

# Erosion Control Plan Review, Inspection & Enforcement Standard Operating Procedures (Updated 2/1/2021)

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1	General Overview .....	3
2	Compliance Standards .....	3
3	Compliance Timelines .....	3
3.1	Low Risk.....	3
3.2	Imminent Risk .....	3
4	Private Development with No Public Improvement or Water Quality Facility Construction .....	4
4.1	Permits .....	4
4.1.1	Construction where a DEQ 1200-C permit is not required .....	4
4.1.2	Construction requiring a DEQ 1200-C permit .....	4
4.2	EPSC Plan Review .....	5
4.2.1	Construction where a DEQ 1200-C permit is not required, including SFRC .....	5
4.2.2	Construction requiring a DEQ 1200-C permit .....	5
4.3	Inspections .....	5
4.3.1	Initial Inspection:.....	5
4.3.2	Interim Inspection(s):.....	6
4.3.3	Final Inspection: .....	6
4.4	Documentation .....	6
5	Capital Improvement Projects (CIP's) and Private Development with Public Improvement or Water Quality Facility Construction .....	7
5.1	Permits .....	7
5.2	EPSC Plan Review .....	7
5.2.1	Construction where a 1200-C permit is not required .....	7
5.2.2	Construction requiring a 1200-C permit .....	7
5.3	Inspections .....	8
5.4	Documentation .....	8
5.4.1	Additional Requirements for City held 1200-C permits.....	8
6	Permit termination Requirements for sites with a 1200-C permit .....	8
6.1	Private 1200-C permits .....	9

7	Citizen Concerns & Code Compliance Referrals .....	9
8	Enforcement Protocol.....	9
8.1	Enforcement Authority .....	9
8.2	Enforcement .....	9
	Step 1: Notice to Correct (NTC) .....	9
	Step 2: Notice of Violation (NOV) .....	10
	Step 3: Stop Work Order.....	10
	Step 4: Civil Penalty.....	10
	Step 5: Abatement.....	10
	Appendix 1: EPSC Inspector Checklist.....	
	Appendix 2: Standard SFRC EPSC Plan .....	
	Appendix 3: Pollution Prevention Notice.....	
	Appendix 4: Notice of Civil Penalty.....	

## **1 General Overview**

This document is a Standard Operating Procedure for Erosion Prevention and Sediment Control (EPSC) plan review, inspection, documentation, and enforcement. Staff will use this SOP to ensure construction site compliance with the City of Gresham's EPSC Manual and applicable National Pollutant Discharge Elimination System (NPDES) 1200-C permit requirements.

This document will be reviewed by staff periodically and adapted if necessary to reflect changes in City departments, staffing responsibilities and procedures as appropriate. The City will provide training for new personnel who utilize this document and will also provide training for all affected employees whenever there is a significant update to program requirements or procedures.

## **2 Compliance Standards**

Minimum requirements for EPSC Best Management Practices (BMP) are outlined in the following chapters of the EPSC Manual.

- Chapter 2 - Single Family Residential Construction (SFRC)
- Chapter 3 - All other development

The minimum BMP's are also listed on the EPSC Inspector Checklist, which is a reference document for the Public Works Inspector (PWI) and Watershed staff to use during inspections, Appendix 1.

## **3 Compliance Timelines**

Regardless of the type of construction, inspectors will use the following timelines based on the risk of noncompliance. In certain circumstances, the inspector will use best professional judgment to determine an appropriate timeframe for compliance.

### **3.1 Low Risk**

Low risk occurs when there is any missing, broken, or unkempt BMP element that will not impact the public stormwater system within 24-hours but, if not remedied, may eventually allow sediment to travel to the public stormwater system or stream.

The timeframe for remediation for a low risk noncompliance is typically 24 to 48 hours. If the risk is minimal, the inspector may extend the compliance timeframe based on the weather forecast and site conditions. The inspector may use best professional judgment to extend initial compliance timeframes, if the responsible party needs additional time and the site continues to be considered low risk.

