NPDES Compliance Inspection Report

Tree Farm
North Bend, Washington

Washington State Department of Ecology
Construction Stormwater General Permit
Permit # WAR309272

Inspection Date: December 16, 2022

Prepared by:

Kyle Masters
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division,
Surface Water Enforcement Section

Inspector Signature/Date:

Masters, Jonathan	Digitally signed by Masters, Jonathan Date: 2023.02.28 13:56:38 -08'00'

Supervisor Signature/Date:

MICHELE JENCIUS	Digitally signed by MICHELE JENCIUS Date: 2023.02.28 14:01:51 -08'00'

Contents

I. Project Information

Project Name:	Tree Farm
Project Owner:	SSHI LLC, dba D.R. Horton 11241 Slater Avenue NE, Kirkland, WA 98033
Project Operator:	Aero Construction 3827 Bickford Avenue, Snohomish, WA 98290
Physical Address:	1085 & 1145 Maloney Grove Avenue SE, North Bend, WA 98045
Latitude and Longitude:	47.482292, -122.777352
SIC Code:	1794 – Excavation Work
NAICS Code:	238910 – Site Preparation Contractors
Operator Contacts:	Robert Bates, Project Superintendent Aero Construction Office Phone: (425) 334-0082 Steve Avril, Project Manager Earth Solutions NW, LLC Email: stevea@esnw.com
Owner Contacts:	Tony Brandolini, Land Development Project Manager Work Cell Phone: (425) 223-1331 Email: AJBrandolini@drhorton.com Clint Lucas, Division Vice President of Land Development Work Cell Phone: (425) 229-2802 Email: CBLucas@drhorton.com
Permit Number:	WAR309272
Receiving Water:	South Fork Snoqualmie River – Snoqualmie River – Snohomish River - Puget Sound

II. Inspection Information

Inspection Date:	December 16, 2022

Inspectors:	Kyle Masters, Inspector EPA Region 10, ECAD / SWES Jon Klemesrud, Inspector EPA Region 10, ECAD / FDDWES
Other Individual Present:	Charles Hackel Water Quality Program Washington State Department of Ecology
Arrival Time:	9:50 AM
Departure Time:	12:20 PM
Weather:	Mostly Sunny
Purpose:	Evaluate compliance with the requirements of the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES), and the State Waste Discharge General Permit for stormwater discharges associated with construction activity (Construction Stormwater General Permit or CGP).

III. Permit Information

The Tree Farm subdivision construction project (Tree Farm) is permitted under the State of Washington Department of Ecology's (Ecology) Construction Stormwater General Permit (CGP). The current version of the CGP became effective on January 1, 2021 and expires on December 31, 2025.

Mr. Jamie Waltier, representing Harbour Homes, LLC, submitted the initial permit application (notice of intent) for the project in June of 2020. They obtained coverage on July 15, 2020 and in November fell under the reissued CGP. According to Ecology's Permitting and Reporting Information System (PARIS), Mr. Waltier and Harbour Homes completely transferred permit coverage to Mr. Alan Paszek and SSHI LLC (D.R. Horton) with an effective date of December 30, 2020. Throughout, the permit tracking number remained WAR309272. These documents show the total area of soil disturbance over the life of the project at 16.29 acres, out of a total site area of 17.91 acres. The permit coverage transfer letter estimated the project completion date of December 30, 2022.

IV. Background

According to the Stormwater Pollution Prevention Plan (SWPPP), the Tree Farm project consists of 58 residential lots in a new housing development. Project operators, in accordance with the SWPPP, designed the site to infiltrate most runoff during construction. During initial clearing,

grading and site development, the site utilized three sediment ponds for infiltration. The project shifted to using individual house lots as temporary settling ponds. Both controls allow stormwater to infiltrate. Operators pump extra runoff into the engineered infiltration basin that runs along the center of the site, which they constructed after the initial period of heavy earth moving. The SWPPP notes runoff generally flows south to north along a preexisting drainage channel for approximately two thirds of the site. The SWPP also notes runoff from the western third of the site generally sheet flows off-site to adjacent properties, flowing to the west.

