SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

JAMES H. DAVIS, Ph.D.
Director
Resource Protection Division

Certified Mail - Return Receipt Requested

October 11, 2012

Mr. Kurt Browning, Director of Development/Construction
Titan Development
6300 Riverside Plaza Lane NW, Suite 200
Albuquerque, NM 87120

Re: Construction Stormwater, SIC 1522, NPDES Compliance Evaluation Inspection, Broadstone Santa Monica Alliance LLC, Santa Monica Apartments, NPDES Permit NMR12AD01, October 4, 2012

Dear Mr. Browning,

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at a construction site for which you may be an "operator" (see Appendix A in permit). The NMED conducted this inspection on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are noted in the checklist section of the inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both USEPA (Diana McDonald, USEPA (6EN-WT), 1445 Ross Ave., Dallas, Texas, 75202), NMED (at above address) regarding modifications and compliance schedules.

I want to thank you for the assistance of Mr. Todd Landvatter during this inspection. If you have any questions, please feel free to contact me at sarah.holcomb@state.nm.us or by telephone at (505) 222-9587.

Sincerely,
/s/ Sarah Holcomb
Sarah Holcomb
Surface Water Quality Bureau

Cc: Rashida Bowlin, USEPA (6EN-AS) by email
Carol Peters-Wagnon (6EN-AS) by email
Diana McDonald, USEPA (6EN-AS) by email
Darlene Whitten-Hill, USEPA (6EN-AS) by email
Hannah Branning, USEPA (6EN-AS) by email
Bill Chavez, NMED District 1 Acting Manager, by email

Kathy Verhage, City of Albuquerque DMD, by email

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3	N M R 1 2 A D 0 1 11 12	1 2 1 0 0 4 17 18	} 19	S 20	2

Remarks

C O N S T R U C T I O N > 5 A C R E S

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 4	71 N 72	N 73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
SANTA MONICA APARTMENTS, ALBUQUERQUE, NM; BERNALILLO COUNTY;
FROM I-25, TAKE PASEO DEL NORTE EAST, TURN SOUTH ON SAN PEDRO. SITE IS ON EAST SIDE, BEFORE YOU GET TO SAN ANTONIO.

Entry Time /Date
1100 HOURS / 10-4-2012

Permit Effective Date
2-16-2012

Exit Time/Date
1400 HOURS / 10-4-2012

Permit Expiration Date
2-15-2017

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
MR. TODD LANDVATTER, PROJ. SUPERINTENDENT, ALLIANCE RESIDENTIAL BUILDERS (602) 778-2800
MS. RENE HARTMAN, INSPECTIONS PLUS (505) 344-9410
MS. SHARON VAUGHAN, INSPECTIONS PLUS (505) 344-9410

Other Facility Data

N. 35.1627°
W. -106.5688°

SIC: 1522

Name, Address of Responsible Official/Title/Phone and Fax Number
MR. KURT BROWNING, DIRECTOR OF DEVELOPMENT/CONSTRUCTION, TITAN DEVELOPMENT/BROADSTONE SANTA MONICA ALLIANCE LLC (505) 998-0163
6300 RIVERSIDE PLAZA LANE NW, SUITE 200, ALBUQUERQUE, NM 87120

Contacted
Yes [ ] No [*]

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	S	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. **INSPECTOR ARRIVED AT THE SITE AT 1100 HOURS ON OCTOBER 4, 2012 AND CONDUCTED AN ENTRANCE INTERVIEW WITH MR. TODD LANDVATTER, PROJECT SUPERINTENDENT, WHERE SHE MADE INTRODUCTIONS, PRESENTED CREDENTIALS AND EXPLAINED THE PURPOSE OF THE INSPECTION. AN EXIT INTERVIEW WAS HELD AT THE SITE FROM APPROXIMATELY 1345-1400 HOURS WITH MR. LANDVATTER, MS. RENE HARTMAN AND MS. SHARON VAUGHN OF INSPECTIONS PLUS, INC.**
2. **PLEASE SEE REPORT FOR FURTHER DETAILS.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sarah Holcomb */s/ Sarah Holcomb*	505-222-9587	10-11-2012
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Richard Powell */s/ Richard Powell*	505-827-2798	10-11-2012

Industrial Storm Water Worksheet (Construction) – State of New Mexico

National Database Information		General	
Inspection Type	CEI	Inspector Name	Sarah Holcomb
NPDES ID Number	NMR12A915 (ARC) NMR12A034 (DRI) NMR12AD01 (BSM)	Telephone	505-222-9587
Inspection Date	10-4-2012	Entry Time	1100 hours
Inspector Type (circle one)	EPA [State] EPA Oversight	Exit Time	1400 hours
Facility Type (circle one)	Commercial / [Residential] / Municipal / Industrial	Signature	*/s/ Sarah Holcomb*

