

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SAN DIEGO REGION

FACILITY INSPECTION DATA ENTRY FORM

DATE: 02/20/07 TIME: 10 AM WDID: 9 37C322900 ORDER NO. 99-08-DWQ FILE NO. 10-3022900.02 ³

FACILITY REPRESENTATIVE(S) PRESENT DURING INSPECTION: Steven Hoyle, NCTD, Keith Kranda, Wilson & Company; Bill O'Sullivan, West Coast Rail Constructors; and Ken McGrath, NCTD.

North County Transit District (NCTD)
NAME OF OWNER, AGENCY OR PARTY RESPONSIBLE FOR DISCHARGE

Don Bullock, (760) 737-8625
OWNER CONTACT NAME AND PHONE #

Sprinter Rail Proj
FACILITY OR DEVELOPER NAME (if different from owner)

Steven Hoyle, (760) 737-8625 x254
FACILITY OR DEVELOPER CONTACT NAME AND PHONE #

808 Rancheros Drive
FACILITY STREET ADDRESS

San Marcos, CA
FACILITY CITY AND STATE

APPLICABLE WATER QUALITY LICENSING REQUIREMENTS (CHECK ALL THAT APPLY)

- MS4 URBAN RUNOFF REQUIREMENTS NPDES NOS. CAS0108758, CAS0108740 or CAS0108766
- GENERAL PERMIT ORDER NO. 99-08-DWQ, NPDES NO. CAS000002 - CONSTRUCTION
- GENERAL PERMIT ORDER NO. 99-06-DWQ, NPDES NO. CAS000003 - CALTRANS
- GENERAL PERMIT ORDER NO. 97-03-DWQ, NPDES NO. CAS000001 - INDUSTRIAL
- GENERAL OR INDIVIDUAL WASTE DISCHARGE REQUIREMENTS OR NPDES
- GENERAL OR INDIVIDUAL WAIVER OF WASTE DISCHARGE REQUIREMENTS
- SECTION 401 WATER QUALITY CERTIFICATION
- CWC SECTION 13264,

INSPECTION TYPE (Check One)

- A1 "A" type compliance--Comprehensive inspection in which samples are taken. (EPA Type S)
- B1 "B" type compliance--A routine nonsampling inspection. (EPA Type C)
- 02 Noncompliance follow-up--Inspection made to verify correction of a previously identified violation.
- 03 Enforcement follow-up--Inspection made to verify that conditions of an enforcement action are being met.
- 04 Complaint--Inspection made in response to a complaint.
- 05 Pre-requirement--Inspection made to gather info. relative to preparing, modifying, or rescinding requirements.
- 06 Miscellaneous - inspection type is not included on this list, may include NOT, NEC, NONA or other types
- 07 Pretreatment Audit (every five years)
- 08 Pretreatment Compliance (yearly except audit year)

INSPECTION FINDINGS

- Y Were violations noted during this inspection? (Yes/No/Pending Sample Results)
- N Were samples taken? (N=no) If YES then, G= grab or C= Composite and attach a copy of the sample results/chain of custody form

I. COMPLIANCE HISTORY:

None

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II. FINDINGS

On Tuesday, February 20, 2007, Mr. Ben Neill, Water Resource Control Engineer (reporting), and Mr. Pete Peuron, Environmental Scientist, both of the Central Watershed Unit conducted an unannounced construction inspection of the North County Transit District's Sprinter Rail construction project. The Sprinter Rail will be a 22 mile commuter light rail line between Oceanside and Escondido mostly along the Highway 78 corridor. According to NCTD's website (<http://www.gonctd.com/oerail/oerailc.html>), the project is scheduled for completion in December of 2007. The estimated budget is \$440 million.

