

Jennifer B.



California Regional Water Quality Control Board Central Coast Region



Terry Tamminen
Secretary for
Environmental
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Arnold Schwarzenegger
Governor

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October 15, 2004

Coast Unified School District
2950 Santa Rosa Creek Road
Cambria, CA 93428

GENERAL CONSTRUCTION STORM WATER PERMIT (GENERAL PERMIT): CAMBRIA ELEMENTARY SCHOOL, SAN LUIS OBISPO COUNTY, WDID# 3 40C326427

Mr. Denis deClercq:

Jennifer Bitting and Kimberly Gonzalez of my staff, met with Marcia Walther, Fred Roinestad, and Wayne Haserot at the Cambria Elementary School site on October 14, 2004 to tour the site and review the Storm Water Pollution Prevention Plan (SWPPP).

Regional Board staff are very concerned about the potential for sediment laden storm water to be discharged from this site.

There are two locations shown below, where storm water will leave the property to flow to off-site wetland areas. Photos 1 and 2 show the first location and Photos 3 and 4 show the second.

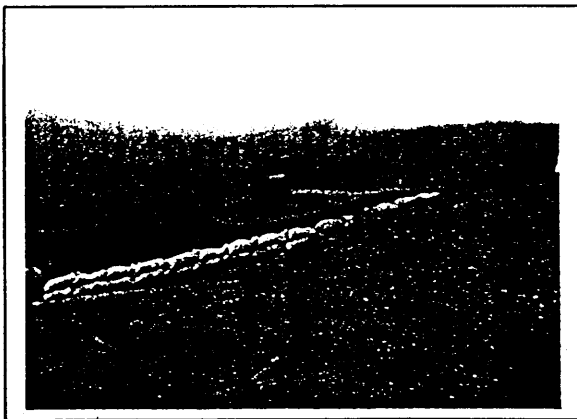


Photo 1 - Approach to northern discharge location.

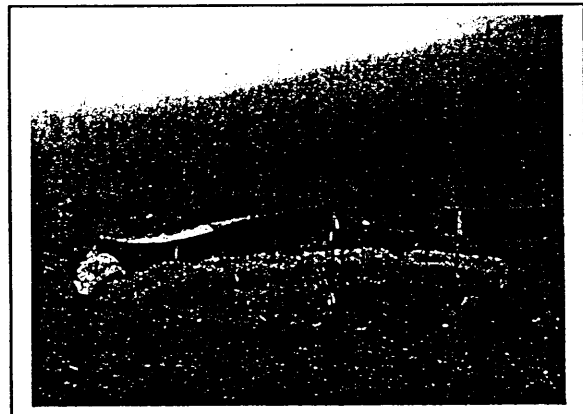


Photo 2 - Sediment trap for northern discharge location.

Photo 1 shows the approach to the discharge location on the northern side of the property. Regional Board staff are concerned that, although the soil on the left side of the road has been hydromulched, the water flowing over the road itself and over the soil to the right of the road, will pick up sediment before it leaves the property line. The sediment trap constructed of hay bales and shown in Photo 2 appears to be too small to allow time for detention so that sediments might settle out. Please include design calculations for the sediment trap in the amended SWPPP.

California Environmental Protection Act



Item No. 18 Attachment No. 1
March 24-25, 2005 Meeting
Coast Unified School District
Cambria Elementary School



Photo 3 – Sediment trap for southern discharge location.

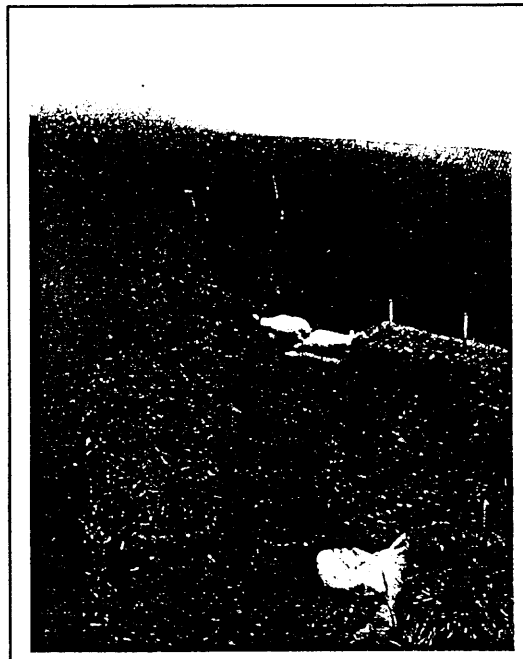


Photo 4 – Approach to southern discharge location.

