

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SAN DIEGO REGION  
WATERSHED MANAGEMENT PROGRAM

FACILITY INSPECTION REPORT

Attachment # 2

INSPECTION DATE: November 27, 2007 TIME: 9 am WDID: 937C322900

FACILITY REPRESENTATIVE(S) PRESENT DURING INSPECTION: Kristin Thomas (NCTD) Jodi Leothecue, (West Coast Rail, Inc.), Rick Felkins, (West Coast Rail Contractors)

North County Transit District  
NAME OF OWNER, AGENCY OR PARTY RESPONSIBLE FOR DISCHARGE

Don Bullock, (760) 737-8625  
OWNER CONTACT NAME AND PHONE #

Sprinter Rail Project  
FACILITY OR DEVELOPER NAME (if different from owner)

Steven Hoyle, (760) 737-8625 x254  
FACILITY OR DEVELOPER CONTACT NAME AND PHONE #

808 Rancheros Drive  
FACILITY STREET ADDRESS

San Marcos, CA  
FACILITY CITY AND STATE

APPLICABLE WATER QUALITY LICENSING REQUIREMENTS

- MS4 URBAN RUNOFF REQUIREMENTS NPDES NOS. CAS0108758, CAS0108740 or CAS0108766
- GENERAL PERMIT ORDER NO. 99-08-DWQ, NPDES NO. CAS000002 - CONSTRUCTION
- GENERAL PERMIT ORDER NO. 99-06-DWQ, NPDES NO. CAS000003 - CALTRANS
- GENERAL OR INDIVIDUAL WASTE DISCHARGE REQUIREMENTS
- GENERAL OR INDIVIDUAL WAIVER OF WASTE DISCHARGE REQUIREMENTS
- SECTION 401 WATER QUALITY CERTIFICATION
- CWC SECTION 13264

INSPECTION TYPE (Check One)

- A1      "A" type compliance--Comprehensive inspection in which samples are taken. (EPA Type S)
- B1  X  "B" type compliance--A routine nonsampling inspection. (EPA Type C)
- 02      Noncompliance follow-up--Inspection made to verify correction of a previously identified violation.
- 03  X  Enforcement follow-up--Inspection made to verify that conditions of an enforcement action are being met.
- 04  X  Complaint--Inspection made in response to a complaint.
- 05      Pre-requirement--Inspection made to gather info. relative to preparing, modifying, or rescinding requirements.
- 06      No Exposure Certification (NEC) - verification that there is no exposure of industrial activities to storm water.
- 07      Notice of termination request for industrial facilities or construction sites - verification that the facility or construction site is not subject to permit requirements (Type, NOT I or NOT C - circle one).
- 08      Compliance Assistance Inspection - Outreach inspection due to discharger's request for compliance assistance.

INSPECTION FINDINGS

Y  Were violations noted during this inspection? (Yes/No/Pending Sample Results)       
 N  Were samples taken? (N=no) If YES then, G= grab or C= Composite and attach a copy of the sample results/chain of custody form

I. COMPLIANCE HISTORY:

Notice of Violation (NOV) No. R9-2007-0050 was issued on March 19, 2007 for construction storm water permit violations including discharge of sediment, and inadequate BMPs.  
NOV No. R9-2007-0063 was issued on April 3, 2007 for construction storm water permit violations including discharge of sediment and inadequate BMPs.  
Administrative Civil Liability No. R9-2007-0093 was issued on August 31, 2007 for construction storm water permit violations including discharge of sediment, inadequate BMPs, and inadequate inspections.  
NOV No. R9-2007-0208 was issued on October 15, 2007 for construction storm water permit violations mainly involving inadequate BMPs.

FACILITY: North County Transit District Sprinter Rail\_ (WDID)\_9 37C322900\_ INSPECTION DATE: 11/27/07\_

## II. FINDINGS

On November 27, 2007, Ben Neill and Peter Peuron of the Regional Board's Central Watershed Unit inspected the North County Transit District's (NCTD) construction of the Sprinter Rail. The inspection observed construction activities along:

1. Oceanside Transit Center, Oceanside
2. Coast Highway Station, Oceanside
3. Crouch Street Station, Oceanside
4. El Camino Real Station, Oceanside
5. Rancho Del Oro Station, Oceanside
6. College Boulevard Station, Oceanside
7. Melrose Drive Station, Oceanside
8. Vista Transit Center, Vista
9. Escondido Avenue Station, Vista
10. Mar Vista Drive storage yard, Vista
11. Buena Creek Station, Unincorporated San Diego County

The National Weather Service's website predicts no chance of rain today, for this area, however, there is a 40% chance of rain for Friday, November 30, 2007 (three days from this date).

