

STATE OF COLORADO

John W. Hickenlooper, Governor
Christopher E. Urbina, MD, MPH
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Laboratory Services Division
Denver, Colorado 80246-1530 8100 Lowry Blvd.
Phone (303) 692-2000 Denver, Colorado 80230-6928
Located in Glendale, Colorado (303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

April 4, 2011

The Corporation Company, Registered Agent
Reynolds, Inc.
1675 Broadway, Suite #1200
Denver, Colorado 80202

Certified Mail Number: 7005 1820 0000 3213 7399

**RE: Expedited Settlement Agreement, Number: ES-110404-3
CDPS Permit No: COR-03E135**

Dear The Corporation Company:

Enclosed for your records you will find Reynolds, Inc.'s copy of the recently executed Expedited Settlement Agreement ("ESA"). Please be advised that the first page of the ESA was changed in order to place the correct ESA Number on the final document. The ESA is now fully enforceable and constitutes a final agency action.

As specified in the enclosed ESA, Reynolds, Inc. must, within fifteen (15) calendar days, submit a certified or cashier's check for the amount specified in the ESA to the Water Quality Control Division in order for this matter to be resolved.

If you have any questions, please don't hesitate to contact Michael Harris at (303) 692-3598 or by electronic mail at michael.harris@state.co.us.

Sincerely,

Russell Zigler, Legal Assistant
Compliance Assurance Section
WATER QUALITY CONTROL DIVISION

cc: Weld County Dept. of Public Health and Environment

cc: Aaron Urdiales, EPA Region VIII
Gary Beers, Permits Unit, CDPHE

Enclosure(s)



Colorado Department of Public Health & Environment
Water Quality Control Division

EXPEDITED SETTLEMENT AGREEMENT

Number: ES-110404-3

The Colorado Department of Public Health and Environment ("Department"), through the Water Quality Control Division ("Division"), issues this Expedited Settlement Agreement ("ESA"), pursuant to the Division's authority under §§25-8-602, 25-8-605 and 25-8-608, C.R.S. of the Colorado Water Quality Control Act (the "Act") §§25-8-101 to 703, C.R.S., and its implementing regulations, with the express consent of Reynolds, Inc. ("Reynolds"). The Division and Reynolds may be referred to collectively as "the Parties."

1. Reynolds is a "person" as defined under the Water Quality Control Act, §25-8-103(13), C.R.S. and its implementing permit regulation, 5 CCR 1002-61, §61.2(73).
2. Reynolds, d/b/a Reynolds-Tierdael, was conducting construction activities associated with a sanitary sewer project located in or near the Town of Firestone, Weld County, Colorado (the "Project").
3. Reynolds failed to comply with the provisions of its Colorado Discharge Permit System General Permit for Stormwater Discharges Associated with Construction Activity (the "Permit"), Certification Number COR-03E135, as described in the attached inspection report (Attachment A).
4. The parties enter into this ESA in order to resolve the matter of civil penalties associated with the violation(s) alleged herein and in the attached inspection report for a penalty of \$10,500.00.
5. By accepting this ESA, Reynolds neither admits nor denies the violations or deficiencies specified herein and in the attached inspection report.
6. Reynolds certifies that all deficiencies identified in the attached inspection report have been corrected.
7. Reynolds agrees to the terms and conditions of this ESA. Reynolds agrees that this ESA constitutes a notice of alleged violation and an order issued pursuant to §§25-8-602, 25-8-605 and 25-8-608, C.R.S., and is an enforceable requirement of the Act. By signing the ESA, Reynolds waives: (1) the right to contest the finding(s) specified herein and in the attached inspection report; and (2) the opportunity for a public hearing pursuant to §25-8-603, C.R.S.
8. This ESA is subject to the Division's "Public Notification of Administrative Enforcement Actions Policy," which includes a thirty-day public comment period. The Division and Reynolds each reserve the right to withdraw consent to this ESA if comments received during the thirty-day period result in any proposed modification to the ESA.
9. This ESA constitutes a final agency order or action upon the date when the Executive Director or her designee signs the ESA and effectively imposes the civil penalty.

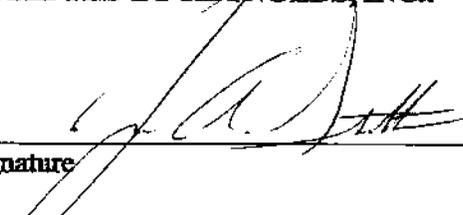
10. Reynolds agrees that within fifteen (15) calendar days of receiving the signed and final ESA from the Division, Reynolds shall submit a certified or cashier's check drawn to the order of the "Colorado Department of Public Health and Environment," for the amount specified in paragraph 4 above, to:

Michael Harris
Colorado Department of Public Health and Environment
Water Quality Control Division
Mail Code: WQCD-CAS-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

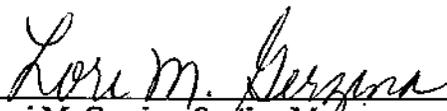
11. Notwithstanding paragraph 5 above, the violations described in this ESA will constitute part of Reynolds' compliance history for purposes where such history is relevant. This includes considering the violations described above in assessing a penalty for any subsequent violations against Reynolds. Reynolds agrees not to challenge the use of the cited violations for any such purpose.

12. This ESA, when final, is binding upon Reynolds and its corporate subsidiaries or parents, their officers, directors, successors in interest, and assigns. The undersigned warrant that they are authorized to legally bind their respective principals to this ESA.

ACCEPTED BY REYNOLDS, INC.:

	2/11/11
Signature	Date
JAMES A. STUTLER	VICE PRESIDENT
Name (printed)	Title

FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT:

	Date: April 4, 2011
Lori M. Gerzina, Section Manager Compliance Assurance Section WATER QUALITY CONTROL DIVISION	

Bill Ritter, Jr., Governor
James B. Martin, Executive Director

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Colorado Department
of Public Health
and Environment

March 30, 2009

James Stutler, Vice President
Reynolds Tierdael
1775 E. 69th Avenue
Denver, CO 80229

RE: Facility Inspection/Compliance Advisory
 E WCR 26 & Tri-Area Sanitary Trunk Line – Phase I
 CDPS Permit No. COR-03E135
 Weld County

Dear Mr. Stutler,

An inspection of the above-referenced facility was conducted on March 16, 2009 by PG Environmental, LLC, an authorized representative of the Water Quality Control Division (the Division). The inspection procedure consists of two parts: a review of records, and an on-site facility inspection. Findings associated with the inspection are detailed in the enclosed inspection report. The Division expects you to correct the findings noted in the enclosed inspection report and submit an explanation on how each finding was corrected. Pursuant to Part II.B.2 of the Colorado Discharge Permit System General Permit for Stormwater Discharges Associated with Construction Activity (the permit), you must submit the requested materials to the Colorado Department of Public Health and Environment, WQCD-P-B2, 4300 Cherry Creek Drive South, Denver, CO 80246-1530, Attn: Matt Czahor, by April 13, 2009.

