



Energy, Mineral
and Land Resources
ENVIRONMENTAL QUALITY

PAT MCCRORY

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Director

April 25, 2016

City of Raleigh
Attention: Benjamin Brown
PO Box 590
Raleigh, NC 27602

Subject: Sedimentation and Erosion Control Local Program Review

Dear Mr. Brown:

On February 9, 2016, Karyn Pageau conducted a review of the City of Raleigh Local Program. Fourteen staff members contribute 10 full time equivalents to the erosion control program. The county has 254 active projects. During the past year, the City has reviewed 586 plans, with 169 approvals and 400 disapprovals, and has conducted 7,263 inspections. The City has issued 57 notices of violations and has assessed 7 civil penalties in the past 12 months. **Four projects were reviewed.**

The following is a summary of the projects that were inspected: Conditions: cold-30s, wet, workable

1. **Crabtree Commons** (*submitted 5/13/13, approved 12/30/13*) *disapproved 4 times*

This site is a 12.8 acre commercial project. The file for this project was adequate. The erosion and sediment control plan was approved and was adequate. The last inspection was conducted on 1/28/2016 and the site was out of compliance. The site was under a Notice of Violations. The site was active at the time of the inspection and was **out** of compliance. The violations found were: failure to follow approved plan, failure to provide adequate groundcover, insufficient measures to retain sediment on site, failure to take all reasonable measures, unprotected exposed slopes, and failure to maintain erosion control measures.

Corrective Actions: 1) Maintain construction entrance, additional clean stone is needed. 2) Provide sediment control for stockpile areas. 3) Remove sediment from street. 4) Maintain silt fence, inlet protection, and install silt fence upstream of curb.

Comment: Provide adequate ground cover on all bare and inactive areas. Concrete washout area needed.



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2. **Greenway Village, Phase 2** – *(submitted 11/12/14, approved 2/3/15) disapproved 3 times*

This site is a 7.2 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 1/21/2016 and the site was in compliance. The site has received a Notice of Violations that was closed at the 1/21/16 inspection. The site was active at the time of the inspection and was **out** of compliance. The violations found were: failure to follow approved plan, failure to provide adequate groundcover, insufficient measures to retain sediment on site, failure to take all reasonable measures, inadequate buffer zone, graded slopes and fills too steep, unprotected exposed slopes, and failure to maintain erosion control measures.

Corrective Actions: 1) Maintain construction entrance, additional clean stone is needed. 2) Provide/Maintain inlet protection at all inlets. 3) Maintain perimeter silt fence and provide additional silt fence outlet along Horton Street. 4) Remove sediment from streets and from inlet that drains to buffer zone. 5) Provide groundcover on slopes.

Comment: Provide adequate ground cover on all bare and inactive areas.

3. **Ample Storage** – *(submitted 1/7/15, approved 5/15/15) disapproved 3 times*

This site is a 7.6 acre commercial project. The file for this project did contain adequate documentation. The erosion and sediment control plan was approved and was adequate. The last inspection was conducted on 1/27/16 and the site was found in compliance. The site has not received a Notice of Violations. The site was not active at the time of the inspection and was **out** of compliance. The violations found were: failure to follow approved plan, failure to provide adequate groundcover, insufficient measures to retain sediment on site, failure to take all reasonable measures, graded slopes and fills too steep, unprotected exposed slopes, and failure to maintain erosion control measures.

Corrective Actions: 1) Maintain construction entrance, addition clean stone is needed. 2) Provide additional clean stone at yard inlets. 3) Maintain perimeter silt fence and silt fence outlets. Remove offsite sediment and stabilize resulting areas. 4) Provide groundcover at sanitary sewer crossing, retaining wall, perimeter slope, and basin slopes at inlet.

Comments: Provide adequate ground cover on all bare and inactive areas.

4. **Bryson Village, Phase 7** – *(submitted 10/11/13, approved 8/8/14) disapproved 3 times*

This site is a 46.5 acre multi-family residential project. The file for this project did contain adequate documentation. The erosion and sediment control plan was approved and was adequate. The last site inspection was on 1/27/16 and the site was found in 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. The violations found were: failure to follow approved plan, failure to provide adequate groundcover, insufficient measures to retain sediment on site, failure to take all reasonable measures, unprotected exposed slopes, and failure to maintain erosion control measures.

Corrective Actions: 1) Maintain sediment basins, inlet protection, silt fence, and silt fence outlets. 2) Provide groundcover on slopes. 3) Remove offsite sediment and stabilize resulting areas.

Comments: Provide adequate ground cover on all bare and inactive areas. A revised plan is needed to address sediment control downstream of basin at the sewer outfall.

Letter of Approval
George B Ratchford
April 21, 2016
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Conclusion:

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

- 1) Continue requiring that adequate ground cover is provided within the time limits of the NPDES permit and the approved plan.
- 2) Continue to check for self-inspection records on site.

A summary of the review will be presented to the Sedimentation Control Commission (SCC) on May 5, 2016. 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: John L. Holley, Jr., PE, CPESC, Raleigh Regional Engineer
Joe Dupree, Senior Environmental Specialist



Site 1 – Mud in streets onsite leading to some tracking on offsite street.



Site 2 - Inlet protection needs to be maintained.



Site 3 – Perimeter silt fence needs maintenance adjacent to retaining wall.



Site 4 – Perimeter silt fence needs maintenance along sanitary sewer easement.