Proposed construction activities over the life of the project includes site preparation, clearing and grading activities, associated underground utilities, excavation for building foundations, poured concrete foundations, concrete sidewalks, and asphalt paving for residential streets within the development. Actual housing unit construction would follow the utilities and neighborhood amenities. See **Attachment A** for a satellite image overview of the site's layout.

While researching Tree Farm in PARIS, I discovered their April Discharge Monitoring Reports (DMRs) listing a discharge with a turbidity reading of 509 Nephelometric Turbidity Units (NTUs) on April 4, 2022. I asked Mr. Hackel for a copy of Environmental Report Tracking System (ERTS) report stemming from the highly turbid discharge. He supplied ERTS #713990 on December 12, 2022. According to the ERTS, Tree Farm's CESCL contractor, Ms. Marley Adams of Earth Solutions NW, reported the discharge occurred at approximately 10:00 a.m., and collected the highly turbid sample at 11:45 a.m. on Monday, April 4. They notified Ecology of the discharge at 8:20 p.m. on Tuesday, April 5, approximately 34 hours after the discharge.

On December 13, 2022, I emailed the City of North Bend contact listed in the ERTS and asked about impacts from the discharge. Mr. Bryan Tucker, of North Bend, stated in an email they issued a stop work order to Tree House due to the discharge event. He characterized it as a pond blowout that quickly overcame the on-site BMPs and led to minor flooding of a neighboring residential development. Most of the discharge infiltrated through the other neighborhood's bioretention swales. North Bend staff said the Tree Farm project's Certified Erosion and Sediment Control Lead (CESCL) sampled and recorded the results from one of these swales as the actual discharged ended prior to the CESCL's arrival on-site.

V. Inspection Chronology

On December 12, 2022, along with Mr. Klemesrud and Mr. Hackel, I attempted to conduct an unannounced compliance evaluation inspection (CEI) of the Tree Farm site. We arrived at approximately 12:00 p.m. and found the site fenced-off with locked gates. We walked the street-wards (eastern) perimeter of the site and took photos of our observations (**Photos 1-6**). We observed approximately four uncovered soil stockpiles (**Photos 1-2**). We also saw some silt fence badly frayed and torn along the north perimeter (**Photo 6**).

We saw a fuel truck visit the site. The driver unlocked the gate, drove inside the site, and filled up the project's on-site fuel storage and dispensing truck. As the driver left, I asked him about the site. He told me the site had been quiet for a few weeks, but he had access and made regular stops. After the fueler left, I called the phone number for Mr. Paszek listed on the transfer of coverage letter. Then I called Mr. Dustan Windrick, listed as the "Developers Contact" on the

posted Notice of Proposed Construction Activity located at the site (**Photo 3**). I failed to reach either, and though I left voicemails, I did not receive a return call. We left the site at approximately 12:50 p.m.

On December 13, I spoke with Mr. Clint Lucas, Division Vice President of Land Development at D.R. Horton. He told me he assumed many of Mr. Paszek's duties while Mr. Paszek was away on leave. He also said Mr. Windrick left the company. He agreed to my request to open the site for an inspection, and we agreed to meet on the morning of Friday, December 16.

Mr. Klemesrud, Mr. Hackel, and I arrived at Tree Farm front gate at 9:50 am. We met with:

- Mr. Tony Brandolini, Land Development Project Manager at D.R. Horton
- Mr. Daniel Merlino also of D.R. Horton
- Mr. Robert Boles of Aero Construction
- Mr. Steve Avril of Earth Solutions NW
- Mr. Daniel Devine of Earth Solutions NW

Both Mr. Klemesrud and I presented our inspector credentials to Mr. Brandolini. Mr. Brandolini and other site representatives accompanied us throughout the inspection, though Mr. Brandolini left at approximately 11:30 a.m. for another engagement. Site representatives granted access to the site.

