



NPDES Compliance Inspection Report

Ridgefield Heights Ridgefield, Washington

NPDES Permit Tracking Number
WAR306634

Inspection Date: 12/20/2022

Prepared by:

Jon Klemesrud
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Field, Data & Drinking Water Enforcement Section

Inspector Signature/Date:

JON KLEMESRUD

Digitally signed by JON KLEMESRUD
Date: 2023.02.02 09:32:02 -08'00'

Supervisor Signature/Date:

PETER CONTRERAS

Digitally signed by PETER CONTRERAS
Date: 2023.02.02 12:43:46 -08'00'

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[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Cole Conley, Mr. Aaron Searcy, Mr. Kieran Rotschy or from observations made during the inspection.]

I. Project Information

Project Name: Ridgefield Heights

Project Location: 26315 Northwest 51st Ave
Ridgefield, Washington 98642

Latitude/Longitude: 45.8103218078613 -122.720611572266

NPDES Tracking Number: WAR306634

Project Nature: New residential construction, five phase development of a residential subdivision.

Owner/Operator/Permittee: Lennar Northwest, LLC
(Transferred 10/24/2022) 11807 NE 99th St. Suite 1170
Vancouver, Washington 98682
(Responsibilities include owner and operational control over project plans and specifications)

Represented on-site by: Cole Conley, Division Environmental Manager
Lennar Northwest, LLC
cole.conley@lennar.com (360) 907-1730

Owner Contact: Ryan Selby
Lenna Northwest, LLC
ryan.selby@lennar.com (360) 258-7900
(855) 694-7600

Contractor #1: AKS Engineering & Forestry, LLC
9600 NE 126th Avenue, Suite 2520
Vancouver, Washington 98682
(Responsibilities include current CESCL, was conducting site inspections and CESCL duties for Phase 1-2 at the time of inspections. SWPPP developer)

Represented on-site by: Aaron Searcy, CESCL
AKS Engineering & Forestry, LLC
searcy@aks-eng.com (360) 882-0419 ext. 330

Contractor #2: Rotschy, Inc.
 7408 NE 113th Circle
 Vancouver, Washington 98662
(Prior land development contractor, was conducting installation and maintenance of BMPS's at the time of inspection. Conducting site inspections and CESCL duties for Phase 3-5 at the time of inspection)

Represented on-site by: Kieran Rotschy, Foreman
 Rotschy, Inc.

Contractor #2: Shawn Salisbury, CESCL
 (Additional contact) Rotschy, Inc.

Estimated Project Start Date: May 1, 2018

Estimated Completion Date: May 25, 2023

Total Project Size: 64.4 acres

Total Disturbed Area: 49 acres

Receiving water(s): Gee Creek

II. Inspection Information

Inspection Date: December 20, 2022

Inspector(s): Jon Klemesrud, Inspector
 EPA Region 10, ECAD / FDDWES

Other individuals present: Brian Johnson
 Washington State Department of Ecology
 Water Quality, Southwest Regional Office
 Brjo461@ecy.wa.gov

Jacob Neuharth
 Washington State Department of Ecology
 Water Quality, Southwest Regional Office
Janc461@ecy.wa.gov

Other individuals present: Joeseeph McCord
 Washington State Department of Ecology
 Water Quality, Southwest Regional Office
 mcjo461@ecy.wa.gov

Arrival Time: 10:30 AM

Departure Time: 01:26 PM

Weather: Rain, 44 degrees (°F)

Purpose: To 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.

III. Permit Information

The Ridgefield Heights construction project (hereinafter referred to as the “Ridgefield Heights”) is permitted under the State of Washington Department of Ecology’s Construction Stormwater General Permit (CGP). The permit tracking number assigned to the project is WAR306634.

The current version of the CGP became effective on January 1, 2021 and is due to expire on December 31, 2025. The project also had coverage under the previous version of Ecology’s CGP which expired on December 31, 2020.

Based upon my review within Washington Department of Ecology’s Permitting and Reporting Information System (PARIS), the initial permit application (notice of intent) for the construction project was submitted by Mr. Ryan Cain, representing a prior owner/operator (OCD Ridgefield Heights LLC). The effective date of the project’s permit coverage was June 4, 2018. Permit coverage was renewed by Mr. Cain on August 8, 2020, in advance/conjunction of the renewed CGP.

On June 1, 2021, permit coverage was transferred to new/current owner Lennar Northwest, LLC. represented by Mr. Ryan Selby. Permit coverage was subsequently transferred to operator/land developer, Rotschy, Inc. on September 2, 2021. On October 24, 2022, permit coverage was transferred back to owner Lennar Northwest, LLC. See **Attachment A**, Signed ECY 020-87a Permit Transfers.

IV. Project Background

According to the project’s Stormwater Pollution Prevention Plan (SWPPP), Ridgefield Heights is a new housing development consisting of residential lots and associated infrastructure. The project includes both land development and vertical construction (home building). Phases 1-2 of the project includes the development and construction of 100 single family residences, Phases 3-5 of the project includes the development and construction of the remaining 77 lots/residences.

For land development, construction activities over the life of the project includes initial site preparation and best management practices (BMPs) installations, clearing, grubbing, demolition, mass earthwork, wet utilities (sewer, storm, roads), roads (curb, paving, sidewalks), dry utilities (power, phone, cable, gas, internet), common amenities (fencing landscaping, parks, monumentation), and temporary stabilization.

For vertical construction, construction activities over the life of the project include initial BMP installation (construction entrance and perimeter controls); foundation excavation and concrete pouring, utility connections and temporary stabilization; initial home construction (framing, siding, roofing, and rough-in trade work); foundation backfill, grading, and temporary stabilization; internal and external housing components, final stabilization and removal of temporary stabilization measures; and close of escrow (conveyance to customer).

At the time of inspection, land development and all infrastructure work were generally complete for Phases 1-2. Land development including grading activities and installation of BMP's were in progress for Phases 3-5. According to the SWPPP, construction is estimated to be completed in December of 2024.

The property is primarily surrounded by rural residential residences to the south, east, and west. Properties to the north consist of forested areas, wetlands, and brush. Topographically the site is moderately sloped with rolling hills directing drainages to the northeast, south and southwest. An unnamed stream (tributary to Gee Creek) exits to the north of the project, and Gee Creek exits to the south/southwest.

According to the SWPPP, prior to land development, vegetation on the site consisted of grassy fields with brush and forested areas located on the northern portion of the property.

Stormwater runoff during construction is designed to be either infiltrated or conveyed to three engineered stormwater ponds (Pond A, Pond B, and Pond C). Stormwater entering the ponds are designed to either infiltrate/evaporate or overflow/discharge to tributaries of Gee Creek.

For a general construction footprint, see **Attachment B**, Ridgefield Heights Vicinity Map, and **Attachment C**, Site Plans.

According to PARIS, Ecology issued two Field Notice of Penalty's to the project's prior operator/permittee, Rotschy, Inc. A \$2,000 citation was issued on November 24, 2021 and a \$3,000 citation was issued on July 7, 2022. The Field Notice of Penalty's cited failure to implement and maintain best management practices (BMPs), polluting waters of the state and failure to submit discharge monitoring reports (DMRs).

The project was last inspected by Ecology on August 3, 2022, while permit coverage was held by Rotschy, Inc. The inspection report noted two compliance concerns, including exposed/unworked soil throughout the site and down/buried silt fencing.

As indicated earlier in this report, Permit coverage was transferred back to the current permittee/operator/owner, Lennar Northwest, LLC on October 24, 2022.

V. Inspection Chronology

This was an unannounced inspection. At approximately 8:45AM on the day of the inspection, I first attempted to contact Ryan Selby of Lennar NW LLC. Mr. Selby is listed as the current operator/permittee on the project's recent Notice of Transfer (NOT). The contact phone number listed on the NOT directed me to an automated Lennar NW directory where I was unable to locate Mr. Selby. I subsequently called and spoke to Scott Caleen of Lennar NW LLC, the "on-site contact" listed on the NOT. Mr. Caleen discussed that that he was no longer assigned to the project and provided me with the contact information for Cole Conley, Division Environmental Manager with Lennar NW LLC.

I proceeded to call and speak with Mr. Conley, I introduced myself and discussed that I had been asked to conduct an on-site compliance inspection at the Ridgefield Heights construction project in coordination with WA Ecology. I explained that the inspection would include a walk-through of the construction site and a review of permit related documents. Mr. Conley agreed to travel to the project site, and we agreed to meet for the inspection at 10:30AM.

I was joined on the inspection by Ecology representatives Brian Johnson, Jacob Neuharth and Joeseph McCord. Upon arrival to the site we met with Mr. Conley. Also present was Aaron Searcy of AKS Engineering & Forestry, LLC and Kieran Rotschy, Foreman of Rotschy, Inc. (the prior operator/permittee).

Following our initial introductions, I presented my EPA inspector credentials and re-stated the purpose and expectations of the inspection. I provided my business card and a copy of EPA's Small Business Resources Information Sheet. We then had a brief discussion regarding the project's general timeline and recent activities since taking over as the permittee approximately two months prior.

Mr. Searcy explained that he was current contracted Certified Erosion and Sediment Control Lead (CESCL) on the construction project and has been performing the recent site inspections ever since the recent permit transfer. Mr. Rotschy explained that his company was on-site that day to replace/repair a portion of the recently constructed sidewalk near the entrance to the site. Rotschy, Inc. was also conducting some best management practice (BMP) installation and maintenance at the time of inspection.

The on-site inspection consisted of an opening conference, a cursory review of the SWPPP, a walk-through of the construction site and concluded with a closing conference. During the closing conference, we discussed our inspection observations and next steps. The inspection team was accompanied throughout the inspection by both

Mr. Conley and Mr. Searcy. Mr. Rotschy was present for the opening conference and the initial portion of the walk-through before having to leave to address another matter.

Following the inspection, I received/reviewed electronic versions of the SWPPP and site inspection reports dating back to the last compliance inspection.

VI. Site Review

At the time of inspection, Mr. Conley explained that land development was generally complete for Phases 1-2. Lots within the two phases were about to go “vertical” and construction of the first home was scheduled to begin in approximately 3-4 weeks.

Mr. Searcy discussed that since starting on the project with the permit transfer in October, much of the work has been focused on installing additional BMPs to assist with overall site stabilization. Mr. Searcy highlighted recent stormwater activities included repairing engineered outfalls at Pond B and Pond C, as well as addressing some erosion/sloughing that was occurring to the north hillside at Pond A.

We began the tour of the construction site near the main entrance to Phases 1-2, along S. 10th Way. Photographs taken during the site walk-through are attached to this inspection report as **Attachment D**, Photograph Log. Mr. Conley discussed that for his own inspection records, he would take similar/duplicate photographs using his cell phone. Prior to beginning our walk-through, for a general site orientation I first viewed Mr. Searcy’s site map for Phases 1 & 2 (**Photo 1**).

At the time of inspection, areas near the construction entrance and areas along S. 10th Way (southern perimeter) appeared to be well vegetated after hydroseeded earlier in the year. No track-out was observed at the construction entrance. Straw wattles were observed to be staked along the southeast perimeter sidewalk (**Photo 2**). While standing at this is general location, we also viewed the area of sidewalk that was being repaired by Rotschy Inc. (**Photo 3**). Curb inlet catch basin covers were observed to be installed along S. 10th Way as a temporary BMP (**Photo 4**).

We continued the walk-through west toward Pond A along S. 10th Way. Pond A receives the majority of the stormwater for Phase 1 areas, as well as some smaller areas of Phase 2 and Phase 3. According to the SWPPP, Pond A discharges to a drainage ditch across S. 10th Way, a tributary to Gee Creek (Outfall 5).

We discussed the recent erosion/sloughing issue observed along the northern hillside of Pond A (**Photo 5**). According to Mr. Searcy, erosion control blankets/matting were recently installed on the north end slope of Pond A. Straw bales and conveyance piping were also installed above the pond to help prevent erosion and improve slope stability. Straw mulch was also added to the less vegetative areas. The recent BMP corrective actions were also documented in Mr. Searcy’s most recent site inspection report. See **Attachment E**, December 14, 2022, Site Inspection Report.

We then crossed S. 10th Way to view the outfall location from Pond A. Pond A was not discharging at the time of inspection. According to Mr. Searcy's site inspection reports, Pond A was discharging during his last site inspection on December 14, 2022. Turbidity was measured at 46.5 NTU and pH was 7.1.

Silt fencing was observed to be installed upslope of the discharge area, along the heavily vegetated tree line. While at this area, I observed a section of secondary/perimeter silt fencing where sediment was deposited above one-third the height of the section of silt fence (**Photo 6**). We were able to observe the Pond A discharge location more clearly from the south side of the silt fence (**Photo 7**).

At this time, Mr. Rotschy received a phone call and had to leave the inspection to attend to a separate matter. We continued the walk-through back across S. 10th Way to Pond A and observed the erosion/sloughing at the north end of Pond A (**Photo 8 & 9**). We then traveled north along a paved access road east of Pond and discussed some channeled erosion observed along the eastern side of the access road (**Photo 10**). We arrived at the north end of Pond A and observed the straw bales and conveyance piping that had been recently installed to assist with run-on to the northern hillside (**Photo 11 & 12**).

