



North Carolina Department of Environment and Natural Resources  
**Division Energy, Mineral, and Land Resources**  
**Land Quality Section**

Tracy E. Davis, PE, CPM  
Director

Pat McCrory, Governor  
Donald van der Vaart, Secretary

March 12, 2015

City of Greenville  
Attention: Scott Godefroy, PE  
PO Box 7207  
Greenville, NC 27835

Subject: Sedimentation and Erosion Control Local Program Review

Dear Mr. Godefroy:

On January 27, 2015, Pat McClain and Karyn Pageau conducted a review of the City of Greenville's Local Program. One staff member contributes one full time equivalent to the erosion control program. The county has 7 active projects and has reviewed 18 plans, with 18 approvals and 6 disapprovals. The county has conducted 36 inspections, has issued 1 notice of violations, and assessed no civil penalties in the past 12 months. We reviewed four projects. Three out of the four projects had violations and were considered out of compliance during the field portion of the review. The City had previously noted several violations on two of the three sites and one was currently under a Notices of Violations prior to our site visit. The City has been working with the Washington Regional Office and is showing better practices for administering their Erosion and Sediment Control Program since they had been placed on probation back in 2012.

The following is a summary of the projects that were inspected:

**1. Kittrell Place Apartments**

This site is a 6.2 acre multi-family residential project. The file for this project included a FRO, inspection reports, correspondence and an approval letter. The erosion and sediment control plan was approved and was adequate. The last inspection was conducted on 1/23/2015 and the site was called out of compliance. The site has not received a Notice of Violations. The site was active at the time of the inspection and was out of compliance. Violations included: failure to follow approved plan, failure to provide adequate groundcover, and failure to maintain erosion control measures.

Corrective Actions:

- 1) Maintain and provide additional stone at inlets.
- 2) Provide groundcover along perimeter berm and slopes of stockpile.
- 3) Maintain construction entrance and perimeter silt fence.

Comment: Provide adequate ground cover on all bare and inactive areas. Provide concrete washout area to dispose of concrete waste.

## **2. Unity Free Will Baptist Church**

This site is a 14.0 acre commercial project. The file for this project included a FRO, inspection reports, correspondence, 401 and USACE authorization letters, deed, check and an approval letter. The file did not contain the calculations (but these were accessible digitally) nor a landowner consent agreement. The erosion and sediment control plan was approved and was adequate. The last inspection was conducted on 1/22/2015 and the site was called out of compliance and under a Notice of Violations. The site was active at the time of the inspection and was not in compliance. Violations included failure to follow approved plan, failure to provide adequate groundcover, insufficient measures to retain sediment on site, failure to take all reasonable measures, and failure to maintain erosion control measures.

Corrective Action needed:

- 1) Provide inlet protection at curb inlets at the construction entrance.
- 2) Provide groundcover on basin slopes and along perimeter of site.
- 3) Remove sediment from roadside ditch and at the stream crossing.

Comment:

- 1) Installation of fire hydrants near top of slope along roadside ditch has led to slight offsite deposition.
- 2) Provide adequate ground cover on all bare and inactive areas.

## **3. Lot 6 Block A Firetower Junction**

This site is a 1.7 acre commercial project. The file for this project included adequate documentation in support of the erosion and sedimentation control plan of approval. The last inspection was conducted on 1/23/2015 and the site was called in compliance. The site has not received a Notice of Violations. The site was not active at the time of the inspection and was in compliance.

Comment:

- 1) Continue to oversee to establish a dense stand of vegetation.

## **4. Save-A-Lot**

This site is a 2.4 acre commercial project. The file for this project included adequate documentation in support of the erosion and sediment control plan that was approved. The last inspection was conducted on 1/23/2015 and the site in compliance. The site has not received a Notice of Violations. The site was active at the time of the inspection and was in not in compliance. Violations include: failure to follow approved plan, insufficient measures to retain sediment on site, failure to take all reasonable measures, and failure to maintain erosion control measures.

Corrective Actions:

- 1) Provide revised plan for additional disturbance on adjacent lot.
- 2) Provide stabilization immediately or sediment control downstream of berm along adjacent building pad area that is not within the permitted footprint.
- 3) Provide maintenance of perimeter silt fence.
- 4) Remove offsite sediment from road and protect downstream storm drain.

Comments:

- 1) Provide adequate ground cover on all bare and inactive areas.
- 2) Provide concrete washout area onsite for concrete waste.

**Conclusion:**

The City of Greenville Local Program is visiting sites on a frequent basis, which is appreciated. The local program should implement the following recommendations to improve the program:

- 1) Continue to check for self-inspection records on site.
- 2) Remember to implement all of the new NPDES requirements in your plans, including concrete washout locations and details on the drawings.
- 3) Remember that when the financial responsible party and the landowner are not the same entity that a landowner authorization letter is required prior to approving the erosion and sediment control plan. We recommend that this letter be signed and notarized and mirror the City's ordinance or the General Statutes.

