From: Ghoram, Whitney@Waterboards

To: corycasey@gmail.com

Cc: Walsh, Laurie@Waterboards; slindsey@sandiego.gov; Ghoram, Whitney@Waterboards

Subject: Casey Development - Parkview Estates Construction: Post Inspection Required Corrective Actions

Date: Wednesday, February 10, 2016 5:05:23 PM

Attachments: <u>InspectionPics-CaseyDevelopment-ParkviewConstruction.pdf</u>

Importance: High

Mr. Casey, (RE: WDID 9 37C371859)

I conducted an inspection of the Casey Development Parkview Estates construction site on February 9, 2016. You accompanied me during my inspection of the site. Parkview Estates is a Risk Level 2 site under the Statewide Construction General Permit Order R9-2009-0009-DWQ (CGP). Based on my observations, several requirements for a Risk Level 2 construction site were not implemented or inadequately implemented in compliance with the CGP (See attached photos). Please refer to Attachment D of the Statewide Construction General Permit Order R9-2009-0009-DWQ, D. Erosion Control, and E. Sediment Controls for Risk Level 2 sites.

I informed you of the deficiencies and violations that I observed at the construction site during my inspection. This email is to document all of my observations, as well as provide you an opportunity to provide information that will demonstrate the site has been brought into compliance with the requirements of the CGP. Attached are photos taken during the inspection showing the areas that need to be addressed (as marked with red arrows, circles, or notes) to demonstrate compliance with the CGP requirements for a Risk Level 2 site.

- 1. All Risk Level 2 site are required to implement effective soil cover for inactive areas. All Risk Level 2 sites are required to implement appropriate erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for active areas. Areas that are inactive should already have effective soil cover or soil stabilization implemented. Runoff controls and soil stabilization are expected to be implemented prior to a predicted rain event for all active areas. The site lacks appropriate erosion control BMPs to prevent erosion for inactive as well as some of the active areas. The sediment controls and perimeter controls are deficient as well.
- 2. All Risk Level 2 sites are required to contain and securely protect stockpiles of waste and construction material from wind and rain at all times unless actively being used. Attached photos show stockpiles that are not adequately covered and do not have protection from rain.
- 3. All Risk Level 2 sites are required to implement good housekeeping, including sweeping and trash management.

Some of the specific deficiencies noted are: sediment on paved streets and in curb core drain pipe outlets at the curb. Worn, torn and broken fiber rolls. Trash on the ground.

Unsecured/un-staked fiber rolls. Inadequate concrete washout. Unsecured/improperly installed silt fence. Lack of erosion controls (stabilization) on inactive portions of the site.

Open driveway apron entrance without a shaker plate and rock. Uncovered stockpiles. In addition, the SWPPP did not contain employee training logs as required by the CGP. Please provide employee training logs for all contractors, subcontractors and personnel working at the site by February 19, 2016.

The City of San Diego has issued BMP Notice's to Casey Development for the Parkview Estates construction project on numerous occasions in the past for deficient BMP implementation. This coupled with my observations demonstrates chronic non compliance with the CGP.

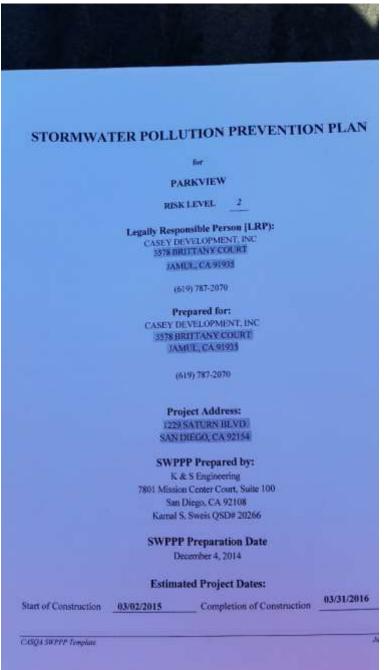
The deficiencies noted in the attached photos are violations of the CGP are subject to enforcement action and potential civil liabilities of up to \$10,000 per day per violation.

Please email me photos of all required corrective actions by COB February 17, 2016, and prior to the next storm event.

