

Stormwater Pollution Prevention Plan (SWPPP)

For Construction Activities At:

Section 5, Alexander Hamilton Field
Estate Mannings Bay, Prince Quarter
Christiansted, St. Croix USVI 00821

SWPPP Prepared For:

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SWPPP Preparation Date:

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Estimated Project Dates:

Project Start Date: 10 / 01 / 2023
Project Completion Date: 07 / 31 / 2025

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SECTION 1: CONTACT INFORMATION/RESPONSIBLE PARTIES

1.1. OPERATOR(S) / SUBCONTRACTOR(S)

Operator(s):

VIGL Operations, LLC
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Christiansted, VI 00820

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1.2. STORMWATER TEAM

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SECTION 2: SITE EVALUATION, ASSESSMENT, AND PLANNING

2.1 PROJECT/SITE INFORMATION

Project Name and Address

Project/Site Name: **Randall "Doc" James Racetrack Redevelopment Project**
Section 5, Alexander Hamilton Field
Estate Mannings Bay, Prince Quarter

Project Latitude/Longitude

(Use **one** of three possible formats, and specify method)

Latitude:
1. 17 ° 41' 51.2" N

Longitude:
1. 64° 47' 26.9" W

Method for determining latitude/longitude:

- USGS topographic map (specify scale: _____) EPA Web site GPS
 Other (please specify): Google Earth

Horizontal Reference Datum:

- NAD 27 NAD 83 or WGS 84 Unknown

Additional Project Information

Is the project/site located on Indian country lands, or located on a property of religious or cultural significance to an Indian tribe? Yes No

Are you applying for permit coverage as a "federal operator" as defined in Appendix A of the 2012 CGP? Yes No

2.2 DISCHARGE INFORMATION

Water flow onto the site from upstream sources in this watershed is minimal, as the Airport property drains to large culverts that discharge to the Bethlehem Gut.

The waterbodies to the south of the project site are Assessment Unit VI-STC-64 (Manning Bay/Estate Anguilla Beach) and VI-STC-70 (Airport, nearshore), are both designated as Class B waters. A review of the 2020 VIDPNR Integrated Report and draft 2022 303(d) list indicates VI-STC-64 has a single ambient sampling location, sampled quarterly by VIDPNR, sample station STC-23. The waterbody is currently considered impaired for Dissolved Oxygen and pH. VI-STC-70 has no routine water quality monitoring stations and its status as impaired vs. unimpaired is Unknown.

Does your project/site discharge stormwater into a Municipal Separate Storm Sewer System (MS4)? Yes No

Are there any surface waters that are located within 50 feet of your construction disturbances? Yes No

2.3 NATURE OF THE CONSTRUCTION ACTIVITY

General Description of Project

The overall project approach is to develop a world class racing facility, casino and entertainment center to revitalize the racing industry on St. Croix. The renovation of the RDJ Racetrack Stadium and Casino development project at Estate Manning Bay includes development of a racing entertainment center, a casino, concession stands, stadium renovation and construction of vendor units, veterinarian clinic, new bathrooms and parking areas.

The redevelopment of the RDJ Racetrack will take place within the current footprint of the existing racetrack at Section 5, Alexander Hamilton Field, Estate Manning Bay, as well as a 19.48-acre plot of land east of the racetrack. This revised scope will rebuild the previous racetrack further to include a casino, quarantine barn, veterinary services, improved paddocks, grandstand stadium, bleacher seating and support concessions.

This development will stimulate greater interest and community participation in equestrianism, heighten awareness of the importance of horseracing best management practices and thereby result in an improved and wholesome modern racing facility and industry on the island of St. Croix. It will also provide a venue for social events outside of racing which will attract Virgin Islanders and visitors to mingle and share cultural experiences. On race day weekends, the volume of people traveling from Tortola, St. Thomas and Puerto Rico and St. John to St. Croix will increase.

The construction of this facility will be a continued long-term use of the area which, through careful design, conservative safety factors, and protective management measures, will maintain and protect the shoreline, wetlands and other natural resources while providing incredible social, cultural and entertainment value to the community and economy of St. Croix.

Soils, Slopes, Vegetation, and Current Drainage Patterns

Soil type(s):

Three main soil types were identified on the parcel with Ustorthents (Us), 0 – 20 percent slopes making up majority of the parcel with smaller parcels of Solitude gravelly fine sandy loam (SoA), 0 – 2 percent slopes, and Glynn gravelly loam (GyB), 2 – 5 percent slopes and (GyC), 5 – 12 percent slopes.

Slopes:

The existing site is not prone to flooding or ponding, and this area has very little slope (<2%) in its current state. Elevation at the project site ranges between 5-20 feet above sea level.

Since the site slope is minimal at less than 5%, flows will be controlled through the sizing and management of the stormwater collection system, including the designed catchment basins, culvert system and grassy swales installed throughout the project area.

Vegetation:

The site has primarily grassy area, covering approximately 65 acres of the 84.63-acre project area, made up almost exclusively of guinea grass (*Panicum maximum*), with some hurricane grass and Bermuda grass.

Drainage Patterns:

The RDJ Racetrack property sits within a small St. Croix watershed, the Airport watershed (HUC_14: 21020002020030). This small watershed drains approximately 1290 acres. However, it sits directly adjacent to the Fair plains Gut (also called the Bethlehem Gut), which drains over 6500 acres of watershed from as far North as Carambola in Estate River.

Water flow onto the site from upstream sources in this watershed is minimal, as the Airport property drains to large culverts that discharge to the Bethlehem Gut. Stormwater runoff east of the existing entrance typically flows toward the Bethlehem Gut channeled by swales on the northern and southern sides of Route 64. Route 64 itself has a rise that causes the flow of stormwater in opposite directions towards the east on one side of the rise and the west on the other side of the rise toward the swales, culverts, drainage path and guts described above.

