DEPARTMENT OF TRANSPORTATION
NORTH REGION CONSTRUCTION
WILLITS FIELD OFFICE
300 EAST HILL ROAD
WILLITS, CA 95490
PHONE (707) 456-1900
FAX (707) 456-1910

Serious drought.
Help save water!

April 25, 2014

01-262004
MEN-101-R69.4/R78.9KP
CONSTRUCT WILLITS BYPASS
Sent via E-mail

Mr. Brendon Thompson
North Coast Water Quality Control Board
5550 Skylane Blvd. Suite A
Santa Rosa, CA

RE: Letter of Response to NCRWQCB April 2, 2014 Inspection Report

Dear Mr. Thompson:

On April 15, 2014 our office received your email summary of the site inspection you performed on April 2, 2014 which included a list of corrective actions needed to improve soil stabilization and erosion control. While the project SWPPP monitoring and inspection program is the primary tool that Caltrans and the Contractor use to evaluate the effectiveness of onsite sediment and erosion control practices, we do appreciate the recommendations and guidance provided during our joint inspections.

It is expected that BMPs will need to be added, maintained, modified, or replaced through the rainy season to enhance the performance of existing BMPs or, add additional BMPs due to unanticipated run-on or run-off. Therefore, we are in agreement that current condition and effectiveness of some BMPs observed during our joint inspection could be improved by addressing the corrective actions identified in your inspection report.

However, we do not believe that the initial BMPs planned for installation in preparation for the rainy season were 'inadequate'. Temporary and permanent application of Bonded Fiber Matrix (BFM), fiber rolls, and hydro seed included in the design plans and the approved project SWPPP suitable for both the slope angle and lengths over which they were installed (*Caltrans Construction Site BMP Manual, 2003*). However, several factors such as soil preparation prior to installation (e.g., compaction, track walking), lack of precipitation to promote seed germination after hydroseed application, and maintenance schedule may have contributed to a decrease in the anticipated performance of some BMPs installed onsite.

According to the project SWPPP inspection reports prepared by the WPCM the 'quick-fix' BMPs (e.g., plastic, storm water pumping and disposal) have been implemented because site conditions do not allow the slope repairs necessary to maintain existing BMPs or install additional BMPs to control concentrated run-off.

We anticipate that the existing BMPs in addition to the corrective actions described in the attached photos will provide adequate soil stabilization and erosion control for the frequency and amount of precipitation that is anticipated to occur for the remainder of the current rainy season.

Please find the attached photos and summary of corrective actions included in your April 15, 2014 email and attached inspection photos.

Sincerely,

(Ragu Thangavelautham)

for GEOFFREY T. WRIGHT
Senior Resident Engineer

Enclosure
(1) Photo Summary of Corrective Actions
(2) Timeline of Notification and Clean-up of Oil Leak at Schuesters

GTW/sjh

EA:	01-262004	Co-Rte-KP/PM:	01-MEN-101 R69.4/R78.7
EFIS:	01 0000 0005	Resident Engineer:	Geffrey Wright
Contractor:		Response Author:	
WDID No:	1B12045WNME	Inspection Date:	April 2, 2014

Agency Reviewing: North Coast Regional Water Quality Control Board

Agency Reviewer: Brendon Thompson and Kason Grady

File Name			
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

"U1, Line," Photo 1 through Photo 19, West of Hwy 101, Southern-Most Project Limits, South Haehl Creek Watershed, Water Quality Monitoring Stations WQ01 and WQ03

Description: Repair in progress for permanent slope.

11

Photo 10. A close-up of gullying on the slope shown in Photo 9, with the storm water basin below.

File Name			
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

"U1, Line," Photo 1 through Photo 19, West of Hwy 101, Southern-Most Project Limits, South Haehl Creek Watershed, Water Quality Monitoring Stations WQ01 and WQ03

Description: Repair in progress for permanent slope.

12

Photo 11: A view of the gullied, finished slope with rock-lined drainage ditch, above the storm water basin. The temporary plastic was covered with muddy water, likely residual from higher basin levels. Note failing fiber rolls. Before the plastic had been placed, sediment was removed from the basin and spread over the surrounding area to provide greater basin storage volume.

File Name			
Photo Date	4/23/2014	By Int	N/A

Description: Inlet capped and removed, Repair in progress for permanent slope. "U1" area bermed with temp cover where necessary.

