

# Appendix D: Construction

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## Table of Contents

Implementation of Construction General Permit .....	3
Construction Enforcement Actions Response .....	3
Construction Self-Audit Compliance Monitoring.....	15
Combined Review Results .....	15
Administrative Findings .....	16
Field BMP Findings .....	17
BMP Findings of Field BMP Types and Trends .....	19

## Tables<sup>1</sup>

Table D-1: Construction Program – SWPPP Implementation July 1, 2017 to June 30, 2018.....	3
Table D-2: Summary of Response to Enforcement Actions July 1, 2017 to June 30, 2018 .....	5
Table D-3: Summary of Findings July 1, 2017 to June 30, 2018 .....	16
Table D-4: Summary of Administrative Findings .....	17
Table D-5: Summary of Field BMP Findings.....	18
Table D-6: Findings of Field BMP Types July 1, 2017 to June 30, 2018.....	20

## Figures

Figure D-1: Combined Findings (All Projects), July 1, 2017 to June 30, 2018.....	15
Figure D-2: Administrative Findings (All Projects), July 1, 2017 to June 30, 2018 .....	17
Figure D-3: Field BMP Findings, July 1, 2017 to June 30, 2018 .....	19
Figure D-4: Findings of Field BMP Types July 1, 2017 to June 30, 2018 .....	21

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<sup>1</sup> Dashes (-) in this appendix's tables indicate that data is not available or not applicable.

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## Implementation of Construction General Permit

Table D-1 shows the total number of active construction sites and, of those, the total number requiring a SWPPP, and the total number with a SWPPP. It also shows the number of active construction sites requiring a Water Pollution Control Program (WPCP), and the number with a WPCP.

*Table D-1: Construction Program – SWPPP Implementation  
July 1, 2017 to June 30, 2018*

District	Total # of Active Construction Sites	Total # of Active Construction Sites Requiring a SWPPP	Total # of Active Construction Sites with a SWPPP	Total # of Active Construction Sites Requiring a WPCP	Total # of Active Construction Sites with a WPCP
1	19	19	19	-	-
2	24	24	24	-	-
3	12	12	12	-	-
4	53	51	51	2	2
5	18	18	18	-	-
6	24	23	23	1	1
7	64	63	63	1	1
8	40	40	40	-	-
9	3	3	3	-	-
10	18	17	17	1	1
11	37	37	37	-	-
12	22	22	22	-	-
<b>Total</b>	<b>334</b>	<b>329</b>	<b>329</b>	<b>5</b>	<b>5</b>

## Construction Enforcement Actions Response

Table D-2 summarizes how enforcement actions related to construction activities were addressed during the 2017-2018 fiscal year. This aspect of the Construction Program is discussed in Section 6 of the Annual Report.

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**Table D-2: Summary of Response to Enforcement Actions  
July 1, 2017 to June 30, 2018**

District	Enforcement Action Type	Project Name and/or Identification Number	Incident Date	Incident Summary	Caltrans Response Required	Incident Resolution Date	Status
1	NOV/13267	Willits Bypass	9/27/2017	<p>Caltrans violated conditions 7, 20, and 21 of the CWA Section 401 per RB site inspections conducted on 5/5/17 and 6/29/17. The project modified a wetland establishment area in the form of a water retention pond (appx. 3-foot tall by 8-foot wide berm), which was not shown on the RB approved construction plan sheet. Caltrans did not submit this design modification for approval. The Mitigation and Monitoring Proposal (MMP) plans were changed without RB approval. The modification likely resulted in a change to wetland type.</p>	<p>Caltrans is required to submit technical reports containing the following information within 45 days of the date of this NOV:</p> <p>Proposed remedies for the alleged violations, and a detailed explanation why construction plans were not followed and why the modifications (berms) were constructed for all mitigation areas.</p> <p>Tabulated information for all mitigation areas: existing wetland area prior to any work, USACOE Jurisdictional maps, proposed amount of wetland fill, original RB-approved plan sheets, proposed finished wetland areas (from approved MMP) and current wetland area, current amount of wetland fill, current as-built plan sheets, reasoning for altering wetland types to what was originally present (from current as-built).</p>	-	N/A