To ensure that the project design performs properly a hydrology study was performed to evaluate the stormwater management system and pathways. The stormwater flow, made up primarily of rainfall that lands on the site, is proposed to sheet flow to properly designed catchment basins and culvert systems that then direct the water to two primary stormwater retention ponds on site. From these ponds, retention will allow for holding time to settle any potential sediments, and water will sheet flow to existing drainage culverts at the South end of the track and property. Discharge would be through these culverts to the shoreline.

Hydrologic and Hydraulic calculations are shown in the Hydrology Study submitted with **Attachment P**.

Description of storm sewer systems for project area:

The existing stormwater disposal structures for the facility include large concrete culverts along Route 64 that collect and route all upstream watershed flow to the shoreline, situated to the north border of the project site.

On the racetrack property, existing corrugated steel culvert pipes direct sheet flow to the center of the racetrack, and grassy swales assist in routing fringing flows around the track to the east and west. Any sheet flow directed to the center of the track flows to existing additional culverts installed along the South stretch of the racetrack. These culverts discharge to the south and to the Estate Manning Bay shoreline.

Water flow onto the site from upstream sources in this watershed is minimal, as the Airport property drains to large culverts that discharge to the Bethlehem Gut. Stormwater runoff east of the existing entrance typically flows toward the Bethlehem Gut channeled by swales on the northern and

southern sides of Route 64. Route 64 itself has a rise that causes the flow of stormwater in opposite directions towards the east on one side of the rise and the west on the other side of the rise toward the swales, culverts, drainage path and guts described above.

To ensure that the project design performs properly a hydrology study was performed to evaluate the stormwater management system and pathways. The stormwater flow, made up primarily of rainfall that lands on the site, is proposed to sheet flow to properly designed catchment basins and culvert systems that then direct the water to two primary stormwater retention ponds on site. From these ponds, retention will allow for holding time to settle any potential sediments, and water will sheet flow to existing drainage culverts at the South end of the track and property. Discharge would be through these culverts to the shoreline.

Construction Site Estimates

➤ **PRE-DEVELOPMENT**

TABLE 1 - PRE-DEVELOPMENT BASIN CHARACTERISTICS			
DESCRIPTION	AREA	UNITS	WEIGHTED CURVE NUMBER (CN)
BUILDINGS	0.85	AC	95
PAVEMENT	0.79	AC	98
DIRT HORSE TRACK	8.11	AC	89
GRAVEL	3.25	AC	91
GRASS COVER	71.63	AC	80

TOTAL AREA	84.63	AC
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WEIGHTED CN VALUE	82
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➤ **POST-DEVELOPMENT**

TABLE 2 - POST-DEVELOPMENT BASIN CHARACTERISTICS			
DESCRIPTION	AREA	UNITS	WEIGHTED CURVE NUMBER (CN)
BUILDINGS	1.96	AC	95
PAVEMENT	3.68	AC	98
DIRT HORSE TRACK	8.11	AC	89
GRAVEL	5.84	AC	91
GRASS COVER	65.04	AC	80

TOTAL AREA	84.63	AC
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WEIGHTED CN VALUE	83
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Table 5 - Existing Stormwater Retention Area Calculations					
EXISTING RETENTION AREA No. 1					
Stage	Area	Area	Average Area	Incremental Volume	Cumulative Pond Volume
(ft)	(Sq. Ft)	(Acres)	(Acres)	(Ac-ft)	(Ac-ft)
6.0	39,080	0.897			
7.0	56,627	1.300	1.10	1.10	1.10
8.0	74,171	1.703	1.50	1.50	2.60
EXISTING RETENTION AREA No. 2 (recently constructed to offset impacts of anticipated proposed development)					
Stage	Area	Area	Average Area	Incremental Volume	Cumulative Pond Volume
(ft)	(Sq. Ft)	(Acres)	(Acres)	(Ac-ft)	(Ac-ft)
11.0	118,867	2.729			
12.0	132,115	3.033	2.88	2.88	2.88
Existing Cumulative Retention Area Volume = 5.48 Ac-ft					

Table 6 - Modified Stormwater Retention Pond Calculations					
EXISTING RETENTION AREA No. 1					
Stage	Area	Area	Average Area	Incremental Volume	Cumulative Pond Volume
(ft)	(Sq. Ft)	(Acres)	(Acres)	(Ac-ft)	(Ac-ft)
6.0	39,080	0.897			
7.0	56,627	1.300	1.10	1.10	1.10
8.0	74,171	1.703	1.50	1.50	2.60
DEEPEMED EXISTING RETENTION AREA No. 2					
Stage	Area	Area	Average Area	Incremental Volume	Cumulative Pond Volume
(ft)	(Sq. Ft)	(Acres)	(Acres)	(Ac-ft)	(Ac-ft)
10.25	105,845	2.430			
11.0	118,867	2.729	2.58	1.93	1.93
12.0	132,115	3.033	2.88	2.88	4.82
Cumulative Retention Area Storage of 7.42 Ac-ft >> Required Storage for 1-Inch over the site = 7.05 Ac-ft					

Hydrologic and Hydraulic calculations are shown in the Hydrology Study submitted with **Attachment P**.

2.4 SEQUENCE AND ESTIMATED DATES OF CONSTRUCTION ACTIVITIES

Anticipated start date for the project is October 1, 2023, and completion date is estimated for August 31, 2025. A construction schedule is provided in **Appendix O**.

Pre-Construction Phase

A period of approximately **7-10 days** will be required for initial mobilization of equipment due to the scale of the site and project components.

Before any construction work is done on the site, all stormwater BMPs will be installed at designated areas in the provided maps. Silt fencing, berms and catchment areas will be installed according to the minimum standards of the 2002 VI Environmental Protection Handbook (VIEPH). Additional control areas, to include dumpsters, staging and storage areas, fueling station and portable toilets will be established early to maintain a controlled and clean site.

The use of staging and laydown areas will be required for construction. The staging and laydown areas for soil, mulched vegetation, and construction equipment and materials will be carefully managed, and these staging and laydown areas will be established using Silt fencing, installed around all staging area borders.

Construction Phase

The construction phase will begin with several concurrent tasks, including mass grading of areas, and digging of foundations. Stormwater basins will be constructed immediately to retain sediment during the construction phase.