We then walked north toward the partially cleared areas of Phase 3 & 4, west of Phase 1 & 2 (**Photo 13**). We observed one area within Phase 3, east of S. 25th Place that was partially cleared, lacked stabilization, and had no perimeter BMPs (**Photo 14 & 15**). Just to the north was an area used as a construction entrance point off of S. 25th Place (**Photo 16 & 17**). Within this Phase 3 area we observed many areas with partially exposed soils.

According to Mr. Searcy, areas within Phase 3-5 were not included in his site inspections due to the existing contract between AKS Engineering & Forestry, LLC and Lennar Northwest, LLC. He believed that areas within Phase 3-5 were still being inspected by Shawn Salisbury of Rotschy, Inc. At this time, Mr. Searcy called Mr. Salisbury via phone and confirmed Rotschy, Inc. was continuing to inspect areas within Phases 3-5. Mr. Salisbury offered to provide his site inspection reports via email dating back to the previous Ecology inspection, which occurred in August 2022.

We continued the walk-through north and viewed Phases 3-5 (**Photo 18**). On the north side of S. 4th Way, we observed perimeter silt fencing extending north along the western perimeter, this area had yet to be cleared for development (**Photo 19 & Photo 20**). We continued northwest and viewed the northern perimeter silt fencing, northern stockpiles and the future location of the Phase 5 Culdesac (**Photo 21-23**).

We then traveled east to Pond B (**Photo 24**); Pond B generally serves the northwestern section of Phase 2 and discharges to a vegetative area above a tributary of Gee Creek (Outfall 2) via an engineered outfall/dispersion trench. While at Pond B, we observed stormwater traveling from the paved access road and entering Pond B as sheet flow. I observed some erosion along the southern hillside of Pond B.

As stated earlier in this report, according to Mr. Searcy, both the Pond B and Pond C outfalls were recently repaired. Mr. Searcy stated that prior to being repaired, the Pond B outfall was observed to be discharging via the hillside and causing some erosion and sediment to build-up within the silt fences down slope. Additional straw mulch and matting was added after the repair work was completed (**Photo 25**). No discharge was observed at Pond B at the time of inspection. Downslope of this outfall area, I observed silt fencing where sediment was deposited above one-third the height for all four sections/layers of silt fence.

We continued the walk-through east toward Pond C. Pond C generally serves the northeast section of Phase 2. Pond C discharges via an engineered outfall/dispersion trench to a vegetative area above a tributary of Gee Creek (Outfall 3). During our walk to Pond C, Mr. Searcy highlighted recent BMP additions including additional silt fencing within the Phase 2 area (**Photo 26 & Photo 27**).

Northwest of Pond C, we observed silt fencing and areas where straw mulch had been applied to hydroseeded areas, some areas also appeared to be less stabilized/vegetated (**Photo 28**). While at Pond C, we also observed stormwater traveling from the paved access road and entering Pond C as sheet flow. I observed some erosion along the southwest hillside of Pond C (**Photo 29**). We then viewed the Pond C outfall location; Pond C was not observed to be discharging at the time of inspection.

Mr. Searcy stated that prior to being repaired, similarly to Pond B the Pond C outfall was observed to be discharging via the hillside and causing some erosion and sediment to build-up within the silt fence down slope. Additional straw mulch and matting was added after the repair work was completed (**Photo 30**).

Following our time at Pond C, we traveled back to the main entrance to conclude the walk-through. During our walk, we observed one area of channelized erosion along the east side of S. 6th Way (**Photo 31**). Stormwater from this area was observed to be traveling downslope parallel to the paved road and entering a roadside catch basin discharging to Pond C.

Our walk-through concluded as we returned to our vehicles parked at the primary entrance.

VII. File Review

The following documents were reviewed as part of this inspection:

- Stormwater Pollution Prevention Plan (SWPPP) – A copy the SWPPP was brought to the inspection by Mr. Searcy and an electronic copy was provided post-inspection via email by Mr. Conley. The SWPPP was developed by AKS Engineering & Forestry, LLC with a preparation date of October 11, 2022. The SWPPP was prepared using Ecology's template and the contents aligned with the timing of the recent permit transfer to Lennar Northwest, LLC. According to Mr. Conley, the SWPPP was in the

process of being updated to define the scope of work of Lennar Northwest, LLC and Rotschy Inc. more clearly; and to describe the land development activities conducted by Rotschy Inc. in Phases 3, 4, and 5.

The SWPPP included the applicable 13 elements required/discussed in within Section S9.D. of the CGP and also referenced the Stormwater Management Manual for Western Washington for BMP selections observed during the on-site walkthrough.

- Site Inspections Reports – Dating back to the permit coverage transfer (October 24, 2022), weekly and post-storm event site inspection reports required by the permit were reviewed as part of this inspection. In general, site inspection reports were well documented and included corrective actions and associated remedial actions.

Site inspection reports completed by Mr. Searcy of AKS Engineering & Forestry, LLC were provided post-inspection via email. According to Mr. Searcy the inspections are completed using a software program called Stormpro®. The most recent inspection was documented six days prior to the inspection, on December 14, 2022 (**Attachment E**). Dates of all prior site inspections reports provided by Mr. Searcy include: 10/25/2022, 10/31/2022, 11/05/2022, 11/08/2022, 11/15/2022, 11/22/2022, 11/30/2022, 12/06/2022, 12/09/2022 and 12/14/2022.

According to Mr. Searcy's site inspection reports, Pond A was discharging during his last site inspection on December 14, 2022, turbidity was measured at 46.5 NTU. Pond B and Pond C were last documented discharging during Mr. Searcy's December 9, 2022 site inspection. According to the December 9, 2022 site inspection report, for all three ponds: "discharge was visibly the same as previous inspection done this week, therefore no sample was needed to be taken." The previous inspection occurred on December 6, 2022, at that time turbidity was measured at 59.8 NTU for Pond A, 122.0 NTU for Pond B, and 50.0 NTU for Pond C.

Site inspection reports completed by Mr. Shawn Salisbury of Rotschy Inc. were provided by Mr. Salisbury via email. Dates of the site inspection reports (since the transfer of coverage) include: 10/25/2022, 11/01/2022, 11/08/2022, 11/15/2022, 11/22/2022, 11/29/2022, 12/06/2022 and 12/13/2022.

- Discharge Monitoring Reports (DMRs): DMRs were reviewed as part of this inspection. DMRs were reviewed using Ecology's PARIS database.

The October 2022 DMR was submitted by Paul Hanson (Rotschy Inc.) on November 8, 2022 and stated "No Discharge" for "Outfall 5 – Gee Creek." The November 2022 DMR was submitted by Paul Hanson (Rotschy Inc.) on December 6, 2022 and stated "No Discharge" for "Outfall 5- Gee Creek."

At the time of this inspection report, the December 2022 DMR was submitted by Aaron Searcy on January 12, 2023 and reflected the data documented in his site

inspection reports. Including discharges from “Outfall 2 – Wetpond,” “Outfall 3 – Wetpond” and “Outfall 5 – Gee Creek.”

VIII. Areas of Concern

Observations during the inspection identified the following areas of concern:

A. Silt Fencing at Pond A & B Perimeter Outfalls

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.a of the permit 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 specifications.”

The Stormwater Management Manual for Western Washington (July 2019) lists maintenance standards for BMP C233 (Silt Fence) which includes: “Remove sediment deposits when the deposit reaches approximately one-third the height of the silt-fence, or install a second silt-fence.

As discussed earlier in this inspection report, at the time of inspection during the walk-through at Ponds A & B, secondary/tertiary silt fences had been installed as a BMP. Collected sediment was observed to be contained by silt fencing. however, I observed sections of perimeter silt fencing where sediment was deposited above one-third the height (**Photo 6, & Photo 25**). The concern is that the two areas of silt fencing was in needed of maintenance based upon the written standard.

Following the inspection, I received notice from Mr. Conley via an Inspection Response Letter (**Attachment F**) that the following had been completed:

- o On January 1, 2023, Lennar removed the collected sediment and maintained the silt fence located upslope of the Pond A discharge pipe. See photo No. 3b.
- o On December 27, 2022, Lennar removed the collected sediment and maintained the silt fence along the northeast corner of Pond B. See photo No. 13b.

B. Phase 3 Stabilization and Perimeter Controls

Section S9.D.4.e of the permit states that at a minimum, the Permittee must: “provide and maintain natural buffers around surface waters, direct stormwater to vegetated areas to increase sediment removal and maximize stormwater infiltration.”

Section S9.D.5.a of the permit states that at a minimum, the Permittee must: “stabilize exposed and unworked soils by the application of effective BMPs that prevent erosion.”

Section S9.D.11.a of the permit 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 specifications.”

The Stormwater Management Manual for Western Washington (July 2019) lists maintenance standards for BMP C121 (Mulching) which includes: “the thickness of the mulch cover must be maintained.” Table II.3.6. lists Straw mulch application rate as “2”-3” thick. 5 bales per 1,000 sf or 2-3 tons per acre.”

As discussed earlier in this inspection report, at the time of inspection during the walk-through at Phase 3, we observed one area east of S. 25th Place where a portion of the vegetated perimeter berm had been partially cleared and had no perimeter BMPs (**Photo 14**). The area adjacent to the partially cleared vegetative berm in Phase 3 lacked stabilization (**Photo 15**). Straw mulch was observed in some areas near the partially cleared vegetative berm as a BMP however, not to the 2” – 3” thickness application rate defined in the written standard. It was discussed that stabilization and perimeter BMPs in this area could be improved to prevent impacted stormwater from leaving this area and entering the roadside ditch along S. 25th Place.

Following the inspection, I received notice from Mr. Conley via an Inspection Response Letter (**Attachment F**) that the following had been completed:

- o On January 5, 2023, Lennar installed a perimeter straw wattle above the low point in Phase 3 at the break in vegetation.
- o On January 10, 2023, Lenna installed straw mulch stabilization to the area upslope of the low point in Phase 3. See photo No. 7b.
- o On January 10, 2023, Lennar installed straw mulch stabilization in Phase 3. See photo No. 18b.

C. Sheet Flow Impacting Slopes to Pond B and Pond C

Section S9.D.3.c of the permit states: if permanent infiltration ponds are used for flow control during construction, protect these facilities from sedimentation during the construction phase.

As stated earlier in this report, at the time of inspection during the walk-through at Pond B and Pond C, I observed stormwater traveling down from the paved access roads and entering the Ponds as sheet flow. Erosion was observed along the slopes where the sheet flow was entering. The concern is that the erosion could contribute to additional sediment entering the ponds.

Following the inspection, I received notice from Mr. Conley via an Inspection Response Letter (**Attachment F**) that the following had been completed:

- o December 29, 2022, Lennar installed a straw wattle at the top of slope along the entrance to Pond C, and installed ECM on the south slope of Pond C. See photo No. 15b.

D. Erosion Along Paved Footpath/Road Near Pond A

Section S9.D.3.c of the permit states: if permanent infiltration ponds are used for flow control during construction, protect these facilities from sedimentation during the construction phase.

As stated earlier in this report, at the time of inspection during the walk-through near Pond A, I observed some channelized erosion along the east side of the paved footpath/road near Pond A (**Photo 10**). The concern is that the erosion could contribute to additional sediment entering Pond A.

Following the inspection, I received notice from Mr. Conley via an Inspection Response Letter (**Attachment F**) that the following had been completed:

- o December 29, 2022, Lennar began installing silt fence and rock check dams on the upslope side of the walking path located above Pond A; and completed installations on January 6, 2023. See photo No. 5b.

E. Discharge Events Not Included in the November 2022 Discharge Monitoring Report

Section S5.B of the permit states: Permittees required to conduct water quality sampling in accordance with Special Conditions S4.C (Turbidity/Transparency), S4.D (pH), S8 (303[d]/TMDL sampling), and/or G12 (Additional Sampling) must submit the results to Ecology. Permittees must submit monitoring data using Ecology's WQWebDMR web application accessed through Ecology's Water Quality Permitting Portal.

As stated earlier in this report, when conducting the file review post-inspection, it was observed that the November 2022 DMR was submitted by Paul Hanson (Rotschy Inc.) on December 6, 2022 and stated "No Discharge" for "Outfall 5- Gee Creek." See **Attachment G**, November 2022 DMR.

When reviewing November site inspection reports completed by Aaron Searcy of AKS Engineering & Forestry, LLC, discharges were documented during the following inspection reports: November 5, 2022, November 8, 2022, November 22, 2022, November 30, 2022.

The concern is that the November discharges identified in the site inspection reports were not included in the permittee's DMR.

