



COLORADO
Department of Public
Health & Environment

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

September 9, 2016

Kenneth B. Milyard, President
Western Constructors Inc
401 Kokopelli Blvd., #1, Suite 200
Fruita, CO 81521

Certified Mail Number: 7005 1820 0000 3208 7250

RE: Expedited Settlement Agreement, Number ES-160908-1
Dove Hill Estates Ph II / CDPS Permit Certification No. COR03N464

Dear Mr. Milyard:

Enclosed for your records is Western Constructors 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 paragraph 10 of the enclosed ESA, Western Constructors Inc must, within 15 calendar days, submit a certified or cashier's check for the amount specified in paragraph 4 of the ESA to the Water Quality Control Division to resolve this matter.

If you have any questions, please do not hesitate to contact me at 303-692-2271 or lindsay.ellis@state.co.us.

Sincerely,

Lindsay Ellis, Enforcement Specialist
Clean Water Enforcement Unit
WATER QUALITY CONTROL DIVISION

cc: Enforcement File

ec: Michael Boeglin, EPA Region VIII
Trevor Jiricek, Weld County Department of Public Health & Environment
Barry Schaeffer, Town of LaSalle
Aimee Konowal, Watershed Section, CDPHE
Corrina Quintana, Grants and Loans, CDPHE
Doug Camrud, Engineering Section, CDPHE
Kelly Jacques, Field Services Section, CDPHE
Lillian Gonzalez, Permits Section, CDPHE
Mike Harris, Clean Water Enforcement Unit, CDPHE
Tania Watson, Data Management, CDPHE
Nathan Moore, Clean Water Compliance Unit, CDPHE
Megan Shirley, Clean Water Compliance Unit, CDPHE





COLORADO

Department of Public Health & Environment

WATER QUALITY CONTROL DIVISION

EXPEDITED SETTLEMENT AGREEMENT

Number: ES-160908-1

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 (“Act”) §§25-8-101 to 803, C.R.S., and its implementing regulations, with the express consent of Western Constructors, Inc. (“Western”). The Division and Western may be referred to collectively as “the Parties.”

1. Western 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. Western is conducting single-family residential construction activities in the Town of LaSalle, Weld County, Colorado (“Project”).
3. Western failed to comply with the provisions of its Colorado Discharge Permit System General Permit for Stormwater Discharges Associated with Construction Activity (“Permit”), Certification Number COR03N464.
4. The parties enter into this ESA in order to resolve the matter of civil penalties associated with the violations alleged herein and in the attached inspection report for a penalty of \$13,750.00.
5. By accepting this ESA, Western neither admits nor denies the violations or deficiencies specified herein and in the attached inspection report.
6. Western certifies that all deficiencies identified in the attached inspection report were corrected and the Project is compliant with all terms and conditions of the Permit. Additionally, Western attaches to this ESA: (1) a written description detailing how the deficiencies were corrected, including a description of each control measure implemented at the Project; and (2) photographs documenting current conditions and control measures implemented at the Project.
7. Western agrees to the terms and conditions of this ESA. Western 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, Western waives: (1) the right to contest the violations 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 on Administrative Enforcement Actions Policy,” which includes a thirty-day public comment period. The Division and Western 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.



COLORADO

Department of Public
Health & Environment

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

June 5, 2015

CERTIFIED NO: 7012- 2920- 0000- 4116- 4085

Kenneth Milyard, Pres
Western Constructors Inc
401 Kokopellis Blvd Ste 1 200
Fruita, CO 81521

bruce@westernconstructors.com

Re: Facility Inspection / Compliance Advisory
Western Constructors Inc — Dove Hill Estates Phase II
CDPS Permit No. COR03N464

Mr. Milyard:

An inspection of the above-referenced facility was conducted by the Water Quality Control Division (the division) on April 28, 2015. The inspection procedure consisted of two parts, a review of records and an on-site facility inspection. Findings identified during the inspection are detailed in the enclosed inspection report.

This correspondence documents:

1. The division's expectations for correcting the inspection findings.
2. The division's determination on whether the findings meet established criteria for formal enforcement.
3. If the division requires a response to the inspection report.

Corrective Action

All discharges authorized by the Colorado Discharge Permit System (CDPS) General Permit for Stormwater Discharges Associated with Construction Activity (COR030000) (the permit) must be consistent with all requirements, and terms and conditions of the permit. Therefore, the division expects Western Constructors Inc (the permittee) to correct all findings identified in the enclosed inspection report and return the facility to compliance with the permit. A violation of the terms and conditions specified in this permit may be subject to civil and criminal liability pursuant to sections 25-8-601 through 612, C.R.S.. Correcting a permit violation does not remove the original violation.



Compliance Determination

The division evaluated the inspection findings against the division's Stormwater Enforcement Response Guide and has determined that the findings identified in the enclosed inspection report meet the criteria for a formal enforcement response. The following discussion provides the division's expectation for the inspected entity's response to the inspection report, and information regarding response adequacy and future division communication.

- a. Consistent with section 61.8(3) of 5 CCR 1002-61 (Regulation No. 61) and Part II.B.2 of the CDPS General Permit for Stormwater Discharges Associated with Construction Activity, the inspected entity must submit a response to the Division that documents the corrective action(s) implemented for each finding identified in the enclosed inspection report. Unless specifically requested by the Division, the inspected entity is not required to submit a copy of the revised Stormwater Management Plan with the response.
- b. Also consistent with section 61.8(3) of 5 CCR 1002-61 (Regulation No. 61) and Part II.B.2 of the CDPS General Permit for Stormwater Discharges Associated with Construction Activity, the inspected entity must submit to the division any previous versions of the Stormwater Management Plan that are believed to provide information that is noted as missing or inadequate in this inspection report.
- c. The inspected entity is encouraged to provide any additional information they feel should be considered by the division with respect to any finding identified in the enclosed inspection report. The division will evaluate this information, and may modify the Compliance Determination if the information demonstrates the finding was not accurate. For any finding for which the inspected entity disagrees with a division observation of the adequacy of a control measure based on site-specific pollutant removal capability or capacity to provide retention or detention of flows, the response should contain relevant site-specific information to demonstrate compliance with Part I.D.2. This information may include, but is not limited to, volume of control measures, drainage area, expected stormwater flows and volumes based on soil types and land use, retention time, and the expected pollutant concentrations in discharge based on the design.