This Compliance Advisory is intended to advise you of possible violations of the Colorado Water Quality Control Act, its implementing regulations and permits, so that you may take appropriate steps to avoid or mitigate formal enforcement action. This Compliance Advisory does not constitute a Notice of Violation or Cease and Desist Order and is not subject to appeal. However, the issuance of this Compliance Advisory does not limit or preclude the Division from pursuing its enforcement options. The Division is currently evaluating the facts and if a formal enforcement action is deemed necessary, you may be issued a Notice of Violation / Cease and Desist Order that may include the assessment of penalties.

If you have any questions, please call me at 303-692-3575.

Sincerely,

Matt Czahor
Environmental Protection Specialist
Permits Section
WATER QUALITY CONTROL DIVISION

Enclosures

cc: Matt Czahor, Water Quality Control Division
 Aaron Urdiales, EPA Region 8
 Local Health Department
 File Copy

Attachment A

Stormwater Inspection Report		
Permittee: Reynolds Tierdael	Cert. No. COR-03 E135	Date: 03/16/2009
Facility: E WCR 26 & Tri-Area Sanitary Trunk Line – Phase I	Industrial Type: Construction	Receiving Water: No Name Creek, Last Chance Ditch to St. Vrain Creek to South Platte River
Facility Address: Weld County Road 26 & Weld County Road 13; Weld County, Colorado		
Persons present: Trevor Barthen (Project Manager, Reynolds Tierdael); Mark Burrige (Superintendent, Reynolds Tierdael); Kurt Sittner (Senior Project Manager, Reynolds Tierdael)		
Facility Representative(s)/Title(s): Kurt Sittner (Senior Project Manager, Reynolds Tierdael)	Inspector(s): Jared Richardson (PG Environmental, LLC)	

Inspection Findings

The PG Inspector held a closing conference at the conclusion of the inspection. During the closing conference, the inspector reviewed the inspection findings with the Facility Representatives and instructed the representatives to correct all findings. Pursuant to all provisions of the Colorado Discharge Permit System General Permit for Stormwater Discharges Associated with Construction Activity (the permit), the findings listed below must be corrected.

Records Review

Note: The permit certification effective date was 08/05/2008. The date that construction started and land-disturbing activities began at the site was mid-August 2008 as provided by Mr. Trevor Barthen.

1. A copy of the Stormwater Management Plan (SWMP) was retained onsite. The SWMP was reviewed during the inspection and found to be inadequate for the following reasons:
 - a. The section in the SWMP on Site Description did not provide estimates of the total area of the site and the area and location expected to be disturbed by clearing, excavation, grading, or other construction activities as required by Part I.C.1.c of the permit. Specifically, the SWMP did not include the additional acreage to be disturbed as part of the second phase of construction. As provided by Mr. Trevor Barthen, an additional area of disturbance (~6 acres) associated with the second phase of construction was to be included under Certification No. COR03E135. The SWMP must be updated to include this information, and the permittee shall notify the Division (Permits Section) in writing of the change in planned total disturbance acreage as required by Part II.A.1 of the permit.
 - b. The Site Map did not clearly identify the construction site boundaries as required by Part I.C.2.a of the permit. Specifically, the Site Map identified temporary and permanent easements; however, it did not clearly identify the construction site boundaries in a legend or callout. The Site Map must be updated to clearly identify the construction site boundaries, and must reflect current facility conditions in the field.
 - c. The Site Map did not clearly identify all areas of ground surface disturbance as required by Part I.C.2.b of the permit. Specifically, the Site Map did not depict that disturbance areas on the south side of County Road 26 would be exposed at the time of inspection. The Site Map must be updated to identify all areas of soil disturbance, and must reflect current facility conditions in the field.
 - d. The Site Map did not adequately identify the location of all structural BMPs as required by Part I.C.2.f of the permit. Specifically, the Site Map did not clearly identify the location of all silt fence BMPs implemented onsite, and the location of straw bale BMPs implemented in various drainage channels. The Site Map must be updated to include this information, and must reflect current facility conditions in the field.
 - e. The Site Map did not adequately identify the location of all non-structural BMPs as required by Part I.C.2.g of

Attachment A

Inspection Report

(Reynolds Tierdael; E WCR 26 & Tri-Area Sanitary Trunk Line- Phase I)

Page 2 of 5

the permit. Specifically, the Site Map did not clearly identify the permanent seeding and mulching BMPs implemented on disturbed areas of the site. The Site Map must be updated to include this information, and must reflect current facility conditions in the field.

- f. The section in the SWMP on Stormwater Management Controls did not clearly describe and locate all *structural* site management practices or BMPs implemented at the facility that will minimize erosion and sediment transport as required by Part I.C.3.c.1 of the permit. For example, straw bales were implemented at the facility and not identified in the SWMP. The SWMP must be updated to include this information.
 - g. The section in the SWMP on Stormwater Management Controls did not clearly describe the installation and implementation specifications for each BMP identified in the SWMP as required by Part I.C.3.c of the permit. Specifically, silt fence and slope roughening were identified in the SWMP and implemented on-site but the SWMP did not contain a section with installation and implementation specifications for these BMPs. Additionally, straw bales were implemented on-site but the SWMP did not contain a section with installation and implementation specifications for this BMP. The SWMP must be updated to include this information.
 - h. The section in the SWMP on Final Stabilization and Long-term Stormwater Management did not include a description of the specific practices used to achieve final stabilization of all disturbed areas at the site (e.g., seeding mix and application methods, crimped straw, hydromulch, rolled erosion control products, etc.) and planned practices to control pollutants in stormwater discharges that will occur after construction operations have been completed, as required by Part I.C.4 of the permit. Specifically, the section in the SWMP on Final Stabilization and Long-term Stormwater Management did not clearly describe the interim stabilization practices and procedures associated with final stabilization of disturbed areas to be returned to operational control of the farmer and/or entity for agricultural use and cultivation. Furthermore, the SWMP referenced seeding and mulching practices for final stabilization to be in accordance with native seeding; however, this information was not included and maintained in the SWMP. The SWMP must be updated to include this information.
2. Inspection records were available and were reviewed during the inspection, but were found to be inadequate for the following reasons:
- a. Inspection records did not document the required inspection frequency specified in Part I.D.6.a of the permit. Inspections of the active site were conducted more than 14 days apart on numerous occasions. The gap between one of these inspections was 26 days with inspections documented on 08/20/08 and 09/15/08. The gap between a second inspection was 21 days with inspections documented on 09/15/08 and 10/6/08. Inspections must be conducted in accordance with Part I.D.6 of the permit.
 - b. It was observed during the course of the inspection that portions of the site had been completed and final stabilization practices implemented. A reduced inspection schedule is *only* allowed if Part I.D.6.a.2.iii of the permit is met; in that the SWMP must be amended to indicate those areas that will be inspected in accordance with the reduced inspection schedule. These SWMP modifications had not been made by the permittee. Inspections must be conducted in accordance with Part I.D.6 of the permit.
 - c. Inspections were not conducted as required in Part I.D.6.b of the permit. Specifically, the inspection record for 10/22/08 was not signed and therefore did not contain a signed statement indicating the site was in compliance. Additionally, the inspection record for 11/08/08 did not indicate that all BMPs implemented on-site had been inspected for proper operation and maintenance. Finally, the 11/26/08 inspection record notes that silt fence BMPs were in need of maintenance at Station 11+65 but did not include the minimum inspection documentation including a description and dates of corrective actions taken. Inspections must be documented in accordance with Part I.D.6.b of the permit.

