



North Coast Regional Water Quality Control Board

January 23, 2020

Moises Roman
3200 A Danville Blvd., Ste. #200
Alamo CA, 94507

Certified Mail No. 7016 0750 0001 0048 7501

Michael Hinojosa
3200 A Danville Blvd., Ste. #200
Alamo CA, 94507

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Chris Wilson
147 Briar Place
Danville CA, 94526

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Dear Mr. Roman:

Subject: Notice of Violation, Directive to Obtain Regulatory Coverage for Cannabis Cultivation, and Transmittal of Inspection Report for September 5, 2019, Inspection of Humboldt County Assessor's Parcel No. 530-151-001-000

File: Cannabis Program Inspections, Humboldt County, September 2019 HCSO CAMP Inspections, "Chris Wilson" property, owned by Michael Hinojosa, CIWQS Place ID 842969

This letter is to notify you of observed violations of the requirements listed below for unauthorized discharges to waters of the state from the above-referenced parcel (Property):

California Water Code (Water Code) sections 13260 and 13264

Water Quality Control Plan for the North Coast Region (Basin Plan) section 4.2.1 Prohibitions 1 and 2

This letter directs you, within 30 days, to take action to comply with Water Code 13260. In addition, this letter directs you, within 30 days, to contact Regional Water Board staff to advise of your plan to implement recommendations in the attached report.

VALERIE L. QUINTO, CHAIR | MATTHIAS ST. JOHN, EXECUTIVE OFFICER

Background

On September 5, 2019, staff from the North Coast Regional Water Quality Control Board (Regional Water Board), accompanied by personnel from the California Department of Fish and Wildlife (CDFW), State Water Resources Control Board Division of Water Rights, and various law enforcement agencies, inspected the subject Property. The purpose of the inspection was to evaluate onsite development and conditions, and to identify and assess any impacts or threatened impacts to the quality and beneficial uses of waters of the state.

Attached is a copy of the water quality inspection report (September 5, 2019, Inspection Report). Please review the inspection report carefully and completely. The inspection report contains recommendations for correcting observed violations and water quality concerns observed on the Property and advises you of the Regional Water Board permits necessary for instream work and projects/activities that result in discharges of waste to receiving waters.

Relevant Requirements

During the inspection, Regional Water Board staff observed features and conditions on the Property that represent violations of water quality requirements and regulations. Attachment A – Regulatory Citations, provides references to these requirements and regulations.

Observed Violations

As documented in the inspection report, Regional Water Board staff observed cannabis cultivation and associated site disturbance of sufficient size and scope to require regulatory coverage under State Water Resources Control Board (State Water Board) Order No. WQ-2019-0001-DWQ, *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (Statewide General Order). The Regional Water Board has no record of this Property's enrollment under the Statewide General Order. Outdoor cannabis cultivation activities in California with land disturbance of 2,000 square feet or more that are not enrolled for coverage under the Statewide General Order or individual waste discharge requirements violate Water Code section 13260.

Staff also observed violations of Water Code sections 13260 and 13264 associated with unauthorized discharge of waste into Big Foot Creek and/or its tributaries at the Property locations identified as WQ 6, WQ 7, WQ 8, and WQ 9. Furthermore, the earthen fill placed in the watercourses at WQ 6 is a violation of the Basin Plan Section 4.2.1, Prohibition 1 and the threat of earthen materials at this location to continue to discharge to receiving waters represents a violation of the Basin Plan Section 4.2.1, Prohibition 2.

Additional Potential Liabilities

The Regional Water Board is in the process of considering whether the violations of the Water Code and the Basin Plan warrant further enforcement. We encourage you to take

steps, to correct the violations as soon as possible, securing any applicable permits from this and other agencies prior to conducting work. Please note that the existing conditions, as observed and documented in the Inspection Report, may represent continuing violations of the Water Code and the Basin Plan.

Please note that correcting the conditions of non-compliance at the Property does not preclude enforcement for the violations alleged in this notice. As noted above, the Regional Water Board reserves its right to fully enforce the law against any violation and threatened violation by taking enforcement actions such as a cleanup and abatement order, time schedule order, administrative civil liabilities, and referral to the California Attorney General's office. Administrative civil liabilities may be assessed on a daily basis in the amount up to \$5,000 for each day the violation occurs or up to \$10 per gallon, but not both pursuant to Water Code section 13350.