**1. Oceanside Transit Center in Oceanside** - The Sprinter tracks are southwest of a transit station that is already being used by the Coaster, Amtrak and Metrolink. This station is near the corner of Tremont Street and Seagaze Drive. A long stretch of west-facing slope was without erosion controls - only fiber roll at the toe of the slope. In addition, there was a significant amount of trash and sediment in a concrete-lined ditch below the slope (Photo 1). The ditch led to a storm drain inlet with a silt fence that was in disrepair (Photo 2). Further to the south, a similar silt fence that was being used for inlet protection was completely collapsed (Photo 3). Also, fiber rolls had fallen into the ditch at this location and gravel bags outside the inlet provided inadequate inlet protection. The channel here consists of bare dirt which will result in sediment loads in the storm drain system during rainfall. Further along this channel, additional fiber rolls were observed to be dislodged into the earthen channel (Photo 4). Near another drain inlet, a silt fence had been knocked down by construction trash (Photo 5). Lack of stabilization of the earthen channel, improperly installed fiber rolls and inadequate inlet protection was evident at another location between the Oceanside Transit Center and Wisconsin Street (Photo 6). Failing or inadequately installed fiber rolls and lack of stabilization of bare soil was evident along this entire stretch of tracks (Photos 7, 8 and 9).

**2. Coast Highway Station in Oceanside** - This station construction is southwest of the intersection of Coast Highway and Godfrey Street. Sediment tracking BMPs were lacking in a dirt field next to the parking lot and there were no source or sediment controls for a stockpile of soil (Photo 10). A storm drain inlet in the station lacked any protection even though sediment was present in the area of the drain (Photo 11). Unstabilized slopes and inadequate inlet protection were also evident at this station (Photo 12) including an expansive, unprotected west-facing slope above another unstabilized earthen channel (Photo 13).

**3. Crouch Street Station in Oceanside** - This station is located near the intersection of Crouch Street and Oceanside Boulevard. Exposed dirt behind curbs lacked sediment controls while inlet protection nearby was also lacking (Photos 14 and 15). Fiber rolls near Loma Alta Creek were not trenched in (Photo 16). Slopes along the creek lacked erosion controls and sediment controls (Photos 17, 19 and 20). Cold mix (asphalt) was left out in a field without any BMPs (Photo 18).

**4. El Camino Real Station in Oceanside** - This station is located at the intersection of El Camino Real and Industry Road. A storm drain inlet at the station lacked sediment controls although it was surrounded by dirt (Photo 21). Both sides of Loma Alta Creek were in serious need of both erosion and sediment controls. Bare, friable soil on generally steep slopes in this area constitute a significant erosion hazard (Photos 22 through 26).

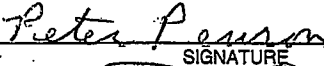
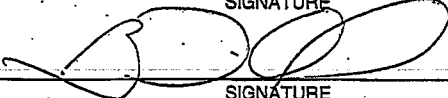
**5. Rancho Del Oro Station in Oceanside** - This station is bordered by Rancho del Oro Road to the east. Loma Alta Creek runs through the north side of the station. A pedestrian bridge is being built over the creek to access the station. A silt fence was installed in Loma Alta Creek where it will not prevent impacts to the creek (since it will only attenuate sediment that has already reached the bed of the creek) and the slopes above the creek were without erosion controls (Photo 27). Note that these violations were cited in the October 5, 2007 inspection report (and NOV No. R9-2007-0208) and still have not been corrected.

FACILITY: North County Transit District Sprinter Rail\_ (WDID)\_9 37C322900\_ INSPECTION DATE: 11/27/07\_

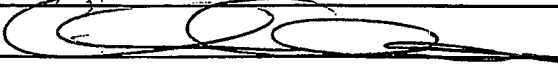
- 6. **College Blvd Station in Oceanside** - This station is next to Loma Alta Creek in a shopping center on the southwest corner of College Boulevard and Oceanside Boulevard. Erosion controls have not been implemented on the banks of Loma Alta Creek, even though this violation was noted in NOV No. R9-2007-0208 pursuant to the October 5, 2007 inspection (Photo 28).
- 7. **Melrose Drive station in Oceanside**- This station is on the southwest corner of Melrose Drive and Oceanside Boulevard next to a convenience store. The headwaters to Loma Alta Creek flow adjacent to the south side of the tracks. Lack of erosion controls were cited in several prior NOV's. Erosion controls have still not been implemented in the area of the station (Photos 29, 30 and 32). Photo 30 shows that hydroseed was applied far to the west of the station but the application was discontinued, leaving no erosion controls (only fiber roll which is a sediment control) in the area of the station. Sections of fiber roll abut each other (do not overlap). This problem was cited in past NOV's. In addition (another problem cited in earlier NOV's) fiber rolls were not trenched in. A storm drain in the station area lacked inlet protection (Photo 31). Lack of sediment tracking controls in an area west of the parking lot was cited in the last NOV. Sediment tracking controls were still lacking in this area (Photo 33).
- 8. **Vista Transit Center in Vista.** The Vista Transit Center is located near the corner of Vista Village Drive and Santa Fe Avenue. Station construction appears to be near completion at this location, however, landscaping has not been initiated leaving large areas of exposed soil. Cement bags stored in the parking lot were leaking cement powder (Photo 34). Dirt slopes surrounding the parking lot were without erosion or sediment controls (Photos 35 and 36). An inlet in the station was well protected by gravel bags (Photo 37).
- 9. **Escondido Avenue Station in Vista.** This station is located at the intersection of Escondido Avenue and Phillips Street. Dirt slopes surrounding the parking lot had no erosion or sediment controls (Photo 38). Gravel bags outside a storm drain inlet were not stacked high enough to adequately protect the inlet (Photo 39). In addition, the channel leading to this inlet lacked any stabilization. An inlet in the parking lot was covered with filter fabric, but did not have sufficient sediment controls (e.g. gravel bags) to prevent clogging by sediment (Photo 40). Another storm drain inlet in the parking lot had no inlet protection whatsoever (Photo 41).
- 10. **Mar Vista Drive storage yard in Vista** – This location has been cited in several prior NOV's. A persistent problem has been the lack of proper coverage and containment of construction debris that is stored at this site. Once again, a large amount of debris was laying exposed in the middle of the yard (Photo 42).
- 11. **Buena Creek Station in San Diego County (Unincorporated).** This station is located at the intersection of Buena Creek Road and Santa Fe Avenue. Once again, station construction is near completion, but landscape installation has not yet begun. In this case, an effective erosion control (a coconut blanket) was being employed (Photo 43).