Following the inspection, I received notice from Mr. Conley on February 1, 2023, via an Inspection Response Letter (**Attachment F**). In the letter, Mr. Conley explained that the prior permittee (Rotschy, Inc.) had submitted the November DMR after transferring permit coverage on October 26, 2022. Upon me contacting Mr. Conley about this matter, Mr. Conley contacted Ecology's Information Technology Unit to retroactively submit Lennar NW, LLC's November 2022 DMR into PARIS. Ecology was unable to enter the November results, but suggested the documentation be attached to the December 2022 DMR note section or retained on-site.

- o On February 1, 2023, Lennar added the November 2022 discharge sampling data in the Ecology PARIS notes section for the Ridgefield Heights December 2022 DMR.

IX. Closing Conference

Following the walk-through, a closing conference was held with Mr. Conley and Mr. Searcy. We discussed our observations and the areas of concern A-D. I then thanked them for their time and cooperation with the inspection.

ATTACHMENT A

Signed ECY 020-87a Permit Transfer



Transfer of Coverage

Construction Stormwater General Permit

This form transfers permit coverage for all, or a portion of a site to one or more new operators.

Permit # WAR306634

001 25 2022

WATER QUALITY PROGRAM

Type of permit transfer (check one): ☐ Partial transfer (complete the Partial Transfer acreage below) ☒ Complete transfer

Specific date that permit responsibility, coverage, and liability is transferred to new operator: 10-24-22

*If no date is indicated Ecology will determine the date of transfer.

Please see instructions for details on type of transfer.

For PARTIAL TRANSFERS indicate the acreage remaining under your operational control:

- List total size of project/site remaining under your operational control following the partial transfer: _____ acres.
- List total area of soil disturbance remaining under your operational control following the partial transfer: _____ acres.
- Submitting this form meets the requirement to submit an updated NOI (General Permit Condition G9)

Current Operator/Permittee Information

Current Operator/Permittee Name: Drew Rotschy		Company: Rotschy Inc.		
Business Phone: 360-334-3100	Ext:	Mailing Address: 7408 NE 113th Cir		
Cell Phone: 360-518-8106	Fax (optional):			
Email: drewr@rotschyinc.com		City: Vancouver	State: WA	Zip+4: 98662
Signature* (see signatory requirements in Section VIII): 		Title: Vice President		Date: 10-11-2022

New Operator/Permittee Information

(the remainder of this form applies to the new Operator/Permittee)

I. New Operator/Permittee (Party with operational control over plans and specifications or day-to-day operational control of activities which ensure compliance with Stormwater Pollution Prevention Plan (SWPPP) and permit conditions. Ecology will send correspondence and permit fee invoices to the permittee on record.)				
Name: Ryan Selby		Company: Lennar NW Inc.		
Business Phone: 360-258-7900	Ext:	Unified Business Identifier (UBI): 603-137-683 (UBI is a nine-digit number used to identify a business entity. Write "none" if you do not have a UBI number.)		
Cell Phone (Optional):	Fax (Optional):	E-mail: ryan.selby@lennar.com		
Mailing Address: 11807 NE 99th St. Ste. 1170		City: Vancouver	State: WA	Zip + 4: 98682
II. Property Owner (The party listed on the County Assessor's records as owner and taxpayer of the parcel[s] for which permit coverage is requested. Ecology will <i>not</i> send correspondence and permit fee invoices to the Property Owner. The Property Owner information will be used for emergency contact purposes.)				
Name: Ryan Selby		Company: Lennar NW Inc.		
Business Phone: 360-258-7900	Ext:	Unified Business Identifier (UBI): 603-137-683 (UBI is a nine-digit number used to identify a business entity. Write "none" if you do not have a UBI number.)		
Cell Phone (Optional):	Fax (Optional):	E-mail: ryan.selby@lennar.com		
Mailing Address: 11807 NE 99th St. Ste. 1170		City: Vancouver	State: WA	Zip + 4: 98682

III. On-Site Contact Person(s) (Typically the Certified Erosion and Sediment Control Lead or Operator/Permittee)

Name: Scott Caleen		Company: Lennar NW Inc.		
Business Phone: 360-828-3922	Ext:	Mailing Address: 11807 NE 99th Street, Ste. 1170		
Cell Phone: 360-342-7055	Fax(Optional):	City: Vancouver	State: WA	Zip+4: 98682
Email: Scott.Caleen@Lennar.com				

IV. Site/Project Information

Site or Project Name Ridgefield Heights		Site Acreage Total size of your site/project (that you own/control): <u>67.4</u> acres. (Note: 1 acre = 43,560 sq. ft.)	
Street Address or Location Description (If the site lacks a street address, list its specific location. For example, Intersection of Highway 61 and 34.) 26315 NW 51st Ave		Total area of soil disturbance for your site/project over the life of the project: <u>49</u> acres. Include grading, equipment staging, excavation, borrow pit, material storage areas, dump areas, haul roads, side-cast areas, off-site construction support areas, and all other soil disturbance acreage associated with the project. (Note: 1 acre = 43,560 sq. ft.)	
Parcel ID#: _____ (Optional)			
Type of Construction Activity (check all that apply): ☒ Residential ☐ Commercial ☐ Industrial ☐ Highway or Road (city, county, state) ☐ Utilities (specify): _____ ☐ Other (specify): _____			
City (or nearest city): Ridgefield	Zip Code:	Estimated project start-up date (mm/dd/yy): 06-01-2021	
County: Clark		Estimated project completion date (mm/dd/yy): 05-25-2023	
Record the latitude and longitude of the main entrance to the site or the approximate center of site.			
Latitude: <u>45.8103218078613</u> °N		Longitude: <u>-122.720611572266</u> °W	

V. Existing Site Conditions

- Are you aware of contaminated soils present on the site? ☐ Yes ☒ No
 - Are you aware of groundwater contamination located within the site boundary? ☐ Yes ☒ No
 - If you answered yes to questions 1 or 2, will any contaminated soils be disturbed or will any contaminated groundwater be discharged due to the proposed construction activity? ☐ Yes ☐ No
- ("Contaminated" and "contamination" here mean containing any hazardous substance (as defined in WAC 173-340-200) that does not occur naturally or occurs at greater than natural background levels.)
- If you answered yes to Question 3, please provide detailed information with the NOI (as known and readily available) on the natures and extent of the contamination (concentrations, locations, and depth), as well as pollution prevention and/or treatment Best Management Practices (BMPs) proposed to control the discharge of soil and/or groundwater contaminants in stormwater. This should include information that would be included in related portions of the Stormwater Pollution Prevention Plan (SWPPP) that describe how contaminated and potentially contaminated construction stormwater and dewatering water will be managed.

VI. WQWebDMR (Electronic Discharge Monitoring Reporting)

You must submit monthly discharge monitoring reports using Ecology's WQWebDMR system. To sign up for WQWebDMR, or to register a new site, go to <https://www.ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance/WQWebPortal-guidance>. If you are unable to submit your DMRs electronically, you may contact Ecology to request a waiver. Ecology will generally only grant waiver requests to those permittees without internet access. Only a permittee or representative, designated in writing, may request access to or a waiver from WQWebDMR. To have the ability to use the system immediately, **you must submit the Electronic Signature Agreement with your transfer of coverage form.** If you have questions on this process, contact Ecology's WQWebDMR staff at WebDMRPortal@ecy.wa.gov or 800/633-6193 or 360-407-7097 (local). Note: DMRs are optional for permitted sites under 1 acre that do not discharge to impaired waterbodies.

VII. Discharge/Receiving Water Information

Indicate whether your site's stormwater and/or dewatering water could enter surface waters, **directly and/or indirectly**:

- ☒ Water will discharge directly or indirectly (through a storm drain system or roadside ditch) into one or more surface waterbodies (wetlands, creeks, lakes, and all other surface waters and water courses).

If your discharge is to a storm sewer system, provide the name of the operator of the storm sewer system:

(e.g., City of Tacoma): _____

- ☐ Water will discharge to ground with 100% infiltration, with no potential to reach surface waters under any conditions.

If your project includes dewatering, you **must** include dewatering plans and discharge locations in your site Stormwater Pollution Prevention Plan.

Location of Outfall into Surface Waterbody

Enter the outfall identifier code, waterbody name, and latitude/longitude of the point(s) where the site has the potential to discharge into a waterbody (the outfall). Enter all locations. **See illustration of Surface Waterbody Outfall locations at the end of this form.**

- Include the names and locations of both direct and indirect discharges to surface waterbodies, even if the risk of discharge is low or limited to periods of extreme weather. **Attach a separate list if necessary.**
- Give each point a unique 1-4 digit alpha numeric code. This code will be used for identifying these points in WQWebDMR.
- Some large construction projects (for example, subdivisions, roads, or pipelines) may discharge into several waterbodies.
- If the creek or tributary is unnamed, use a format such as "unnamed tributary to Deschutes River."
- If the site discharges to a stormwater conveyance system that in turn flows to a surface waterbody, include the surface waterbody name and location.

Outfall Identifier Code. These cannot be symbols. (Maximum of 4 characters).				Surface Waterbody Name at the Outfall	Latitude Decimal Degrees	Longitude Decimal Degrees
Example: 001A				Example: Puget Sound	47.5289247° N	-122.3123550° W
					° N	° W
					° N	° W
					° N	° W

If your site discharges to a waterbody that is on the impaired waterbodies list (e.g., 303[d] list) for turbidity, fine sediment, high pH, or phosphorus, Ecology will require additional documentation before issuing permit coverage and these sites will be subject to additional sampling and numeric effluent limits (per Permit Condition S8). Ecology will notify you if any additional sampling requirements apply. Information on impaired waterbodies is available online at: <https://www.ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Assessment-of-state-waters-303d>.

Before signing, please use the following checklist to ensure this form is complete:

- ☐ All spaces on this form have been completed. (Attach additional sheets if necessary)
- ☐ The transfer form has been signed by both the current permittee (see Page 1) **and** the new permittee (see Section VIII below).
- ☐ The date permit responsibility was transferred is specified. (See Page 1)
- ☐ New Operator/Permittee: Before you submit this form to Ecology, please retain a copy for your records – this will serve as proof of permit coverage until documentation arrives from Ecology.
- ☐ For partial transfers: If the original permittee no longer owns or controls any portions of the site that meet the criteria for termination, the original permittee must submit a Notice of Termination (NOT) to terminate permit coverage. See the CSWGP website for a link to the NOT form: www.ecology.wa.gov/constructionstormwaterpermit.
- ☐ For sites with contaminated soils/groundwater or a new discharger to an impaired waterbody: Any special provisions to protect water quality put in place at the time of initial coverage have been reviewed and adopted by the new permittee.

Administrative Order Docket No. _____

VIII. Certification of New Permittee

"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 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."

Ryan Selby
Printed/Typed Name

Lennar Northwest LLC
Company (operator/permittee only)

Vice President
Title

[Signature]
Signature of New Operator/Permittee

10/12/2022
Date

Signature of Operator/Permittee requirements:

- A. For a corporation: By a responsible corporate officer.
- B. For a partnership or sole proprietorship: By a general partner or the proprietor, respectively.
- C. For a municipality, state, federal, or other public facility: By either a principal executive officer or ranking elected official.

Please sign and return this **ORIGINAL** document to the following address:

Department of Ecology – Construction Stormwater
PO Box 47696
Olympia, WA 98504-7696

If you have questions about this form, contact the following Ecology staff:

Location	Contact Name	Phone	E-mail
City of Seattle, and Kitsap, Pierce, and Thurston counties	Josh Klimek	360-407-7451	josh.klimek@ecy.wa.gov
Island, King, and San Juan counties	RaChelle Stane	360-407-6556	rachelle.stane@ecy.wa.gov
Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Skagit, Snohomish, Spokane, Stevens, Walla, Whatcom, and Whitman counties.	Shawn Hopkins	360-407-6442	shawn.hopkins@ecy.wa.gov
Benton, Chelan, Clallam, Clark, Cowlitz, Douglas, Grays Harbor, Jefferson, Kittitas, Klickitat, Lewis, Mason, Okanogan, Pacific, Skamania, Wahkiakum, and Yakima counties.	Joyce Smith	360-407-6858	joyce.smith@ecy.wa.gov

Location of Discharge into Surface Waterbody

Outfall Number	Outfall Description	Surface Waterbody Name	Outfall Type	Latitude	Longitude
6	Gee Creek	Gee Creek	Surface Water Body	45.81510265 80914	- 122.7300442 26074
5	Gee Creek	Gee Creek	Surface Water Body	45.80765533 44727	- 122.7257919 31182
4	Wetpond	Wetpond	Surface Water Body	45.81404113 76953	- 122.7261667 71484
3	Wetpond	Wetpond	Surface Water Body	45.81187020 43467	- 122.7209884 12598
2	Wetpond	Wetpond	Surface Water Body	45.81187430 90404	- 122.7192916 87012
1	Wetpond	Wetpond	Surface Water Body	45.80804861 60467	- 122.7223052 07862

