From:	Ghoram, Whitney@Waterboards
То:	chadh@ecconstructors.com
Cc:	Walsh, Laurie@Waterboards; Ghoram, Whitney@Waterboards
Subject:	Grossmont High School Increment 1 Construction: Post Inspection Required Corrective Actions
Date:	Wednesday, February 24, 2016 12:07:09 PM
Attachments:	InspectionPics-GrossmontHS-Increment-1Construction.pdf
Importance:	High

Mr. Hester, (RE: WDID 9 37C369958)

I conducted an inspection of the Grossmont High School Increment 1 construction site on February 23, 2016. You were not present at the time of my inspection of the site (construction personnel gave me your business card). Therefore, I was not able to access the interior of the construction site to evaluate erosion control BMPs and sediment control BMPs. However, I was able to make observations of perimeter control BMPs which were found to be either absent or deficient. This is a Risk Level 2 site under the Statewide Construction General Permit Order R9-2009-0009-DWQ (CGP). Based on my observations, requirements for a Risk Level 2 construction site are 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, for all Risk Level 2 requirements, and, specifically, "E. Sediment Controls, 6. Additional Risk Level 2 Requirement: Risk Level 2 dischargers shall ensure that all storm drain inlets and perimeter controls, runoff control BMPs, and pollutant controls at entrances and exits are maintained and protected from activities that reduce their effectiveness".

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.
- 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.
- 3. All Risk Level 2 sites are required to implement good housekeeping, including sweeping and trash management.

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 29, 2016, and prior to the next storm event. Also, email a copy of the SWPPP (Storm Water Pollution Prevention Plan), which I was not able to review during my inspection.

After corrective actions have been made, I will schedule a date & time with you to conduct a full site inspection. 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: WGhoram@waterboards.ca.gov Website: www.waterboards.ca.gov/sandiego





Inspection Date: February 23, 2016 Inspector: Whitney Ghoram San Diego Water Board



Lack of perimeter controls

Inspection Date: February 23, 2016 Inspector: Whitney Ghoram San Diego Water Board



Lack of perimeter control BMPs, Poor Housekeeping





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Deficient and lack of perimeter control BMPs.

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Grossly deficient perimeter control BMPs

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Poor housekeeping. Deficient BMPs

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Lack of perimeter controls

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Broken gravel bag





Inspection Date: February 23, 2016 Inspector: Whitney Ghoram San Diego Water Board



Deficient perimeter controls: Worn fiber rolls that are not staked into the ground at 4 foot intervals.



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Deficient perimeter controls: Worn fiber rolls that are not staked into the ground at 4 foot intervals.







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Deficient perimeter controls at discharge point to MS4 (storm drain inlets). Also, evidence of sediment discharge.