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## Central Valley Regional Water Quality Control Board

22 March 2017

Ryan Voorhees  
Gold Creek Homes  
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Galt, CA 95632

**CERTIFIED MAIL**  
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***OFFER TO SETTLE ADMINISTRATIVE CIVIL LIABILITY, GOLD CREEK HOMES,  
WOODGATE ESTATES, CALAVERAS COUNTY, WDID 5S05C376000***

This letter contains an offer from the Central Valley Regional Water Quality Control Board (Central Valley Water Board) Prosecution Team to settle potential claims for administrative civil liability arising out of alleged violations by Gold Creek Homes of the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009 DWQ* (General Permit) at the Woodgate Estates project at Highway 26 and Vista Del Lago Drive in Valley Springs. As the owner of the Woodgate Estates project and the legally responsible person enrolled in the General Permit, Gold Creek Homes (Discharger) is responsible for complying with all elements of the General Permit and strictly liable for penalties associated with non-compliance. Hereafter, this letter will be referred to as the "Settlement Offer."

**This Settlement Offer provides the Discharger with an opportunity to resolve the alleged violations through payment of sixty three thousand nine hundred seventy one dollars (\$63,971). Please read this letter carefully and respond no later than 21 April 2017.**

### Description of Violations

On 3 February 2017, Central Valley Water Board staff inspected the Discharger's construction site during a rain event. Staff observed the following violations of the General Permit: (1) poor housekeeping practices including an uncovered 40-yard dumpster, an uncovered stucco waste pile, and trash and debris on the ground; (2) active construction areas where perimeter sediment control BMPs required repair and/or replacement; (3) the lack of erosion control BMPs on disturbed soil in active areas; and, (4) a storm water discharge with turbidity in excess of 1,000 Nephelometric Turbidity Unit (NTUs).

On 7 February 2017, Central Valley Water Board staff conducted a follow-up inspection during a rain event. Staff found that good housekeeping had improved throughout the project. Staff observed active construction areas where some of the sediment control BMPs had been replaced with new fiber rolls. However, there were multiple areas where the fiber rolls still required repair or replacement. The 40-yard dumpster had been covered with a tarp, but the tarp had fallen into the dumpster and was largely ineffective. Staff observed a light application of straw mulch in a few areas but found that most active areas did not have erosion control BMPs.

Turbid storm water discharges were observed flowing into multiple drain inlets. The storm water discharges had turbidity in excess of 1,000 NTUs.

Please see Attachment 1, which contains the Water Board's 10 February 2017 Notice of Violation with the 3 February 2017 and the 7 February 2017 Inspection Reports for a full description of the violations.

In addition, Calaveras County has issued the Discharger Notices of Violation for storm water violations at Woodgate Estates. On 3 February 2017, the County found inadequate BMPs and an illicit discharge to storm water, while on 14 February 2017, the County found inadequate BMPs. Attachment 2 contains the Notices of Violation from Calaveras County.

### Other Considerations

Mr. Ryan Voorhees, the person who is legally responsible for compliance with the General Permit at the Woodgate Estates construction site, has a long history of violating the General Permit. Mr. Voorhees also owned, and was the legally responsible person, for another development company, CRV Enterprises Inc. On 16 September 2005, the Central Valley Board adopted ACL Order R5-2005-0120 in the amount of \$225,000 for CRV Enterprises' construction storm water permit violations at the Gold Creek Estates housing development in Calaveras County. The violations continued for over three months and included a lack of BMPs, inadequate BMPs, poor housekeeping, and discharges of turbid storm water.

Board staff conducted its first inspection of the Woodgate Estates site on 19 November 2015 and found that the Discharger was constructing homes without having first enrolled under the General Permit. A Notice of Noncompliance was issued on 3 December 2015, requiring the Discharger to obtain coverage. Staff inspected the construction site again on 8 April 2016, and observed significant storm water management violations including poorly installed sediment control BMPs, lack of erosion control BMPs, and a portable toilet on the street. In addition, the Discharger still had not enrolled under the General Permit. A Notice of Violation was issued on 12 April 2016. The SMARTS database shows that the Discharger completed the enrollment process on 15 April 2016.

Staff's inspections of 3 February and 7 February 2017, as well as the County's inspections, are discussed above. As part of the General Permit process, the Discharger's consultant developed a Storm Water Pollution Prevention Plan (SWPPP) which describes the site-specific BMPs to be installed at various phases of construction. Staff found that although the SWPPP described sediment and erosion controls and other BMPs, the Discharger had not implemented the BMPs.

### Statutory Liability

Pursuant to Section 13385 of the California Water Code, the Discharger is liable for administrative civil liabilities of up to \$10,000 per violation for each day in which the violation occurs and \$10 per gallon discharged in excess of the first 1,000 gallons. The statutory minimum civil liability is the economic benefit resulting from the violations. The State Water Resources Control Board's *Water Quality Enforcement Policy* (Enforcement Policy) states that the minimum penalty is to be the economic benefit plus 10%. For the violations described in the attachments, the maximum potential liability for the violations is over \$100,000 and the minimum liability is \$3,355.

Proposed Settlement Offer

**The Central Valley Water Board's Prosecution Team proposes to resolve the violation(s) with this Settlement Offer of \$63,971.** This Settlement Offer was determined based on an assessment of the factors set forth in Water Code section 13385(e) using the penalty methodology set forth in the Enforcement Policy. The enclosed "Penalty Calculation Methodology" describes in detail how the penalty amount was calculated. The Prosecution Team believes that the proposed resolution of the alleged violation(s) is fair and reasonable, fulfills the Central Valley Water Board's enforcement objectives, and is in the best interest of the public.

Should the Discharger choose *not* to accept this Settlement Offer, please be advised that the Central Valley Water Board Prosecution Team reserves the right to seek a higher liability amount, up to the maximum allowed by statute, either through issuance of a formal administrative civil liability complaint or by referring the matter to the Attorney General's Office. The Central Valley Water Board Prosecution Team also reserves the right to conduct additional investigation, including issuance of investigation orders and/or subpoenas to determine the number of gallons discharged and whether additional violations occurred. Any additional violations and gallons of discharge subjecting the Discharger to liability may be included in a formal enforcement action. The Discharger can avoid the risks inherent in a formal enforcement action and settle the alleged violation(s) by accepting this Settlement Offer. Please note that the Settlement Offer does not address liability for any violation that is not specifically identified in the attached inspection reports.

