

**ADDENDUM:
Statement of Basis- Permit Minor Modification**

PERMITTEE:	United States Department of the Air Force (DoAF)
FACILITY NAME AND ADDRESS:	United States Air Force Academy (USAFA) Municipal Separate Storm Sewer System (MS4) 8120 Edgerton Drive US Air Force Academy, CO 80840
PERMIT NUMBER:	COR-042007
RESPONSIBLE OFFICIAL:	Col Ahave Brown Commander, 10 th Air Base Wing 719-333-1010 ahave.brown@us.af.mil
FACILITY CONTACT:	Dan Wilcoxon Deputy Director 10 Civil Engineering Squadron 8120 Edgerton Drive US Air Force Academy, CO 80840 719-333-2660 Daniel.Wilcoxon.2@us.af.mil
PERMIT TYPE:	Federal Facility, Municipal Separate Storm Sewer Systems, Permit Renewal
FACILITY LOCATION:	8120 Edgerton Drive US Air Force Academy, CO 80840 Latitude, Longitude: 38.9903, -104.8583
DISCHARGE LOCATION(S):	Multiple outfalls to: Smith Creek, Deadmans Creek, Monument Creek, Monument Branch, West Monument Creek, and Kettle Creek
RECEIVING WATERS:	Smith Creek, Deadmans Creek, Monument Creek, Monument Branch, West Monument Creek, and Kettle Creek

Permit and Statement of Basis (SoB) Modification Background:

The United States Air Force Academy (USAFA) has identified that prior information regarding stormwater culvert connections near per- and polyfluoroalkyl substances (PFAS) sampling Outfall 003 in their existing MS4 Permit (COR-042007) issued January 1, 2025, expiring December 31, 2029, was incorrect.

It was previously determined by USAFA that two separate culverts connected and conveyed stormwater to a single discharge point at Outfall 003 (Figure 1 below). This was again confirmed during EPA’s August 2023 inspection, in which the western culvert was obscured by vegetation (Figure 3 below) and was not identified. However, USAFA recently discovered that the culverts discharge separately at two distinct points located approximately 7 feet apart (Figure 2 below). The coordinates for the two locations are close enough that they are identical when rounded to four significant digits and are:

- Permitted Location (Eastern Culvert): 38.9744, -104.8807 (in existing permit) to 38.9744, -104.880694 (from USAFA GIS)
- Newly Identified (Western Culvert): 38.974381, -104.880711 (from USAFA GIS)

This modification will require USAFA to collect all stormwater samples for this location from the western culvert since it captures stormwater flows closer to the burn pit, which is the primary area of concern for PFAS. Based on USAFA’s interviews with base fire department personnel, PFAS was not sprayed on the concrete pads in the fire training area. PFAS was only sprayed into the burn pit areas during fire suppression training. No discrete outfall for the burn pit has been identified at this time. The original location of the eastern culvert for Outfall 003 was chosen because it was thought to be the closest location to the burn pit that had concentrated stormwater flow. However, the western culvert is closer and has been observed to have greater flow in springtime than the eastern culvert.

Given this new information, USAFA requested a modification of their permit to allow for more accurate PFAS sampling. EPA is hereby modifying the permit to require Outfall 003 be the following with the addition of “Sampling shall be conducted at the western culvert” to the below description from the existing Permit (in bold):

NPDES PFAS Monitoring Locations

Outfall 003	-104.8807	38.9744	Fire Fighting Training Area. Approximately 1,085 feet west of the intersection of West Monument Creek Road and Road 601. Sampling location is 65 feet from SW edge of Fire Fighting concrete pad with the tower. Approximately 40 feet from south edge of Road 601, just beyond the drainage rip rap. Sampling shall be conducted at the western culvert.	Fire Burn Pit, Current Fire Fighting Training Area (FTA)
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Figure 1. USAFA's stormwater system mapping. Eastern and western culverts are in green.



Figure 2. USAFA's stormwater system mapping. Eastern and western culverts are in blue.