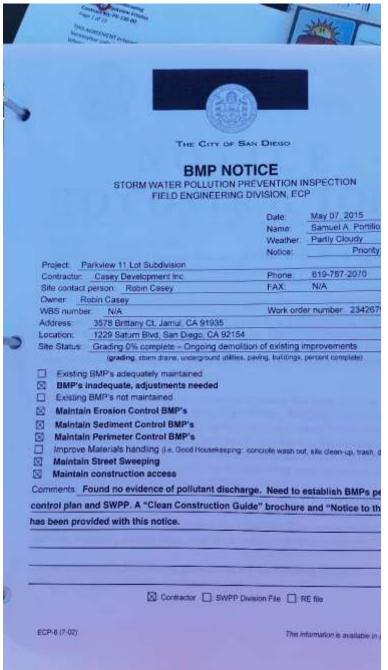
Let me know if you have any questions. Thank you for your time and cooperation.

Ms. Whitney J. Ghoram Sanitary Engineering Associate Storm Water Unit San Diego Regional Water Quality Control Board-Region 9 2375 Northside Drive, Suite 100 San Diego, CA 92108 Phone (619) 521-8040

E-Mail: <u>WGhoram@waterboards.ca.gov</u> Website: <u>www.waterboards.ca.gov/sandiego</u> WDID: 9 37C371859



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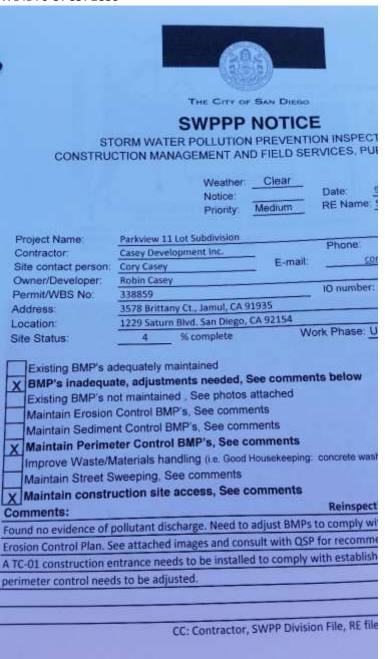
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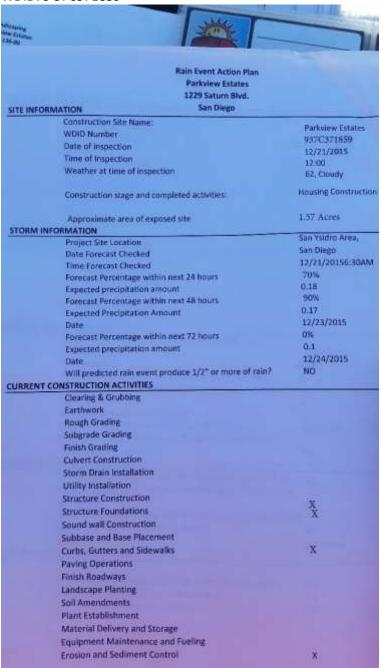
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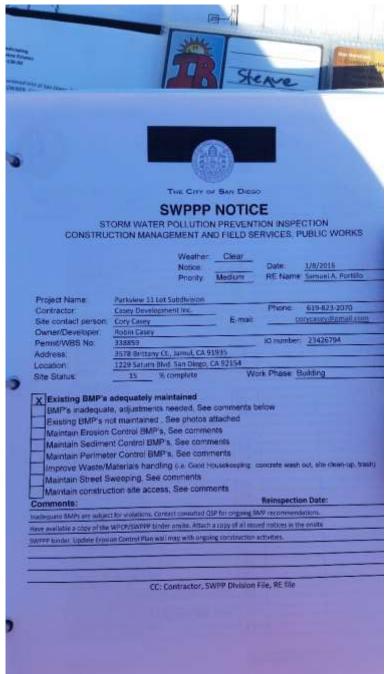
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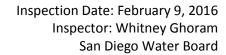
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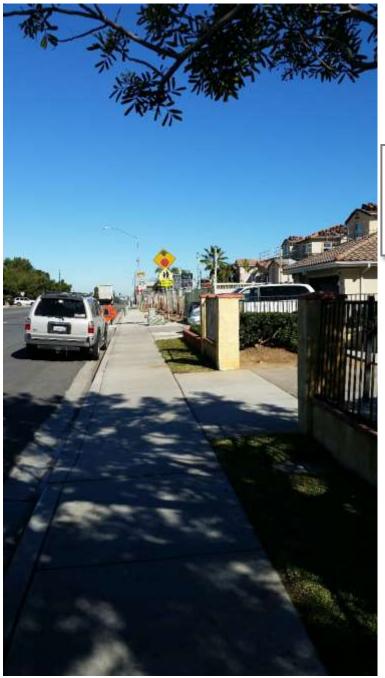
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Looking north toward site boundary along Saturn Blvd.

