North Coast Regional Water Quality Control Board

INSPECTION MEMO

Name and Location of Facility Inspected
Ukiah Rifle & Pistol Club, 2300 Vichy Springs Road, Ukiah, Mendocino County

Inspection Date
December 3, 2020

Inspection Time
9:30 AM

Names & Titles of Site Representative
Cheryl Trapani, Ukiah Gun Club staff
David Kindopp, Ukiah Gun Club attorney
Mark Fickes, Ukiah Gun Club attorney
Matt Earnshaw, Ukiah Gun Club consultant
David Noren, Ukiah Gun Club consultant

Consent for inspection Provided?
Therese Cannata , counsel for the Discharger, provided consent via December 2, 2020 email, prior to inspection.

Notified of Inspection?
Yes, Regional Water Board staff provided advance notification to Therese Cannata.

Inspector Name(s) & Affiliation(s)
Farzad Kasmaei, Regional Water Board
Josh Luders, Regional Water Board

Weather Conditions at the Time of the Inspection: Sunny

Site Receiving Water Name(s): Sulphur Creek

Inspection Memo Prepared By: Farzad Kasmaei

A. Background

The Ukiah Rifle & Pistol Club (URPC or Gun Club) is a non-profit organization located at 2300 Vichy Springs Road, in an unincorporated portion of eastern Mendocino County to the east of Ukiah Valley. The Gun Club is located at a latitude and longitude of 39.16418 and -123.16689. The site consists of four outdoor shooting ranges and sheds related to shooting range activities.

Per the attached site map, the topography is mostly a downward gradient to the south toward Vichy Springs Road. The site runoff drains into a roadside ditch along Vichy Springs Road and ultimately discharges into Sulphur Creek which is a tributary to the Russian River.

In response to North Coast Regional Water Board staff request in late 2019, the Gun Club submitted a Storm Water Management and Sampling Plan (SWMSP) on April 10, 2020. After receiving the SWMSP, staff requested the December 3, 2020 inspection in order to evaluate the site conditions and the Best Management Practices (BMPs) installed throughout the site, and to determine whether the proposed sampling locations were appropriately selected to ensure samples would be representative of site discharge.

B. Inspection Narrative and Findings

On December 3, 2020, Regional Water Board staff (referred to as the inspection team) visited the Gun Club to conduct the site inspection.

The inspection team met Gun Club representatives Cheryl Trapani, David Kindopp, Mark Fickes, Matt Earnshaw, and David Noren (together referred to as “Gun Club”) outside of the main building at the parking lot and started our inspection within the drainage area 3 as identified on the attached site map.

The inspection team and Gun Club walked through the shooting range area in DA-1. Staff observed recently installed fiber rolls serving as perimeter control BMPs and as check dams along the rock-lined ditch and the rip rap area (Pictures 1 to 5).

The inspection team proceeded into the pistol area in DA-2. According to the Gun Club, stormwater run-off from this area enters a French drain and culvert and is then discharged into the riprap area where a fiber roll is installed at the low point of the hill side (Pictures 6 & 7).

We inspected the main range area inspected in DA-2, and observed several fiber rolls installed on the slope above the range areal (Picture 9). Runoff generated from this area discharges through a vegetated swale along the west side of the main range, where several hay bales were installed. The runoff drains into a protected inlet at the low point of the swale and is ultimately discharged to sampling point No. 2 via culvert and pipes (Picture 10).

After inspecting the shooting range areas, the inspection team inspected all 3 sampling points. Based on the inspection team's observation, sampling points No. 1 & 2 have the potential to receive concentrated runoff from drainage areas 1 and 2 (Pictures 10 & 12). The runoff at sampling point No. 3 is expected to be in the form of sheet flow (Picture 11).

Recommendations:

- Update SWMSP, Table 4.5 Sample Collection, "Preservation and Analysis for Water Quality Samples" to remove sampling for Oil and Grease and TSS, and revise the analytical methods for Lead to EPA 200.8

- Update SWMSP, Table 4.5 Sample Collection, "Preservation and Analysis for Water Quality Samples" to include field measurement of Turbidity in addition to pH using an appropriate calibrated field meter.