The inspected entity must submit the response and additional requested information to the Colorado Department of Public Health and Environment, WQCD-P-B2, 4300 Cherry Creek Drive South, Denver, CO 80246-1530, Attn: Megan Shirley, by COB June 22, 2015. Per the signatory requirements in Part I.F.1, the response shall be signed and certified for accuracy by the permittee in a cover letter containing the paragraph below:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for



submitting false information, including the possibility of fine and imprisonment for knowing violations.”

- d. Following receipt and review of the inspected entity’s response (as identified in a. above), the division will identify whether all inspection findings were adequately addressed and whether there is, or is not, evidence of continuing noncompliance and potential for continued penalty liability for ongoing violations. The division intends to communicate this determination, in writing, within 30 days following the receipt of an inspected entity’s response, or will provide a revised schedule if additional time is required to complete the division evaluation. If the division determines the inspection findings have not been adequately addressed, the division response will provide notification of the continued noncompliance and the need for corrective action.
- e. The division’s standard enforcement response process includes the issuance of a Notice of Violation/Cease and Desist Order. The division has an internal time control goal of 180 days to issue a formal enforcement action for identified noncompliance meeting the established criteria for formal enforcement. If the division determines that it will not meet its internal time control goal, the division will provide written notification to the permittee within 180 days of the date of the inspection. If, at any time, the division determines that it will forego a formal enforcement response for the identified noncompliance, the division will provide written notification to the permittee at the time that decision is made.

This Compliance Advisory is intended to advise Western Constructors Inc of potential violations of the Colorado Water Quality Control Act, its implementing regulations and permits so that appropriate steps can be taken to avoid or mitigate formal enforcement action or to correct our records (if applicable). This Compliance Advisory does not constitute a Notice of Violation or Cease and Desist Order and is not subject to appeal. The issuance of this Compliance Advisory does not limit or preclude the Division from pursuing its enforcement options concerning the potential violation(s). The Division will evaluate the facts associated with the potential violation(s) 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 303-692-6421.

Regards,



Megan Shirley
Environmental Protection Specialist
Clean Water Compliance Unit
WATER QUALITY CONTROL DIVISION

cc: Barry Schaffer, City of LaSalle
File Copy



Stormwater Inspection Report

Permittee: Western Constructors Inc	Report Date: June 5, 2015
Legally Responsible Person: Kenneth Milyard	Cert#: COR03N464
Facility: Dove Hill Estates Phase II	Title: Pres
Address: Dove Hill Rd and Sunset Dr, 80645	Receiving Water: Lower Lathan Drain - South Platte River
Persons Present: Dudley Biddle/Western Constructors	MS4/County: LaSalle
Inspector: Megan Shirley	
Inspection Began: 4/28/15 9:30 AM	Inspection Completed: 4/28/15 12:15 PM

Inspection Findings

The Water Quality Control Division (division) inspector held a closing conference at the conclusion of the inspection, during which the inspector reviewed all alleged inspection findings with the facility representative. The inspector communicated the division's expectation that the facility representative initiate corrective actions, immediately, for all alleged inspection findings, in accordance with the provisions of the CDPS General Permit for Stormwater Discharges Associated with Construction Activity (the permit).

RECORDS REVIEW

- Note 1: In a communication with the permittee prior to the inspection, the division inspector requested an additional copy of the Stormwater Management Plan (SWMP), supporting documents and inspection records be provided to division personnel at the inspection. The copy of the SWMP, supporting documents and inspection records were provided to the division inspector on May 1, 2015, three days after the inspection.
- Note 2: The permit certification effective date was March 10, 2015. The date that construction started and land-disturbing activities began at the site was March 1, 2013 and the area of disturbance at the time of the inspection was 7.5 acres as provided by Dudley Biddle/Supt.
- Note 3: The division notified Western Constructors of the failure to obtain permit coverage with a formal compliance advisory on February 13, 2015. Rik Gay, with the division, discussed permitting and compliance expectations with Dudley Biddle at the project site on February 4, 2015.

1. In accordance with the Colorado Water Quality Control Act (Act) and the Colorado Discharge Permit System Regulations 5-CCR 1002-61, CDPS discharge permit coverage is required for stormwater discharges from construction activities to surface waters of the State. Specifically, construction activities that disturb one acre or greater, or are part of a larger common plan of development disturbing one acre or greater, require either a discharge permit or an R-Factor waiver. Failure to obtain either a permit or waiver prior to commencement of construction activities is a violation of the Act

subject to potential civil or criminal penalties. Permit application is required at least ten calendar days prior to the commencement of construction activities.

2. A copy of the SWMP was retained onsite. The division inspector reviewed the SWMP and found it to be inadequate for the following reasons:
 - a) The Site Description section did not adequately describe items listed below as required by Part I.C.1 of the permit. Specifically,
 - i. Information was not provided in the SWMP to describe what the construction activity is at this site (e.g. single-family residential).
 - ii. Information was not provided to describe the phases of construction activities (e.g. grading, utilities, curb/gutter, vertical construction, final landscaping, etc.).
 - iii. The SWMP did not identify the total acreage of the project and the acreage expected to be disturbed by construction activities.
 - iv. The type of vegetation existing prior to construction and the percent vegetative density were not described in the SWMP.
 - v. The SWMP did not describe pollutants at the site. Pollutants observed during the inspection include but are not limited to sediment, concrete, asphalt, construction materials, fuels, hydraulic fluids, paints and sealants, etc.
 - vi. Concrete washout to the ground was observed onsite during the inspection but was not identified in the SWMP.
 - vii. The SWMP does not discuss the receiving waters onsite (including the City of LaSalle MS4 and the ultimate receiving waters of this discharge).