Water Board Comment:

"U1, Line," Photo 1 through Photo 19, West of Hwy 101, Southern-Most Project Limits, South Haehl Creek Watershed, Water Quality Monitoring Stations WQ01 and WQ03

Photo 12. A close-up view of the stormwater basin excavated last year to handle flows from the eroding finished slopes. The basin drains through a perforated drain pipe surrounded by gravel (center of photo)

13

File Name			
Photo Date	4/23/2014	By Int	N/A

Description: Inlet capped and removed, Repair in progress for permanent slope. "U1" area bermed with temp cover.

Water Board Comment:

"U1, Line," Photo 1 through Photo 19, West of Hwy 101, Southern-Most Project Limits, South Haehl Creek Watershed, Water Quality Monitoring Stations WQ01 and WQ03

Photo 13. The basin shown in Photo 12 discharges to this drainage inlet on Hwy 101 before being carried under the highway to the basin shown in Photo 21

14

File Name			
Photo Date	4/23/2014	By Int	N/A

Description: Repair in progress for permanent slope. "U1" area bermed with temp cover where necessary.

Water Board Comment:

"U1, Line," Photo 1 through Photo 19, West of Hwy 101, Southern-Most Project Limits, South Haehl Creek Watershed, Water Quality Monitoring Stations WQ01 and WQ03

Photo 14: Part of a rock and dirt stockpile approximately across from the area shown in Photo 11. Runoff from the plastic sheeting was causing erosion adjacent the edge of the sheeting.

15

File Name			
Photo Date	4/23/2014	By Int	N/A

Description: Straw mulch applied. Fiber rolls repaired.

Water Board Comment:

"U1, Line," Photo 1 through Photo 19, West of Hwy 101, Southern-Most Project Limits, South Haehl Creek Watershed, Water Quality Monitoring Stations WQ01 and WQ03

Photo 15: Standing on the shoulder of 101 looking west at the U1 line area. Failure of erosion and sediment control BMPs evident on the temporary slope. The gravel in the foreground was added after the early February 2014 rain event as a sediment control measure. This is part of the same gravel strip as shown in Photo 16.

16

File Name			
Photo Date	4/23/2014	By Int	N/A

Description: Inlet capped and removed, Repair in progress for permanent slope. "U1" area bermed with temp cover.

Water Board Comment:

"U1, Line," Photo 1 through Photo 19, West of Hwy 101, Southern-Most Project Limits, South Haehl Creek Watershed, Water Quality Monitoring Stations WQ01 and WQ03

Photo 16. Looking north along the shoulder of Hwy 101 where gravel was placed as a sediment control. The road slopes downward and the gravel extends to the location of a drain inlet (see Photo 17) that transports stormwater under the freeway to the basin shown in Photo 28.

17

File Name			
Photo Date	4/23/2014	By Int	N/A

Description: Temporary cover applied to slopes on Basin 4. Area between Basin 4 and "H" had BFM applied due to proximity to the Basin.

Water Board Comment:

Looking from the "U1, Line," Photo 1 through Photo 19, West of Hwy 101, Southern-Most Project Limits, South Haehl Creek Watershed, Water Quality Monitoring Stations WQ01 and WQ03

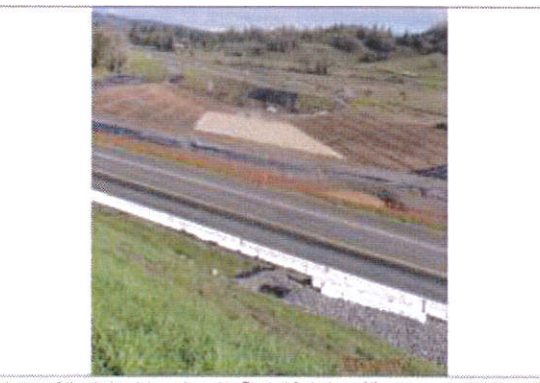


Photo 17. A view of the drain inlet mentioned in Photo 16. A view of the stormwater basin mentioned in Photo 18

18

File Name			
Photo Date	4/23/2014	By Int	N/A

Description: Temp cover applied on abutment slopes. Straw mulch applied on the exposed soil along the "H" alignment.