Note: Inspections must be conducted at least once every 14 days and within 24 hours after the end of any precipitation or snowmelt event that causes surface erosion, except during winter snow pack conditions where melting does not exist, or when

Attachment A

all construction activities are completed. During winter snow pack conditions where melting does not exist, inspections do not need to be conducted; however, the dates when snow cover occurred, date when construction activities ceased, and date when melting conditions began must be documented for this exception. When all construction activities are completed but final stabilization has not been achieved due to a vegetative cover that has not become established, inspections must be conducted at least once a month and the SWMP must be amended to indicate those areas that will be inspected in accordance with this reduced schedule. For more detailed information on the required inspection frequency see Part I.D.6 of the permit.

Facility Inspection

Note: All Best Management Practices (BMPs) mentioned in the following findings must be selected, installed, implemented and maintained according to good engineering, hydrologic and pollution control practices outlined in the SWMP. These BMPs must be adequately designed to provide control for all potential pollutant sources associated with construction activity to prevent pollution or degradation of State waters.

3. It was observed during the inspection that adequate BMPs were not implemented and maintained to prevent the discharge of sediment to No Name Creek from disturbed slopes located between Manhole 17 and Manhole 18 in the southwestern portion of the site (see attached Photograph 1). Specifically, areas of disturbance and unconsolidated soils were observed beyond the silt fence BMPs located along the toe of the slope and directly adjacent to No Name Creek (see attached Photographs 1 and 2) and adequate BMPs were not implemented for the area of disturbance just north of the silt fence BMPs (see attached Photograph 3). As a result, there was a discharge of sediment from the areas of disturbance to No Name Creek (State waters). Adequate BMPs must be implemented and maintained to prevent the discharge of sediment from the areas of disturbance and disturbed slope areas located between Manhole 17 and Manhole 18 in the southwest portion of the site to No Name Creek (State waters) which subsequently drains to St. Vrain Creek (State waters), and the sediment discharged offsite must be removed and disposed of properly and the area remediated appropriately.
4. It was observed during the inspection that adequate BMPs were not implemented and maintained to prevent the discharge of sediment to Last Chance Ditch (State waters) from areas of disturbance located between Manhole 9 and Manhole 10 just east of County Road 13. Specifically, areas of disturbance and unconsolidated soils were observed beyond the silt fence BMPs located directly adjacent to Last Chance Ditch (see attached Photographs 4 and 5). As a result, there was a discharge of sediment from the areas of disturbance to Last Chance Ditch (State waters). Adequate BMPs must be implemented and maintained to prevent the discharge of sediment from the areas of disturbance located between Manhole 9 and Manhole 10 east of County Road 13 to Last Chance Ditch (State waters), which subsequently drains to St. Vrain Creek (State waters), and the sediment discharged offsite must be removed and disposed of properly and the area remediated appropriately.
5. It was observed during the inspection that adequate BMPs were not implemented to prevent the discharge of sediment from an area of disturbance located just east of County Road 13 near Manhole GH11 and an adjacent culvert pipe conveyance channel crossing (see attached Photograph 6). Specifically, no perimeter control BMPs were implemented for the area of disturbance adjacent to Manhole GH11 (see attached Photographs 6 through 8), and adequate BMPs were not implemented adjacent to the conveyance channel and culvert pipe crossing (see attached Photograph 9). As a result, there was a discharge of sediment from the areas of disturbance offsite to the south to an adjoining landowner property and conveyance channel (see attached Photographs 8 and 9). Adequate BMPs must be implemented to prevent the discharge of sediment from the areas of disturbance near Manhole GH11 offsite to the adjoining landowner's property and conveyance channel located to the south, and the sediment discharged offsite must be removed and disposed of properly.
6. It was observed during the inspection that adequate BMPs were not implemented in the drainage swale located at the northern portion of the project near the St. Vrain Sanitation District headworks entrance to prevent erosion due to runoff to the swale slopes from disturbed areas adjacent to the swale, and concentrated flow along the bottom of the swale (see attached Photographs 10 and 11). As a result, there was a potential for erosion and subsequent discharge to the

Attachment A

culvert pipe and conveyance channel ditch which subsequently discharges to St. Vrain Creek (State waters). Adequate BMPs must be implemented in this area to prevent the discharge of sediment from the drainage swale and adjacent areas of disturbance.

7. It was observed during the inspection that adequate BMPs were not implemented to prevent the discharge of sediment and debris from the access roadway located north of County Road 26 at the northern portion of the project (see attached Photographs 13 and 14). Specifically, the roadway itself was not stabilized and no perimeter control BMPs were implemented along the western side of the access road adjacent to the conveyance ditch (see attached Photographs 13 and 14). Additionally, small sediment and debris spoil piles were located on the west side of the access road directly adjacent to the conveyance ditch (see attached Photographs 13 and 14). As a result, there was a potential for the discharge of sediment from the access roadway to the adjacent conveyance ditch and subsequent St. Vrain Creek (State waters). Adequate BMPs must be implemented to prevent the discharge of sediment and debris from the roadway.
8. It was observed during the inspection that adequate BMPs were not implemented adjacent to or in the drainage swales located east of County Road 13 between Manhole 8 and Manhole 9 to prevent erosion due to run-on to the swale slopes from areas of disturbance adjacent to the swales, and concentrated flow along the bottom of the swales (see attached Photographs 15 through 17). Specifically, no BMPs or stabilization practices were implemented on the areas of disturbance adjacent to the drainage swales and the drainage swales themselves were unstabilized (see attached Photograph 15). As a result, there was a potential for erosion and subsequent discharge of sediment to the drainage swales and offsite. Adequate BMPs must be implemented in this area to prevent the discharge of sediment from the drainage swale and adjacent areas of disturbance.
9. It was observed during the inspection that adequate BMPs were not implemented to prevent erosion and the discharge of sediment for a disturbed slope area located between Manhole 12 and Manhole 17 (see attached Photograph 18). BMPs were not implemented to prevent water run-on to the slope and the surface of the slope was not stabilized. As a result, there was a potential for the discharge of sediment from the disturbed slope area. Adequate BMPs must be implemented and correctly installed to prevent the discharge of sediment from the disturbed slope area.
10. It was observed during the inspection that BMPs were not adequately implemented, inspected and maintained for silt fence BMPs adjacent to access road at northern portion of site were collapsed, not attached to the stake, and deteriorated (see attached Photograph 19). Additionally, silt fence was installed backwards and not in accordance with specifications and design criteria meeting best engineering practice requirements adjacent to the soil stockpile located east of County Road 13 between Highway 119 and County Road 26 (see attached Photograph 20). Furthermore, the silt fence was collapsed, torn, and not properly entrenched in the ground to retain sediment between Manhole 12 and Manhole 17 (see attached Photographs 21 through 23). As a result, there was a potential for the discharge of sediment from these locations. All BMPs implemented on the site must be properly implemented and inspected and maintained in good and effective operating condition.
11. It was observed during the inspection that BMPs were not adequately inspected and maintained for temporary and permanent stabilization practices implemented between Manhole 7 and Manhole 8. Specifically, large areas previously seeded and mulched were barren and unmaintained (see attached Photographs 24 and 25). As a result, there was a potential for the discharge of sediment from this location to the adjacent County Road 13 drainage conveyance channel. All BMPs implemented on the site must be inspected and maintained in good and effective operating condition.
12. It was observed during the inspection that adequate BMPs were not implemented to prevent the discharge of sediment from a large soil stockpile located near Manhole 12 west of County Road 13 behind several private homes and between Highway 119 and County Road 26 (see attached Photograph 26). As provided by Mr. Kurt Sittner (Sr. Project Manager, Reynolds Tierdael), soil material (sediment) from construction activities had been placed on the soil stockpile via an agreement with the adjacent landowner, who owns the tract of land encompassing the soil stockpile. Mr. Sittner was not aware of whether this was a formal written agreement and a copy of the agreement was not available at the time of inspection. A copy of the agreement between Reynolds Tierdael and the landowner detailing the terms and conditions for the placement of soil material from construction activities associated with Certification No. COR-03

