



North Coast Regional Water Quality Control Board

June 22, 2023

Victor Gerardo Silva Vargas
1373 Pegan Comm
Livermore, CA 94550

GLS TRACKING NUMBER 559624466

Dear Victor Gerardo Silva Vargas:

Subject: Notice of Violation, Transmittal of Inspection Report for May 22, 2023, Inspection of Mendocino County Assessor's Parcel Nos. 032-151-07-00 and 032-152-08-00, and Requirement to Respond within 30 days

File: Cannabis Program Inspections, Mendocino County, May 22, 2023, CIWQS Place ID 888782

THIS LETTER REQUIRES THAT YOU ACT WITHIN 30 DAYS

This letter is to notify you of observed violations of the requirements listed below, and cited in Attachment A, at the property identified as Mendocino County Assessor's Parcel Numbers: **032-151-07-00, and 032-152-08-00** (the Property):

1. State Water Resources Control 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* (Cannabis General Order) and State Water Resources Control Board (State Water Board) *Cannabis Cultivation Policy Principles and Guidelines for Cannabis Cultivation* (Cannabis Policy) various provisions
2. Water Quality Control Plan for the North Coast Region (Basin Plan) Section 4.2.1
3. California Water Code (Water Code) Section 13260 and 13264

According to our records, the cannabis cultivation operation located on this Property is not enrolled for coverage under the Cannabis General Order No. WQ 2019-0001-DWQ.

On May 22, 2023, North Coast Regional Water Quality Control Board (Regional Water Board) staff inspected the Property and observed active outdoor cannabis cultivation.

HECTOR BEDOLLA, CHAIR | VALERIE QUINTO, EXECUTIVE OFFICER

Background

LandVision records show that the Property was sold to Victor Gerardo Silva Vargas on March 03, 2021.

On May 22, 2023, staff from the Regional Water Board, accompanied by staff of the California Department of Fish and Wildlife (CDFW), and personnel of various law enforcement agencies, inspected the 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. During the inspection, staff observed cannabis cultivation operations of sufficient size and scope to require regulatory coverage under the Cannabis General Order.

Attached is a copy of the water quality inspection report (Attachment B – Property Inspection Report). Please review the inspection report carefully and completely. The inspection report contains recommendations for correcting observed violations 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 identified several features and conditions on the Property that represent violations of water quality requirements and regulations. Attachment A – Regulatory Citations, provides references to these, and related, requirements and regulations.

Observed Violations

As documented in the May 22, 2023, inspection report, Regional Water Board staff observed violations of the California Water Code, section 13264 (a). In addition, staff observed violations of the Cannabis General Order Attachment A, Section 1 - General Requirements and Prohibitions Nos. 25, 27, 32, and 37 and Section 2 - Requirements Related to Water Diversions and Waste Discharge for Cannabis Cultivation Nos. 3-4, 7-8, 12, 15-17, 22, 23, 24, 26, 28, 31, 38, 39, 48- 56, 59, 60-63, 65, 73, 87, 88, 90, 103, 105, 113, 117, 119-120, 123-126, 128, and 130. Staff observed these violations at Property locations identified in the inspection report as WQ1 through WQ38.

Legal Requirements

The State Water Board adopted the Cannabis Policy and the Cannabis General Order on October 17, 2017, and updates on February 5, 2019, which remain in effect today. The purpose of the Cannabis Policy is to ensure that the discharge of waste and diversion of water associated with cannabis cultivation does not have a negative impact on water quality, aquatic habitat, riparian habitat, wetlands, and springs. The Cannabis Policy applies to cannabis cultivation activities throughout California including, Commercial Recreational, Commercial Medical, and Personal Use Medical. The Policy

does not apply to recreational cannabis cultivation for personal use, which is limited to six plants under the Adult Use of Marijuana Act (Proposition 64, approved by California voters in November 2016).