Options for Responding to the Settlement Offer**Option A: Accept the Offer**

If the Discharger chooses to accept this Settlement Offer, then the enclosed *Acceptance of Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver)* shall be completed and submitted no later than **21 April 2017** to the following address:

Central Valley Regional Water Quality Control Board  
Attention: Wendy Wyels, Supervisor, Enforcement Section  
11020 Sun Center Drive, Suite A  
Rancho Cordova, CA 95670

**Important!** - Upon receipt of the *Acceptance and Waiver*, this settlement will be publically noticed for a 30-day comment period as required by federal regulations. If no substantive comments are received within the 30 days, the Prosecution Team will ask the Central Valley Water Board's Executive Officer to formally endorse the *Acceptance and Waiver* as an order of the Central Valley Water Board. An invoice will then be mailed to the Discharger requiring payment of the \$63,971 administrative civil liability within 30 days of the date of the invoice.

If, however, substantive comments are received in opposition to this settlement and/or the Executive Officer declines to accept the settlement, then the Settlement Offer may be withdrawn. In this case, the Discharger will be notified and the Discharger's waiver pursuant to the *Acceptance and Waiver* will also be treated as withdrawn. The unresolved violation(s) will be addressed in a formal enforcement action. An administrative civil liability complaint may be issued and the matter may be set for a hearing.

**Option B: Contest the Alleged Violations**

If the Discharger wishes to contest the violation(s) or the methodology used to calculate the proposed liability, it must submit a written response identifying the basis for the challenge, including any evidence to support its claims. The Discharger's response must be received by the Central Valley Water Board no later than **21 April 2017**. The Central Valley Water Board Prosecution Team will evaluate the Discharger's basis for a challenge and may seek clarifying information or schedule an in-person meeting. The Prosecution Team will inform the Discharger whether a reduction in the settlement amount is warranted, or whether the original settlement amount is appropriate. The Discharger will be provided a final opportunity to accept the revised/original settlement amount before proceeding to formal enforcement.

**Option C: Reject Offer**

If the Discharger chooses to reject this Settlement Offer and/or does not complete and return the *Acceptance and Waiver*, the Discharger should expect that the Prosecution Team will conduct further investigation of the violation(s), issue an administrative civil liability complaint, and schedule a hearing. The Discharger will receive notice of any deadlines associated with that action. As previously stated, in such an action, the liability amount sought and/or imposed may exceed the liability amount set forth in this Settlement Offer.

If you have any questions about this settlement offer, please contact Wendy Wyels at (916) 464-4835 or at [wwyels@waterboards.ca.gov](mailto:wwyels@waterboards.ca.gov).



ANDREW ALTEVOGT  
Assistant Executive Officer

Enclosures: Acceptance of Settlement Offer and Waiver of Right to a Hearing  
Penalty Calculation Methodology  
Attachment 1: Water Board 10 February 2017 Notice of Violation, 3 February 2017  
Inspection Report, and 7 February 2017 Inspection Report  
Attachment 2: Calaveras County NOVs dated 3 February and 16 February 2017

cc: David Boyers, Assistant Chief Counsel, State Water Board Office of Enforcement  
Pamela Creedon, Executive Officer, Central Valley Water Board, Rancho Cordova  
Andrew Deeringer, Office of Chief Counsel, State Water Board, Sacramento  
Brenda Johnson, Calaveras County Public Works, San Andreas



*Waiver*, prior to being formally endorsed by the Central Valley Water Board Executive Officer (acting as head of the Advisory Team), will be published as required by law for public comment

If no comments are received within the notice period that cause the Prosecution Team to reconsider the Settlement Offer, then the Prosecution Team will present this *Acceptance and Waiver* to the Central Valley Water Board's Executive Officer for formal endorsement on behalf of the Central Valley Water Board.

The Discharger understands that if significant comments are received in opposition to the settlement, then the offer may be withdrawn by the Prosecution Team. If the Settlement Offer is withdrawn, then the Discharger will be notified and the Discharger's waiver pursuant to the *Acceptance and Waiver* will also be treated as withdrawn. The unresolved violation(s) will be addressed in a formal enforcement action. An administrative civil liability complaint may be issued and the matter may be set for a hearing.

The Discharger understands that once this *Acceptance and Waiver* is formally endorsed and an Order Number is inserted, then the full payment is a condition of this *Acceptance and Waiver*. An invoice will be sent upon endorsement, and full payment will be due within 30 days of the date of the invoice.

I hereby affirm that I am duly authorized to act on behalf of and to bind the Discharger in the making and giving of this *Acceptance and Waiver*.

GOLD CREEK HOMES

By: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

IT IS SO ORDERED, pursuant to California Water Code section 13385.

By: \_\_\_\_\_  
Pamela Creedon, Executive Officer

Date: \_\_\_\_\_

**PENALTY CALCULATION METHODOLOGY  
FOR  
GOLD CREEK HOMES  
WOODGATE ESTATES  
CALAVERAS COUNTY**

The State Water Board's *Water Quality Enforcement Policy* (Enforcement Policy) establishes a methodology for determining administrative civil liability by addressing the factors that are required to be considered under California Water Code section 13385(e). Each factor of the nine-step approach is discussed below, as is the basis for assessing the corresponding score. The Enforcement Policy can be found at:

[http://www.waterboards.ca.gov/water\\_issues/programs/enforcement/docs/enf\\_policy\\_final111709.pdf](http://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/enf_policy_final111709.pdf).

Violation 1 – Failure to minimize or prevent pollutants in storm water discharges

During the site inspections on 3 and 7 February 2017, Central Valley Water Board staff observed the general lack of erosion control Best Management Practices (BMPs) throughout the project, areas that required additional sediment control BMPs, and sediment-laden runoff measured in excess of 1,000 NTU discharging from the site. The Prosecution Team alleges the discharge of turbid storm water runoff without installing BMPs that meet the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology (BAT/BCT) standard is a violation of the General Permit. Attachment D, section A.1.b, Effluent Standards, in the General Permit states: *Dischargers shall minimize or prevent pollutants in storm water discharges and authorized non-storm water discharges through the use of controls, structures, and management practices that achieve BAT for toxic and non-conventional pollutants and BCT for conventional pollutants.*

<b>PENALTY FACTOR</b>	<b>VALUE</b>	<b>DISCUSSION</b>
Harm or potential for harm to beneficial uses	3	The sediment-laden water discharged to a tributary to Indian Creek which flows to the lower Calaveras River below New Hogan Reservoir. The beneficial uses of the lower Calaveras River include aquatic freshwater habitat, spawning, and migration. The discharge was reasonably expected to have a moderate impact to beneficial uses, but the impact is likely to attenuate without appreciable acute or chronic effects.
Physical, chemical, biological, or thermal characteristics of the discharge	2	Discharges of sediment can cloud the receiving water (which reduces the amount of sunlight reaching aquatic plants), clog fish gills, smother aquatic habitat and spawning areas, and impede navigation. Sediment can also transport other materials such as nutrients, metals, and oils and grease, which can also negatively impact aquatic life and aquatic habitat.
Susceptibility to cleanup or abatement	1	The sediment discharged was dispersed by storm water over a long distance and cleanup or abatement of 50% or more of the material would not be possible.
Per gallon and per day factor for discharge violations	0.22	The "Deviation from Requirement" is major because the Discharger essentially ignored several requirements of the General Permit rendering the permit's BAT/BCT effluent standard ineffective. The value of 0.22 was determined from Table 1 of the Enforcement Policy.
Volume discharged	n/a	The Prosecution Team is choosing not to calculate the volume of discharge at this time. The Prosecution Team reserves the right to include the volume discharged in the penalty calculation should this matter proceed to hearing.

