

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

California Regional Water Quality Control Board, San Diego Region

May 23, 2016

**NOTICE OF VIOLATION
No. R9-2016-0125**

Mr. Jose Capati, Vice President of Development
Baldwin & Sons
USA Portola Properties LLC
280 Newport Center Drive
Newport Beach, CA 92660

USA Portola Properties LLC

Portola Center Northwest - TTM 17300 and
401 Certification

PIN No. SM-831425

Violations of

**Order No. 2009-0009-DWQ,
Construction General Permit**

and

**Clean Water Act Section 401 Water
Quality Certification No.
R9-2013-0113 (Portola Center
Project)¹**

USA Portola Properties LLC and Baldwin & Sons (Baldwin) are hereby notified that the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) reserves the right to take any enforcement action authorized by law for the violations described herein.

USA Portola Properties LLC and Baldwin are in violation of State Water Resources Control Board (State Water Board) Order No. 2009-0009-DWQ, NPDES No. CAS000002, *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit or Permit) and Clean Water Act Section 401 Water Quality Certification No. R9-2013-0113, Portola Center Project, (401 Certification or Certification Permit).

¹ Clean Water Act section 401 Water Quality Certification R9-2013-0113 was issued to USA Portola Properties LLC for impacts resulting from the entire development of the Portola Center Project that consist of the Portola Center Northwest, Portola Center Northeast, and Portola Center South Planning Areas (TTM 17300 and TTM 15353).

USA Portola Properties LLC and Baldwin (Discharger) are constructing approximately 81 dwelling units in the Northwest Planning Area of the Portola Center Project (Project).² The Project is located on an approximately 196 acre site in the Portola Hills Community of the City of Lake Forest, California.³ This Notice of Violation addresses violations of the Construction General Permit Northwest Planning Area and the 401 Certification. The 401 Certification was issued to the Discharger for the entirety of the Project.

A. Summary of Violations

Construction General Permit Violations

1. Failure to Comply with Discharge Prohibitions for Construction Activities:

- a. **Pursuant to Provision III.B of State Water Board Order No. 2009-0009-DWQ:**
All discharges are prohibited except for the storm water and non-storm water discharges specifically authorized by this Permit or another NPDES permit.
- b. **Observation:** On January 19, 2016, March 14, 2016, and March 21, 2016, the San Diego Water Board inspected the Portola Northwest construction site (WDID 930C371094). Mr. Jose Capati, Vice President of Development for Baldwin & Sons, is the Legally Responsible Person (LRP) enrolled under the Permit for the site and is the owner of USA Portola Properties LLC. San Diego Water Board inspectors observed on January 19, 2016, evidence of sediment and sediment-laden storm water discharged from the site. San Diego Water Board inspectors also observed evidence on January 19, 2016, that the Discharger failed to implement adequate Best Management Practices (BMPs) which resulted in the sediment and sediment-laden storm water to discharge from the site. See attached January 19, 2016, Facility Inspection Report, Photo Location Maps B through G, Photos 51, 62 through 63, and Photos 66 through 68.

2. Failure to Comply with the Conditions of the Permit:

- a. **Pursuant to Provision IV.A.1 of State Water Board Order No. 2009-0009-DWQ:**
The Discharger shall comply with all of the conditions of this Permit. Any Permit non-compliance constitutes a violation of the Clean Water Act and the Porter-Cologne Water Quality Control Act and is grounds for enforcement action and/or removal from Permit coverage.

² The Portola Center Project is separated into two Tentative Tract Maps (TTM15353 and TTM17300) and consists of a mix of single family and multi-family homes, public and neighborhood parks, public trails, and a small neighborhood serving retail component. The Project site is bifurcated by Glenn Ranch Road east to west and Saddleback Ranch Road north to south, breaking the Project site into three separate planning areas, the Portola South Planning Area, the Portola Northwest Planning Area, and the Portola Northeast Planning Area.