Facility Location Information				
Name/Location/Mailing Address	Broadstone Santa Monica Apartments, near San Pedro and San Antonio, ABQ, NM Mailing (Alliance): 6300 Riverside Plaza Lane NW, Suite 200, Albuquerque, NM 87120			
Coordinates	Latitude	N. 35.1627°	Longitude	W. -106.5688°
Receiving Waters	ABQ MS4 thence to the Rio Grande in segment 20.6.4.106 NMAC			
Disturbed Area	59 acres	Start/Stop Dates	11-10-2013	

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Alliance Residential Company (ARC) Del Rey Investments, LLC (DRI) Broadstone Santa Monica LLC (BSM)	
Facility Contact	Mr. Todd Landvatter, Proj. Superintendent	602-778-2800
Authorized Official(s)	Mr. Keith Coleman (ARC) Mr. Kurt Browning (DRI & BSM)	602-778-2800 505-998-0163

Site Information: *circle all that apply*							
Nature of Project	[Residential]	Commercial / Industrial	Roadway	Private	Federal	State / Municipal	Other
Construction Stage	Clearing / Grubbing	[Rough Grading]	[Infrastructure]	[Building (Vertical)]	[Final Grading]	[Final Stabilization]	

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	[Y]	N	SWPPP Prepared & Available? *Part 7.1.1, 7.2.1*	[Y]	N
Permit Type	[General]	Individual	SWPPP Contents Satisfactory?	Y	[N]
Notice Posted (visible, font large, NPDES Permit tracking#, contact name & phone #) *Part 1.5*	[Y]	N	SWPPP Implementation Satisfactory?	[Y]	N
NOI Date	3-12-2012		SWPPP Date	2-21-2012	
Is NOI Satisfactory?	[Y]	N			

Additional Facility and Inspection Information *(optional)*
This project involves the redevelopment of an old mobile home park. The Broadstone Santa Monica apartment project will ultimately redevelop this 59 acre parcel into higher end apartments. Currently, approximately 30 acres are under construction.

SWPPP Review *(can be completed in office)*			
General			**Notes:**
SWPPP Signed/Certified. Did all operators sign/certify the SWPPP? *Part 7.2.15, Appendix I.11*	Y	N	
SWPPP completed prior to NOI? *Part 7.1.1, Part 1.2.1*	Y	N	
Endangered Species Act. Does SWPPP include documentation supporting determination? *Part 7.2.14.1; Part 1.1.e, Appendix D*	Y	N	
Historic Properties. Does SWPPP include documentation supporting determination? *Part 7.2.14.2, Appendix E*	Y	N	
If applicable, documents contact with agency or office responsible for implementing Safe Drinking Water Act underground injection control well(s)? *Part 7.2.14.3, 40 CFR Parts 144 -147*	Y	N	N/A
Post-Authorization Additions. Does SWPPP include: ➢ Copy of acknowledgement letter Y/N ➢ Copy of NOI Y/N ➢ Copy of permit Y/ N *Part 7.2.16.3*	Y	N	
If applicable, SWPPP describes compliance with any case-by-case basis USEPA imposed water quality-based effluent limitation requirements? *Part 3*	Y	N	N/A
If discharge to an impaired water, includes records of all data used to complete NOI: ➢ List of all impaired waters Y/N ➢ Pollutant(s) for which the surface water is impaired Y/N ➢ Whether a TMDL has been approved or established Y/N *Part 3.2.1, Appendix I.15*	Y	N	
Required SWPPP modifications completed? ➢ Completed w/7 days Y/N ➢ Maintains modification records showing dates, name of person authorizing change and summary Y/N ➢ Signed/Certified Y/N ➢ Immediately notified other operators Y/N *Parts 7.4, 5.2.2, Appendix I.11.b*	Y	N	None noted as required at the time of this inspection.
Records Retention. Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires or is terminated? *Parts 4.1.7, 5.4.4, Appendix I.10.2, I.15*	Y	N	

Team & Activity Description			Notes:
Identifies stormwater team personnel and responsibilities? ➢ Personnel (by name or position) Y/N ➢ Individual responsibilities Y/N *Part 7.2.1*	Y	N	
Is staff training documented? ➢ Training occurs prior to the commencement of earth-disturbing activities or pollutant-generating activities, whichever occurs first Y/N ➢ Ensures following understand the requirements of this permit and their specific responsibilities: o Personnel responsible for the design, installation, maintenance, and/or repair of controls/measures Y/N o Personnel responsible for the application and storage of treatment chemicals Y/N o Personnel responsible for conducting inspections Y/N o Personnel responsible for taking corrective actions Y/N ➢ At a minimum, training includes: o Location of all stormwater controls on the site required by this permit, and how maintained Y/N o Proper procedures to follow with respect to the permit's pollution prevention requirements Y/N o When and how to conduct inspections, record applicable findings, and take corrective actions Y/N *Parts 7.2.13, 6 and permit notes for emergency-related construction activities*	Y	N	Onsite representative indicated that he had not obtained SWPPP-related training and had not been training his staff. Training assistance can be provided by the third party consultant, as they indicated during the inspection.
Describes nature of construction activities? ➢ Size of the property Y/N ➢ Total area to be disturbed Y/N ➢ Construction support activity areas Y/N ➢ Maximum area to be disturbed at any one time Y/N *Part 7.2.2*	Y	N	
If applicable, documents emergency-related projects? ➢ Cause of public emergency (e.g., natural disaster, extreme flooding conditions, etc.) Y/N ➢ Info substantiating occurrence (e.g., state disaster declaration or similar state or local declaration) Y/N ➢ Description of the construction necessary to reestablish effected public services Y/N *Parts 7.2.3, 1.2*	Y	N	N/A
Identifies (lists) other site operators and areas of site over which each has control? ➢ List and areas of site over which each has	Y	N	

