fence. Repair and stabilize all areas of rill erosion.
Impact 10	0.02 acre of PFO wetland	Sediment has accumulated in PFO wetland on downstream side of impact area. Outfall protection is overwhelmed with sediment. Sediment appears to have been recently clean on	Using hand tools, remove sediment in areas where greater than 2" of sediment has accumulated and stabilize with appropriate wetland seed mix. Clean sediments out of outfall protection. Repair and stabilize all areas of rill erosion.

# Site Inspection



Site Name: FASTC (Foreign Affairs Special Training Center)

Date: 7/24/2018

Impact #/Location	Impact and Type	Notes	Recommended Corrective Actions
		upstream side of impact area. Rill erosion present on slopes.	
Impact 11	Non jurisdictional but corrective action required	Sediment bag present on downstream right bank.	Remove sediment bag if not being used.
Stream channel between Impact Area 9 and Impact Area 42	2257 linear feet of stream channel	2-16 inches of sediments forming sand bars throughout segment of stream channel (Photo 36).	Using hand tools, remove all sediment until natural stream bed is met.
Sediment Trap 51	None	Silt fence damaged.	Repair and maintain E&S Controls.
Dry Pond 408	0.01 acre of PEM wetland	Approximately 8 inches of sediment has accumulated in PEM wetland below outfall.	Using hand tools, remove sediment in wetland and stabilize with appropriate wetland seed mix.
Dry Pond 424	0.03 acre of PFO wetland	Approximately 0.5-1 inches of sediment has accumulated in PFO wetland below outfall.	Stabilize area with appropriate wetland seed mix.
Outfall 610 A (furthest outfall upstream of Impact 6)	0.05 acre of PFO wetland	Approximately 1-2 inches of sediment has accumulated in PFO wetland. Originally proposed bio retention structure was removed from construction plans.	Using hand tools, remove sediment in wetland and stabilize with appropriate wetland seed mix.
Sediment basin east of bioretention pond 409. East of stream confluence	0.04 acre of PFO wetland	Approximately 1-4 inches of sediment present downslope of basin.	Using hand tools, remove sediment in wetland and stabilize with appropriate wetland seed mix.
<b>06/27/2018 totals = 5533 linear feet of stream channel, 0.92 acre of PFO wetlands, and 0.01 acre of PEM wetlands</b>			
<b>Fort Pickett Site Visit Notes, 07/09/2018, Cara Witte and Alex Gilliam</b>			
Impact Area 7	None	Possible flow impedance from riprap being too large in diameter	Monitor in future site inspections

# Site Inspection



Site Name: FASTC (Foreign Affairs Special Training Center)

Date: 7/24/2018

Impact #/Location	Impact and Type	Notes	Recommended Corrective Actions
Impact Area 8	226 linear feet of stream channel	Trace sediments present in channel	No action
Impact Area 40	Impacts taken as permitted	No action	No action
Impact Area 2	0.32 acre of sediment in PFO wetland	One inch of sediment present in PFO wetland	Slope stabilization in upland areas adjacent to wetlands. No sediment removal required.
Impact Area 13	Impacts taken as permitted	None	None
Impact Area 43 (outfall and stream channel)	1136 linear feet of stream channel	Approximately 5-12 inches of sediment in the stream channel	Downstream = 858 linear feet of stream channel Upstream = 278 linear feet of stream channel  Using hand tools, remove all sediment from outfall area to utility corridor until natural stream bed is met. Remove filter/dirt bag from upland area.
East and downstream of Impact Area 43 (wetland area)	0.12 acre of sediment in PFO wetland	2-3 inches of sediment present	Fix silt fence as needed Using hand tools, remove sediment from impacted area Install silt fence in upland areas adjacent to stream channels to prevent additional impacts
Spoils stockpile area east of Impact Area 43	N/A	Spoils pile adjacent to stream channels.	Repair silt fence and seed for erosion control seed.
PM 147	Non jurisdictional but corrective action required	None	Repair silt fence
Impact Area 17	None recorded	Trace sediments present in channel	Repair silt fence. Remove sediment from outfall area
<b>07/09/2018 total = 1362 linear feet of stream channel and 0.44 acre of PFO wetland</b>			
<b>Fort Pickett Site Visit Notes, 07/13/2018, Cara Witte</b>			
East of Impact Area 16, north of	0.02 acre of PFO wetland	Trace sediment observed in wetlands	No action