The various building structures will be constructed concurrently, followed by utilities, pipelines and support structures such as potable water tank/cisterns and sewer connections. As final grading is achieved for each section, stabilization will go down in the form of permanent cover, such as vegetation, gravel, riprap or pavement.

Vegetation will be carefully observed until growth of a full vegetated layer has taken hold. Inspections will be performed every **fourteen (14) days** or after any rain event of 0.25" or more within 24 hours to observe for any erosion or sediment loss. Any evidence of rilling or gullying will be addressed within **seven (7) days** to ensure final stabilization of the entire pond area is achieved.

Post-Construction Phase

The post-construction phase will entail evaluation and testing of utilities, confirmation of grade, slope and structure heights. Vegetation will be evaluated to verify it has stabilized all exposed soils, and stormwater BMPs will be verified to have been installed and sized correctly for long-term use. Upon successful completion of all testing, equipment operations and evaluations, final performance reports will be generated. As-built drawings will be created and submitted to VIDPNR for final approval.

Upon receipt of approval of the as-built drawings, VIGL Operations will then demobilize and ensure the project area is completely stabilized for long-term use and operation.

2.5 ALLOWABLE NON-STORMWATER DISCHARGES

There are various non-stormwater discharges anticipated for the RDJ Racetrack Stadium and Casino Development Area. Landscape irrigation will be used to revegetate the site after final earthwork is complete, water will be used to control dust and wash vehicles to prevent offsite tracking of mud or sediment.

Additionally, during construction of the buildings, plumbing lines will be hydrostatically tested and flushed with potable water. Air conditioning units for construction trailers will have condensate drains and footing and foundation trenches may require dewatering if heavy storms occur during the construction phase.

List of Allowable Non-Stormwater Discharges Present at the Site

Type of Allowable Non-Stormwater Discharge	Likely to be Present at Your Site?
Discharges from emergency fire-fighting activities	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Fire hydrant flushings	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Landscape irrigation	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Waters used to wash vehicles and equipment	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Water used to control dust	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Potable water including uncontaminated water line flushings	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Routine external building wash down	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Pavement wash waters	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Uncontaminated air conditioning or compressor condensate	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Construction Dewatering Water	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Uncontaminated, non-turbid discharges of ground water or spring water	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Foundation or footing drains	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

2.6 SITE MAPS

Site maps are included as **Appendix A**.

SECTION 3: DOCUMENTATION OF COMPLIANCE WITH OTHER FEDERAL REQUIREMENTS

3.1 ENDANGERED SPECIES PROTECTION

A review of Endangered Species in the area indicates there are no endangered terrestrial species within the proposed project site, but two federal endangered sea turtle species have been identified and are known to swim in the offshore waters – the Hawksbill Sea Turtle (*Eretmochelys imbricata*) and Leatherback Sea Turtle (*Dermochelys coriacea*). Three threatened species of turtle are also present - the Green Sea Turtle (*Chelonia mydas*), Loggerhead Sea Turtle (*Caretta caretta*), and the Olive Ridley Sea Turtle (*Lepidochelys olivacea*). In addition, the West Indian Manatee (*Trichechus manatus*) has also been found in the offshore waters and are a threatened species.

Eligibility Criterion

Under which criterion listed in Appendix D are you eligible for coverage under this permit?

A **B** **C** **D** **E**

The eligibility criteria are as follows:

- Criterion A.** No federally-listed threatened or endangered species or their designated critical habitat(s) are likely to occur in your site's "action area" as defined in Appendix A of this permit.
- Criterion B.** The construction site's discharges and discharge-related activities were already addressed in another operator's valid certification of eligibility for your action area under eligibility Criterion A, C, D, E, or F and there is no reason to believe that federally-listed species or federally-designated critical habitat not considered in the prior certification may be present or located in the "action area". To certify your eligibility under this Criterion, there must be no lapse of NPDES permit coverage in the other operator's certification. By certifying eligibility under this Criterion, you agree to comply with any effluent limitations or conditions upon which the other operator's certification was based. You must include in your NOI the tracking number from the other operator's notification of authorization under this permit. If your certification is based on another operator's certification under Criterion C, you must provide EPA with the relevant supporting information required of existing dischargers in Criterion C in your NOI form.
- Criterion C.** Federally-listed threatened or endangered species or their designated critical habitat(s) are likely to occur in or near your site's "action area," and your site's discharges and discharge-related activities are not likely to adversely affect listed threatened or endangered species or critical habitat. This determination may include consideration of any stormwater controls and/or management practices you will adopt to ensure that your discharges and discharge-related activities are not likely to adversely affect listed species and critical habitat. To make this certification, you must include the following in your NOI: 1) any federally listed species and/or designated habitat located in your "action area"; and 2) the distance between your site and the listed species or designated critical habitat (in miles). You must also include a copy of your site map with your NOI.

Criterion D. Coordination between you and the Services has been concluded. The coordination must have addressed the effects of your site's discharges and discharge-related activities on federally-listed threatened or endangered species and federally-designated critical habitat, and must have resulted in a written concurrence from the relevant Service(s) that your site's discharges and discharge-related activities are not likely to adversely affect listed species or critical habitat. You must include copies of the correspondence between yourself and the Services in your SWPPP and your NOI.

Criterion E. Consultation between a Federal Agency and the U.S. Fish and Wildlife Service and/or the National Marine Fisheries Service under section 7 of the ESA has been concluded. The consultation must have addressed the effects of the construction site's discharges and discharge-related activities on federally-listed threatened or endangered species and federally-designated critical habitat. The result of this consultation must be either:

- i. a biological opinion that concludes that the action in question (taking into account the effects of your site's discharges and discharge-related activities) is not likely to jeopardize the continued existence of listed species, nor the destruction or adverse modification of critical habitat; or
- ii. written concurrence from the applicable Service(s) with a finding that the site's discharges and discharge-related activities are not likely to adversely affect federally-listed species or federally-designated habitat.

You must include copies of the correspondence between yourself and the Services in your SWPPP and your NOI.