Photo 4 shows the approach to the discharge location on the southern side of the property. Regional Board staff concerns are similar at this discharge location. It appears that water flowing over the road itself and over the area draining to this point will pick up sediment before it leaves the property line. The sediment trap constructed of hay bales and shown in Photo 3 appears to be too small to allow time for detention so that sediments might settle out. Please include design calculations for this sediment trap, and any others on the property that are similar, in the amended SWPPP.

Regional Board staff found many unprotected stockpiles located throughout the site. Staff are concerned that, although there are sediment control Best Management Practices (BMPs) stockpiled on site for use, due to the size of some of the stockpiles, sediment control measures may be overwhelmed. Erosion control measures may be necessary to prevent stockpiles from eroding and contributing sediment to storm water leaving the site. Please ensure that stockpile management is included in the amended SWPPP.

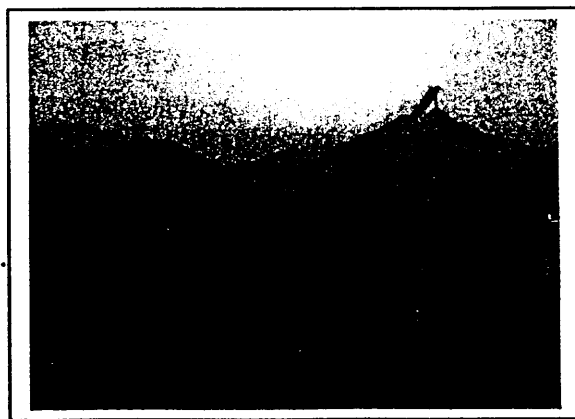


Photo 5 – Example of unprotected stockpiles on site.



Photo 6 – Stockpile located near drainage way.



Photo 7 – Stockpile located near drainage way.

Photos 6 and 7 are two views of the same stockpile located across the street from the Cambria Elementary School construction site. This area should be included in the amended SWPPP as it is a part of the construction project. Regional Board staff are concerned about the size and the close proximity of the stockpile to the drainage way.

Regional Board staff found that the SWPPP on site needed to be updated. For example, the SWPPP listed on page 500-10, Michael Solano as the trained SWPPP inspector, when in fact there is someone else performing this duty. **Please update the SWPPP and submit a signed copy to our office on or before October 29, 2004.**

Currently, rain is forecast in Cambria for Sunday, October 17, through Wednesday, October 20 (20-30% chance, www.weather.com). Although the amended SWPPP is not required to be submitted until October 29, 2004, Coast Unified School District is responsible for compliance with the terms of the General Construction Storm Water Permit and prevent sediment laden storm water from being discharged from the site.

If you have questions or concerns regarding this matter, please contact Jennifer Bitting at (805) 549-3334, or jbitting@rb3.swrcb.ca.gov.

Sincerely,

Chris Adair

for

Roger Briggs
Executive Officer



Terry Tamminen
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Central Coast Region



Arnold Schwarzenegger
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November 10, 2004

Coast Unified School District
2950 Santa Rosa Creek Road
Cambria, CA 93428

NOTICE OF VIOLATION – GENERAL CONSTRUCTION STORM WATER PERMIT (GENERAL PERMIT): CAMBRIA ELEMENTARY SCHOOL, SAN LUIS OBISPO COUNTY, WDID# 3 40C326427

Mr. Denis deClercq:

Thank you for submitting the site's amended Storm Water Pollution Prevention Plan (SWPPP) on October 29, 2004 as requested in our October 15, 2004 letter.

Our letter requested design calculations for the sediment traps in the amended SWPPP. However, the SWPPP we received on October 29, 2004 does not contain sediment trap design calculations specific to the sediment traps shown on the site plan (revised 10/28/04). Regional Board staff have had conversations with the contractor concerning advanced treatment and filtration systems. **If filtration systems will be used, please describe the system in an amendment to the SWPPP. If sediment traps will still be used, please submit an amended SWPPP, that includes design calculations for the sediment traps on site, to the Regional Board office by November 24, 2004.**

On October 26, 2004, Jennifer Bitting, of my staff, met with Fred Roinestad, and Wayne Haserot of A.J. Diani, Karl Mikel of Morro Group, and Department of Fish and Game Warden Todd Tognazzini, at the Cambria Elementary School site to conduct a Construction Storm Water Permit compliance inspection.

Regional Board staff witnessed sediment laden storm water being discharged from the site to Fiscalini Creek which flows to Santa Rosa Creek. This discharge is a violation of the General Permit.