A summary of the review will be presented to the Sedimentation Control Commission (SCC) on May 20, 2015. Staff will recommend continued program delegation. Thank you again for the efforts of you and your staff to protect the State's waters from sedimentation.

Sincerely,

Karyn Pageau, EIT, CPESC  
Assistant State Sedimentation Specialist

Ashley Rodgers, PE  
State Sedimentation Specialist

cc: Pat McClain, PE, Regional Engineer, Washington Regional Office



Kittrell Place - Soil stockpiles and perimeter berm (on left) should be vegetated.



Save A Lot – Additional unpermitted disturbed footprint on right sloping to street lacks sufficient sediment controls. Sediment observed in downstream storm drain.



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Land Quality Section

Tracy E. Davis, PE, CPM  
Director

Pat McCrory, Governor  
Donald van der Vaart, Secretary

March 12, 2015

Pitt County  
Attention: Jonas Hill  
1717 West 5<sup>th</sup> Street  
Greenville, NC 27834

Subject: Sedimentation and Erosion Control Local Program Review

Dear Mr. Hill:

On January 28, 2015, Pat McClain and Karyn Pageau conducted a review of the Pitt County Local Program. Three staff members contribute 2.5 full time equivalents to the erosion control program. The county has 12 active projects. During the past year, the County has reviewed fourteen plans, with fourteen approvals and no disapprovals, and has conducted 50 inspections. The County has not issued any notices of violations nor has it assessed any civil penalties in the past 12 months. Of the four projects that were reviewed, 3 were in compliance. Two sites were in the Neuse and two in the Tar-Pamlico River Basins.

The following is a summary of the projects that were inspected:

**1. Whitaker Glen, Section 2**

This site is a 16.3 acre residential project. The file contained adequate documentation. The erosion and sediment control plan was approved and was adequate. The last inspection was conducted on 1/23/2015 and the site was called in compliance. The site has not received a Notice of Violations. The site was active at the time of the inspection and was in compliance.

Comment: Extend construction entrance. Provide adequate ground cover on all bare and inactive areas. Roadside ditches should be stabilized immediately, as drain to offsite State Road ditch.

**2. Oak Pointe**

This site is an 8.1 acre residential project. The file for this project included adequate documentation. The erosion and sediment control plan was approved and did not have adequate protection along the riparian buffer. The last inspection was conducted on

1/23/2015 and the site was called in compliance. The site has not received a Notice of Violations. The site was active at the time of the inspection and was in compliance.

Comment: Stabilization of the roadside ditch and areas upstream are needed to minimize sedimentation potential to State Road ditch at construction entrance. Provide adequate ground cover on all bare and inactive areas.

### **3. Lemon Grass**

This site is a 1.2 acre commercial project. The file for this project included adequate documentation. The erosion and sediment control plan was approved and was adequate. The last inspection was conducted on 1/23/2015 and the site was called in compliance. The site has not received a Notice of Violations. The site was active at the time of the inspection and was found out of compliance. The violations found were: failure to follow approved plan, insufficient measures to retain sediment on site, failure to take all reasonable measures, and failure to maintain erosion control measures.

Corrective Actions: 1) Provide construction entrance on Fire Tower Road per plan. 2) Re-install silt fence on four sides of lot. 3) Install inlet protection around yard inlets per plan. 4) Remove offsite/off tract deposition along Fire Tower Road and curb of shopping center.

Comments: Provide adequate ground cover on all bare and inactive areas. Provide concrete washout area to dispose of concrete waste on site (sidewalk installation).

### **4. Rams Horn Solar Farm**

This site is an 8.0 acre commercial project. The file for this project did not include adequate documentation. The erosion and sediment control plan was approved and was not adequate. The last inspection was conducted on 1/23/2015 and the site was called in compliance. The site has not received a Notice of Violations. The site was active at the time of the inspection and was found in compliance.

Comments: Panel construction appears to be complete. Continue to monitor site for dense stand of vegetation. Continue to maintain silt fence and remaining measures until stabilization is achieved.

### **Conclusion:**

The Pitt County Local Program is visiting sites on a frequent basis, which is appreciated. The local program should implement the following recommendations to improve the program:

- 1) Continue to check for self-inspection records on site and to implement NPDES requirements on your plans.

- 2) Remember to acquire written landowner consent to “permit and construct” land disturbing activity from the Financially Responsible Parties when they are not the same on the application.
- 3) Recommend providing additional sediment controls along perimeter of land disturbing activity, at a minimum silt fence should be provided along low sides of limits of disturbance on all sites for perimeter containment until permanent groundcover is established. Sediment traps/skimmer basins should be implemented on more sites. Concerns were brought up about the surface dewatering requirement indicated in the NCG01 Construction Stormwater Permit.
- 4) Based on site topography, there were/are situations where installing skimmers/flashboard risers are restrictive. In some situations, easements with adjacent property owners would have to be acquired to allow enough gradient to discharge positively. This issue is being discussed/reviewed internally within NCDENR as it has implications on many sites in the eastern/southern portions of our state.