**Table D-2: Summary of Response to Enforcement Actions  
July 1, 2017 to June 30, 2018**

District	Enforcement Action Type	Project Name and/or Identification Number	Incident Date	Incident Summary	Caltrans Response Required	Incident Resolution Date	Status
1	ACL	Willits Bypass	3/20/2018	Caltrans is alleged to have violated provisions of the 401 Cert and CGP. Violation #1 is for unauthorized discharge of storm water runoff from the project during 3 storm events in 2014. Caltrans estimated appx. 3,443,280 gallons entered Haehl creek. Violation #2 alleges that sediment basins were not designed in accordance with CASQA BMP Fact Sheet, and a non-standard BMP proposal was not submitted (37 day duration). Violation #3 alleges that Caltrans inadequately employed erosion control BMPs prior to the 3 storm events referenced in Violation #1.	The liability amount was calculated to be \$2,383,075 by Prosecution Staff per Attachment A of the ACL. Caltrans and the prosecution have agreed to the imposition of \$1,954,999 in liability which must be paid within 30 days of the days of the effective date of this order. \$45,000 is credited to Caltrans to complete the Supplemental Environmental Project (SEP). The SEP is included in Attachment B of the ACL and must be completed within 12 months of this order (03/20/2019). Monthly progress reports on the SEP must be submitted on the 15th day of the following month.	N/A	-
1	EPL	Route 105 Dewatering Project	8/22/2017	Caltrans received an EPL No. R4-2017-0157 for effluent exceedances, in violation of order R4-2013-0043.	Caltrans to respond to EPL.	-	N/A
1	EPL	Route I-10 Pavement Rehab. Project	8/22/2017	Caltrans received an EPL No. R4-2017-0158.	-	-	N/A

**Table D-2: Summary of Response to Enforcement Actions  
July 1, 2017 to June 30, 2018**

District	Enforcement Action Type	Project Name and/or Identification Number	Incident Date	Incident Summary	Caltrans Response Required	Incident Resolution Date	Status
1	ACL	Route 105 Dewatering Project	11/3/2017	Caltrans received ACL No. R4-2017-0157 to pay the \$36,000 penalty for effluent exceedances for Trichloroethene, 1,1-Dichloroethylene, and Vinyl Chloride in violation of Order No. R4-2013-0043.	Caltrans to pay 36,000	-	Pending
1	-	Route I-10 Pavement Rehab. Project	2/2/2018	Stipulated order on settlement offer no. R4-2017-0158 for effluent exceedances for Nitrogen in violation of order No. R4-2013-0095 for a total liability of \$81,000.	Caltrans to pay settlement amount of \$81,000 by March 5, 2018.	Pending	In Progress
2	NNC	Honey Lake Wetlands Mitigation Site	7/27/2017	1st NNC for failure to submit 2015-2016 Annual Report by the due date 9/2/2016.	Caltrans to submit 2015-2016 Annual Report.	-	N/A
3	NNC	ED 50 Wildwood	7/27/2017	1st NNC for failure to submit 2015-2016 Annual Report by the due date 9/2/2016	Caltrans to submit the 2015-2016 Annual Report	-	In Progress
3	NNC	Martis Creek Left Turn Pocket	7/27/2017	Caltrans failed to submit 2015-2016 Annual Report by the due date 9/2/2016.	Caltrans to submit 2015-2016 Annual Report	-	In Progress

**Table D-2: Summary of Response to Enforcement Actions  
July 1, 2017 to June 30, 2018**

District	Enforcement Action Type	Project Name and/or Identification Number	Incident Date	Incident Summary	Caltrans Response Required	Incident Resolution Date	Status
3	NOV	Bridge 25-0021 Replacement	12/13/2017	Caltrans received an NOV in response to an inspection conducted on 11/16/2017 for failure to install erosion and sediment control BMPs on the west abutment slopes of the bridge, on the area behind the retaining wall west of the bridge, and throughout active areas of the project.	Caltrans to install effective erosion and sediment control BMPs immediately and active areas prior to a storm event and revise the SWPPP as necessary to include any additional BMPs.  By January 13, 2018 Caltrans must submit a narrative description of BMPs installed in response to the NOV, submit a copy of the REAP for the 11/15/2017-11/18/2017 storm event, and submit a copy of inspection reports and sampling results for the 11/16/2017 storm event.	-	In Progress
3	SEL	3C3804 Y to Trout Creek	5/16/2018	Staff Enforcement Letter (SEL) for various construction site BMP deficiencies in violation of RB Order R6T-2016-0010 Section VIII noted in the 05/15/2018 inspection report by Liz van Diepen. SEL states to make corrections, enter correction date and notes on the inspection report signed by the QSP, and return to her ASAP.	SEL states to make corrections, enter correction date and notes on the inspection report signed by the QSP, and return to her	-	In Progress
4	None	-	-	-	-	-	-