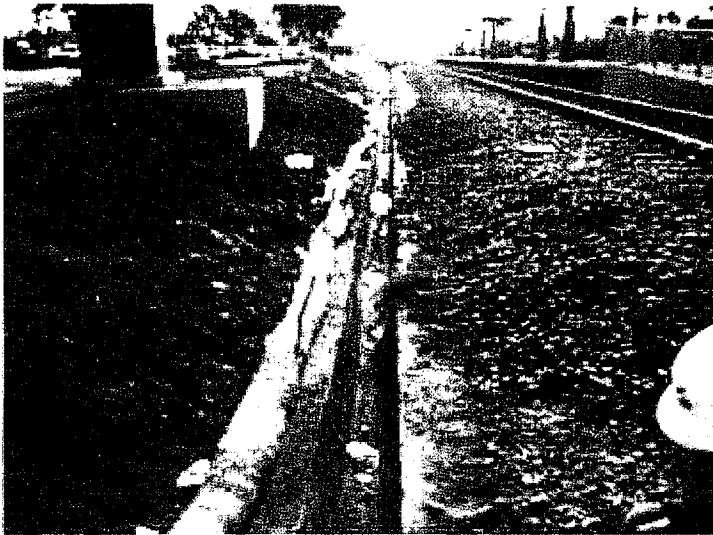
The lack of erosion controls, sediment controls, sediment tracking BMPs, trash storage BMPs, and soil stockpile BMPs are all violations that were previously noticed in NOV No. R9-2007-0050 on March 19, 2007, NOV No. R9-2007-0063 on April 3, 2007 and NOV R9-2007-0208 on October 15, 2007. The August 31, 2007 ACL was also assessed in part for these same BMP violations.

III. SIGNATURE SECTION

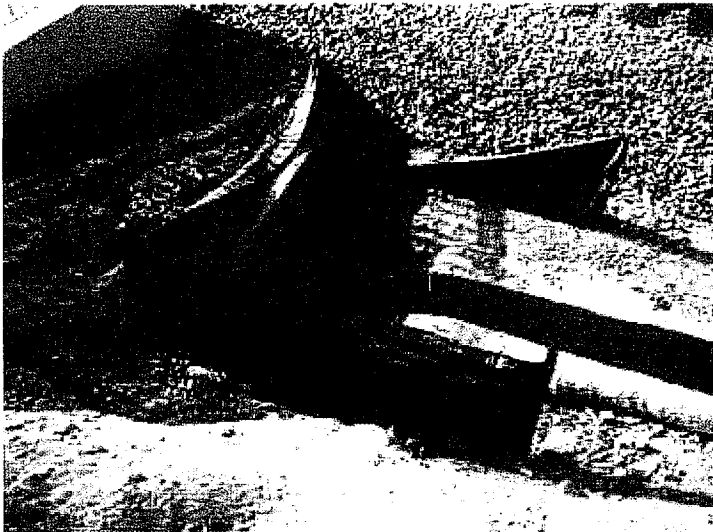
Peter Peuron STAFF INSPECTOR	 SIGNATURE	November 27, 2007 INSPECTION DATE
Ben Neill STAFF INSPECTOR	 SIGNATURE	November 27, 2007 INSPECTION DATE

IV. (For internal use only)

Reviewed by Supervisor: 	Date: 12/10/07
cc: Jeremy Johnstone (EPA), John Norton (SWRCB), City _____ Storm Drain Enforcer	
Inter-office Referral: 1) _____ 2) _____ 3) _____ 4) _____ 5) _____	



1. Drainage ditch with a significant amount of trash and sediment. No erosion controls on slope.



Photos 1 through 9 were taken in the vicinity of the Oceanside Transit Center and at the Wisconsin Street crossing.