I began the inspection with an opening conference to discuss the Tree Farm project, and the CGP. I conducted an initial records review. I stated I would request electronic copies of the required records after the site walkthrough, and Mr. Brandolini stated he understood and would make the documents available. I toured the project, walking the site perimeter, and held a closing conference with Mr. Boles, Mr. Merlino, and the others above.

VI. Opening Conference

Mr. Brandolini confirmed Mr. Windrick left the company, and Mr. Paszek stepped away in July for an extended leave of absence. Mr. Brandolini also said this inspection represented only his second visit to Tree Farm site. He told us Aero Construction served as the project's primary operators, responsible for the clearing and grading, utility installation, and visible improvements to date. He explained D.R. Horton primarily stays in the vertical construction sector, i.e., home building, as opposed to performing the horizontal construction work, i.e., clearing and underground utilities. He said D.R. Horton typically contracts those phases of development to other companies.

Mr. Boles confirmed he served as project superintendent, with responsibilities including preparing the site for house construction by placing the utilities, and maintaining stormwater BMPs, and other day-to-day responsibilities. He said he took over the site from another Aero Construction project superintendent in August. He also told us they put in most of the neighborhood streets in October, and that Tree Farm went relatively inactive around Thanksgiving due to a combination of weather, illness, and using leave. He said the applied fresh hydroseeding in November. Mr. Brandolini confirmed that Mr. Boles and Aero

Construction would make any necessary corrections stemming from this inspection, and that they responded to BMP maintenance needs identified by weekly CESCL inspections. Mr. Devine and Mr. Avril stated they, usually Mr. Devine, perform the weekly site inspections. Mr. Devine confirmed his status as a trained CESCL.

Mr. Brandolini confirmed DR Strong Consulting provided engineering design for the BMPs used on-site, including the final infiltration system, and they prepared the SWPPP. He said DR Strong Consulting performed this work for the initial development company, Harbour Homes, and when D.R. Horton purchased the site, the plan came with the site.

At the end of the opening conference, I conducted an initial records review and confirmed site owners and operators retained copies of these documents on-site:

- Permit coverage and transfer of coverage letter
- The construction stormwater general permit
- Site Map (**Photo 7**)
- SWPPP (cover page – **Photo 8**)
- Site Log Book with accumulated weekly inspection records (cover page of 12/09/22 inspection – **Photo 8**).

VII. Site Review

We began our tour of the construction site near the main entrance, along Mahoney Grove Avenue. We followed a counterclockwise pattern, moving from the northeast corner to the northwest, southwest, staging ground, then back to the entrance. **Attachment B** contains photographs taken during the site walk-through and a complete photo log. The site appeared well vegetated since they hydroseeded less than two months prior to the inspection. Additional BMPs observed included perimeter silt fencing, stabilized construction entrance feeding the staging ground only, temporary ponds, straw wattles and mulch, rock check dams, and riprap channel lining. Mr. Brandolini, Mr. Boles, Mr. Avril, Mr. Devine, and Mr. Merlino accompanied us on the site walk, until Mr. Brandolini's departure.

At the northwest corner, and main paved site entrance, we noticed the same silt fence in Photo 6; it still looked frayed, collapsed, and in need of repair (**Photo 10**). Continuing west along the perimeter we saw an installed bioswale and noted the berms outlining future housing lots, helping with stormwater control and infiltration (**Photos 11-12**). We also saw the operator draining stormwater from a lot on the central paved area and nearby bioswale, which drains into the northern bioswale and potential outfall, with check dams (**Photos 13-16**).

We then saw where Tree Farm will connect to the northerly neighboring development in the future. The April 2022 discharge event occurred at this outfall, Mr. Boles confirmed for us. We saw installed silt fence and sandbags (**Photo 18**). Further west, we observed a drainage channel, with straw mulching, between the lot berms and the edge of the site (**Photo 19**). Turning south along the western perimeter, we saw additional silt fencing; at the northwestern-most lots we saw the drainage path mention above leading to a catch basin (**Photos 20-21**).

