

Inspection Report for North Sturbridge Road Solar Facility

NPDES ID No.: MAR10031G

Inspection Date: 09/02/2021

General Information					
Weather conditions during inspection	73* F, Partly Cloudy	Inspection start time	3:10 PM	Inspection end time	3:50 PM
Inspector Name, Title & Contact Information	Stephen Borgatti, PE, Engineer (BETA Group, Inc.) sborgatti@beta-inc.com (781)-255-1982				
Present Phase of Construction	Phase 1. NOTE: The access road and stabilized construction entrance has been established pursuant to the Phase 1 scope of work. However, the entirety of the Site has been cleared of trees. No grubbing/stumping has occurred other than that required to establish the Site access road.				
Inspection Location	North Sturbridge Road Solar Facility – Entirety of Site (0 North Sturbridge Road, Charlton, MA 01507)				
Inspection Frequency (Note: you may be subject to different inspection frequencies in different areas of the site. Check all that apply) Standard Frequency: <input type="checkbox"/> Every 7 days <input checked="" type="checkbox"/> Every 14 days and within 24 hours of a 0.25" rain or the occurrence of runoff from snowmelt sufficient to cause a discharge Increased Frequency: <input type="checkbox"/> Every 7 days and within 24 hours of a 0.25" rain (for areas of sites discharging to sediment or nutrient-impaired waters or to waters designated as Tier 2, Tier 2.5, or Tier 3) Reduced Frequency: <input type="checkbox"/> Twice during first month, no more than 14 calendar days apart; then once per month after first month; (for stabilized areas) <input type="checkbox"/> Twice during first month, no more than 14 calendar days apart; then once more within 24 hours of a 0.25" rain (for stabilized areas on "linear construction sites") <input type="checkbox"/> Once per month and within 24 hours of a 0.25" rain (for arid, semi-arid, or drought-stricken areas during seasonally dry periods or during drought) <input type="checkbox"/> Once per month (for frozen conditions where earth-disturbing activities are being conducted)					
Was this inspection triggered by a 0.25" storm event? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, how did you determined whether a 0.25" storm event has occurred? <input type="checkbox"/> Rain gauge on site <input checked="" type="checkbox"/> Weather station representative of site. Specify weather station source: Worcester Regional Airport Total rainfall amount that triggered the inspection (inches): 5.6" Was this inspection triggered by the occurrence of runoff from snowmelt sufficient to cause a discharge? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					

Unsafe Conditions for Inspection

Did you determine that any portion of your site was unsafe for inspection per CGP Part 4.1.5? Yes No

If "yes", complete the following:

- Describe the conditions that prevented you from conducting the inspection in this location: N/A
- Location where conditions were found: N/A

Condition and Effectiveness of Erosion and Sediment (E&S) Controls (CGP Part 2.2)

Type/Location of E&S Control	Maintenance Needed?*	Corrective Action Required?*	Date on Which Maintenance or Corrective Action First Identified?	Notes
1. Silt Fence and Straw Wattles	Yes (As of 9/2/2021)	No	9/2/2021	<p>A breach was observed at Discharge 2. Although the double row of straw bales is intact, silt fence was observed to be knocked over and signs of stormwater flow were detected in the area beyond the fence.</p> <p>A minor tear was identified in a section of silt fence on the southern side of the Site with no erosion observed.</p> <p>Minor degradation of a straw wattle was observed on the southeastern side of the Site; no erosion was observed but pools of water were found to be forming behind the straw wattle</p>
2. Stabilized Construction Entrance (Site Entrance – Access Road)	No (As of 9/2/2021)	No		Hydroseed was applied to exposed soil in this area and continues to germinate.
3. Stump and Soil Stockpile Area	No (As of 7/22/2021)	No		
4. Dust Controls	N/A	N/A		
5. Jute Mesh (Steep Slopes)	N/A	N/A		
6. Temporary Seeding	No (As of 9/3/2021)	No	7/22/2021	Hydroseed has been applied to the earthen access road and hand-application of seed was performed within the area beyond the limit of work that was subjected to Discharge 1. Germination was

			8/24/2021	observed within areas of disturbed soils within the limits of work; however, little to no germination was observed within the disturbed area downgradient of the limit of work. Additional seed should be hand-applied in this area. The areas downgradient of Discharges 1 and 2 have been stabilized with straw and seed. These areas will be monitored for germination and stabilization.
7. Topsoil Re-Use	N/A	N/A		
8. Storm Drain Inlets (North Brookfield Road)	N/A	N/A		
9. Temporary Drainage Swales (Throughout Site)	N/A	N/A		
10. Temporary Sediment Basins (Throughout Site)	N/A	N/A		