**Table D-2: Summary of Response to Enforcement Actions  
July 1, 2017 to June 30, 2018**

District	Enforcement Action Type	Project Name and/or Identification Number	Incident Date	Incident Summary	Caltrans Response Required	Incident Resolution Date	Status
5	SEL	Highway 46 Whitley 2B Project	12/5/2017	Caltrans received an SEL following an inspection on 11/16/2017 and 11/21/2017, detailing findings of deficient BMPs in violation of the Construction General Permit.	Caltrans to correct deficient BMPs by 12/15/2017 and submit photographic evidence to the Central Coast RWQCB.	12/15/2017	Resolved
5	NOV	Highway 46 Whitley 2B Project	1/25/2018	NOV associated with deficient BMP findings in previous SEL on 12/5/2017, in violation of the Construction General Permit.	Unknown. BMP deficiencies that occurred on 11/17/2017, detailed in SEL on 12/05/2017, lists corrective action in CIWQS as Caltrans to send certified written response no later than 02/28/2018 that either confirms the outlined correction of the violations or identifies a date by which the violations will be corrected.	-	In Progress
6	None	-	-	-	-	-	-
7	EPL	Route 105 Dewatering Project	8/22/2017	Caltrans received an EPL No. R4-2017-0157 for effluent exceedances, in violation of order R4-2013-0043.	Caltrans to respond to EPL.	-	N/A
7	EPL	Route I-10 Pavement Rehab. Project	8/22/2017	Caltrans received an EPL No. R4-2017-0158 for Nitrogen effluent exceedances, in violation of order R4-2013-0095.	Caltrans to respond to EPL or pay assessed penalty of 90,000.	2/2/2018	Resolved

**Table D-2: Summary of Response to Enforcement Actions  
July 1, 2017 to June 30, 2018**

District	Enforcement Action Type	Project Name and/or Identification Number	Incident Date	Incident Summary	Caltrans Response Required	Incident Resolution Date	Status
7	ACL	Route 105 Dewatering Project	11/3/2017	Caltrans received ACL No. R4-2017-0157 to pay the \$36,000 penalty for effluent exceedances for Trichloroethene, 1,1-Dichloroethylene, and Vinyl Chloride in violation of Order No. R4-2013-0043.	Caltrans to pay 36,000	-	Pending
7	ACL	Route I-10 Pavement Rehab. Project	2/2/2018	Stipulated order on settlement offer no. R4-2017-0158 for effluent exceedances for Nitrogen in violation of order No. R4-2013-0095 for a total liability of \$81,000.	Caltrans to pay settlement amount of \$81,000 by March 5, 2018.	-	Pending
8	NNC	Route 15 Bridge Decks Surfacing and Transverse Connectors	7/27/2017	Caltrans failed to submit the 2015-2016 Annual Report by the due date.	Caltrans to submit 2015-2016 Annual Report	-	Other
8	SEL	Highway 138 Realignment	9/1/2017	SEL request for revisions of WPCP drawings, specification for hydro mulch and seed, specifications for culvert energy dissipation, and updated drawings for planned 2017 wet season BMPs.	Caltrans to submit requested information.	-	N/A

**Table D-2: Summary of Response to Enforcement Actions  
July 1, 2017 to June 30, 2018**

District	Enforcement Action Type	Project Name and/or Identification Number	Incident Date	Incident Summary	Caltrans Response Required	Incident Resolution Date	Status
8	OC	C.V. Kane Safety Roadside	5/8/2018	Three reporting violations dated 01/30/2017, 01/30/2017, and 12/31/2017. The Board Order No. R6V-1994-0100 was violated for the following reasons (1) Annual SMR was submitted 30 days late (MRP II.C), (2) Failure to provide parameters related to Flow and Effluent Monitoring (MRP I.A. 1-4 and I.B), and (3) Failure to provide parameters related to Flow Monitoring (MRP I.A. 1-4).	Unknown, Oral Communication only.	-	N/A
9	None	-	-	-	-	-	-
10	None	-	-	-	-	-	-
11	NOV	Hallmark West Mitigation Project	10/17/2017	Caltrans received NOV No. R9-2017-0162 for failure to submit the 2016-2017 Annual Report, in violation of the Construction General Permit.	Caltrans to submit the 2016-2017 Annual Report.	Annual Report will be submitted by 08/15/2018	This project was closed out and we received NOT on 09/27/16.
11	NOV	Oceanside Barriers Project	10/20/2017	Caltrans received NOV No. R9-2017-0163 for failure to submit the 2016-2017 Annual Report, in violation of the Construction General Permit.	Caltrans to submit the 2016-2017 Annual Report.	2016-2017 Annual Report submitted 11/15/17. 2017-2018 Annual Report submitted 2/27/18	Resolved