### **3.2 Imminent Risk**

Imminent risk occurs when there is any missing, broken, or unkempt BMP element that is allowing sediment to enter the public stormwater system or stream, or that may allow sediment to enter the public stormwater system or stream within 24 hours.

The contractor must take action to correct imminent risk noncompliance either immediately or within 24 hours.

## **4 Private Development with No Public Improvement or Water Quality Facility Construction**

The information in this section applies to SFRC and all commercial and private construction projects that do not require privately-financed public improvement or a water quality facility construction. These projects may include a building component, or may be limited to grading only.

### **4.1 Permits**

#### **4.1.1 Construction where a DEQ 1200-C permit is not required**

For sites less than one-acre a DEQ 1200-C permit is not required. In phased developments, the one-acre threshold is determined based on the anticipated aggregate disturbed area of all phases.

The contractor is responsible for securing City of Gresham requisite building and grading permits prior to starting work. The Building Department issues permits for approved construction and grading, and tracks project information in EnerGov (the City's online permit tracking software).

#### **4.1.2 Construction requiring a DEQ 1200-C permit**

The project owner is responsible for obtaining and complying with the 1200-C permit, as required by DEQ. It is the project owner's responsibility to confer with DEQ.

Projects that typically require 1200-C permit include:

- Construction activities that will disturb one or more acres.
- Construction activities that will disturb less than one acre that are part of a common plan of development that will ultimately disturb one or more acres.
- Other construction activity designated by DEQ, as detailed in the 1200-C permit.

If City staff become aware of a project subject to DEQ 1200-C requirements, where the project does not have coverage, staff will inform the project owner of the requirement. In addition, staff will refer the project to DEQ within seven days of making such a determination.

Referrals will include:

- Project location
- Developer
- Estimated overall project size and area of land disturbance
- Records of communication with the developer regarding filing requirements

The project owner is also responsible for securing all City of Gresham permits as described in 4.1.1.

## 4.2 EPSC Plan Review

### 4.2.1 Construction where a DEQ 1200-C permit is not required, including SFRC

The **Standard SFRC EPSC Plan** and the **Pollution Prevention Notice** are provided to the contractor as part of the Building Department permit packet and are included as Appendix 2 and 3 for reference. The permit center will ensure that the SFRC EPSC plan is completed and signed prior to issuance of a building or grading permit. PWI will also keep a copy of the EPSC plan template in their vehicle for reference during inspection.

PWI and Watershed staff will work with contractors to adaptively manage sites and will require additional EPSC measures if necessary to ensure that all sediment or pollutants are properly contained onsite.

### 4.2.2 Construction requiring a DEQ 1200-C permit

In cases where a DEQ 1200-C Permit is required as described in 4.1.2 above, DEQ will require a erosion and sediment control plan (ESCP) prior to issuance of the 1200-C permit. The City is not an agent of DEQ and does not review the ESCP for private construction projects prior to implementation; however, the City will use the permittee's ESCP as a guidance document during site inspection.

## 4.3 Inspections

The City's Stormwater Management Plan (SWMP) sets a goal of a minimum of three inspections at each private construction or grading site. Inspection procedures are described below and apply to sites with land disturbances of 1,000 square-feet or greater, as required by the City's MS4 stormwater permit.

Sites with land disturbance less than 1,000 square-feet will also be inspected if staff becomes aware of erosion, pollution or other potential impacts to water quality. Regardless of the size of the disturbed area, staff will work with responsible parties to ensure that threats to water quality are eliminated, as soon as is reasonably practicable. If the responsible party does not take action by the compliance timeframe deadline, staff will implement the enforcement protocol described in Section 8 to bring the site into compliance. For sites that continue to be considered low risk, the inspector may use best professional judgment to extend initial compliance timeframes if the responsible party needs additional time. Detailed information about inspection criteria are outlined in Chapter 4 the EPSC Manual. Inspectors also use the EPSC Inspector Checklist as reference, included as Appendix 1.

### 4.3.1 Initial Inspection:

The PWI will conduct the initial EPSC inspection, which is triggered by the project owner through the City's inspection scheduling system. The inspection will generally be completed and recorded the same day the inspection request is printed and assigned. This pre-construction EPSC inspection is structured to occur upon private party request and be completed and approved prior to any other building inspections on a project.