Condition and Effectiveness of Pollution Prevention (P2) Practices (CGP Part 2.3)

Type/Location of P2 Practices [insert additional rows if applicable]	Maintenance Needed?*	Corrective Action Required?*	Date on Which Maintenance or Corrective Action First Identified?	Notes
1. Equipment Refueling Staging Area	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	[Enter date]	
2. Hydraulic Lines Staging/Work Areas	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	[Enter date]	
3. Equipment Maintenance Staging Area	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	[Enter date]	
4. Sanitary Toilets Staging Area	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	[Enter date]	
5. Vehicle Accident Entire Site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	[Enter date]	
6. Dumpsters Staging Area	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	[Enter date]	
7. Solar Panel Installation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	[Enter date]	

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Staging/Work Areas				
8. Concrete Washout	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	[Enter date]	

* Note: The permit differentiates between conditions requiring routine maintenance, and those requiring corrective action. The permit requires maintenance in order to keep controls in effective operating condition. Corrective actions are triggered only for specific conditions, which include: 1) A stormwater control needs repair or replacement (beyond routine maintenance) if it is not operating as intended; 2) A stormwater control necessary to comply with the permit was never installed or was installed incorrectly; 3) You become aware that the stormwater controls you have installed and are maintaining are not effective enough for the discharge to meet applicable water quality standards or applicable requirements in Part 3.1; 4) One of the prohibited discharges in Part 1.3 is occurring or has occurred; or 5) EPA requires corrective actions as a result of a permit violation found during an inspection carried out under Part 4.8. If a condition on your site requires a corrective action, you must also fill out a corrective action form found at <https://www.epa.gov/npdes/stormwater-discharges-construction-activities#resources>. See Part 5 of the permit for more information.

Stabilization of Exposed Soil (CGP Part 2.2.14)			
Stabilization Area [insert additional rows if applicable]	Stabilization Method	Have You Initiated Stabilization?	Notes
1. Earthen access road leading to stockpile area	Straw mulch or hydroseed	<input checked="" type="checkbox"/> Yes 7/30/2021 <input type="checkbox"/> No	The stockpile area and associated access road have been hydroseeded. Germination has begun and the area will be monitored for successful establishment.
2. Informal access road along northern portion of the Site	Straw mulch or hydroseed	<input type="checkbox"/> Yes [Enter date] <input checked="" type="checkbox"/> No	Erosion channels are beginning to form within upgradient portions of the informal access road (Figure 1). The contractor indicated that stabilization by smoothing out soils and seeding or spreading mulch would occur on 7/30/2021. Stabilization of this area has not been initiated. After inspection of the area on 8/24/2021, it was determined that

<p>3. Area beyond the limits of work at Discharge 1</p> <p>4. Area beyond limits of work at Discharge 2</p>	<p>Hand application of seed</p> <p>Hand application of seed</p>	<p><input checked="" type="checkbox"/> Yes 8/24/2021 <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes Enter Date <input checked="" type="checkbox"/> No</p>	<p>temporary swales would likely alleviate the issue of channelization in this area; however, these swales will not be constructed until work resumes at the Site in October (pending local approval). This area will continue to be monitored; however, stabilization is not required since the area is not discharging sediment beyond the limits of work.</p> <p>The sediment deposit previously observed has been removed from beyond the limits of work and the area has been seeded. No sediment migrated within 50 feet of a "water of the US". Straw and additional seed was applied on 8/24/2021 and will be monitored for successful establishment.</p> <p>Stabilization required</p>
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Description of Discharges (CGP Part 4.6.6)	
<p>Was a stormwater discharge or other discharge occurring from any part of your site at the time of the inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "yes", provide the following information for each point of discharge:</p>	
Discharge Location	Observations
<p>Discharge 2</p>	<p>Describe the discharge: Breach in silt fence allowed runoff to bypass erosion controls.</p> <p>At points of discharge and the channels and banks of surface waters in the immediate vicinity, are there any visible signs of erosion and/or sediment accumulation that can be attributed to your discharge? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, describe what you see, specify the location(s) where these conditions were found, and indicate whether modification, maintenance, or corrective action is needed to resolve the issue: Small areas of bare soil observed in area immediately beyond perimeter controls. Repairs to erosion controls and re-seeding of damaged areas is required.</p>

Contractor or Subcontractor Signature and Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly 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 have no personal knowledge that the information submitted is other than 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."