Only one discharge location is shown in the photographs below; however, sediment laden water was being discharged from the site in more than one location. Photo 1 shows the discharge of sediment laden water from the sediment trap to a drainage way that passes under Main Street. Photo 2 shows the discharge of sediment laden water from the culvert passing under Main Street. to Fiscalini Creek. Photo 3 shows the confluence of the discharge with Fiscalini Creek.

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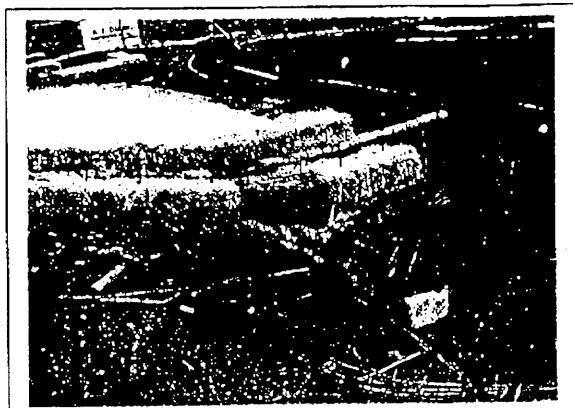


Photo 1



Photo 2

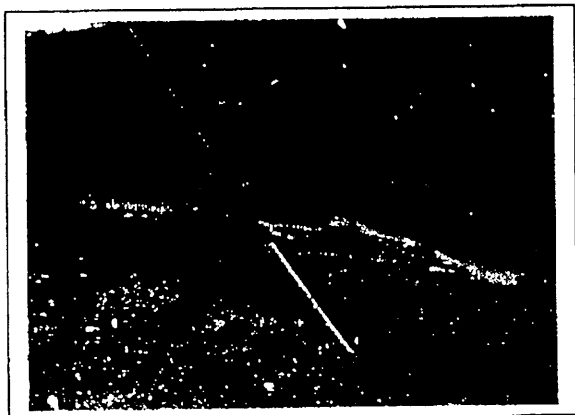


Photo 3

Attachment G of the site's SWPPP calls for maintenance and repair of BMPs as needed. Please ensure that the BMPs on site are implemented, maintained, and/or repaired before the next rain.

Currently, rain is forecast in Cambria for Thursday, November 11 (50% chance, www.weather.com). Although the amended SWPPP is not required to be submitted until November 24, 2004, Coast Unified School District is responsible for compliance with the terms of the General Construction Storm Water Permit and to prevent sediment laden storm water from being discharged from the site.

If you have questions or concerns regarding this matter, please contact Jennifer Bitting at (805) 549-3334, or jbitting@rb3.swrcb.ca.gov.

Sincerely,

Chris Adair

for

Roger Briggs
Executive Officer

California Environmental Protection Agency



Recycled Paper

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Alan C. Lloyd, Ph.D.
Agency Secretary

California Regional Water Quality Control Board

Central Coast Region



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January 24, 2005

Coast Unified School District
2950 Santa Rosa Creek Road
Cambria, CA 93428

SECOND NOTICE OF VIOLATION - GENERAL CONSTRUCTION STORM WATER PERMIT (GENERAL PERMIT): CAMBRIA ELEMENTARY SCHOOL, SAN LUIS OBISPO COUNTY, WDID# 3 40C326427

Mr. Denis deClercq:

On January 7, 2005, Jennifer Bitting, of my staff, inspected the Cambria Elementary School construction site (Site) with Bob Sloan and Karl Mikel of the Morro Group, and Mike Hill from the Department of Fish and Game.

A cover letter attached to the most recently submitted version of the Site Storm Water Pollution Prevention Plan (SWPPP), dated November 24, 2004, states,

"we have updated our (Best Management Practice) BMP system based upon the premise of capturing any and all of the storm water from a storm event, and filtering it before it is discharged off of the site."

Regional Board staff witnessed sediment laden storm water being discharged from the Site, with out filtration, to the blue line stream, referred to as Fiscalini Creek, which flows to Santa Rosa Creek. This discharge is a violation of the General Construction Storm Water Permit.

Photo 1 shows the discharge of sediment laden water from a Site basin to a drainage way that passes under Main Street. Photo 2 shows the confluence of the discharge with Fiscalini Creek.