Attachment A

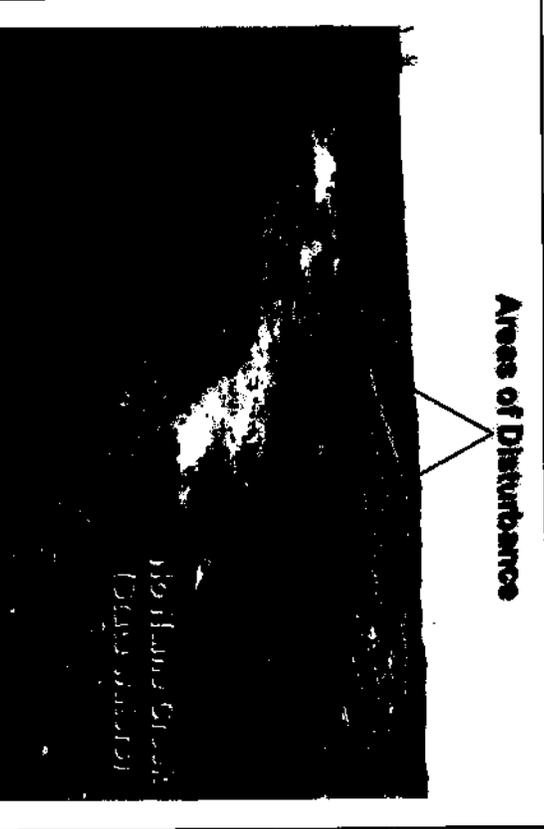
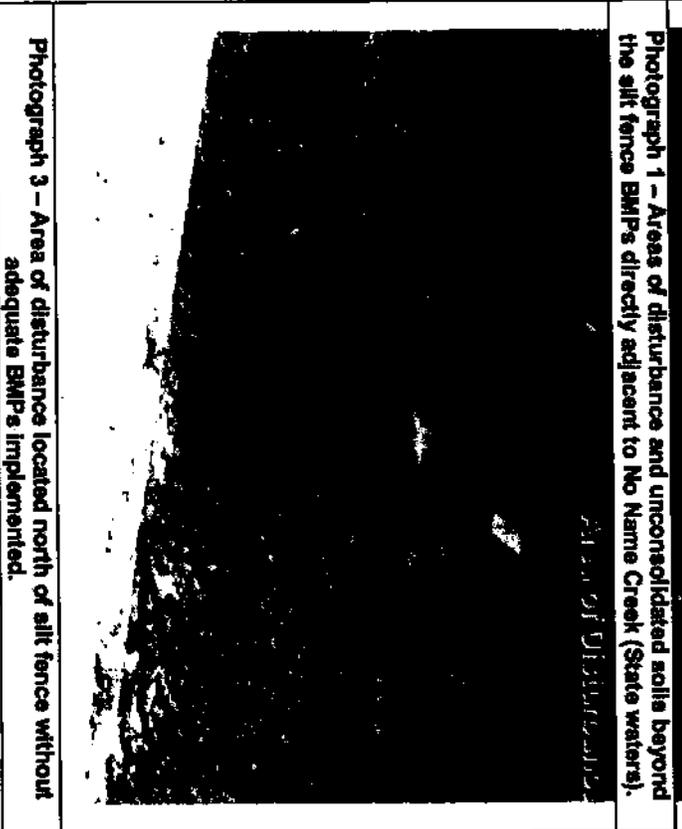
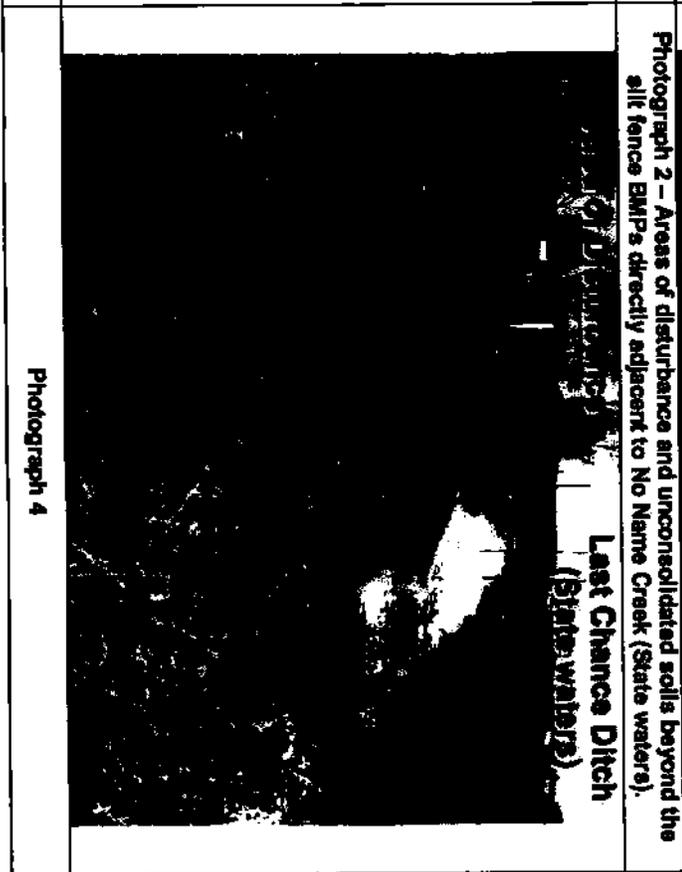
Inspection Report
(Reynolds Tierdael; E WCR 26 & Tri-Area Sanitary Trunk Line- Phase I)

E135 to this soil stockpile must be submitted to the Division.