On the previous day, the Vista area received 0.37 inches of rain according to the National Weather Service's website, http://www.wrh.noaa.gov/sqx/obs/rtp/rtp_VIS_07. On the day of the inspection, the weather was partly cloudy. The ground was still extremely muddy from the previous day's rain. Puddles and pools of rain water were throughout the site. The construction inspection did not observe the complete 22 mile corridor. Instead the inspection covered select areas where major street and stream crossings occurred including Escondido Avenue in Vista, Mar Vista Dr. in Vista, Buena Creek in County of San Diego, Armorlite Drive construction yard in San Marcos, and along Barham Drive in San Marcos. The site lies entirely within the Carlsbad Watershed. Many downstream receiving waters in this watershed are on the 303d list of impaired waterbodies for construction source pollutants including: Agua Hedionda Creek for Total Dissolved Solids (TDS), Agua Hedionda Lagoon for sedimentation, Buena Vista lagoon for sedimentation, Escondido Creek for TDS, and San Elijo Lagoon for sedimentation.

At approximately 10:30 am, We drove past the intersection of the Sprinter Rail construction and Escondido Avenue in Vista, CA. I immediately noticed excessive sediment tracking from the construction site onto Escondido Avenue, photo 001. A street sweeper was slowly sweeping Escondido Avenue. We parked at a local strip mall and proceeded to the construction trailers at the site. We talked with the electrical contractor who instructed us to check in at the general contractor's trailer in San Marcos. As we walked back to vehicle, we saw inadequate construction material and trash storage, Photos 002,003, and 004. A gas can was stored outside without cover or containment to prevent storm water pollution. Trash bins have lids but the lids were not being used. The trash inside was soaked and water was pooled in the bottom of the trash bin. Although the trash bins were mostly empty, a large pile of construction trash was next to a storage container.

I saw a group of NCTD officials standing on site and approached them to discuss site conditions. I introduced myself to Steve Hoyle, NCTD project officer, Keith Kranda, Wilson & Company railroad construction manager, and Ken McGrath, NCTD engineer. They were informed of our inspection by the City of Vista officials whom we met earlier in the day. I informed them of the aforementioned violations and asked to inspect the site. Mr. Hoyle waived the site requirement that Pete and I have the 4 hour railroad safety training prior to entering the site, provided that we were accompanied by NCTD officials during the inspection. We walked east of Escondido Avenue along the rail line. A storm drain inlet was without adequate inlet protection, photo 005. The silt fence around it was completely overwhelmed and failing resulting in a discharge of sediment to the inlet. As we walked further east, we did not see any erosion controls on a large slope, photo 006. Throughout the site in all areas we inspected, erosion controls were absent. A large disturbed area was without any sediment or erosion controls and erosion rills and gullies were present, photo 007. A large storm drain system was being built north of the rail line and NCTD officials stated that this system was blocked off and therefore inactive.

We then proceeded to the west side of Escondido Avenue. The construction exit has too little gravel to prevent sediment tracking onto Escondido Avenue, photo 010. Farther west, were two large concrete wash water spills on the ground, photos 011 and 012. A plastic lined concrete washout pit is available on the east side of Escondido Avenue but was not used in these instances. The construction area was littered with construction related trash throughout the site, photo 013. Trash containers were not readily available. The only trash containers seen were those in photo 003 near the trailers. Slopes along the sides of the railroad tracks did not have any erosion control BMPs such as mulch, hydroseed, or blankets, photos 014, 015, and 018. A storm drain outfall did not have any rock energy dissipater to prevent erosion, photo 016. Steve Hoyle and Keith Kranda departed the inspection at this time. For the remainder of the inspection, we were accompanied by Bill O'Sullivan, West Coast Rail Constructors; and Ken McGrath, NCTD.