- b. Observation:** San Diego Water Board inspectors observed on January 19, 2016, March 14, 2016, and March 21, 2016, evidence that the Discharger failed to comply with the conditions of the Permit. See attached Facility Inspection Report⁴ Findings 1 through 16, Photo Location Maps B through G, Photos 50 through 68, and Attachments 1 through 9.

3. Failure to Comply with Duty to Mitigate Discharge to the Environment for Construction Activities:

- a. Pursuant to Provision IV.D of State Water Board Order No. 2009-0009-DWQ:**
The Discharger shall take all responsible steps to minimize or prevent any discharge which has a reasonable likelihood of adversely affecting human health or the environment.
- b. Observation:** San Diego Water Board inspectors observed on January 19, 2016, evidence that the Discharger failed to take all responsible steps to minimize, or prevent, the sediment and sediment-laden storm water discharges that occurred during the January 4, 2016, rain event which resulted in adverse impacts to Aliso Creek, tributaries to Aliso Creek, Serrano Canyon Creek, tributaries to Serrano Canyon Creek, and offsite mitigation areas regulated under Clean Water Act section 401 Water Quality Certification No. R9-2013-0113 (401 Certification). See attached Facility Inspection Report Findings 1 through 10, 12, 13, and 16, Photo Location Maps B through G, Photos 50 through 68, and Attachments 1 through 9.

4. Failure to Comply with Proper Operation and Maintenance of BMPs to Achieve Permit Compliance for Construction Activities:

- a. Pursuant to Provision IV.E of State Water Board Order No. 2009-0009-DWQ:**
The Discharger shall at all times properly operate and maintain any facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Discharger, including when necessary, proper laboratory controls, quality assurance procedures, and back up or auxiliary systems, to achieve compliance with the conditions of the Permit.
- b. Observation:** San Diego Water Board inspectors observed on January 19, 2016, March 14, 2016, and March 21, 2016, evidence that the Discharger failed to properly operate and maintain BMPs to achieve compliance with the Permit. See attached Facility Inspection Report Findings 1 through 16, Photo Location Maps B through G, Photos 50 through 68, and Attachments 1 through 9.

⁴ Facility Inspection Report includes photos, findings, and conclusions from January 19, 2016, March 14, 2016, and March 21, 2016 San Diego Water Board inspections.

5. Failure to Comply with Effluent Limitations for Construction Activities:

- a. **Pursuant to Provisions V.A.2 of State Water Board Order No. 2009-0009-DWQ:** Dischargers shall minimize or prevent pollutants in storm water discharges and authorized non-storm water discharges through the use of controls, structures, and management practices that achieve Best Available Technology Economically Achievable (BAT) for toxic and non-conventional pollutants and Best Conventional Pollutant Control Technology (BCT) for conventional pollutants.
- b. **Pursuant to Provision X and Section A.1.b of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Dischargers shall minimize or prevent pollutants in storm water and authorized non-storm water discharges through the use of controls, structures, and management practices that achieve BAT for toxic and non-conventional pollutants and BCT for conventional pollutants.
- c. **Observation:** During the January 19, 2016, inspection San Diego Water Board inspectors observed that the Discharger failed to minimize or prevent pollutants in storm water and authorized non-storm water discharges through the use of controls, structures, or BMPs to achieve BAT and/or BCT. The Discharger failed to adequately implement BMPs required by the Permit on a Risk Level 2 site. San Diego Water Board inspectors observed on January 19, 2016, March 14, 2016, and March 21, 2016 that the Discharger failed to adequately implement management, erosion, runoff, and run-on control BMPs which led directly to erosion and sedimentation on-site. The failure to adequately implement BMPs in accordance with the BAT and/or BCT Permit requirements directly resulted in the discharge of sediment and sediment-laden storm water runoff from the site to Aliso Creek, Serrano Canyon Creek, tributaries to Aliso Creek and Serrano Creek Canyon Creek, and offsite mitigation areas regulated under the 401 Certification permit. The failure to achieve BAT and/or BCT was a result of the Discharger's failure to implement slope stabilization BMPs, erosion and sediment control BMPs, scheduling of construction activities, and to adequately size or construct sediment basins and/or traps to contain highly erosive soils mobilized during storm events. See attached Facility Inspection Report Compliance History, Inspection Summary, Findings 1 through 16, and Attachments 1 through 9.