# Site Inspection

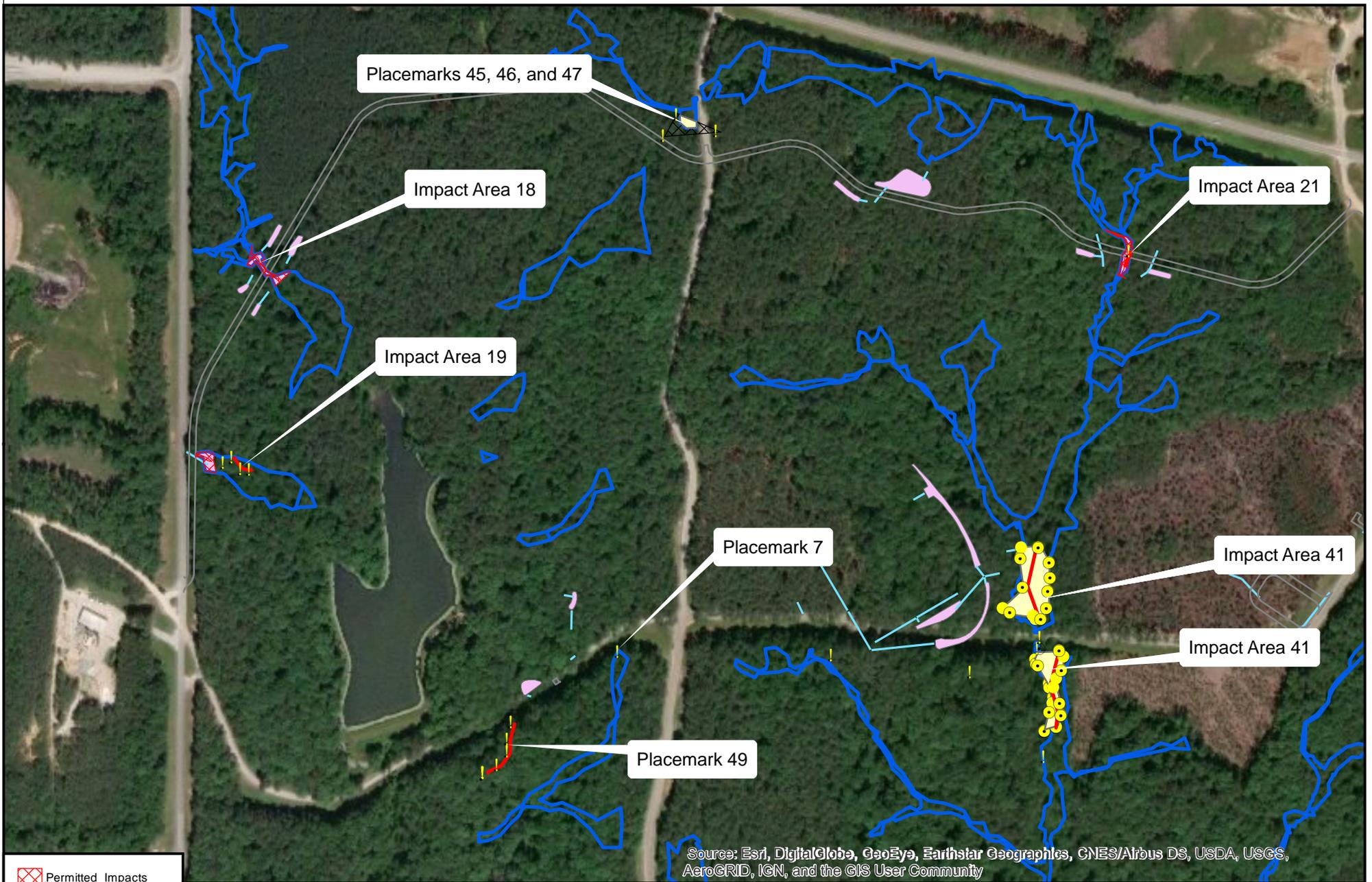


Site Name: FASTC (Foreign Affairs Special Training Center)

Date: 7/24/2018

Impact #/Location	Impact and Type	Notes	Recommended Corrective Actions
bioretention pond 221			
Impact Area 25	Revisited. See impact 06-20	2-4 inches of sediment observed in stream channel	Remove sediments from downstream channel
Impact Area 29	250 linear feet of stream channel	10-11 inches of sediment present in stream channel	Stabilize bank slopes. Remove sediment using hand tools.
Impact Area 24	Impacts taken as permitted	None	Repair silt fence. Monitor for hydrological connectivity.
Placemark 170 (stormwater basin W of 24)	33 linear feet of stream channel	Approximately 2 inches of sediment present from stormwater discharges	Removed sediment using hand tools in May 2018 in coordination with Cardno.
01-R1 (revisit)	387 linear feet of stream channel impacts  1.42 acres of PFO wetland impacts	2-10 inches of sediment accumulation in PFO wetlands and stream channel from bridge construction.	Stabilize banks. Remove sediment using hand tools.
<b>07/13/2018 total = 1.44 acre of PFO wetland and 670 linear feet of stream channel</b>			

<b>Totals from all DEQ VWP inspections:</b>
<b>Stream channel total 2.2 miles or 11,594 linear feet</b>
<b>Wetland total 4.96 acres</b>