The SWMP shall clearly describe the construction activity, and include:

- The nature of the construction activity
- The proposed sequence of major activities
- The estimate of the total acreage of the site and the acreage of disturbance
- The pre-existing vegetation at the site and the pre-construction vegetation density
- All potential pollutant sources were not identified and
- Anticipated sources of allowable non-stormwater discharge at the site
- The name of the MS4 and the name of the receiving waters

The division expects the permittee to update the Site Description section of the SWMP to include all items required by the permit.

- b) The Site Map section of the SWMP did not identify items listed below as required by Part I.C.2 of the permit. Specifically,

- i. The site map did not identify the location of all equipment staging or construction materials stored onsite.

The SWMP shall include a legible site map(s), showing the entire site and identify:

- o The areas used for storage of building materials and equipment staging

The division expects the permittee to update the Site Map to include all items required by the permit.

- c) The Stormwater Management Controls section did not identify control measures listed below as required by Part I.C.3 of the permit. Specifically,

- i. Information is not provided in the SWMP to identify who the SWMP administrator is.
- ii. Information was not provided to discuss structural controls onsite and to identify what pollutants they would be used for managing.
- iii. Information was not provided in the SWMP to identify the relationship between major phases of construction and control measures (e.g. perimeter control are installed for grading activities, concrete washout is installed for curb and gutter work, etc.)
- iv. The SWMP did not discuss how materials were managed to prevent exposure to or contamination of stormwater.
- v. Spill procedures and responses were not identified in the SWMP.
- vi. Information was not provided in the SWMP to discuss how vehicle tracking would be managed (e.g. vehicle tracking pads, sweeping, etc.).
- vii. Information was not provided to discuss how wastes would be managed onsite (this includes portable toilets, construction trash and debris, and concrete washout material).

The description of the stormwater management controls in the SWMP shall include at a minimum:

- o The position/title or individual responsible for implementing and maintaining the SWMP
- o All structural erosion and sediment control measures implemented at the site
- o The relationship between the phases of construction and the implementation / maintenance of both structural and non-structural control measures
- o All practices implemented at the site to minimize impacts from procedures or significant materials that have the potential to contribute pollutants to stormwater runoff
- o Spill prevention and response procedures for areas where potential spills can occur
- o All practices implemented at the site to control potential discharges from vehicle tracking
- o All practices implemented at the site to control stormwater pollution from all construction site wastes

The division expects the permittee to update the Stormwater Management Controls section to include all items as required by the permit.

- d) The Stormwater Management Controls section did not adequately describe the installation and implementation specifications for items observed during the field inspection and listed below as required by Part I.C.3.c of the permit. Specifically, details were not provided for the sand bags used as curb checks. These controls are not in accordance with good engineering, hydrologic, or pollution control practices.

The SWMP shall clearly describe the installation and implementation specifications for all control measures used to control pollutants in stormwater discharges at the site.

The division expects the permittee to update the stormwater management controls to include all items as required by the permit.

- e) The Final Stabilization and Long-term Stormwater Management section did not describe items required by Part I.C.4 of the permit. Specifically, plans were not provided to demonstrate how final stabilization will be achieved at each lot.

The SWMP shall clearly describe the practices used to achieve final stabilization of all disturbed areas at the site and any planned practices to control pollutants in stormwater discharges that will occur after construction operations have been completed at the site.

The division expects the permittee to update the final stabilization and long-term stormwater management section to include all items as required by the permit.

- 3. Inspection records were available for review during the inspection. Upon review, the inspection records were found to be inadequate.

Inspection records from March 20, 2015 through April 28, 2015 were reviewed by the inspector.

- a) The Inspection and Maintenance section did not describe inspection and maintenance procedures as required by Part I.C.5 of the permit. Specifically,
 - i. Information was not provided to describe the scope of inspections.
 - ii. Information was not provided to describe maintenance requirements for managing controls in effective operating condition.

The SWMP shall clearly describe the inspection and maintenance procedures implemented at the site to maintain all erosion and sediment control measures in good and effective operating procedures. The division expects the permittee to update the inspection and maintenance section to include all items as required by the permit.

- b) Inspections were not conducted consistent with minimum schedules required by Part I.D.6.a of the permit. Specifically, an inspection was conducted on 03/20/15 and a subsequent inspection was not conducted until 04/10/15, 21 days later.

The permit requires at a minimum, inspections must be conducted at least once every 14 calendar days. Post-storm inspections must be conducted within 24 hours after the end of any precipitation event that causes surface erosion. At sites where construction activity is complete but final stabilization has not been achieved, inspections must be conducted at least monthly. The division expects the permittee to conduct inspections within the timeframes required by the permit.

- c) Inspections were not performed and/or documented as required by Part I.D.6.b of the permit. Specifically, the title of the inspector is not included on the inspection reports.

The permittee shall keep a record of inspections. Inspection reports must identify any incidents of non-compliance with the terms and conditions of this permit. At a minimum, the inspection report must include:

- o Name(s) and **title(s)** of personnel making the inspection.
- d) Maintenance of control measures was not performed and/or documented as required by Part I.D.8 of the permit. Specifically,
- i. The inspection on 04/10/15 does not contain a signed compliance statement, indicating that the corrective actions have not yet been completed at the time of this inspection (04/28/15), 18 days after they were identified.