2. Silt fence in need of maintenance.



3. Silt fence not properly maintained, fiber roll dislodged into drainage ditch and insufficient inlet protection. Earthen channel needs stabilization.



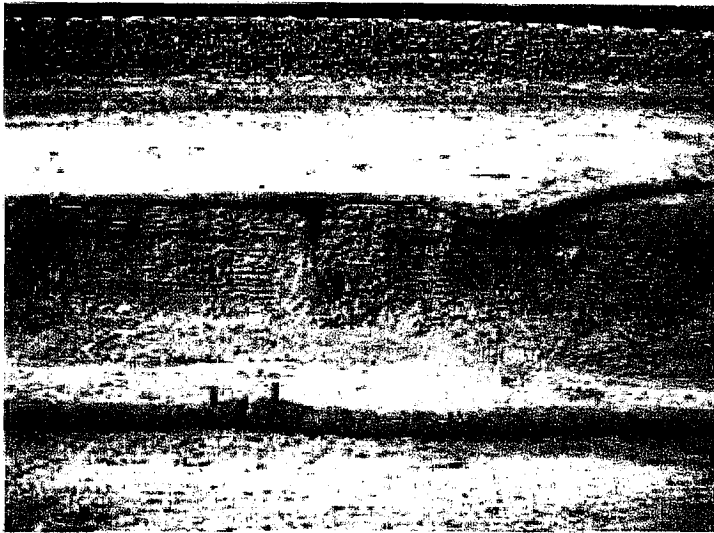
4. Fiber rolls on slopes out of place due to not being adequately staked in and trenched in.



5. Silt fence flattened by construction debris above head wall of storm drain inlet.



6. No erosion controls on slopes. Inadequate inlet protection. Fiber rolls not trenched in. Dirt channel needs protection.



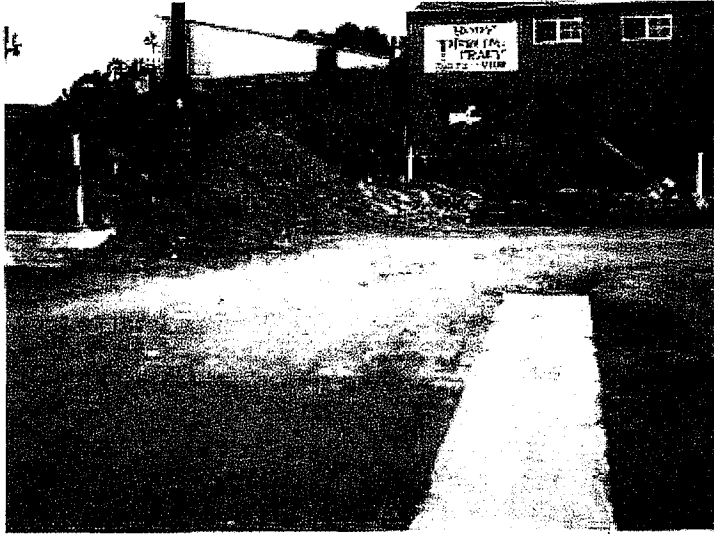
7. Inadequately maintained fiber rolls resulting in erosive rills.