Criterion F. Your construction activities are authorized through the issuance of a permit under section 10 of the ESA, and this authorization addresses the effects of the site's discharges and discharge-related activities on federally-listed species and federally-designated critical habitat. You must include copies of the correspondence between yourself and the Services in your SWPPP and your NOI.

For criterion A, indicate the basis for your determination that no federally-listed threatened or endangered species or their designated critical habitat(s) are likely to occur in your site's action area.

- Specific communication with staff of the U.S. Fish & Wildlife Service or National Marine Fisheries Service.
- Publicly available species list.
- Other source: ESA evaluation through USFWS IPaC tool. Attached in **Appendix K**.

3.2 HISTORIC PRESERVATION

The SCRG and south shore industrial complex has a long and well documented timeline of historical uses, significance and structures onsite or in adjacent properties.

Recent Historical Uses

The land within the project footprint has been used as racetrack for over 75 years.

A Phase1 A&B Archaeological Study was performed on 15 of the 19.48 acres expansion east of the current racetrack during November of 2013 following the Department of Planning and Natural

Resources Division of Historic Preservation "Guidelines for Cultural Resources Investigations" to comply with Title 29, Chapter 17, Section 959 of the Virgin Islands Code. Comprehensive review of the archaeological files was performed to identify cultural resources of record. Additionally, field tests involving surface inspection of the subject property were conducted followed by the excavation of shovel tests established at 30-meter intervals. According to the official study report "The walls of drainage features were visually inspected for cultural materials but not tested. The shovel tests measured approximately 30 centimeters in diameter and were excavated to depths that were no longer considered to have the potential of containing non-random artifact bearing matrices".

Subsequently, a more recent Phase 1 Archaeological Survey was performed for the RDJ Racetrack on March 29, 2018. Again, a literature review and records search were conducted of readily available followed by implementation of a design driven by systematic and purposive sampling via shovel tests throughout the site. According to the reports provided "No potentially significant cultural resources were identified during the course of our Survey". The existing developed property was found to have been extensively modified by grading during various episodes of development. The additional areas to be developed to the east of the racetrack were also found to be disturbed. The 15-acre tract to the East of the project site was surveyed in 2011 by Soltec International Inc. and resulted in similar findings of no potential significant cultural resources present on that particular 15-acre tract of land. However, in the course of the site development if any such resources are encountered work will stop immediately and the Virgin Islands State Historical Preservation Office (SHPO) will be contacted. See the complete details of both Archaeological Studies provided as part of the CZM major application package.

A historical survey for the area is provided in **Appendix L**.

3.3 SAFE DRINKING WATER ACT UNDERGROUND INJECTION CONTROL REQUIREMENTS

None of the following controls will be installed at the project site related to construction of the RDJ Racetrack Stadium and Casino.

- Infiltration trenches (if stormwater is directed to any bored, drilled, driven shaft or dug hole that is deeper than its widest surface dimension, or has a subsurface fluid distribution system)
- Commercially manufactured pre-cast or pre-built proprietary subsurface detention vaults, chambers, or other devices designed to capture and infiltrate stormwater flow
- Drywells, seepage pits, or improved sinkholes (if stormwater is directed to any bored, drilled, driven shaft or dug hole that is deeper than its widest surface dimension, or has a subsurface fluid distribution system)

SECTION 4: EROSION AND SEDIMENT CONTROLS

The objectives of soil erosion and sediment controls are to minimize the release of solids and sediments in stormwater runoff. This will be accomplished through both structural and nonstructural controls. This section of the SWPPP describes erosion and sediment controls to be utilized at the active construction site to minimize possible impacts to stormwater runoff resulting from sediment. The proposed erosion and sediment control mechanisms include:

- Construction entrance/exit,
- Installation of project perimeter silt fences,
- Construction Berms,
- Installation of Concrete Washout,
- Installation of swales, catchment areas, and check dams,
- Temporary seeding/vegetation of areas, and
- Permanent vegetation of exposed soils at the end of construction.

These efforts will minimize erosion and sedimentation during construction and restore a permanent vegetative cover to the construction site once construction activities have been completed. The temporary erosion and sediment control measures installed during construction will be removed only after these final construction activities have been completed and the final vegetative cover has been established.

4.1 NATURAL BUFFERS OR EQUIVALENT SEDIMENT CONTROLS

The closest water of the USVI is within the project area, with a freshwater emergent wetland on the property and estuarine and marine wetland on either side of the property to the southwest and southeast.

Water flow onto the site from upstream sources in this watershed is minimal, as the Airport property drains to large culverts that discharge to the Bethlehem Gut. Since there are surface waters located within 50-feet of the construction activities, natural buffers are required.

A large sedimentation pond will be installed to catch all stormwater and potential sediment from the site, acting as an equivalent control to a natural 50-foot buffer.

Additionally, silt fencing will be installed along areas with earth disturbance to contain sediment runoff.

4.2 PERIMETER CONTROLS

Silt fences will be installed as erosion perimeter controls. Silt fences are temporary measures for sedimentation control. At the RDJ Racetrack Stadium and Casino construction site, silt fences will be installed along the perimeter of the site and in portions downslope of disturbed areas. Run-on of non-contact storm water from undisturbed portions of the property will be diverted away from the disturbed areas, and run-on from the contributing watershed upstream will be routed through the East stormwater pond and around the main project site.

Throughout all phases of construction, the fencing and ponds will be routinely inspected, cleaned, repaired, and replaced as necessary. The fencing and ponds will be installed at the start of site clearing

and prior to major earth disturbance activities including the interim site grading and stabilization work. The fencing will remain in place until the groundcover or pavement is established and the soils are stabilized.

Reinforced silt fencing details and proposed stormwater ponds are shown in **Appendix N**.