The permit requires that:

- o Where site inspections note the need for maintenance or replacement, control measures must be maintained in accordance with the SWMP and Part I.D.7 of the permit. Control measures that are not adequately maintained in accordance with good engineering, hydrologic and pollution control practices, including removal of collected sediment outside the acceptable tolerances of the control measure, are considered to be no longer operating effectively.
- o Repair, replacement, or installation of new control measures determined necessary during site inspections to address ineffective or inadequate control measures must be conducted in accordance with Part I.D.8 of the permit. Control measures considered to no longer be operating effectively resulting in noncompliance with the permit must be addressed as soon as possible, immediately in most cases, to minimize the discharge of pollutants.
- o SWMP updates required as a result of deficiencies in the SWMP noted during site inspections shall be made in accordance with Part I.D.5.c of the permit.

The division expects the permittee to maintain control measures in accordance with good engineering, hydrologic and pollution control practices, within the prescribed timeframe, as required by the permit.

SITE INSPECTION

Note 4: As required by Part I.D.2 of the permit all control measures mentioned in the following findings must be:

- Selected, installed, implemented and maintained according to good engineering, hydrologic and pollution control practices.
- Consistent with the installation and implementation specifications identified in the SWMP.
- Designed to provide control for all potential pollutant sources associated with the construction activity and to prevent pollution or degradation of state waters.

Note 5: The findings identified below provide specific observations of field deficiencies. It remains the permittee's responsibility to ensure that all permit requirements, terms and conditions are met for the entire construction site.

Note 6: The use of inlet protection control measures is to provide a "polishing" treatment system for sediment that bypasses other adequate up-gradient control measures which are designed to function as part of an overall treatment train. Inlet protection alone is not an adequate control measure for managing sediment from tracking or sediment from disturbed areas.

1. It was noted during the inspection that control measures were not implemented to manage pollutant contributions to stormwater runoff from sediment from disturbed areas located on paved roadways throughout the project site as follows:
 - a. Along Sunset Drive (refer to photograph(s) 01, 06).
 - b. Along Dove Hill Road (refer to photograph(s) 02-05, 07-09).
- Control Measure Observation: Control measures were not implemented to control stormwater runoff from the locations and pollutant source noted above. Specifically,
 - Sediment tracking was observed along the paved street and significant amounts of sediment had accumulated within the curb flowlines.
 - Hauling activities were observed during the inspection on and off of disturbed areas without tracking controls.
 - Egress points along the above described locations were observed during the inspection without tracking controls.
- Control Measure Finding: An installation and implementation specification for a vehicle tracking pad was provided in the SWMP, but was not implemented. Specifically,
 - Vehicle tracking controls had not been installed as required by the SWMP and permit.
- Stormwater runoff from this area is discharged as follows: Surface runoff from the above locations flows into the associated inlets along the roadway and into the Town of LaSalle MS4. Additional inadequate control measures were implemented down gradient of this location (refer to finding 7 and 9, and to note 6).

- Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Implement control measures consistent with the installation and implementation specifications provided in the SWMP.
 - Practices must be implemented for all areas of potential vehicle tracking, and can include: minimizing site access; street sweeping or scraping; tracking pads; graveled parking areas; requiring that vehicles stay on paved areas on-site; wash racks; contractor education; and/or sediment control measures, etc.

2. It was noted during the inspection that inadequate control measures were implemented to manage pollutant contributions to stormwater from sediment from disturbed areas located along the perimeter of disturbed lots between the lot and the sidewalk/pavement as follows:

- a. On the east boundary of Sunset Drive (refer to photograph(s) 14-21).
 - b. On the west boundary of Sunset Drive (refer to photograph(s) 22).
 - c. On the south boundary of Sunset Drive (refer to photograph(s) 10).
 - d. On the southern intersection of Sunset Drive and the future West Union Ave, near the office trailer location (refer to photograph(s) 11-13).
 - e. Northwest of the intersection of Sunset Drive and Dove Hill Road behind the disturbed lots between construction activities and the existing wetland (refer to photograph(s) 23-24).
 - f. On the north boundary of Dove Hill Road (refer to photograph(s) 25-27).
 - g. On the south boundary of Dove Hill Road (refer to photograph(s) 28).
- Control Measure Observation: A straw wattle control measure was implemented to manage stormwater runoff from the locations and pollutant source noted above, however the control measure was inadequate. Specifically,
 - The straw wattles observed during the inspection were not consistently installed per the specification provided in the SWMP.
 - The wattles were not correctly entrenched, staked, or abutted/overlapped to prevent bypass of sediment laden stormwater.
 - Straw wattles were observed along the above described locations to be in need of maintenance to repair or replace damaged sections that had tears or holes.
 - Maintenance was needed to remove accumulated sediment from the up-gradient sides of the wattles.

- Maintenance was needed to remove accumulated sediment from the down-gradient sides of the wattle. This sediment resulted from stormwater bypassing the control measure from failure to install it as required, as stated above.
 - Control Measure Finding: An installation and implementation specification for straw wattle was provided in the SWMP, but was not consistently implemented. Specifically,
 - Per the specification provided in the SWMP, wattles shall be entrenched two inches into the soil and backfilled. Stakes shall be embedded to a minimum depth of 12 inches at two foot intervals. Wattles shall be tightly abutted with no gaps.
 - Two wooden stakes shall be installed at all straw wattle ends or joints, stakes should be approximately 90 degrees to one another.
 - Straw wattles shall be maintained to prevent sediment from passing over or under the wattles.
 - Damaged straw wattles shall be replaced or repaired and accumulated sediment removed to maintain functionality of the control measure at its intended capacity.
 - Stormwater runoff from this area is discharged as follows:
 - i. Surface runoff from locations a-d, f, and g above flows to the associated storm sewer inlets and into the Town of LaSalle MS4. Additional inadequate control measures were implemented down gradient of this location (refer to finding 7 and 9).
 - ii. Surface runoff from location e flows generally north and west to the existing wetland directly behind the Dove Hill Residential development which drains to the Lower Lathan Drain and ultimately to the South Platte River. Additional control measures were not implemented down gradient of this location.
 - Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
 - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Maintain all erosion and sediment control practices and other protective practices in good and effective operating condition.
 - Implement control measures consistent with the installation and implementation specifications provided in the SWMP.
3. It was noted during the inspection that control measures were not implemented to manage pollutant contributions to stormwater from sediment from disturbed areas located as follows:
- a. On the east side of Sunset Drive (refer to photograph(s) 41).
 - b. At the intersection of Sunset Drive and S 8th Street (refer to photograph(s) 42-45).
 - c. On the west side of Sunset Drive (refer to photograph(s) 46).

