

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SAN DIEGO REGION
WATERSHED PROTECTION PROGRAM**

FACILITY INSPECTION REPORT

FACILITY: Hall Property Park, City of Encinitas Community Park **INSPECTION DATE/TIME:** 12/17/2012; 1300

WDID/FILE NO.: 9 37C357837

REPRESENTATIVE(S) PRESENT DURING INSPECTION:

NAME: <u>Laurie Walsh</u>	AFFILIATION: <u>San Diego Water Board</u>
NAME: <u>Erik Steenblock, Storm Water Program Manager</u>	AFFILIATION: <u>City of Encinitas</u>
NAME: <u>Mike Emerson, Env. Specialists</u>	AFFILIATION: <u>City of Encinitas</u>
NAME: <u>Ed Deane, Senior Civil Engineer</u>	AFFILIATION: <u>City of Encinitas</u>
NAME: <u>Larry Sobolsky, Site Forman</u>	AFFILIATION: <u>USS Cal Builders</u>
NAME: <u>David Chen, QSP</u>	AFFILIATION: <u>Scott Environmental Services</u>

City of Encinitas
NAME OF OWNER, AGENCY OR PARTY RESPONSIBLE FOR DISCHARGE

505 South Vulcan, Encinitas, SD, CA 92024
OWNER MAILING ADDRESS

City of Encinitas
OWNER CONTACT NAME AND PHONE #

FACILITY OR DEVELOPER NAME (if different from owner)

425 Santa Fe Drive
FACILITY ADDRESS

City of Encinitas
FACILITY OR DEVELOPER CONTACT NAME AND PHONE #

APPLICABLE WATER QUALITY LICENSING REQUIREMENTS:

- | | |
|---|---|
| <input type="checkbox"/> MS4 URBAN RUNOFF REQUIREMENTS | <input type="checkbox"/> GENERAL OR INDIVIDUAL WASTE DISCHARGE REQUIREMENTS OR NPDES |
| <input checked="" type="checkbox"/> CONSTRUCTION GENERAL PERMIT | <input type="checkbox"/> GENERAL OR INDIVIDUAL WAIVER OF WASTE DISCHARGE REQUIREMENTS |
| <input type="checkbox"/> CALTRANS GENERAL PERMIT | <input type="checkbox"/> SECTION 401 WATER QUALITY CERTIFICATION |
| <input type="checkbox"/> INDUSTRIAL GENERAL PERMIT | <input type="checkbox"/> CWC SECTION 13264 |

INSPECTION TYPE (Check One):

- "A" TYPE COMPLIANCE--COMPREHENSIVE INSPECTION IN WHICH SAMPLES ARE TAKEN. (EPA TYPE S)
- "B" TYPE COMPLIANCE--A ROUTINE NONSAMPLING INSPECTION. (EPA TYPE C)
- NONCOMPLIANCE FOLLOW-UP--INSPECTION MADE TO VERIFY CORRECTION OF A PREVIOUSLY IDENTIFIED VIOLATION.
- ENFORCEMENT FOLLOW-UP--INSPECTION MADE TO VERIFY THAT CONDITIONS OF AN ENFORCEMENT ACTION ARE BEING MET.
- COMPLAINT--INSPECTION MADE IN RESPONSE TO A COMPLAINT.
- PRE-REQUIREMENT--INSPECTION MADE TO GATHER INFO. RELATIVE TO PREPARING, MODIFYING, OR RESCINDING REQUIREMENTS.
- NO EXPOSURE CERTIFICATION (NEC) - VERIFICATION THAT THERE IS NO EXPOSURE OF INDUSTRIAL ACTIVITIES TO STORM WATER.
- NOTICE OF TERMINATION REQUEST FOR INDUSTRIAL FACILITIES OR CONSTRUCTION SITES - VERIFICATION THAT THE FACILITY OR CONSTRUCTION SITE IS NOT SUBJECT TO PERMIT REQUIREMENTS.
- COMPLIANCE ASSISTANCE INSPECTION - OUTREACH INSPECTION DUE TO DISCHARGER'S REQUEST FOR COMPLIANCE ASSISTANCE.