The PWI will conduct a site inspection and record the results in EnerGov as described in Section 4.4. If there is EPSC noncompliance, the PWI will notify the contractor that correction is required and provide the compliance timeline. The PWI will then schedule and conduct a follow-up inspection corresponding

with the compliance deadline. If the deficiency is not corrected by the compliance deadline the PWI will work with Watershed staff to implement the progressive enforcement protocol described in Section 8.

#### **4.3.2 Interim Inspection(s):**

Once a month, Watershed staff will search EnerGov permit records for all construction sites with an active building or grading permit. Watershed staff will conduct an interim inspection at sites with no previous interim inspection, and in some cases will re-inspect sites with a higher potential for EPSC failure.

Interim inspections are scheduled one day a month, with consideration to rainfall events, and flexibility for staffing constraints and other work obligations. Watershed staff prioritize inspections based on project history, type of construction, topography, proximity to environmentally sensitive areas (e.g., adjacent to streams or natural areas, or steeply sloped areas), prior non-compliance, and significant rainfall events. Watershed staff will track weather forecasts and will notify all inspection staff if a significant rainfall event (>2" over 24 hours) is anticipated.

Watershed staff will record all inspection results in EnerGov as described in Section 4.4. If there is EPSC noncompliance, Watershed staff will document the noncompliance in EnerGov and schedule a follow-up inspection. Watershed staff and/or PWI will complete the follow-up inspection using the same procedures detailed in Section 4.3.1. Watershed staff may expedite the response by engaging the PWI and/or the contractor onsite, by email, or by phone. Communication with the contractor by Watershed staff or the PWI will be documented in EnerGov.

To ensure that timelines for corrections have been met, Watershed staff will periodically review EnerGov records and/or conduct additional follow-up quality assurance inspections.

#### **4.3.3 Final Inspection:**

The final EPSC inspection is mandatory and triggered by the project owner through the City's inspection scheduling system. The final EPSC inspection must be approved prior to the final building inspection and issuance of the Certificate of Occupancy.

The PWI will complete the inspection using the same procedures detailed in Section 4.3.1.

Approval of a final inspection does not eliminate the requirement for the responsible party to prevent movement of sediment or pollutants off-site at all times.

### **4.4 Documentation**

Documentation of inspections throughout the duration of the project is important and required for two primary reasons:

- The City's stormwater permit from DEQ requires reporting of specific information
- Successful enforcement is contingent on clear evidence of noncompliance and a complete record of City efforts to require compliance

The PWI and Watershed staff are responsible for documenting each inspection. All inspection results and associated information should be recorded in EnerGov on the same day that the inspection is performed.

Typical documentation includes the following elements with associated dates, as applicable:

- Inspection results (approved or disapproved)
- Site observations and description of any deficiencies or noncompliance
- Record of any communication with the contractor (written or verbal)
- Compliance timeline/deadline
- A follow-up inspection scheduled and assigned as described above
- Follow-up inspection results on compliance deadline
- Record of compliance gained, or enforcement action(s)

During initial and final inspections, the PWI will record inspection results in EnerGov and if needed, communicate any deficiencies to the builder while onsite or by phone.

## **5 Capital Improvement Projects (CIP's) and Private Development with Public Improvement or Water Quality Facility Construction**

The information in this section applies to all CIP's and all private development with a privately-financed public improvement component or with required water quality facility construction.

### **5.1 Permits**

All procedures and requirements in Section 4.1 apply.

It is the responsibility of the City's project managers to ensure that the project owner (City or private) has secured the necessary building, grading, and 1200-C permits.

### **5.2 EPSC Plan Review**

It is the responsibility of the City's project managers to ensure that the project owner (City or private) has an EPSC plan and Standard Notes included as part of the project's plan set. The erosion control features may be included on an existing sheet or as a separate EPSC sheet if warranted by the size and complexity of the project. Project managers will use the City's EPSC Manual for guidance and consult Watershed staff, as needed.