PENALTY FACTOR	VALUE	DISCUSSION
Adjustment for high volume discharges	n/a	The Prosecution Team is choosing not to calculate the volume of discharge at this time. The Prosecution Team reserves the right to include the volume discharged in the penalty calculation should this matter proceed to hearing.
Days of discharge	2	Staff observed discharges on 3 and 7 February 2016. The Prosecution Team reserves the right to include additional days of violation should this matter proceed to hearing.
<b>Initial Liability for Violation #1</b>	\$4,400	The liability is calculated as per day factor multiplied by the number of days multiplied by the maximum liability per day (\$10,000/day).
<b>Adjustments for Discharger Conduct</b>		
Culpability	1.1	The Discharger has applied for and received permit coverage under the General Permit for numerous construction sites in California. The Discharger also had a SWPPP that identified appropriate BMPs for this project. Therefore, the Discharger should be aware of the General Permit's requirements and should have implemented its SWPPP.
Cleanup and Cooperation	1.1	Minor improvements were observed during staff's second inspection, but they were not sufficient to achieve compliance with the permit.
History of Violations	1.4	The Discharger in this case is Gold Creek Homes which is owned by Ryan Voorhees. Ryan Voorhees previously owned another development company, CRV Enterprises Inc. In 2005, the Central Valley Board adopted ACL Order R5-2005-0120 in the amount of \$225,000 for CRV Enterprises' construction storm water permit violations at the Gold Creek Estates housing development in Calaveras County. On 3 December 2015, Board staff issued a Notice of Non-Compliance to the Discharger for constructing homes at the current Woodgate Estates project without General Permit coverage. On 12 April 2016, Board staff issued a Notice of Violation to the Discharger for (a) inadequate erosion and sediment control BMPs at the Woodgate Estates project and (b) failure to complete the application process for enrollment under the General Permit. The SMARTS database shows that the Discharger completed the enrollment process on 15 April 2016. In addition, Calaveras County has issued two Notices of Violation to the Discharger for inadequate BMPs and an illicit discharge of storm water at the Woodgate Estates project.
<b>Total Base Liability for Violation #1</b>	\$7,453	The base liability is calculated as the initial liability multiplied by each of the above three factors.

Violation 2 – Failure to establish and maintain effective perimeter controls

During the site inspections on 3 and 7 February 2017, Central Valley Water Board staff observed that sediment control BMPs required repair or replacement. Turbid storm water runoff was flowing over the flattened fiber rolls and into the street. The Prosecution Team alleges that failure to establish and maintain effective perimeter controls is a violation of the General Permit. Attachment D, section E.1 in the General Permit states: *Risk Level 2 dischargers shall establish and maintain effective perimeter controls and stabilize all construction entrances and exits to sufficiently control erosion and sediment discharges from the site.*

PENALTY FACTOR	VALUE	DISCUSSION
Discharge violations	n/a	This step is not applicable because the violation is not a discharge violation.
Potential for harm	Moderate	The failure to maintain effective perimeter controls contributed to the discharge of sediment-laden water. Discharges of sediment can cloud the receiving water (which reduces the amount of sunlight reaching aquatic plants), clog fish gills, smother aquatic habitat and spawning areas, and impede navigation. Sediment can also transport other materials such as nutrients, metals, and oils and grease, which can also negatively impact aquatic life and aquatic habitat.
Deviation from requirement	Moderate	The "Deviation from Requirement" is moderate because the Discharger only partially complied with the perimeter control requirement reducing the intended effectiveness of the requirement related to protecting an active construction site during storm events.
Per day factor	0.35	Determined from Table 3 in the Enforcement Policy. The middle value was chosen at this time.
Days of violation	3	Violations occurred on 3, 6 and 7 February 2017 because local rainfall data indicated rainfall occurred on each of these days and Water Board staff observed deficient BMPs on 3 February 2017 and 7 February 2017.
<b>Initial Liability for Violation #2</b>	\$10,500	The liability is calculated as per day factor multiplied by the number of days multiplied by the maximum liability per day (\$10,000/day).
<b>Adjustments for Discharger Conduct</b>		
Culpability	1.1	The Discharger has applied for and received permit coverage under the General Permit for numerous construction sites in California. The Discharger also had a SWPPP that identified appropriate BMPs for this project. Therefore, the Discharger should be aware of the General Permit's requirements.
Cleanup and Cooperation	1.1	During the inspection on 7 February 2017, Board staff observed some fiber rolls had been replaced but deficient BMPs remained.
History of Violations	1.4	As noted above, the Discharger has a history of violations related to the General Permit.
<b>Total Base Liability for Violation #2</b>	\$17,787	The base liability is calculated as the initial liability multiplied by each of the above three factors.

Violation 3 – Failure to implement appropriate erosion control BMPs

During the site inspections on 3 and 7 February 2017, Central Valley Water Board staff observed that effective erosion control BMPs, such as straw or hydraulic mulch, were not installed in active construction areas. The Prosecution Team alleges that failure to implement appropriate erosion control BMPs is a violation of the General Permit. Attachment D, section E.1 in the General Permit states in part: *Risk Level 2 dischargers shall implement appropriate erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active construction. Areas under active construction are defined in the General Permit as areas undergoing land surface disturbance, including construction activity during the preliminary stage, mass grading stage, streets and utilities stage and the vertical construction stage.*

PENALTY FACTOR	VALUE	DISCUSSION
Discharge violations	n/a	This step is not applicable because the violation is not a discharge violation.
Potential for harm	Moderate	The failure to install appropriate erosion and sediment controls led to the discharge, or potential for discharge of sediment laden water. Discharges of sediment can cloud the receiving water (which reduces the amount of sunlight reaching aquatic plants), clog fish gills, smother aquatic habitat and spawning areas, and impede navigation. Sediment can also transport other materials such as nutrients, metals, and oils and grease, which can also negatively impact aquatic life and aquatic habitat.
Deviation from requirement	Major	The "Deviation from Requirement" is major because the Discharger essentially ignored this requirement by not installing erosion control BMPs on all disturbed soil areas prior to a storm event rendering this requirement ineffective.
Per day factor	0.55	Determined from Table 3 in the Enforcement Policy. The middle value was chosen at this time.
Days of violation	3	Violations occurred on 3, 6 and 7 February 2017 because local rainfall data indicated rainfall occurred on each of these days and Water Board staff observed deficient BMPs on 3 February 2017 and 7 February 2017.
<b>Initial Liability for Violation #3</b>	\$16,500	The liability is calculated as per day factor multiplied by the number of days multiplied by the maximum liability per day (\$10,000/day).
<b>Adjustments for Discharger Conduct</b>		
Culpability	1.1	The Discharger has applied for and received permit coverage under the General Permit for numerous construction sites in California. The Discharger also had a SWPPP that identified appropriate BMPs for this project. Therefore, the Discharger should be aware of the General Permit's requirements.
Cleanup and Cooperation	1.1	No significant improvements to the erosion controls BMPs were observed during staff's inspection on 7 February 2017.
History of Violations	1.4	As noted above, the Discharger has a history of violations related to the General Permit.
<b>Total Base Liability for Violation #3</b>	\$27,951	The base liability is calculated as the initial liability multiplied by each of the above three factors.