Site Photographs

Reynolds Tierdæl
 E WCR 26 & Tri-Area Sanitary Trunk Line-
 Phase I
 Weld County, Colorado

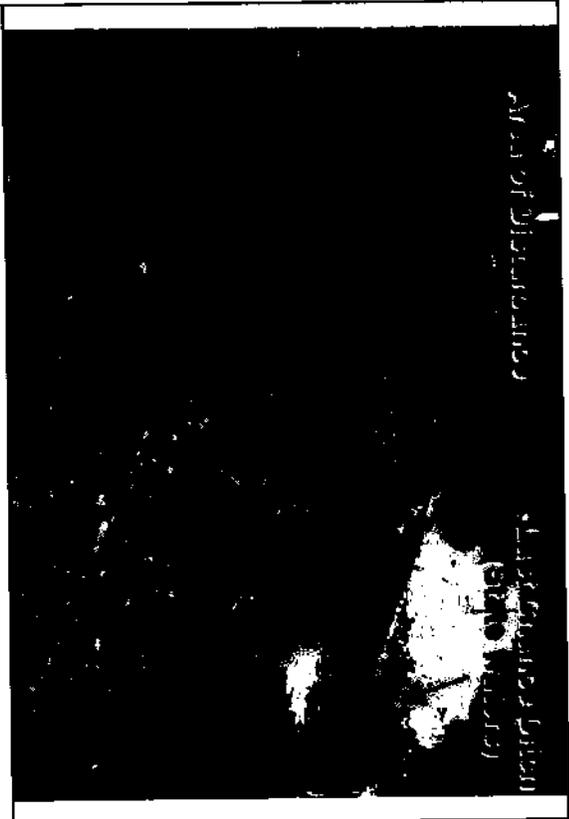
Photograph date: 03/16/2009

 <p style="text-align: center;">Areas of Disturbance</p> <p style="text-align: center;">No Name Creek (State waters)</p> <p>Photograph 1 – Areas of disturbance and unconsolidated soils beyond the silt fence BMPs directly adjacent to No Name Creek (State waters).</p>	 <p style="text-align: center;">Areas of Disturbance</p> <p style="text-align: center;">No Name Creek (State waters)</p> <p>Photograph 2 – Areas of disturbance and unconsolidated soils beyond the silt fence BMPs directly adjacent to No Name Creek (State waters).</p>
 <p style="text-align: center;">Areas of Disturbance</p> <p>Photograph 3 – Area of disturbance located north of silt fence without adequate BMPs implemented.</p>	 <p style="text-align: center;">Areas of Disturbance</p> <p style="text-align: center;">Last Chance Ditch (State waters)</p> <p>Photograph 4</p>

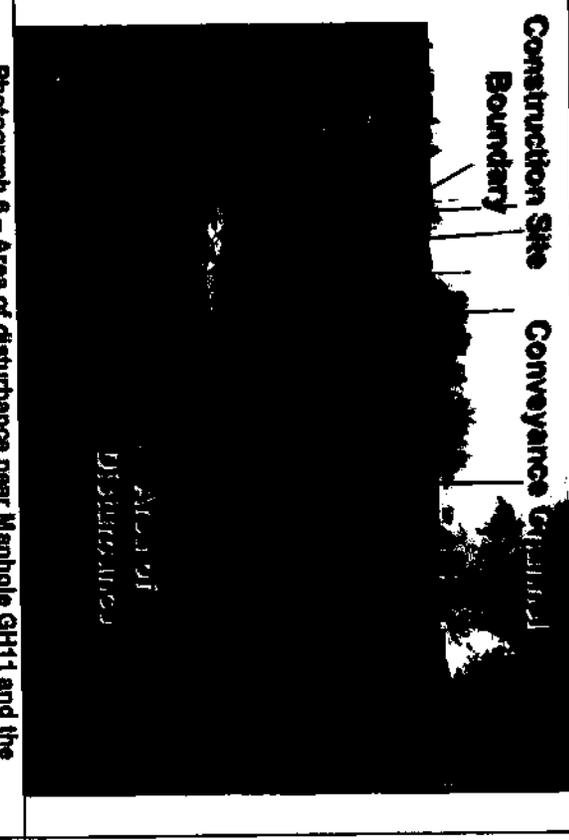
Site Photographs

Reynolds Tierdahl
 E WCR 26 & Tri-Area Sanitary Trunk Line-
 Phase I
 Weld County, Colorado

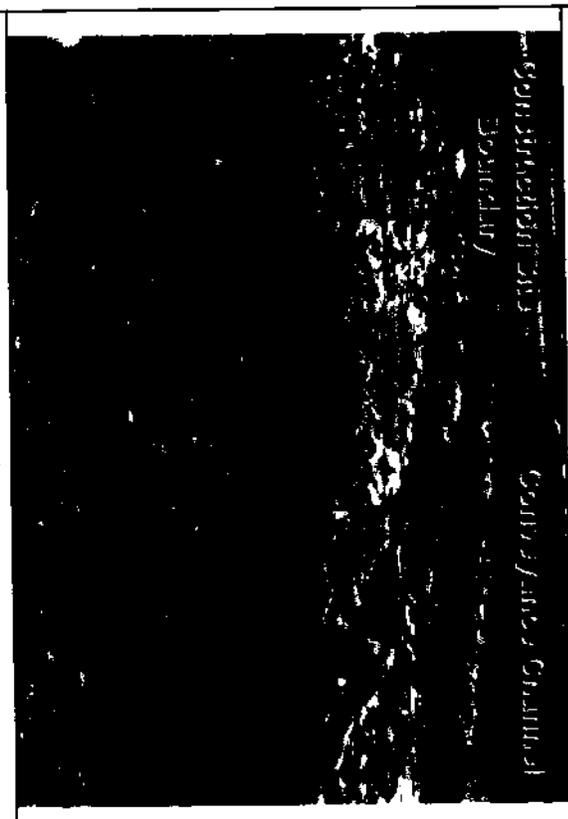
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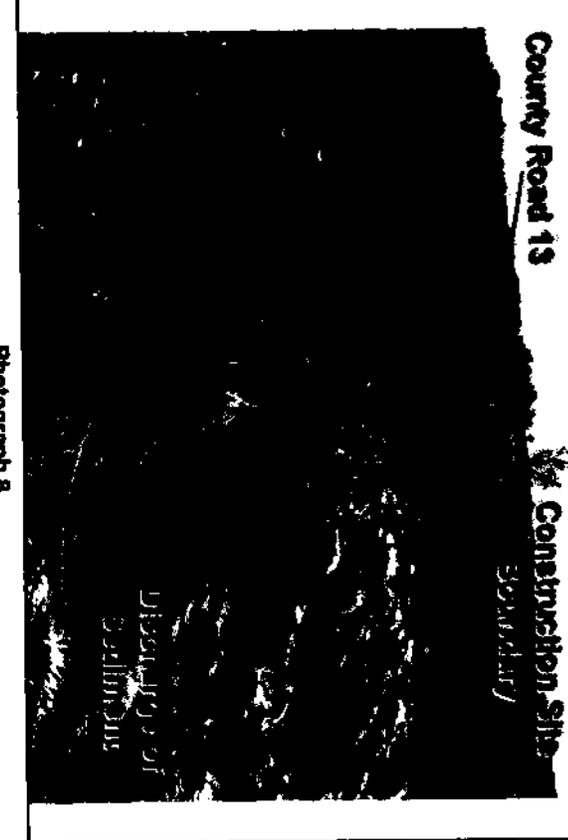
Photograph 5



Photograph 6 - Area of disturbance near Manhole GH11 and the construction site boundary and conveyance channel to the south.