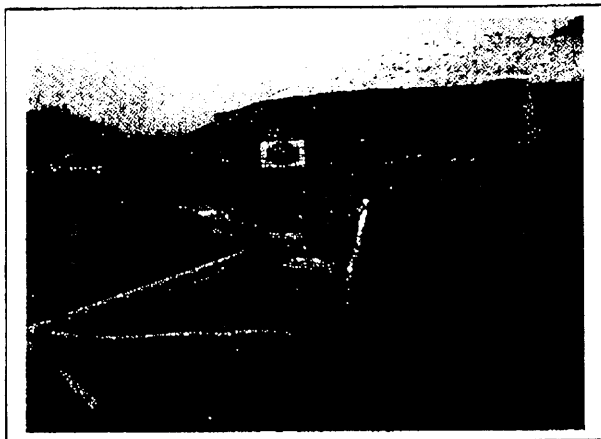


Photo 1 - Basin overflowing

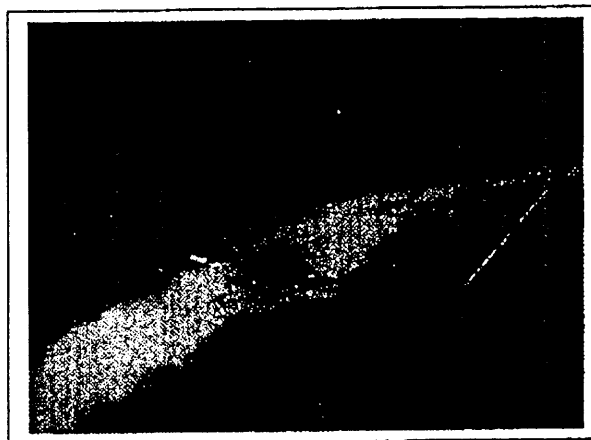


Photo 2 - Confluence of discharge with Fiscalini Creek

Photo 3 shows the discharge of sediment laden water from a hale bale barrier off site, onto a neighboring property and into a drainage way that leads to Fiscalini Creek.

California Environmental Protection Agency





Photo 3 – Discharge of sediment laden water from hay bale barrier off Site

Section B.8. of the General Permit requires a monitoring program for pollutants not visually detectable in storm water. Section 600.5 of the Site's SWPPP describes the sampling and analysis plan for non-visible pollutants. Section 600.5.1 states,

“Sampling for non-visible pollutants will be conducted when there is a potential for discharge of non-visible pollutants to surface waters or (a) drainage system.”

At the time of inspection, a bag of Storm-Klear Gel-Floc was found in the path of flowing storm water (Photo 4). The storm water flowed over the Gel-Floc bag and into a basin that was overflowing to a drainage way that passes under Main Street to Fiscalini Creek (Photo 1). The label on the Storm-Klear Gel-Floc product (Photo 5) advises the consumer to check with your local, State and/or Federal environmental regulators prior to use; to deploy only in areas upstream of settling basins or biofiltration areas or particle filters; and not deploy in streams, lakes, rivers, bays, or other natural waterways. The Regional Board had no record of the School District or it's contractors requesting permission to use this product. Regional Board staff do not recommend the use of this product in areas where there is no retention basin, biofiltration, or particle filtration before discharge to a surface water body. Please submit, to this office, the results of any samples analyzed in accordance with Section 600.5 of the SWPPP.



Photo 4 – Storm-Klear Gel-Floc in the path of flowing storm water

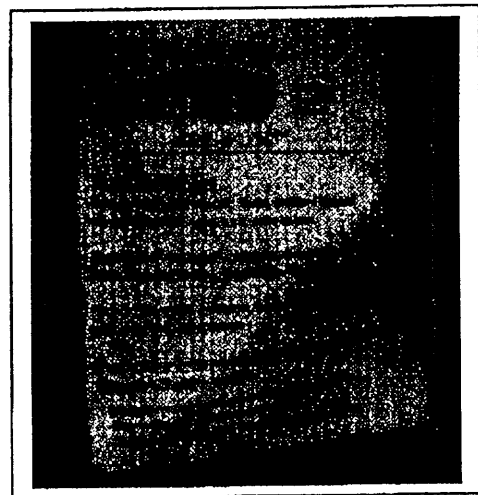


Photo 5 – Storm-Klear Gel-Floc product label

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The Site's SWPPP lists BMPs for Waste Management and Materials Pollution Control in Section 500.3.9. The Spill Prevention and Control BMP states,

"If maintenance must occur on site, use a designated area and a secondary containment, located away from drainage courses, to prevent the run on of storm water and the runoff of spills."