Violation 4 – Failure to cover stockpiled construction materials

During the site inspections on 3 February 2017, Central Valley Water Board staff observed a pile of stucco waste on the ground without being contained or protected from rainfall. Prosecution Team alleges that failure to cover and berm loose stockpiled construction materials is a violation of the General Permit. Attachment D, section B.1 in the General Permit states in part: *Risk Level 2 dischargers shall implement good site management (i.e., "housekeeping") measures for construction materials that could potentially be a threat to water quality if discharged. At a minimum, Risk Level 2 dischargers shall implement the following good housekeeping measures: b. Cover and berm loose stockpiles construction materials that are not actively being used (i.e., soil, spoils, aggregate, fly-ash, stucco, hydrated lime, etc.).*

PENALTY FACTOR	VALUE	DISCUSSION
Discharge violations	n/a	This step is not applicable because the violation is not a discharge violation.
Potential for harm	Minor	The failure to cover and berm stucco waste materials has the potential to increase pH in runoff. pH outside of the acceptable limits can adversely impact beneficial uses associated with fish and wildlife habitat. In this case, staff anticipates that due to the limited volume of stucco waste and other flows available for mixing in the vicinity of the discharge location, it is likely that any adverse impact associated with this violation would be fairly short term and localized. Therefore, a minor potential for harm factor is assigned.
Deviation from requirement	Major	The "Deviation from Requirement" is major because the Discharger ignored this General Permit requirement by not covering the stockpile, rendering this requirement ineffective.
Per day factor	0.35	Determined from Table 3 in the Enforcement Policy. The middle value was chosen at this time.
Days of violation	1	Water Board staff observed the uncovered stockpile on 3 February 2017.
<b>Initial Liability for Violation #4</b>	<b>\$3,500</b>	The liability is calculated as per day factor multiplied by the number of days multiplied by the maximum liability per day (\$10,000/day).
<b>Adjustments for Discharger Conduct</b>		
Culpability	1.1	The Discharger has applied for and received permit coverage under the General Permit for numerous construction sites in California. The Discharger also had a SWPPP that identified appropriate BMPs for this project. Therefore, the Discharger should be aware of the General Permit's requirements.
Cleanup and Cooperation	1.0	The stockpile was covered during staff's inspection on 7 February 2017.
History of Violations	1.4	As noted above, the Discharger has a history of violations related to the General Permit.
<b>Total Base Liability for Violation #4</b>	<b>\$5,390</b>	The base liability is calculated as the initial liability multiplied by each of the above three factors.

Violation 5 – Failure to cover waste disposal containers

During the site inspections on 3 February 2017, Central Valley Water Board staff observed an uncovered 40-cubic yard dumpster filled with construction waste. The Prosecution Team alleges that failure to cover a waste disposal container during a rain event is a violation of the General Permit. Attachment D, section B.2 in the General Permit states in part: *Risk Level 2 dischargers shall implement good housekeeping measures for waste management, which at a minimum, shall consist of the following: d. Cover waste disposal containers at the end of every business day and during a rain event.*

PENALTY FACTOR	VALUE	DISCUSSION
Discharge violations	n/a	This step is not applicable because the violation is not a discharge violation.
Potential for harm	Minor	The failure to cover a waste disposal container during a rain event creates a potential threat to beneficial uses. No leaks from the dumpster were noted by Board staff. Therefore, a minor potential for harm factor is assigned.

PENALTY FACTOR	VALUE	DISCUSSION
Deviation from requirement	Major	The "Deviation from Requirement" is major because the Discharger ignored this General Permit requirement by not covering the waste disposal container, rendering this requirement ineffective.
Per day factor	0.35	Determined from Table 3 in the Enforcement Policy. The middle value was chosen at this time.
Days of violation	1	Water Board staff observed the uncovered dumpster on 3 February 2017.
<b>Initial Liability for Violation #4</b>	<b>\$3,500</b>	The liability is calculated as per day factor multiplied by the number of days multiplied by the maximum liability per day (\$10,000/day).
<b>Adjustments for Discharger Conduct</b>		
Culpability	1.1	The Discharger has applied for and received permit coverage under the General Permit for numerous construction sites in California. The Discharger also had a SWPPP that identified appropriate BMPs for this project. Therefore, the Discharger should be aware of the General Permit's requirements.
Cleanup and Cooperation	1.0	The dumpster was covered during staff's second inspection.
History of Violations	1.4	As noted above, the Discharger has a history of violations related to the General Permit.
<b>Total Base Liability for Violation #4</b>	<b>\$5,390</b>	The base liability is calculated as the initial liability multiplied by each of the above three factors.

The Enforcement Policy states that five other factors must be considered before obtaining the final liability amount.

<b>Total Base Liability for all violations: \$63,971</b>		
<b>Other Factor Considerations</b>		
Ability to pay and continue in business	No adjustment	Gold Creek Homes specializes in building residential communities. According to its website (goldcreekhomes.com, accessed 3/9/2017), the company is currently involved with three existing projects and four proposed projects in California plus an existing project in New Mexico. A company of this size has the ability to pay the penalty and remain in business.
Economic benefit	\$3,050	The avoided cost of properly stabilizing the site with sediment control and erosion control BMPs was calculated to be approximately \$3,050. The cost for the sediment control BMPs is based on an assumed 900 linear feet of fiber rolls needed to meet the linear sediment control BMP requirement at an installed cost of \$1.50/linear foot (900 * \$1.50 = \$1,350). The cost for temporary erosion control BMPs in active construction areas is based on application of bonded fiber matrix on an assumed 0.15 acres of disturbed soil at a cost of \$2,000 per acre plus a \$500 mobilization fee. (0.15 * \$2,000 + \$500 = \$800). <sup>1</sup> (\$1,350 + \$800 = \$2,150). Six lots with completed homes were not stabilized. These lots should have been stabilized when completed. The total cost of hydroseeding these lots is estimated to be \$900 (0.1 acres * \$4,000/acre + \$500 mobilization = \$900). (\$2,150 + \$900 = \$3,050)