Directive to Obtain Regulatory Coverage

Based on the observations detailed in the attached inspection report, and mentioned above, the Regional Water Board has determined that you are required to comply with Water Code section 13260 by taking one of the following actions within **30 calendar days of this letter**:

- 1) Enroll the property under the Statewide General Order by providing the information required in the online application process. The application can be accessed at: <https://public2.waterboards.ca.gov/cgo> You must also submit an application fee to the State Water Board within 30 days of submitting the online application. The fee must be submitted to one of the following addresses, based on the method of delivery.

By U.S. Mail:	In person or by courier delivery:
Accounting Office Attn: Water Quality Fees – Cannabis General Order P.O. Box 1888 Sacramento, CA 95812-1888	Accounting Office Attn: Water Quality Fees – Cannabis General Order 1001 I Street Sacramento, CA 95814

- 2) File a Report of Waste Discharge in order to obtain individual Waste Discharge Requirements (WDRs) specific to your property.

Please submit the appropriate documents and payments to:

North Coast Water Board
Attn: Diana Henriouille
Cannabis Waste Discharge Regulatory Program
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

OR

- 3) If you believe regulatory coverage is not required under any of the options listed above, either because **there is no cultivation** or associated activities occurring, or because the operations that are occurring are not subject to regulation under the Statewide General Order or individual WDRs, please **provide a written response** explaining your non-applicability (with all supporting documentation including photos if necessary) to the Regional Water Board at the address provided above. Regional Water Board staff may contact you to verify your response.

Water Code section 13260 states, in relevant part:

(a) Each of the following persons shall file with the appropriate regional board a report of the discharge, containing the information which may be required by the regional board:

- (1) Any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system.

Water Code section 13264 states, in relevant part:

(a) No person shall initiate any new discharge of waste or make any material changes in any discharge...prior to the filing of the report required by Section 13260 and no person shall take any of these actions after filing the report but before whichever of the following occurs first:

- (1) The issuance of waste discharge requirements pursuant to Section 13263.

Failure to comply with Water Code sections 13260 and 13264 may result in an administrative civil liability under Water code sections 13261 and 13265 not to exceed \$1,000 per violation for each day in which each violation occurs.

Inspection Report Recommendations

As mentioned above, the September 5, 2019 Inspection Report provides recommendations to correct violations, as well as to address features and conditions that threaten to impact water quality. **Within 30 days of this letter**, please advise Brian Fuller of your intentions, plan, and schedule to implement recommendations in the inspection report. Brian Fuller can be reached at (707) 576-2806 or by email at Brian.Fuller@waterboards.ca.gov.

Future correspondence regarding this matter will be sent to you at this address unless an alternative address is provided to the Regional Water Board. Failure to accept mail from the Regional Water Board is not a valid excuse for non-compliance with any future enforcement orders, and a failure to respond or otherwise appear at a future enforcement proceeding could subject you to a default order and the imposition of administrative civil liability.

January 23, 2020

If you have any questions regarding this matter, please contact Brian Fuller at the phone number or email above. You may also contact me at Diana.Henriouille@waterboards.ca.gov or by phone at (707) 576-2350. Additionally, we are available to meet with you if you wish to discuss this letter, in inspection report, or our waste discharge regulatory programs in further detail.

Sincerely,

Diana Henriouille, P.E.
Enforcement Unit

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Attachments: Attachment A – Regulatory Citations
Water Quality Report of September 5, 2019 Inspection

cc: Department of Fish and Wildlife

Warden Joshua Zulliger, Joshua.Zulliger@wildlife.ca.gov
David Manthorne, David.Manthorne@wildlife.ca.gov

Humboldt County Planning and Building Department
PlanningBuilding@co.humboldt.ca.us

North Coast Regional Water Quality Control Board
Kason Grady, Kason.Grady@waterboards.ca.gov
Brian Fuller, Brian.Fuller@Waterboards.ca.gov

State Water Resources Control Board Division of Water Rights
Gagan Bhullar, Gagan.Bhullar@Waterboards.ca.gov
Steven Hall, Steven.Hall@Waterboards.ca.gov
Stormer Feiler, Stormer.Feiler@waterboards.ca.gov