ATTACHMENT B

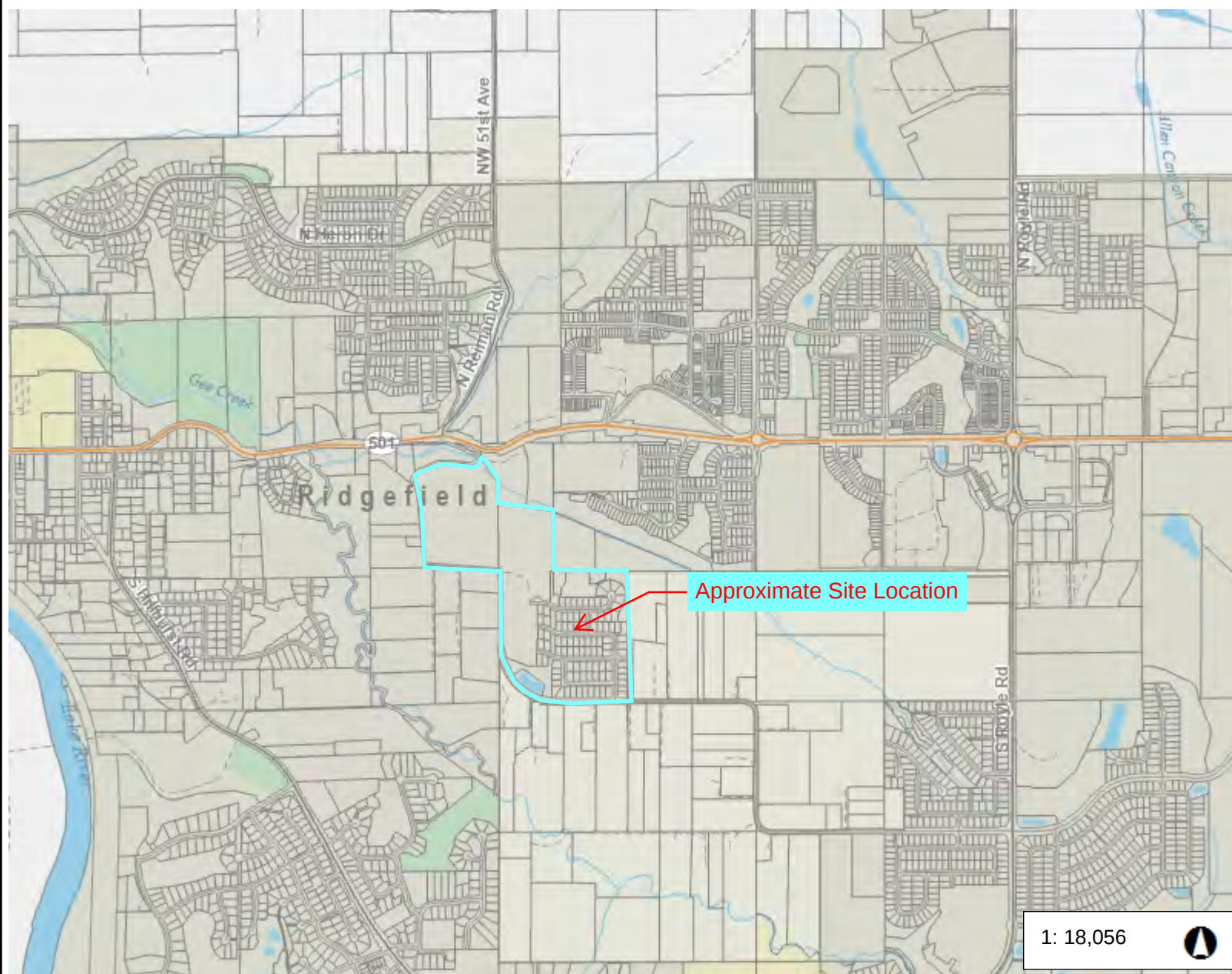
Ridgefield Heights Vicinity Map



Legend

☐ Taxlots

Notes:



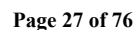
3,009.3	0	1,504.67	3,009.3Feet
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WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA. GIS - <http://gis.clark.wa.gov>

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.

ATTACHMENT C

Site Plans



ATTACHMENT D

Photograph Log

All photographs taken by Jon Klemesrud on December 20, 2022

Nikon Coolpix AW100

Photo Log- Ridgefield Heights



Photo #:01 (DSCN3097)

Description: Photo of the "Site Map Composite." A working/recent copy of the SWPPP map indicating recent BMP installations.

Photo #:02 (DSCN3098)

Description: Facing west, photo of southern sidewalk/slope along S. 10th Way.



Photo #:03 (DSCN3099)

Description: Facing east, photo of the southeast perimeter and area of sidewalk being repaired by Rotschy Inc. at the time of inspection.

Photo #:04 (DSCN3100)

Description: Facing west, photo of curb inlet catch basin covers observed along S. 10th Way.

Photo Log- Ridgefield Heights



Photo #:05 (DSCN3101)
Description: Facing west, photo of Pond A.



Photo #:06 (DSC3102)
Description: Facing west, photo of silt fencing installed north of the Pond A discharge location, south of S. 10th Way. A section of perimeter silt fencing was observed to have sediment deposited above one-third the height of the section of silt fence.



Photo #:07 (DSCN3103)
Description: Facing west, photo of outfall pipe from Pond A.



Photo #:08 (DSCN3104)
Description: Facing north, photo of Pond A.

Photo Log- Ridgefield Heights



Photo #:09 (DSCN3105)
Description: Facing north of Pond A.



Photo #:10 (DSC3106)
Description: Facing south, photo of access road east of Pond A.



Photo #:11 (DSCN3107)
Description: Facing east, photo from above Pond A. Straw bales and conveyance piping installed to assist with run-on to the northern slope of Pond A hillside.



Photo #:12 (DSCN3108)
Description: Facing west, photo from above Pond A. Straw bales and conveyance piping installed to assist with run-on to the northern slope of Pond A hillside.

Photo Log- Ridgefield Heights



Photo #:13 (DSCN3109)
Description: Facing east, photo of eastern boundary of Phase 3 adjacent to Phase 2.



Photo #:14 (DSC3110)
Description: Facing south, photo of western perimeter along S. 25th Place. Vegetative berm was observed to be partially cleared.



Photo #:15 (DSCN3111)
Description: Facing east within Phase 3, photo of the area east of the partially cleared perimeter along S. 25th Place. Area lacked stabilization.



Photo #:16 (DSCN3112)
Description: Facing north, photo of an entrance to Phase 3 along S. 25th Place.

Photo Log- Ridgefield Heights



Photo #:17 (DSCN3113)
Description: Facing south, photo of an entrance to Phase 3 along S. 25th place.



Photo #:18 (DSC3114)
Description: Facing north, photo taken north of the S. 4th Way of areas within Phase 3-5



Photo #:19 (DSCN3115)
Description: Facing north, perimeter silt fencing along the northwest perimeter.



Photo #:20 (DSC3116)
Description: Facing east photo of the uncleared areas/perimeter north of S. 25th Place.

Photo Log- Ridgefield Heights



Photo #:21 (DSCN3117)
Description: Facing east, photo of northern perimeter silt fencing



Photo #:22 (DSC3118)
Description: Facing northwest, photo of the northwestern area of Phase 5 and future Culdesac area.



Photo #:23 (DSCN3119)
Description: Facing west, photo of fire access road and stockpiles within Phase 5.



Photo #:24 (DSC3120)
Description: Facing south photo of Pond B.

Photo Log- Ridgefield Heights



Photo #:25 (DSCN3121)
Description: Facing north, photo of Pond B. outfall location.



Photo #:26 (DSC3122)
Description: Facing east, photo of area east of Pond B and west of Pond C.



Photo #:27 (DSCN3123)
Description: Facing northeast, photo of access road to Pond C.



Photo #:28 (DSCN3124)
Description: Facing north, photo of area northwest of Pond C.

Photo Log- Ridgefield Heights



Photo #:29 (DSCN3125)
Description: Facing south, photo of Pond C. Erosion observed on the southwest slope.



Photo #30: (DSC3126)
Description: Facing west, photo of the Pond C outfall area.



Photo #:31 (DSCN3127)
Description: Facing north, photo of the Phase 2 Culdesac.

ATTACHMENT E

December 14, 2022 Site Inspection Report

BMP Inspection Report

Community: Ridgefield Heights - Ridgefield Heights

Date: 12/14/2022

Time: 2:00 PM

A. Type of Inspection & Schedule (Check all that apply)

Type: ☒ Weekly ☒ Discharge Event ☐ Monthly Inspection
 Schedule: ☒ Weekly And Within 24-Hours Of Any Discharge From The Site ☐ Monthly

B. Phase of Construction: (check all that apply)

☐ Pre Construction ☐ Clearing ☐ Grading ☐ Utilities ☐ Streets ☐ Landscaping
☒ Vertical Construction ☐ Inactive Construction ☐ Off-Site Work ☐ Site Stabilized

C. Check the response for each question below:

Item #	Questions	Yes	No	N/A
1	Is the inspector qualified to perform this inspection?	☒	☐	—
2	Are the inspector's qualifications documented in this SWPPP? (If not, amend and add to the SWPPP)	☒	☐	—
3	Did you observe the presence of any floating materials, oil, sheen, grease, odor, toxins, and/or sediments?	☐	☒	—
4	If yes to #3, what types of materials did you observe? - N/A	—	—	—
5	If yes to #3, were the materials discharged off site and estimate how much? Enter discharge locations and discharge characteristics in Section "E" - N/A	—	—	—
6	Were all home sites in our control inspected today? (N/A if land Development) -	☒	☐	☐

Note: Item #7 was intentionally left out

D. Check the observed status of all items. Provide "Action Required" details and dates completed on the back of this page.

Item #	Inspection Items	Not in Use	In Use and Acceptable	In Use and Action Required
8	Community perimeter controls	☐	☒	☐
9	Outfalls / Discharge points / Outlet protection	☐	☒	☐
10	BMPs at streams, rivers, lakes, ponds, 303(d) waters, wetlands, & protected areas	☐	☒	☐
11	Stabilized exits maintained/functional	☐	☒	☐
12	Track out in public streets	☐	☒	☐
13	Onsite streets & gutters free of sediment, silt, mud, & debris	☐	☒	☐
14	Disturbed areas	☐	☐	☒
15	Slope stabilization: Erosion control blankets, mulch, vegetation, soil binders etc.	☐	☐	☒
16	Erosion controls: EC blankets, vegetation, soil binders, mulch, etc.	☐	☒	☐
17	Wind Erosion Controls: Dust control, wind fence, water, palliatives, soil binders, etc.	☒	☐	☐
18	Slope drainage structures (engineered structures, ditches, drains, etc.)	☒	☐	☐
19	Temporary sediment basins/sediment traps	☒	☐	☐
20	Detention/Retention basins	☐	☒	☐
21	Turbidity barrier	☒	☐	☐
22	Drainage swales & channels	☐	☒	☐
23	Buffer strips	☐	☒	☐
24	Berms and dikes	☒	☐	☐
25	Check dams	☒	☐	☐
26	Gabions	☒	☐	☐
27	Silt fences	☐	☒	☐
28	Sand/gravel bags/rock socks	☒	☐	☐
29	Straw wattles/fiber rolls	☐	☒	☐
30	Cutback curbs	☒	☐	☐

31	Catch basins/ Inlet protection	☐	☒	☐
32	Construction materials properly stored & protected	☐	☒	☐
33	Stockpile management	☒	☐	☐
34	Trash/Debris bins used, not overflowing & regularly collected	☐	☒	☐
35	Proper disposal of litter, construction debris & liquid waste	☐	☒	☐
36	Sanitary waste facilities properly located and maintained	☐	☒	☐
37	Concrete wash outs	☐	☒	☐
38	Paint wash outs	☒	☐	☐
39	Non-stormwater discharges properly controlled (e.g. wash water, landscape irrigation, etc.)	☒	☐	☐
40	Dewatering BMPs (e.g. filter bags, removable pump station, sump pit, etc.)	☒	☐	☐
41	Soil & paving free of stains from leaks from vehicles, power tools and/or equipment	☐	☒	☐
42	Secondary containment used for portable gas/diesel powered items	☒	☐	☐
43	Secondary containment used for bulk storage of oils, chemicals, fuels & liquid waste	☒	☐	☐
44	Material & equipment storage yards clean & maintained	☒	☐	☐
45	Drip barriers for equipment stored, parked, & under repair	☒	☐	☐
46	Other	☒	☐	☐

E. I have inspected all of the following: (All must be inspected) (Locations of BMPs inspected are shown on the BMP tracking map)

- a) All "In Place" BMP's Yes ☒ No ☐ d) All material storage areas Yes ☒ No ☐ NA ☐
b) All construction entrances and exits Yes ☒ No ☐ e) All disturbed soils areas Yes ☒ No ☐ NA ☐
c) All discharge locations Yes ☒ No ☐ f) All equipment storage areas Yes ☒ No ☐ NA ☐

Was any portion of the site unsafe for access, inaccessible, and not inspected?

Yes ☐ No ☒

If yes, explain:

Are there additional control measures needed that were not in place at the time of inspection?

Yes ☐ No ☒

If Yes, Document in Section G.