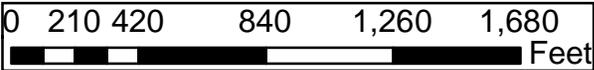


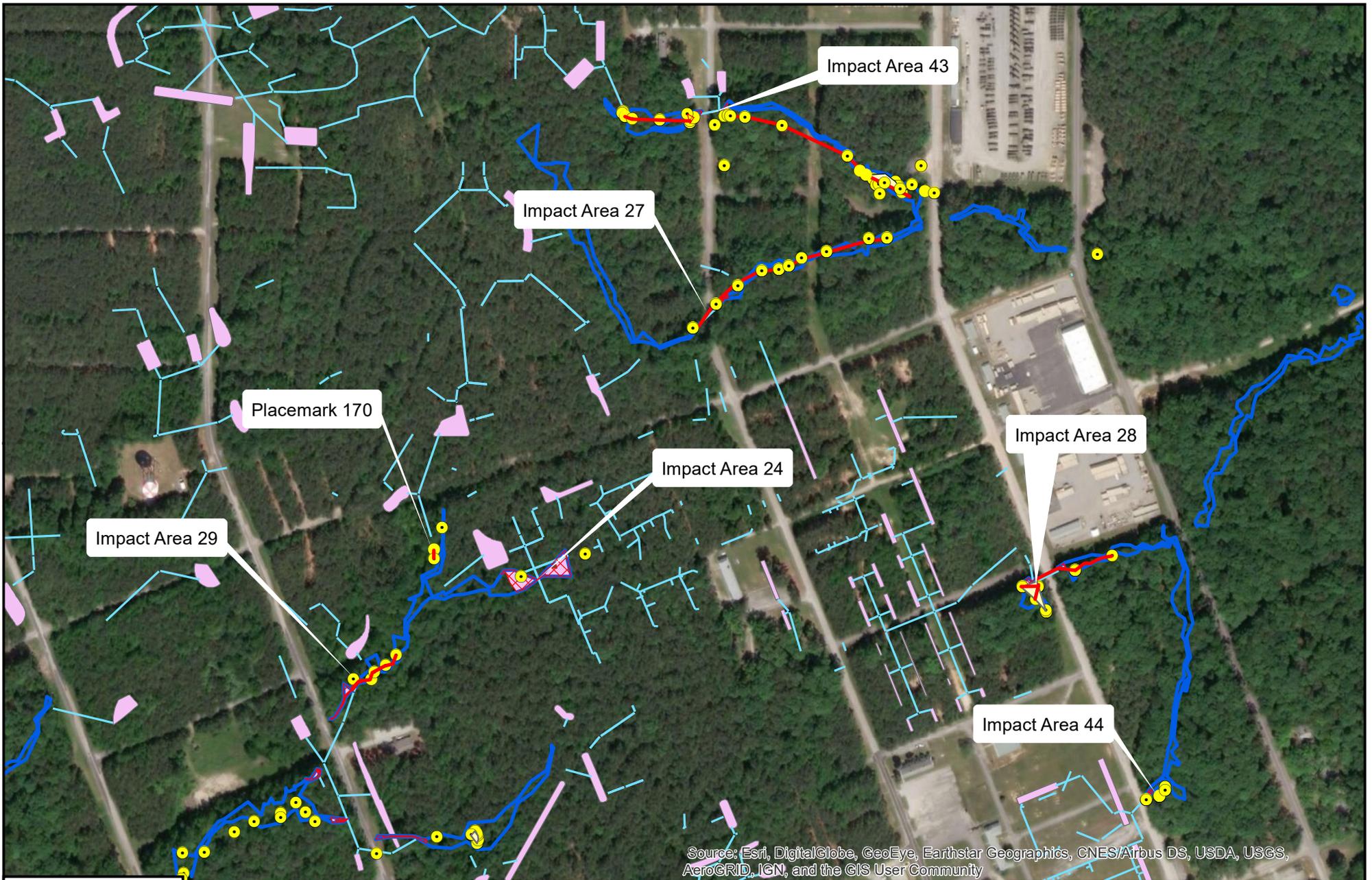
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**Foreign Affairs Security Training Center (FASTC)  
DEQ VWP inspection results  
Fort Pickett, VA**

**Inspection dates: 06/11, 06/20, 06/27, 07/09, 07/13  
Date Created: 07/24/2018**

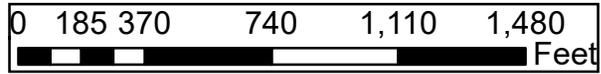
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-  Storm
-  Wetlands
-  Ponds
- DEQ VWP datapoints**
-  0