Attachment A – Regulatory Citations

Regulatory Section	Citation
Basin Plan Section 4.2.1, Prohibition 1	Prohibits “[t]he discharge of soil, silt, bark, slash, sawdust, or other organic and earthen material from any logging, construction, or associated activity of whatever nature into any stream or watercourse in the basin in quantities deleterious to fish, wildlife, or other beneficial uses.”
Basin Plan Section 4.2.1, Prohibition 2	Prohibits “[t]he placing or disposal of soil, silt, bark, slash, sawdust, or other organic and earthen material from any logging, construction, or associated activity of whatever nature at locations where such material could pass into any stream or watercourse in the basin in quantities which could be deleterious to fish, wildlife, or other beneficial uses.”
California Water Code Section 13260	<p>“(a) Each of the following persons shall file with the appropriate regional board a report of the discharge, containing the information that may be required by the regional board:</p> <p style="padding-left: 40px;">(1) A person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system.</p> <p style="padding-left: 40px;">(2) A person who is a citizen, domiciliary, or political agency or entity of this state discharging waste, or proposing to discharge waste, outside the boundaries of the state in a manner that could affect the quality of the waters of the state within any region.”</p>
California Water Code Section 13261(a)	“A person who fails to furnish a report or pay a fee under Section 13260 when so requested by a regional board is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).”

Regulatory Section	Citation
California Water Code Section 13264 (a)	<p>“No person shall initiate any new discharge of waste or make any material changes in any discharge, or initiate a discharge to, make any material changes in a discharge to, or construct, an injection well, prior to the filing of the report required by Section 13260 and no person shall take any of these actions after filing the report but before whichever of the following occurs first:</p> <p>(1) The issuance of waste discharge requirements pursuant to Section 13263.</p> <p>(2) The expiration of 140 days after compliance with Section 13260 if the waste to be discharged does not create or threaten to create a condition of pollution or nuisance and any of the following applies:.....</p> <p>(3) The issuance of a waiver pursuant to Section 13269.”</p>
California Water Code Section 13265(a)	<p>“Any person discharging waste in violation of Section 13264, after such violation has been called to his attention in writing by the regional board, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b). Each day of such discharge shall constitute a separate offense.”</p>
California Water Code Section 13350	<p>“A person who (1) violates a cease and desist order or cleanup and abatement order hereafter issued, reissued, or amended by a regional board or the state board, or (2) in violation of a waste discharge requirement, waiver condition, certification, or other order or prohibition issued, reissued, or amended by a regional board or the state board, discharges waste, or causes or permits waste to be deposited where it is discharged, into the waters of the state, or (3) causes or permits any oil or any residuary product of petroleum to be deposited in or on any of the waters of the state, except in accordance with waste discharge requirements or other actions or provisions of this division, shall be liable civilly, and remedies may be proposed, in accordance with subdivision (d) or (e).”</p>

North Coast Regional Water Quality Control Board

TO: Diana Henriouille

FROM: Brian Fuller

DATE: January 7, 2020

Inspection Report for September 5, 2019, Warrant Inspection Humboldt County Assessor's Parcel Number 530-151-001-000

File: Cannabis Program Inspections, Humboldt County, September 2019 HCSC
CAMP Inspections, "Chris Wilson" property, owned by Michael Hinojosa, CIWQS
Place ID 842969

Property information:

County: Humboldt

Physical address: Unknown address on Bluff Creek Mountain Trail, approximately 6 miles north of Weitchpec

APN: 530-151-001-000

Owner: Michael Hinojosa
3200 A Danville Blvd., Ste. #200
Alamo, CA 94507

Transaction History (per LandVision):

- On June 23, 2015; a sale was recorded from United Echogenic, to Michael Hinojosa.
- On October 30, 2019 Michael Hinojosa sold the property to Moises Roman.

Size: 158 acres.

Watershed: Klamath River Hydrologic Unit; Lower Klamath River Hydrologic Area; Orleans Hydrologic Sub Area (HU/HA/HSA 105.12; Table 2-1, Water Quality Control Plan for the North Coast Region).

Aerial Imagery Notes (Google Earth Pro and Digital Map Products' Land Vision)

- Roads and landings visible from earliest available imagery (June 1993); small structures visible on two landings. Similar patterns and no significant changes to site development over subsequent imagery to September 2010. Patterns suggestive of cannabis cultivation visible in June 2013 imagery. Between June 6, 2013, and August 11, 2014, an approximate half-acre cultivation area was developed. Between May 3, 2017, and June 15, 2018, the cultivation area was increased to ~3 acres.