The Cannabis General Order is the statewide water quality permit that implements the Cannabis Policy through the overarching general Waste Discharge Requirements (WDRs) in accordance with the California Water Code and is available for eligible cannabis cultivators to enroll under. The Cannabis General Order regulates waste discharges from cultivation sites including sediment, irrigation runoff, fertilizers, pesticides/herbicides, petroleum, agricultural related chemicals, cultivation related waste, and refuse. Threats of waste discharge may be from irrigation runoff, over fertilization, pond failure, road construction, grading activities, domestic and cultivation related waste, refuse placement, etc. All commercial cannabis cultivators must obtain coverage under the Cannabis General Order, including for both indoor and outdoor cultivation.

Cultivation activities on the Property requires conformance with the Cannabis Policy and enrollment in under the Cannabis General Order. For more information, please visit our website at: [Cannabis Cultivation Waste Discharge Regulatory Program | California Northcoast Regional Water Quality Control Board](https://www.waterboards.ca.gov/northcoast/water_quality_control_board/cannabis/)
(https://www.waterboards.ca.gov/northcoast/water_issues/programs/cannabis/)

As documented in the inspection report, the site conditions observed on the Property do not meet the requirements of the Cannabis Policy. Please provide a written response supporting documentation, including photos if relevant, explaining how the Property will be restored in compliance with the Policy.

As documented in the inspection report, there are numerous existing stream crossings that must be upgraded or decommissioned to comply with the Basin Plan, which will require a water quality certification prior to conducting instream work.

The application for the water quality certification for cannabis cultivation-related projects is available at: [North Coast Cannabis Water Quality Certification Application](https://www.waterboards.ca.gov/northcoast/water_quality_control_board/cannabis/)
(https://www.waterboards.ca.gov/northcoast/water_issues/programs/cannabis/pdf/200204/RB1_Cannabis_WQC_401_App.pdf)

Additional Potential Liabilities

The Regional Water Board is in the process of considering whether the violations of the California 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 California Water Code and 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 pursuant to Water Code section 13350.

Inspection Report Recommendations

As mentioned above, the Inspection Report provides recommendations to correct the alleged violations, as well as to address features and conditions that threaten to impact water quality.

Within 30 days of this letter, please advise Regional Water Board staff Ermias Berhe of your intentions, plan, and schedule to implement recommendations in the inspection report. If you have questions about what is required of you to comply with the requirements outlined above, and to advise as to your plan and schedule to correct the alleged violations, please contact Regional Water Board staff Ermias Berhe by email at Ermias.Berhe@Waterboards.ca.gov or by phone at 707-445-6128.

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.

You may also contact me at Mona.Dougherty@Waterboards.ca.gov or by phone at 707-445-6129. Additionally, we are available to meet with you if you wish to discuss this letter or our waste discharge regulatory programs in further detail.

Sincerely,

Mona Dougherty, P.E.
Senior Water Resources Control Engineer

Filename 230522_Victor Vargas_NOV_Report

Attachments: Attachment A - Regulatory Citations
Attachment B - Property Inspection Report

Certified Mail – Return Receipt requested

cc: North Coast Regional Water Quality Control Board
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Department of Fish and Wildlife

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Mendocino County Sheriff's Office

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Mendocino County Planning and Permitting

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Megan Dukett, dukettm@mendocinocounty.org

Department of Cannabis Control

Jaime Masuda, jaime.masuda@cannabis.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).”
California Water Code Section 13264(a)	“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: (3) The issuance of waste discharge requirements pursuant to Section 13263. (2) The expiration of 140 days after compliance with Section 13260 if the waste

Regulatory Section	Citation
	to be discharged does not create or threaten to create a condition of pollution or nuisance and any of the following applies... (3) The issuance of a waiver pursuant to Section 13269.”
Cannabis Policy and General Order No. WQ 2019-0001-DWQ	State Water Resources Control Board Cannabis Cultivation Policy and General Waste Discharge Requirements Order No. WQ 2019-0001-DWQ for Discharges of Waste Associated with Cannabis Cultivation Activities Cannabis Cultivation Policy (https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/policy/final_cannabis_policy_with_attach_a.pdf) and Cannabis General Order WQ 2019-0001-DWQ (https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf)