Was water quality monitoring/sampling conducted during the inspection?

Yes ☒ No ☐

If yes, document the monitoring/sampling data in the SWPPP Log.

Were there any discharges observed during the inspection?

Yes ☒ No ☐

If yes, Document the location of each discharge and visual quality of the discharge in the table below.

Stormwater Discharge Location(s)	Describe the stormwater discharge including the presence of suspended sediment, turbidity, discoloration and/or oil sheen as applicable.
Outfall 1 tract A	Observed opaque colored discharge. Ph-7.1 NTU-46.5
Outfall 2 tract B	Observed no discharge.
Outfall 3 tract C	Observed no discharge.

F. Since the last inspection has there been:

- a) A change in design, construction, operation, or maintenance that may affect discharges of pollutants from the community? Yes ☐ No ☒
b) A regulatory agency inspection that caused changes to be made to the SWPPP or additional BMPs added in the community? Yes ☐ No ☒
c) Additional or different BMPs used or needed that are not included in the current list of BMPs in the SWPPP? Yes ☐ No ☒
d) Any BMPs that failed to operate as designed or intended? Yes ☐ No ☒
e) Incident(s) of non-compliance observed? (Include schedule for remedial actions to address incidence of non-compliance) Yes ☐ No ☒

If "Yes" to any Section "F" question(s), contact the DEM and describe the event; when, where, and why it happened; what action was taken & when. Be Specific.

General Comments:

Outfall 1 tract A exceeded 25NTU benchmark; sources are slope erosion on the inside of the pond.
 Outfall 2 tract B dropped below 25NTU benchmark; no discharge was observed. Outfall was stabilized with straw and additional matting as well as a down slope pipe installed to alleviate discharge from eroding the side of the slope.
 Outfall 3 tract C dropped below 25NTU benchmark; no discharge was observed. Outfall down slope pipe was installed to alleviate discharge from eroding the side of the slope.
 Curb inlet protection was added off of S 10th Way.
 Left Cole Conley a message detailing site conditions and recommendations. Last inspection was: 12/09/2022.
 Rainfall data provided by: <https://www.wunderground.com/dashboard/pws/KWARIDGE103/table/2022-12-14/2022-12-14/daily>

G. Describe any "Action Required" items checked in Section "D" and the necessary action needed. List the item number and be specific on the location of the work needed. Document, initial, & date when the action item work has been completed on this page.

Maintenance, Repair, Reinstallation Required Items

Item #	Description & Precise Location of Action Required Item(s)	Action Taken	Date Completed & Initial
14	Disturbed areas - Add stabilization measure Temporary Stabilization @Lots 19. Observed exposed soil on lot listed. Recommend adding 2" of straw cover.		
15	Slope stabilization: Erosion control blankets, mulch, vegetation, soil binders etc. - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract A. Observed slope erosion on the inside of the stormwater pond listed. Recommend adding erosion blankets to stabilize area.		
9	Outfalls / Discharge points / Outlet protection - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract B. Observed erosion at outfall and discharging through the side of the hill indicating a design flaw. Recommend consulting the design engineer.		
9	Outfalls / Discharge points / Outlet protection - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract C. Observed erosion at outfall and discharging through the side of the hill indicating a design flaw. Recommend consulting the design engineer.	Straw and Matting down to help with erosion. Installed pipe to alleviate discharge from the side of slope eroding the hillside	12/14/2022 C.C.
12	Track out in public streets - Remove Onsite streets & gutters free of sediment, silt, mud, & debris @S. 8th Way. Observed sediment track out on street listed. Recommend removing with a sweeper.	Street sweeper to come every 2 days	12/14/2022 C.C.
14	Disturbed areas - Add stabilization measure Temporary Stabilization @Lots 19. Observed exposed soil on lot listed. Recommend adding 2" of straw cover.		
15	Slope stabilization: Erosion control blankets, mulch, vegetation, soil binders etc. - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract A. Observed erosion on the inside of the stormwater pond listed. Recommend reinforcing existing erosion control matting and installing additional matting where needed.		
31	Catch basins/ Inlet protection - Install Catch basins/ Inlet protection @All Streets. Observed inlet protection missing off of S 10th Way. Recommend installing gutter caps as well as bio bags for double protection.	Catch basins have inlet protection	12/14/2022 C.C.
9	Outfalls / Discharge points / Outlet protection - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract B. Observed erosion at outfall and discharging through the side of the hill indicating a design flaw. Recommend consulting the design engineer.		
9	Outfalls / Discharge points / Outlet protection - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract C. Observed erosion at outfall and discharging through the side of the hill indicating a design flaw. Recommend consulting the design engineer.	Straw and Matting down to help with erosion. Installed pipe to alleviate discharge from the side of slope eroding the hillside	12/14/2022 C.C.
12	Track out in public streets - Remove Onsite streets & gutters free of sediment, silt, mud, & debris @S. 8th Way. Observed sediment track out on street listed. Recommend removing with a broom or sweeper.	Street sweeper to come every 2 days	12/14/2022 C.C.
15	Slope stabilization: Erosion control blankets, mulch, vegetation, soil binders etc. - Maintain Erosion Control Matting @Outfall tract A. Observed erosion on the inside of the stormwater pond listed. Recommend reinforcing existing erosion control matting and installing additional matting where needed.		

- 31 Catch basins/ Inlet protection - Install Catch basins/ Inlet protection @All Streets. Observed inlet protection missing off of S 10th Way. Recommend installing gutter caps as well as bio bags for double protection.
- 9 Outfalls / Discharge points / Outlet protection - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract C. Observed erosion at outfall. Recommend consulting with design engineer.
- 9 Outfalls / Discharge points / Outlet protection - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract B. Observed erosion at outfall. Recommend consulting with design engineer.
- 9 Outfalls / Discharge points / Outlet protection - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract C. Observed erosion at outfall. Recommend consulting with design engineer.
- 15 Slope stabilization: Erosion control blankets, mulch, vegetation, soil binders etc. - Add stabilization measure Temporary Stabilization @Outfall tract A. Observed slope erosion on the inside of the stormwater pond listed. Recommend adding erosion blankets to stabilize area.
- 27 Silt fences - Install Silt Fence @Lots 64. Observed sediment erosion on backside of lot listed. Recommend installing silt fence on the high side of the slope.
- 27 Silt fences - Install Silt Fence @Lots 65. Observed sediment erosion on backside of lot listed. Recommend installing silt fence on the high side of the slope.
- 27 Silt fences - Install Silt Fence @Lots 66. Observed sediment erosion on backside of lot listed. Recommend installing silt fence on the high side of the slope.
- 27 Silt fences - Install Silt Fence @Lots 67. Observed sediment erosion on backside of lot listed. Recommend installing silt fence on the high side of the slope.
- 27 Silt fences - Install Silt Fence @Lots 68. Observed sediment erosion on backside of lot listed. Recommend installing silt fence on the high side of the slope.
- 27 Silt fences - Install Silt Fence @Lots 69. Observed sediment erosion on backside of lot listed. Recommend installing silt fence on the high side of the slope.
- 27 Silt fences - Install Silt Fence @Lots 70. Observed sediment erosion on backside of lot listed. Recommend installing silt fence on the high side of the slope.
- 27 Silt fences - Install Silt Fence @Lots 71. Observed sediment erosion on backside of lot listed. Recommend installing silt fence on the high side of the slope.
- 9 Outfalls / Discharge points / Outlet protection - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract B. Observed erosion at outfall. Recommend consulting with design engineer.
- 9 Outfalls / Discharge points / Outlet protection - Maintain Outfalls/Discharge points/Outlet protection @Outfall tract C. Observed erosion at outfall. Recommend consulting with design engineer.
- 9 Outfalls / Discharge points / Outlet protection - Repair Outfalls/Discharge points/Outlet protection @Outfall tract B. Observed erosion at outfall. Recommend consulting with design engineer.
- 9 Outfalls / Discharge points / Outlet protection - Repair Outfalls/Discharge points/Outlet protection @Outfall tract C. Observed erosion at outfall. Recommend consulting with design engineer.
- 13 Onsite streets & gutters free of sediment, silt, mud, & debris - Remove Onsite streets & gutters free of sediment, silt, mud, & debris @Lots 118. Observed sediment erosion escaping LD site adjacent to lot listed and flow going along curb gutter to nearby catch basin. Recommend removing with a shovel and sweeper.
- 9 Outfalls / Discharge points / Outlet protection - Add stabilization measure Outfalls/Discharge points/Outlet protection @Outfall tract A. Observed sediment erosion at the outfall sample point on outfall listed. Recommend adding quarry spalls to stabilize.

Straw and Matting down to help with erosion. 12/14/2022 C.C.
Installed pipe to alleviate discharge from the side of slope eroding the hillside

Straw and Matting down to help with erosion. 12/14/2022 C.C.
Installed pipe to alleviate discharge from the side of slope eroding the hillside

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Straw and Matting down to help with erosion. 12/14/2022 C.C.
Installed pipe to alleviate discharge from the side of slope eroding the hillside

- 9 Outfalls / Discharge points / Outlet protection - Add stabilization measure Outfalls/Discharge points/Outlet protection @Outfall tract B. Observed sediment erosion at the outfall sample point on outfall listed. Recommend adding quarry spalls to stabilize.
- 9 Outfalls / Discharge points / Outlet protection - Add stabilization measure Outfalls/Discharge points/Outlet protection @Outfall tract C. Observed erosion at outfall. Recommend consulting with design engineer. Straw and Matting down to help with erosion. 12/14/2022 C.C. Installed pipe to alleviate discharge from the side of slope eroding the hillside
- 13 Onsite streets & gutters free of sediment, silt, mud, & debris - Remove Onsite streets & gutters free of sediment, silt, mud, & debris @Lots 118. Observed sediment erosion from lot listed that has made its way to nearest catch basin. Recommend removing sediment with a broom or sweeper.
- 14 Disturbed areas - Add stabilization measure Temporary Stabilization @Lots 118. Observed evidence of slope sediment erosion. Recommend adding 2" of straw.
- 14 Disturbed areas - Add stabilization measure Temporary Stabilization @Outfall tract A. Observed evidence of slope sediment erosion. Recommend adding 2" of straw.

Additional Controls Needed

<u>Item #</u>	<u>Description & Precise Location of Additional Control(s) Needed</u>	<u>Action Taken</u>	<u>Date Completed & Initial</u>
---------------	---	---------------------	-------------------------------------

CERTIFICATION AND SIGNATURE

Inspection Date: 12/14/2022

CGP Tracking No.: WAR306634

Community Name: Ridgefield Heights

Certification and Signature by BMP Inspector:

By inserting my electronic signature below, I intend to sign this document and I hereby acknowledge and agree that my signature is being provided electronically and that my electronic signature and/or initials appearing on this report are the same as if I had affixed my original handwritten signature for the purpose of validity, enforceability, and admissibility. I acknowledge that I have access to this report.

"I certify that this report is true, accurate, and complete to the best of my knowledge and belief."

Inspected By (Print Name): Aaron Searcy

Title: 3rd Party Inspector

Signature:



Date: 12/15/2022

Company:

AKS Engineering & Forestry LLC

Phone: (503) 320-5646

Certification and Signature by Permittee or "Duly Authorized Representative":

By inserting my electronic signature below, I intend to sign this document and I hereby acknowledge and agree that my signature is being provided electronically and that my electronic signature and/or initials appearing on this report are the same as if I had affixed my original handwritten signature for the purpose of validity, enforceability, and admissibility. I acknowledge that I have access to this report.

"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 gathered and evaluated 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."

Signature of Permittee or
"Duly Authorized Representative":

Date:

Printed Name:

Title:

Phone:

ATTACHMENT F

Inspection Response Letters



January 18, 2023

VIA EMAIL AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

Jon Klemesrud
Field, Data, & Drinking Water Enforcement Section
Enforcement & Compliance Assurance Division
1200 Sixth Avenue
Suite 155, 20-C04
Seattle, WA 98101
Klemesrud.jon@epa.gov

**Re: EPA Stormwater Compliance Inspection, December 20, 2022
Ridgefield Heights Development; Ridgefield, Washington
WDOE NPDES Tracking No. WAR 306634**

Dear Mr. Klemesrud,

The purpose of this letter is to timely respond to the comments made to Lennar associates during and after the United States Environmental Protection Agency, Region 10 (EPA) stormwater compliance inspection referenced above and to advise that the items commented upon were corrected.

Lennar has a strong commitment to environmental compliance. Consequently, since EPA's inspection, Lennar has scheduled a refresher training for all construction associates in the Portland Division. The training will be responsive to the comments provided by the EPA.

Please be advised that the training will be conducted by Lennar's Regional Environmental Manager (REM) or National Environmental Manager; both are Certified Professionals in Erosion and Sediment Control™ (CPESC) and Certified Erosion, Sediment and Stormwater Inspectors™ (CESSWI). The REM is also a Certified Erosion and Sediment Control Lead (CESCL) through the Washington Department of Ecology.