8. Gully formed below a storm water outfall – no erosion controls.

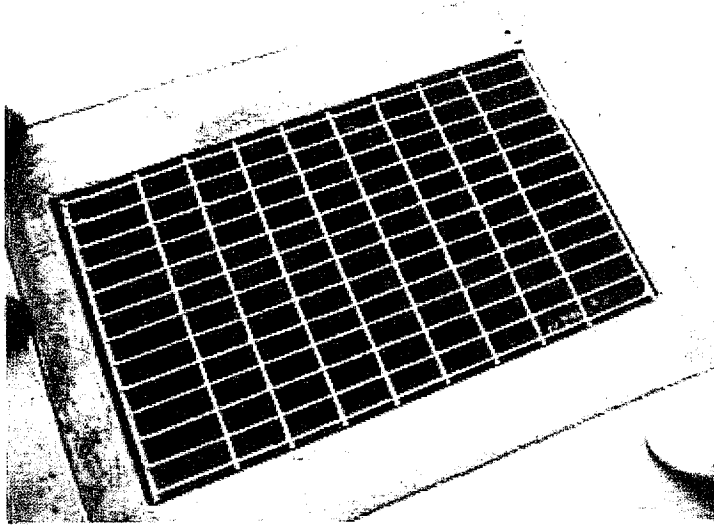


9. Fiber roll not properly staked in.

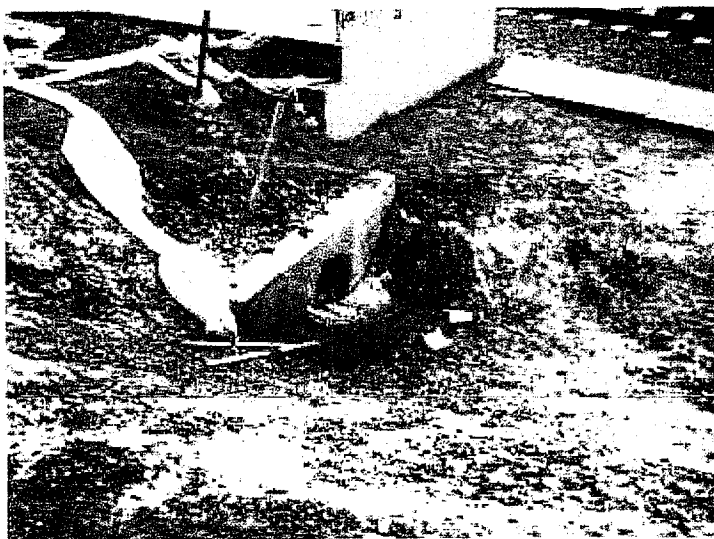


10. Sediment tracking on pavement and soil stockpile without erosion and sediment controls.

Photos 10 through 12 were taken at the Coast Highway Station.



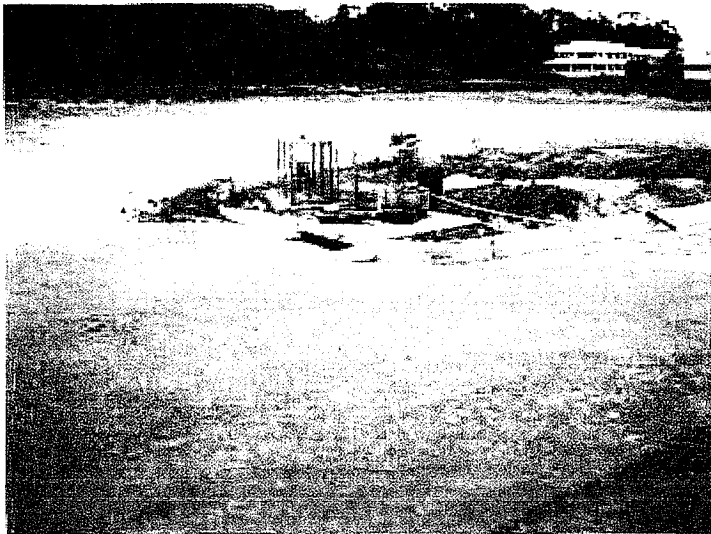
11. Storm drain inlet lacking inlet protection.



12. Inadequate inlet protection in an area with unstabilized slopes.

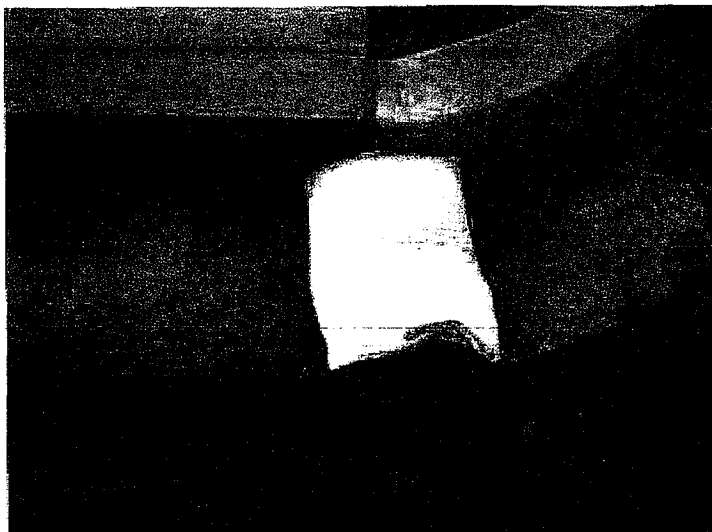


13. Exposed slopes with no erosion controls or sediment controls.



Photos 14 through 20 were taken at the Crouch Street Station.

14. Lack of sediment controls at curbs and incomplete inlet protection.



15. Inlet needs more protection.





16. Fiber roll not properly  
trenched in.



17. No erosion or sediment  
controls on slopes.



18. Cold mix stockpile without  
protections.

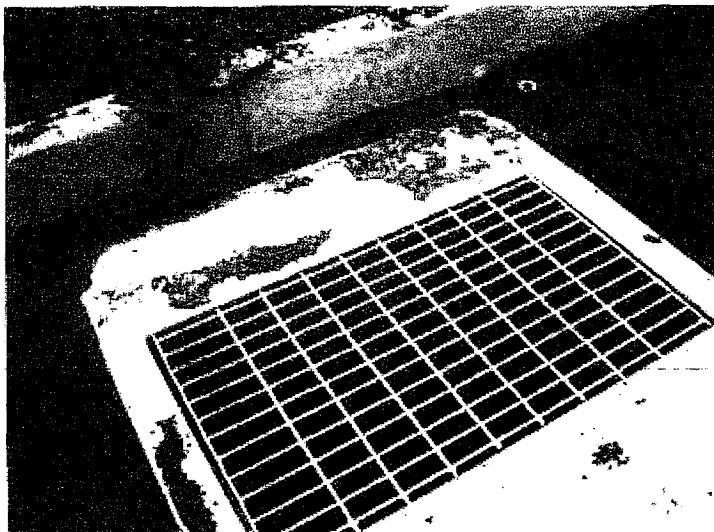


19. No erosion or sediment control along Loma Alta Creek.



20. Lack of erosion and sediment controls for exposed soil.

Photos 21 through 26 were taken at the El Camino Real Station.