Regulatory status with the North Coast Regional Water Quality Control Board (Regional Water Board):

Site Development: N/A

Applicable programs:

- Regional Water Board's Clean Water Act section 401 Water Quality Certification permit for dredge/fill activities in a surface water
- State Water Board's Construction General Stormwater permit for projects involving the disturbance of an acre or more of land
- Regional Water Board's waste discharge regulatory program for timber harvesting on private forest land

Onsite activities/operations: Discharger Chris Wilson enrolled the property for coverage under Regional Water Board Order No. R1-2015-0023, (Regional Cannabis Order), effective July 20, 2017. No annual monitoring report submitted for 2017; Regional Water Board staff issued a Notice of Violation for SMR non-submittal on May 17, 2018. No record of transition to the State Water Board Order WQ 2019-0001-DWQ (Statewide General Order).

Applicable programs: Statewide General Order.

Inspection information:

Date/time: September 05, 2019

Type: Humboldt County Sheriff's Office (HCSO)/Campaign Against Marijuana Planting (CAMP) Warrant Inspection

Attendance:

David Manthorne, California Department of Fish and Wildlife (CDFW)
Personnel from, Humboldt County Code Enforcement and Environmental Health
Steven Hall, State Water Resources Control Board Division of Water Rights (DIV)

Gagan Bhullar, DIV
Brian Fuller, Regional Water Board
Amanda Piscitelli, Regional Water Board

Background/Objective:

Regional Water Board staff (Staff) participated with personnel from HCSO, CDFW, DIV and from various law enforcement agencies in four days of inspections of multiple cannabis cultivation sites in Humboldt County, on September 3-6, 2019. Inspection objectives for Staff included observing site development and activities and identifying and assessing onsite features or conditions that are causing or may cause adverse impacts to the quality and beneficial uses of receiving waters, including surface and ground water.