Comments verbally conveyed at the time of your site inspection:

1. *"Area adjacent to the entrance to the community has areas of exposed soils."*

Completed Corrective Action: Lennar installed temporary stabilization measures such as erosion control matting (ECM) and straw mulch to the area adjacent to the community entrance on December 27, 2022. See photo No. 1b.

2. *"Stabilize slopes above Pond A with additional matting or straw."*

Completed Corrective Action: Lennar installed ECM on the slope above Pond A and installed straw mulch to the southeast corner of Pond A by December 30, 2022. The ECM installation on the remaining slope within Cell No. 1 of Pond A was delayed due to the subsequent rain events following the EPA site inspection, causing the water level of the pond to rise and prevent access. When the water level in the



pond recovered, Lennar installed ECM to the remainder of the slope in Cell No. 1 of Pond A on January 5, 2023.

3. *“Silt fence at discharge for Pond A needs maintenance and sediment removal.”*

Completed Corrective Action: On January 1, 2023, Lennar removed the collected sediment and maintained the silt fence located upslope of the Pond A discharge pipe. See photo No. 3b.

4. *“Pond A discharge point needs attention.”*

Response: Construction of Pond A included connecting the pond’s control structure into an existing 12-inch culvert under S. 10th Way. See Attachment No. 1. The existing pipe and associated outlet protection is the responsibility of the municipal separate storm sewer system (MS4) operator, the City of Ridgefield. In addition, the construction plans approved by the City of Ridgefield on June 3, 2021, do not identify any improvements or enhancements to the existing culvert or outlet protection. Regardless, on January 3, 2023, Lennar installed rip-rap outlet protection to the existing 12-inch culvert. See photo No. 4b.

5. *“Path by Pond A has some erosion along the perimeter of the paved area.”*

Completed Corrective Action: On December 29, 2022, Lennar began installing silt fence and rock check dams on the upslope side of the walking path located above Pond A; and completed the installations on January 6, 2023. See photo No. 5b.

6. *“Erosion observed above Pond A across paved footpath”*

Completed Corrective Action: On January 3, 2023, Lennar regraded the area and installed ECM and straw mulch on the slope above Pond A and across the footpath. On January 5, 2023, Lennar installed a straw wattle on the downslope side of the footpath above Pond A. See photo No. 6b. Additionally, to help control the stormwater velocity upgradient of this area, Lennar installed several straw wattles on the slope above the footpath on January 3, 2023. See photo No. 6d.

7. *“Phase 3 observed a break in vegetation at S. 25th Place and low point is exposed and flows to road.”*

Completed Corrective Action: On January 5, 2023, Lennar installed a perimeter straw wattle above the low point in Phase 3 at the break in the vegetation. On January 10, 2023, Lennar installed straw mulch stabilization to the area upslope of the low point in Phase 3. See photo No. 7b.

8. *“Entrance to Phases 3-5 needs maintenance.”*

Completed Corrective Action: On January 10, 2023, Lennar removed the stabilized construction entrance to Phases 3, 4, and 5 and installed perimeter silt fence to prevent construction access to this area. See photo Nos. 8b and 8d.

9. *“West side of phase 5 needs silt fence tie in.”*

Completed Corrective Action: On January 4, 2023, Lennar extended the silt fence along the west side of Phase 5 and terminated the run of silt fence into a silt fence end-return. See photo No. 9b.



10. *“Exposed soil in Phase 5 near South 4th Way.”*

Completed Corrective Action: On January 10, 2023, Lennar installed straw mulch stabilization to portions of Phase 5 along S. 4th Way, and installed perimeter silt fence along the eastern portion of the road. See photo No. 10b.

11. *“Area north of Phase 5 perimeter silt fence is full and needs attention.”*

Completed Corrective Action: On January 4, 2023, Lennar maintained the perimeter silt fence along the northern area of Phase 5 as needed. See photo No. 11b.

12. *“Along S. 21st Place, some areas need additional straw near the fire service road”*

Completed Corrective Action: On January 5, 2023, Lennar installed additional straw mulch to portions of the stockpiles located at S. 21st Place. Additionally, Lennar installed a silt fence at the base of the stockpiles along the fire service turnaround road. See photo No. 12b.

13. *“Pond B silt fence needs maintenance/repair.”*

Completed Corrective Action: On December 27, 2022, Lennar removed the collected sediment and maintained the silt fence along the northeast corner of Pond B. See photo No. 13b.

14. *“North side of the walking path, perimeter silt fence needs attention.”*

Completed Corrective Action: On January 6, 2023, Lennar maintained the silt fence and installed additional straw mulch on the north side of the walking path adjacent to Pond B. See photo No. 14b.

15. *“Pond C needs attention, erosion observed at the entrance.”*

Completed Corrective action: On December 29, 2022, Lennar installed a straw wattle at the top of slope along the entrance to Pond C, and installed ECM on the south slope of Pond C. See photo No. 15b.

16. *“Silt fence at the rear perimeter of Pond C is full in some areas.”*

Completed Corrective Action: On January 4, 2023, Lennar maintained and removed the collected sediment from the perimeter silt fence at the rear of Pond C. See photograph 16b.

17. *“Exposed soils need coverage along Phase 2 Cul de Sac. Install curbside check dams to slow the flow of water.”*

Completed Corrective Action: On January 5, 2023, Lennar installed additional straw mulch behind the curb along the Phase 2 cul-de-sac. See photo No. 17b. Lennar also installed curbside check dams along the Phase 2 cul-de-sac to control the stormwater flow. See photo No. 17c.

18. *“Phase 3 exposed soil needs straw coverage.”*

Completed Corrective Action: On January 10, 2023, Lennar installed straw mulch stabilization in Phase 3. See photo No. 18b.



The statements above are for information purposes only in furtherance of the final resolution of the items verbally conveyed during the EPA inspection of the Ridgefield Heights development on December 20, 2022. Nothing in this letter should be construed as an admission of liability or a declaration against interest as strictly prohibited by the Federal Rules of Evidence Section 408. If the EPA takes further legal action against Lennar as a result of the December 20, 2022 inspection, Lennar reserves the right to present all appropriate arguments and evidence, regardless of whether they are presented in this letter.

Please contact our Division Environmental Manager, Cole Conley, at 360-946-1730 should you have any questions.

Sincerely,

DocuSigned by:

Ryan Selby

D7F46251B8E64A0...

Ryan Selby

Division President

Lennar Northwest, LLC

Enclosures: Photo documentation
Attachment 1: Sheet C5.4 from the Ridgefield Heights Approved Construction Plans

cc: Brian Johnson, Washington Department of Ecology, 12121 NE 99th Street
Vancouver, Washington 98682-2346



Ridgefield Heights Photo Documentation

Inspection Photo

Photo 1a: Observed small slope failure at the entrance and disturbed soils where posts are installed.



Lennar Photo

Photo 1b: View of installed erosion control matting at the entrance to the development.



Photo 2a: Erosion observed on hillside above the pond A.



Photo 2b: View of temporarily stabilized measures installed at Pond A.





Photo 3a: Silt fence at Pond A discharge needs maintenance.



Photo 3b: View of maintained perimeter silt fence adjacent to the Pond A discharge pipe.



Photo 4a: Pond A discharge point needs attention.



Photo 4b: View of installed outlet protection at Pond A discharge pipe.





Photo 5a: Path by Pond A has some erosion along the perimeter of paved area.



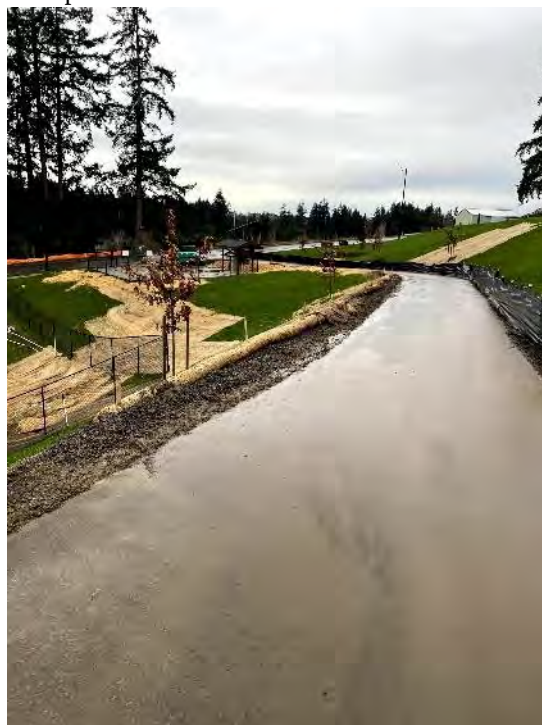
Photo 5b: View of installed silt fence along the footpath at Pond A.



Photo 6a: Erosion observed above Pond A across paved footpath.



Photo 6b: View of installed straw wattle adjacent to footpath above Pond A.



LENNAR®

Photo 6c: Erosion observed above Pond A across paved footpath.



Photo 6d: View of straw stabilization and linear straw wattles installed.



Photo 7a: Phase 3 observed break in vegetation at S. 25th Place and low point is open to roadway.



Photograph 7b. View of installed straw wattle and straw mulch at the low point along Phase 3 perimeter at S. 25th Place.



LENNAR®

Photo 8a. West entrance to Phases 3-5 needs maintenance (Facing north).



Photo 8b. View facing north of the installed straw mulch and additional silt fence at the entrance to Phase 3, 4, and 5.



Photo 8c. West entrance to Phases 3-5 needs maintenance (Facing south).



Photo 8d. View facing south of the installed straw mulch and additional silt fence at the entrance to Phase 3, 4, and 5.



LENNAR®

Photo 9a. West side of Phase 5 Silt fence needs to be extended.



Photo 9b. View of extended and terminated end run of perimeter silt fence along the west side of Phase 5.



Photo10a – Exposed soil in Phase 5 near S. 4th Way.



Photo 10b – View of installed straw mulch stabilization and perimeter silt fence in Phase 5 near S. 4th Way.



LENNAR®

Photo 11a: Phase 5 northwest corner, silt fence needs maintenance.



Photo 11b: View of maintained perimeter silt fence along the northwest corner of Phase 5.



Photo 12a: Along S. 21st Place, mostly well covered with a few areas lacking enough straw mulch along the fire access road.



Photo 12b: View of additional mulch and perimeter silt fence installed along S. 21st Place and the fire access road.





Photo 13a: Pond B silt fence needs maintenance



Photo 13b: View of maintained silt fence along the north perimeter of Pond B.



Photo 14a: North side of walking path and Pond B, silt fence needs maintenance.



Photo 14b: View of maintained silt fence and additional straw mulch installed on the north side of the footpath and Pond B.





Photo 15a: Pond C entrance area needs maintenance, erosion observed.



Photo 15b. View of installed erosion control matting on the south slope of Pond C.



Photo 16a: Pond C silt fence needs maintenance where needed.



Photo 16b: View of maintained silt fence along the west side of Pond C.



LENNAR®

Photo 17a: Phase 2 cul-de-sac, exposed areas within straw mulch need re-application.



Photo 17b: View of additional straw mulch installed along the Phase 2 cul-de-sac.



Photo 17c – View of curbside check dams installed in the Phase 2 cul-de-sac.





Photo 18a: Phase 3 exposed soil needs straw coverage.

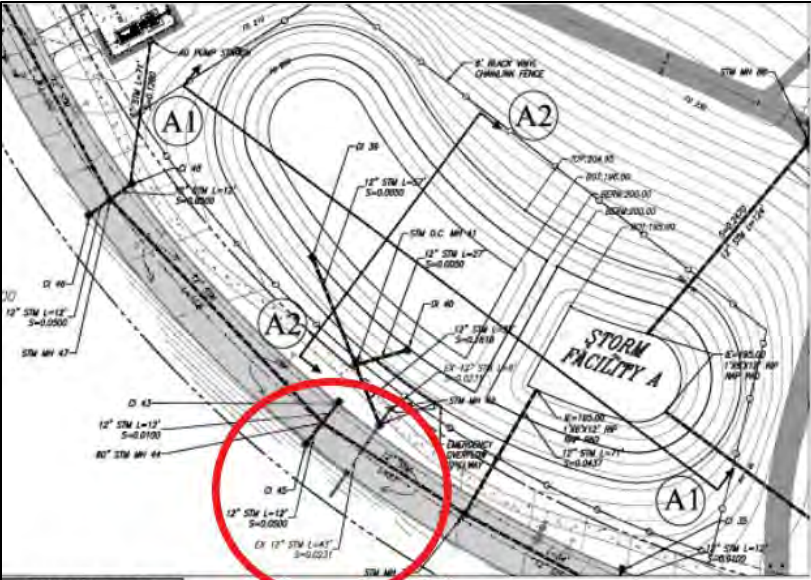


Photo 18b: View of installed straw mulch stabilization in Phase 3.