Attachment B – Inspection Report



North Coast Regional Water Quality Control Board

TO: Mona Dougherty

FROM: Ermias Berhe

DATE: June 22, 2023

Inspection Report for May 22, 2023, Warrant Inspection of Mendocino County Assessor's Parcel Numbers 032-151-07-00, and 032-152-08-00

File: Cannabis Program Inspections, Mendocino County, Victor Gerardo Silva Vargas Property, CIWQS Place ID 888782

Property Information

County: Mendocino

APNs: **032-151-07-00, and 032-152-08-00**

Owner: Victor Gerardo Silva Vargas

Size: 120.01 Acres

Watershed: Eel River Hydrologic Unit, Middle Fork Eel River Hydrologic Area, Round Valley Hydrologic Subarea; Cal Water 1111.720201; HUC-12 180101040302

Clean Water Act Section 303(d) Listings: Eel River HU, Middle Fork HA, Round Valley HAS is listed for Sediment/Siltation, Temperature, and Aluminum Pollutants Category 5, in the 2020-2022 Integrated Report approved by the U.S. EPA on May 11, 2022.

TMDLs: The Middle Fork Eel River is listed in the North Coast TMDL Projects for Sediment and Temperature Pollutants. Technical TMDLs for Sediment and Temperature were established by US EPA in December 2003.

May 22, 2023, Inspection Report

Mendocino County APNs **032-151-07-00, and 032-152-08-00****Regulatory Status with the Regional Water Board**

There is no history of enrollment under both the historical North Coast Regional Order No. 2015-0023 and the statewide Cannabis General Order WQ 2019-0001-DWQ for this property.

Inspection information:

Date/time: May 22,2023, 0920-1230

Type: Warrant

Attendance: Ermias Berhe, Engineering Geologist, North Coast Regional Water Board
Daniel Harrington, Environmental Scientist, California Department of Fish and Wildlife (CDFW)

Background/Objective:

Inspection objectives for Regional Water Board staff includes observing site development 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.

From the available Google Earth Pro imagery, a small outdoor cannabis cultivation garden is visible in the southwestern portion of the property in July 2012. Expansion of outdoor cultivation in the north is visible in April 2017. Multiple greenhouses are visible throughout the property, five in the northeast and five in the southwest in July 2021.