Installation:

Pre-Construction and Construction phase

Maintenance Requirements:

SILT FENCE

Silt fences help preserve and protect water quality in streams, rivers & lakes, and oceans that may be otherwise be polluted from sediment during construction work. In order to function optimally, silt fences require routine inspection at regular intervals during usage. Regular maintenance ensures the fence is intact and working to effectively control silt and sediment. Typical maintenance activities will consist of the following:

Check for straining due to increased sediment accumulation and remove sediment from any mobilization affected areas - this decreases tension, extends the life of the fence, and increases its ability to function properly.

Inspection will be performed every 14-days or after any rain event greater than 0.25-inch within 24-hours to observe any erosion or sediment loss.

Look for gaps and tears along the fence. If any are found, replace and/or repair the fabric to ensure the fence remains in good working condition.

Once sediment level reaches one quarter to one third the height of the fence, it should be removed. Additionally, sediment must be removed when the silt fence itself is removed after completion of the job.

STORMWATER PONDS

Stormwater ponds act as sediment catchment basins, allowing for detention or retention of stormwater long enough to settle out the majority of sediment from the water. The stormwater ponds will be installed pre-construction but will remain as permanent structures for long-term stormwater control devices.

These ponds will be installed and contoured with long-term conditions in mind but will be monitored and maintained throughout the construction phase. As sediment is captured and collected, it will be removed from the pond before exceeding the maximum 40% capacity of the ponds.

The ponds will be inspected as part of the routine stormwater inspections conducted at the site and will be checked for erosion in the form of gullies or rilling. Any damage to the pond walls or base will be corrected to allow for proper functioning throughout the construction phase and to perform final vegetative stabilization in the post-construction phase for long-term use.

4.3 SEDIMENT TRACK-OUT

Vehicle tracking BMPs are installed at all construction sites where there is a risk of mud and soil clinging to vehicles leaving the site. This sediment can create safety hazards and contribute significantly to sediment pollution in waterways. The purpose of a vehicle tracking BMP is to prevent soil and mud on work vehicles from being carried offsite and deposited on public roads, parking lots, and other areas. Temporary site entrances/exits are used during the construction period, prior to the time when roadways, parking lots, and other areas are either paved or stabilized. Vehicle tracking BMPs limit the amount of sediment and other pollutants leaving the construction site and reduces discharge of sediment and pollutants to surface waters. Pollutant removal is primarily accomplished through the removal of soil and mud from construction equipment, including nutrients and heavy metals that are associated with sediment. Sediment Track-out details are shown in **Appendix N**.

Specific Track-Out Controls

Track-Out Control # 1

CONSTRUCTION ENTRANCE

Track-Out Control Description

- Temporary stone-stabilized pad with a non-woven geotextile fabric underlining, 20 foot wide by 50 foot long, designed in accordance with the 2002 VIEPH.

Installation

- Pre-Construction Mobilization, Day 1-7

Maintenance Requirements

- Where sediment has been tracked-out from the construction site onto the surface of off-site streets, other paved areas, and sidewalks, deposited sediment must be removed by the end of the same workday in which the track-out occurs or by the end of the next workday if track-out occurs on a non-workday. Sediments must be removed in the track-out by sweeping, shoveling, or vacuuming these surfaces, or by using other similarly effective means of sediment removal. Sediments are prohibited from being hosed or swept off into any stormwater conveyance.

Specific Track-Out Controls

Track-Out Control # 2

VEHICLE WASH STATION (AS NEEDED)

Track-Out Control Description

- Power-washer with tote for washing tires and underbody of trucks as needed. Used on days when construction entrance alone does not remove adequate material from vehicles or equipment.

Installation

- Pre-Construction Mobilization, Day 1-7

Maintenance Requirements

- None. Maintain water availability as required.

4.4 STOCKPILED SEDIMENT OR SOIL

As grading, soil movement and excavation commence, stockpiles of various types of soil may be required. This will include topsoil, caliche or trucked-on aggregate, depending on the construction schedule.

Specific Stockpile Controls

Stockpile Control # 1

SILT FENCING AT TOE OF STOCKPILE

Installation

- Prior to stockpile storage activities, install silt fencing in accordance with 2002 VIEPH, along down slope side of stockpile.

Maintenance Requirements

- As detailed in Section 4.2

4.5 MINIMIZE DUST

Wind erosion will be controlled on the project site by employing the methods stipulated in the Best Management Practices detail in **Appendix M**.

Dust controls reduce the surface and air transport of dust, thereby preventing pollutants from infiltrating into stormwater. Control measures are often instituted in construction areas where land is being disturbed.

Dust control measures for construction activities include windbreaks, minimization of soil disturbance, and water spraying. There are a number of options for long-term dust control, such as covering exposed areas with vegetation, stone or concrete.

Specific Dust Controls

Dust Control # 1

WET SUPPRESSION OF FUGITIVE DUST USING WATER TRUCK

Dust Control Description

- Water truck with gravity drain sprinkler to apply water to areas with high dust activity and traffic.

Installation

- Pre-Construction mobilization phase

Maintenance Requirements

- Monitor fugitive dust and rewet areas as needed.

4.6 MINIMIZE THE DISTURBANCE OF STEEP SLOPES

There will be specific engineering controls implemented to minimize the disturbance of steep slopes on site. Steep slopes are anticipated only for proposed stormwater BMPs such as the ponds and swales. Stability of swales and ponds will be monitored as they are built up to the design 3:1 or 2:1 slope and additional temporary stabilizing BMPs may be used as needed to maintain the slope. Adjustments to elevations will be done in 6-12-inch lifts of material, compacting and contouring according to the drawing specifications in order to ensure steeper slopes have stability while being prepared for permanent stabilization (i.e. vegetation, riprap, etc.).

4.7 TOPSOIL

Topsoil and site disturbances will be minimized or staggered during construction. Areas with topsoil will have material segregated, stockpiled and stabilized for use in permanent vegetation after areas achieve final grade.

4.8 SOIL COMPACTION

Appropriate soil material will be used for building foundations, parking lots and other civil structures. Upon achievement of grade, slope, and elevation, structures will be constructed as designed. Each area designated for earth change or construction will be stabilized with topsoil and/or mulch within 14 days of achieving final contours, and re-vegetated to ensure no exposed soil remains for any extended period of time.