INSPECTION FINDINGS:

Y WERE VIOLATIONS NOTED DURING THIS INSPECTION? (YES/NO/PENDING SAMPLE RESULTS)

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I. COMPLIANCE HISTORY / PURPOSE OF INSPECTION

On December 17, 2012, Laurie Walsh of the San Diego Water Board performed an inspection of the Hall Property Park construction site in response to a complaint. The City of Encinitas' 43-acre construction site began construction in October 2012. This site is located in the Carlsbad Watershed (904.00 HU) within the City of Encinitas, entirely west of I-5. The site drains to Rossini Creek, a water of the U.S. and tributary to San Elijo Lagoon. Photos of the site are attached.

Records of precipitation in the area of the site for December 14th to 17th, 2012 and the seven-day forecasted precipitation for December 17th to 23rd, 2012 is attached to this inspection report.

II. FINDINGS

1. At the time of inspection, all 43 acres of the site was in the rough grading stage. (See Photos 1 and 2).
2. Erosion control BMPs identified in the Storm Water Pollution Prevention Plan dated August 19, 2011 (SWPPP) were not implemented at the site. SWPPP page 16 of SWPPP specifies, "Control erosion in concentrated flow paths by applying erosion control blankets, check dams, erosion control seeding or alternate methods." At the time of inspection, erosion control blankets and hydroseeding were not in place on site. (See Photos 1-5, and 8) A few gravel bag check dams were placed on site after the recent rain event and before this inspection.
3. Inadequate erosion control BMPs were implemented at the site. SWPPP page 17, Table 3.2 Temporary Erosion Control BMPs specifies the use of soil binders, to control erosion in place of hydraulic mulch, hydroseed, straw mulch, geotextiles and mats, wood mulching, slope drains, compost blankets, and non-vegetated stabilization. At the time of inspection, David Chen, QSP from Scott Environmental, stated that soil binders were applied to the stockpiles and the slopes along Starlight Drive and Caretta Way. Most of the 43 acre site was left uncovered by soil binders. Applied soil binders failed to control erosion on the slopes along Starlight Drive and Caretta Way. (See Photos 6-11) Lack of adequate erosion control BMPs caused a discharge of sediment from the site.
4. Inadequate sediment control BMPs were implemented at the site. Page 19 of the SWPPP, Table 3.3 Temporary Sediment Control BMPs, specifies the use of fiber rolls to control sediment in place of silt fences, check dams, sandbag barrier, straw bale barrier, temporary silt dike, compost sock and berm, and biofilter bags. Fiber rolls, to control sediment from being discharged from the site, were not in place throughout the site prior to the rain event. Inspection photos 12-14 show that fiber rolls were placed on the slopes along Starlight Drive and Caretta Way after the recent rain events based on the cleanliness of the rolls and stakes.

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Sediment traps are listed in Table 3.3 as a “BMP used” on site as a sediment control BMP. At the time of the inspection, there were no sediment traps in place anywhere on site.

5. At the time of inspection, sediment control basins were not in place to control sediment from leaving the site. (See Photos 1-15)
6. At the time of inspection, evidence of sediment discharges into Rossini Creek was observed. (See Photos 5-11)

III. RECOMMENDATIONS AND ADDITIONAL COMMENTS

1. Given the size of the construction site, the acreage of disturbed area during the rainy season (October 1, 2012 to April 30, 2013), and proximity to Rossini Creek, the site lacks needs significant upgrades to its sediment and erosion control BMPs.
2. Sediment control basins can be used provided they are designed with adequate capacity to capture and treat sediment-laden storm water generated from the site. Implementation of adequate erosion control BMPs, sediment control BMPs, and sediment basins are required to prior to the rainy season (October 1), as described in the SWPPP.
3. Failure to direct run-on away from the site caused a discharge of sediment from the site to Rossini Creek. BMPs should be installed to protect the site from erosion due to run-on flow volumes.
4. Page 24 of the SWPPP states that there is no anticipated run-on to the project; therefore, no measures are applicable. The SWPPP shall be updated to specify proper BMPs to control run-on to the site.
5. Adequate erosion control BMPs shall be implemented at the site on all slopes and other areas necessary to prevent the discharge of sediment.

IV. SIGNATURE SECTION

Laurie Walsh, PE 12/17/2012
 STAFF INSPECTOR SIGNATURE INSPECTION DATE

Eric Becker, PE
 REVIEWED BY SUPERVISOR SIGNATURE DATE

SMARTS:

Tech Staff Info & Use	
WDID	9 37C357837
Inspection ID	2017614
Violation ID	850270

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Finding 1: 43 acre site in rough grading stage, during the rainy season.