- Add a sampling location to collect samples at internal location(s) where the runoff drains from the shooting range areas to evaluate whether source control may need to be implemented by additional BMP installations.

- Ensure that the proposed 3 discharge sampling points are appropriately located to provide representative samples of stormwater runoff from the site and there are no additional discharge points to be monitored.

- The proposed frequency of sample collection (two samples during each reporting year) stated in SWMSP is inadequate. Consistent with monitoring requirements in the Storm Water Industrial General Permit, the sampling plan must specify that samples be collected from all discharge points during all storm events that generate runoff during business and daylight hours until a total of ten sample sets have been collected. If a rain event does not generate runoff, that should be documented and reported in the Annual Report. It may be necessary to sample over multiple years in order to successfully collect ten samples.

- The SWMSP shall specify all sampling and monitoring locations, site conditions, and installed BMPs, and shall be revised as needed to ensure that the sampling and monitoring plan is appropriately designed to characterize the quality of runoff leaving the site and entering/ discharging into receiving waters.

- All sampling results, lab reports, supporting documentation and amendments to the SWMSP shall be submitted to NorthCoast@waterboards.ca.gov, and cc Farzad Kasmaei at farzad.kasmaei@waterboards.ca.gov

- Revise the SWMSP to indicate the whole drainage system including all culverts, pipes, drop inlets, and French drain(s). Also, show the BMP types and locations on the site map.

- The existing BMPs include riprap, fiber rolls, check dams, inlet protection, and hay bales deployed throughout the site. The newly installed fiber rolls were in good condition and kept in place with wood stakes. The rock-lined drainage ditch and riprap area were clean during the inspection. Installed BMPs appeared to be in good condition and properly installed. However, if sampling results show exceedances for any applicable parameters, Regional Water Board staff may request that the discharger reassess the site to evaluate whether additional BMPs are needed to address the pollutants of concern, and revise the SWMSP accordingly.

Attachment(s):

1. Photos
2. Site map

Photos:

Picture 1- View of the shooting area in DA-1. Fiber rolls installed as a perimeter control BMPs. Picture taken by Farzad Kasmaei.

Picture 2- View of a drain inlet that is protected with fiber rolls in DA-1. The fiber rolls are kept in place with wood stakes. Picture taken by Farzad Kasmaei.

Picture 3- View of the riprap area within Drainage Area 1 (DA-1) where the runoff is discharged on the hill side.

Picture 4- View of the rock lined drainage ditch and installed fiber rolls as check dams in DA-1.

Picture 5- View of the rock lined drainage ditch and the protected inlet in DA-1.

Picture 6- View of the pistol area in DA-2. Picture taken by Farzad Kasmaei.

Picture 7- View of a black pipe that receives the runoff from the pistol area shown in Picture 6 and discharges the water on the rip rap area where a fiber roll has been installed down gradient of the hill side. Located in DA-2. Picture taken by Farzad Kasmaei.

Picture 8- View of a vegetated swale along the west side of the main range area. Several hay bales are installed along the swale. The runoff is discharged into a protected inlet at the low point and drains through a pipe via a culvert. Located in DA-2. Picture taken by Farzad Kasmaei.