6. Failure to Implement Good Site Management "Housekeeping" BMPs for Construction Materials and Waste Management:

- a. **Pursuant to Provision X and Section B.1.b of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Risk Level 2 dischargers are required to cover and berm loose stockpiled construction materials that are not actively being used (i.e. soil, spoils, aggregate, fly-ash, stucco, hydrated lime, etc.).
- b. **Pursuant to Provision X and Section B.2.f of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Risk Level 2 dischargers are required to

contain and securely protect stockpiled waste material from wind and rain at all times unless actively being used.

- c. **Observation:** During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed stockpiles of construction materials and waste materials without adequate berm or containment. See attached Facility Inspection Report Photos 50, 53, 57, 61 and Attachment 6.

7. Failure to Implement Good Site Management “Housekeeping” BMPs for Construction Materials and Waste Management:

- a. **Pursuant to Provision X and Section B.1.c, B.2.g, and B.2.h of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Risk Level 2 dischargers are required to store chemicals in watertight containers with secondary containment or in a storage shed, implement procedures to effectively address hazardous and non-hazardous waste spills, and develop and implement a spill response plan in accordance with the SWPPP.
- b. **Pursuant to Provision X and Section B.3 of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Risk Level 2 dischargers are required to implement good housekeeping for vehicle storage and maintenance of construction equipment.
- c. **Observation:** During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed unmaintained construction equipment and hazardous waste stored without secondary containment on the site. See attached Facility Inspection Report Photos 50, 52, 54, 55, 60 and Attachment 6.

8. Failure to Implement Adequate Erosion Controls for Inactive Areas:

- a. **Pursuant to Provision X and Section D.2 of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Risk Level 2 dischargers shall provide effective soil cover for inactive areas and all finished slopes, open space, utility backfill, and completed lots.
- b. **Observation:** During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed many areas throughout the site that appeared inactive, or could have been scheduled to be inactive, without effective soil cover or other BMPs to prevent erosion. Evidence of erosion and sediment transport due to inadequate or ineffective erosion control measures for inactive areas was observed throughout the site during the inspections. See attached Facility Inspection Report Findings 1 through 6, Photo Location Maps E through G, Photos 51 and 61, and Attachment 6.

9. Failure to Implement Adequate Erosion Controls for Active Areas:

- a. **Pursuant to Provision X and Section E.3 of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Risk Level 2 dischargers shall implement appropriate erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active construction.
- b. **Observation:** During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed many areas on the site that may have been considered active without evidence of runoff control or soil stabilization BMPs implemented to prevent erosion prior to, or during a storm event that began January 4, 2016 and was expected to continue to January 8, 2016. Evidence of erosion and sediment transport due to inadequate or ineffective erosion control measures for active areas was observed throughout the site during the inspections. Documentation for the site indicates that no erosion control BMPs were planned or prepared for implementation on active areas in accordance with the Storm Water Pollution Prevention Plan (SWPPP) uploaded to SMARTS by the Discharger. See attached Facility Inspection Report Compliance History, Findings 1 through 12 and 16, Photo Location Maps E through G, Photos 58 and 59, and Attachments 1 through 9.

10. Failure to Implement Adequate Linear Sediment Controls for Exposed Slopes:

- a. **Pursuant to Provision X and Section E.4 of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Risk Level 2 dischargers shall apply linear sediment controls along the toe of the slope, face of the slope, and at the grade breaks of exposed slopes to comply with sheet flow lengths in accordance with Table 1 (i.e. every 20 feet for 0-25% slopes, every 15 feet for 25-50% slopes, and every 10 feet for slopes over 50%).
- b. **Observation:** During the January 19, 2016, March 14, 2016, and March 21, 2016 inspections, San Diego Water Board inspectors observed slopes throughout the site without linear sediment controls along the face of the slope and/or grade breaks of exposed slopes. See attached Facility Inspection Report Photo Location Maps E through G, Photos 51, 53, and 58 through 68, and Attachment 6.