Attachment No. 1



ELEVATION LEGEND

TOP = TOP OF POND
NOT = BOTTOM OF POND
BOTM = TOP OF DRAIN, BOTTOM

Orencia
Stormwater Catch Basins

Applications

General

Standard Models

Product Code Diagram

Materials of Construction

Notes: Details are Feb 11 Jan 13 and 14

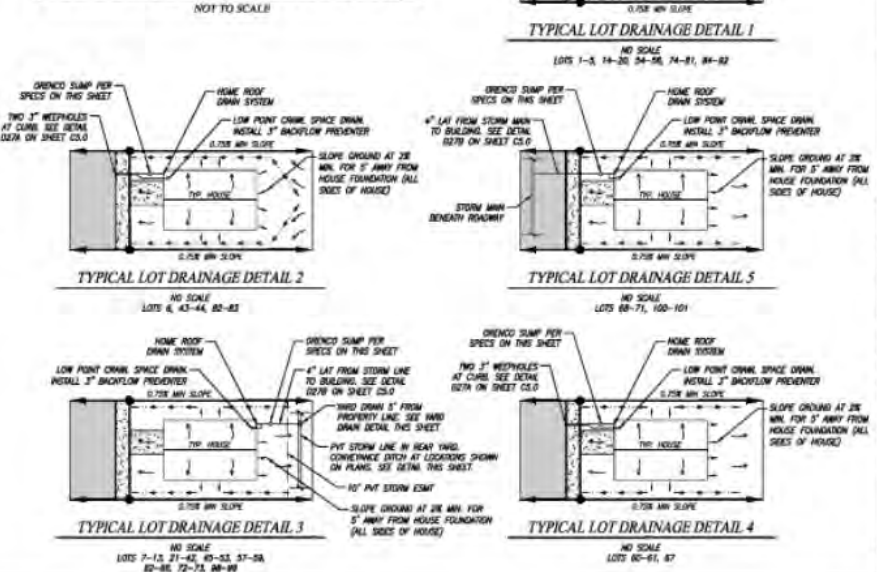
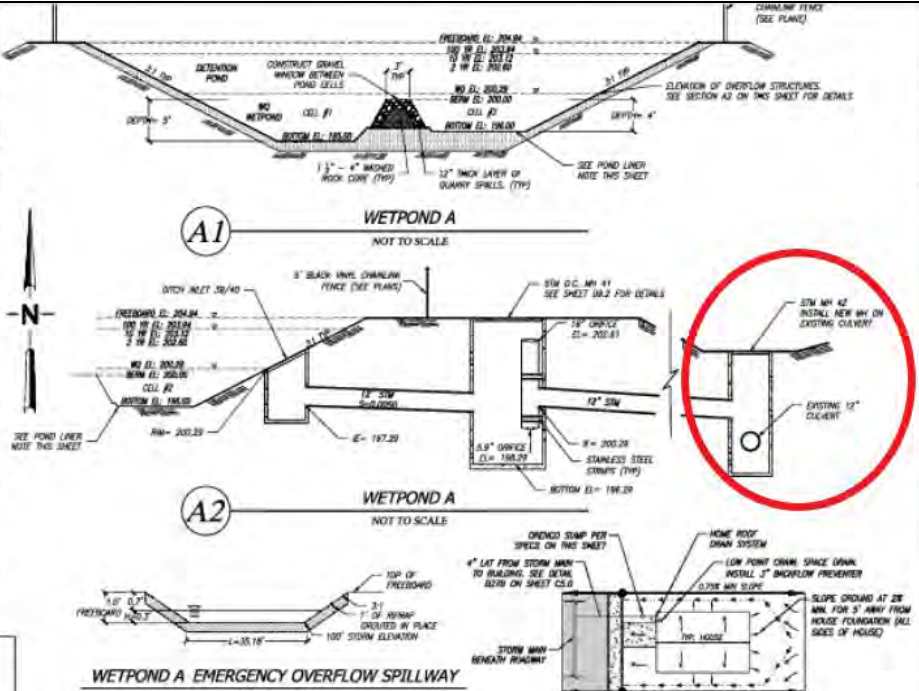
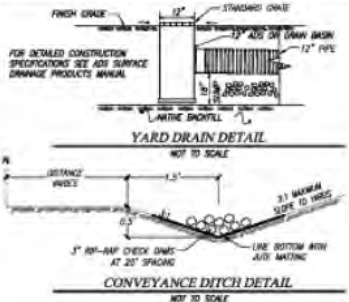
POND CONSTRUCTION NOTES:
POND CONSTRUCTION SHALL FOLLOW ALL RECOMMENDATIONS IN THE ORIGINAL DESIGN REPORT BY COLUMBIA WEST ENGINEERING, INC. (DATED JULY 30, 2007) AND THE ADDENDUM TO THE ORIGINAL REPORT (DATED JULY 18, 2015).

POND LINER NOTE:
THE PROPOSED POND SHOULD BE LINED WITH A LOW PERMEABILITY SOIL LINER MATERIALS PROPOSED FOR THE LINER SHOULD BE TESTED BY COLUMBIA WEST AT THE TIME OF CONSTRUCTION AND SHOULD CONSIST OF NATIVE OR IMPORTED MATERIALS MEETING THE FOLLOWING PARAMETERS:

- MIN 75% PASSING THE NO. 200 SIEVE
- MAX 2% ORGANIC CONTENT
- USCS SOIL CLASSIFICATION OF ML, CL, MH, OR CH
- PLASTICITY INDEX BETWEEN 15 AND 30 PERCENT
- IN SITU INFILTRATION RATE (HYDRAULIC CONDUCTIVITY, K) < 0.01 IN/HR

COLUMBIA WEST ANTICIPATES THAT SOME FINE-TEXTURED NATIVE SOIL (SOIL TYPE 1) WILL BE SUITABLE FOR USE AS LINER MATERIAL. IF MOISTURE-CONDITIONED AND COMPACTED TO MEET PROJECT SPECIFICATIONS, IF NATIVE POND BOTTOM AND SLOPE SOILS ARE PROPOSED AS THE LINER MATERIAL, INTERNAL SURFACES OF THE POND SHOULD BE SCANNED TO A MINIMUM DEPTH OF 12 INCHES AND RECOMPACTED. IF IMPORTED SOIL IS PROPOSED FOR USE AS A LINER, THE MATERIAL SHOULD BE PLACED UPON FIRM NATIVE SOIL OR COMPACTED STRUCTURAL FILL. IMPORTED LINER MATERIAL PLACED ON SLOPES GREATER THAN 3:1:V SHOULD BE BENCHES AS NECESSARY TO KEY THE LINER INTO THE SLOPE.

THE LINER SHOULD BE COMPACTED TO AT LEAST 85 PERCENT OF MAXIMUM DRY DENSITY AS DETERMINED BY THE MODIFIED PROCTOR MOISTURE-DENSITY TEST (ASTM D1557). MATERIALS SHOULD BE COMPACTED AT A MOISTURE CONTENT APPROXIMATELY TWO PERCENT ABOVE OPTIMUM CONDITIONS. THE FINAL THICKNESS OF THE COMPACTED LINER SHOULD BE NO LESS THAN 12 INCHES. INFILTRATION TESTING SHOULD BE CONDUCTED ON THE FINISHED SIGNALS AND BOTTOM OF THE POND TO VERIFY THAT THE COMPACTED LINER EXHIBITS AN INFILTRATION RATE LESS THAN 0.01 IN/HR.



COLUMBIA WEST ENGINEERING & DESIGN
CIVIL ENGINEERING • LAND PLANNING
DEVELOPMENT SERVICES
LANDSCAPE ARCHITECTURE

2005 BROADWAY
HARRISBURG, PA 17105
PHONE (717) 633-0011
FAX (717) 633-0012

**RIDGEFIELD HEIGHTS
SUBDIVISION
PHASES I & II**
WASHINGTON
CITY OF RIDGEFIELD

STORMWATER DETAILS SHEET 1

APPROVED

DESIGNED BY: NAVY
DRAWN BY: NAVY
CHECKED BY: JTM
SCALE: AS SHOWN

JOB NUMBER: 1508
SHEET: CS,4



February 1, 2023

VIA EMAIL

Jon Klemesrud
Field, Data, & Drinking Water Enforcement Section
Enforcement & Compliance Assurance Division
1200 Sixth Avenue
Suite 155, 20-C04
Seattle, WA 98101
Klemesrud.jon@epa.gov

Subject: EPA Email Correspondence dated January 26, 2023, for the Ridgefield Heights Development; Ridgefield, Washington; WDOE NPDES Tracking No. WAR 306634

Dear Mr. Klemesrud:

The attached United States Environmental Protection Agency, Region 10 (EPA) email correspondence for the Ridgefield Heights development was submitted to Lennar Northwest, LLC (Lennar) on January 26, 2023, and received the same day. See Attachment No. 1. This letter serves as a timely response to your data inquiry.

EPA Email Correspondence Item:

1. "I am finishing up my inspection report from last month and have one item I was hoping to get clarity on. It appears the November 2022 DMR (attached) was submitted by Paul Hanson (Rotschy, Inc.?) and indicated "No Discharge." I know there was some transitioning that was occurring, but I noticed when reviewing Aaron's November inspection reports for Lennar, there were multiple weeks of documented discharge, and those values were not reflected in the November DMR. A potential area of concern for my report. FYI the December DMR submitted by Aaron looked correct and reflected Aaron's sample results (also attached)."

Response: Lennar's consultant, AKS Engineering & Forestry, LLC (AKS) sampled the stormwater discharges for the Ridgefield site during the month of November 2022 and documented the results on the BMP inspection reports in accordance with the Washington Construction General Permit. Copies of these inspection reports were provided to you on December 21, 2022. However, Lennar's discharge monitoring reports (DMRs) were not uploaded for the month of November 2022 through the Washington Department of Ecology (DOE) PARIS system. Also, the previous permittee for DOE NPDES Permit Tracking No. WAR306634 (Rotschy) submitted a DMR for the month of November 2022, after they had transferred permit coverage to Lennar on October 26, 2022.

On January 30, 2023, Lennar contacted Tonya Wolfe in the Information Technology Unit at DOE to retroactively submit our November DMRs into the PARIS system. Unfortunately, since Lennar's December 2022 DMRs have already been submitted, and a November 2022 DMR was already



submitted by Rotschy, DOE was unable to enter the November results for Lennar. Ms. Wolfe suggested talking with Brian Johnson (DOE) and stated it may be possible keep November 2022 sampling documentation onsite. See Attachment No. 2. Lennar contacted Mr. Johnson and on January 31, 2023, he responded that Lennar could document November 2022 discharge sampling results on the December 2022 DMR note section. See Attachment No. 3. Lennar added the November 2022 discharge sampling data in the DOE PARIS notes section for the Ridgefield Heights December 2022 DMRs on February 1, 2023; a screen shot of the sampling data in the note is attached. See Attachment No. 4.

The statements above are for information purposes only in furtherance of the final resolution of your January 26, 2023, EPA Email Correspondence. Nothing in this letter should be construed as an admission of liability or a declaration against interest as strictly prohibited by the Federal Rules of Evidence Section 408. If EPA takes further legal action against Lennar as a result of the January 26, 2023, Email Correspondence, Lennar reserves the right to present any and all appropriate arguments and evidence, regardless of whether they are presented in this letter.

Please contact me at 360-946-1730 should you have any questions.

Sincerely,

DocuSigned by:
Cole Conley
E6E58D0FB347439...

Cole Conley
Division Environmental Manager
Lennar Northwest, LLC

Enclosures Attachment 1: EPA Email Correspondence dated January 26, 2023
Attachment 2: WDOE Email Correspondence dated January 30, 2023
Attachment 3: WDOE Email Correspondence dated January 31, 2023
Attachment 4: Screen shot of December DMR note in DOE PARIS for Ridgefield November
discharge sampling

Cole Conley

From: Klemesrud, Jon <Klemesrud.Jon@epa.gov>
Sent: Thursday, January 26, 2023 1:13 PM
To: Cole Conley
Cc: Johnson, Brian (ECY)
Subject: RE: Ridgefield Heights Inspection Response
Attachments: Copy of Record RotschyInc. Tuesday December 6 2022.PDF; Copy of Record AKSEngineeringForestry Thursday January 12 2023.PDF

Follow Up Flag: Follow up
Flag Status: Flagged

This Message Is From an External Sender

This message came from outside your organization.

[Report Suspicious](#)

Hi Cole,

I am finishing up my inspection report from last month and have one item I was hoping to get clarity on. It appears the November 2022 DMR (attached) was submitted by Paul Hanson (Rotschy, Inc.?) and indicated "No Discharge." I know there was some transitioning that was occurring but I noticed when reviewing Aaron's November inspection reports for Lennar, there were multiple weeks of documented discharge and those values were not reflected in the November DMR. A potential area of concern for my report. FYI the December DMR submitted by Aaron looked correct and reflected Aaron's sample results (also attached).