Signature of Contractor or Subcontractor: _____ Date:

Printed Name and Affiliation: _____

Operator Signature and Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly 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 have no personal knowledge that the information submitted is other than 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."

Signature of Operator or "Duly Authorized Representative": _____ Date:

Printed Name and Affiliation: _____

Instructions for Filling Out "General Information" Section on Page 1

Weather Conditions During Inspection

Enter the weather conditions occurring during the inspection, e.g., sunny, overcast, light rain, heavy rain, snowing, icy, windy.

Inspection start and end times

Enter the time you started and ended the inspection.

Inspector Name, Title & Contact Information

Provide the name of the person(s) (either a member of your company's staff or a contractor or subcontractor) that conducted this inspection. Provide the inspector's name, title, and contact information as directed in the form.

Present Phase of Construction

If this project is being completed in more than one phase, indicate which phase it is currently in.

Inspection Location

If your project has multiple locations where you conduct separate inspections, specify the location where this inspection is being conducted. If only one inspection is conducted for your entire project, enter "Entire Site." If necessary, complete additional inspection report forms for each separate inspection location.

Inspection Frequency

Check the box that describes the inspection frequency that applies to you. Note that you may be subject to different inspection frequencies in different areas of your site. If your project does not discharge to a "sensitive water" (i.e., a water impaired for sediment or nutrients, or listed as Tier 2, 2.5, or 3 by your state or tribe) and you are not affected by any of the circumstances described in CGP Part 4.4, then you can choose your frequency based on CGP Part 4.2 – either every 7 calendar days, or every 14 calendar days and within 24 hours of a 0.25-inch storm event. For any portion of your site that discharges to a sensitive water, your inspection frequency for that area is fixed under CGP Part 4.3 at every 7calendar days and within 24 hours of a 0.25-inch storm event. If portions of your site are stabilized, are located in arid, semi-arid, or drought-stricken areas, or are subject to frozen conditions, consult CGP Part 4.4 for the applicable inspection frequency. Check all the inspection frequencies that apply to your project.

Was This Inspection Triggered by a 0.25 Inch Storm Event or the occurrence of runoff from snowmelt sufficient to cause a discharge?

If you were required to conduct this inspection because of a 0.25-inch (or greater) rain event, indicate whether you relied on an on-site rain gauge or a nearby weather station (and where the weather station is located). Also, specify the total amount of rainfall for this specific storm event. If you were required to conduct this inspection because of the occurrence of runoff from snowmelt, then check the appropriate box.

Unsafe Conditions for Inspection

Inspections are not required where a portion of the site or the entire site is subject to unsafe conditions. See CGP Part 4.5. These conditions should not regularly occur, and should not be consistently present on a site. Generally, unsafe conditions are those that render the site (or a portion of it) inaccessible or that would pose a significant probability of injury to applicable personnel. Examples could include severe storm or flood conditions, high winds, and downed electrical wires.

If your site, or a portion of it, is affected by unsafe conditions during the time of your inspection, provide a description of the conditions that prevented you from conducting the inspection and what parts of the site were affected. If the entire site was considered unsafe, specify the location as "Entire site"

Instructions for Filling Out the "Erosion and Sediment Control" Table on Page 2

Type and Location of E&S Controls

Provide a list of all erosion and sediment (E&S) controls that your SWPPP indicates will be installed and implemented at your site. This list must include at a minimum all E&S controls required by CGP Part 2.2. Include also any natural buffers established under CGP Part 2.2.1. Buffer requirements apply if your project's earth-disturbing activities will occur within 50 feet of a water of the U.S. You may group your E&S controls on your form if you have several of the same type of controls (e.g., you may group "Inlet Protection Measures", "Perimeter Controls", and "Stockpile Controls" together on one line), but if there are any problems with a specific control, you must separately identify the location of the control, whether maintenance or corrective action is necessary, and in the notes section you must describe the specifics about the problem you observed.

Maintenance Needed?