Photo 1

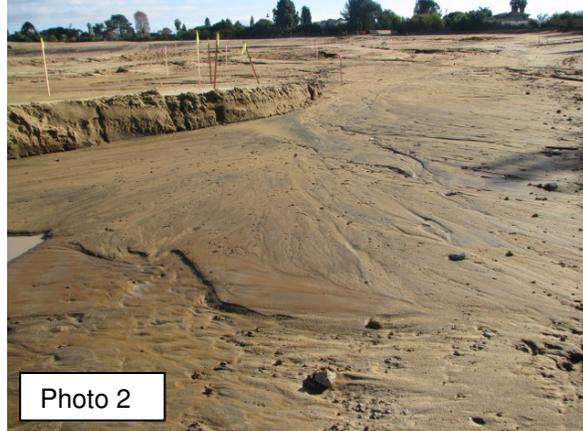


Photo 2

Photo 1: Looking south east over future *Dog Park* location. No erosion or sediment controls in place. Photo 2: Looking south towards Caretta Way. No erosion control and no sediment control in place on the site.

Finding 2: Erosion controls and sediment controls not in place at the site.

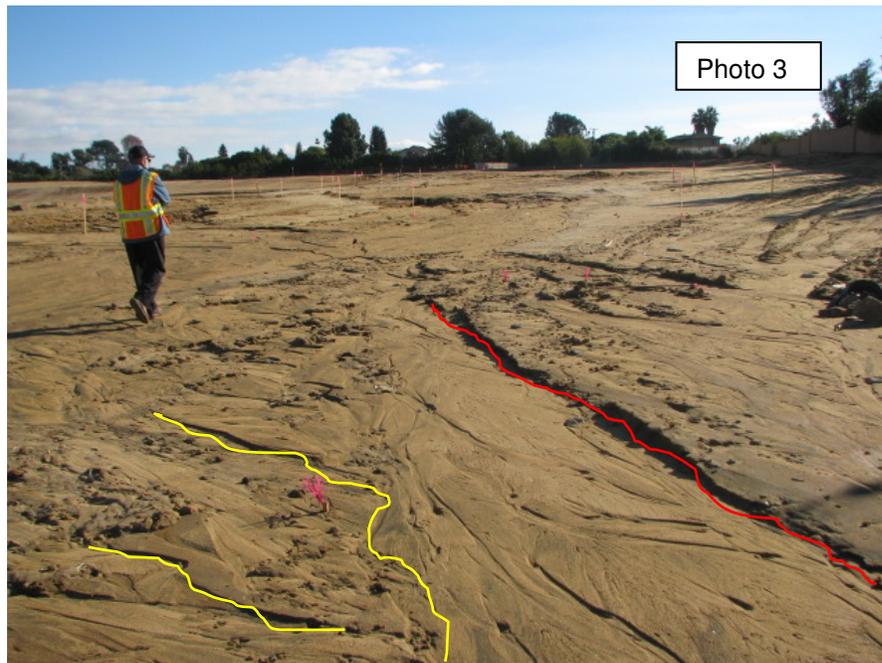


Photo 3

Photo 3: Looking uphill, over largest area of *Community Park* towards Caretta Way. Erosion and sediment controls not present on site. There are no check dams, erosion control blankets, or soil binders in place within the concentrated flow paths as specified in the SWPPP. Erosion evident by rills (a few shown in yellow) and channel incisions (a few shown in red) seen in soil on site.