<sup>1</sup> Estimated costs from the November 2009 CASQA Storm Water Best Management Practice Handbook for Construction

Other factors as justice may require	No adjustment	The costs of investigation and enforcement are “other factors as justice may require”, and could be added to the liability amount. The Central Valley Water Board has incurred over \$5,000 in staff costs associated with the investigation and enforcement of the alleged violations. While this amount could be added to the penalty, it is not added at this time.
Maximum liability	Over \$100,000	Based on California Water Code section 13385: \$10,000 per day per violation and \$10 per gallon. The Prosecution Team reserves the right to include the volume discharged in the penalty calculation should this matter proceed to hearing.
Minimum liability	\$3,355	Based on California Water Code section 13385, civil liability must be at least the economic benefit of non-compliance. Per the Enforcement Policy, the minimum liability is to be the economic benefit plus 10%.
<b>Final Liability</b>	<b>\$63,971</b>	The final liability amount is the total base liability plus any adjustment for the ability to pay, economic benefit, and other factors. The final liability must be more than the minimum liability and less than the maximum liability.

Settlement Offer  
Gold Creek Homes  
Woodgate Estates  
Calaveras County

Attachment A: Central Valley Water Board Notice of Violation dated 10 February 2017  
with 3 February and 7 February 2017 Inspection Reports

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## Central Valley Regional Water Quality Control Board

10 February 2017

Ryan Voorhees  
Gold Creek Homes  
28082 Nichols Road  
Galt, CA 95632

**CERTIFIED MAIL**  
91 7199 9991 7035 8365 4744

### ***NOTICE OF VIOLATION, GOLD CREEK HOMES, GOLD CREEK WOODGATE ESTATES, CALAVERAS COUNTY, WDID 5S05C376000***

On 3 February 2017 and 7 February 2017, Central Valley Water Board staff inspected the Gold Creek Woodgate Estates project at Highway 26 and Vista Del Lago Drive in Valley Springs to evaluate compliance with the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009 DWQ (General Permit). As the owner of the Gold Creek Woodgate Estates project and the legally responsible person enrolled in the General Permit for this project, Gold Creek Homes (Discharger) is responsible for complying with all elements of the General Permit for this project. This construction project is a Risk Level 2 site under the terms of the General Permit.

During the inspection on 3 February 2017, Water Board staff observed active construction areas where sediment control BMPs required repair and/or replacement, the lack of erosion control BMPs in active areas, poor good housekeeping practices, an uncovered 40-yard dumpster, and a turbid storm water discharge in excess of 1000 Nephelometric Turbidity Unit (NTUs).

During the inspection on 7 February 2017, Water Board staff observed that some of the fiber rolls had been replaced, however the fiber rolls in many areas required repair or replacement. Additionally, staff observed the lack of erosion control BMPs in active areas and a turbid storm water discharge in excess of 1000 Nephelometric Turbidity Unit (NTUs). Staff identified that the dumpster had been covered and good housekeeping practices had improved throughout the project.

#### **Violations**

The Discharger has failed to implement good housekeeping BMPs, failed to maintain perimeter sediment control BMPs on much of the project, failed to apply erosion control BMPs, and discharged turbid water from the project. Therefore, the Discharger is in violation of the following General Permit sections:

- Attachment D, Part B. Good Site Management “Housekeeping” which states in part:

- 1.b. Cover and berm loose stockpiled construction materials that are not actively being used.
- 2.d Cover waste disposal containers at the end of every business day and during a rain event.

Attachment D, Part E. Sediment Controls, which states in part:

1. *Risk Level 2 dischargers shall establish and maintain effective perimeter controls and stabilize all construction entrances and exits to sufficiently control erosion and sediment discharges from the site.*
  3. **Additional Risk Level 2 Requirement:** *Risk Level 2 dischargers shall implement appropriate erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active construction.*
- Attachment D, Part A. Effluent Standards, item 1, which states in part:
    - b. *Dischargers shall minimize or prevent pollutants in storm water discharges and authorized non-storm water discharges through the use of controls, structures, and management practices that achieve BAT for toxic and non-conventional pollutants and BCT for conventional pollutants.*

## Response

In response to this Notice of Violation, Gold Country Homes must complete the following:

- Immediately install an effective combination of erosion and sediment control BMPs throughout the site as required by the General Permit. This includes effectively stabilizing all disturbed soil areas and maintaining erosion and sediment control BMPs across the site.
- Ensure that waste disposal containers are covered at the end of every business day and during rain events. Utilize a covered dumpster or another method that keeps storm water out of the dumpster.
- Implement and maintain good housekeeping BMPs to minimize trash and debris throughout the project.
- Stabilize completed homes that have been sold per the post construction BMPs described in the SWPPP.
- Ensure that site BMPs are effective and result in the reduction or elimination of pollutants in storm water discharges and authorized non-storm water discharges from construction activity to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology (BAT/BCT) standard.

In order to demonstrate compliance with the General Permit, Board staff requests that you submit the following documents using the site's SMARTS account by **28 February 2017**:

- An updated SWPPP map showing all BMPs installed across the project.
- Copies of the Rain Event Action Plans (REAPs) for the 2016-2017 wet season. Include any photographs taken during the REAP inspections.
- Copies of all pre- and post- qualifying storm event visual monitoring (inspection) reports and all storm water discharge sampling and analysis records for the 2016-2017 wet season. These reports should include the applicable information specified in General Permit Attachment D., Section I., item 14, Risk Level 2 – Records.

These violations of the General Permit have exposed Gold Country Homes to possible further enforcement action. Under Section 13385 of the California Water Code, the Central Valley Water Board can impose administrative civil liabilities (monetary fines) for violations of the General Permit. The maximum administrative civil liability for each violation is ten thousand dollars (\$10,000) per day and ten dollars per gallon of polluted storm water discharged in excess of 1,000 gallons. Please note that coming into compliance does not resolve the violations identified in this document, but may have bearing upon the magnitude of further enforcement actions.

If you have any questions, please contact Richard Muhl at (916) 464-4749 or [Richard.Muhl@waterboards.ca.gov](mailto:Richard.Muhl@waterboards.ca.gov).