Further south, in an area below grade most of Tree Farm, we saw some silt fence, retaining walls, and rip-rap drainage channel mixed with natural woody growth (**Photos 22-23**). Mr. Boles told us this part of Tree Farm lay in a designated FEMA floodplain.

Turning back east, along the southern perimeter, we saw noticeable signs of erosion along a concrete wall, with flow apparently into the floodplain (**Photo 24**). Mr. Boles told us this appeared new. Continuing east we saw more lots temporarily holding stormwater, silt fencing along the perimeter, and we saw an unworked, uncovered soil stockpile (**Photos 25-26**). Further east we saw a temporary swale for inflow drainage, and the permanent bioswale along the middle-southern portion of the site containing check-dams that will aid in future infiltration at Tree Farm (**Photos 27-30**).

Next, at the southeast portion of Tree Farm, we inspected the staging ground, also referred to as the laydown area, portion of the site. We observed a small concrete washout area, with the perimeter partly reinforced with wattle and sandbags. We noted the same uncovered soil stockpiles from our December 12 site visit behind this area (**Photo 31-33**). We observed the on-site fuel truck, described above, water truck, approximately five excavators of various sizes, and a large dump truck staged in the area (**Photos 33-34**). We did not observe a spill kit near these trucks, though Mr. Boles told us they keep some spill response equipment, namely spill absorbent pads, inside the fuel truck. Closer to the concrete washout area, but showed in the foreground of **Photo 34**, we saw a portable sanitation facility. It appeared unsecured.

We also observed two pallets holding weathered chemical materials in this area. On one pallet we saw seven containers ranging in size from 55-gallon drum to 5-gallon pail, to one-pint can holding a variety of oils and paints (**Photos 35-37**). We did not see any spill response equipment, over head coverings, or other pollution control devices in this area. In the background of **Photo 35**, we also saw a second pallet holding many, approximately 40-pound, bags of bentonite and ready-mix concrete. The bags appeared sealed from the wholesaler/retailer, but also appeared weathered and lacking containment.

VIII. Records Review

As noted above, I spot-checked the presence of CGP required documents while on-site. After the inspection, I emailed Mr. Lucas and requested the below records for detailed review. Site contacts provided these records by December 19, including site inspection reports for the history of the project:

- Stormwater Pollution Prevention Plan (SWPPP) – During the inspection, I noted the SWPPP contained references to Harbour Homes LLC, and named Jamie Waltier in the Pollution Prevention Team. The plan also contains an inaccurate, no longer in service, telephone number for the Department of Ecology.
- Site Map – The map in the SWPPP did not appear to show all BMPs used on-site.
- Site Log Book (including: site inspections, stormwater monitoring, BMP maintenance history) – Inspection reports reviewed on-site did not include thorough history and explanations for BMP maintenance.

- All notifications sent to Ecology regarding the April storm event and discharge.

IX. Areas of Concern

I identified the following areas of concern from observations made before and during the inspection:

A. Site Operators and Permit Coverage

Section S1.B *of the permit states: "Operators of the following construction activities are required to seek coverage…(c)learing, grading, and/or excavation that results in the disturbance of one or more acres…"*
Appendix A – Definitions*: "Operator means any party associated with a construction project that meets either of the following two criteria: (t)he party has operational control over the construction plans and specifications, including the ability to make modifications to those plans and specifications…(t)he party has day-to-day operational control of those activities at a project that are necessary to ensure compliance with the SWPPP for the site or other permit conditions…"*

1. During the inspection, Mr. Brandolini told us our inspection represented his second visit to the site. He told us Mr. Boles and Aero Construction performed the clearing and grading at the site. Mr. Boles also told us he was responsible for following up with BMP maintenance and agreed that he and Aero Construction performed the clearing and grading activities. According to PARIS, Aero Construction lacks permit coverage at the Tree Farm site.