11. Failure to Implement Adequate Run-on and Runoff Controls:

- a. **Pursuant to Provision X and Section F of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Risk Level 2 dischargers shall manage all run-on, all runoff within the site and all runoff that discharges from the site. Run-on from off-site shall be directed away from all disturbed areas or shall collectively be in compliance with the effluent limitations of the Permit.
- b. **Observation:** During the January 19, 2016, March 14, 2016, and March 21, 2016 inspections, San Diego Water Board inspectors observed a lack of effective controls

for run-on to the site, a lack of effective controls for runoff within the site, and a lack of effective controls for runoff from the site. See attached Facility Inspection Report Photo Location Maps E through G, Photos 52, 59, 62, and 66 through 68.

12. Failure to Identify and Record BMPs That Need Maintenance to Operate Effectively, or That Have Failed, or Could Fail to Operate as Intended:

- a. **Pursuant to Provision X and Section G.2 of Attachment D of State Water Board Order No. 2009-0009-DWQ:** Risk Level 2 dischargers shall perform weekly inspections and observations, and at least once each 24-hour period during extended storm events, to identify and record BMPs that need maintenance to operate effectively, that have failed, or that could fail to operate as intended.
- b. **Observation:** During the January 19, 2016, inspection, San Diego Water Board inspectors observed several BMPs throughout the site that were not implemented, required maintenance to operate effectively, that failed, or could fail to operate as intended. Documentation for the site indicates that the Qualified SWPPP Practitioner (QSP) conducting weekly inspections of BMPs failed to identify BMPs that were not implemented, required maintenance, failed, or failed to operate as intended. See attached Facility Inspection Report Findings 7 through 10, 12, 13, and 16, and Attachments 1 through 9.

13. Failure to Include Information in the SWPPP to Demonstrate Compliance with the Requirements of the Permit:

- a. **Pursuant to Provision XIV.B of State Water Board Order No. 2009-0009-DWQ:** To demonstrate compliance with requirements of the Permit, the QSD shall include information in the SWPPP that supports the conclusions, selections, use, and maintenance of BMPs.
- b. **Observation:** Following the January 19, 2016, inspection, San Diego Water Board inspectors reviewed the SWPPP uploaded by the Discharger to SMARTS. The Discharger did not include in the SWPPP the 401 Certification permit requirements for low flow from the site during construction of the site or adequate capacity of sediment basins for phasing of run-on and runoff controls due to site topography and vegetation changes during mass grading to prevent the discharge of sediment and sediment-laden storm water to Aliso Creek, Serrano Canyon Creek, tributaries to Aliso Creek and Serrano Creek, and the 401 Certification mitigation site. See attached Facility Inspection Report Compliance History, Findings 1, 7 through 10 and Comments 6, 8, 12, 16, and 18.

401 Water Quality Certification R9-2013-0113 Violations:

14. Pursuant to Condition II.D. Project Conformance with Application and Failure to Comply with General Conditions: Discharger is required to construct, implement and

comply with all water quality protection measures and BMPs described in the application and supplemental information.

Observations: During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed that the Discharger failed to implement, or had inadequately implemented, BMPs and water quality protection measures as described in the application and supplemental material which caused significant sediment and sediment laden water to discharge off site and cause impacts to Waters of the United States and/or State during the January 4, 2016, rain event. In addition, sediment-laden water was actively pumped off-site into Waters of the United States and/or State. See attached Facility Inspection Report Findings 1 through 16, Photo Location Maps E through G, Photos 50 through 68, and Attachments 4 and 6.

15. Pursuant to Condition II.G. Failure to Comply with Certification Distribution

Posting: Discharger is required to maintain a copy of the 401 Certification on-site and have it available at all times to site personnel and agencies and to provide a copy to all contractors and subcontractors on site who all must keep a copy in their possession.