Parking lot areas will be compacted to achieve their final grade, and paved with porous pavers, asphalt or concrete as designed to provide for final stabilization.

4.9 STORM DRAIN INLETS

Inlet protection devices intercept and/or filter sediment before it can be transported from a site into the storm drain system and discharged into a lake, river, stream, wetland, or other waterbody. These devices also keep sediment from filling or clogging storm drainpipes, ditches, and downgradient sediment traps or ponds. Inlet protection may also include placement of a barrier to create a bypass of an inlet transferring flow downstream to a sediment trap, basin, or other inlet discharging to a non-critical area.

As the project constructs permanent stormwater drain inlets to tie in culverts and catchment basins, inlet protection devices will be installed to filter sediment to prevent inundation of material into the new culverts. Rerouting of stormwater directly to stormwater basins will be done as much as feasible as the inlets are installed and surface grading is finalized to drain to these for long-term use.

An Erosion and Sediment Control detail is shown in **Appendix N**.

4.10 CONSTRUCTED STORMWATER CONVEYANCE CHANNELS

Stormwater Conveyances serve to prevent scour and erosion and can provide water quality treatment while conveying stormwater. They are constructed trapezoidal channels lined with vegetation that inhibits erosion. From a water quality perspective, they are preferable to pipes because they allow more soil/water contact and more opportunity for infiltration. There are three types of vegetated conveyances: Dry Swales, Wet Swales, and Step Pool Conveyance Swales.

Dry Swales are the only type of stormwater conveyance channels proposed for this project. Dry Swales are open vegetated channels or depressions explicitly designed to detain and promote filtration of stormwater runoff into an underlying fabricated soil matrix, while transporting excess stormwater to detention basins, ponds or other containment BMPs.

As site grading and final contours are established, dry swales will be used to convey stormwater to constructed ponds and will be stabilized and vegetated after achieving final elevations.

Riprap will be used to reinforce areas that concentrate and channelize stormwater flow, as well as create check dams to slow and contain stormwater sediment during construction.

Specific Conveyance Channel Controls

CHECK DAM

Installation

□ After installation of typical storm conveyance channel, riprap with 2-3" diameter stone is placed in strategic locations within swales, to provide slow down of flow and increased settlement of fine particles. Perpendicular placement of riprap berm within swale, to height of 1/3 to 1/2 of swale height.

Maintenance Requirements

□ Where sediment has accumulated on the stone berm, settled material is removed and taken to stockpiles is required to provide drainage while still providing filtering capacity. Removal of material is required when accumulated sediment reaches 40% capacity.

4.11 CHEMICAL TREATMENT

Some construction sites require chemical treatment of collected stormwater runoff. This treatment usually consists of the addition of flocculant to remove suspended solids prior to discharge.

There will be no chemical treatment of stormwater runoff in connection with this project.

4.12 DEWATERING PRACTICES

Due to typical groundwater levels in the area being below anticipated footing and foundation work elevations, groundwater is not expected to be encountered during construction activities. However, in the case of groundwater being encountered while trenching or digging, or collection of stormwater in foundation excavation areas after heavy rain events, dewatering may be performed in order to continue construction work.

Dewatering will discharge to the constructed sedimentation ponds onsite, before discharging downstream outside project boundaries, allowing for further settling of sediment.

4.13 OTHER STORMWATER CONTROLS

No other stormwater controls will be employed at the project site. An Erosion and Sediment Control Plan is shown in **Appendix N**.

4.14 SITE STABILIZATION

Stabilization measures, such as temporary seeding, must be initiated as soon as practicable in areas where construction activities have stopped for more than 14 days or as otherwise noted on site preparation drawings. Where initiation of stabilization measures by the 14th day is prevented by inclement weather, stabilization should be initiated as soon as practicable.

Seed should be broadcast (cyclone seeder, rotary spreader, drop-type spreader, drill, or hydroseeder) uniformly on a firm seedbed and covered to the recommended depth.

Stabilization of any exposed soil that has achieved final grade or slope will be performed as required by the VI CGP timetable. This will include any areas that will not be overlaid with liner material, which will include outer berm walls and berm top. After compaction of all needed fill material, and a grade survey is completed to confirm final grade, seed will be applied and vegetation will be carefully observed until growth of a full vegetated layer has taken root.

Site Stabilization Practice

Vegetative Non-Vegetative
 Temporary Permanent

Description of Practice:

- Manual application of grass seed native to the project area

Installation:

- As required based on areas that achieve final grade. Within 14 days following completion of final elevations and contours.

Maintenance Requirements:

- Inspection will be performed every 14-days or after any rain event greater than 0.25-inch within 24-hours to observe any erosion or sediment loss. Any evidence of gulying will be addressed within 7-days to ensure final stabilization of the entire LEP area is achieved.

SECTION 5: POLLUTION PREVENTION STANDARDS

5.1 POTENTIAL SOURCES OF POLLUTION

Construction activities that will serve as potential sources of pollution to stormwater consist of the following:

- Solids and sediments resulting from erosion of areas cleared of vegetation and stockpiles;
- Oil and grease leaking from construction equipment or spilling from diesel and other fuel tanks;
- Organics from spills or leaks from lubricants and other materials used on site in the construction operations;
- Paint spills or leaks from stored containers or painting operations performed on site; and
- Trash and debris from clearing activities, construction materials and workers.

Debris from laydown areas, residue from equipment cleaning and maintenance, and solid waste generated from land clearing operations and human activity (trees, brush, paper trash, etc.) present other possible pollution sources within the construction site.

Additional pollution prevention maintenance requirements are stipulated in the BMPs in **Appendix M**.