The PWI assigned to the project will review the approved EPSC plans and attend the pre-construction meeting to discuss key elements of the approved erosion control plan, other environmental concerns, and the construction schedule.

#### **5.2.1 Construction where a 1200-C permit is not required**

The City's project manager will provide a copy of the plans to Watershed staff for review of EPSC compliance. Watershed staff will review plans and submit comments, generally within seven business days, to the project manager. The project manager will forward all comments to the responsible party for correction. Corrected and approved plans must be completed prior to issuance of the Notice to Proceed.

#### **5.2.2 Construction requiring a 1200-C permit**

All procedures and requirements described in Section 4.2.2 apply.

If a DEQ 1200-C permit is required for a CIP, the City’s project manager is responsible for meeting DEQ requirements and obtaining a permit.

### 5.3 Inspections

The PWI will conduct the initial and interim EPSC inspections, and Watershed staff will conduct the final EPSC inspection. The minimum occurrence of interim inspections is shown in the matrix below.

Interim Inspection Minimum Occurrence		
	Active <sup>1</sup>	Inactive <sup>2</sup>
Dry Weather Period <sup>3</sup>	1/Week	1/Month
Wet Weather Period <sup>4</sup>	2/Week	2/Month

<sup>1</sup>Active sites are those with construction activity

<sup>2</sup>Inactive sites are those without construction activity for greater than seven consecutive days

<sup>3</sup>Dry weather period from June 1<sup>st</sup> – September 30<sup>th</sup> of each year

<sup>4</sup>Wet weather period is from October 1<sup>st</sup> – May 31<sup>st</sup> of each year

The PWI may conduct more frequent inspections at active construction sites with a higher potential for EPSC failure or potential impact to environmentally sensitive areas (e.g., adjacent to streams or natural areas, or steeply sloped areas), especially after significant rainfall events.

During inspections, the PWI may reference the site-specific ESCP, the EPSC manual, and the City’s minimum BMP requirements to assess the status of erosion control measures at the site. If an EPSC deficiency is identified and not corrected in a timely manner staff will implement the enforcement protocol described in Section 8.

If a DEQ 1200-C permit is required, the permittee (City or private) is responsible for meeting all DEQ permit requirements including inspection frequency, recordkeeping, and reporting.

### 5.4 Documentation

The PWI is responsible for documenting their inspection frequency, observations, communications, and actions. All inspection results and information will be kept in the PWI daily inspection reports and project files. Typical documentation elements are listed in Section 4.4.

#### 5.4.1 Additional Requirements for City held 1200-C permits

The City’s project manager, or assigned agent, is responsible for coordinating ESCP plan revisions, inspections, documentation, and recordkeeping required by the 1200-C permit. The City’s project manager, or assigned agent, will work with the contractor and PWI to keep the ESCP plan current and inform DEQ of any field changes that occur.

## 6 Permit termination Requirements for sites with a 1200-C permit

Prior to terminating a 1200-C permit, DEQ requires the permitted site to be stabilized to minimize the erosion potential.



The permit holder (City or private) is responsible for fulfilling permit requirements, and for requesting permit termination from DEQ upon conclusion of the permitted work.

### 6.1 Private 1200-C permits

DEQ may request City inspection of 1200-C sites when they receive a request for permit termination. Upon request, the PWI will conduct an inspection and report site conditions to DEQ and Watershed staff. If the project is open in EnerGov, the PWI will document the inspection as described in Section 4.4.

## 7 Citizen Concerns & Code Compliance Referrals

PWIs or Watershed staff will respond to citizen concerns and code compliance referrals for EPSC deficiencies that are a violation of stormwater code but are not associated with an active building permit. Response time will be within 24 hours whenever possible for deficiencies classified as low risk, and sooner when deficiency is classified as an imminent risk.