Photograph 7



Photograph 8

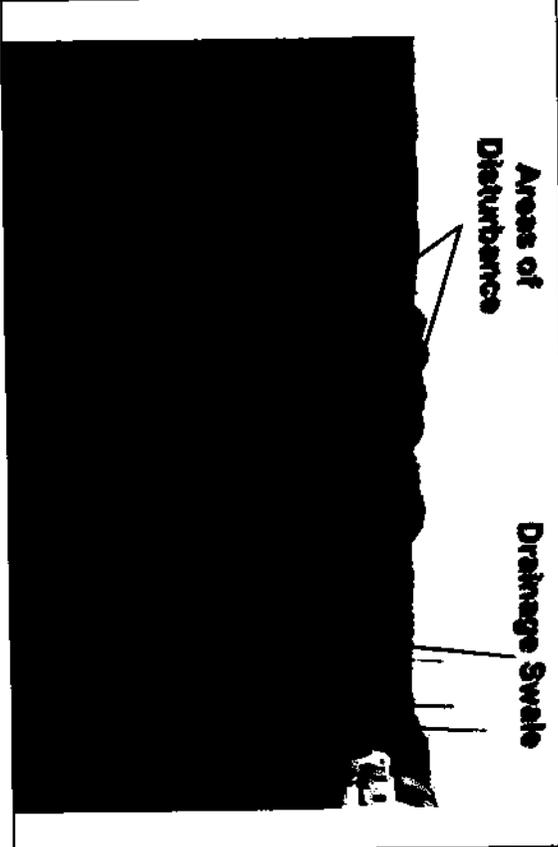
Site Photographs

Reynolds Tierdahl
 E WCR 26 & Tri-Area Sanitary Trunk Line-
 Phase I
 Weld County, Colorado

Photograph date: 03/16/2009



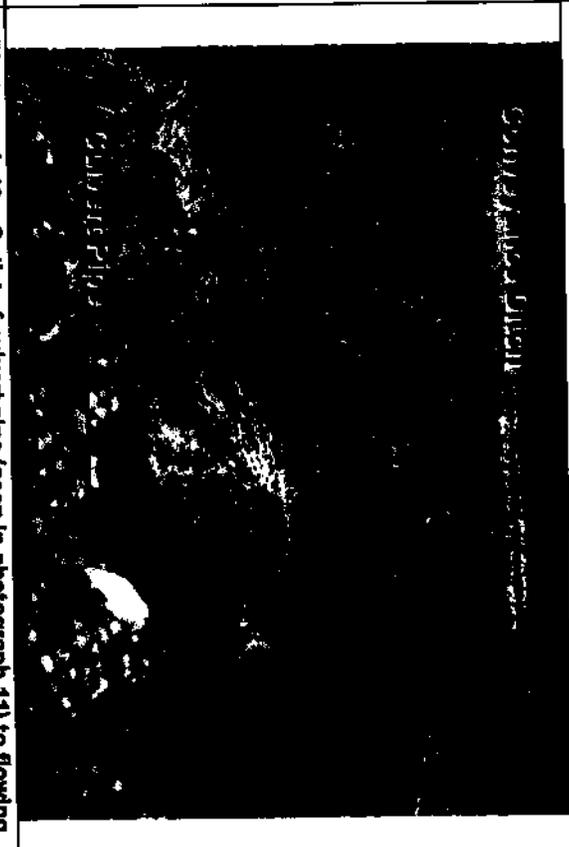
Photograph 9 - Inadequate BMPs at the culvert pipe conveyance channel crossing and evidence of a discharge of sediment offsite to the



Photograph 10

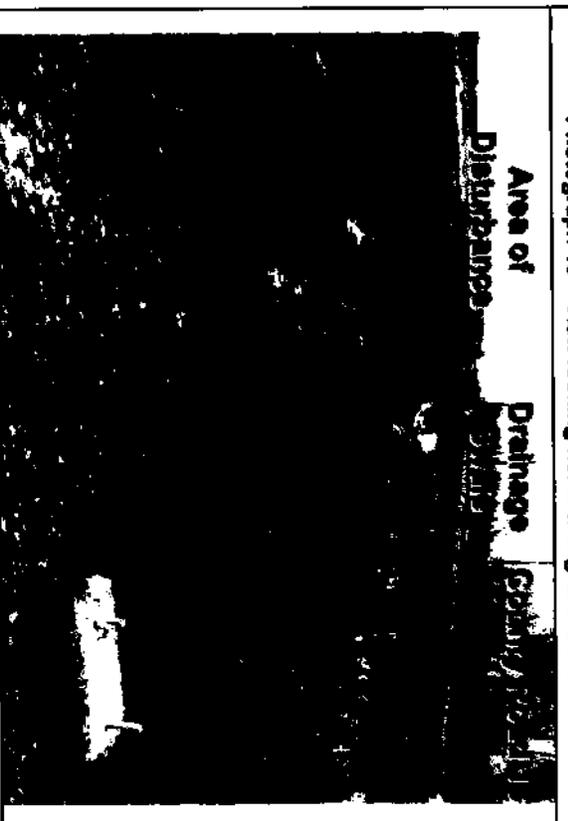
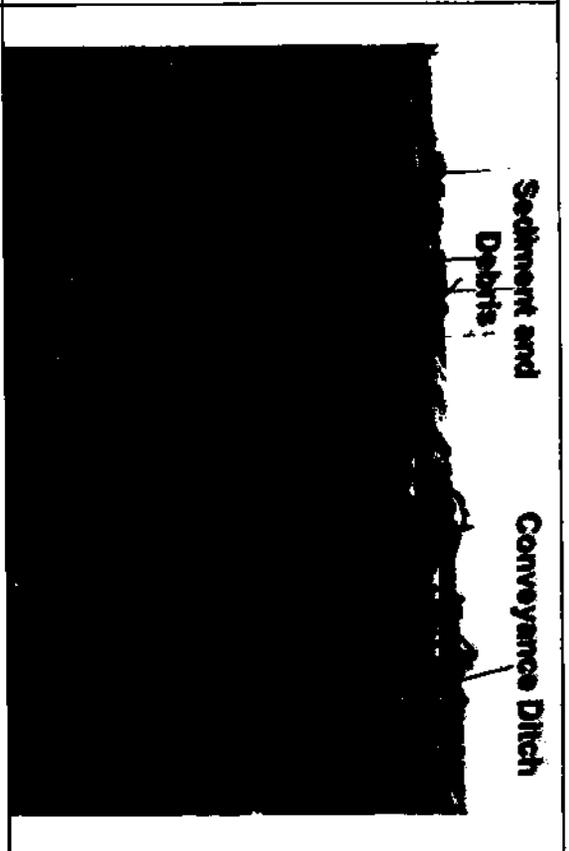
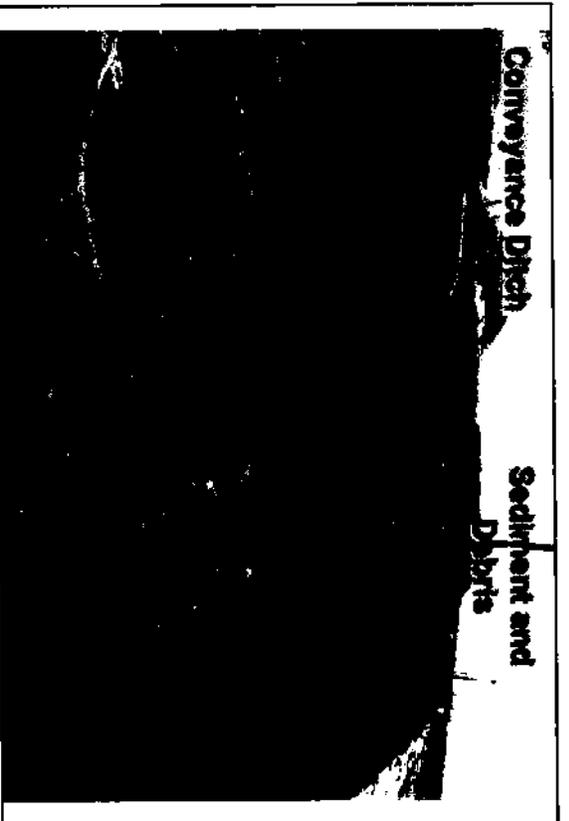