**Table D-2: Summary of Response to Enforcement Actions  
July 1, 2017 to June 30, 2018**

District	Enforcement Action Type	Project Name and/or Identification Number	Incident Date	Incident Summary	Caltrans Response Required	Incident Resolution Date	Status
11	SEL	Restore, Repair of Embankment and Culvert near Indian Oaks Road on SR-78 (EA 42700)	1/10/2018	Caltrans did not submit a Final Project Completion Report within 30 days of project completion.	Caltrans to submit Final Project Completion Report.  Caltrans to pay 17-18 FY Annual fee by 01/26/2018. Caltrans will continue to be charged the Annual fee until Final Project Completion Report is submitted.	Final Project Completion Report submitted to Regional Board and fee was paid on 2/28/18.	Resolved
11	SEL	Interstate 5 North Coast Corridor, Solana Beach	3/13/2018	Caltrans did not submit a self-monitoring reports for groundwater extraction discharge	Caltrans notify San Diego RWQCB that no flow statement was included in the annual report submitted on 2/21/18	San Diego RWQCB informed Caltrans that they were able to locate the document via email on 4/13/18	Resolved
11	SEL	Interstate 8 Safety Improvement (EA 41480)	2/26/2018	Bill received from RWQCB, for enrollment in WD-0134480/due date was 1/26/18/. Bill received on 2/26/18.	Bill was paid on 3/12/18, \$200.00/Project work is still continuing, has not been completed. Estimated completion date is 3/26/19.	Completion report anticipated to be submitted on 4/15/19.	Resolved
12	NNC	Route 133 to I-5 Connectors Deep Injection Grouting	9/18/2017	Caltrans failed to submit the 2016-2017 Annual Report by the due date 9/2/2017.	Caltrans to submit the 2016-2017 Annual Report	9/19/2017	Was submitted on 9/19/2017.
12	NNC	Route 261 Slope Revegetation	9/18/2017	Caltrans failed to submit the 2016-2017 Annual Report by the due date 9/2/2017.	Caltrans to submit the 2016-2017 Annual Report	9/20/2017	Was submitted on 3/9/2018.
12	NNC	Route 241 Slope Revegetation	9/18/2017	Caltrans failed to submit the 2016-2017 Annual Report by the due date 9/2/2017.	Caltrans to submit the 2016-2017 Annual Report	10/30/2017	Was submitted on 10/30/2017.

**Table D-2: Summary of Response to Enforcement Actions  
July 1, 2017 to June 30, 2018**

District	Enforcement Action Type	Project Name and/or Identification Number	Incident Date	Incident Summary	Caltrans Response Required	Incident Resolution Date	Status
12	NNC	Route 55 Highway Planting and Irrigation	9/18/2017	Caltrans failed to submit the 2016-2017 Annual Report by the due date 9/2/2017.	Caltrans to submit the 2016-2017 Annual Report.		The Annual report was submitted on 9/20/2018.
12	NOV	Rte 74 Shoulder Widening	10/20/2017	Caltrans received NOV No. R9-2017-0164 for failure to submit the 2016-2017 Annual Report, in violation of the Construction General Permit.	Caltrans to submit the 2016-2017 Annual Report.	10/24/2017	Was submitted on 10/24/2017.
12	SEL	Rte 405 Barrier Installation	3/22/2018	Caltrans received a SEL following the 3/15/18 inspection for inadequate BMPs including waste management, housekeeping, and inlet protection in violation of the Construction General Permit.	Caltrans to correct BMP deficiencies immediately and submit a letter describing the actions taken to resolve the issues outlined in the SEL by 4/10/18.	4/9/2018	Resolved