control Y/N *Part 7.2.4*			
Describes sequence, estimated dates (departures) and duration of construction activities? ➢ Installation of control measures when operational Y/N ➢ Commencement/duration clearing & grubbing, mass grading, site preparation (excavating, cutting & filling), final grading, and creation of soil & vegetation stockpiles Y/N ➢ Cessation, temporarily or permanently, of construction activities on the site, or in designated portions of site Y/N/NA ➢ Final/temporary stabilization areas of exposed soil Y/N ➢ Removal of temporary stormwater conveyances/channels and other stormwater control measures Y/N ➢ Removal of construction equipment and vehicles Y/N *Part 7.2.5*	Y	N	
Site Map			**Notes:**
Includes legible site map(s)? *Part 7.2.6*	Y	N	
➢ Boundaries of the property Y/N ➢ Locations construction activities will occur Y/N ➢ Locations earth-disturbing activities will occur (note any phasing) Y/N ➢ Approximate slopes before and after major grading (note steep slopes) Y/N ➢ Locations sediment, soil, or materials will be stockpiled Y/N ➢ Locations of crossings of surface waters Y/N/NA ➢ Designated points vehicles exit onto paved roads Y/N ➢ Locations of structures/impervious surfaces upon completion Y/N ➢ Locations of construction support activity areas Y/N *Part 7.2.6.1*	Y	N	
➢ Locations of surface waters/wetlands, within or in immediate vicinity Y/N/NA ➢ Indicates waters listed as impaired, and Tier 2~~, Tier 2.5,~~ or Tier 3 Y/N *Part 7.2.6.2*	Y	N	Site map did not list impairments in the Rio Grande.
➢ Boundary lines of natural buffers *Parts 7.2.6.3, 2.1.2.1a*	Y	N	N/A
➢ Areas of federally-listed critical habitat for endangered or threatened species *Part 7.2.6.4*	Y	N	
➢ Topography Y/N/NA	Y	N	

➢ Existing vegetative cover Y/N ➢ Drainage pattern of stormwater/authorized non-stormwater flow onto, over, and from site before and after major grading Y/N *Part 7.2.6.5*			
➢ Stormwater and allowable non-stormwater discharge locations Y/N ➢ Locations of storm drain inlets on site and immediate vicinity Y/N ➢ Locations stormwater or allowable non-stormwater will be discharged to surface waters (including wetlands) on or near site Y/N/NA *Part 7.2.6.6*	Y	N	The overflow weir from the pond area at the east side of the site was not indicated as an outfall.
➢ Locations of potential pollutant-generating activities *Part 7.2.6.7, Part 7.2.7*	Y	N	
➢ Locations of control measures *Part 7.2.6.8*	Y	N	
➢ Locations polymers, flocculants, or treatment chemicals will be used/stored *Part 7.2.6.9*	Y	N	N/A
Construction Site Pollutants			**Notes:**
Includes pollutant-generating activities list and description? *Part 7.2.7.1*	Y	N	Portolet, solvents, preservatives, roofing tar, joint compound, waste concrete/wash water, stucco/brick/block, debris & trash, Freon, asphalt, oil & grease, fuels, fertilizers, TSS, dust.
Includes inventory of pollutants or constituents? ➢ Inventory Y/N ➢ Potential spills/leaks Y/N ➢ Departures from manufacturer's specifications for applying fertilizers containing nitrogen & phosphorus Y/N/NA *Parts 7.2.7.2, 2.3.5.1*	Y	N	
Identifies all sources of allowable non-stormwater discharges? *Parts 7.2.8, 1.3.d*	Y	N	Fire fighting, hydrant flushing, vehicle wash, dust control, water line flushings, bldg wash down, pavement wash, a/c condensate, landscape irrigation.
If required (surface water wi/50 feet of earth disturbance), documents and describes buffer compliance alternative selected? ➢ Ensures that all discharges from the area of earth disturbance to the natural buffer are first treated by the site's erosion and sediment controls Y/N/NA ➢ Uses velocity dissipation devices, if necessary Y/N/NA ➢ Documents natural buffer width Y/N/NA ➢ Delineates, and clearly marks off, with flags, tape, or other similar marking device all natural buffer areas Y/N/NA ➢ Documents erosion and sediment control(s) used to achieve an equivalent sediment reduction Y/N/NA ➢ Documents any information relied upon to demonstrate equivalency Y/N/NA *Parts 7.2.9, 2.1.2, Appendix G*	Y	N	N/A