B. High Turbidity Reporting Requirement

Section S5.A *of the permit states: "Anytime sampling performed in accordance with Special Condition S4.C indicates turbidity has reached the 250 NTUs or more…the Permittee must notify Ecology within 24 hours of analysis either by calling…or by submitting an electronic ERTS report."*
Section S5.F *states: "In the event the Permitee is unable to comply with any part of the terms and conditions of this permit…or exceed numeric effluent limitations…the Permittee must…(n)otify Ecology within 24 hours of the failure to comply…"*

1. After the April 4, 2022 high turbidity discharge event, which occurred at approximately 10:00 a.m., the Permittee failed to notify Ecology until April 5, 2022 at 8:20 p.m.

C. Discharge Monitoring Reports

Section S5.B of the permit states: "Permittees required to conduct water quality sampling…must submit the results to Ecology…(they) must submit monitoring data using Ecology's WQWWEBDMR web application…Permittees must submit DMR forms to be received by Ecology within 15 days following the end of each month.

1. The Permittee submitted the May 2022 DMR on July 13, 2022.
2. The Permittee submitted the July 2022 DMR on August 30, 2022.
3. The Permittee submitted the October 2022 DMR on November 21, 2022.

D. General SWPPP Requirements

Section S9.B *of the permit states: "The Permittee must modify the SWPPP whenever there is a change in design, construction, operation, or maintenance at the construction site that has, or could have a significant effect on the discharge of pollutants to waters of the State.*

1. The on-site SWPPP review found it listed Mr. Waltier of Harbour Homes LLC as a member of the site's Pollution Prevention Team and Emergency Permittee Contact.

2. The on-site SWPPP review also found an inaccurate, out of date, telephone number listed for the Department of Ecology's Northwest Regional Office.

E. BMP Installation and Maintenance

Section S3.C.2. *of the permit states: "Implement stormwater BMPs contained in stormwater management manuals published or approved by Ecology, or BMPs that are demonstrably equivalent to BMPs contained in stormwater management manuals published or approved by Ecology, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs for on-site pollution control."*
Section S9.D.11.2 *states: "Permittees must maintain and repair all temporary and permanent erosion and sediment control BMPs as needed to assure continued performance of their intended function in accordance with BMP specification.*

1. During the inspection we observed a portion of silt fence in need of repair (**Photos 6, 9**). On-site BMP inspection reports noted the deficiency.

2. The temporary below-grade concrete washout area's plastic liner lacked securing and failed to line the entire surface area of the washout (**Photo 31**).

F. Stabilize Soils

Section S9.D.5.a *of the permit states: "The Permittee must stabilize exposed and unworked soils by application of effective BMPs that prevent erosion. Applicable BMPs include…plastic covering…"*
Sections S9.D.5.e-f *state: "The Permittee must stabilize soils at the end of the shift before a holiday or weekend…The Permittee must stabilize soil stockpiles from erosion, protected with sediment trapping measures…"*

1. On both December 12 and 16 we observed approximately five unworked stockpiles lacking stabilization (**Photos 1-3, 25, 31-33**).

E. Control Pollutants

Section S9.D.9-. b *of the permit states: "Design, install, implement and maintain effective pollution prevention measures to minimize the discharge of pollutants. The Permittee must: (h)andle and dispose of all pollutants…including waste materials…that occur on site…(p)rovide cover, containment, and protection from vandalism for all chemicals, liquid products, petroleum products, and other materials that have the potential to pose a threat to human health or the environment. Minimize storage of hazardous materials on site.* ***Section S9.D.c*** *states: "Conduct maintenance, fueling, and repair of heavy equipment and vehicles using spill prevention and control measures."*

1. During the inspection we observed two pallets holding weathered chemical materials stored without cover, spill response equipment, or other controls (**Photos 35-37**). These materials included oil, paints, and bentonite and ready-mix concrete.