Following the inspection of construction at Escondido Avenue, we drove to the construction storage yard at Mar Vista Drive in Vista. We parked the car just to the south of the railroad tracks and walked across them to the storage yard. The entrance/exit does not have any BMPs (Large gravel rock, shaker plates) to prevent sediment tracking onto Mar Vista Drive, photo 019. Significant tracking was observed onto the paved street. A storage stockpile of asphalt was uncovered, photo 021. A black plastic tarp was folded back and was intended to cover the stockpile. Puddles of water were pooled on top of the folded back, black, plastic tarp. At the northeast corner of the storage yard is a large storm drain collecting runoff from the entire yard. The inlet had inadequate gravel bag BMPs. Sediment had collected around the inlet and overtopped the gravel bags entering the storm drain, photo

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022. The construction yard had very little sediment controls throughout the yard to prevent the sediment transport. A large pile of construction trash was stored in the yard with no BMPs to cover or contain the trash, photos 023 and 024. The slope from the railroad tracks to the construction yard did not have any erosion control BMPs, photo 025. A silt fence below the slope was not maintained and failing under the sediment load.

The next stop on the railroad inspection was the bridge crossing Buena Creek. In addition to the bridge construction, a construction storage yard is next to the creek. The bridge construction lacked erosion controls on either side of the bridge abutments, photo 026. The bare dirt had erosion gullies leading to the creek. The site is currently dewatering for the bridge construction, photo 027. The construction yard had a large pile of construction trash with inadequate cover or containment, photo 028. The construction yard's exit was inadequate to prevent sediment tracking onto the adjacent Buena Creek Road, photo 029.

We continued east and briefly stopped at the main construction yard and offices, located south of Palomar College in San Marcos, between Mission Road and Armorlite Drive. The construction yard was fairly trash free except for a storm drain inlet, photo 030. The inlet did not have any BMPs. Rather, the inlet was blocked off by a wooden pallet with large gaps between the slats. Sediment had collected on top of the slats, and entered the storm drain between the slats.

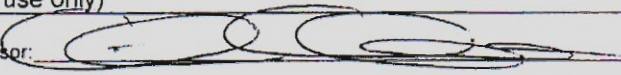
The next stop was at Barham Lane in San Marcos, between San Marcos State to the west and Shelley drive to the east. South of Barham Lane was a large bare dirt pad with no erosion or sediment controls. An inlet collecting runoff from this area was overwhelmed with sediment flows, flattening silt fences and overtopping the single row of gravel bags to enter the storm drain, photo 031. The railroad tracks are on the north side of Barham Lane. The slope from the tracks to Barham lane did not have any erosion controls, photo 032. The existing fiber rolls were deteriorated, and unmaintained. A concrete storm drain ditch at the base of the slope had sediment in it. The ditch discharges to a storm drain inlet that was completely unprotected, photo 033. Farther east along Barham lane, another storm drain inlet was not protected adequately, photo 034. The silt fence was flattened from sediment load and gravel bags were over topped. At the east end of Barham Lane near Shelley Drive, several storm drains were without any inlet protection, photos 035, 037, and 038. Sediment and sediment-laden water had entered the storm drain system at all three inlets. The areas upstream of these inlets had no erosion sediment controls to help slow down erosive flows and trap sediment, photos 036 and 039. An active construction area at the corner of La Moree Road and Barham Lane had no erosion controls, sediment controls or sediment tracking control BMPs.

Throughout the inspection, these violations were pointed out to the NCTD officials and their contractors. Before departing the railroad construction near Barham Lane, I informed Bill O'Sullivan and Ken McGrath about the likelihood of a Notice of Violation resulting from the inspection and the possibility of higher enforcement actions. I advised them that their best course of action is to immediately correct all violations, document the corrections and take further measures to prevent repeat violations.

III. SIGNATURE SECTION

		<u>2/20/07</u>
STAFF INSPECTOR	SIGNATURE	INSPECTION DATE

IV. (For internal use only)

Reviewed by Supervisor: 	Date <u>3/1/07</u>
cc: City _____	Contact _____
Program: NPDES STORM NON15-WDR 401 NPS TITLE 27 AGT DoD LNDISP PTRPG RCRA SLIC REC	
Inter-office Referral: 1) _____ 2) _____ 3) _____ 4) _____ 5) _____	

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CIWQS: Inspection - 995978
Violations - 493226, 493227, 493228, 493229, 493230, 493231



All photos taken by Ben Neill, Water Resource Control Engineer, Central Watershed Unit. All photos file names are "NCTD Rivera & San Dieguito Park ###.jpg" For simplicity, this report only refers to the ### of the photo.