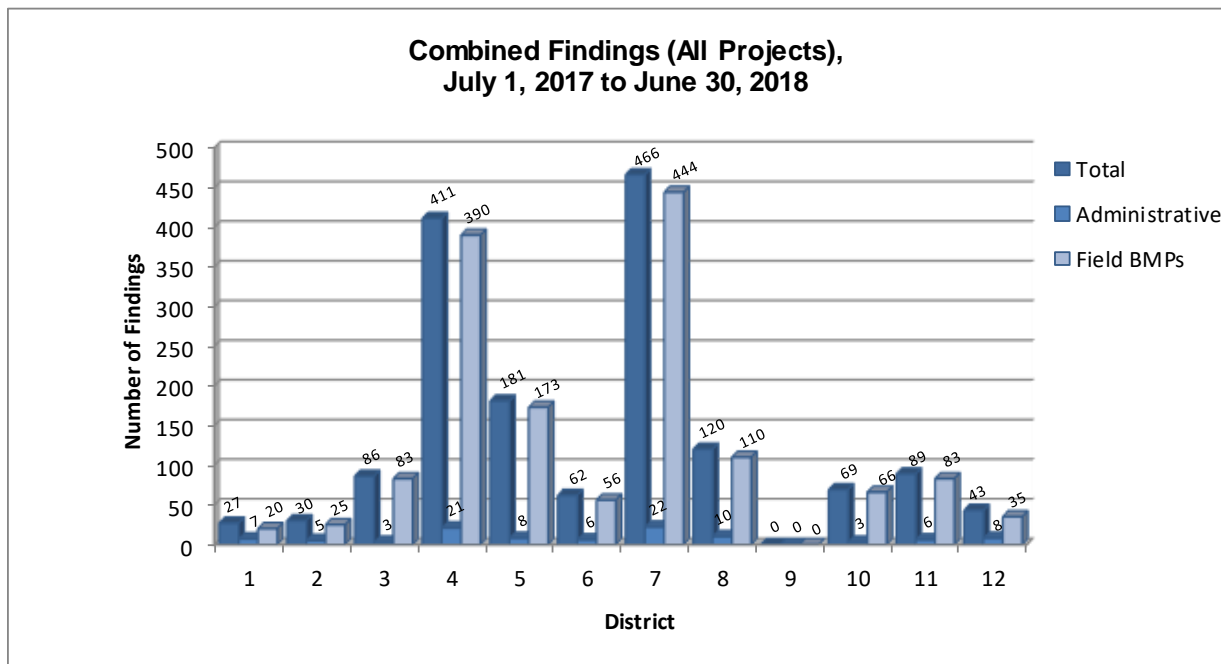
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## Construction Self-Audit Compliance Monitoring

### Combined Review Results

Figure D-1 and Table D-3 present a summary of the total numbers of Independent Quality Assurance (IQA) review findings. The total numbers are further divided into totals of administrative and field BMP findings. Some districts were visited more than others because of the number of projects and the project ranking process. Items of note in the following table are as follows:

- 180 IQA Reviews were conducted in the reporting period
- Construction projects were visited in all districts
- Very few administrative findings were noted during the IQA review. Administrative findings averaged less than one per IQA review.
- Total findings (Administrative and Field BMP) averaged approximately nine per IQA review which is an improvement from approximately 10 BMP findings per IQA review during the 2016-2017 reporting period.



*Figure D-1: Combined Findings (All Projects), July 1, 2017 to June 30, 2018*

*Table D-3: Summary of Findings July 1, 2017 to June 30, 2018*

District	Number of Sites Reviewed	Number of Findings		
		Total	Administrative	Field BMPs
1	11	27	7	20
2	6	30	5	25
3	7	86	3	83
4	31	411	21	390
5	14	181	8	173
6	9	62	6	56
7	47	466	22	444
8	12	120	10	110
9	2	0	0	0
10	7	69	3	66
11	24	89	6	83
12	10	43	8	35
<b>Total</b>	<b>180</b>	<b>1,584</b>	<b>99</b>	<b>1,485</b>

### **Administrative Findings**

Table D-4 and Figure D-2 presents the summary of administrative findings separated into several categories. The definitions of each category are as follows:

- **Plans and Permits:** Whether the SWPPP is located on site and was it developed by a Qualified Stormwater Developer (QSD).
- **Training:** Whether the Water Pollution Control Manager (WPCM) is certified as a QSD (or Qualified Stormwater Practitioner (QSP) for Water Pollution Control Program (WPCP) construction projects) and is the contractor conducting regular training with adequate documentation.
- **SMARTS:** Whether appropriate annual reporting is uploaded into SMARTS.
- **ATS:** For construction projects that employ an ATS, are all the required procedures of the ATS followed.
- **Construction Site Monitoring:** Whether all the site monitoring has been completed, and if a NAL has been exceeded, has a report been developed and reported to the SWRCB.
- **Tahoe Permit:** Questions regarding the following:
  - 1) For projects within the Tahoe Permit, has a Restoration Monitoring Plan been developed?
  - 2) Are there waste prohibition exemptions on file (100 year floodplain)?
  - 3) Have all analytical information been uploaded into SMARTS within 5