STEVE E. ROSENBAUM  
Chief, Storm Water Compliance and Enforcement Unit

Enclosures: 02/03/2017 Inspection report with site photographs  
02/07/2017 Inspection report with site photographs  
SWPPP maps

cc: Greg Gholson, U.S. Environmental Protection Agency, Region IX, San Francisco  
Robert Pachinger, County of Calaveras, San Andreas

# Storm Water Construction General Permit Inspection Report

## Central Valley Regional Water Quality Control Board

Insp. Date & Time:	02/03/2017	Inspected By:	Rich Muhl
WDID #	5S05C376000	Site County:	Calaveras
Operator Name:	Gold Creek Homes		
Facility Name:	Gold Creek Woodgate Estates		
Facility Address:	Hwy 26 and Vista Del Lago Drive, Valley Springs, CA 95252		
Facility Contact:	Ryan Voorhees (209) 367-1706		

Inspection Type: <input checked="" type="checkbox"/> Enforcement follow-up			
SWPPP on site?	Unknown	SWPPP Implemented/Updated?	No
Photos Taken?	Yes	Appropriate Monitoring Program?	Yes
Weather:	Rain	Evidence of SW or Non-SW Discharge?	Yes

### Inspection Summary / Comments:

On 3 February 2017, Central Valley Regional Water Quality Control Board staff inspected the Gold Creek Homes, Gold Creek Woodgate Estates construction project. Staff did not review the onsite Storm Water Pollution Prevention Plan (SWPPP) in detail. However, subsequent to the inspection staff reviewed the SWPPP uploaded into the Storm Water Multiple Application and Report Tracking System (SMARTS). Staff identified that the SWPPP had been updated and was complete. The development is a Risk Level 2 project. Staff identified that the SWPPP and SWPPP map specified sediment control BMPs adjacent to the roadway and erosion control BMPs in active and inactive areas (see attached site maps). Additionally, the SWPPP discussed materials management BMPs and waste management BMPs. The inspection was conducted during a substantial rain event. At the time of the inspection, the Qualified SWPPP Practitioner (QSP) was conducting an inspection.

As described below, staff observed active construction areas where perimeter sediment control BMPs required repair or replacement and the lack of erosion control BMPs in active areas. Staff also observed deficient housekeeping BMPs, an uncovered 40-yard dumpster, and a turbid storm water discharge in excess of 1000 Nephelometric Turbidity Unit (NTUs).

Housekeeping BMPs - Staff observed an area under active construction where a pile of stucco waste, trash, and debris was left on the ground without being contained or protected. Storm water was flowing through the pile of stucco and the discharge into the street had an elevated pH measured at 8.7. Staff observed trash and debris throughout the area (see Photos 1 to 3).

Sediment control BMPs and erosion control BMPs - Staff observed multiple areas where the fiber rolls required repair and/or replacement. Many of the fiber rolls were flat and turbid storm water was flowing over the fiber rolls and into the street in multiple locations. Also, staff observed no effective erosion control BMPs in active areas. Storm water around the homes was flowing over

bare soil, discharging over the flattened fiber rolls, and flowing into the street which resulted in turbid storm water flowing into the drain inlets in multiple locations (Photos 4 to 8).

Uncovered 40-yard dumpster - Staff observed an uncovered 40-yard dumpster. The unsealed dumpster contained trash and debris (Photos 9 and 10).

Turbid storm water discharge - Staff observed that turbid storm water discharging into the drain inlets in multiple locations. The storm water discharging into the drain inlets was in excess of 1000 NTUs in many locations. Staff walked down to the discharge channel which is a tributary to Indian Creek. Using the same Hach 2100P turbidity meter staff determined the turbidity from the outfall was in excess of 1000 NTUs (Photos 11 to 14).

Finished homes not stabilized with BMPs - Staff observed that the many of the homes which were sold had not been stabilized with erosion control BMPs. Most of the homes had bare soil which contributed to turbid discharges from the development. The SWPPP noted that the Calaveras County has a Phase II MS4 Permit. However, the County does not have an approved Post-Construction Standards Plan and the County did not condition this project with any post-construction design features. The SWPPP stated that, according to the State Water Board's Water Balance Calculator in SMARTS, as long as the non-built portions project are covered with at least 75% coverage of lawn, grass, landscaping, and trees, the Construction General Permit's Post-Construction requirements for this project will be met. Most of the finished homes did not have lawn, grass, landscaping, or trees. The SWPPP map stated that the completed home lots will be stabilized with either hydroseeding or landscaping. However, this is not occurring on the majority of the completed homes.

Signature



Date

Date Entered: \_\_\_\_\_  
Entered By: \_\_\_\_\_  
Senior Review: \_\_\_\_\_



Photo 1. View of poor good housekeeping practices. Note: the runoff from the stucco waste pile had elevated pH.



Photo 2. Another view of the same area. Note: the storm water discharging offsite and the trash and debris.



Photo 3. Another area where the BMPs required repair and/or replacement. Note: the trash and debris.



Photo 4. Another area where sediment control BMPs required repair and/or replacement and the lack of erosion control BMPs.



Photo 5. Another area where the BMPs required repair and/or replacement. Note: the lack of erosion control BMPs.



Photo 6. Another view of the same area. Note: the turbid storm water flowing in the gutter.



Photo 7. Another home where the BMPs required repair and/or replacement.



Photo 8. Another view of the same home. Note: the light application of straw mulch.



Photo 9. Uncovered 40-yard dumpster.



Photo 10. View of the trash and debris inside the uncovered 40-yard dumpster.



Photo 11. Turbid storm water flowing into one of the drain inlets. Note: the turbidity was greater than 1000 NTUs.



Photo 12. Turbid storm water flowing from the outlet at the bottom of the slope.



Photo 13. Another view of turbid storm water in excess of 1000 NTUs discharging downslope and flowing into a tributary to Indian Creek.



Photo 14. Storm water in the tributary to Indian Creek mixing with the turbid storm water from the outfall shown in photographs #12 and #13.

## Storm Water Construction General Permit Inspection Report Central Valley Regional Water Quality Control Board

Insp. Date & Time:	02/07/2017	Inspected By:	Rich Muhl
WDID #	5S05C376000	Site County:	Calaveras
Operator Name:	Gold Creek Homes		
Facility Name:	Gold Creek Woodgate Estates		
Facility Address:	Hwy 26 and Vista Del Lago Drive, Valley Springs, CA 95252		
Facility Contact:	Ryan Voorhees (209) 367-1706		

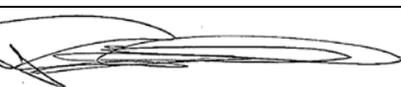
Inspection Type: <input checked="" type="checkbox"/> Enforcement follow-up			
SWPPP on site?	Unknown	SWPPP Implemented/Updated?	No
Photos Taken?	Yes	Appropriate Monitoring Program?	Yes
Weather:	Rain	Evidence of SW or Non-SW Discharge?	Yes

### Inspection Summary / Comments:

On 7 February 2017, Central Valley Regional Water Quality Control Board staff re-inspected the Gold Creek Homes, Gold Creek Woodgate Estates construction project. Staff did not review the onsite Storm Water Pollution Prevention Plan (SWPPP) in detail. The inspection was conducted during a heavy rain event.