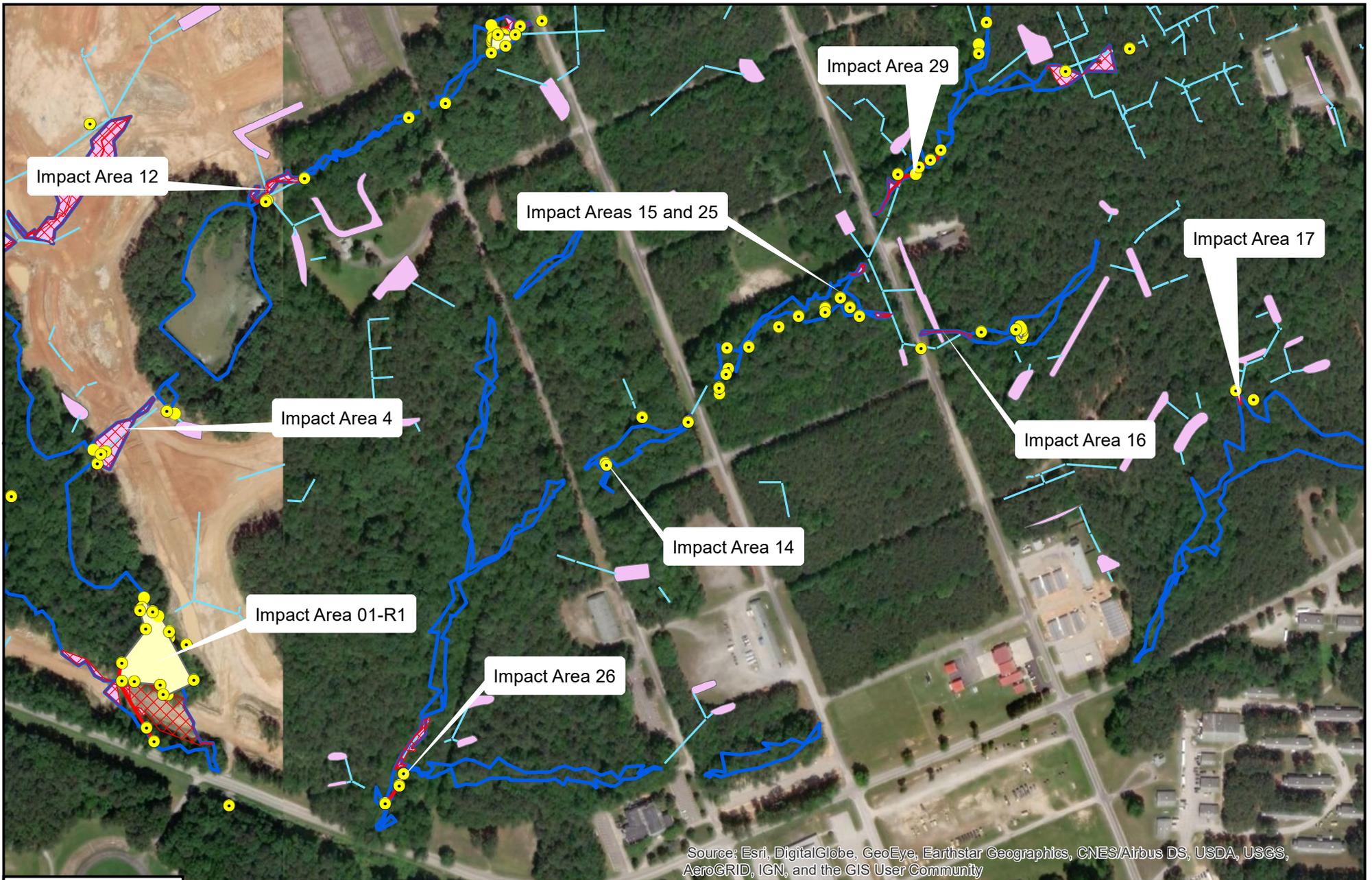
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- ▣ Permitted Impacts
- Storm
- Wetlands
- ▭ Ponds
- DEQ VWP datapoints**
- 0