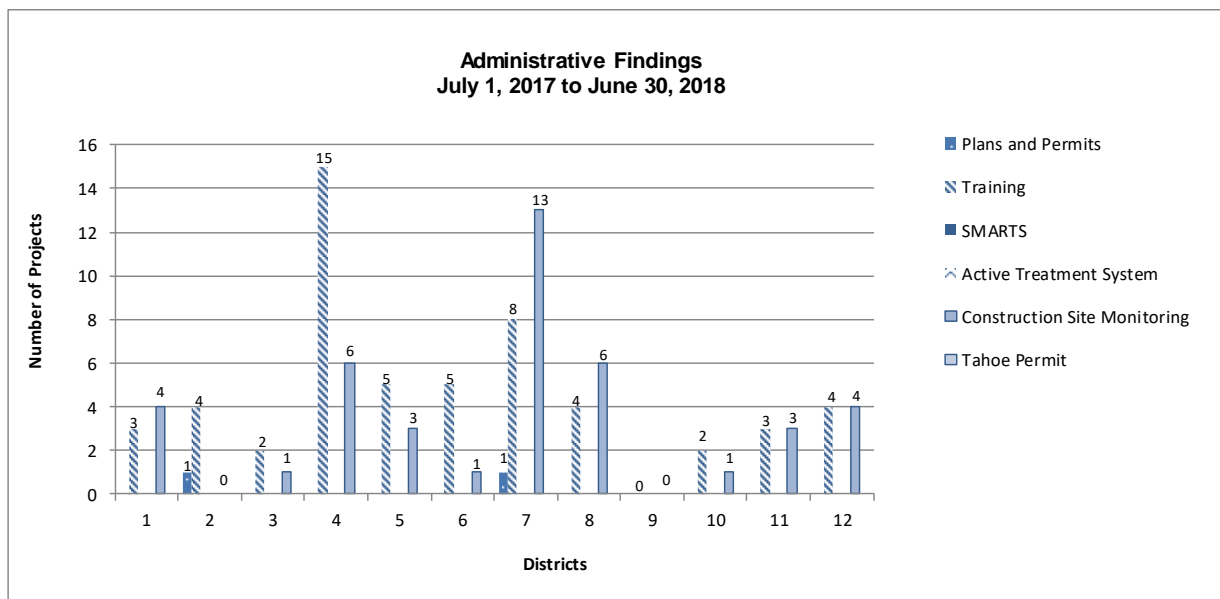
Items of note in the following table are as follows:

- No findings were encountered for administrative categories related to the Tahoe Permit.
- Findings in the Training category were encountered most frequently of all administrative categories.
- Construction Site Monitoring was mostly implemented at reviewed sites. The IQA reviewer at 21.1% of the construction projects (four projects were found to have multiple Construction Site Monitoring findings) encountered no construction site monitoring findings.



**Table D-4: Summary of Administrative Findings**

District	Number of Sites Reviews	Total Findings	Administrative Category					
			Plans and Permits	Training	SMARTs	Active Treatment Systems	Construction Site Monitoring	Tahoe Permit
1	11	7	0	3	0	0	4	0
2	6	5	1	4	0	0	0	0
3	7	3	0	2	0	0	1	0
4	31	21	0	15	0	0	6	0
5	14	8	0	5	0	0	3	0
6	9	6	0	5	0	0	1	0
7	47	22	1	8	0	0	13	0
8	12	10	0	4	0	0	6	0
9	2	0	0	0	0	0	0	0
10	7	3	0	2	0	0	1	0
11	24	6	0	3	0	0	3	0
12	10	8	0	4	0	0	4	0
<b>Total</b>	<b>180</b>	<b>99</b>	<b>2</b>	<b>55</b>	<b>0</b>	<b>0</b>	<b>42</b>	<b>0</b>



**Figure D-2: Administrative Findings (All Projects), July 1, 2017 to June 30, 2018**

**Field BMP Findings**

Table D-5 and Figure D-3 presents a summary of the field BMP findings separated into the six standard field BMP categories as follows:

- **Soil Stabilization:** Includes preservation of vegetation, temporary cover of DSAs, temporary run-on and run-through control, and streambank stabilization.
- **Sediment Control:** Includes temporary perimeter control, temporary face of slope controls, temporary check dams and temporary drain inlet protection.