Inspection Map

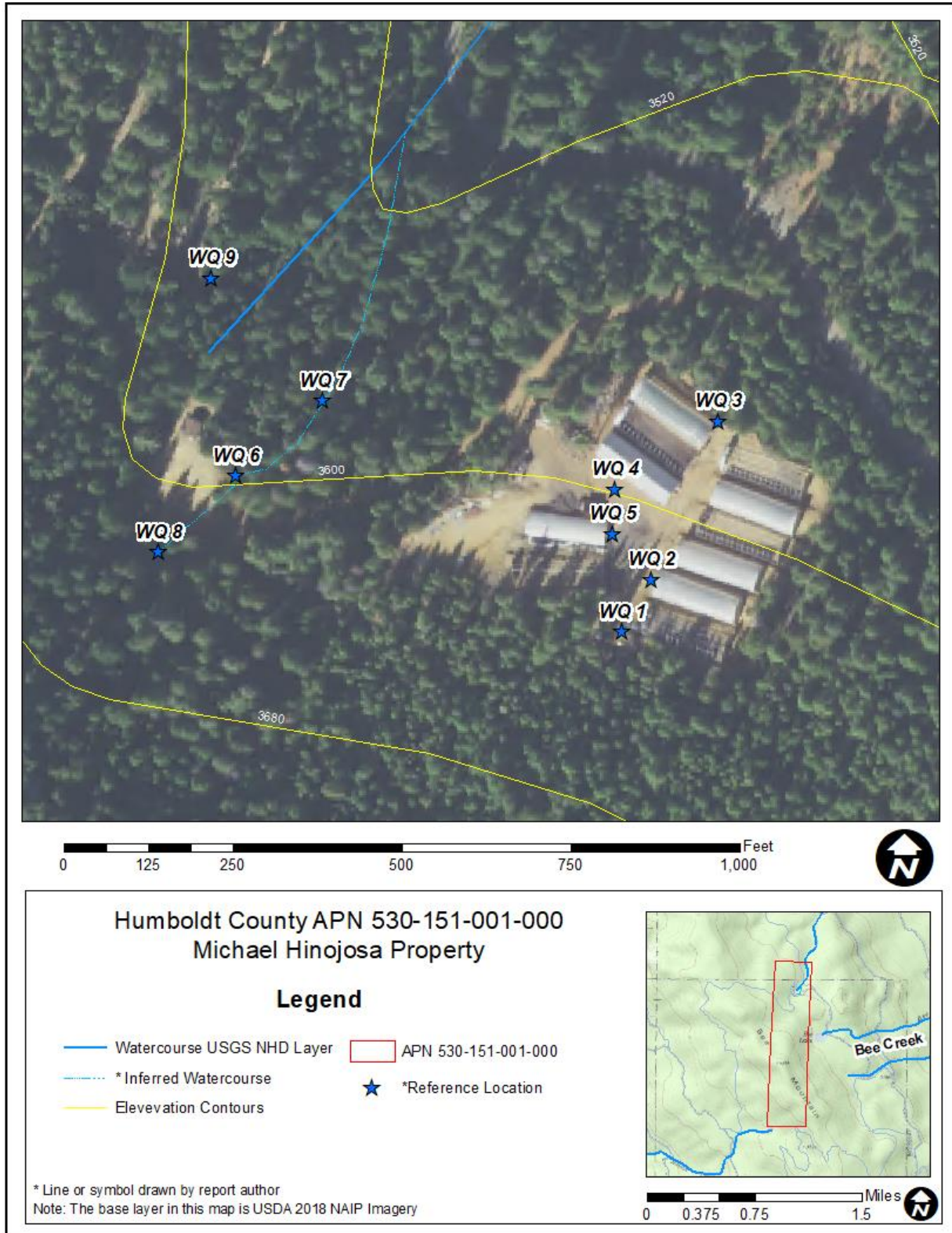


Figure 1: Map of Property, including inspection points of interest.

Inspection Observations:

I accessed the property along a dirt road from the southeast, parked at the west end of an approximate 3 acre cleared flat area and walked east then south to water tanks at WQ 1, (Photo 1). Water was leaking from the tanks and flowing northeast. I observed fertilizers sitting uncovered, on bare ground in this area and a 1-gallon bottle resting label-down in the water. I noted a green hue in the water which I interpreted to be from algae, suggesting that the nutrients were being mixed in the tanks. I walked past the greenhouses with active cannabis cultivation (WQ 2) (Photo 2) to the northeast of the cleared area at WQ 3 and observed that the edge of the pad was composed of mixed earth and woody debris which was perched above a forested hillslope (Photo 3).

I walked back south and observed a large pile of greenhouse material with 55-gallon drums with unknown contents (WQ 4) (Photo 4). To the south, at WQ 5, I observed water at the entrance of a greenhouse which I interpreted to be from excess irrigation (Photo 5). The water appeared to have flowed through fuel containers and imported potting soils.

I walked west to WQ 6. Here the road appeared to have been widened with woody debris and trash pushed into the valley to the north (Photo 6). I observed that the northern edge of the road was composed of a loose matrix of earth and woody debris. I walked downhill and observed that immediately downstream from the toe of earthen fill and woody debris there was the form of a channel buried below duff with a width of 3 feet and a depth of 6 inches. I continued walking downstream and observed waste deposited in the channel as far as WQ 7 (Photo 7 through Photo 10).

I then walked upstream from the road in the same watercourse to WQ 8 and observed intermittent locations where surface water had flowed. I also observed several deposits of human feces at locations where they could be easily transported via stormwater runoff into the watercourse channel (Photo 11). I returned to the road and walked to WQ 9, where I observed an outhouse that discharged to Big Foot Creek (Photo 12).

<i>Map point</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
WQ 1	Water tanks	Water from tanks flows over improperly stored chemicals and towards cultivation area.	Threatened discharge of waste to receiving waters.	Photo 1

<i>Map point</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
WQ 2	Cannabis cultivation area	One of nine approximate 6,000 square foot greenhouses. Cannabis visible from outside of structure.	Cannabis cultivation/discharge of waste without a report of waste discharge and/or coverage under State Water Board regulatory order	Photo 2
WQ 3	Edge of graded flat	Edge of graded pad is composed of loose fill mixed with woody debris.	Threatened discharge of waste to receiving waters.	Photo 3
WQ 4	Pile of waste	Includes 50-gallon drums and fuel cans with unknown contents.	Threatened discharge of waste to receiving waters.	Photo 4
WQ 5	Cultivation area	Excess irrigation water flows over improperly stored fuel containers and away from cultivation area.	Threatened discharge of waste to receiving waters.	Photo 5
WQ 6	Road-fill on top of watercourse.	Composed of loose fill mixed with woody debris. Suspected watercourse upstream and downstream.	Unauthorized dredge/fill in surface water.	Photo 6
WQ 7	Landfill	Waste including household appliances discharged in watercourse	Unauthorized discharge of waste to receiving waters.	Photo 7 through Photo 10
WQ 8	Human feces	Several piles of human feces and soiled toilet paper within banks of an intermittent watercourse.	Unauthorized discharge of waste to receiving waters.	Photo 11