001. Excessive sediment tracking onto Escondido Avenue.

Photos 001 through 018 were taken around Escondido Avenue in Vista.



002. Inadequate material storage of a gasoline can.



003. Although the trash cans do have lids they have not been used. Pooled water and soaked trash was observed inside the trash cans.

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004. Although the trash containers were mostly empty in photo 003, trash is stored outside without cover or containment.



005. Storm drain inlet is without adequate protections. Silt fence is completely overwhelmed and failing resulting in a discharge of sediment into the storm drain inlet.



006. A large slope without erosion control measures.

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007. Erosion gully in a disturbed area without sediment or erosion controls.



010. Inadequate gravel to prevent sediment tracking onto the adjacent Escondido Avenue.



011. A concrete slurry spill on the ground. A washout was available across the street.

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012. Another concrete slurry spill not far from the one in photo 011.



013. Excessive trash on the construction site.



014. Erosion gully down a slope with no erosion controls.

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015. Another erosion gully in an area without erosion controls.



016. Storm drain discharge point with no energy dissipation.



018. A long slope with no erosion or sediment controls.



019. Sediment tracking onto the adjacent paved surface due to a total lack of BMPs.

Photos 019 through 025 are at the storage yard at Mar Vista Dr. in Vista.



021. Although this asphalt stockpile does have plastic to cover it in case of rain, site personnel did not cover the stockpile. Puddles of water are seen on top of the folded up plastic.



022. Sediment discharge at a storm drain inlet that is completely overwhelmed from sediment flows. This inlet received runoff from the material storage yard that has soil stabilization and sediment controls.

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023. Construction trash storage is inadequate with no containment or coverage.



024. Construction trash storage is inadequate with no containment or coverage.



025. A slope is without adequate erosion or sediment controls is eroding away. Silt fencing is inadequate, not maintained and overwhelmed.

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026. Bare dirt next to the bridge abutments is eroding away and discharging into Buena Creek. The arrow points to the edge of the creek.

Photos 026 through 029 are at Buena Creek in the County of San Diego.



027. Groundwater dewatering for bridge work.



028. Inadequate trash containment without cover or containment.

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029. Inadequate gravel to prevent sediment tracking onto the adjacent street.



Photo 030 is at NCTD's main construction yard and office on Armorlite drive in San Marcos.

030. Sediment discharge at a storm drain inlet without adequate inlet protection provided by a wooden slats with large gaps. The wooden slats appear to have held back the trash.



Photos 031 through 040 were taken along Barham Drive in San Marcos.

031. Sediment discharge at a storm drain inlet with inadequate inlet protections. A lack of source controls resulted in sediment flows that overwhelmed the silt fencing.

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032. A large slope is without any erosion control protections. Dirt is stockpiled in the storm drain ditch.



033. Sediment discharge into a storm drain inlet without any inlet protections. Fiber rolls are deteriorated and not placed properly. Slope is without erosion controls.



034. Sediment discharge at a storm drain inlet without adequate protections. Silt fence has been overwhelmed due to a lack of upstream source control measures.

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035. Sediment discharge at a storm drain inlet without any inlet protections.



036. Upstream of photo 035 there is a lack of sediment or erosion control BMPs.



037. Sediment and sediment laden water discharge at an unprotected storm drain inlet.



038. Sediment and sediment laden water discharge into a storm drain inlet without any inlet protection. This inlet is across the rail road tracks from the inlet in photo 037.



039. Storm drain channel without any perimeter sediment controls.



040. Sediment tracking onto the pavement. Slope behind the front loader is without erosion or sediment controls. No sediment controls behind the curb.

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