Answer "yes" if the E&S control requires maintenance due to normal wear and tear in order for the control to continue operating effectively. At a minimum, maintenance is required in the following specific instances: (1) for perimeter controls, whenever sediment has accumulated to half or more the above-ground height of the control (CGP Part 2.2.3.a); (2) where sediment has been tracked-out onto the surface of off-site streets or other paved areas (CGP Part 2.2.4); (3) for inlet protection measures, when sediment accumulates, the filter becomes clogged, and/or performance is compromised (CGP Part 2.2.10); and (4) for sediment basins, as necessary to maintain at least half of the design capacity of the basin (CGP Part 2.2.12.f). Note: In many cases, "yes" answers are expected and indicate a project with an active operation and maintenance program. You should also answer "yes" if work to fix the problem is still ongoing from the previous inspection.

Corrective Action Needed?

Answer "yes" if during your inspection you found any of the following conditions to be present (CGP, Part 5.1): (1) a required E&S control needs repair or replacement (beyond routine maintenance required under Part 2.1.4); (2) a required E&S control was never installed or was installed incorrectly; (3) you become aware that the inadequacy of the E&S control has led to an exceedance of an applicable water quality standard; (4) one of the prohibited discharges in Part 1.3 is occurring or has occurred; or (5) EPA requires corrective action for an E&S control as a result of a permit violation found during an inspection carried out under Part 4.8. If you answer "yes", you must take corrective action and complete a corrective action report, found at <https://www.epa.gov/npdes/stormwater-discharges-construction-activities#resources>. Note: You should answer "yes" if work to fix the problem from a previous inspection is still ongoing.

Date on Which Maintenance or Corrective Action First Identified?

Provide the date on which the condition that triggered the need for maintenance or corrective action was first identified. If the condition was just discovered during this inspection, enter the inspection date. If the condition is a carryover from a previous inspection, enter the original date of the condition's discovery.

Notes

For each E&S control and the area immediately surrounding it, note whether the control is properly installed and whether it appears to be working to minimize sediment discharge. Describe any problem conditions you observed such as the following, and why you think they occurred as well as actions (e.g., maintenance or corrective action) you will take or have taken to fix the problem:

1. Failure to install or to properly install a required E&S control
2. Damage or destruction to an E&S control caused by vehicles, equipment, or personnel, a storm event, or other event
3. Mud or sediment deposits found downslope from E&S controls
4. Sediment tracked out onto paved areas by vehicles leaving construction site
5. Noticeable erosion at discharge outlets or at adjacent streambanks or channels
6. Erosion of the site's sloped areas (e.g., formation of rills or gullies)
7. E&S control is no longer working due to lack of maintenance

For buffer areas, make note of whether they are marked off as required, whether there are signs of construction disturbance within the buffer, which is prohibited under the CGP, and whether there are visible signs of erosion resulting from discharges through the area.

If maintenance or corrective action is required, briefly note the reason. If maintenance or corrective action have been completed, make a note of the date it was completed and what was done. If corrective action is required, note that you will need to complete a separate corrective action report describing the condition and your work to fix the problem.

Instructions for Filling Out the "Pollution Prevention (P2) Practice" Table on Page 3

Type and Location of P2 Controls

Provide a list of all pollution prevention (P2) practices that are implemented at your site. This list must include all P2 practices required by Part 2.3, and those that are described in your SWPPP.

Maintenance Needed?

Answer "yes" if the P2 practice requires maintenance due to normal wear and tear in order for the control to continue operating effectively. Note: In many cases, "yes" answers are expected and indicate a project with an active operation and maintenance program.

Corrective Action Needed?

Answer "yes" if during your inspection you found any of the following conditions to be present (CGP, Part 5.1): (1) a required P2 practice needs repair or replacement (beyond routine maintenance required under Part 2.1.4); (2) a required P2 practice was never installed or was installed incorrectly; (3) you become aware that the inadequacy of the P2 practice has led to an exceedance of an applicable water quality standard; (4) one of the "prohibited discharges" listed in CGP Part 1.3 is occurring or has occurred, or (5) EPA requires corrective action for a P2 practice as a result of a permit violation found during an inspection carried out under Part 4.8. If you answer "yes", you must take corrective action and complete a corrective action report (see <https://www.epa.gov/npdes/stormwater-discharges-construction-activities#resources>). Note: You should answer "yes" if work to fix the problem from a previous inspection is still ongoing.

Date on Which Maintenance or Corrective Action First Identified?

Provide the date on which the condition that triggered the need for maintenance or corrective action was first identified. If the condition was just discovered during this inspection, enter the inspection date. If the condition is a carryover from a previous inspection, enter the original date of the condition's discovery.