<i>Map point</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
WQ 9	Outhouse	Outhouse pipe discharges directly to a watercourse. There is an uncontained pile of soiled toilet paper behind the outhouse.	Unauthorized discharge of waste to receiving waters.	Photo 12

A comparison of conditions observed on the site with categories of activities typically associated with water quality concerns at cannabis cultivation sites:

1. Site maintenance, erosion control and drainage features:

Fill on cultivation pads (WQ 3) and on roads (WQ 6) include woody debris in the matrix and display evidences of eroding.

2. Stream crossing maintenance and improvement:

Surface flow may occur around WQ 8, however there does not appear to be any infrastructure for flows to cross the road to WQ 6.

3. Stream and wetland buffers:

I did not identify any natural watercourses in the cultivation area located at points WQ 1 through WQ 5. The features at WQ 6 through WQ 9 are either within, or very close to Big Foot Creek and/or its tributaries.

4. Spoils management: The road fill at WQ 6 is within and/or threatens to discharge to Big Foot Creek and/or its tributaries.

5. Water storage and use: Water tanks at WQ 1 were leaking and transporting fertilizers across the property.

6. Irrigation runoff: Excess irrigation at WQ 5 appears to have flowed past fuel containers and out of the cultivation area.

7. Fertilizers and soil amendments: Fertilizers were stored uncontained outdoors near WQ 1.

8. Pesticides: Staff did not identify any pesticides.

9. Petroleum products and other chemicals: Unknown waste in 55-gallon drums at WQ 4 and in the landfill at WQ 7 may contain chemicals.

10. Cultivation-related wastes: The large pile of waste at WQ 4 included greenhouse materials and other unknown materials.

11. Refuse and human waste: As noted above, I observed a landfill between WQ 6 and WQ7 with waste placed where it is likely to be transported to Big Foot Creek. Human feces at WQ 8 are likely to contaminate local surface water, and the outhouse at WQ 9 discharges directly towards Big Foot Creek.

Recommendations

1. Retain a licensed professional to inventory, assess, and develop a workplan and schedule to implement measures to ensure that all developed features, roads, watercourse crossings, and cultivation areas throughout the Property are corrected, restored, and/or maintained in conditions that prevent or minimize erosion, sediment transport/delivery, and adverse impacts to water quality and beneficial uses. Include measures to ensure that unstable features caused or affected by onsite development and operations are removed or otherwise protected so as to minimize the potential for these features to cause adverse impacts to water quality and beneficial uses. Dispose of all development and restoration-related earthen spoils in a manner to prevent/minimize transport and delivery to receiving waters.
2. Retain a qualified professional to develop a workplan and schedule to remove the waste between WQ 6 and WQ 7 and restore the channel to its natural state. Dispose of all development and restoration-related earthen spoils in a manner to prevent/minimize transport and delivery to receiving waters.
3. Prior to conducting any instream work associated with recommendations 1 and 2, above, submit to the Regional Water Board an application for Clean Water Act section 401 water quality certification, and secure approval from the Regional Water

Board. The 401 Application may be found at the following hyperlink:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/wqc_docs/031616_401-Application.pdf

4. If the property owner and/or tenant(s) choose to continue to cultivate cannabis, enroll for coverage under and take steps to comply with the requirements of the Statewide General Order (Order WQ 2019-0001-DWQ, General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities). More information about the

Statewide General Order can be found at this hyperlink:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf

5. In the event that the property owner and/or tenant(s) propose in the future to develop or use the Property in a manner or method that will or may result in a discharge of waste to waters of the state in the future, staff recommend that the owner(s)/tenant(s) be aware of and comply with relevant regulatory requirements for water quality protection. For example, Water Code section 13260 requires that a person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system shall file with the appropriate regional board a report of the discharge. Further, Water Code section 13264 states, in part: "No person shall initiate any new discharge of waste or make any material changes in any discharge...prior to the filing of the report required by Section 13260." In addition, projects involving the disturbance of an acre or more of land are subject to regulation under the State Water Board's Construction General Stormwater permit, and projects involving dredge or fill in waters of the United States are subject to regulation under Clean Water Act section 401.