Observations: During the January 19, 2016, site inspection San Diego Water Board inspectors requested from the QSP a copy of the 401 Certification. The QSP did not have a copy of the 401 Certification on site.

16. Pursuant to Condition III.D. Failure to Comply with the General Construction Storm Water Permit:

The Discharger is required to comply with the General Construction Storm Water Permit.

Observations: During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed that the Discharger did not implement, or adequately implement, BMPs and water quality protection measures as required by the Permit. See attached Facility Inspection Report Findings 1 through 16, Photo Location Maps E through G, Photos 50 through 68, and Attachment 6.

17. Pursuant to Condition III.E. Failure to Comply with Waste Management BMPs: The Discharger is required to properly manage, store, treat and dispose of waste.

Observations: During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed that the Discharger did not properly manage, store, treat or dispose of waste on site. See attached Facility Inspection Report, Finding 15 and Photos 50, 57, and 60, and Attachment 6.

18. Pursuant to Condition III.F. Failure to Comply with Waste Management Disposal

Prohibition: The Discharger is prohibited from dumping, deposition or discharge of trash, rubbish, unset cement or asphalt, damaged concrete or asphalt, concrete or asphalt soils, wash water, organic or earthen material, steel, sawdust or construction debris from the site directly into, or adjacent to, Waters of the United States and/or State.

Observations: During the January 19, 2016, inspection San Diego Water Board inspectors observed that the Discharger had not properly managed waste or earthen material on-site. As a result, on January 19, 2016, sediment /earthen material, and/or waste materials, were dumped, deposited or discharged from the site directly into, or adjacent to, Aliso Creek, tributaries to Aliso Creek, Serrano Creek Canyon, or tributaries to Serrano Creek Canyon. See attached Facility Inspection Report Findings 1 through 16, Photo Location Maps E through G, Photos 50, 52, 54, 55, 57, 60 and Attachment 6.

19. Pursuant to Conditions III.E. and III.G Failure to Comply with Downstream Erosion

Prohibition: The Discharger is prohibited from discharging concentrated flows that causes downstream erosion or damage to properties or stream habitat either during construction or after completion.

Observations: During the January 19, 2016, inspection San Diego Water Board inspectors observed that the Discharger failed to control run-on or runoff from the site and caused increased flows and velocity to the 401 Certification mitigation site, Aliso Creek, tributaries to Aliso Creek, Serrano Creek Canyon, or tributaries to Serrano Creek Canyon on January 19, 2016. See attached Facility Inspection Report Findings 1 through 16, and Photos 50 through 66, and Attachment 6.

20. Pursuant to Condition III.H. Failure to Comply with Construction Equipment

BMPs: The Discharger is required to position stationary equipment over drip pans or other types of containment.

Observations: During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed that the Discharger either did not use, or ineffectively used, drip pans under stationary equipment on site. See attached Facility Inspection Report Finding 14, Photos 52, 54, 55, and 60, and Attachment 6.

21. Pursuant to Condition III.K. Failure to Comply with Re-vegetation and Stabilization

Requirement: The Discharger is required to stabilize areas within 14 days of last activity or maintain BMPs on areas that were likely not active for 14 days. In addition, the Discharger is required to implement and maintain BMPs to prevent erosion on rough graded areas.

Observations: During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed that the Discharger did not stabilize areas within the last 14 days of inactivity or maintain adequate BMPs on areas that were likely not active for 14 days. See attached Facility Inspection Report Findings 1 through 16, Photo Location Maps E through G, Photos 50 through 68 and Attachment 6.

22. Pursuant to Condition III.L. Hazardous Materials Dischargers are required to prevent petroleum products and unused concrete from contaminating soil or entering waters of the United States and/or State that are hazardous to aquatic life.

Observations: During the January 19, 2016, March 14, 2016, and March 21, 2016, inspections San Diego Water Board inspectors observed that the Discharger did not prevent hazardous materials including petroleum products that were on the site from contaminating soils and waters. See attached Facility Inspection Report Findings 14 and 15, Photos 52, 54, 55, and 60, and Attachment 6.