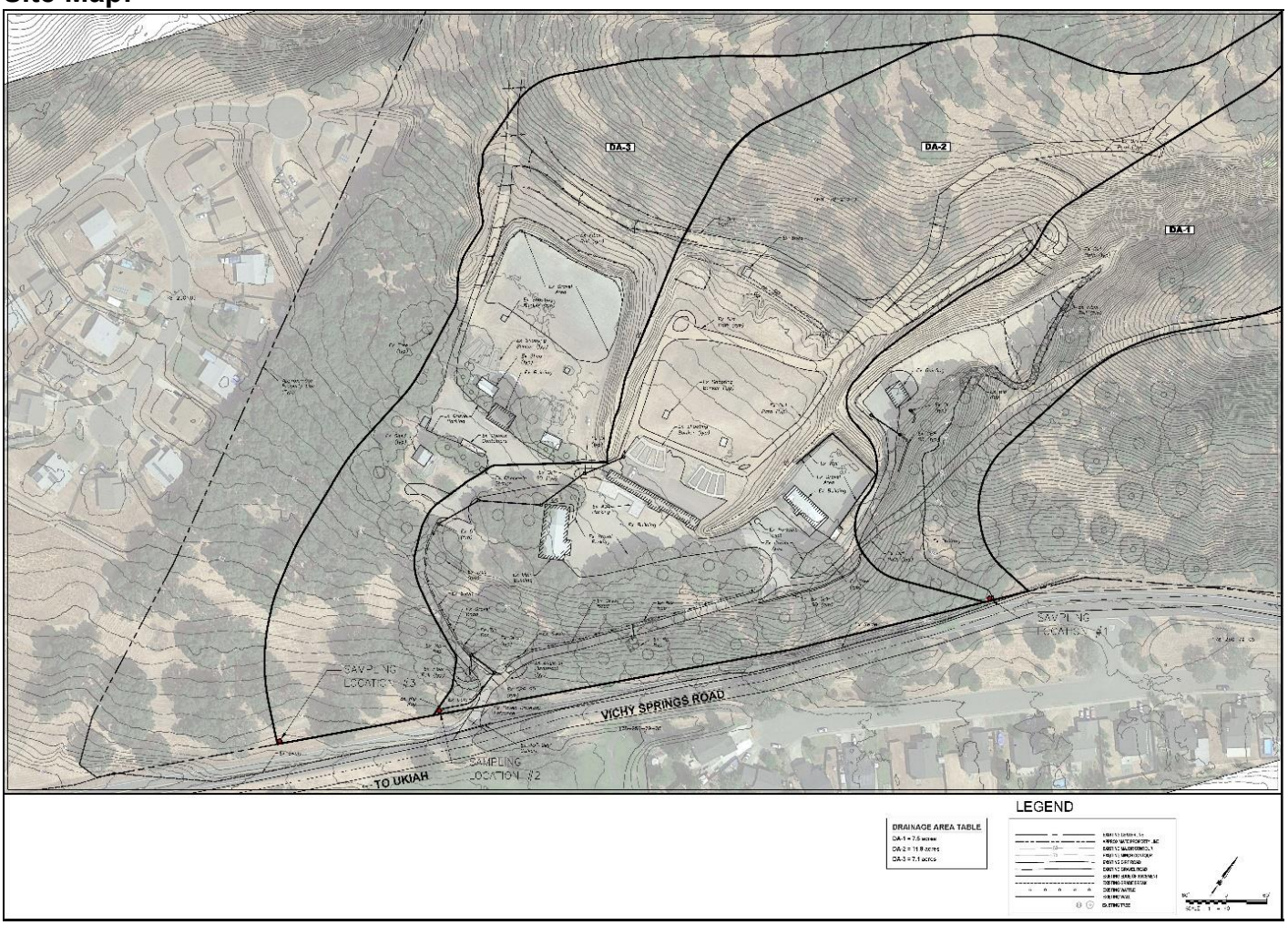
Picture 9- View of the northeast corner of the main range area where several fiber rolls are installed for sediment/erosion control. Located in DA-2 Picture taken by Farzad Kasmaei.

Picture 10 - View of sampling point No. 2. Samples are collected from the small rock-lined ditch show which collects runoff from DA-2. Picture taken by Farzad Kasmaei.

Picture 11 - View of sampling point No. 3. The samples are collected from the small riprap area down gradient of the wattle shown in the picture. Runoff to this discharge point is not concentrated, but rather is anticipated to sheet flow from DA-3 to the approximate location shown. Picture taken by Farzad Kasmaei.

Picture 12 – View of sampling point No. 1 where the run-off from DA-1 is discharged into the shown drop inlet via the swale shown. Picture taken by Farzad Kasmaei.

Site Map:



Picture 13 – Site map, excerpt from SWMSP submitted by the Discharger on April 10, 2020, that shows the drainage areas site features, and all proposed sampling points.