- d. At the intersection of Sunset Drive and Dove Hill Road (refer to photograph(s) 47-48).
 - e. On the north side of Dove Hill Road (refer to photograph(s) 49-52).
 - f. On the south side of Dove Hill Road (refer to photograph(s) 53).
- Control Measure Observation: Control measures were not implemented to control stormwater runoff from the locations and pollutant source noted above. Specifically,
 - Several lots in the above described locations were observed during the inspection to be without control measures implemented to manage sediment from the disturbed areas.
 - Control Measure Finding: Control measures were not implemented to manage stormwater runoff from the above listed pollutant source as required by the permit.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from locations a-f listed above flows to the associated storm sewer inlets to the Town of LaSalle MS4. Additional inadequate control measures were implemented down gradient of this location (refer to note 6).
 - Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
 - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.
 - Control measures implemented at the site must be adequately designed to provide control for all potential pollutant sources associated with construction activity to prevent pollution or degradation of State waters.
 - Design control measures following good engineering, hydrologic and pollution control practices to prevent pollution or degradation of state waters and document in the SWMP.
4. It was noted during the inspection that inadequate control measures were implemented to manage stormwater runoff from concrete waste located as follows:
- a. On the lot at the intersection of Sunset Drive and S 8th Street (refer to photograph(s) 29).
 - b. On the south side of Dove Hill Rd, towards the west portion of the development (refer to photograph(s) 30).
- Control Measure Observation: A concrete washout area control measure was implemented to manage stormwater runoff from the location and pollutant source noted above; however the control measure was inadequate. Specifically,
 - Concrete waste was observed deposited on the ground and not properly disposed of as required in the SWMP.
 - Control Measure Finding: An installation and implementation specification for a concrete washout area was provided in the SWMP, but was not consistently implemented.

- As required in the SWMP, concrete washout and waste are to be disposed of at the designated concrete washout area.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from locations a and b listed above flows to the associated storm sewer that is part of the Town of LaSalle MS4. Additional inadequate control measures were implemented down gradient of this location (refer to finding 7 and 9). Note that the control measures implemented in the referenced findings are designed to promote settling and filter sediment and suspended solids. These controls are not adequate to manage the dissolved pollutants associated with concrete washouts and wastes.
 - Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
 - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.
 - The discharge of concrete washout waste must not leave the site as surface runoff or to surface waters.
 - All site wastes must be properly managed to prevent potential pollution of state waters. This permit does not authorize on-site waste disposal.
5. It was noted during the inspection that control measures were not implemented to manage stormwater runoff from sediment from disturbed areas located on the north side of Dove Hill Road (refer to photograph(s) 31-32).
- Control Measure Observation: The SWMP identified a surface roughening control measure for the location and pollutant source noted above, however the control measure had not been implemented. Specifically,
 - The SWMP requires that areas that are disturbed without active construction activities be surface roughened. Surface roughening was not observed during the inspection.
 - Control Measure Finding: An installation and implementation specification for surface roughening was provided in the SWMP, but was not implemented. Specifically,
 - Per the specification provided in the SWMP, the contractor shall roughen the surface or provide either temporary or permanent ground cover within (14) days of exposing the area if it will remain with grading operations for 14 days or more.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from this location flows south to the associated storm sewer system of the Town of LaSalle MS4, or flows directly north of the development to an existing wetland area which drains to the Lower Lathan Drain and ultimately to the South Platte River.. Additional inadequate control measures were implemented down gradient of this location (refer to finding 6, 7, and 9).
 - Result: There was a potential discharge of pollutants to the following state water(s): South Platte River

- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Facilities must implement the provisions of the SWMP as written and updated, from commencement of construction activity until final stabilization is complete, as a condition of this permit.
 - Implement control measures consistent with the installation and implementation specifications provided in the SWMP.

- 6. It was noted during the inspection that inadequate control measures were implemented to manage pollutant contributions to stormwater from sediment from disturbed areas located on the north side of Dove Hill Road, at the front and back of disturbed lots (refer to photograph(s) 55-72).

- Control Measure Observation: A silt fence control measure was implemented to manage stormwater runoff from the location and pollutant source noted above, however the control measure was inadequate. Specifically,
 - Silt fence observed during the inspection was not consistently installed as required by the specification in the SWMP.
 - The fence was not entrenched and backfilled.
 - The geotextile was observed to be sagging as it was not securely stapled to the posts. The joints of the fence were not wrapped per the specification provided.
 - Maintenance was needed to repair holes and tears in the geotextile.
 - Several locations of fence need to be replaced or reinstalled to prevent potential bypass of untreated stormwater.
 - Maintenance was needed to remove accumulated sediment against the silt fence. Sediment resulting from wind erosion on the down gradient side of the silt fence also needs to be removed.