Construction Site Pollutants

Pollutant-Generating Activity	Pollutants or Pollutant Constituents (that could be discharged if exposed to stormwater)	Location on Site (or reference SWPPP site map where this is shown)
Grading, trenching and other Earth-work	Suspended sediments	Entire southern portion of Property noted on SWPPP Site Map
Truck Refueling Area	Petroleum, oil & grease	Primary Staging area noted on SWPPP Site Map
Concrete Work	Concrete wash water	Concrete Washout BMP on SWPPP Site Map
Chemicals & Materials Storage	Solvents, lubricants, form release agents, paint, miscellaneous construction chemicals	Primary Staging area noted on SWPPP Site Map

5.2 SPILL PREVENTION AND RESPONSE

The following spill prevention practices will be implemented to reduce risk of spills or other accidental exposure of materials and substances from stormwater runoff:

1.) Good Housekeeping

- a. **Daily inspection of project area for proper material storage, use and disposal**
- b. **Store only enough material onsite for project completion**
- c. **All substances shall be used before disposal of container**
- d. **All construction materials stored shall be organized in the proper container**
- e. **Products shall not be mixed unless directed by manufacturer**
- f. **All products shall be used and disposed of according to the manufacturer's recommendations**

2.) Hazardous Products

- a. **Materials should be kept in original containers with labels unless original containers cannot be resealed. If original containers cannot be used, labels and product information shall be saved.**
- b. **Proper disposal practices shall always be followed in accordance with manufacturer and local waste handling regulations.**

3.) Product Specific Practices

- a. **Petroleum products must be stored in proper containers and clearly labeled. Vehicles containing petroleum products shall be routinely inspected for leaks. Precautions shall be taken to avoid leakage of petroleum products onsite.**
- b. **Concrete trucks must wash out chutes and discharge surplus concrete in appropriate concrete wash out.**

Further detail on specific spill prevention controls is shown in detail in **Appendix M** and **Appendix N**.

VIGL Operations will minimize stormwater exposure to sediment material handling locations in order to minimize the potential for spills in these areas to impact stormwater runoff leaving the site. Minimization and prevention methods employed at the facility include:

Required Measures	Description of Implementation
-Barriers between material storage and traffic areas -Secondary containment provisions, and -Procedures for material storage and handling.	-Installation of silt fencing or temporary berms around material handling and storage areas to contain a spill -Use of concrete washouts to clean cement truck chutes -Conex trailers for storage of chemicals and materials -Grading to direct stormwater runoff to stormwater ponds before discharge from the site -Use of drip pans and absorbents for incidental leaks from construction equipment -Use of truck washing BMPs and temporary construction entrance to reduce sediment tracking off-site

Any spills will be immediately cleaned up, and contaminated soil will be put into approved containers for eventual disposal by a licensed waste handler.

VIGL Operations will implement the following required spill response measures to minimize stormwater impacts from potential leaks, spills, and other releases:

Required Measures	Description of Implementation
Procedures for: -Expediently stopping, containing, and cleaning up leaks, spills, and other releases.	-Spill kit will be kept onsite near any designated fueling and storage areas -Employees who may cause, detect, or respond to a spill or leak must be trained in these procedures and have necessary spill response PPE available -Construction worker training and familiarization of this plan

5.3 FUELING AND MAINTENANCE OF EQUIPMENT OR VEHICLES

Equipment/vehicle fueling and maintenance practices will be implemented to eliminate the discharge of spilled or leaked chemicals.

- Fueling of construction equipment will be done on a designated area with nearby spill kits available for active secondary containment and spill response.

5.4 WASHING OF EQUIPMENT AND VEHICLES

Equipment/vehicle washing will occur on an as-needed basis. To prevent off-site tracking of sediment, a power-washer with tote for washing of tires and underbody of trucks will be installed adjacent to the staging areas, on concrete, for control of water collection. No soaps, detergents or other chemicals will be used in the wash station.

5.5 STORAGE, HANDLING, AND DISPOSAL OF CONSTRUCTION PRODUCTS, MATERIALS, AND WASTES

5.5.1 *Building Products*

Building product such as adhesives, concrete admixtures and other chemicals will be stored in Conex Trailers and taken out only when required for use. Used containers or excess product disposed of in a waste container will be contained in the containers and ensured to not leak excess material into or around waste bins.

5.5.2 *Pesticides, Herbicides, Insecticides, Fertilizers, and Landscape Materials*

No pesticides, herbicides, insecticides, fertilizers, or other landscape materials are anticipated to be used as part of this project. Revegetation is anticipated to require only watering of planted seed.

5.5.3 Diesel Fuel, Oil, Hydraulic Fluids, Other Petroleum Products, and Other Chemicals

There will be a mobile fueling truck with an approximately 250-gallon tank located on the project-site for equipment refueling services. The tank will be on the truck bed and a spill kit will also be located adjacent to the tank. Since oil capacity will be less than 1,320-gallons, a Spill Prevention Countermeasures Control Plan will not be required under 40 CFR Part 112.

Specific Pollution Prevention Practices

Pollution Prevention Practice # 1

MATERIAL STAGING AREA

Description

- Material Staging Area (shown in the SWPPP Site maps in **Appendix A**) will be utilized to park fuel truck and tank and associated secondary containment and spill kit. Pollution Prevention methods for the Material Staging Area is discussed further in Section 5.5.5.

Installation

- Pre-Construction Mobilization Phase

Maintenance Requirements

- Inspection will be performed every 14-days or after any rain event greater than 0.25-inch within 24-hours. Visual inspections of staging areas, trailers, secondary containment and spill kit will be performed in conjunction with routine SWPPP inspections. Any open containers, containers outside covered storage areas, spills, waste or other materials that may contaminate storm water will be cleaned up and put away.

5.5.4 Hazardous or Toxic Waste

No hazardous waste will be generated onsite. Any unused or contaminated chemicals or materials, including oily rags, will be disposed of in accordance with Resource Conservation and Recovery Act (RCRA) and in accordance with 40 CFR Part 261 waste handling regulations.

5.5.5 Construction and Domestic Waste

All waste materials will be collected and stored in metal dumpsters or roll-on roll-off bins in accordance with Territorial regulations. All trash and construction debris from the site will be deposited in the appointed container and the Contractor will have the container emptied routinely when full and properly disposed of. The Contractor will also be responsible for enforcing and training workers to properly dispose of waste products in the appropriate container. Rubbish, trash, garbage, litter or other such materials will be deposited into these containers. Materials will be prevented from leaving the project site through the action of wind or stormwater discharge into drainage ditches or waters of the territory. Additional details are found in the BMPs shown in **Appendix M** and the Erosion and Sediment Control detail shown in **Appendix N**.