21. No inlet protection.



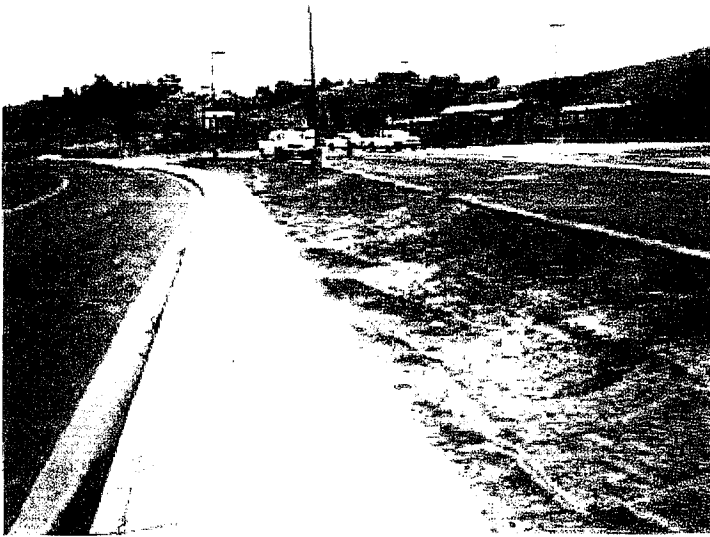
22. No erosion or sediment controls on steep slopes along Loma Alta Creek.



23. No erosion or sediment controls next to bridge on Loma Alta Creek.



24. Lack of erosion and sediment controls. Silt fence provides incomplete sediment control because it terminates prematurely.



25. No erosion or sediment controls.

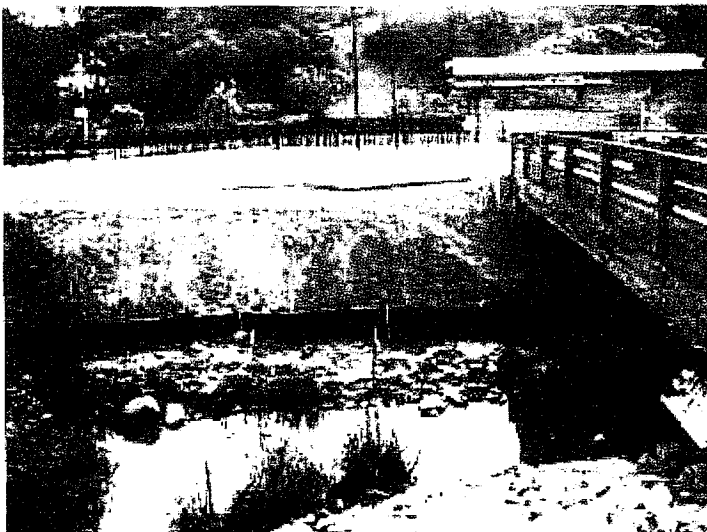


26. No erosion or sediment controls on north-facing slope next to station.

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Photo 27 was taken at the Rancho Del Oro Station.

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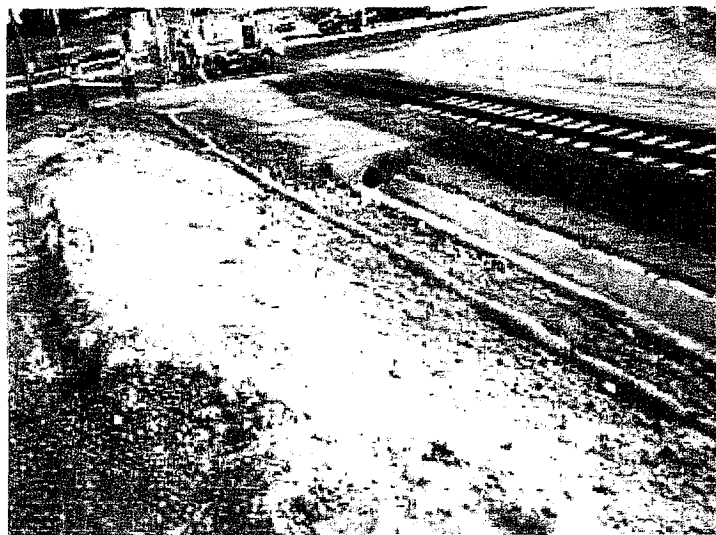


27. Silt fence improperly installed in Loma Alta Creek. No erosion controls on south-facing slope. Same violations noted in NOV No. R9-2007-0208.



Photo No. 28 was taken at the College Boulevard Station.