- Control Measure Finding: An installation and implementation specification for silt fence was provided in the SWMP, but was not consistently implemented. Specifically,
 - Per the specification provided in the SWMP, geotextile shall be buried a minimum of four inches and backfilled and compacted. Stakes shall be installed 12 inches into the ground. The geotextile is to be secured to the stakes with three or more staples per post.
 - Silt fence joints and end sections shall be installed using two posts surrounded in geotextile fabric for one full turn. Joints shall be tightly abutted with no gaps to prevent potential flow-through of sediment.
 - Silt fence should be repaired or replaced when signs of tearing, sagging, or wear are observed.

- Sediment accumulated upstream of the silt fence shall be removed as needed to maintain the functionality of the control measure, typically when depth of accumulated sediment is approximately six inches.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from this location flows south to the associated storm sewer system of the Town of LaSalle MS4, or flows directly north of the development to an existing wetland area which drains to the Lower Lathan Drain and ultimately to the South Platte River. Additional control measures were not implemented down gradient of this location.
 - Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
 - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Maintain all erosion and sediment control practices and other protective practices in good and effective operating condition.
 - Implement control measures consistent with the installation and implementation specifications provided in the SWMP.
7. It was noted during the inspection that inadequate control measures were implemented to manage pollutant contributions to stormwater from sediment from disturbed areas located as follows:
- a. On the east side of Sunset Drive (refer to photograph(s) 73-74).
 - b. On the north side of Dove Hill Drive (refer to photograph(s) 75).
 - c. On the south side of Dove Hill Drive (refer to photograph(s) 76).
- Control Measure Observation: A sand bag used as a curb check control measure was implemented to manage stormwater runoff from the locations and pollutant source noted above, however the control measure was inadequate. Specifically,
 - Sand bags used as sediment control measures are not in accordance with good engineering, hydrologic, or pollution control practices. The practice is not equivalent to adequately installed curb socks and similar control measures specified for the use in that they do not prevent bypass, do not provide similar retention of pollutants, and can become pollutant sources.
 - The sand bags observed during the inspection were in need of maintenance to remove accumulated sediment on the up gradient side of the curb check.
 - Several of the sand bags were damaged from vehicles and other equipment running over and parking on the curb checks. This creates an additional pollutant source (sand) with inadequate control measures implemented.
- Control Measure Finding: An installation and implementation specification for sand bags used as curb checks observed in the field during the inspection was not provided in the SWMP as required by the permit. Specifically,

- The sand bags are not in accordance with good engineering, hydrologic, or pollution control practices. The bags result in ponding of stormwater rather than flow-through filtration. The bags do not provide adequate capacity to facilitate an acceptable retention time for settling.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from locations a-c above flow to the associated storm sewer inlets that are part of the Town of LaSalle MS4. Additional inadequate control measures were implemented down gradient of this location (refer to finding 9).
 - Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
 - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Maintain all erosion and sediment control practices and other protective practices in good and effective operating condition.
 - Facilities must select, install, implement, and maintain appropriate control measures, following good engineering, hydrologic and pollution control practices.
 - Control measures implemented at the site must be adequately designed to provide control for all potential pollutant sources associated with construction activity to prevent pollution or degradation of State waters.
 - Design control measures following good engineering, hydrologic and pollution control practices to prevent pollution or degradation of state waters and document in the SWMP.
8. It was noted during the inspection that control measures were not implemented to manage pollutant contributions to stormwater from construction materials located on the lots at the intersection of Sunset Drive and S 8th Street, and Dove Hill Road and Sunset Drive (refer to photograph(s) 33-34).
- Control Measure Observation: Control measures were not implemented to control stormwater runoff from the location and pollutant source noted above. Specifically,
 - Control measures were not observed to manage construction materials onsite. Materials observed during the inspection include fuels, sealants, adhesives, etc.
 - Control Measure Finding: Control measures were not implemented to manage stormwater runoff from the above listed pollutant source as required by the permit.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from the above locations flows to the associated storm sewer inlets to the Town of LaSalle MS4. Additional inadequate control measures were implemented down gradient of this location (refer to finding 9). Note that the control measures implemented in the referenced finding are designed to filter sediment and suspended solids. These controls are not adequate to manage the dissolved pollutants associated with construction materials.
 - Result: There was a potential discharge of pollutants to the following state water(s): South Platte River

- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.
 - All site wastes must be properly managed to prevent potential pollution of state waters. This permit does not authorize on-site waste disposal.
 - Design control measures following good engineering, hydrologic and pollution control practices to prevent pollution or degradation of state waters and document in the SWMP.
9. It was noted during the inspection that inadequate control measures were implemented to manage pollutant contributions to stormwater from sediment from disturbed areas located on the east and west sides of Sunset Road (refer to photograph(s) 35-37).
- Control Measure Observation: An inlet protection bag and rock sock control measure were implemented to manage stormwater runoff from the locations and pollutant source noted above, however the control measure was inadequate. Specifically,
 - Maintenance was needed to remove accumulated sediment and debris from the rock socks and inlet bags.
 - Control Measure Finding: An installation and implementation specification for rock socks and inlet bag inlet protection control measures was provided in the SWMP, but was not consistently implemented. Specifically,
 - Sediment accumulated upstream of inlet protection shall be removed as necessary to maintain effectiveness of the control measure, typically when storage volume reaches 50 percent of the capacity of the control.
 - Stormwater runoff from this area is discharged as follows: Surface runoff from these locations flows into the associated inlets to the Town of LaSalle MS4. Additional control measures were not implemented down gradient of this location.
 - Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
 - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Maintain all erosion and sediment control practices and other protective practices in good and effective operating condition.
10. It was noted during the inspection that inadequate control measures were implemented to manage pollutant contributions to stormwater from concrete washout located at the concrete washout area on the south side of the site (refer to photograph(s) 38).