PWI or Watershed staff will determine who the responsible contractor or homeowner is and communicate with them directly if they are on site at the time of initial inspection. If no one is present during the initial inspection, then information regarding the violation will be left at the site where EPSC deficiency is occurring. Also, Watershed staff will locate additional contact information (phone number and/or email address) of contractors or homeowners and contact them to verify that they have received the information regarding EPSC deficiency and to discuss the timeline to correct deficiency. Follow-up inspections will be conducted to confirm that the deficiency has been corrected. EPSC deficiencies not corrected in a timely manner will result in the enforcement protocol described in Section 8.

## 8 Enforcement Protocol

The enforcement protocol is the same for all EPSC noncompliance whether related to SFRC, commercial construction, other development, or code violations.

### 8.1 Enforcement Authority

The Gresham Revised Code details legal authority and responsibility regarding enforcement procedures.

GRC 3.23.025 – Waste Disposal Prohibitions (including construction debris and sediment)

GRC 3.99.040 – Fines, Penalties and Other Enforcement Tools

GRC 7.50.100 – Stop Work Order (including imminent threat situations)

GRC 7.50.200 – Abatement

### 8.2 Enforcement

Enforcement levels are listed below. The City strives to address EPSC deficiencies with the lowest level response needed to gain compliance. However, it may be necessary to begin enforcement at a higher level if the non-compliance is causing or has the potential to cause immediate degradation.

#### Level 1: Notice to Correct (NTC)

If the site has an EPSC deficiency, the PWI will communicate deficiencies to the contractor or builder while onsite or by phone or email. The written or verbal **NTC** will detail the required corrective action and time

frame for compliance. Details will be documented by recording an inspection in EnerGov or in the PWI's daily inspection reports.

PWI or Watershed staff will conduct a follow-up inspection and document that deficiencies have been corrected or determine if NOV is required.

### **Level 2: Notice of Violation (NOV)**

A Notice of Violation **NOV** may be issued for EPSC noncompliance if previous enforcement actions have not achieved compliance. The written **NOV** will detail the required corrective action, time frame for compliance, and potential consequences if compliance is not achieved. Details will be documented by recording an inspection in EnerGov or in the PWI's daily inspection reports.

PWI or Watershed staff will conduct a follow-up inspection and document that deficiencies have been corrected or determine if a Stop Work Order is required.

### **Level 3: Stop Work Order**

A stop work order may be issued for EPSC noncompliance if previous enforcement actions have not achieved compliance or there is an imminent risk to the watershed.

PWI or Watershed staff will alert the Development Engineering Specialist or Building Official, the Public Works Inspection manager and the Watershed manager of the intent to issue a stop work order. When the offense is related to construction on private property, the Watershed manager will coordinate with the Building Official to ensure that the City has a unified position on the scope of the stop work order. Watershed staff will lead the stop work enforcement process with assistance from the PWI.

If a stop work order is unlikely to be effective because work has stopped at the site for other reasons, or a legal determination has been made that the stop work order does not affect the remaining activities at the site, a civil penalty may be issued.

### **Level 4: Civil Penalty**

A civil penalty may be issued for EPSC noncompliance if previous enforcement actions have not achieved compliance or there is an imminent risk to the watershed, or a violation has caused degradation in the watershed. It may replace or augment a stop work order.

PWI or Watershed staff will alert the Development Engineering Specialist or Building Official, the Public Works Inspection manager, and the Watershed manager of the intent to issue a civil penalty. Watershed staff will lead the civil penalty enforcement process with assistance from the PWI. An example Notice of Civil Penalty is included as Appendix 4.

### **Level 5: Abatement**

Abatement may occur if previous enforcement actions have not achieved compliance. Per GRC 7.50, violation of code that is a nuisance and an imminent threat and/or safety may be summarily abated without notice.