28. Continued lack of erosion controls on north-facing slope – same violation noted NOV No. R9-2007-0208.

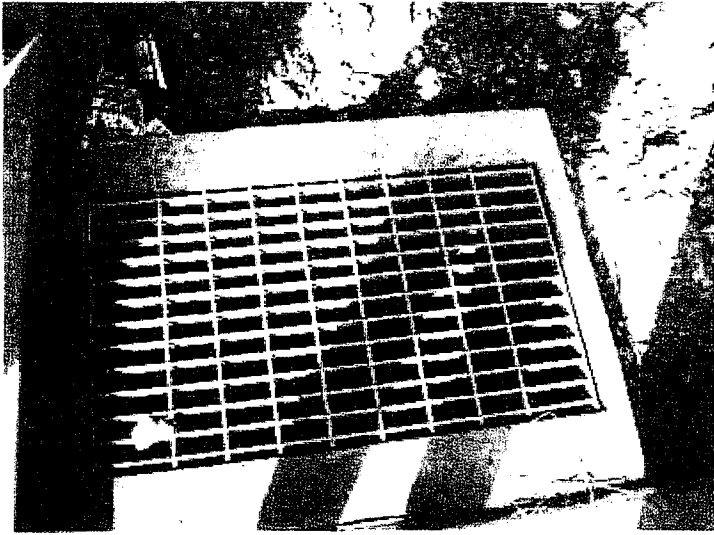


Photos 29 through 33 were taken at Melrose Station.

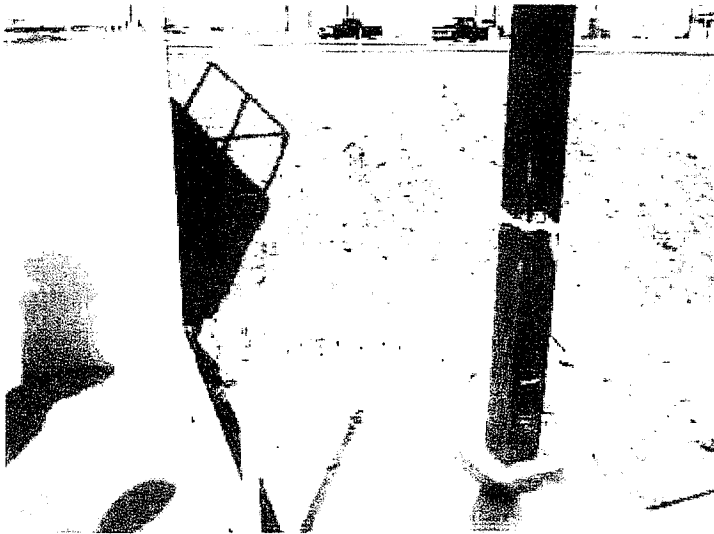
29. No erosion controls on north-facing slope.



30. North-facing slope – looking to the east. Large area left without hydroseed.



31. No inlet protection in area still under construction.



32. No sediment or erosion controls in area above storm drain inlet. No inlet protection.

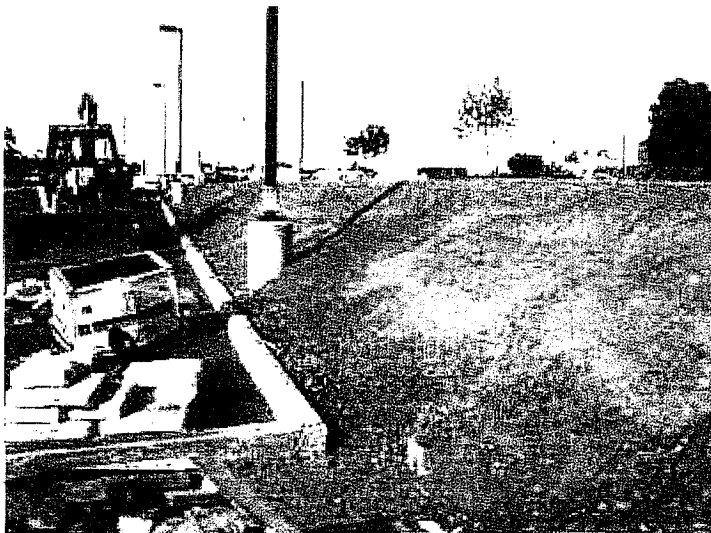


33. No sediment controls to prevent sediment tracking.

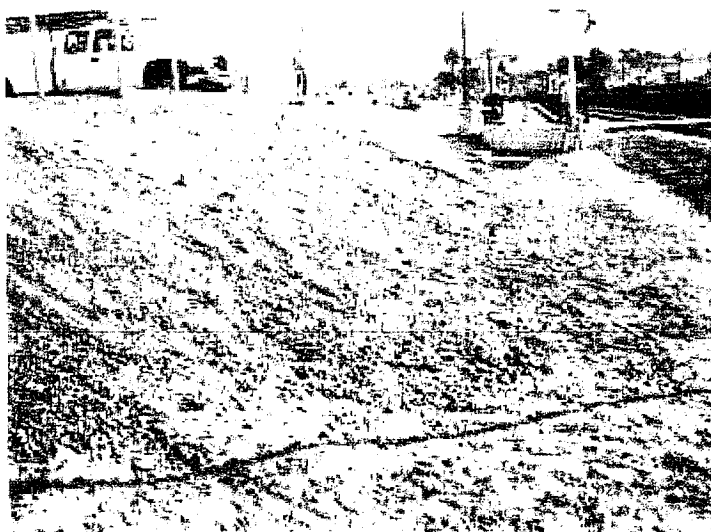


Photos 34 through 37 were taken at the Vista Transit Center.