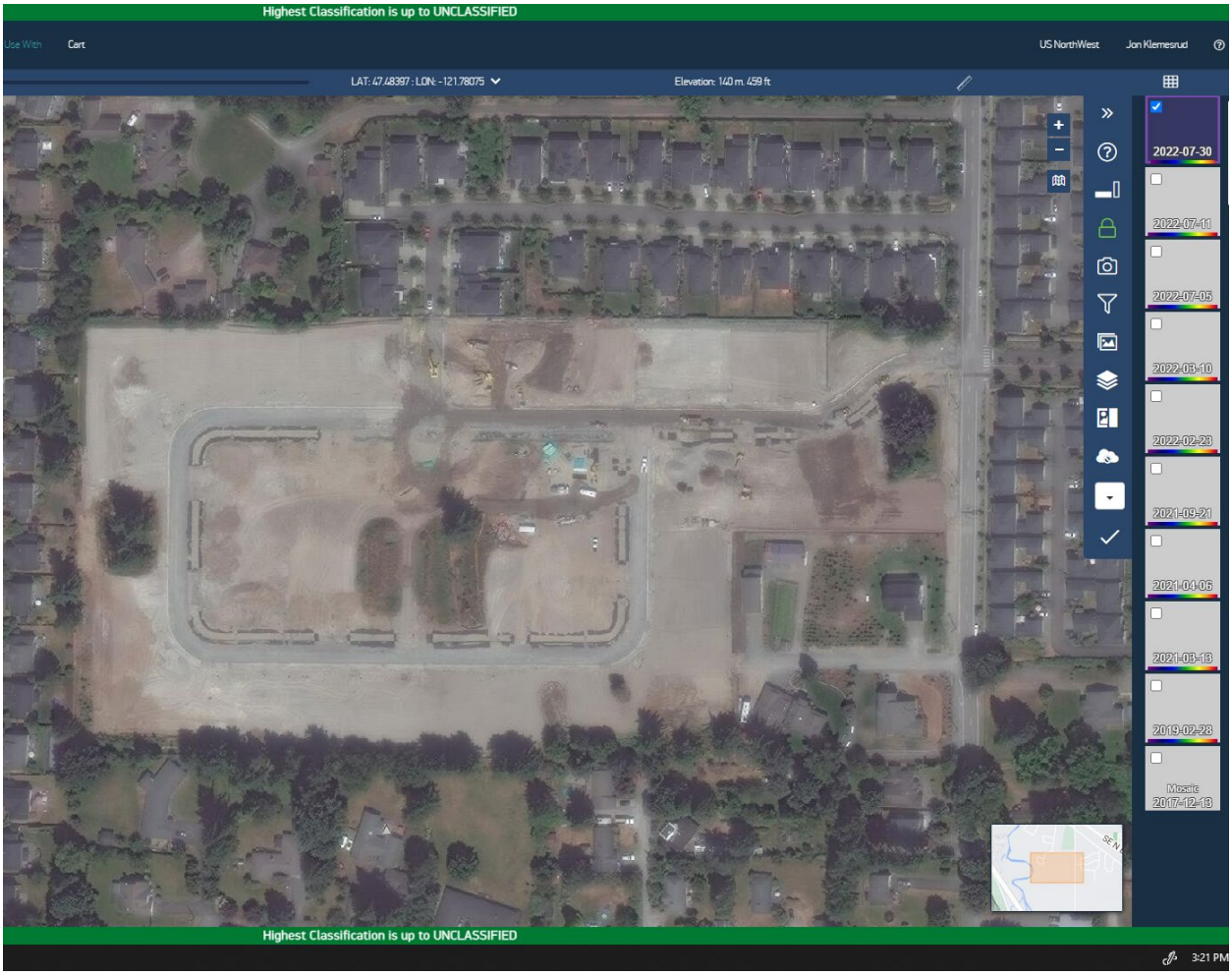
2. The portable on-site sanitation facility appeared unsecured (**Photo 34**).

3. The staging ground, or laydown area, where we saw a fuel truck and multiple heavy excavation machines lacked appropriate spill response measures, such as a dedicated oil and fuel spill kit (**Photos 31-34**).

X. Closing Conference

We held a closing conference with Mr. Boles, Mr. Avril, Mr. Merlino, and Mr. Devine. We discussed the areas of concern identified during the inspection and thanked them for their time and assistance. We departed Tree Farm at approximately 12:20 p.m.