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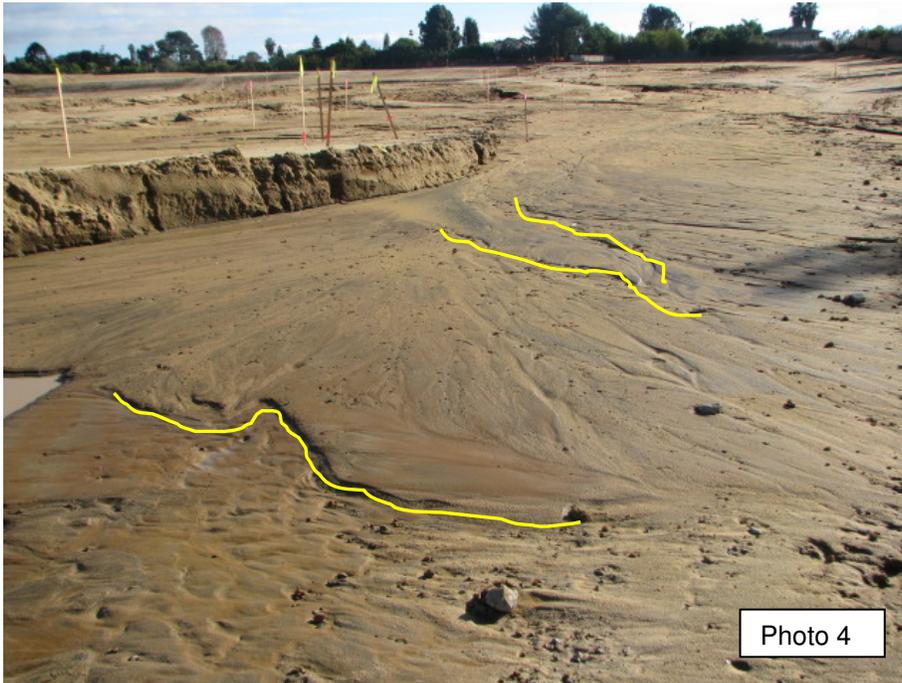


Photo 4

Photo 4: Erosion (rills shown by yellow lines) occurred due to lack of erosion and sediment control BMPs on site prior to the rainy season. There are no check dams, erosion control blankets, or soil binders in place within the concentrated flow paths as specified in the SWPPP.

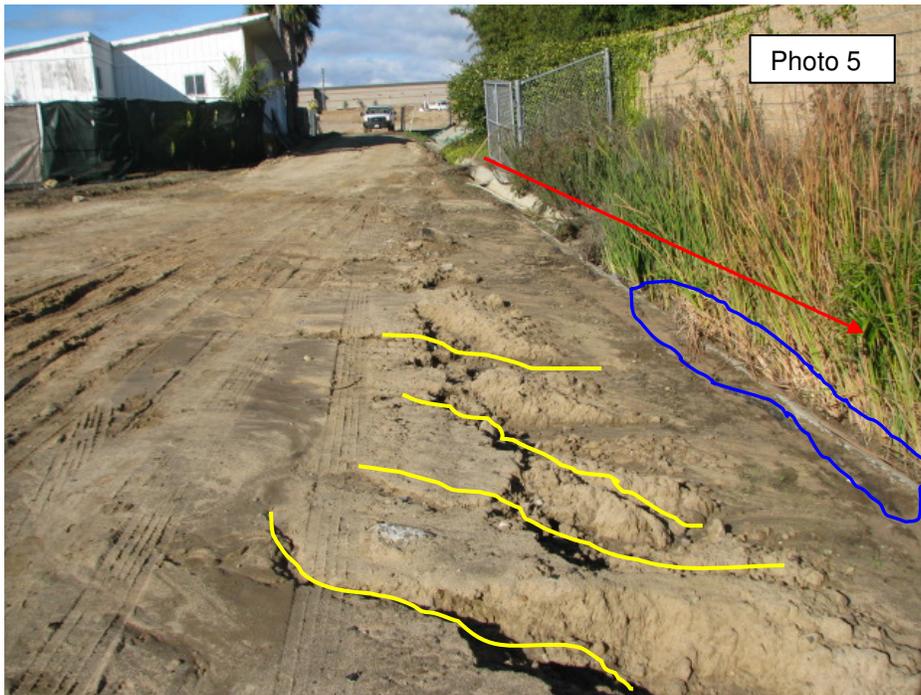


Photo 5

Drainage path leading to Rossini Creek (red arrow). Sediment discharge to drainage ditch evident by large erosion rills (yellow lines) and sediment within vegetation (blue outline).

Photo 5: Significant erosion occurred due to lack of erosion control and sediment control BMPs on site prior to the rain. There are no check dams, erosion control blankets, or soil binders in place within the concentrated flow paths as specified in the SWPPP. Sediment discharged from the site to the concrete ditch (at the right of the photo) that discharges to Rossini Creek.

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Finding 3: Erosion control BMPs (runoff control and soil stabilization) were not present on site. Sediment-laden storm water was discharged from the construction to Rossini Creek.



Photo 6

Photo 6: Soil binders were reportedly used in conjunction with “track-up/track-down” BMPs on the slope. These BMPs failed to secure soil and prevent erosion. This photo shows sedimentation at the base of the slope (outlined in yellow) along the fence line (shown in red).