34. Cement mix spilled in parking area.



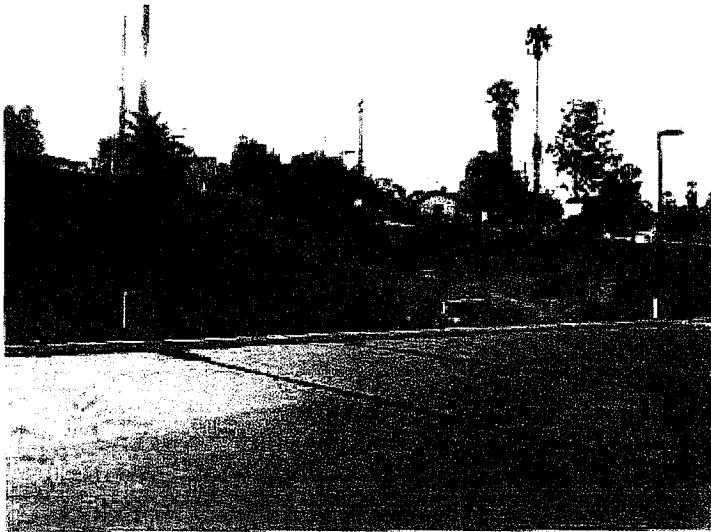
35. No sediment or erosion controls on slopes surrounding the parking lot.



36. No sediment or erosion controls on exposed slopes.



37. Properly installed gravel bags.



Photos 38 through 41 were taken at the Escondido Avenue Station.

38. No erosion or sediment controls on slopes.

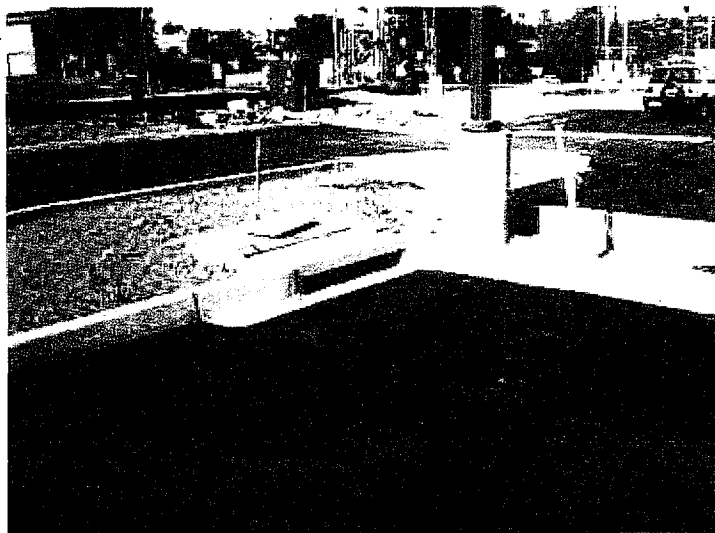


39. Gravel bags not stacked high enough to adequately protect drain inlet. No erosion protection in earthen channel.





40. Filter fabric needs additional controls to prevent clogging by sediment.



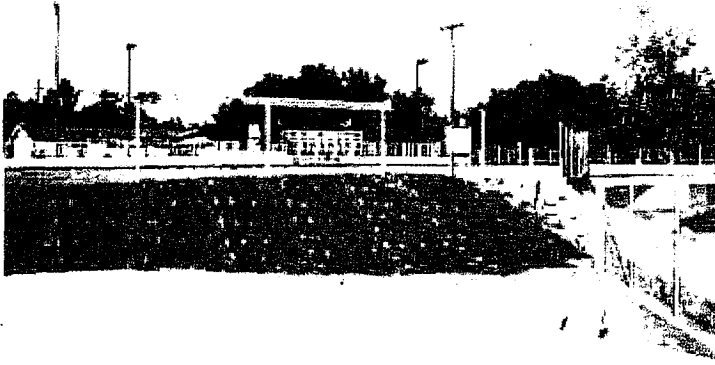
41. Storm drain lacks inlet protection. Parking lot still susceptible to sediment flows.



Photo 42 was taken at the Mar Vista storage yard.

42. Construction debris not properly covered or contained. Same problem noted in February of 2007.

Photo 43 was taken at  
the Buena Creek Station.



43. Coconut blanket provides  
effective slope stabilization.