**Appendix 1: EPSC Inspector Checklist**

## EPSC Inspector Checklist

- No construction debris, sediment, or sediment-laden water is permitted to leave the construction site.
- Inspect the perimeter of the site, including all discharge locations to stormdrains, UIC's and receiving waters.
- Inspect nearby sensitive areas: streams, wetlands, ponds, drainage channels, lakes, and protected trees.
- Ensure required BMP's are properly installed before construction begins.
- Ensure that no ground disturbance occurs outside of the clearing limits.
- Ensure that stormdrain inlet protection, sediment barriers and check dams are maintained. Clean if sediment reaches one-third the exposed height of the control or storage depth.
- Ensure that gravel construction site entrances and exits are installed and maintained. Top dress with additional stone as conditions demand.
- Ensure that any tracked sediment is swept or vacuumed daily. Street washing is prohibited.
- Ensure soil stockpiles are located away from inlets and water bodies. Cover during the wet weather season.
- Inspect all non-stormwater pollutant controls, including storage and removal procedures for sanitary waste and construction materials. Ensure proper containment and maintenance.
- Ensure entire site, including finished slopes, are fully stabilized prior to final EPSC inspection approval.
- Require additional BMP's, if necessary to protect adjacent property or downstream water quality.
- Ensure site consistency with the site-specific ECSP or the standard SFRC EPSC plan, as applicable.

**Appendix 2: Standard SFRC EPSC Plan**

## Single-family/Duplex Residential EPSC Plan – City of Gresham

The following commitments constitute my Erosion Prevention and Sediment Control (EPSC) Plan as required under the City's EPSC Manual. In developing this plan, I certify that I have evaluated site contours and drainage patterns, identified potential erosion and sediment problems, evaluated EPSC measures, and will implement EPSC measures prior to performing any earthwork or site grading. I will follow this plan and make ongoing revisions as needed to ensure sediment stays onsite and other construction-related pollutants and debris are kept out of stormwater and other waters.

I further certify that all EPSC measures will be installed in accordance with City requirements including the City's *Public Works Standards and EPSC Manual*. I understand that the City will inspect my site for implementation of this EPSC Plan before and during construction, and that a stop-work order may be issued if I fail to properly implement EPSC measures.

1. I understand I am responsible, as the permit holder, to keep sediment onsite.
2. I will provide a linear barrier (such as a sediment fence) and perimeter control where needed to keep sediment onsite.
3. I will ensure that construction debris, paint, concrete, and other pollutants are kept out of stormwater, streams, storm drains, and any stormwater treatment systems such as street raingardens.
4. I will provide storm drain inlet protection.
5. I will provide construction entrance/exit tracking controls.
6. I will provide concrete management.
7. I will provide slope breaks for steep slopes.
8. I will provide stockpile management for both soil stockpiles and non-soil stockpiles.
9. I will provide temporary ground cover (such as straw mulch) during October 1 – May 31, or until wet weather subsides, and permanent seeding and planting.
10. I will provide daily inspection and maintenance when work is ongoing, as needed during wet weather, and even if work is not ongoing to ensure this plan is met.
11. I will remove temporary erosion controls once construction is completed and the site is stabilized.
12. I understand the City may require modifications or additional EPSC measures to be installed onsite.

**Name:**

**Phone Number:**

\_\_\_\_\_

**Full Construction Property Address:** \_\_\_\_\_

**Person Responsible for Implementing and Inspecting EPSC Measures:**

## **Appendix 3: Pollution Prevention Notice**

# Erosion Control and Pollution Prevention Notice

*Sediment must be kept onsite at all times during grading and construction*

- Best Management Practices including perimeter control, storm drain inlet protection, construction entrance/exit controls and pollution prevention measures must be in place *before* any grading occurs

- *Wet weather measures*, including ground cover, slope stabilization, and stockpile protection, must be in place Oct. 1<sup>st</sup> – May 31<sup>st</sup>

- The City may perform unscheduled inspections at any time

- Inspections can be scheduled by calling:

**The Permit Center: 503-618-2845**

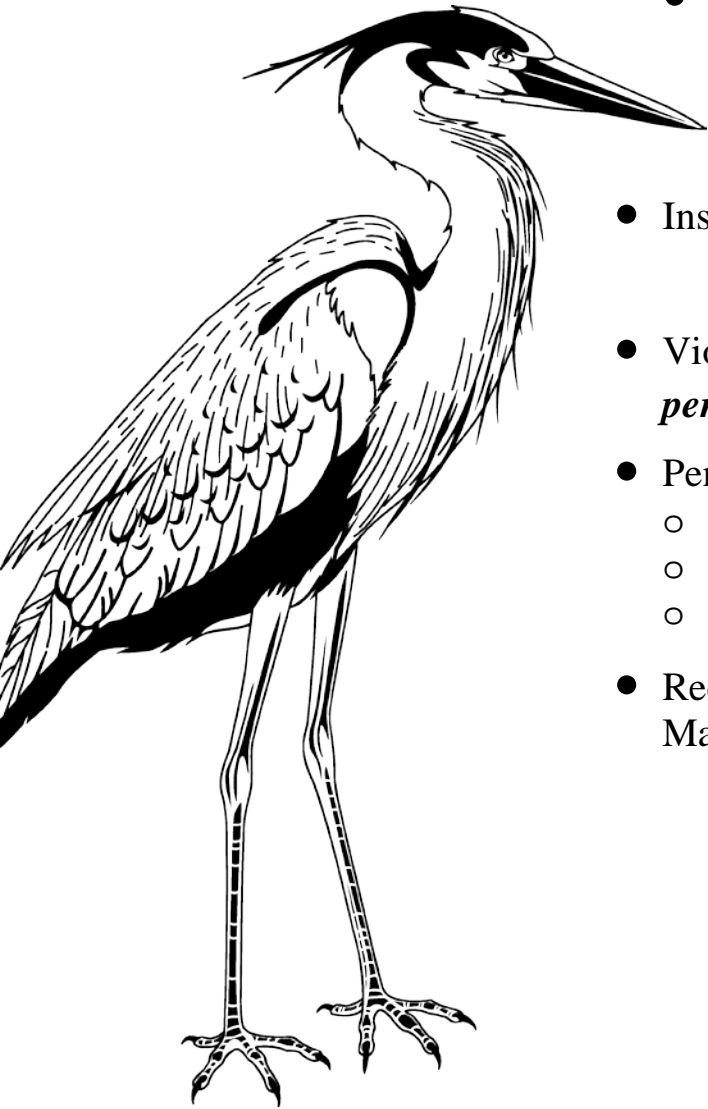
- Violations of erosion control and pollution prevention requirements may be subject to *penalty* whether or not a building permit has been issued

- Penalties for violations may include one or more:

- *Stop Work Order*
- *Fines up to \$1,000 per violation per day*
- *Abatement (costs charged to property owner)*

- Requirements are detailed online in the City's EPSC Manual

[www.greshamoregon.gov](http://www.greshamoregon.gov)





## **Appendix 4: Notice of Civil Penalty**



**City of Gresham**  
**Community Development**

Code Compliance Division

1333 N.W. Eastman Parkway  
Gresham, OR 97030  
(503) 618-2463

CASE #:

**Civil Penalty #1**

The undersigned City of Gresham authority certifies and says that the following violations were caused by the below mentioned person(s):

**Responsible Party**

**Location of violation:**

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**Violation of Gresham Revised Code (GRC) / Gresham Community Development Code (GCDC)\***

**Penalty Amount**

**Imposed**

**GRC 3.23.025 Waste Disposal Prohibitions**

(1) No person shall throw, deposit, leave, maintain, keep, or permit to be thrown deposited, left, or maintained, in or upon any public or private property, driveway, parking area, street, alley, sidewalk, catch basin, inlet, or other component of the public stormwater system, materials that may cause or contribute to pollution, including but not limited to any refuse, rubbish, garbage, litter, yard debris, landscape materials, compost, topsoil, bark, gravel, sand, dirt, sod, sediment or sediment-laden runoff from construction or landscaping activities, hazardous materials, or other discarded or abandoned objects, articles, and accumulations.

NOTES:

**TOTAL PENALTY AMOUNT IMPOSED: \$XXX.XX**

**A civil penalty may be issued each day violations continue to occur.**

I hereby certify that I have reasonable grounds to believe that the above named person caused, or permitted to be caused, the above violation. I further certify that I have perfected service upon the above named person by  Personal Service or  Regular Mail

Certified Mail