23. Pursuant to Condition III.P. Failure to Comply with Beneficial Use Protection: The Discharger is required to take all necessary measures to protect the beneficial uses of waters of Aliso Creek and Serrano Canyon Creek and the unnamed tributaries of Aliso Creek and Serrano Canyon Creek. The 401 Certification requires that the Discharger comply with every aspect of the 401 Certification and if at any time there is an unauthorized discharge into surface waters, the construction activities shall cease and the San Diego Water Board will be notified.

Observations: During the January 4, 2016 storm event, unauthorized discharges occurred that impacted the beneficial uses of Aliso Creek, Serrano Canyon Creek and the unnamed tributaries of Aliso Creek and Serrano Canyon Creek. San Diego Water Board inspectors observed that the Discharger failed to cease work and notify the San Diego Water Board. See attached Facility Inspection Report, Photo Location Maps E through G, and Attachments 1 through 9.

24. Pursuant to Condition VII.A. Failure to Comply with Twenty-Four Hour Non-Compliance Reporting: The Discharger is required to report non-compliance with the 401 Certification that may endanger the environment orally to the San Diego Water Board within 24 hours from the time the Discharger is aware of the circumstances, followed by a written submission to the San Diego Water Board from the Discharger within 5 days describing the noncompliance, its cause, corrective actions that have or will be taken, and how recurrence will be prevented.

Observations: The Discharger failed to orally notify the San Diego Water Board within 24 hours of non-compliance with the conditions of the 401 Certification and submit a written report within five days of the non-compliance when sediment and sediment-laden water was discharged off-site into waters of the United States and/or State during the January 4, 2016, rain event. The San Diego Water Board inspectors observed during the January 19, 2016 inspection that erosion controls were placed in tributaries without authorization or notifications, stream habitat was impacted through both sedimentation and erosion, and that the Discharger failed to implement the requirements of the 401 Certification and the Construction General Permit. See attached Facility Inspection Report, Attachment 4.

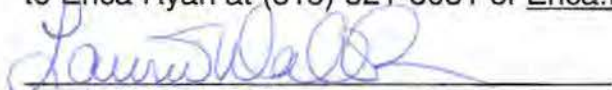
B. Summary of Potential Enforcement Options

These violations may subject you to additional enforcement by the San Diego Water Board or State Water Resources Control Board, including a potential civil liability assessment of \$10,000 per day per violation (Water Code section 13385) and/or any of the following enforcement actions:

Other Potential Enforcement Options	Applicable Water Code Section
Technical or Investigative Order	Sections 13267 or 13383
Cleanup and Abatement Order	Section 13304
Cease and Desist Order	Sections 13301-13303
Time Schedule Order	Sections 13300, 13308

In addition, the San Diego Water Board may consider revising or rescinding applicable waste discharge requirements, if any, referring the matter to other resource agencies, referring the matter to the State Attorney General for injunctive relief, and/or referral to the municipal or District Attorney for criminal prosecution.

In the subject line of any response, please include the information located in the heading of this letter: "in reply refer to." Questions pertaining to this Notice of Violation should be directed to Erica Ryan at (619) 521-8051 or Erica.Ryan@waterboards.ca.gov.


 Laurie Walsh, P.E.
 Senior Water Resource Control Engineer
 Storm Water Management

LAW:DTB:DB:ER

Attachments: Facility Inspection Report dated January 19, 2016 for inspections conducted on January 19, 2016, March 14, 2016, and March 21, 2016

Tech Staff Info & Use	
WDID	9 30C371094
SMARTS Place ID	SM-831425
Inspection IDs	202916, 202917, 202918
Violation IDs	9/22/15: 857981 (BMP) 1/19/16: 860168 (Discharge), 860169 (BMP), 860170 (SWPPP) 3/14/16: 860171 (BMP), 860172 (SWPPP) 3/21/16: 860173 (BMP), 860174 (SWPPP)
Enforcement ID	423103