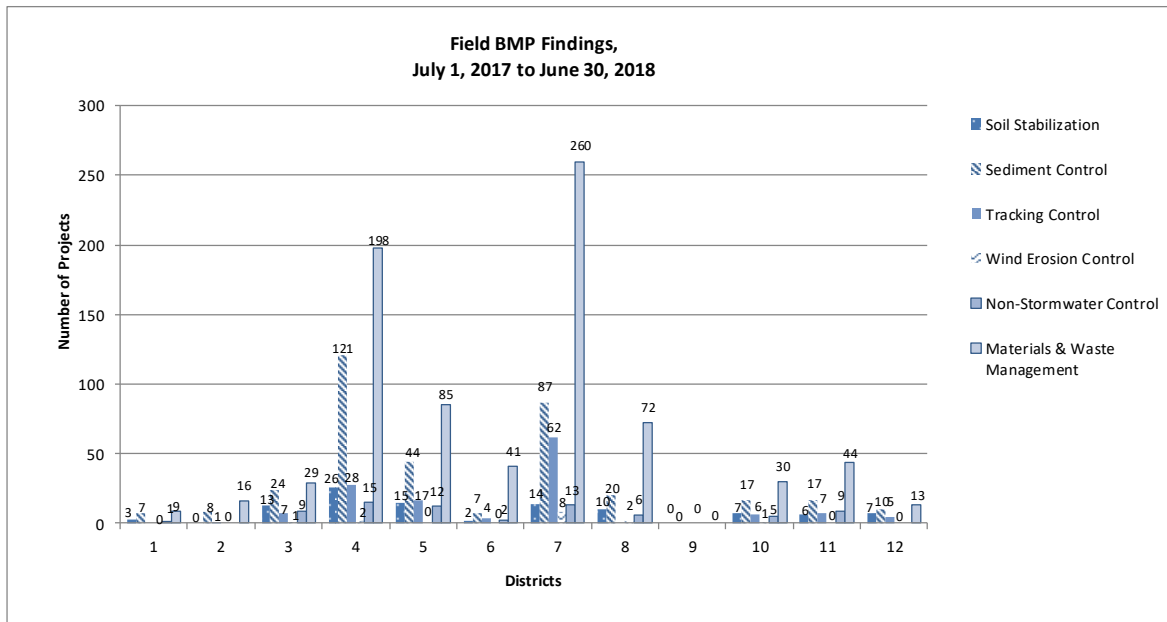
- **Tracking Control:** Includes stabilized construction entrances and construction roadways.
- **Wind Erosion Control:** Includes the control of dust throughout the construction site.
- **Non-Stormwater Control:** Includes dewatering, paving and sawcutting operations, temporary stream crossings and clear water diversions, equipment cleaning, fueling, and maintenance, pile driving operations, and working near and over water.
- **Materials and Waste Management Control:** Includes material storage and use, stockpile management, spill prevention and control, and waste management including solid, hazardous, contaminated soil, concrete, sanitary, and liquid wastes.

Items of note in the following table are as follows:

- The field BMP category of Materials and Waste Management Control constituted 53.7% of the total findings.
- The field BMP category of Sediment Control constituted 24.4% of the total findings.
- The remaining, combined field BMP categories of Soil Stabilization, Tracking Control, Wind Erosion Control, and Non-Stormwater Control constituted 21.9% of the total findings.

*Table D-5: Summary of Field BMP Findings*

District	Number of Sites Reviews	Total Findings	Field BMP Category					
			Soil Stabilization	Sediment Control	Tracking Control	Wind Erosion Control	Non-Stormwater Control	Material & Waste Management
1	11	20	3	7	0	0	1	9
2	6	25	0	8	1	0	0	16
3	7	83	13	24	7	1	9	29
4	31	390	26	121	28	2	15	198
5	14	173	15	44	17	0	12	85
6	9	56	2	7	4	0	2	41
7	47	444	14	87	62	8	13	260
8	12	110	10	20	0	2	6	72
9	2	0	0	0	0	0	0	0
10	7	66	7	17	6	1	5	30
11	24	83	6	17	7	0	9	44
12	10	35	7	10	5	0	0	13
<b>Total</b>	<b>180</b>	<b>1,485</b>	<b>103</b>	<b>362</b>	<b>137</b>	<b>14</b>	<b>72</b>	<b>797</b>



**Figure D-3: Field BMP Findings, July 1, 2017 to June 30, 2018**

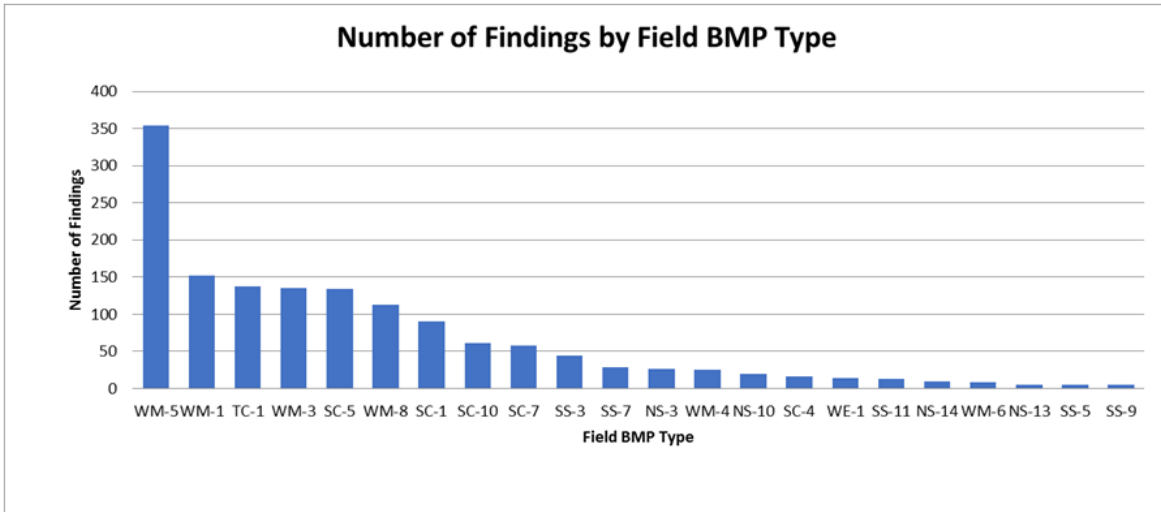
**BMP Findings of Field BMP Types and Trends**