Inspection Map

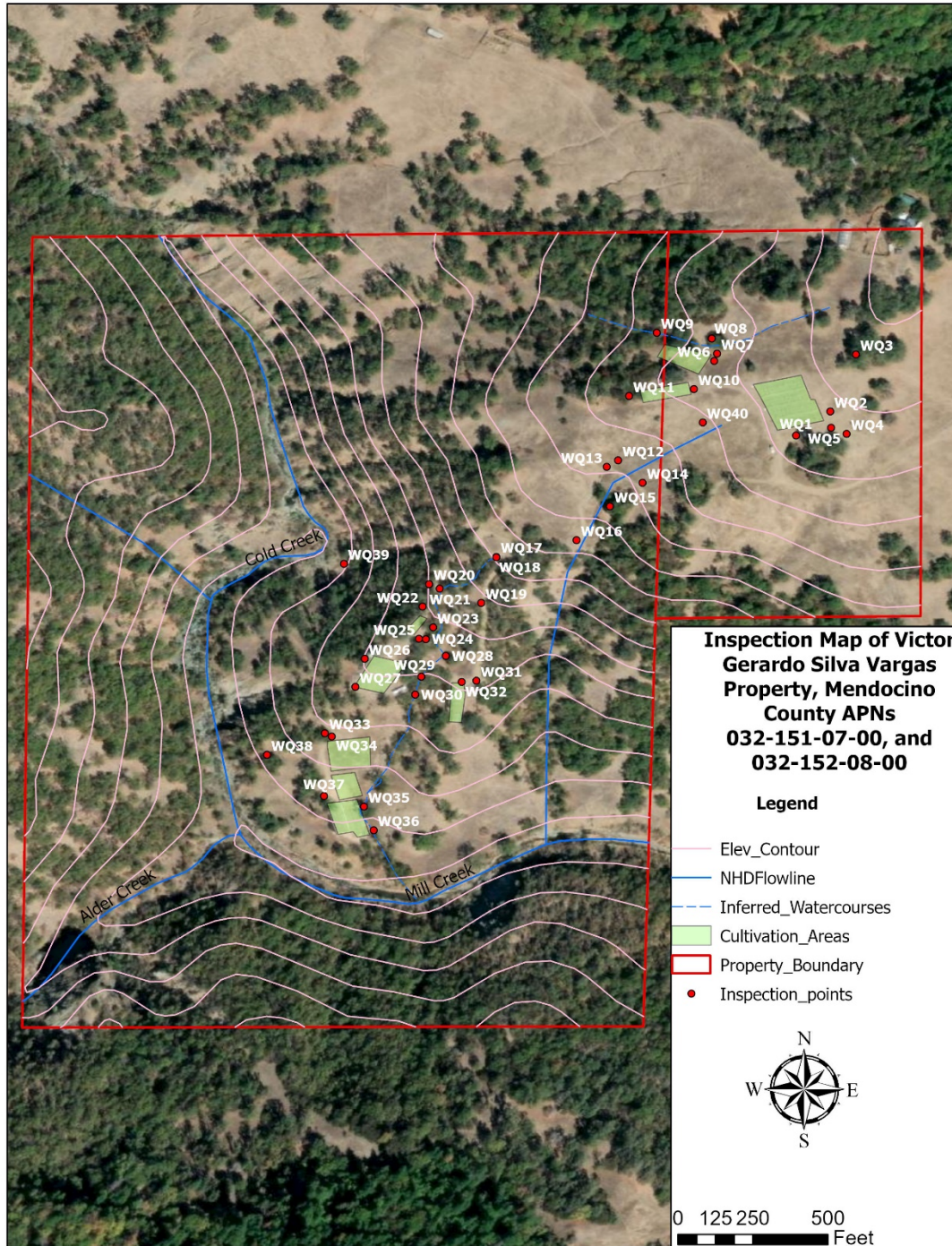


Figure 1: Map of the Property, showing inspection points and cannabis cultivation related activities.

May 22, 2023, Inspection Report

Mendocino County APNs **032-151-07-00, and 032-152-08-00**

Inspection Observations

I inspected the subject property on May 22, 2023. Figure 1 is a site map showing inspection points discussed in Table 1. Below are inspection observations.

Cultivation Areas:

I observed seven cultivation areas on the property at inspection points WQ2, WQ7, WQ10, WQ25, WQ27, WQ32, and WQ34. The total cultivation area is approximately 60,000 square feet.

The cultivation area at WQ2 is located on steep slopes and is threatening sediment and waste delivery to a watercourse, which is a tributary of Mill Creek. Cultivation area WQ7 is within the riparian setback of a Class III watercourse and there was soil nearby the watercourse threatening sediment and waste discharge. The cultivation area west of inspection point WQ35 on the southeastern portion of the property is on top of an unnamed tributary of Mill Creek and is threatening sediment and waste delivery to Mill Creek.

Road Erosion

I observed road erosion and hydrologically connected road sections at inspection points WQ13, WQ16, and WQ19. Specifically, the road section right above WQ13 is eroding and hydrologically connected to surface waters downstream, threatening sediment and waste delivery.

Slope Failure

I observed a slope failure at inspection point WQ17 threatening sediment delivery to a watercourse downstream.

Stream Crossings:

I observed a total of five watercourse crossings throughout the property at inspection points WQ12, WQ13, WQ14, WQ21, and WQ28. The watercourse crossings at WQ12, WQ13, and WQ14 are culverted watercourse crossings. The inlet of the culverted watercourse crossing at WQ12 is clogged with wood and the outlet is set high in the fill and has scour in the stream bed. The culvert at WQ13 is partially rusted, failing, and set high in the fill at the outlet causing erosion and sediment discharge. This crossing is hydrologically connected to an eroding road section and is threatening sediment delivery to surface waters. The culvert at WQ14 is set slightly high at the outlet and the inlet is partially clogged with sediment. The watercourse crossing at WQ21 is a fill crossing on the headwaters of a Class III watercourse. The culvert at WQ28 is partially buried at the outlet and threatening failure.