Photograph 11 - Unstabilized areas of disturbance and drainage swales with culvert pipe inlet.



Photograph 12 - Outlet of culvert pipe (seen in photograph 11) to flowing conveyance ditch

<p>Site Photographs</p>	<p>Reynolds Tierdael E WCR 26 & Tri-Area Sanitary Trunk Line- Phase I Weld County, Colorado</p>	<p>Photograph date: 03/16/2009</p>
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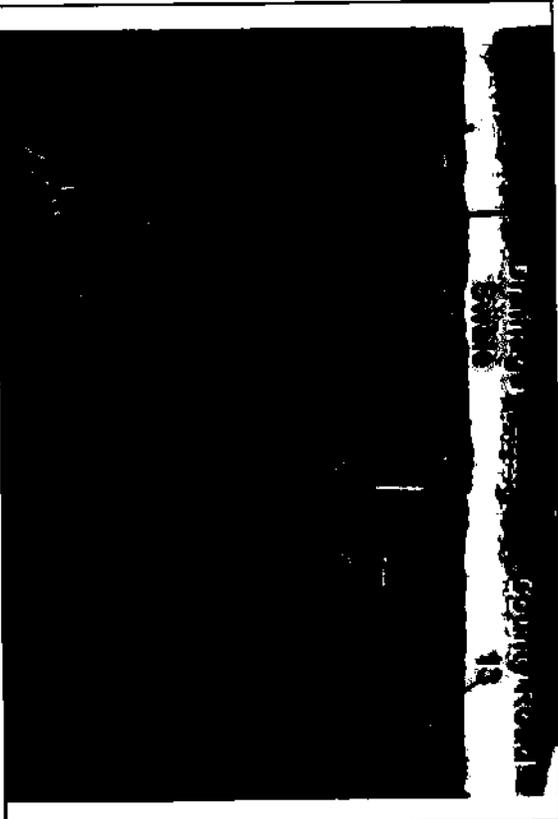
Photograph 15 - Adequate BMPs or stabilization practices not implemented for area of disturbance and adjacent drainage swale.

Photograph 16 - Adequate BMPs not implemented to prevent the discharge of sediment to the drainage swale.

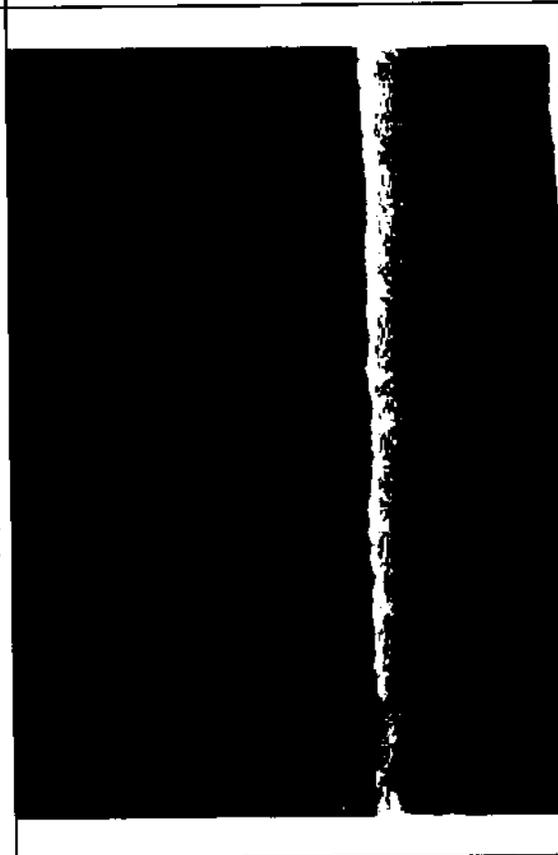
Site Photographs

Reynolds Tierdahl
 E WCR 26 & Tri-Area Sanitary Trunk Line-
 Phase I
 Weld County, Colorado

Photograph date: 03/18/2009



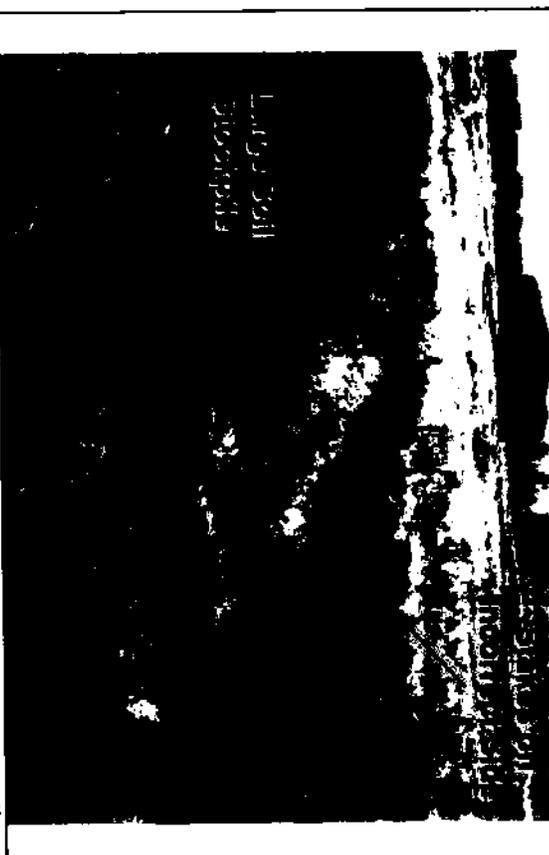
Photograph 17



Photograph 18 - Unstabilized slope area.



Photograph 19 - Silt fence BMPs collapsed, not attached to the stakes and deteriorated.