As applicable, describes and documents <u>buffer exceptions</u>? ➢ Describes rationale/why infeasible to provide and maintain an undisturbed natural buffer of any size Y/N/NA ➢ For linear project, describes buffer width retained and supplemental controls installed Y/N/NA ➢ Small residential lot options Y/N/NA ➢ Documents CWA Section 404 Permit, water-dependent structure/access disturbances Y/N *Parts 7.2.9; 2.1.2.1e, Appendix G*	Y	N	N/A
All Stormwater Control Measures			**Notes:**
Describes each measure? ➢ Type of measure to be installed and maintained, including design information Y/N ➢ Specific sediment controls installed and made operational prior to conducting earth-disturbing activities Y/N ➢ For exit points, stabilization techniques and any additional controls planned to remove sediment prior to vehicle exit Y/N ➢ For linear projects (if applicable), where/why it has been determined that the use of perimeter controls is practicable Y/N/NA *Part 7.2.10.1*	Y	N	No specific documentation in plan to indicate which controls were set up prior to earth disturbance.
Erosion and Sediment Controls			**Notes:**
Minimizes <u>area of disturbance</u>? *Part 2.1.1.1*	Y	N	Project is phased.
Describes erosion and sediment control <u>design requirements</u>? ➢ Accounts for expected amount, frequency, intensity, duration of precipitation Y/N ➢ Accounts for nature of run-on and run-off (channelized peak flow rates & total volume at outlet) Y/N ➢ Accounts for range of soil particle sizes (distribution, erosivity and cohesiveness) Y/N ➢ Directs discharge to vegetated areas to increase sediment removal and infiltration unless infeasible Y/N/NA ➢ Uses velocity dissipation, if necessary Y/N/NA ➢ Complies with State of New Mexico except Indian country requirements: o Includes site-specific BMPs/controls designed to prevent to the maximum extent practicable an increase in sediment yield/flow velocity from pre-construction, pre-development conditions both during and after construction Y/N o Selection based on appropriate soil loss prediction models (results in sediment yields/flow velocities, that to the maximum extent practicable, will not be greater than the sediment yield levels	Y	N	

and flow velocities from pre-construction, pre-development conditions) Y/N *Parts 2.1.1.2, 9.4.1.1*			
Describes erosion and sediment control <u>installation</u> requirements? ➢ Completes installation of downgradient stormwater/sediment controls by the time or immediately following earth-disturbance begins unless infeasible Y/N/NA ➢ Installs all other controls and makes operational as soon as conditions allow Y/N ➢ Uses good engineering practices and follows manufacturer's specifications or explain departures Y/N *Part 2.1.1.3*	Y	N	
Describes erosion and sediment control <u>maintenance</u> requirements? ➢ Initiates fix immediately and completed by close of next work day (routine maintenance) Y/N ➢ Installs new measure/significant repair no later than 7 calendar days or document why infeasible Y/N *Part 2.1.1.4*	Y	N	
Installs <u>perimeter controls</u> and describes maintenance (removes sediment before it has accumulated to 1/2 of the above-ground height)? *Part 2.1.2.2*	Y	N	
Minimizes <u>sediment track-out</u>? ➢ Restricts vehicle use to properly designated exit points? Y/N ➢ Uses appropriate stabilization techniques at all points that exit onto paved roads? Y/N ➢ Where necessary, uses additional measures to remove sediment prior to exit? Y/N/NA ➢ Removes tracked out sediment prior to the end of the same work day or if occurs on non-work day the next work day? Y/N *Part 2.1.2.3*	Y	N	
Controls discharges from <u>stockpiled sediment or soil</u>? ➢ Locates piles outside of buffers Y/N ➢ Locates piles separate from stormwater controls Y/N ➢ Uses temporary sediment barrier Y/N/NA ➢ Where practicable, provides cover or temporary stabilization Y/N ➢ Does not hose down or sweep into stormwater conveyance unless connected to basin, trap, etc. Y/N ➢ Contains and securely protects pile from wind? Y/N *Part 2.1.2.4*	Y	N	
Minimizes <u>dust</u>?	Y	N	Water applied 3-4 times per day.