ATTACHMENT A – Satellite Image



Satellite imagery of the Tree Farm project from Digital Globe dated July 30, 2022.

ATTACHMENT B – Photograph Log

(Photographs taken by Jon Klemesrud on December 12 and 16, 2022 with a Nikon Coolpix AW100 camera)

Photo 1

Photo 2

Photo 3

Photo 4

Photo 5

Photo 6

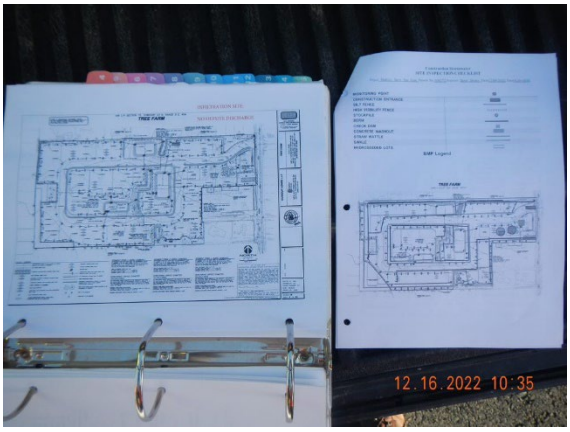


Photo 7

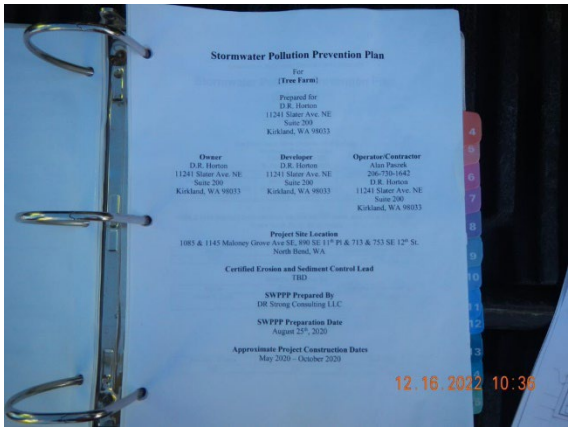


Photo 8

Photo 9

Photo 10

Photo 11

Photo 12

Photo 13

Photo 14

Photo 15

Photo 16

Photo 17

Photo 18

Photo 19

Photo 20

Photo 21

Photo 22

Photo 23

Photo 24

Photo 25

Photo 26

Photo 27

Photo 28

Photo 29

Photo 30

Photo 31

Photo 32

Photo 33

Photo 34

Photo 35

Photo 36

Photo 37

Photo Number	Digital Image Number	Description of Digital Image	Date and Time	
			Digital Image Taken	
Photo 1	DSCN2954.JPG	Facing north, photo of eastern perimeter along Malone Grove Ave SE	12/12/2022	12:29 PM
Photo 2	DSCN2955.JPG	Facing west, photo of southern perimeter from Malone Grove Ave SE	12/12/2022	12:30 PM
Photo 3	DSCN2956.JPG	Facing west, photo of City of North Bend project signage from Malone Grove Ave SE	12/12/2022	12:30 PM
Photo 4	DSCN2957.JPG	Facing west, photo of area south of the paved construction access from Malone Grove SE	12/12/2022	12:31 PM
Photo 5	DSCN2958.JPG	Facing south, photo of eastern perimeter along Malone Grove SE	12/12/2022	12:31 PM
Photo 6	DSCN2959.JPG	Facing west, photo of northern perimeter from Malone Grove SE	12/12/2022	12:34 PM
Photo 7	DSCN3066.JPG	Photo of SWPPP Site Map & BMP Legend	12/16/2022	10:35 AM
Photo 8	DSCN3067.JPG	Photo of SWPPP Cover Page	12/16/2022	10:36 AM
Photo 9	DSCN3068.JPG	Facing west, photo of northern perimeter from Malone Grove Ave SE	12/16/2022	10:46 AM
Photo 10	DSCN3069.JPG	Facing west, photo of northern perimeter west of Malone Grove Ave SE	12/16/2022	10:48 AM
Photo 11	DSCN3070.JPG	Facing south, photo of north/northeast bioswale from northern perimeter	12/16/2022	10:51 AM
Photo 12	DSCN3071.JPG	Facing west, photo of northern perimeter and overflow catch basin to primary swale/outfall location.	12/16/2022	10:53 AM
Photo 13	DSCN3072.JPG	Facing south, photo of temporary lot drainage to central paved area.	12/16/2022	10:57 AM
Photo 14	DSCN3073.JPG	Facing north, photo of northern bioswale and potential outfall area	12/16/2022	10:58 AM
Photo 15	DSCN3074.JPG	Facing east, photo of check damn and drainage area within northern bioswale	12/16/2022	11:00 AM