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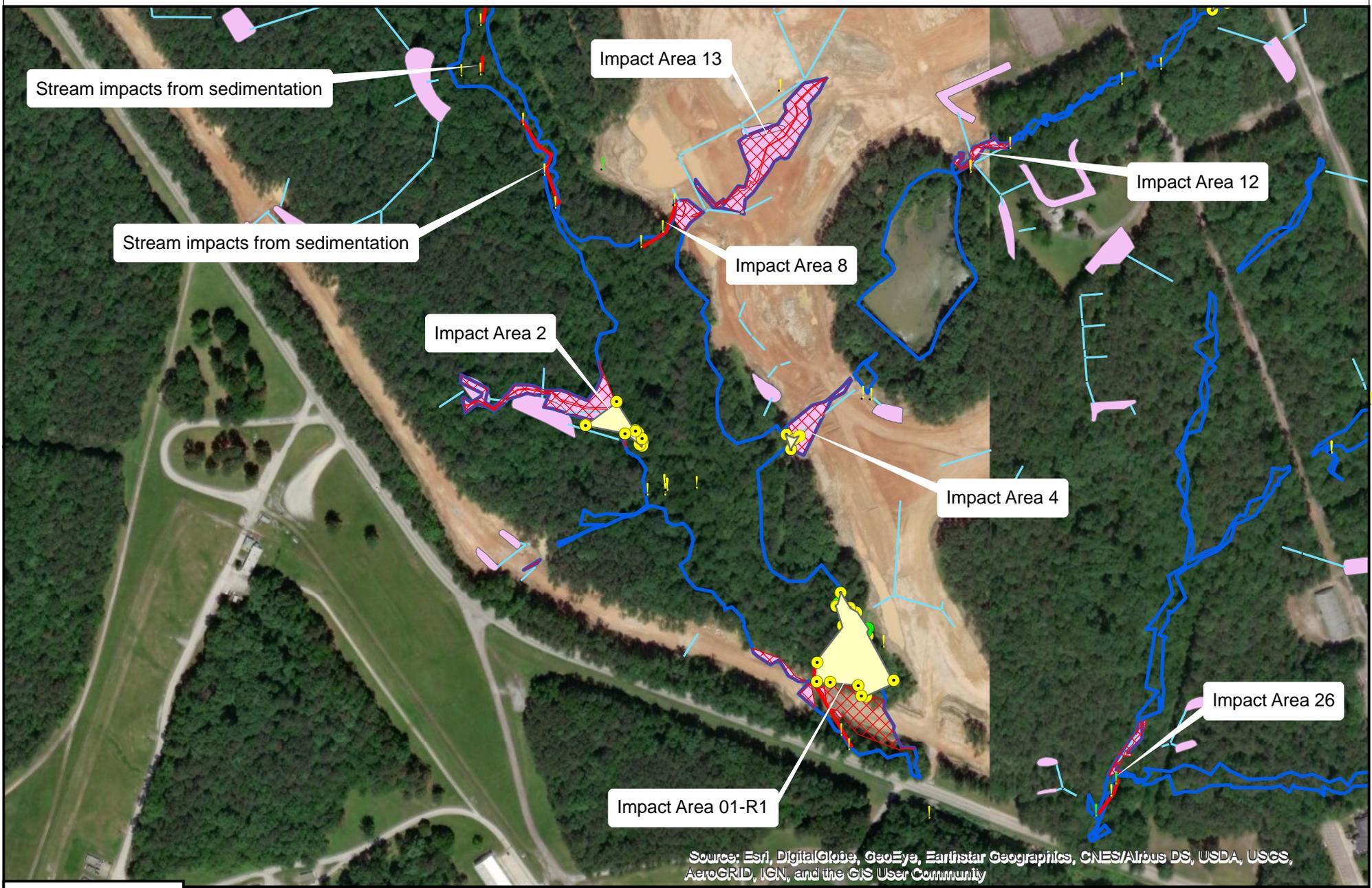
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-  Permitted Impacts
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-  Ponds
- DEQ VWP datapoints**
-  0



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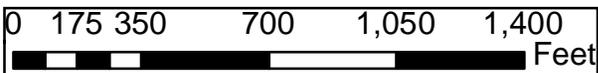