Table D-6 presents a summary of the field BMP findings by field BMP type and specific IQA reviewer observations.

Each field BMP type has standards that regulate the correct application (e.g., is the BMP implemented or implemented as intended?), the correct installation or placement, utilizing the correct materials, and the proper maintenance. The following table indicates the number of findings for each field BMP type that did not meet one of these listed standards.

**Table D-6: Findings of Field BMP Types July 1, 2017 to June 30, 2018**

BMP Category	BMP Type	BMP Name	Number of Findings	
Soil Stabilization	SS-3	Hydraulic Mulch	44	
	SS-4	Hydroseeding	3	
	SS-5	Soil Binder	5	
	SS-6	Straw Mulch	3	
	SS-7	Geotextiles, Mats, Plastic Covers and Erosion Control Blankets	29	
	SS-9	Earth Dikes/Drainage Swales and Lined Ditches	5	
	SS-10	Outlet Protection/Velocity Dissipation Devices	1	
	SS-11	Slope Drains	13	
Sediment Control	SC-1	Silt Fence	90	
	SC-2	Sediment Basin	0	
	SC-4	Check Dams	16	
	SC-5	Fiber Rolls	134	
	SC-6	Gravel Bag Berm	3	
	SC-7	Street Sweeping and Vacuuming	58	
	SC-9	Temporary Straw Bale Barrier	0	
	SC-10	Storm Drain Inlet Protection	61	
Tracking Control	TC-1	Stabilized Construction Entrance	137	
	TC-2	Stabilized Construction Roadway	0	
Wind Erosion Control	WE-1	Wind Erosion Control	14	
Non-Stormwater Control	NS-1	Water Conservation Practices	2	
	NS-2	Dewatering Operations	0	
	NS-3	Paving and Grinding Operations	26	
	NS-6	Illicit Connection/Illegal Discharge	3	
	NS-8	Vehicle and Equipment Cleaning	0	
	NS-9	Vehicle and Equipment Fueling	3	
	NS-10	Vehicle and Equipment Maintenance	20	
	NS-11	Pile Driving Operations	2	
	NS-12	Concrete Curing	1	
	NS-13	Materials and Equipment Use Over Water	5	
	NS-14	Concrete Finishing	10	
	NS-15	Structure Demolition Adjacent to Water	0	
	Materials and Waste Management	WM-1	Material Delivery & Storage	152
		WM-2	Material Use	4
		WM-3	Stockpile Management	135
WM-4		Spill Prevention and Control	25	
WM-5		Solid Waste Management	354	
WM-6		Hazardous Waste Management	8	
WM-7		Contaminated Soil Management	1	
WM-8		Concrete Waste Management	113	
WM-9		Sanitary/Septic Waste Management	4	
WM-10		Liquid Waste Management	1	



**Figure D-4: Findings of Field BMP Types  
July 1, 2017 to June 30, 2018**

The top ten BMPs with the most findings total 1,278 which constituted 86.1% of total findings. Although the order has changed slightly, all field BMP types (from 180 IQA Reviews) in FY 2017/2018 were in the top 10 BMP types (from 242 IQA Reviews) in FY 2016/2017 and (from 236 IQA Reviews) in FY 2015/2016. The ten field BMP types are as follows:

1. WM-5, Solid Waste Management	354
2. WM-1, Material Delivery and Storage	152
3. TC-1, Stabilized Construction Entrance	137
4. WM-3, Stockpile Management	135
5. SC-5, Fiber Rolls	134
6. WM-8, Concrete Waste Management	113
7. SC-1, Silt Fence	90
8. SC-10, Storm Drain Inlet Protection	61
9. SC-7, Street Sweeping and Vacuuming	58
10. SS-3, Hydraulic Mulch	44
<b>Top 10 Totals</b>	<b>1,278</b>

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