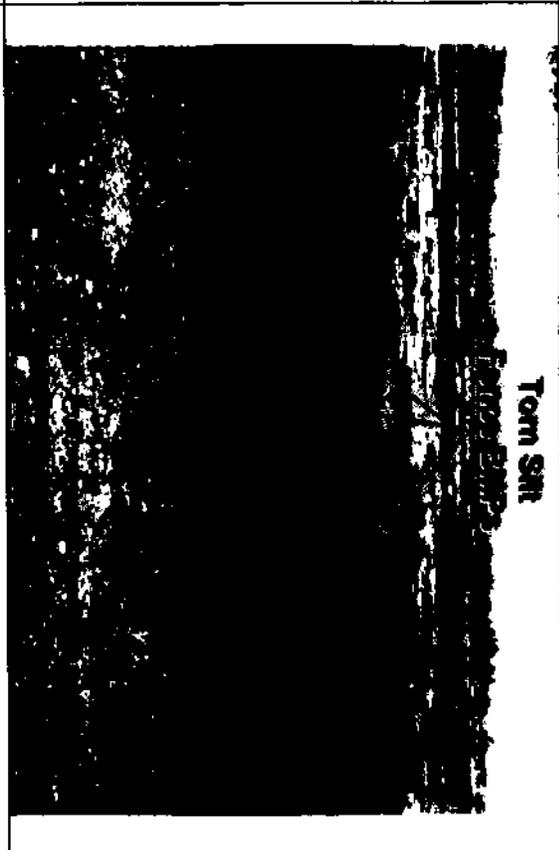


Photograph 20 - Silt fence BMPs installed backwards adjacent to soil stockpile.

<p>Site Photographs</p>	<p>Reynolds Tierdahl E WCR 26 & Tr/Area Sanitary Trunk Line- Phase I Weld County, Colorado</p>	<p>Photograph date: 03/16/2009</p>
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Photograph 21 – Collapsed silt fence BMPs.

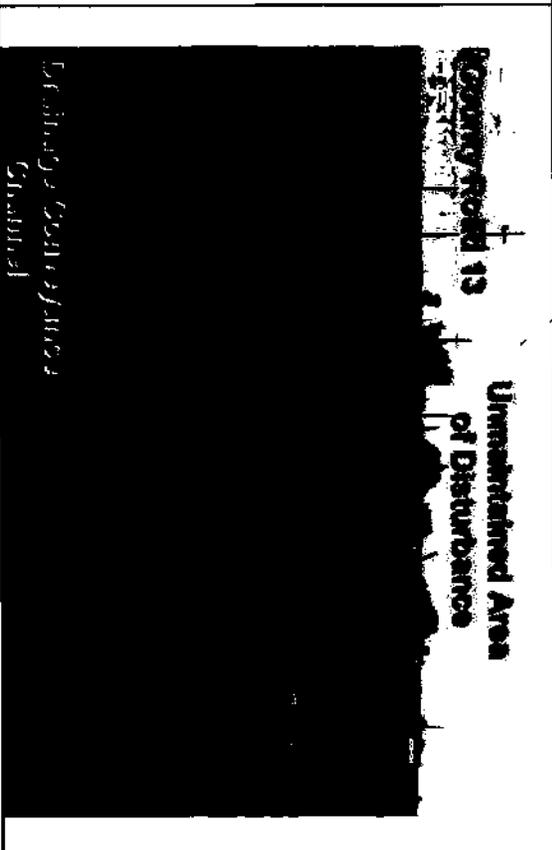


Photograph 22 – Torn and deteriorated silt fence BMPs.



Not Entrenched Silt
Fence BMPs

Photograph 23 – Silt fence BMPs not properly entrenched to retain sediment.



Unmaintained Seeding
Grass

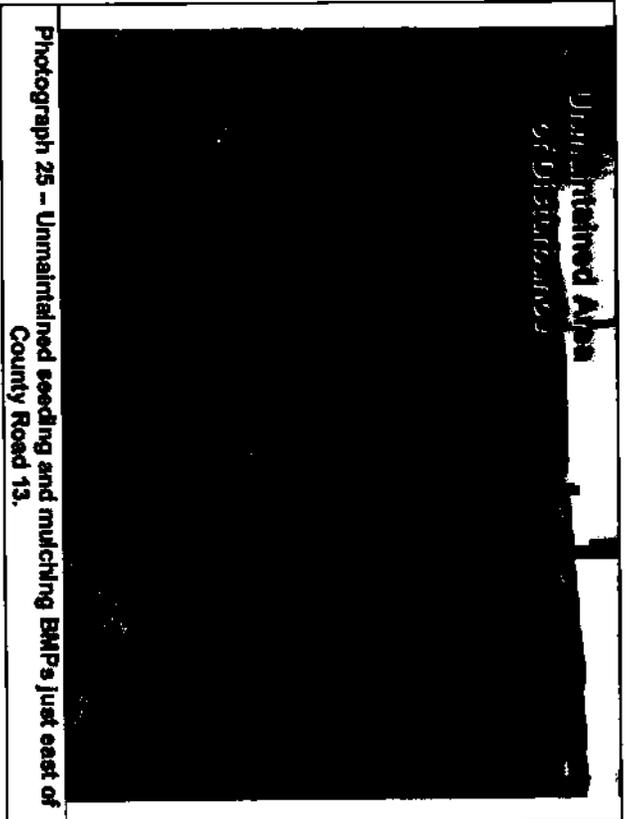
Unmaintained Area
of Disturbance

Photograph 24 – Unmaintained seeding and mulching BMPs just east of County Road 13.

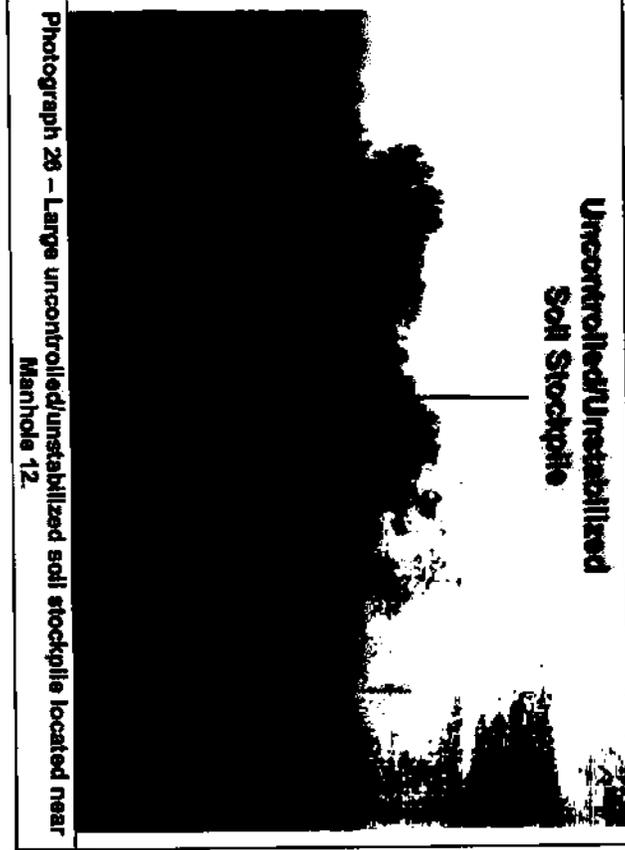
Site Photographs

Reynolds Tierdale
 E WCR 26 & Tri-Area Sanitary Trunk Line-
 Phase I
 Weld County, Colorado

Photograph date: 03/16/2009



Photograph 25 - Unmaintained seeding and mulching BMPs just east of County Road 13.



Photograph 26 - Large uncontrolled/unstabilized soil stockpile located near Manhole 12.