Part 2.1.2.5			
Minimizes disturbance of steep slopes? *Part 2.1.2.6*	Y	N	N/A
Preserves topsoil, unless infeasible? *Part 2.1.2.7*	Y	N	N/A

Minimizes soil compaction where final vegetative stabilization or infiltration installed? *Part 2.1.2.8*	Y	N	
Protects storm drain inlets and describes maintenance requirements (removes sediment by the end of the same work day or end of the following work day)? *Part 2.1.2.9*	Y	N	
Describes constructed conveyance channel controls (if installed)? *Part 2.1.3.1*	Y	N	N/A
Describes sediment basin design (if installed) and maintenance (maintain at least ½ of capacity at all times)? *Part 2.1.3.2*	Y	N	Sediment basin was newly installed and SWPPP had not been updated as of this inspection.
Describes treatment chemical controls (if used)? *Part 2.1.3.3*	Y	N	N/A
Includes documentation for use of treatment chemicals (polymers, flocculants, or other treatment chemicals)? ➢ Lists all soil types expected to be exposed and locations where chemicals will be applied. Also include a list of soil types expected to be found in fill material to be used in same areas Y/N ➢ Lists all treatment chemicals and why the selection of these chemicals is suited to the soil characteristics Y/N ➢ If authorized by EPA to use cationic treatment chemicals, includes the specific controls and implementation procedures designed to ensure use of cationic treatment chemicals will not lead to a violation of water quality standards Y/N/NA ➢ Dosage/methodology to determine dosage Y/N ➢ Information from any applicable MSDS Y/N ➢ Schematic drawings of any chemically-enhanced or chemical treatment systems Y/N/NA ➢ Description of how chemicals will be stored Y/N ➢ References to applicable state or local requirements and copies of applicable manufacturer's specifications Y/N ➢ Description of training that personnel have received or will receive Y/N *Parts 7.2.10.2, 2.1.3.3h*	Y	N	N/A
Describes dewatering controls (if installed)? *Part 2.1.3.4*	Y	N	N/A

Stabilization Requirements			Notes:
Describes compliance with deadlines for vegetative and/or non-vegetative stabilization practices, including exceptions? Deadline to Initiate ➢ Initiates stabilization immediately (no later than end of next work day following earth-disturbing activities permanently/temporarily ceased) Y/N Deadline to Complete ➢ As soon as practicable, but no later 14 calendar days after initiation, completes stabilization (for vegetative, all activities to initially seed or plant, and/or for non-vegetative, installation or application) Y/N ➢ In arid, semi-arid or drought-stricken areas for permanent stabilization, immediately initiates, and within 14 calendar days completes non-vegetative stabilization measures to prevent erosion; and as soon as practicable completes all activities necessary to initially seed or plant; and documents beginning/ending dates of the seasonally dry period, site conditions, and schedule Y/N/NA ➢ Documents/describes circumstances beyond control that prevent meeting deadlines Y/N/NA ➢ If discharging to sediment or nutrient-impaired waters or Tier 2~~, 2.5~~ or 3 waters, completes stabilization (vegetative or non-vegetative) wi/7 calendar days after temporary or permanent cessation Y/N/NA *Parts 7.2.10.3, 2.2.1, 3, 9.4.1.3*	Y	N	
Describes compliance with vegetative (final) stabilization criteria? ➢ Provides uniform vegetation (e.g., evenly distributed, without large bare areas) perennial vegetative cover with a density of 70% of the native background vegetative cover for all unpaved areas / areas not covered by permanent structures Y/N ➢ Immediately after seeding or planting the area to be vegetatively stabilized, to the extent necessary to prevent erosion on the seeded or planted area, select, design, and install non-vegetative erosion controls that provide cover while vegetation is becoming established Y/N *Parts 7.2.10.3, 2.2.2.a, 3, 9.4.1.4*	Y	N	

If applicable, describes compliance with State of New Mexico, except Indian country, arid, semi-arid areas, or drought stricken option for final stabilization: ➢ Area seeded/planted must wi/3 yrs provides established vegetation that achieves 70% of the native background vegetative cover Y/N ➢ Selects, designs, and installs non-vegetative erosion controls that provide cover for at least 3 years without active maintenance Y/N ➢ Complies with notification, inspection maintenance, and reporting) Y/N *Parts 7.2.10.3, 2.2.2.b, 3, 9.4.1.5*	Y	N	
If using, provides effective non-vegetative cover to stabilize? *Parts 7.2.10.3, 2.2.2.2*	Y	N	N/A
Pollution Prevention Procedures			**Notes:**
Describes procedures for <u>spill prevention and response</u>? *Parts 7.2.11.1, 2.3.4*	Y	N	
Describes procedures for <u>waste management</u>? *Part 7.2.11.2, 2.3.3.3*	Y	N	
Eliminates prohibited discharges? ➢ Concrete washout, unless managed by control in Part 2.3.3.4 Y/N ➢ Washout/cleanout of stucco, paint, form release oils, curing compounds and other materials unless managed by control in Part 2.3.3.4 Y/N ➢ Fuels, oils or other from vehicle and equipment O&M Y/N ➢ Soaps, solvents, or detergents used in vehicle and equipment washing Y/N/NA ➢ Toxic or hazardous substances from spill/release Y/N *Part 2.3.1*	Y	N	
Properly maintains and protects all pollution prevention controls? *Part 2.3.2*	Y	N	Concrete washout was full on the day of this inspection but contractor had been called to pick it up and replace with another unit.
Complies with pollution prevention standards for certain activities? ➢ Fueling/maintenance of equipment or vehicles Y/N/NA ➢ Washing of equipment and vehicles Y/N/NA ➢ Storage, handling, disposal of materials, products and waste Y/N/NA ➢ Washing applicators/containers Y/N/NA *Part 2.3.3*	Y	N	
Minimizes discharge/complies with restrictions of <u>fertilizer application</u>? *Part 2.3.5*	Y	N	N/A