You may find further information about Water Board permits that may apply to proposed site development or land use activities at this hyperlink:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/permit/

6. Discontinue use of and dismantle any outhouse features and work with Humboldt County to ensure that all domestic and human wastes are collected and disposed of consistent with applicable County requirements.
7. Collect and dispose of or contain all refuse and cultivation-related wastes in a location and manner so as to minimize potential for these wastes to enter or be transported into receiving waters.
8. Store and contain all chemicals, including petroleum, fertilizer and/or pesticides properly to prevent spillage and discharge to receiving waters. Provide secondary containment for all petroleum products.

Enforcement Discretion:

The observations in this report will be assessed for violations of the California Water Code. The Regional Water Board and the State Water Board reserve the rights to take any enforcement action authorized by law.

PHOTO APPENDIX



Photo 1—Tanks located at WQ 1



Photo 2—Water from tanks at WQ 1 flowing in front of greenhouse at WQ 2.



Photo 3—Edge of cut and fill pad in the vicinity of WQ 3.



Photo 4—Pile of waste in the vicinity of WQ 4, includes 55-gallon drums with unknown contents.



Photo 5— Water passing through fuel containers and spent potting soils at WQ 5.



Photo 6— Downstream edge of road fill in the vicinity of WQ 6. Note the hole in fill showing woody debris in the matrix of material.



Photo 7— Looking Downstream from WQ6 at woody debris pushed into drainage.



Photo 8— Waste appliances and sealed 5-gallon buckets between WQ 6 and WQ 7.



Photo 9— Waste television between WQ 6 and WQ 7.



Photo 10— Trash bags with unknown contents between WQ 6 and WQ 7.

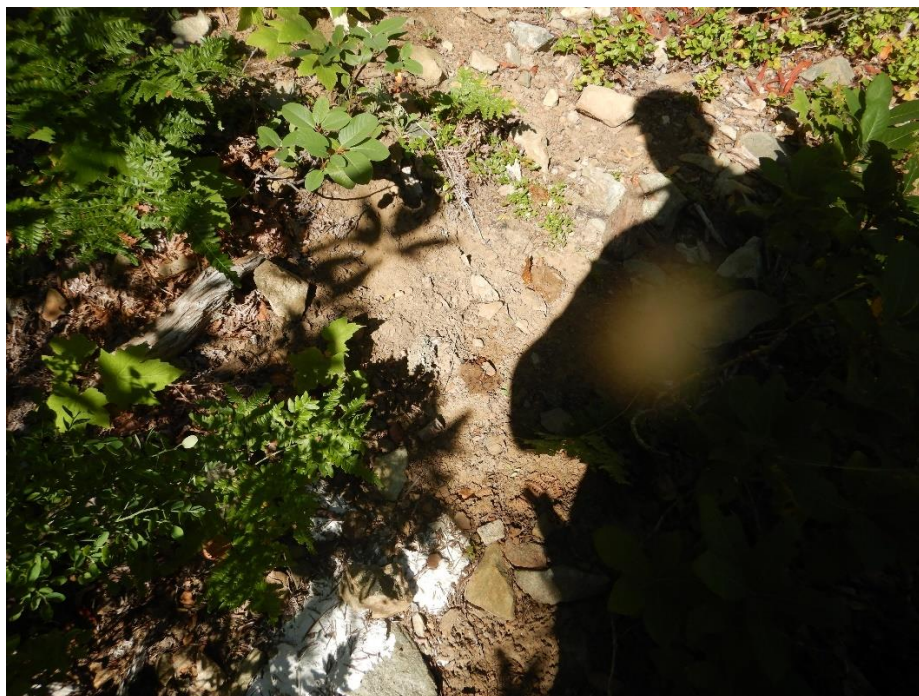


Photo 11— Several piles of human feces and soiled toilet paper deposited in watercourse at WQ 8.



Photo 12— Outhouse discharging human waste where it is likely to enter receiving waters. Note the pile of soiled toilet paper at the back of the structure which is also likely to enter receiving waters.