A summary of the review will be presented to the Sedimentation Control Commission (SCC) on May 7, 2015. Staff will recommend continued program delegation. Thank you again for the efforts of you and your staff to protect the State’s waters from sedimentation.

Sincerely,

Karyn Pageau, EI, CPESC  
Assistant State Sedimentation Specialist

Ashley Rodgers, PE  
State Sedimentation Specialist

cc: Pat McClain, PE, Washington Regional Engineer





Whitaker Glen, Section 2 – Ditches, stockpile areas, and other areas on site are bare.



Oak Pointe - Roadside ditches have check dams but no groundcover.





Lemongrass Restaurant – Perimeter silt fence removed prematurely. Fabric inlet protection utilized instead of hardware cloth and gravel. Deposition on Fire Tower Road.



Rams Horn Solar Farm – Silt fence remaining until dense stand of permanent vegetation is established.



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Director

Pat McCrory, Governor  
Donald van der Vaart, Secretary

March 12, 2015

Guilford County  
Attention: Earl Davis  
PO Box 3427  
Greensboro, NC 27402

Subject: Sedimentation and Erosion Control Local Program Review

Dear Mr. Davis:

On February 23, 2015, Tim Latham and Karyn Pageau conducted a review of the Guilford County Local Program. Two staff members contribute 2 full time equivalents to the erosion control program. The county has 98 active projects. During the past year, the County has approved 31 plans and disapproved 18, for a total of 48 plan reviews. The County has conducted 674 inspections. The County has issued five notices of violation, four stop work orders, and no civil penalties in the past 12 months. Four projects were reviewed in the office, but only three in the field. All three sites were out of compliance.

The following is a summary of the projects that were inspected:

**1. Big Boy Solar Farm**

This site is a 10.3 acre commercial project. The file contained adequate documentation. The erosion and sediment control plan was approved. Some calculations were missing as well as wood posts shown on the plan silt fence detail. This site had not been inspected previously. The site was active at the time of the inspection and was not in compliance. The violations found were: failure to follow approved plan, failure to take all reasonable measures, and failure to maintain erosion control measures.

Corrective Actions: Provide copy of revised plan for additional footprint disturbed. Overseed/stabilize all bare and inactive areas. Re-install silt fence along perimeter of project. Provide copy of NPDES/Self-Inspection records. Stabilize slopes of basin.

Comment: Provide adequate ground cover on all bare and inactive areas. Steel posts were used to install silt fence onsite.

## **2. Dollar General**

This site is a 1.5 acre commercial project. The file for this project included adequate documentation. The erosion and sediment control plan was approved and was adequate. The last inspection was conducted on 2/2/2015 and the site was not in compliance. The site has not received a Notice of Violations. The site was active at the time of the inspection and was not in compliance. The violations found were: failure to follow approved plan.

Corrective Actions: Install temporary basin #1 to dimensions proposed on the approved plan. Provide groundcover/rolled erosion control product downstream of basin at corner of Sharpe/Lee Street and for utility installation along Sharpe Street near construction entrance. Provide copy of NPDES/Self-Inspection records. Seed, mulch, and tack basins, diversions, and other bare areas around site.

Comment: Several corrective actions had been taken since previous inspection report.

## **3. Autumn Village**

This site is a 10.9 acre residential project. The file for this project did not include adequate documentation, landowner consent was not included in the file. The erosion and sediment control plan was approved in 2009 and was adequate. The last inspection was conducted on 2/4/2015 and the site was called out of compliance. The site has received a Notice of Violations dated 8/3/10. The site was active at the time of the inspection and was compliance. The violations found were: failure to follow approved plan, failure to provide adequate groundcover, failure to take all reasonable measures, and failure to maintain erosion control measures.

Corrective Actions: Conduct maintenance on sediment fence downstream of current lots under construction. Maintain catch basins near stream crossing. Install silt fence downstream of stockpile and stabilize stockpile slopes. Install inlet protection at unprotected catch basins. Provide copy of NPDES/Self-Inspection records.

Comments: Provide adequate ground cover on all bare and inactive areas. Provide concrete washout area to dispose of concrete waste on site.

## **Conclusion:**

The Guilford County Local Program is visiting sites on a frequent basis, which is appreciated. The local program should implement the following recommendations to improve the program:

- 1) Continue to check for self-inspection records on site and to implement NPDES requirements on your plans.
- 2) Remember to acquire written landowner consent to “permit and construct” land disturbing activity from the Financially Responsible Parties when they are not the same on the application.

Guilford County  
March 12, 2015  
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A summary of the review will be presented to the Sedimentation Control Commission (SCC) on May 7, 2015. Staff will recommend continued program delegation. Thank you again for the efforts of you and your staff to protect the State's waters from sedimentation.

Sincerely,

Karyn Pageau, EI, CPESC  
Assistant State Sedimentation Specialist

Ashley Rodgers, PE  
State Sedimentation Specialist

cc: Matt Gantt, PE, Winston-Salem Regional Engineer





Big Boy Solar Farm – Denuded area beyond previously approved limits of disturbance.



Dollar General – Basin installed was smaller than that called for on approved plans.