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Inspection Date: February 9, 2016 Inspector: Whitney Ghoram San Diego Water Board

Location of a fiber roll along Saturn Blvd. Purpose unknown.

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Inspection Date: February 9, 2016 Inspector: Whitney Ghoram San Diego Water Board

This new fiber roll is placed against the curb approximately 100 feet away from the site, to the south on Saturn Blvd. Please explain the purpose.

Casey Development-Parkview Estates Construction 1229 Saturn Blvd., San Diego 92154 WDID: 9 37C371859



WDID: 9 37C371859



Inspection Date: February 9, 2016 Inspector: Whitney Ghoram San Diego Water Board

Deficient perimeter control BMPs. Fiber rolls require replacement and proper staking at 4 foot intervals. Also, exposed soil/sediment requires stabilization.



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Inspection Date: February 9, 2016 Inspector: Whitney Ghoram San Diego Water Board

Exposed soil/sediment requires stabilization. Fiber rolls require replacement.

Casey Development-Parkview Estates Construction

Inspection Date: February 9, 2016 Inspector: Whitney Ghoram 1229 Saturn Blvd., San Diego 92154 WDID: 9 37C371859 San Diego Water Board



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Inspection Date: February 9, 2016

Inspector: Whitney Ghoram

WDID: 9 37C371859



Casey Development-Parkview Estates Construction

Inspection Date: February 9, 2016 1229 Saturn Blvd., San Diego 92154 Inspector: Whitney Ghoram San Diego Water Board





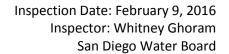
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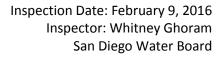
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Worn fiber rolls require replacement. Incorrect staking of fiber rolls. Exposed soil/sediment.

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Unstaked, unsecured fiber roll. Improperly installed and failing silt fence. Trash on the ground.

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Inspection Date: February 9, 2016 Inspector: Whitney Ghoram San Diego Water Board

Worn and improperly installed fiber rolls. Exposed soil/sediment that should be stabilized per Risk Level 2 requirements.

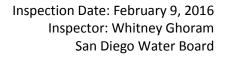
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Exposed soil/sediment.

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Curb core drains containing sediment.

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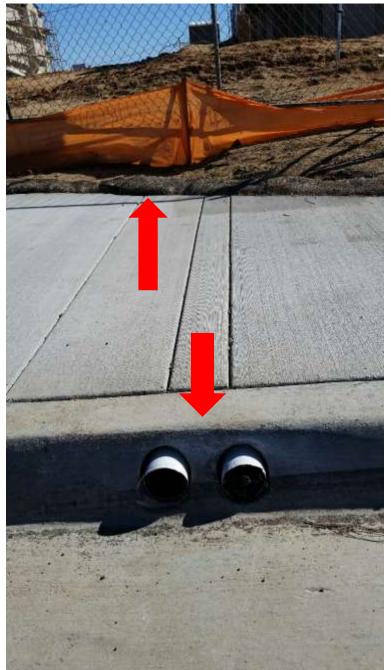
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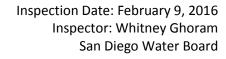


Sediment discharges onto asphalt. Poor housekeeping. Improperly installed perimeter controls.

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Improperly installed silt fence perimeter control.

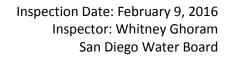
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Improperly installed perimeter controls.

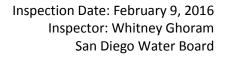
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Improperly installed silt fence and fiber rolls.

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Sediment discharge onto asphalt and improperly installed perimeter control (fiber rolls).

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