Inspections and Corrective Action			
SWPPP describes procedures for <u>inspection, maintenance, and corrective action</u>? ➢ Personnel conducting inspections [Y]/N ➢ Inspection schedule [Y]/N ➢ Reduction of inspection frequency Y/N/[NA]. As applicable: o location of the rain gauge or the address of weather station to obtain rainfall data Y/N/NA o beginning and ending dates of the seasonally-defined arid period for your area or the valid period of drought Y/N/NA o beginning and ending dates of frozen conditions Y/N/NA ➢ Inspection or maintenance checklists or other forms that will be used [Y]/N *Parts 7.2.12*	[Y]	N	Incorrect inspection schedule, however. SWPPP at the time of this inspection indicated 14 day inspections, must be modified to 7 day inspections, and within 24 hours of a 0.25" rain event.
Inspections			**Notes:**
Inspections performed by "qualified" person? *Part 4.1.1*	[Y]	N	
Conducts inspections at a minimum of required frequency unless reductions documented? ➢ Every 7 days <u>or</u> 14 days & w/in 24 hrs of a 0.25" rain event Y/N *Part 4.1.2*	Y	[N]	Please see further explanations.
If applicable, conducts increased inspection frequency for sites with discharges to sediment or nutrient-impaired waters or Tier 2~~, 2.5~~ or 3 waters: ➢ Once every 7 days Y/N; <u>and</u> ➢ Within 24 hrs of a ≥ 0.25" rain event Y/N? *Parts 4.1.3, 3.3.2.1, 3.3.2*	Y	[N]	
If allowable (begin/end dates recorded), documents reduced inspection frequency? ➢ Stabilized area - 1/mo in areas where stabilization has been completed Y/N/NA ➢ For arid/semi arid during seasonally dry period or drought-stricken areas - 1/mo and wi/24 hrs of the occurrence of a storm event ≥ 0.25" Y/N/NA ➢ For frozen conditions (runoff unlikely, disturbance suspended, areas stabilized) - suspends until thawing conditions Y/N/NA *Part 4.1.4.1 thru 3*	Y	N	N/A
Inspection areas includes: ➢ All cleared, graded, excavated, and not completed stabilization [Y]/N ➢ All controls/measures [Y]/N ➢ Material/waste/borrow/equipment storage and maintenance areas [Y]/N ➢ All areas stormwater typically flows [Y]/N ➢ All points of discharge [Y]/N ➢ All locations stabilization implemented Y/N/[NA]	[Y]	N	

Part 4.1.5			
Inspection includes minimum requirements? ➢ Controls installed/operational Y/N ➢ Determines need to replace, repair, or maintain Y/N ➢ Conditions that could lead to spills, leaks, and accumulations of pollutants Y/N ➢ Identifies where new or modified controls are necessary Y/N ➢ At points of discharge, checks for visible erosion/sedimentation on banks Y/N/NA ➢ Identifies noncompliance Y/N ➢ If discharge is occurring: o Identifies all points of discharge Y/N o Observes/documents visual quality, including color, odor, floating, settled, or suspended solids, foam, oil sheen, and other of pollutants Y/N o Documents whether controls operating effectively, and describes controls not operating as intended or need maintenance Y/N ➢ Based on results of inspection, initiates corrective action under Part 5. *Part 4.1.6*	Y	N	Rain event inspection does not indicate the quality of the discharge.
Inspection reports: ➢ Completed within 24 hrs Y/N ➢ Includes inspection date Y/N ➢ Includes names/titles of personnel Y/N ➢ Includes summary of findings Y/N ➢ Includes applicable rain gauge reading Y/N/NA ➢ Signed and certified in accordance with Appendix I.11 Y/N *Part 4.1.7.1 and 2*	Y	N	Inspection reports do not contain documentation to show they were completed within 24 hours of the inspection. Signature delegation must be made to someone within the company functioning as owner/operator of the site.