Typical construction-related wastes consist of the following: packaging materials, scrap construction materials, masonry products, timber, pipe and electrical cuttings, plastics, Styrofoam and, other trash or building materials.

During construction, domestic and construction-related wastes will be managed with onsite storage bins (i.e. 20-cubic yard roll-off bins). These bins will be trucked off-site by a licensed waste transporter as necessary and disposed of in accordance with USVI solid waste disposal requirements.

Specific Pollution Prevention Practices

Pollution Prevention Practice # 1

WASTE BIN AREA

Description

- A Waste Bin Area will be designated to manage roll-on roll-off 20-yard waste bins for generated solid waste.

Installation

- Pre-Construction Mobilization Phase

Maintenance Requirements

- Visual inspection in conjunction with SWPPP inspection processes, once every 14-days and/or after storm events greater than 0.25-inch within 24-hours.
- Any spilled waste, evidence of holes or leaking containers will require cleanup immediately and replacement of waste bins.

5.5.6 Sanitary Waste

Project sewage management will be limited to maintaining portable restrooms onsite, and ensuring they are emptied by a qualified waste management company at an appropriate frequency to minimize spills or discharges from the site.

5.6 WASHING OF APPLICATORS AND CONTAINERS USED FOR PAINT, CONCRETE OR OTHER MATERIALS

No washing of applicators or containers used for paint or other liquids will be performed as part of this project. A concrete washout will be installed when required for concrete work to install fence poles, spillway features, or sprayer anchors to prevent concrete washout from being spilled on the ground.

5.7 FERTILIZERS

Revegetation will consist of manual application of Bermuda Grass seed. Mulch mixed with topsoil will be used as soil amendments to enhance re-vegetative efforts and will not degrade stormwater quality from the project site. No additional NKP (Nitrogen, Potassium, Phosphorus) soil amendments will be applied.

5.8 OTHER POLLUTION PREVENTION PRACTICES

No other pollution prevention practices will be employed at the project site.

SECTION 6: INSPECTION AND CORRECTIVE ACTION

6.1 INSPECTION PERSONNEL AND PROCEDURES

A qualified professional familiar with this SWPPP and TPDES stormwater management requirements will conduct the inspections. At a minimum, inspections will cover at least the following areas of the construction site:

- Disturbed areas without stabilization;
- Material storage areas;
- Silt fences;
- Concrete washout;
- Stockpiles;
- Ditches, swales, ponds and other stormwater conveyance structures;
- Final offsite discharge locations (outfalls); and
- Construction entrance/exit.

If defects or damage are noted in the measures, the defect or damage will be immediately reported or repaired. If the measures prove to be inadequate to control erosion, changes will be made to the design and additional measures will be added as necessary.

Accumulated sediment will be removed before it reaches 40% of the height of the silt fencing, pond capacity, or storm inlet protection height. Worn, torn or otherwise damaged silt fencing will be repaired or replaced. The site will be cleaned on a daily basis of litter, debris, and material such as paper, wood concrete, etc.

Personnel Responsible for Inspections

All personnel conducting inspections must be considered a "qualified person." VI CGP Part 4.1.1 clarifies that a "qualified person" is a person knowledgeable in the principles and practices of erosion and sediment controls and pollution prevention, who possesses the skills to assess conditions at the construction site that could impact stormwater quality, and the skills to assess the effectiveness of any stormwater controls selected and installed to meet the requirements of this permit.

For this project, that includes the following personnel:

Fred Bible
Eleven Construction LLC
Project Manager
918-520-3999
fbible@eleven.vi

Benjamin Keularts
Tysam Tech, LLC
SWPPP Consultant
340-514-1888
Benjamin.keularts@tysamtech.com

Inspection Schedule

Inspections will occur bi-weekly and/or within 24-hours of any storm event of at least 0.25-inches of rainfall.

Rain Gauge Location

Rainfall amounts will be measured using the NOAA weather station located at the Henry E. Rohlsen Airport (HERA), approximately 0.6 miles to the Northwest of the project area.

Inspection Report Forms

Provided in **Appendix D**.

6.2 CORRECTIVE ACTION

Spill cleanup and routine maintenance requirements for specific erosion and sediment control BMPs are specified within **Appendix M**. Repairs/adjustments will be made promptly to any erosion and sedimentation control BMPs found to be deficient or performing inadequately. Some routine maintenance operations that may be performed during the construction phase of the project include:

- Removal of sediment from silt fence at 40% the height of the installed silt fence.
- Removal of sediment from Check Dams and stormwater inlet protection at 40% height of berm.
- Daily scraping/sweeping/watering, as applicable, of sedimentation on the road at temporary construction entrance/exit location.
- Sediment removal from the Stormwater retention basin during construction at 50% volume reduction of original storage capacity.

Personnel Responsible for Ensuring Corrective Action is Completed

Fred Bible
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Project Manager
918-520-3999
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Benjamin Keularts
Tysam Tech, LLC
SWPPP Consultant
340-514-1888
Benjamin.keularts@tysamtech.com

Corrective Action Forms

Included in **Appendix E**.

6.3 DELEGATION OF AUTHORITY

Duly Authorized Representative(s) or Position(s):

SWPPP Contact	Primary Contractor
Benjamin Keularts	Fred Bible
Tysam Tech LLC	Eleven Construction LLC
SWPPP Consultant	Project Manager
(340) 514-1888	918-520-3999
Benjamin.keularts@tysamtech.com	fbible@eleven.vi

SECTION 8: CERTIFICATION AND NOTIFICATION

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 gathered and evaluated 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.

Name: Andrew Dubuque Title: CFO-Managing Partner, VIGL Operations, LLC

Signature: _____ Date: _____

Name: Fred Bible Title: Project Manager – Eleven Construction, LLC

Signature: _____ Date: _____