However, while on Site, Regional Board staff found a motor oil bottle floating in the basin on the top tier of the project (Photo 6). The bottle was surrounded by an oily sheen and water was being pumped from the basin (Photo 7) to the neighbor's property (Photo 3) which flows to the drainage way that passes under Main Street to Fiscalini Creek. Construction vehicles were parked nearby (Photo 7) and an oily sheen could be seen flowing from the vehicle area to the basin. Although the General Permit requires in Section A.5.b.4 that the SWPPP show areas designated for the vehicle storage and service areas, these areas are not depicted on the SWPPP. **Please amend the SWPPP and submit an updated version, to this office, on or before February 7, 2005.**

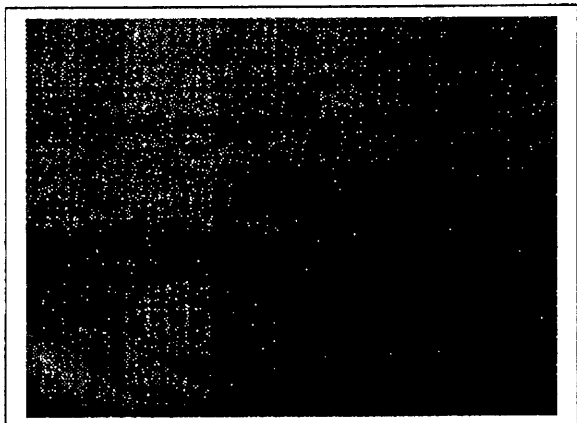


Photo 6 - Motor oil bottle floating in top tier basin

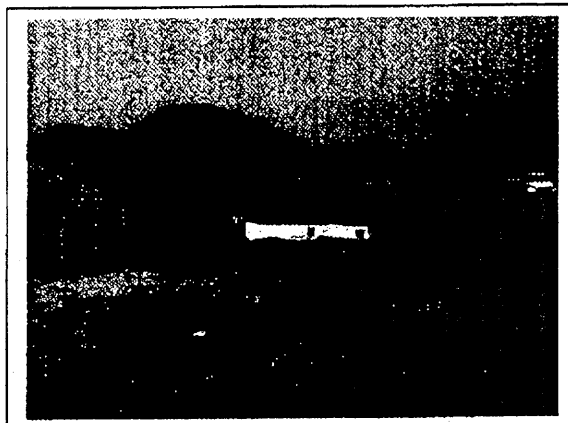


Photo 7 - Top tier basin, vehicles parked nearby

The General Permit requires the use of an effective combination of erosion and sediment control measures. Although some of the stockpiles on Site have been hydromulched, it is evident that this is not an effective erosion control measure (Photo 8). The sediment control measures in place, which consist of silt fence and hay bale barriers channel storm water to a low point where water then flows through a pipe, protected by one unmaintained fiber roll (Photo 9), into a basin that was being pumped off Site at the time of the inspection. The stockpile BMPs in place on Site do not meet the General Permit requirement of an effective combination of erosion and sediment control measures. Please re-evaluate the BMPs in place and amend the SWPPP. **Submit an updated SWPPP addressing better stockpile management practices, to this office, on or before February 7, 2005.**

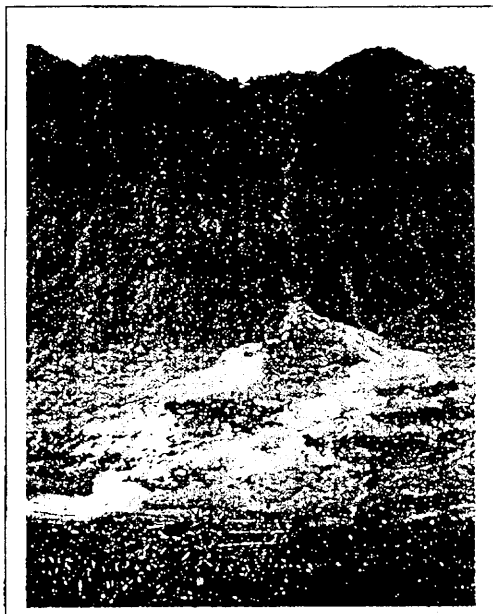


Photo 8 - Eroded hydromulched stockpile



Photo 9 - Hay bales around the stockpile, water flowing under the fiber roll into the pipe

Attachment G of the site's SWPPP calls for maintenance and repair of BMPs as needed. The BMPs on Site must be implemented, maintained, and/or repaired before the next rain.

According to the Morro Group, the sediments deposited in Fiscalini Creek and on Mr. Fitzhugh's property will be removed beginning January 20, 2005. **Please submit, to this office, a report detailing the clean up efforts once the removal is complete.**

Coast Unified School District is responsible for compliance with the terms of the General Construction Storm Water Permit and to prevent sediment laden storm water from being discharged from the site.

If you have questions or concerns regarding this matter, please contact Jennifer Bitting at (805) 549-3334, or jbitting@rb3.swrcb.ca.gov.

Sincerely,

Roger W. Briggs
Executive Officer

CC: Fred Roinestad
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