During the site inspection, staff observed active construction areas where some of the sediment control BMPs had been replaced with new fiber rolls. However, staff observed multiple areas where the fiber rolls still required repair and or replacement. Staff observed a light application of straw mulch in a few areas but observed that most active areas did not have erosion control BMPs. Staff observed that the 40-yard dumpster had been covered with a tarp however the tarp had fallen into the dumpster and was largely ineffective. Staff observed that good housekeeping had improved throughout the project. A turbid storm water discharge was observed flowing into multiple drain inlets. The turbid storm water discharge was in excess of 1000 Nephelometric Turbidity Unit (NTUs) (see Photos 1 to 12). Photo 12 also shows an occupied home without soil stabilization or landscaping as specified in the SWPPP.

Signature



Date 02/08/2017

Date Entered: \_\_\_\_\_  
 Entered By: \_\_\_\_\_  
 Senior Review: \_\_\_\_\_



Photo 1. Area where the fiber rolls required repair and/or replacement.



Photo 2. Area where fiber rolls have been replaced and a light application of straw mulch had been applied.



Photo 3. Area where new fiber rolls were installed on the project. Note: the lack of erosion control BMPs.



Photo 4. Area where the fiber rolls still required repair and or replacement.



Photo 5. Another area where the fiber rolls required repair and or replacement Note: the lack of erosion control BMPs.



Photo 6. Active area of construction where fiber rolls had been replaced. Note: the light application of straw mulch.



Photo 7. Another area where the fiber rolls required repair and or replacement.



Photo 8. Another view of the same area. Note: the lack of any erosion control BMPs.



Photo 9. Another area with new fiber rolls but without erosion control BMPs.



Photo 10. Additional area with new fiber rolls but without erosion control BMPs.



Photo 11. 40-yard dumpster which had been covered with a tarp. Note: the tarp had fallen into the dumpster and was largely ineffective.



Photo 12. Turbid storm water flowing into the drain inlet on the lower end of the project. Note: the turbidity was in excess of 1000 NTUs.

Settlement Offer  
Gold Creek Homes  
Woodgate Estates  
Calaveras County

Attachment B: Calaveras County Notices of Violation dated 3 February and 16 February  
2017



## NOTICE OF VIOLATION

February 3, 2017

Ryan Voorhees  
Via email

SUBJECT: Earthwork at Woodgate Subdivision, Valley Springs

### ***INSPECTION SUMMARY***

On February 3, 2017 Public Works staff inspected the subject site to evaluate compliance with local storm water and grading ordinance. Based on staff's review of project files and site conditions, the following was noted:

- ***Inadequate construction site Best Management Practices (BMPs).*** While limited erosion and sediment control measures have been installed, they do not meet the minimum standards specified in Section 6.2 of the *Design Manual*.
  - Poor to non-existent good housekeeping measures were observed throughout the site.
  - Installed sediment controls were damaged.
  - Sediment controls were missing in various areas.
  - Erosion control measures were lacking. Many home sites had little or no soil protection.
  - Trash containers are not properly covered.

Please see attached pictures for general condition of site.

On January 17, 2017 the County inspected the site and noted that all DI had protection bags around them. Today's inspection revealed that sediment laden runoff was not being effectively controlled by the protection bags. This is an illicit discharge to stormwater, which is a violation of Storm Water Quality Ordinance (Section 13.01.040 A county code).

### ***CORRECTIONS NEEDED***

In response to this Notice, all issues regarding good housekeeping measures, sediment and erosion controls must be corrected by **Friday, February 10, 2017** or the next rain event, whichever is sooner.



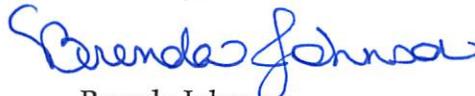
Note that at the time of the January 17, 2017 inspection the site seemed to be in a somewhat better condition as noted by the report (example: tarp covering waste container, etc.) You must take measures to ensure ongoing maintenance of BMPs.

The Calaveras County Grading Ordinance and Design Manual are available at the Public Works office or online at: [http://www.co.calaveras.ca.us/public\\_works.asp](http://www.co.calaveras.ca.us/public_works.asp).

California Stormwater BMP Handbook, Construction, can be found online at ([WWW.cabmphandbooks.com](http://WWW.cabmphandbooks.com)).

Please call if you have any questions or need further clarification.

Sincerely,



Brenda Johnson  
Analyst

RJP/blj

Enclosures: Photographs

cc: Rich Muhl, Central Valley RWQCB  
Jennifer Epperson, Environmental Consulting













**NOTICE OF VIOLATION**

February 16, 2017

Ryan Voorhees  
Via email

SUBJECT: Earthwork at Woodgate Subdivision, Valley Springs

***INSPECTION SUMMARY***

On February 14, 2017 Public Works staff inspected the subject site to evaluate compliance with local storm water and grading ordinance. Based on staff's review and site conditions, the following was noted:

- ***Inadequate construction site Best Management Practices (BMPs).*** While limited erosion and sediment control measures have been installed, they do not meet the minimum standards specified in Section 6.2 of the *Design Manual*.
  - Poor good housekeeping measures were observed throughout the site.
  - Sediment controls were missing in various areas.
  - Erosion control measures were lacking.
  - Trash containers are not properly covered.

***CORRECTIONS NEEDED***

In response to this Notice, all issues regarding good housekeeping measures, sediment and erosion controls must be corrected by **Tuesday, February 28, 2017** or the next rain event, whichever is sooner.

The Calaveras County Grading Ordinance and Design Manual are available at the Public Works office or online at: [http://www.co.calaveras.ca.us/public\\_works.asp](http://www.co.calaveras.ca.us/public_works.asp). California Stormwater BMP Handbook, Construction, can be found online at ([WWW.cabmphandbooks.com](http://WWW.cabmphandbooks.com)).

Please call if you have any questions or need further clarification.

Sincerely,  
  
Brenda Johnson  
Analyst

RJP/blj

Enclosures: Staff Report and Photographs

cc: Rich Muhl, Central Valley RWQCB  
Jennifer Epperson, Environmental Consulting



Calaveras County
Public Works

CONSTRUCTION SITE
INSPECTION MONITORING
STORM WATER MANAGEMENT PROGRAM

APN: N/A
Project: Woodgate Subdivision
Location: Valley Springs
Contractor: Gold Creek Homes
Contact: Dave Justice
Phone: (209) 912-9798

Date: 2-14-2017 Time: 10:00 A.M.
Weather: Clear & Cool
Inspector: Scott McReynolds
Type of Project: Subdivision
Description of Work: Grading
Site is: Active

Reason for site visit: Follow-up:

SWPPP Required (>1acre) [X] Yes [ ] No || SWPPP on Site [X] Yes [ ] No || SWPPP Complete [X] Yes [ ] No

GENERAL CONSTRUCTION N.P.D.E.S PERMIT REQUIREMENTS

Eliminate or minimize discharges from the construction site to storm drains and water bodies

- Discharges resulting from rain events.
Non-storm water discharges resulting from dumping, leaking storage and maintenance areas and spillage of chemicals and waste materials.