Water Board Comment:

Looking south east from "U1, Line," Photo 1 through Photo 19, West of Hwy 101, Southern-Most Project Limits, South Haehl Creek Watershed, Water Quality Monitoring Stations WQ01 and WQ03

Photo 19: A view across the highway, looking east, at two more areas where stormwater is stored before discharging to South Haehl Creek. The basin in the foreground discharges to Basin 1 and the one in the background discharges to both the basin in Photo 18 and during periods of overflow, directly into South Haehl Creek as described in Photo 54.

20

File Name	Install erosion and sediment controls_ Photos 20-23		
Photo Date	4/23/2014	By Int	N/A

Description: Fiber rolls installed and straw mulch applied. Fiber rolls displaced as necessary access for repair the "U2" slip out. Fiber rolls to be replaced at end operation.

Water Board Comment:

Just southeast to the area shown Uncontroled flow is eroding through previously placed applied straw erosion control. The erosion starts beyond the stockpiled material and adjacent to the highway. This concentrated flow path must be controled.

Photo 20: Just southeast of the area shown in Uncontrolled flow is eroding through previously applied straw erosion control. The erosion starts beyond the stockpiled material and adjacent the Highway. This concentrated flow path must be controlled

21

File Name	Install erosion and sediment controls_Photos 20-23		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

This Basin must be stabilized.

Description: RSP installed to stabilize slopes. Sediment at outflow of culvert from "U1" basin removed. Fiber rolls placed in perimeter areas to control run-on.

Photo 21. Looking west at Hwy 101. This basin receives all flow from the basin shown in Photo 12 and discharges into the drainage system shown in Photo 27. This basin is eroding as seen in the top left of the photo, just to the left of the rock-slope protection. This basin must be stabilized.

22

File Name	Install erosion and sediment control_Photo 20-23		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Area requires sediment and erosion control BMPs to treat stormwater run-on.

Description: Straw mulch applied. Fiber rolls to be installed to directionalize run-on away from the basin.

Photo 22: This area is just south of the main entrance-way to Area 1 and between the existing Hwy 101 and the basin shown in Photo 21. This area is without and requires erosion and sediment control. Photo 23 shows erosive conditions resulting from this uncontrolled run-on.

23

File Name	Install sediment and erosion control_Photo 20-23		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Erosion from uncontroled run-on.

Description: area hand raked, straw mulch and fiber rolls installed. Minor adjustment in fiber roll alignment addressed.

Photo 23: Just north of the basin shown in Photo 21. Erosion from uncontrolled run-on.

24

File Name	Ineffective BMP		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Sediment transport evident throughout the area despite the recently placed straw.

Description: Temporary cover placed on rilled location. Fiber rolls installed then straw mulch applied

Photo 24: Looking northeast at the "U2" fill area, just east of main entrance to Area 2. Sediment transport was evident throughout the area despite the recently placed straw erosion control.

25

File Name	BMP Maintenance Requied		
Photo Date	4/23/2014	By Int	N/A

Description: Maintenance and readjustment of gravel bag check dams added to 2035, corrective action summary sheet.

Water Board Comment:

Sediment inundated this check dam during previous storm which caused gullying .

27

Photo 26: Looking north on the U2 line toward the basin shown in Photo 27 and Photo 28. Sediment had inundated this check dam during the previous rain event and gullying occurred downstream as a result.

File Name	BMP Ineffective		
Photo Date	4/23/2014	By Int	N/A

Description: Maintenance and readjustment of gravel bag check dams added to 2035, corrective action summary sheet. RSP and light backing placed to prevent scour under HDPE culvert.

Water Board Comment:

An attempt was made to intercept drainage from the ditch shown in Photo 26 by installing the smaller plastic pipe, but storm water scoured beneath the pipe and eroded the earthen ditch immediately downstream.

28

Photo 27: West side of U2 line, looking north toward the storm water basin shown in Photo 26. An attempt had been made to intercept drainage from the ditch shown in Photo 26 by installing the smaller black plastic pipe, but storm water scoured beneath the pipe and eroded the earthen ditch immediately downstream.

File Name	Additional Corrective Actions Required_Photos 31,35,45,70		
Photo Date	4/23/2014	By Int	N/A

Description: Temporary basin 4 has all slopes covered. Maintenance of temporary cover added to 2035, corrective action summary sheet.

Water Board Comment:

Stabilize channel to accommodate concentrated flows.

Photo 31: A view of Basin 1, looking north. The channel was eroding/eroded below the outlet seen in the foreground. This channel must be appropriately stabilized to accommodate concentrated flow.

