Stewart, Rebecca@Waterboards

From: Chiu, Wayne@Waterboards

Sent: Monday, November 17, 2014 1:25 PM

To: Gustavo Maldonado

Cc: Larry Holley

Subject: WDID 937C369598 (Hilton Garden Inn): 14 November 2014 Inspection

Attachments: 2014-1114 Inspection Photos Hilton Garden Inn.pdf

Hi Gustavo.

I apologize, but the photos I sent had headers with incorrect site and date information. Attached is a correct version of the photos attachment.

Please let me know if you have any questions.

Thanks, Wayne

From: Chiu, Wayne@Waterboards

Sent: Monday, November 17, 2014 12:57 PM

To: Gustavo Maldonado

Cc: Larry Holley; Arias, Christina@Waterboards; Becker, Eric@Waterboards **Subject:** WDID 937C369598 (Hilton Garden Inn): 14 November 2014 Inspection

Hi Gustavo,

I want to thank you, Tim and Bob for taking the time to walk with me around the Hilton Garden Inn construction site last Friday. Hopefully you have a better understanding of the BMPs we expect to see to be in compliance with the requirements of the Construction General Permit, Order No. 2009-0009-DWQ (CGP) and will be able to convey this information to the Qualified SWPPP Developer (QSD) and Qualified SWPPP Practitioner (QSP) to correct the situation.

Attached are some photos taken during the inspection that show examples of areas that need to be addressed to demonstrate compliance with the CGP requirements for a Risk Level 1 site. Please send me the following information and documentation by **November 20, 2014**:

- 1. The SWPPP does not include any erosion control BMPs other than scheduling and preservation of existing vegetation. All the vegetation from the site has been removed and the project has been scheduled to allow exposed disturbed soil for extended periods of time. Additional erosion control BMPs are required to be included in the SWPPP to indicate when and how disturbed soil areas will be protected from erosion when they become inactive or when a rain event is expected. Please provide me a schedule for when the SWPPP will be updated by the QSD and uploaded to the Storm Water Multiple Application and Report Tracking System (SMARTS).
- 2. All persons responsible for implementing the SWPPP, which includes contractors and subcontractors, are required to be trained and documentation of that training is required to be maintained with the SWPPP. Please provide me copies of the training records to document all personnel working on the site have received training on their responsibilities for implementing the requirements of the SWPPP.
- 3. Good housekeeping BMPs are necessary for controlling pollutant sources and preventing pollutants from being exposed and potentially transported and discharged from the site during storm events. Photos 1 through 4 show examples of areas of the site where trash needs to be properly disposed and contained, trash containers need to have

covers available, sanitation facilities need to be properly maintained and inspected to prevent spills and leaks, and a waste oil container needs to be properly contained/protected and/or disposed. Please provide photos that demonstrate good housekeeping BMPs have been implemented to address the deficiencies identified.

- 4. Non-storm water needs to be properly managed to prevent any non-storm water discharges and the transport of sediment and other pollutants of the site. Photos 5 and 6 show examples of locations we observed during the inspection where non-storm water discharges can be better managed to prevent non-storm water discharges from the site. Please provide photos or other documentation that demonstrate proper non-storm water management is being implemented to address the deficiencies identified.
- 5. Erosion control BMPs that provide effective soil cover are required to be implemented to prevent the mobilization of sediment before it can be transported to other parts of the site and potentially off site. Erosion control BMPs must protect inactive disturbed soil areas from wind and surface runoff erosion. Photos 7 and 8 show areas of the site that should have had erosion control BMPs applied. Photo 6 also shows evidence of the lack of erosion controls already resulting in erosion and sediment transport. Please provide photos or other documentation that demonstrate erosion control BMPs are being implemented or available to be implemented to address the deficiencies identified.
- 6. Sediment control BMPs are required to be implemented to reduce the potential for sediment to be transported within and potentially off site. Photos 7, and 9 through 12 show areas of the site where perimeter sediment controls have not been adequately implemented, installed, and/or maintained. Please provide photos or other documentation that demonstrate sediment control BMPs are being adequately implemented to address the deficiencies identified.

When a QSP identifies and documents deficiencies in BMP implementation or maintenance in the weekly inspection reports, repairs or design changes are required to be initiated within 72 hours of identification and completed as soon as possible. Please provide me the next two QSP weekly inspection reports by **December 1, 2014** which should document that all the deficiencies identified during my inspection have been addressed.

Please let me know if you have any questions.

Thanks,

Wayne Chiu, PE

Water Resource Control Engineer Storm Water Management Unit California Regional Water Quality Control Board San Diego Region 2375 Northside Drive, Suite 100 San Diego, CA 92108 Direct Line: (619) 521-3354

Main Line: (619) 516-1990

Hilton Garden Inn WDID 9 37C369598



Photo 1



Photo 3



Photo 2



Photo 4

Construction Storm Water Inspection Photos November 14, 2014



Photo 5



Photo 7



Photo 6



Photo 8



Photo 9



Photo 11



Photo 10



Photo 12