Photo 7

Photo 7: This is the same fence line (in red) shown in Photo 6. Soil binders and track-up/track-down BMPs failed to secure soil and prevent erosion. This photo shows sediment left the site and was discharged to Starlight Drive. This sediment still had not been cleaned up at the time of inspection. This silt fence looked new because of how clean it is. It is unknown if a silt fence was there prior to the rain event.

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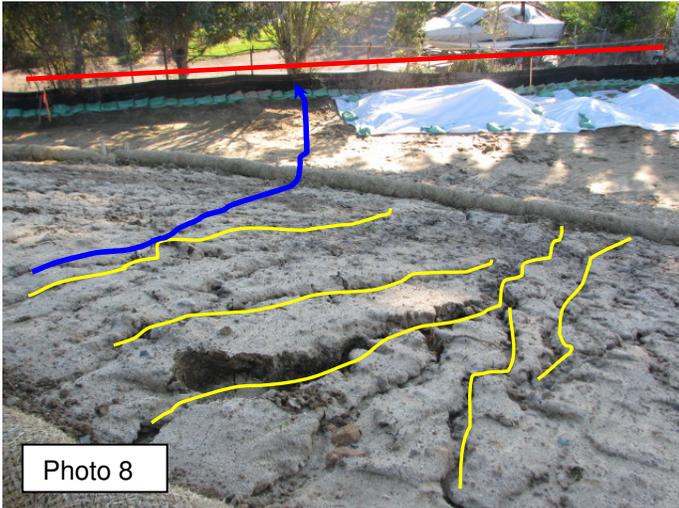
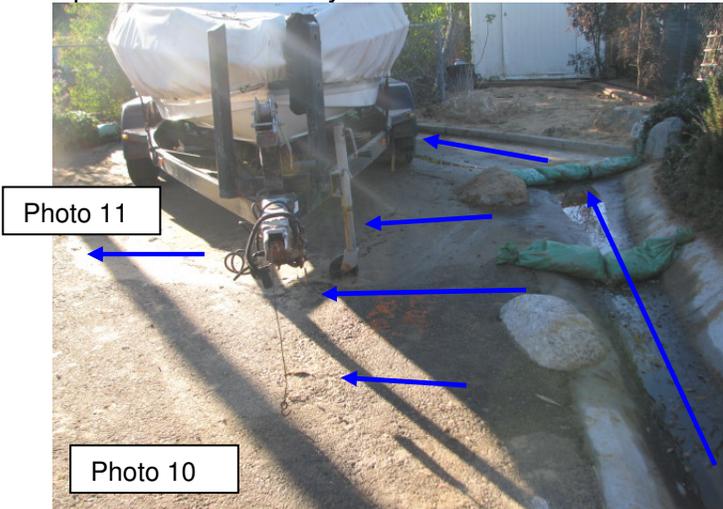


Photo 8 shows evidence of significant erosion rills (outlined in yellow). This slope was reportedly treated with soil binders and the track-up/track-down BMP. As seen in Photo 9, sediment discharged beyond the site fence (outlined in red). This is the same fence as seen in Photo 8. Sediment discharged from the site after the last rain event still seen in the drainage ditch in Photo 9. Sediment deposits can also be seen on the asphalt of Caretta Way in Photo 9. Flow and sediment left the site along a path shown by the blue lines.



Flow and sediment from the site discharged past the fence line shown in Photo 8 and flowed the path shown by the blue line in Photo 9, 10 and 11. As seen in Photo 11 sediment discharged from the site travel quite a distance documenting the lack of erosion control BMPs on the construction site.

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Finding 4: Sediment Control on slopes along Caretta Way.



Photo 12: Soil binder plus “track-up/track down” was reportedly used as a sediment control BMP on the slope shown in Photo 12. The fiber rolls in Photo 12 and the gravel bags at the fence line were placed after the rain event and before the inspection because they were free of any sediment and very clean.



Photo 13 and 14 show new gravel bags (green bags) were placed after the rain event and prior to the inspection. The outer most silt fence was also placed after the rain event and prior to the inspection. The middle silt fence has sediment all over it indicating it was in place before the rain event. The outer most silt fence and stakes were clean. This area was inundated with sediment laden water as indicated by the sediment line on the brick wall (red line). The elevation of the red line is well above the storm drain inlet indicating a discharge of site sediment to the storm drain.

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Finding 5: Storm water detention basins to control sediment were not present on site.



Photo 15 shows reported location where a sediment basin will be constructed.