32

File Name	Stabilize Exposed Soil Areas_Photos 33 and 34		
Photo Date	4/23/2014	By Int	N/A

Description: BFM sprayed at location of exposed soil between Basin 4 and TC-2 "H" alignment

Water Board Comment:

This are must be stabilized.

Photo 33: At the top of Basin 1, southern side, looking west. This dirt area was unstabilized and eroding. This area and others around the basin must be stabilized

34

File Name	Additional Corrective Actions Required_Photos 31,35,45,70		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Area is unstabilized and eroding.

Description: Temporary basin 4 has all slopes covered. Maintenance of temporary cover added to 2035, corrective action summary sheet.

Photo 35. At the top of Basin 1, northern side, looking west. This dirt area, and the area immediately to the south at the top of the basin was unstabilized and eroding. These areas must be stabilized.

36

File Name	Stabilize and Provide Sediment Control at DS 24_Photos 40-43		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Inadequate erosion and sediment control

Description: TC-2 installed including linear barrier edge of AB.

Photo 40. Looking south toward South Haehl Creek, standing at approximately the same position used in Photo 39. Inadequate erosion and sediment control.

41

File Name	Stabilize and Provide Sediment Control at DS 24_Photos 40-43		
Photo Date	4/23/2014	By Int	N/A

Description: Straw mulch applied. Rilling inside temporary construction easement will be hand raked and temp cover placed. Work will be performed only while Water Quality Monitor on site.

Water Board Comment:

Inadequate erosion and sediment control. This area must be stabilized.

42

Photo 41 Looking south at Drainage System 24 before it enters a culvert and discharges to South Hashi Creek. There was inadequate erosion and sediment control in this area. This area must be stabilized.

File Name			
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Stabilize soil disturbance within the temporary construction easment area.

Description: Straw mulch applied. Rilling inside temporary construction easement will be hand raked and temp cover placed. Work will be performed only while Water Quality Monitor on site.

43

Photo 42: Looking southeast at Drainage System 24 before it enters a culvert and discharges to South Haehl Creek. A large gully has formed developed into the channel, as seen in the center of the photo. The steel fence is the Caltrans right-of-way fence. Caltrans staff said they were limited to fixes within their right-of-way; however, the disturbance on the other side of the fence was created by Caltrans and is Caltrans's responsibility to stabilize

File Name	Stabilize and Provide Sediment Control at DS 24_Photos 40-43		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Provide soil stabilization.

Description: Straw mulch applied. Rilling inside temporary construction easement will be hand raked and temp cover placed. Work will be performed only while Water Quality Monitor on site.

Photo 43. Looking north at Drainage System 24.

44

File Name	Provide Adequate Drainage_Photo 45		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Provide a stable drainage path. The final drainage configuration must be approved by the Regional Water Board.

Description: New Temporary cover and gravel bag check dams installed. Corrections to the implementation on 2035, corrective action form.

Photo 45. A closer view of the area shown in Photo 44, upper right. This watercourse runs into Caltrans's project limits from the Schmidbauer property, just before discharging to South Haehl Creek. Because a stable drainage path to South Haehl Creek was not planned for and provided, drainage has eroded the creek bank and transported sediment to South Haehl Creek. A stable drainage path must be provided. Plans for the final drainage configuration must be approved by the Regional Water Board. Biotechnical elements should be incorporated as appropriate.

46

File Name	Sediment Control at S. Haehl CR_Photos 54-55		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Address uncontrolled run-off to S. Haehl CR. Replace damaged silt fence.

Description: Exposed soil areas have been stabilized with plastic cover, road base, and straw. Silt fence repair completed.

55

Photo 54: There was evidence that the basin shown in Photo 19 and Photo 55 overflowed down this slope, through the silt fence, and into South Haehl Creek. Erosion can be seen in the center-right of the photo. The silt fence shown in the distance was worn and requires replacement.

File Name	Sediment Control at S. Haehl CR_Photos 54-55		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Basin overflow drains directly to S. Haehl Creek.

Description: Plastic cover placed on slopes to reduce sediment delivery to basin. Straw mulch applied between TC-2 and Temporary cover.

56

Photo 55: This basin primarily drains to Basin 1 through an inlet just to the lower right of the photo (see Photo 56), but will overflow directly to South Haehl Creek at the location in the upper left of the photo and as shown in Photo 54.

File Name	U3 Run-off Control_Photo 57		
Photo Date	4/23/2014	By Int	N/A

Description: Gravel bag berm maintained. Netting to be installed on area of exposed soil as listed on 2035, corrective action summary.