Develop and implement an effective Storm Water Pollution Prevention Plan (SWPPP) for the site, before construction begins!

- SWPPP should be dynamic, defensible and a living document.
Implement effective best management practices.
Monitor the site and perform inspections of control practices implemented as part of your SWPPP.
Document the inspections and the results, as well as corrective action.

The objective of general permit is to control discharges from the construction site to storm drains and water bodies.

SITE INSPECTION:

Good Housekeeping [X] Yes [ ] No || Condition of Entrance [ ] Good [X] Fair [ ] Bad
Erosion Control in place [X] Yes [ ] No || Washout Area [X] Yes [ ] No
Soil, Dirt and Sediment Control in place [X] Yes [ ] No || Any Illicit Discharge [ ] Yes [X] No

COMMENTS: SWPP inspection was completed on this date. Items that need to be addressed are [ ] None [X] Described below:

\*\*\*Items [X] need to be addressed prior to next inspection\*\*\*

Table with 2 columns: Photo, BMP Description. Includes items 1-6 with checkboxes and descriptions of BMPs like SE-5-Fiber rolls, WM-All porta potties, SE-10-All protection bags, etc.

Please complete all items listed no later than 2/28/17 or prior to the next rain event. Thank you in advance for your cooperation. If you have any questions, please contact Public Works at (209) 754-6402 or visit

http://www.co.calaveras.ca.us/departments/public\_works.asp

RESULTS OF INSPECTION: [ ] Good [ ] Needs Improvement [ ] Notice of Correction
[ ] Notice of Non-Compliance [X] Notice of Violation [ ] Stop Work

**BMP Legend**

Reference: California Stormwater BMP Handbook Construction [www.cabmphbooks.com](http://www.cabmphbooks.com)

EC:	Erosion Control	TC:	Tracking Control	
SE:	Sediment Control	NS:	Non Storm Water Discharges	
WE:	Dust Control	WM:	Waste Management	
EC-3 Hydraulic Mulch	EC-11 Slope Drains	SE-7 Street Sweeping and Vacuuming	TC-2 Stabilized Const. Roadway	WM-5 Solid Waste
EC-4 Hydro-seeding	EC-12 Stream bank Stabilization	SE-8 Sandbag Barrier	NS-4 Temporary Stream Crossing	WM-7 Contaminated Soil
EC-6 Straw Mulch	SE-1 Silt Fence	SE-9 Street Sweeping and Vacuuming	NS-10 Vehicle & Equipment Maintenance (ample supply of clean-up material)	WM-8 Concrete Waste Management
EC-7 Geo-textiles & Mats	SE-2 Sediment Basin	SE-10 DI Protection	WM-1 Material Delivery and Storage	WM-10 Liquid Waste Management
EC-8 Wood Mulching	SE-4 Check Dam		WM-2 Material Use	
EC-9 Earth Dikes and Drainage Swales	SE-5 Fiber Rolls	WE-1 Wind Erosion Control	WM-3 Stockpile Management	
EC-10 Velocity Dissipation Devices	SE-6 Gravel Bag Berm	TC-1 Stabilized Const. Entrance	WM-4 Spill Prevention and Control	

REMEMBER: BMPS ARE TO BE IN PLACE AND MAINTAINED ALL YEAR ROUND.

Applicable Calaveras County Codes are available at the Public Works website.  
[http://www.co.calaveras.ca.us/departments/public\\_works.asp](http://www.co.calaveras.ca.us/departments/public_works.asp)

Chapter 13.01; Storm Water Quality  
 Chapter 15.05; Grading and Drainage Ordinance

891 Mountain Ranch Road ♦ San Andreas ♦ CA ♦ 95249-9709  
 Customer Service (209) 754-6402 ♦ Fax (209) 754-6664 ♦ Email: [pubworks@co.calaveras.ca.us](mailto:pubworks@co.calaveras.ca.us)  
 Web: [http://www.co.calaveras.ca.us/departments/public\\_works.asp](http://www.co.calaveras.ca.us/departments/public_works.asp)



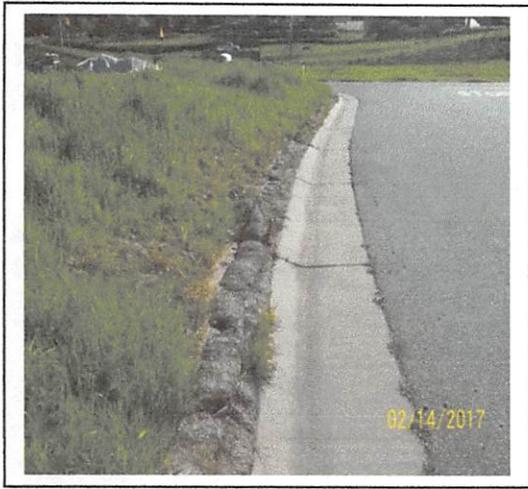


Photo 1

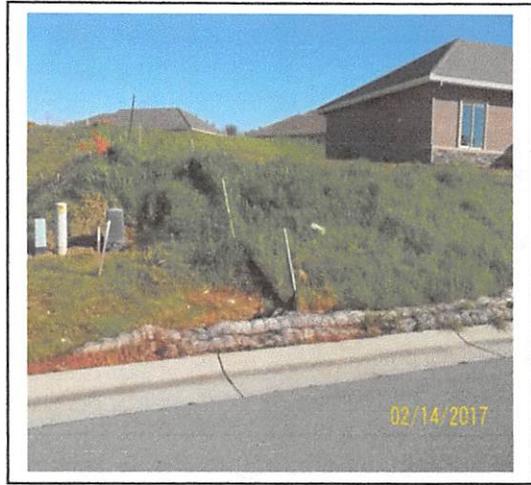


Photo 4



Photo 2

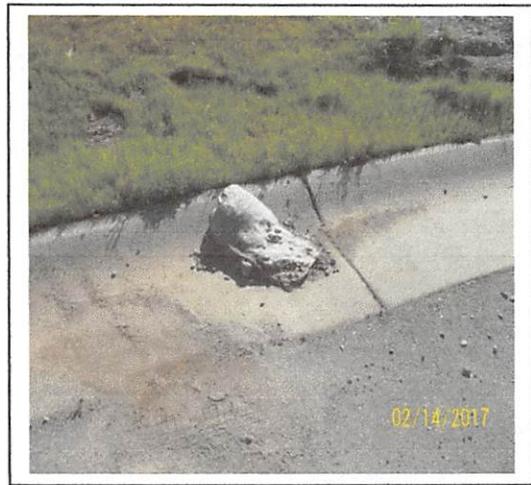


Photo 5



Photo 3



Photo 6