Notes

For each P2 control and the area immediately surrounding it, note whether the control is properly installed, whether it appears to be working to minimize or eliminate pollutant discharges, and whether maintenance or corrective action is required. Describe problem conditions you observed such as the following, and why you think they occurred, as well as actions you will take or have taken to fix the problem:

1. Failure to install or to properly install a required P2 control
2. Damage or destruction to a P2 control caused by vehicles, equipment, or personnel, or a storm event
3. Evidence of a spill, leak, or other type of pollutant discharge, or failure to have properly cleaned up a previous spill, leak, or other type of pollutant discharge
4. Spill response supplies are absent, insufficient, or not where they are supposed to be located
5. Improper storage, handling, or disposal of chemicals, building materials or products, fuels, or wastes
6. P2 practice is no longer working due to lack of maintenance

If maintenance or corrective action is required, briefly note the reason. If maintenance or corrective action have been completed, make a note of the date it was completed and what was done. If corrective action is required, note that you will need to complete a separate corrective action report describing the condition and your work to fix the problem.

Instructions for Filling Out the "Stabilization of Exposed Soil" Table on Page 4

Stabilization Area

List all areas where soil stabilization is required to begin because construction work in that area has permanently stopped or temporarily stopped (i.e., work will stop for 14 or more days), and all areas where stabilization has been implemented.

Stabilization Method

For each area, specify the method of stabilization (e.g., hydroseed, sod, planted vegetation, erosion control blanket, mulch, rock).

Have You Initiated Stabilization

For each area, indicate whether stabilization has been initiated.

Notes

For each area where stabilization has been initiated, describe the progress that has been made, and what additional actions are necessary to complete stabilization. Note the effectiveness of stabilization in preventing erosion. If stabilization has been initiated but not completed, make a note of the date it is to be completed. If stabilization has been completed, make a note of the date it was completed. If stabilization has not yet been initiated, make a note of the date it is to be initiated, and the date it is to be completed.

Instructions for Filling Out the "Description of Discharges" Table on Page 4

You are only required to complete this section if a discharge is occurring at the time of the inspection.

Was a Stormwater Discharge Occurring From Any Part of Your Site At The Time of the Inspection?

During your inspection, examine all points of discharge from your site, and determine whether a discharge is occurring. If there is a discharge, answer "yes" and complete the questions below regarding the specific discharge. If there is not a discharge, answer "no" and skip to the next page.

Discharge Location (repeat as necessary if there are multiple points of discharge)

Location of discharge. Specify the location on your site where the discharge is occurring. The location may be an outlet from a stormwater control or constructed stormwater channel, a discharge into a storm sewer inlet, or a specific point on the site. Be as specific as possible; it is recommended that you refer to a precise point on your site map.

Describe the discharge. Include a specific description of any noteworthy characteristics of the discharge such as color; odor; floating, settled, or suspended solids; foam; oil sheen; and other obvious pollution indicators.

Are there visible signs of erosion or sediment accumulation? At each point of discharge and the channel and streambank in the immediate vicinity, visually assess whether there are any obvious signs of erosion and/or sediment accumulation that can be attributed to your discharge. If you answer "yes", include a description in the space provided of the erosion and sediment deposition that you have found, specify where on the site or in the water of the U.S. it is found, and indicate whether modification, maintenance, or corrective action is needed to resolve the issue.

Instructions for Signature/Certification on Page 5

Each inspection report must be signed and certified to be considered complete.

Contractor or Subcontractor Signature and Certification

Where you rely on a contractor or subcontractor to carry out the inspection and complete the inspection report, you should require the inspector to sign and certify each report. Note that this does not relieve you, the permitted operator, of the requirement to sign and certify the inspection report as well.

Operator Signature and Certification

At a minimum, the inspection report must be signed by either (1) the person who signed the NOI, or (2) a duly authorized representative of that person. The following requirements apply to scenarios (1) and (2):

If the signatory will be the person who signed the NOI for permit coverage, as a reminder, that person must be one of the following types of individuals:

- For a corporation: A responsible corporate officer. For the purpose of this subsection, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- For a partnership or sole proprietorship: A general partner or the proprietor, respectively.
- For a municipality, state, federal, or other public agency: Either a principal executive officer or ranking elected official. For purposes of this subsection, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrator of EPA).

If the signatory will be a duly authorized representative, the following requirements must be met:

- The authorization is made in writing by the person who signed the NOI (see above);
- The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and
- The signed and dated written authorization is included in the SWPPP. A copy must be submitted to EPA, if requested.