Water Board Comment:

WPCM discussed plans to remove sediment and install EC fabric and gravel bag check dams within the channel.

Photo 57. Looking north. Erosion and sediment transport and discharge off-site at the toe of slope along the U3 line. The contractor's Water Pollution Control Manager discussed plans to remove sediment and install erosion control fabric and gravel bag check dams within the channel. I do not know exactly where the off-site drainage discharges.

58

File Name	Move Sampling Point_Photo 63 and 64		
Photo Date	4/23/2014	By Int	N/A

Description: New RECP and check dams installed in ditch line adjacent to Sparetime Supply Property. Straw mulch to be applied per 2035, corrective action summary form.

Water Board Comment:

Move sampling point upstream of the confluence with water unaffected by construction activities.

Photo 62. Looking south at disturbed area south of Bent 1. This large area has generally inadequate erosion and sediment controls. This area discharges to a tributary of Baechtel Creek at the location shown in Photo 63.

63

File Name	Remove Debris_Photo 67		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Remove debris.

Description: Debris has been removed. Straw mulch to be applied per 2035, corrective action summary form.

Photo 67. Photo taken looking west at the southern boundary of Spare Time Supply. Vegetation debris is inappropriately stored in standing water and must be relocated.

68

File Name	Perimeter Control at Rutledge_Photo 68		
Photo Date	4/23/2014	By Int	N/A

Water Board Comment:

Install perimeter control.

Description: Silt fence installed. Straw mulch applied to exposed soil area between pond and DS 48.

Photo 68. Looking northeast at Rutledge Pond. No sediment control at the boundary of Rutledge Pond. Construction storm water has flowed uncontrolled into the pond all rainy season. Perimeter control must be installed.

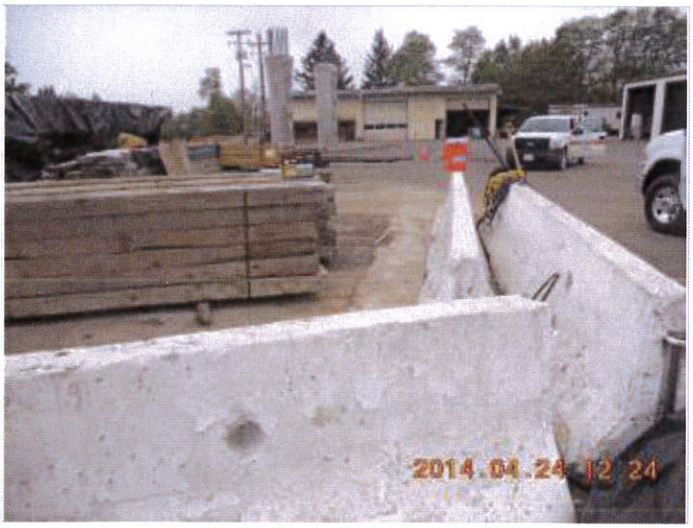
69

File Name	Oil Spill_Photos 70 and 71		
Photo Date	4/23/2014	By Int	N/A

Description: Clean up method provided by WPCM, Jim Montgomery. Area of oil spill was covered with absorbent, swept up and then vacuumed to remove as much of the contaminated absorbent as possible. All contaminated absorbent, pads, and gravel bags were disposed of in 55 gallon hazmat barrels provided by Safety Kleen, Inc. JV continuing to monitor location. Additional information on notifications, clean-up timelines is provided in Enclosure 1.

Water Board Comment:

Provide details on hydraulic line damage and clean-up efforts.



71

Photo 70: Absorbent material had been applied to absorb hydraulic fluid. Gravel bags along the perimeter appeared to have absorbed fluid. Caltrans must provide the Regional Water Board with information detailing the dates the hydraulic lines were cut as well as documentation of appropriate clean-up and disposal activities.

File Name	Oil Spill Schuesters_Photos 70 and 71		
Photo Date	4/23/2014	By Int	N/A

Description: See photo 71 response.

Water Board Comment:

Provide details on hydraulic line damage and clean-up efforts.

Photo 71: It appeared that fluid had drained from the spill area as indicated by the water mark on the asphalt. We communicated that the material, including the gravel bags must be disposed of immediately subject to appropriate hazardous waste disposal protocol. Caltrans had not been notified of the incident and potential discharge.