- Control Measure Observation: A concrete washout area control measure was implemented to manage stormwater runoff from the location and pollutant source noted above, however the control measure was inadequate. Specifically,
 - The concrete washout was not installed per the specification. The earthen berms were not consistently compacted nor did they meet a uniform height and width installation.
- Control Measure Finding: An installation and implementation specification for a concrete washout area was provided in the SWMP, but was not consistently implemented. Specifically,
 - The specification for concrete washout areas provided in the SWMP requires compacted earthen berms to create the containment area of the washout. Berms are to be compacted and measure at minimum two feet high, by four feet wide, by 15 feet in length.
- Stormwater runoff from this area is discharged as follows: Surface runoff from this location flows south of the site to the adjacent irrigation ditch, Union Ditch (as indicated by the site map). Additional control measures were not implemented down gradient of this location.
- Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - The discharge of concrete washout waste must not leave the site as surface runoff or to surface waters.
 - Implement control measures consistent with the installation and implementation specifications provided in the SWMP.

11. It was noted during the inspection that inadequate control measures were implemented to manage pollutant contributions to stormwater from sediment from stockpiles located on the south side of the site (refer to photograph(s) 79-84).

- Control Measure Observation: A silt fence control measure was implemented to manage stormwater runoff from the location and pollutant source noted above, however the control measure was inadequate. Specifically,
 - Silt fence installed down gradient of the soil stockpiles between the piles and the ditch were in need of significant maintenance and re-installation.
 - Several sections of fence were completely torn down. Other locations needed to be re-staked or entrenched and backfilled per the specification.
- Control Measure Finding: An installation and implementation specification for silt fence was provided in the SWMP, but was not consistently implemented. Specifically,
 - Per the specification provided in the SWMP, geotextile shall be buried a minimum of four inches and backfilled and compacted. Stakes shall be installed 12 inches into the ground. The geotextile is to be secured to the stakes with three or more staples per post.

- Silt fence joints and end sections shall be installed using two posts surrounded in geotextile fabric for one full turn. Joints shall be tightly abutted with no gaps to prevent potential flow-through of sediment.
- Silt fence should be repaired or replaced when signs of tearing, sagging, or wear are observed.
- Silt fence used at the toe of the slope shall be placed one to ten feet beyond the toe of the slope to provide storage capacity.
- Stormwater runoff from this area is discharged as follows: Surface runoff from this location flows south of the site to the adjacent ditch, Union Ditch as identified on the site map. Additional control measures were not implemented down gradient of this location.
- Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Maintain all erosion and sediment control practices and other protective practices in good and effective operating condition.
 - Control measures implemented at the site must be adequately designed to provide control for all potential pollutant sources associated with construction activity to prevent pollution or degradation of State waters.
 - Implement control measures consistent with the installation and implementation specifications provided in the SWMP.

12. It was noted during the inspection that control measures were not implemented to manage pollutant contributions to stormwater from sediment from stockpiles located on the south side of the site (refer to photograph(s) 77-78).

- Control Measure Observation: Control measures were not implemented to control stormwater runoff from the location and pollutant source noted above. Specifically,
 - Controls were not implemented along the newly staged soil stockpile location.
- Control Measure Finding: An installation and implementation specification for stockpile management was provided in the SWMP, but was not implemented. Specifically,
 - The SWMP requires that all perimeter sediment and erosion controls devices be installed prior to commencing any earth clearing or grading activities.
 - Silt fence shall be installed and maintained throughout construction.
 - Silt fence used at the toe of the slope shall be placed one to ten feet beyond the toe of the slope to provide storage capacity.

- Stormwater runoff from this area is discharged as follows: Surface runoff from this location flows directly south to the adjacent ditch, Union Ditch (as identified on the site map). Additional control measures were not implemented down gradient of this location.
- Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Facilities must implement the provisions of the SWMP as written and updated, from commencement of construction activity until final stabilization is complete, as a condition of this permit.
 - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.

13. It was noted during the inspection that inadequate control measures were implemented to manage pollutant contributions to stormwater from sediment from stockpiles located on the north side of the soil stockpile staging area (refer to photograph(s) 85-88).

- Control Measure Observation: A straw wattle control measure was implemented to manage stormwater runoff from the location and pollutant source noted above, however the control measure was inadequate. Specifically,
 - The straw wattles were not installed as required by the specification provided in the SWMP. The wattles were not trenched in or staked properly.
 - Several locations of straw wattles were observed to be in need of maintenance to repair or replace damaged sections that had tears or holes.
 - Maintenance was needed to remove accumulated sediment from the up-gradient sides of the wattles.
- Control Measure Finding: An installation and implementation specification for straw wattle was provided in the SWMP, but was not consistently implemented. Specifically,
 - Wattles shall be placed five to ten feet beyond the toe of the slope to provide storage capacity. Wattles shall be placed on the contour with ends flared up slope.
 - Per the specification provided in the SWMP, wattles shall be entrenched two inches into the soil and backfilled. Stakes shall be embedded to a minimum depth of 12 inches at two foot intervals. Wattles shall be tightly abutted with no gaps.
 - Two wooden stakes shall be installed at all straw wattle ends or joints, stakes should be approximately 90 degrees to one another.
 - Straw wattles shall be maintained to prevent sediment from passing over or under the wattles.

- Damaged straw wattles shall be replaced or repaired and accumulated sediment removed to maintain functionality of the control measure at its intended capacity.
- Stormwater runoff from this area is discharged as follows: Surface runoff from this location flows north into the project site. Discharges flow to the Town of LaSalle MS4 inlets on Sunset Drive. Additional inadequate control measures were implemented down gradient of this location (refer to finding 2, 7, and 9).
- Result: There was a potential discharge of pollutants to the following state water(s): South Platte River
- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
 - Maintain all erosion and sediment control practices and other protective practices in good and effective operating condition.
 - Control measures implemented at the site must be adequately designed to provide control for all potential pollutant sources associated with construction activity to prevent pollution or degradation of State waters.
 - Implement control measures consistent with the installation and implementation specifications provided in the SWMP.