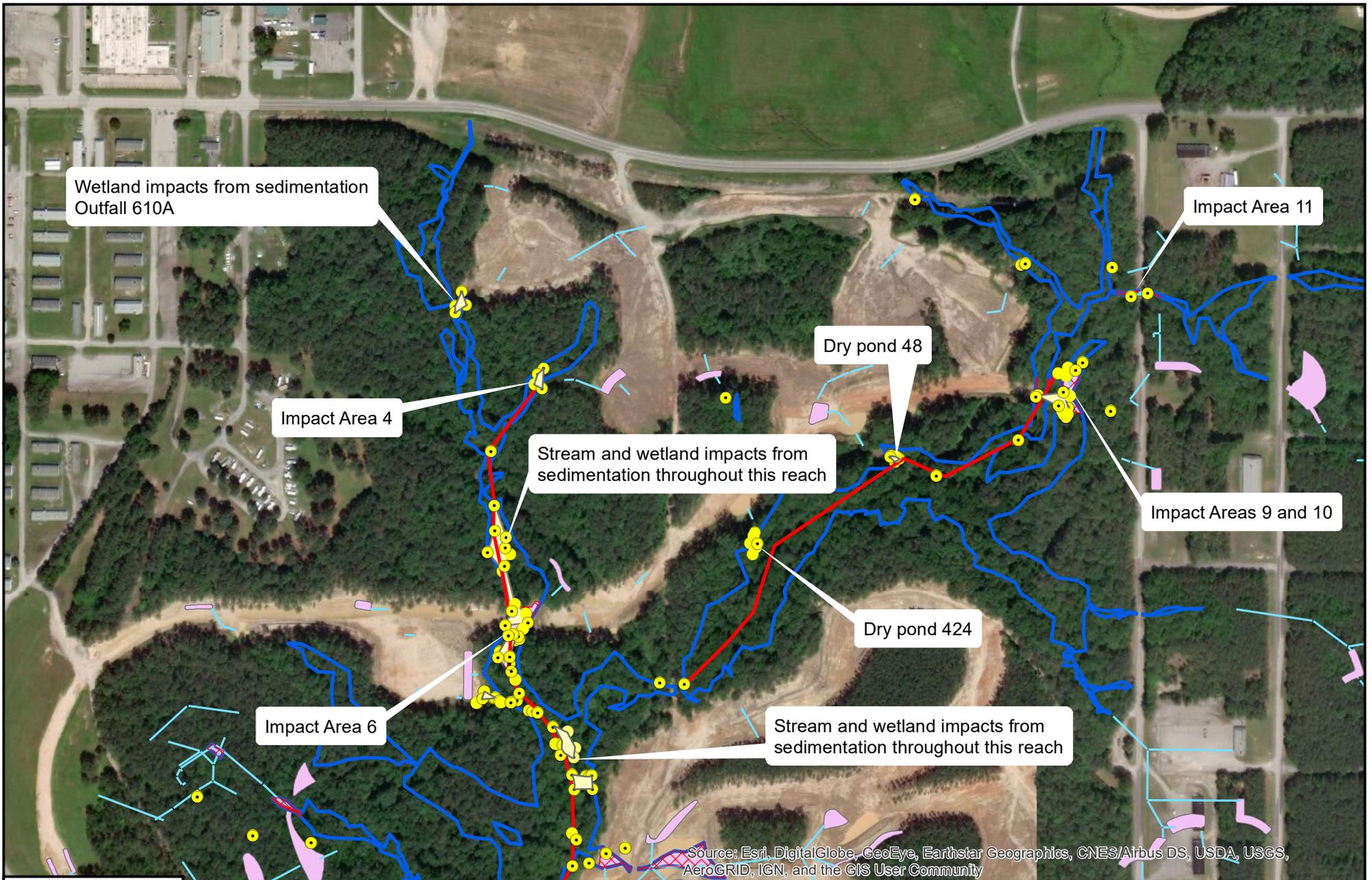
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-  Permitted Impacts
-  Storm
-  Wetlands
-  Ponds
- DEQ VWP datapoints**
-  0





Wetland impacts from sedimentation  
Outfall 610A

Impact Area 11

Impact Area 4

Dry pond 48

Stream and wetland impacts from  
sedimentation throughout this reach

Impact Areas 9 and 10

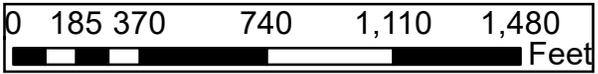
Dry pond 424

Impact Area 6

Stream and wetland impacts from  
sedimentation throughout this reach

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

- Permitted Impacts
- Storm
- Wetlands
- Ponds
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- 0



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