Much appreciated,

Jon Klemesrud
Field, Data, & Drinking Water Enforcement Section
Enforcement & Compliance Assurance Division (M/S 20-C04)
U.S. Environmental Protection Agency, Region 10
(206) 553-5068

From: Cole Conley <cole.conley@lennar.com>
Sent: Wednesday, January 18, 2023 3:00 PM
To: Klemesrud, Jon <Klemesrud.Jon@epa.gov>; Johnson, Brian (ECY) <BRJO461@ecy.wa.gov>
Subject: Ridgefield Heights Inspection Response

Good afternoon,

Attached please find Lennar response to your December 20, 2022 inspection at Ridgefield Heights. Please let me know if you have any comments or questions.

Have a great day.

Cole Conley
Division Environmental Manager



Mobile: 360.946.1730

Cole.conley@Lennar.com

Confidentiality Notice: This e-mail is intended only for the use of the person to whom it is addressed and contains information which may be confidential or privileged. If you are not the person to whom this e-mail is addressed, or an agent authorized by such person to receive this e-mail, you are hereby notified that any examination, copying, distribution or other unauthorized use of this e-mail is prohibited. If you received this e-mail in error, please notify me immediately at the e-mail address referenced above.

Cole Conley

From: Wolfe, Tonya (ECY) <TWOL461@ECY.WA.GOV>
Sent: Monday, January 30, 2023 11:52 AM
To: Cole Conley; Aaron Searcy
Subject: RE: DMR submission question

This Message Is From an External Sender

This message came from outside your organization.

[Report Suspicious](#)

I tried calling you to talk with you but your voicemail box has not been set up.

I updated the 2 dates to 11/1/2022 but then the DMRs wouldn't populate the parameters. So I changed them back. The issue is the December DMR has been submitted.

I would suggest you contact your inspector Brian Johnson at brjo461@ecy.wa.gov to see if you can just keep the documents on-site since November was submitted by Rotschy (have Aaron resubmit the DMRs though so the permit is in compliance). Thanks Tonya

Tonya Wolfe
Information Technology Unit
Water Quality Program
(360) 407-7097
(800) 633-6193/Option 3

From: Cole Conley <cole.conley@lennar.com>
Sent: Monday, January 30, 2023 11:39 AM
To: Wolfe, Tonya (ECY) <TWOL461@ECY.WA.GOV>; Aaron Searcy <searcya@aks-eng.com>
Subject: RE: DMR submission question

Those points are correct. The active date just needs to be moved to 11/1/22, which is where we were running into issues.

If it is possible, could we also change the ID of tract A from outfall 5 to 1?

Thanks,

Cole Conley
Division Environmental Manager

LENNAR

Mobile: 360.946.1730
Cole.conley@Lennar.com

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From: Wolfe, Tonya (ECY) <TWOL461@ECY.WA.GOV>
Sent: Monday, January 30, 2023 11:24 AM
To: Cole Conley <cole.conley@lennar.com>; Aaron Searcy <searcya@aks-eng.com>
Subject: RE: DMR submission question

Yes, it was submitted by Paul Hanson with Rotschy and then cleared and the December DMR was submitted by Aaron Searcy.

Aaron added new points to start on 12/1/2022. Are these the points that need to be for November? Thanks Tonya

DMRs for Pe
Facility/Site

DMR Search

Submission History

Monitoring Points

These are the monitoring points that will appear on your DMRs.

To Add a Monitoring Point

1. Click on the "Add Monitoring Point" button below.
2. Enter the monitoring point descriptive information.
3. Click a point on the map to show its location.
4. Click the "Save" button.

Id	Outfall	Description	Active Date
2	2	Tract B	12/01/2022
3	3	Tract C	12/01/2022
5	5	Tract A	01/01/2021

Tonya Wolfe
Information Technology Unit
Water Quality Program
(360) 407-7097
(800) 633-6193/Option 3

From: Cole Conley <cole.conley@lennar.com>
Sent: Monday, January 30, 2023 11:14 AM
To: Aaron Searcy <searcya@aks-eng.com>; Wolfe, Tonya (ECY) <TWOL461@ECY.WA.GOV>
Subject: RE: DMR submission question

Tonya,

Yes this will be only for November. I believe the issue may be because the DMR for November was submitted by someone else as we were transitioning into Lennar taking over the permit. Can we still add data separately to the original submission?

Thanks,

Cole Conley

Division Environmental Manager

LENNAR

Mobile: 360.946.1730

Cole.conley@Lennar.com

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From: Aaron Searcy <searcy@aks-eng.com>

Sent: Monday, January 30, 2023 11:06 AM

To: Cole Conley <cole.conley@lennar.com>

Subject: RE: DMR submission question

Yes, I tried doing that, and the issue is that the DMR was already submitted. When I added the monitoring points, I couldn't add them as active before December 1st, 2022.

Aaron Searcy, CESCL



AKS ENGINEERING & FORESTRY, LLC

9600 NE 126th Avenue, Suite 2520 | Vancouver, WA 98682

P: 360.882.0419 Ext. 330 | www.aks-eng.com | searcy@aks-eng.com

Offices in: Bend, OR | Keizer, OR | Tualatin, OR | Vancouver, WA

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From: Cole Conley <cole.conley@lennar.com>

Sent: Monday, January 30, 2023 10:27 AM

To: Aaron Searcy <searcy@aks-eng.com>

Subject: FW: DMR submission question

EXTERNAL EMAIL: This email originated from outside AKS Engineering & Forestry.

Have you tried this?

Thanks,

Cole Conley

Division Environmental Manager



Mobile: 360.946.1730

Cole.conley@Lennar.com

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From: Wolfe, Tonya (ECY) <TWOL461@ECY.WA.GOV>

Sent: Monday, January 30, 2023 10:25 AM

To: Cole Conley <cole.conley@lennar.com>

Cc: Aaron Karlsen <karlsena@aks-eng.com>; Tammy Moad <moadt@aks-eng.com>

Subject: RE: DMR submission question

You can add and inactive points through the PORTAL. The issue may be because the December DMR was submitted. Is the new mp only going to be for November? Thanks Tonya

Discharge Monitoring Reports WQWebDMR

[WQWebDMR Home](#)
[WQWebPortal Home](#)
[Help](#)
[FAQs](#)
[System Admin](#)
[Logout](#)

DMRs for Permit WAR306634

Facility/Site: Ridgefield Heights

[DMR Search](#)
[Submission History](#)
[Monitoring Points](#)

Search DMRs

Monitoring Period Start Date:

Monitoring Period End Date:

DMR Status:

DMR Type:

Add or inactivate monitoring points before starting your DMR - use the Monitoring Point tab ab

Search Results

Submit	Monitoring Period	DMR Type	Due Date	DMR Status	Attachments	Viol Mes
	01/01/2023 - 01/31/2023	Monthly	02/15/2023	Not Started	0	0
	12/01/2022 - 12/31/2022	Monthly	01/15/2023	Submitted	0	7
	11/01/2022 - 11/30/2022	Monthly	12/15/2022	Not Started	0	0
	10/01/2022 - 10/31/2022	Monthly	11/15/2022	Submitted	0	0
	09/01/2022 - 09/30/2022	Monthly	10/15/2022	Submitted	0	0
	08/01/2022 - 08/31/2022	Monthly	09/15/2022	Submitted	0	0
	07/01/2022 - 07/31/2022	Monthly	08/15/2022	Submitted	0	0
	06/01/2022 - 06/30/2022	Monthly	07/15/2022	Submitted	0	0

Tonya Wolfe
Information Technology Unit
Water Quality Program
(360) 407-7097
(800) 633-6193/Option 3

From: Cole Conley <cole.conley@lennar.com>
Sent: Monday, January 30, 2023 10:16 AM
To: Wolfe, Tonya (ECY) <TWOL461@ECY.WA.GOV>
Cc: Aaron Karlsen <karlsena@aks-eng.com>; Tammy Moad <moadt@aks-eng.com>
Subject: RE: DMR submission question

WAR306634

Thanks,

Cole Conley
Division Environmental Manager

LENNAR

Mobile: 360.946.1730
Cole.conley@Lennar.com

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From: Wolfe, Tonya (ECY) <TWOL461@ECY.WA.GOV>
Sent: Monday, January 30, 2023 10:14 AM
To: Cole Conley <cole.conley@lennar.com>
Cc: Aaron Karlsen <karlsena@aks-eng.com>; Tammy Moad <moadt@aks-eng.com>
Subject: RE: DMR submission question

What is the permit number? Thanks

Tonya Wolfe
Information Technology Unit
Water Quality Program
(360) 407-7097
(800) 633-6193/Option 3

From: Cole Conley <cole.conley@lennar.com>
Sent: Monday, January 30, 2023 10:09 AM
To: Wolfe, Tonya (ECY) <TWOL461@ECY.WA.GOV>
Cc: Aaron Karlsen <karlsena@aks-eng.com>; Tammy Moad <moadt@aks-eng.com>
Subject: DMR submission question

Hi Tonya,

I have a question regarding DMR reporting, it seems our November submission for Ridgefield heights is missing discharge points. Is there any way we can go back in and change / add a submission for that month?

Let me know if that would be possible please.

Thank you,

Cole Conley

Division Environmental Manager

LENNAR

Mobile: 360.946.1730

Cole.conley@Lennar.com

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From: [Johnson, Brian \(ECY\)](#)
To: [Cole Conley](#)
Subject: Re: November DMR WAR306634
Date: Tuesday, January 31, 2023 10:26:58 AM
Attachments: [image001.png](#)

This Message Is From an External Sender
This message came from outside your organization.

[Report Suspicious](#)

Hi Cole,

At this point, making notes on the following month's DMR explaining the situation will take care of that.

Thanks,

Brian

Get [Outlook for iOS](#)

From: Cole Conley <cole.conley@lennar.com>
Sent: Monday, January 30, 2023 12:49:54 PM
To: Johnson, Brian (ECY) <BRJO461@ECY.WA.GOV>
Subject: RE: November DMR WAR306634

If we are unable to update it online, would we be able to keep documents on site for that month?

Thanks,

Cole Conley
Division Environmental Manager

Mobile: 360.946.1730
Cole.conley@Lennar.com

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From: Cole Conley
Sent: Monday, January 30, 2023 12:29 PM
To: Johnson, Brian (ECY) <BRJO461@ecy.wa.gov>
Subject: November DMR WAR306634

Hi Brian,

I spoke with Tonya at your office and she recommended I reach out to you. We are having issues getting the correct DMR information into Paris. We are unable to go in and add discharge points to the November DMR report because it had already been submitted by the previous permit holder and December has been submitted.

Is there any way we can re-submit or edit the November DMR to include all discharge points?

Thanks,

Cole Conley
Division Environmental Manager



Mobile: 360.946.1730
Cole.conley@Lennar.com

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Washington State Department of Ecology

Discharge Monitoring Report (DMR)

Page: 1 of 1

Permit Number: WAR306634

Permittee: Ridgefield Heights

Facility County: Clark

Receiving Waterbody:

Monitoring Period: 11/01/2022 - 11/30/2022

Outfall: 5 - Gee Creek

Version: 3

Week	Monitoring Point	Turbidity (NTU) Measured NTU Weekly Grab	pH Standard Units Weekly Grab
		5	5
1-Sa	11/5/22	149.0	7.7
2-T	11/8/22	82.6	7.9
3-Su	11/13/22	C	C
4-T	11/22/22	45.4	7.5
5-T	11/29/22	27.0	7.9
Minimum			6.5
			BM: >= 6.5 (RO)
Maximum		25	8.5
		BM: <= 25 (RO)	BM: <= 8.5 (RO)

Reporting Codes Used: C - No Discharge

Overall DMR Notes/Comment

DMR reports for this month were originally submitted by Rotschy (Paul Hanson) as AKS Engineering was awaiting access to submit DMRs. Rotschy did not coordinate with AKS Engineering prior to submitting the report for November. The stormwater ponds 1, 2 & 3 were being monitored by AKS as of 10/25/2022 and all results have been reported on a weekly basis to the client (Lennar). AKS inputted data for monitoring point 5 gee creek on 1/30/2022 for the month of November but are still awaiting access to monitoring points Tract B#2 and Tract C#3 prior to December 1st.

BMPs

Monitoring Point	Week	BMP
5		Other

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 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.

Aaron Searcy

1/31/2023 5:53:34 PM

Signature

Date

ATTACHMENT G

November 2022 DMR



Permit Number: WAR306634

Permittee: Ridgefield Heights

Facility County: Clark

Receiving Waterbody:

Monitoring Period: 11/01/2022 - 11/30/2022

Outfall: 5 - Gee Creek

Version: 1

Week	Monitoring Point	Turbidity (NTU) Measured NTU Weekly Grab	pH Standard Units Weekly Grab
		5	5
Minimum			BM: >= 6.5 (RO)
Maximum		BM: <= 25 (RO)	BM: <= 8.5 (RO)

Reporting Codes Used: C - No Discharge

Overall DMR Notes/Comment

Reporting Code: C - No Discharge

Outfall: 5 - Gee Creek

Monitoring Point	Parameter	Sample Date/ Statistical Base	Value	Notes/Comment
5	All Parameters		C	

BMPs

Monitoring Point	Week	BMP
5		Silt Fence

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 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.

Paul Hanson

12/6/2022 9:28:56 AM

Signature

Date