Photograph 1: Tracking from staging area on the south side of site onto Sunset Drive



Photograph 2: Sediment in curblines along Dove Hill Road



Photograph 3: Sediment in curblin along Dove Hill Road



Photograph 4: Sediment in curblin along Dove Hill Road



Photograph 5: Sediment in curblines along Dove Hill Road



Photograph 6: Sediment in curblines along Sunset Drive



Photograph 7: Tracking off of disturbed site onto Dove Hill Road



Photograph 8: Tracking off of disturbed site onto Dove Hill Road



Photograph 9: Sediment in curblin along Dove Hill Road



Photograph 10: Straw wattle not installed or maintained as required in the SWMP



Photograph 11: Straw wattle not installed or maintained as required in the SWMP



Photograph 12: Straw wattle not installed or maintained as required in the SWMP



Photograph 13: Straw wattle not installed or maintained as required in the SWMP



Photograph 14: Straw wattle not installed or maintained as required in the SWMP



Photograph 15: Straw wattle not installed or maintained as required in the SWMP



Photograph 16: Straw wattle not installed or maintained as required in the SWMP



Photograph 17: Straw wattle not installed or maintained as required in the SWMP



Photograph 18: Straw wattle not installed or maintained as required in the SWMP



Photograph 19: Straw wattle not installed or maintained as required in the SWMP



Photograph 20: Straw wattle not installed or maintained as required in the SWMP



Photograph 21: Straw wattle not installed or maintained as required in the SWMP



Photograph 22: Straw wattle not installed or maintained as required in the SWMP



Photograph 23: Straw wattle not installed or maintained as required in the SWMP



Photograph 24: Straw wattle not installed or maintained as required in the SWMP



Photograph 25: Straw wattle not installed or maintained as required in the SWMP



Photograph 26: Straw wattle not installed or maintained as required in the SWMP



Photograph 27: Straw wattle not installed or maintained as required in the SWMP



Photograph 28: Straw wattle not installed or maintained as required in the SWMP



Photograph 29: Concrete waste disposed to ground, waste management controls not implemented



Photograph 30: Concrete waste disposed to ground, waste management controls not implemented



Photograph 31: Surface roughening not implemented as required in the SWMP



Photograph 32: Surface roughening not implemented as required in the SWMP



Photograph 33: Materials not managed to prevent pollution of stormwater



Photograph 34: Materials not managed to prevent pollution of stormwater



Photograph 35: Inlet protection in need of maintenance to remove accumulated sediment



Photograph 36: Inlet protection in need of maintenance to remove accumulated sediment



Photograph 37: Inlet protection in need of maintenance to remove accumulated sediment



Photograph 38: Concrete washout area not installed per the specification provided in the SWMP



Photograph 39: Adjacent wetland area on the north side of the site (photo looking north)



Photograph 40: Adjacent wetland area on the north side of the site (photo looking northwest)



Photograph 41: Control measures not implemented to manage pollutants for disturbed lots



Photograph 42: Control measures not implemented to manage pollutants for disturbed lots



Photograph 43: Control measures not implemented to manage pollutants for disturbed lots



Photograph 44: Control measures not implemented to manage pollutants for disturbed lots



Photograph 45: Control measures not implemented to manage pollutants for disturbed lots



Photograph 46: Control measures not implemented to manage pollutants for disturbed lots



Photograph 47: Control measures not implemented to manage pollutants for disturbed lots



Photograph 48: Control measures not implemented to manage pollutants for disturbed lots



Photograph 49: Control measures not implemented to manage pollutants for disturbed lots



Photograph 50: Control measures not implemented to manage pollutants for disturbed lots



Photograph 51: Control measures not implemented to manage pollutants for disturbed lots



Photograph 52: Control measures not implemented to manage pollutants for disturbed lots



Photograph 53: Control measures not implemented to manage pollutants for disturbed lots



Photograph 54: Silt fence not installed or maintained per specification



Photograph 55: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 56: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 57: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 58: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 59: Silt fence not installed or maintained per specification



Photograph 60: Silt fence not installed or maintained per specification



Photograph 61: Silt fence not installed or maintained per specification



Photograph 62: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 63: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 64: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 65: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 66: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 67: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 68: Silt fence not installed or maintained per specification



Photograph 69: Silt fence not installed or maintained per specification, wetland at top of photo



Photograph 70: Silt fence not installed or maintained per specification



Photograph 71: Silt fence not installed or maintained per specification



Photograph 72: Silt fence not installed or maintained per specification



Photograph 73: Sand bag curb checks in need of maintenance



Photograph 74: Sand bag curb checks in need of maintenance



Photograph 75: Sand bag curb checks in need of maintenance



Photograph 76: Sand bag curb checks in need of maintenance



Photograph 77: Soil stockpiles without control measures, Union Ditch to the right in the photo



Photograph 78: Soil stockpiles without control measures, Union Ditch to the right in the photo



Photograph 79: Silt fence stockpile control not installed or maintained per specification



Photograph 80: Silt fence stockpile control not installed or maintained per specification



Photograph 81: Silt fence stockpile control not installed or maintained per specification



Photograph 82: Silt fence stockpile control not installed or maintained per specification



Photograph 83: Silt fence stockpile control not installed or maintained per specification



Photograph 84: Silt fence stockpile control not installed or maintained per specification



Photograph 85: Straw wattle around stockpiles, not installed or maintained per specification



Photograph 86: Straw wattle around stockpiles, not installed or maintained per specification



Photograph 87: Straw wattle around stockpiles, not installed or maintained per specification



Photograph 88: Straw wattle around stockpiles, not installed or maintained per specification