72

File Name			
Photo Date	4/23/2014	By Int	N/A

Description: Erosion control blanket placed on exposed soil. Gravel bag check dam maintenance performed and additional layer of bags installed.

Water Board Comment:

Baechtel Creek watershed, Water Quality Monitoring Stations WQ06 & WQ07

Photo 72: Looking northwest. Sediment discharge to Baechtel Creek at Pier 4 as a result of inadequate erosion control and failed sediment control. Erosion and sediment control must be provided

73

WILLITS BYPASS

CALTRANS INSPECTION DOCUMENTATION OF CRANE OIL LEAK NOTIFICATION AND CLEANUP OPERATIONS

Excerpts from the inspection diary of *Karen J. Spliethof CT*

- March 10, 2014 – Caltrans (Karen Splietof) received call from Jim Montgomery (WPCM) at 13:54 informing that the crane at Schuster's yard had been vandalized and the cleanup efforts were being completed. WPCM was informed that I was not on site as I was off work for a dentist appt. He was directed to notify someone on site and I would follow up with an inspection when I returned from time off.
- March 11, 2014- I arrived on site at Schuster's and noted that the crane was covered with the grey tarps that had been used throughout the season. I noted an odor but no visible sign of hydro fluid on the ground. The only evidence of spill was absorb residue where it had been cleaned. No photos taken.
- March 17, 2014- notification to the office from Alan Badillo (Flatiron) that the crane was to be serviced this shift. Rodolfo Contreras (Caltrans) was assigned to inspection.
- March 27, 2014-Nathan Hayler (Caltrop) assigned sampling this shift, Jim Montgomery and Nathan arrived at the crane and noted that absorb was on the ground with evidence of hydro leak. Jim phoned Flatiron and gave direction for clean up.
- April 2, 2014- during my post storm inspection I noted that the crane had leaked and there was contaminated absorb on the paved surface. I immediately phoned Philip with no answer at 13:05 then called Jim Montgomery (WPCM) at 13:06. I requested that crews clean the area per the contract special provisions; I returned at 17:30 inspect the status of clean-up efforts. The oil clean-up was not completed and the crews were offsite.
- April 3, 2014- we were given notification that the cleanup of the crane area was taking place. The contract special provision with clean-up requirements, the California Code of Regulations, Title 22, Division 4.5, Section 66262.34; and in CFR Title 49, Parts 261, 262, and 263 were discussed between Caltrans (Karen Splietof) and the contractor in order to provide direction on acceptable clean up requirements. The crew brought out the required containment barrel and stored the material at the yard end of shift, and was directed to provide Caltrans with a disposal manifest to follow. Gravel bags were discarded, new placed with oil booms installed at perimeter. Area around crane vacuumed. Oil residue under the crane was still visible. Crane needed to be moved to clean all of the oil from the leak. Alan (Flatiron) then stated that a mechanic was to be onsite and fix the crane so it could be moved on Monday April 7th, 2014
  NOTE: Alan Badillo (Flatiron) stated that stormwater had been entering the tank someway and that fluid was overtopping the tank onto the ground. Caltrans (Karen Splietof) asked about any vandalism and Alan stated that he was not aware of any vandalism.
- April 9, 2014- crane not moved during inspection, cover still intact.
- April 22, 2014- 19:15 light rain began with no run off. Caltrans (Karen Splietof) inspected the crane staging area, a bundle of 12x8 beams was placed over area to be cleaned. No evidence of that any cleaning was been completed. Crane was observed now working in area 8A. Inspected the crane and noted that the diapers and containment pans under the body were cleaned and leaks had been fixed.

- April 23, 2014- meeting with Philip Lapp (Flatiron, Jim Montgomery (WPCM), Shasta Vickers (Montgomery and Assoc), Samantha Hadden (Caltrans), and Karen Splitof (Caltrans) inspected the crane site. As the area is not considered clean. Oil residue is visible on pavement in several areas. Informed WPCM and Flatiron that since there is a potential for stormwater to come into contact with the residual oil stains and then be discharged to the adjacent surface water (Baechtel Creek) non-visible pollutant sampling will be required at the receiving water discharge point if visible run- off occurs during storm events. This sampling done until the cleanup is completed. Or, relief is granted from the NCRWQCB. As an additional protective measure the WPCM recommended plastic cover and oil booms be placed on the largest oil stained area until a cleanup plan could be implemented or SWB relief is granted.