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Water Storage and Use:

I observed an uncontained water storage bladder at inspection point WQ11. And I observed water storage tanks at inspection points WQ3, WQ6, and WQ22.

I observed a groundwater well at WQ4. I also observed what appears to be abandoned diversion infrastructure at WQ39.

Petroleum Products:

I observed improperly stored gasoline containers, gas tanks, and generators nearby WQ4, WQ6, WQ22, WQ34, and WQ38.

Fertilizers and Soil

I observed uncontained fertilizers nearby water tanks at inspection points WQ3, WQ6, and WQ22. I also observed uncontained potting soil at inspection point WQ5, and near WQ34.

Trash and Spoils

I observed improperly disposed trash at inspection point WQ5, WQ15, WQ18, WQ32, and WQ33. Inspection point WQ15 is on top of a watercourse. I also observed wood and plastic piles at inspection points WQ26, and WQ33.

Refuse and Human Waste

I observed Pit toilets at inspection points WQ20, and WQ38. I also observed what appears to be an open shower and laundry at inspection point WQ23 within riparian setback of a watercourse.

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Mendocino County APNs **032-151-07-00, and 032-152-08-00**

Table 1: Map Points with Descriptions and Water Quality Concerns

<i>Map point</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
WQ2, WQ7, WQ10, WQ25, WQ27, WQ32, and WQ34	Cultivation Areas	Cultivation areas at WQ7 and WQ34 are within required riparian setback and Cultivation area at WQ7 is on a steep slope	Threatened waste discharge to receiving waters	1, 3-11
WQ 12, WQ16, and WQ19	Road Erosion	Road sections with rills and hydrologically connected to watercourses	Discharge of sediment and waste to receiving waters	13-15
WQ12, WQ13, WQ14, WQ21, and WQ28	Stream Crossings	Stream Crossings at WQ12, WQ13, WQ14, WQ21, and 28 are improperly installed or sized, or hydrologically connected to surface waters	Discharge of sediment and waste to receiving waters	16-24
WQ3, WQ6, WQ11, and WQ22	Water Storage	A water storage bladder without a secondary containment at WQ11, water storage tank at WQ22 within required riparian setback	Threatened discharge of waste to receiving waters	25-30
near WQ4, WQ6, WQ22, WQ34, and WQ38	Gasoline Containers, and Generators	Uncontained or improperly stored or disposed petroleum near WQ4 and WQ6, uncontained generators near WQ22 within the required riparian setback	Threatened discharge of waste to receiving waters	30-36

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<i>Map point</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
Near WQ3, WQ6, and WQ22	Fertilizers	Uncontained fertilizers	Threatened discharge of waste to receiving waters	33, 37-38
Near WQ5, and WQ34	Potting Soil	Uncontained/uncovered potting soil	Threatened discharge of waste to receiving waters	39-40
WQ17	Slope Failure	Slope failure threatening sediment delivery to a watercourse downstream at WQ17	Threatened discharge of sediment to receiving waters	41
WQ1, WQ5, WQ15, WQ17, WQ26, WQ32, WQ33, and WQ37	Trash, wood, metal, and plastic piles	Improperly disposed or contained trash, wood, metal, and plastic piles at WQ1, WQ5, WQ15, WQ26, WQ32 and WQ33. WQ15 is within the required riparian setback.	Threatened discharge of waste to receiving waters	8 ,41, 44-48
WQ20, WQ23, and WQ38	Pit toilets, shower, and laundry	Pit toilets at inspection points WQ20 and WQ38, and outdoor shower and laundry at inspection point WQ23 within riparian setback	Threatened discharge of waste to receiving waters	49-51

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

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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 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. 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 Cannabis General Order (CANGO) (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 CANGO can be found at:
[Cannabis General Order WQ 2019-0001-DWQ](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf)
(https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf)
3. Collect and dispose of or contain all refuse and cultivation-related wastes in a location and manner to minimize potential for these wastes to enter or be transported into receiving waters.
4. Discontinue use of and dismantle any outhouse/pit toilet features and work with Mendocino County to ensure that all domestic and human wastes are collected and disposed of consistent with applicable County requirements.
5. Store and contain all chemicals, including petroleum, fertilizer and/or pesticides properly to prevent spillage and discharge to receiving waters.
6. Prior to conducting any instream work associated with recommendation 1 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 Water Quality Certification Application may be found at:

[North Coast Cannabis Water Quality Certification Application](https://www.waterboards.ca.gov/northcoast/water_issues/programs/cannabis/pdf/220615/rb1_cannabis_wqc401.pdf)

(https://www.waterboards.ca.gov/northcoast/water_issues/programs/cannabis/pdf/220615/rb1_cannabis_wqc401.pdf)

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 right to take any enforcement action authorized by law.

PHOTO APPENDIX - All photos taken by Ermias Berhe on May 22, 2023, unless noted otherwise



Photo 1 - Cultivation area at WQ2



Photo 2 - Water storage tanks, and improperly contained Honda generator within required riparian setback of a stream to the left at WQ6. The blue line represents the approximate location of the stream



Photo 3 - Cultivation area within setback of a stream at WQ6, the blue line represents the approximate location of the stream



Photo 4 - Cultivation area at WQ7



Photo 5 – Cultivation area at WQ10



Photo 6 – Cultivation area at WQ25



Photo 7 - Cultivation area at WQ27



Photo 8 – Cultivation area at WQ32 and nearby trash pile



Photo 9 - Cultivation area at WQ34



Photo 10 – The southern edge of cultivation area at WQ34 within required setback of a watercourse shown in blue line and a plastic placed in the stream channel



Photo 11– A watercourse entering a cultivation area at WQ35



Photo 12– View of Mill Creek from the southeastern edge of cultivation area at WQ36



Photo 13- Hydrologically connected and eroded road section at WQ13



Photo 14– Road erosion at WQ16



Photo 15 – Road erosion at WQ19



Photo 16 – Wood covering the inlet of a culverted stream crossing at WQ12



Photo 17– Outlet of the culvert at WQ12



Photo 18 – Inlet of a culverted stream crossing at WQ13



Photo 19 – Outlet of the culvert at WQ13, rusted, failing, and installed high eroding the stream bank



Photo 20 – Inlet of a culverted stream crossing at WQ14, partially clogged



Photo 21– Outlet of the culvert at WQ14, installed high in the fill and eroding the stream bank



Photo 22 – Fill stream crossing at WQ21



Photo 23 - Inlet of a culverted stream crossing at WQ28



Photo 24 - Outlet of the culvert at WQ28, buried



Photo 25 - Water storage tanks at WQ3



Photo 26 - Water storage tank at WQ6



Photo 27 - Water bladder without containment at WQ11



Photo 28 - Water storage tanks at WQ22



Photo 29 - Water storage tanks near WQ22



Photo 30 – Ground water well and uncontained generator at WQ4



Photo 31 - Uncontained generators in the vicinity of WQ22



Photo 32 - Uncontained Motor oil and gasoline containers in the vicinity of WQ22



Photo 33- Uncontained gasoline and fertilizer containers in the vicinity of WQ22



Photo 34 – Uncontained gas tanks in the vicinity of WQ22



Photo 35 – Uncontained gas tank in the vicinity of WQ34



Photo 36 - Improperly stored gasoline near WQ38



Photo 37 - Uncontained fertilizers at WQ3



Photo 38 - Uncontained fertilizers in the vicinity of WQ22



Photo 39 – uncontained soil and trash at WQ4



Photo 40 – uncontained soil in the vicinity of WQ34



Photo 41 – plastic trash in what appears to be an abandoned drying location on top of a watercourse at WQ15



Photo 42 – a watercourse channel just below the trash at WQ15



Photo 43 – Slope failure at WQ17



Photo 44 – Trash and plant waste at WQ18



Photo 45 - Improperly disposed trash at WQ1



Photo 46 - Metal and plastic pile at WQ26



Photo 47 - Improperly disposed trash at WQ33



Photo 48 - Wood and plastic pile at WQ37



Photo 49 - Pit toilet at WQ38



Photo 50 - Pit toilet at WQ20



Photo 51 - Outdoor shower and laundry at WQ23