Corrective Action			Notes:
Corrective action initiated immediately; and permanent solution completed no later than 7 calendar days from the time of discovery or if infeasible as soon as practicable? *Part 5*	Y	N	Inspection reports indicate that some problems were left unresolved for approximately two months.
Within 24 hours of discovering the occurrence, completes a report of the following: ➢ Condition identified Y/N ➢ Nature of the condition identified Y/N ➢ Date and time of the condition identified and how it was identified Y/N *Part 5.4*	Y	N	No corrective action reports contained in SWPPP.
Within 7 calendar days of discovering the occurrence, completes a report of the following: ➢ Follow-up actions taken to review the design, installation, and maintenance of stormwater controls, including the dates such actions occurred Y/N ➢ Summary of stormwater control modifications taken or to be taken Y/N ➢ Schedule of activities necessary to implement changes Y/N ➢ Date the modifications are completed or expected to be completed Y/N ➢ Notice of whether SWPPP modifications are required as a result of the condition identified or corrective action Y/N ➢ Signed and certified in accordance with Appendix I.11 Y/N *Parts 5.4.2, 5.4.3*	Y	N	

Additional Notes on SWPPP Review *(optional)*

The NOI for the facility was complete except for one item – the pollutants currently on the 303(d) impairments list that do not yet have a TMDL written for them. The most current 303(d) list can be found at: http://www.nmenv.state.nm.us/swqb/303d-305b/2012-2014/

No training had been documented or conducted (according to the onsite representative) pertaining to storm water quality requirements. The consultant who developed the site's plan included training topics, but no onsite training had yet utilized those suggestions. Part 6 of the permit indicates training requirements.

The map was almost complete for the site but did not note the receiving waterbody impairments on the map. Not only do the TMDL pollutants need to be noted, but the waterbody's designation as a "tiered" water needs to be documented on the map.

The permittee was conducting inspections every 14 days and within 24 hours of a 0.25" rain event. Parts 4.1.2 and 4.1.3 of the permit describes the process for determining the frequency of onsite inspections at a construction site. This site discharges to the Albuquerque MS4 (Municipal Separate Storm Sewer System), which directly discharges to the Rio Grande. The Rio Grande is a Tier 2 waterbody (Tier 1 for *E. coli*, acute aquatic toxicity, gross alpha, dissolved oxygen, PCBs and PCBs in fish tissue.) Since discharge is to a Tier 2 waterbody via the MS4, (please see the note in Part 3.2 of the permit), this requires inspections at the site every 7 days and within 24 hours of a 0.25" rain event.

The permittee had conducted two rain event inspections at the time of this inspection. However, those specific inspection forms did not document information regarding a few permit specifics. In part 4.1.6.6 it states that if a discharge is occurring during the inspection, the permittee must note all discharge points, observe and document the visual quality of the stormwater leaving the site, and document whether stormwater controls are operating effectively.

Another observation for inspection reports is that they must be completed 24 hours after the physical inspection. There was no documentation (i.e. dates) to show that the inspections were completed in that time frame.

Signatures on the inspection forms were of the third party contractor, Inspections Plus. Appendix I.11.2 describes the requirements for the persons signing documents associated with the SWPPP. All documents must be signed by a responsible corporate officer unless that has been delegated. The delegation must be made to "an individual or position having responsibility for the overall operation of the regulated facility or activity…or an individual or person having overall responsibility for environmental matters for the company." Although Inspections Plus had the delegation forms in the SWPPP allowing them to sign, this is no longer permitted. This was allowed under previous CGPs, but the 2012 permit language has been clarified, above, to indicate that the signatures must come from someone within the company acting as owner or operator.

There were no corrective action reports within the SWPPP. It was indicated in inspection reports that on May 15, 2012, the wattles on the west perimeter of the site needed repair. It was not corrected until August 22, 2012. Also on June 13, 2012, a dirt berm needed repair and was not documented as fixed until August 9, 2012. These needed repairs were not completed within 7 days as required by Part 5.2.1 and Part 2.3.2 of the permit.

A new sedimentation pond had been installed at the site. At the time of this inspection, it had been finally graded and no construction work had occurred in this area for approximately 30 days, according to the onsite representative. In Part 2.2.1.3.c, the permit states that sites discharging to a Tier 2 waterbody must initiate stabilization activities immediately, and complete their stabilization activities within 7 calendar days after cessation of construction activity. The onsite representative indicated that stabilization materials had been ordered and were on their way to the site.