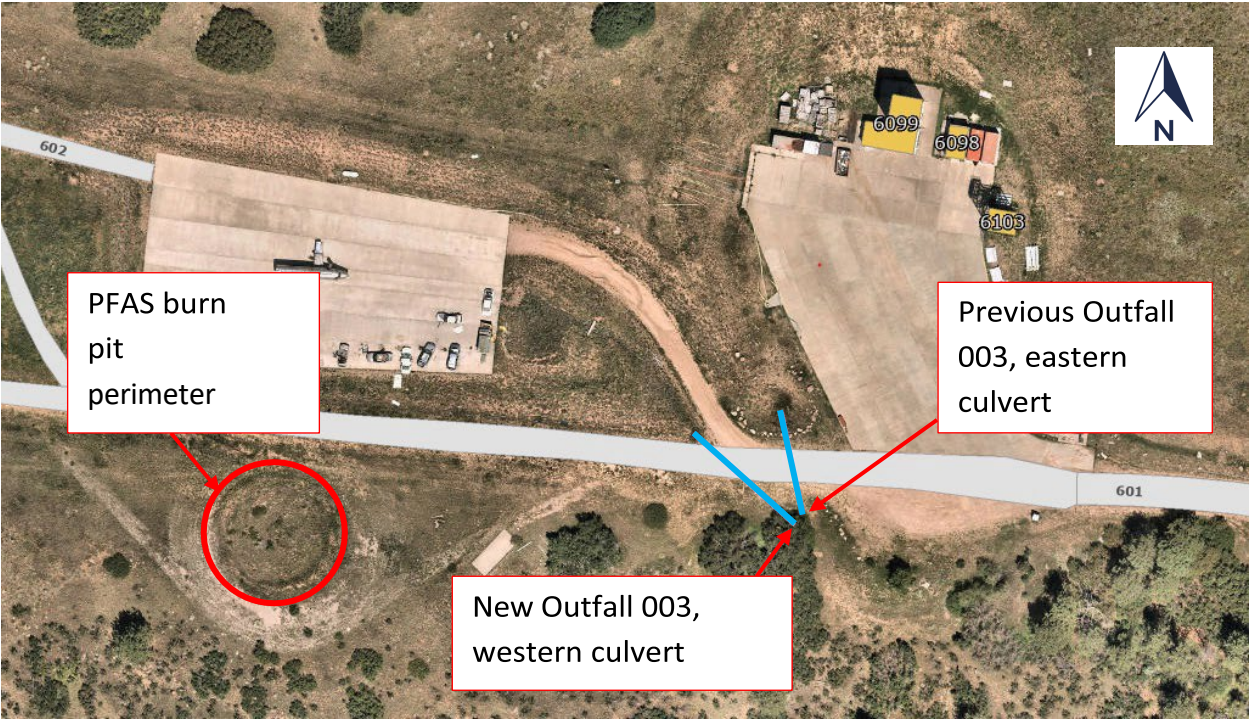


Figure 3. Photo of outfall locations as provided by USAFA on undisclosed date. The western culvert was previously covered in vegetation.

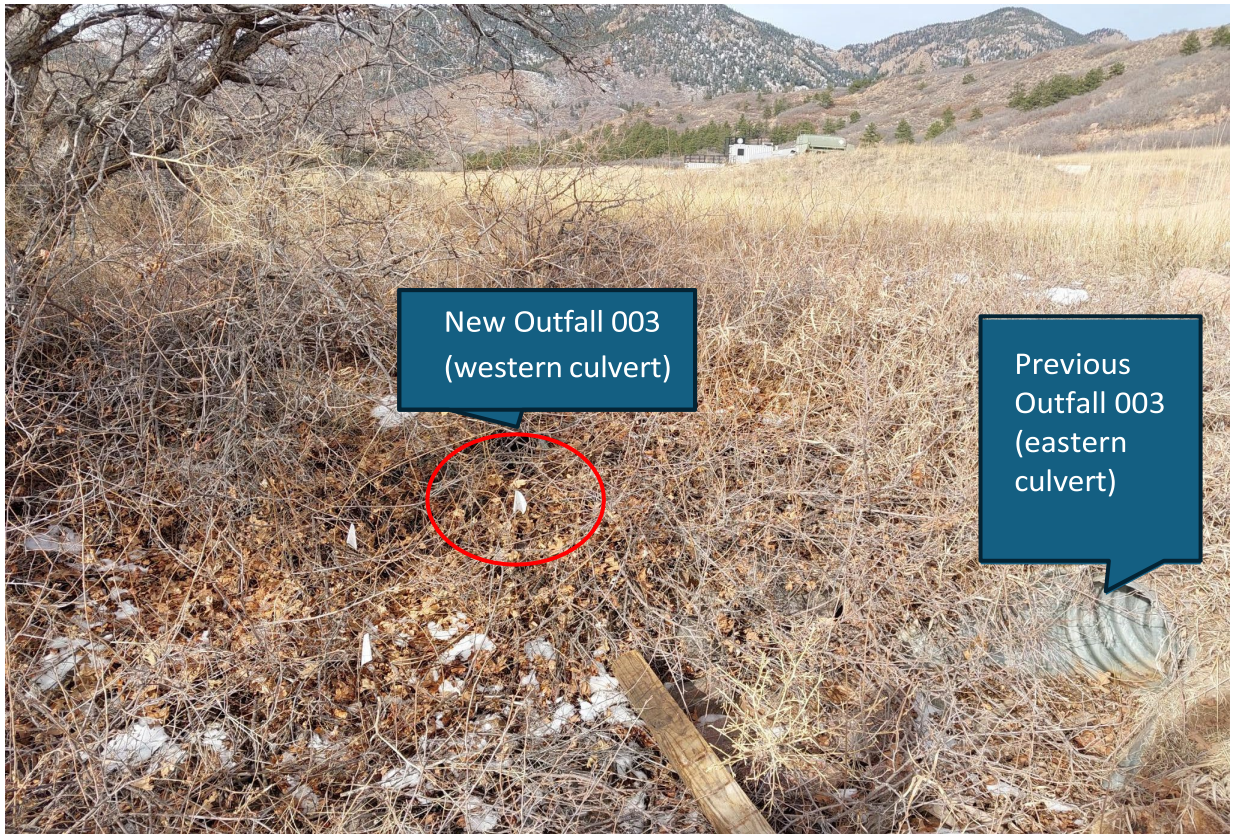


Figure 4. Photo of both previous and new outfall location with vegetation at the western culvert cleared.



The minor modification is being issued as a ministerial change under 40 CFR Part 122.63(a) to ensure that USAFA is collecting monitoring samples from the correct culvert. These culverts have the same latitude and longitude (when rounded to 4 significant digits) due to their close proximity.

EPA also updated the responsible official and facility contact with this minor modification as the previous contacts were no longer in those positions.