Photo 16	DSCN3075.JPG	Facing northeast, photo of check dam and drainage area within northern bioswale	12/16/2022	11:01 AM
Photo 17	DSCN3076.JPG	Facing north, photo of sandbag diversion and silt fence bmp between adjacent neighborhood access road	12/16/2022	11:06 AM
Photo 18	DSCN3077.JPG	Facing north, photo of sandbag diversion and silt fence bmp between adjacent neighborhood access road	12/16/2022	11:06 AM
Photo 19	DSCN3078.JPG	Facing west, photo of northwest perimeter and associated drainage channel.	12/16/2022	11:09 AM
Photo 20	DSCN3079.JPG	Facing south, photo of western perimeter and silt fencing/berming BMPs	12/16/2022	11:12 AM
Photo 21	DSCN3080.JPG	Facing northwest, photo of northwest lot drainage/overflow	12/16/2022	11:13 AM
Photo 22	DSCN3081.JPG	Facing south, photo of FEMA floodplain area along western	12/16/2022	11:15 AM

		perimeter		
Photo 23	DSCN3082.JPG	Facing north, photo of FEMA floodplain area along western perimeter	12/16/2022	11:19 AM
Photo 24	DSCN3083.JPG	Facing west, photo of southwest perimeter, minimal erosion observed along concrete wall	12/16/2022	11:21 AM
Photo 25	DSCN3084.JPG	Facing north/northeast, photo of stockpile near southern perimeter	12/16/2022	11:24 AM
Photo 26	DSCN3085.JPG	Facing east, photo of southwest perimeter	12/16/2022	11:25 AM
Photo 27	DSCN3086.JPG	Facing east, photo of inflow drainage	12/16/2022	11:27 AM
Photo 28	DSCN3087.JPG	Facing north, photo of southeast perimeter silt fencing bmp	12/16/2022	11:31 AM
Photo 29	DSCN3088.JPG	Facing north, photo of inflow drainage/bioswale	12/16/2022	11:35 AM
Photo 30	DSCN3089.JPG	Facing north/northeast, photo of primary/inflow drainage bioswale	12/16/2022	11:37 AM
Photo 31	DSCN3090.JPG	Facing southeast, photo of concrete washout area, stockpiles in the background.	12/16/2022	11:43 AM
Photo 32	DSCN3091.JPG	Facing west, photo of southeast perimeter and sand stockpile	12/16/2022	11:47 AM
Photo 33	DSCN3092.JPG	Facing west, photo of stockpiles and material storage area	12/16/2022	11:49 AM
Photo 34	DSCN3093.JPG	Facing north/northeast, photo of machine/equipment staging ground area	12/16/2022	11:51 AM
Photo 35	DSCN3094.JPG	Facing west, photo of material/product storage area	12/16/2022	11:56 AM
Photo 36	DSCN3095.JPG	Photo of drum with Tellus Oil 32 hydraulic oil label	12/16/2022	11:57 AM
Photo 37	DSCN3096.JPG	Photo of material/product storage area	12/16/2022	11:57 AM

NOTE: The date stamps on Photos 1-6, From December 12, are an hour later than actual time.