Implementation *(complete in field)* ***(Narrative Description if Control Measures Installed, Operational, Effective and Maintained)***	
Erosion and Sediment Control Practices *Part 2.1*	
Minimize area of disturbance:	*(Provide brief description)* Entire site is 59 acres – current construction is Phase 1; 30 acres disturbed at this time.
Buffer compliance:	*(e.g., provide and maintain a 50-foot undisturbed natural buffer)* N/A
Perimeter controls:	*(e.g., filter berms, silt fences, temporary diversion dikes)* Silt fence, earth berms and erosion control sock installed at perimeter of the site.
Exit point or sediment track out:	*(e.g, aggregate stone with an underlying geotextile or non-woven filter fabric, or turf mats, wheel washing, rumble strips, plates, sweeping)* Aggregate stone was installed at the entrance/exit to the site. Appeared in good shape at the time of this inspection.
Stockpiled sediment or soil:	*(e.g., berms, dikes, fiber rolls, silt fences, sandbag, gravel bags)* No sediment stockpiles were observed at this time.
Minimize dust:	*(e.g., application of water or other dust suppression techniques)* A water truck applies water to the site approximately 3-4 times per day.
Steep slopes:	*(e.g., standard erosion and sediment control practices, phasing disturbances, stabilization practices)* N/A
Preserve topsoil:	*(e.g., stockpiling or transfer of topsoil to other locations)* N/A – site was previously paved.
Soil compaction:	*(e.g., restrict vehicle / equipment use, soil conditioning techniques)* Designated parking area. Traffic restricted on site.
Storm drain inlet protection:	*(e.g., fabric filters, sandbags, concrete blocks, gravel barriers)* Inlet protection not allowed in streets by CABQ. Perimeter controls are significant.
Conveyance channels:	*(e.g., erosion controls, and velocity dissipation check dams, sediment traps, riprap, or grouted riprap at outlets)* Newly installed sediment pond has an overflow structure that is riprapped to prevent erosion.
Sediment basin:	*(e.g., outlet structures that withdraw from the surface, stabilization, erosion controls, velocity dissipation, kept at least ½ design capacity)* Outlet structure does withdraw from surface. Stabilization had not been completed yet, although basin was at final grade for approximately 30 days.

Erosion and Sediment Control Practices - Continued	
Treatment chemicals:	*(e.g., spill berms, decks, spill containment pallets, storing chemicals in covered area, spill kit available on site)* N/A
Dewatering:	*(e.g., sediment basins or sediment traps, sediment socks, dewatering tanks, tube settlers, weir tanks, or filtration systems (e.g., bag or sand filters) designed to remove sediment)* N/A
Other erosion and sediment controls or practices:	*(Provide brief description)* N/A
Stabilization Practices *Part 2.2*	
Stabilization:	*(e.g., soil conditioning, application of seed or sod, planting of seedlings or other vegetation, application of fertilizer, watering, mulch, rolled erosion control products, control blankets, riprap, gabions, geotextiles)* Other than sedimentation basin, site is under active construction.
Are stabilization measures initiated immediately? Y/N Are they completed within 14 days of construction cessation? Y/N	*(e.g. indicate "yes" or "no"; if not within 14 days of construction cessation, how long without stabilization measures?)* No, sediment basin had not been temporarily stabilized at the time of inspection although it had been at final grade for about 30 days.
Pollution Prevention Measures *Part 2.3*	
Fueling and maintenance of vehicles:	*(e.g., locating activities away from surface waters and stormwater inlets or conveyances, providing secondary containment (e.g., spill berms, decks, spill containment pallets)and cover where appropriate, and/or having spill kits readily available)* Mobile fueling unit used onsite. No maintenance done at the site.
Washing equipment & vehicles:	*(e.g., locating activities away from surface waters, stormwater, inlets, conveyances, sediment basin or sediment trap, using filtration devices, such as filter bags or sand filters, plastic sheeting, temporary roofs)* No vehicle washing occurs at the site.
Washing applicators/containers (e.g., stucco, paint, concrete, form release oils, curing compounds, and other construction materials)	*(e.g., leak-proof container or pit, locate as far away as possible from surface waters, inlets or conveyances, designate areas)* No stucco was being used at the time of inspection. Concrete washout was contained in a mobile roll-off unit.

Pollution Prevention Measures – Continued	
Storage, handling, disposal of construction materials, products and waste:	*Building products (e.g., asphalt sealants, copper flashing, roofing materials, adhesives, concrete admixtures):* Trash contained in mobile roll-off dumpster, uncovered. Permittee may consider a cover overnight and on windy days.

	Pesticides, herbicides, insecticides, fertilizers, and landscape materials: Not in use at the time of this inspection.
	Diesel fuel, oil, hydraulic fluids, other petroleum products, and other chemicals: Any chemicals stored on site are stored in mobile locking storage units. Fueling is not done on site.
	Hazardous or toxic waste (e.g, paints, solvents, petroleum-based products, wood preservatives, additives, curing compounds, acids): Stored indoors.
	Construction and domestic waste (e.g., packaging materials, scrap construction materials, masonry products, timber, pipe and electrical cuttings, plastics, styrofoam, concrete, and other trash or building materials): Construction waste sent to on site dumpster.
	Sanitary waste: 4 portolets located on site for employee's use.
Fertilizer application:	*(e.g., avoids applying before heavy rains, never applies to frozen ground, never applies to conveyance channels with flowing water)* Not in use at the time of this inspection.
Miscellaneous	
Evidence of not allowable non-storm water discharges or prohibited discharge?	*(Provide brief description and determine whether any non-storm water discharges allowable)* No not allowable non stormwater discharges noted during this inspection.
Evidence of sediment deposition to surface waters or MS4?	*(e.g. significant turbidity observed in a receiving water body)* None observed.