



NEW MEXICO
ENVIRONMENT DEPARTMENT



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.nmenv.state.nm.us

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

September 8, 2014

Mr. Tom Ashe, Owner
Placitas Development Corporation
01 Ridge Court
Placitas, NM 87043

Re: Petroglyph Trails Subdivision Construction; Minor; General Permit; SIC 1542; NPDES Compliance Evaluation Inspection; NMR12AR79; August 15, 2014

Dear Mr. Ashe:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility 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.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sarah Holcomb at 505-827-2798 or at sarah.holcomb@state.nm.us.

Sincerely,

/s/ Bruce J. Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Everett Spencer, USEPA (6WQ-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
NMED District 1, William Chavez by e-mail



NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="R"/> 4 <input type="text" value="1"/> 5 <input type="text" value="2"/> 6 <input type="text" value="A"/> 7 <input type="text" value="R"/> 8 <input type="text" value="7"/> 9 <input type="text" value="9"/> 10 <input type="text" value="11"/> 11 <input type="text" value="12"/> 12 <input type="text" value="1"/> 13 <input type="text" value="4"/> 14 <input type="text" value="0"/> 15 <input type="text" value="8"/> 16 <input type="text" value="1"/> 17 <input type="text" value="5"/> 18 <input type="text" value="17"/> 19 <input type="text" value="18"/> 20 <input type="text" value="C"/> 21 <input type="text" value="19"/> 22 <input type="text" value="S"/> 23 <input type="text" value="20"/> 24 <input type="text" value="2"/>					
Remarks					
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Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 69	70 <input type="text" value="4"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	74 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 75 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 76 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 77 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 78 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 79 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 80

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) PETROGLYPH TRAILS SUBDIVISION, PLACITAS, SANDOVAL COUNTY, NM: from I-25, exit 242 and head east on Hwy 165. Turn left on Frontage Rd., and travel north to Trails Rd. Turn right into subdivision and travel past fire station to the location of the subdivision.	Entry Time /Date 0930 / 8-15-2014	Permit Effective Date 2-16-2012
	Exit Time/Date 1250 / 8-15-2014	Permit Expiration Date 2-15-2017
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Kelley Fetter, President, E2RC, LLC (505) 867-4040	Other Facility Data SIC 1542	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Tom Ashe, Owner, Placitas Development Corporation (505) 259-3411 01 Ridge Ct., Placitas, NM 87043	Yes <input type="checkbox"/> No <input type="checkbox"/> * <input type="checkbox"/>	GPS: N. 35° 19' 24" W. -106° 31' 13"

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	N	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	M	Storm Water	N	Other:

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

- Inspector arrived on site and made contact with Mr. Kelley Fetter of E2RC, LLC. During the entrance interview, introductions were made, credentials were presented and the purpose of the inspection was discussed with Mr. Fetter (Mr. Ashe was unavailable). An exit interview was conducted with Mr. Fetter at the site on 8-15-2014.
- Please see report for further information.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-827-2798	Date 9-8-2014
Signature of Management QA Reviewer Bruce J. Yurdin /s/ Bruce J. Yurdin	Agency/Office/Phone and Fax Numbers 505-827-2795	Date 9-8-2014

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

National Database Information			General	
Inspection Type	CEI		Inspector Name	Sarah Holcomb
NPDES ID Number	NMR12AR79		Telephone	505-827-2798
Inspection Date	8-15-2014		Entry Time	0930 hours
Inspector Type (circle one)	EPA	<input checked="" type="checkbox"/> State	EPA Oversight	Exit Time 1250 hours
Facility Type (circle one)	Commercial /	<input checked="" type="checkbox"/> Residential	/	Signature <i>/s/ Sarah Holcomb</i>
	Municipal /	Industrial		

Facility Location Information			
Name/Location/Mailing Address	Petroglyph Trails Subdivision, Placitas, NM 01 Ridge Court, Placitas, NM 87043		
Coordinates	Latitude	35° 19' 24"	Longitude -106° 31' 13"
Receiving Waters	Arroyo Agua Sarca thence to the Bernalillo Irrigation Canal, thence to the Rio Grande in segment 20.6.4.106 NMAC.		
Disturbed Area	40 acres	Start/Stop Dates	1-20-2014/approx. 6-30-2014

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Placitas Development Corporation (PDC)	505-867-6566
Facility Contact	Mr. Kelley Fetter, E2RC, LLC	505-867-4040
Authorized Official(s)	Mr. Tom Ashe, President, PDC	505-867-6566

Site Information: <i>circle all that apply</i>							
Nature of Project	<input checked="" type="checkbox"/> Residential	Commercial / Industrial	Roadway	<input checked="" type="checkbox"/> Private	Federal	State / Municipal	Other
Construction Stage	Clearing / Grubbing	Rough Grading	Infrastructure	Building (Vertical)	Final Grading	<input checked="" type="checkbox"/> Final Stabilization	

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	N	SWPPP Prepared & Available? <i>Part 7.1.1, 7.2.1</i>	<input checked="" type="checkbox"/> Y	N
Permit Type	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory?	Y	<input checked="" type="checkbox"/> N
Notice Posted (visible, font large, NPDES Permit tracking#, contact name & phone #) <i>Part 1.5</i>	<input checked="" type="checkbox"/> Y	N	SWPPP Implementation Satisfactory?	Y	<input checked="" type="checkbox"/> N
NOI Date	4-15-2014		SWPPP Date	1-16-2014	
Is NOI Satisfactory?	<input checked="" type="checkbox"/> Y	N			

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

SWPPP Review <i>(can be completed in office)</i>			
General	Notes:		
SWPPP Signed/Certified. Did all operators sign/certify the SWPPP? <i>Part 7.2.15, Appendix I.11</i>	<input checked="" type="checkbox"/>	N	Tom Ashe signed on 1-28-14
SWPPP completed prior to NOI? <i>Part 7.1.1, Part 1.2.1</i>	<input checked="" type="checkbox"/>	N	
Endangered Species Act. Does SWPPP include documentation supporting determination? <i>Part 7.2.14.1; Part 1.1.e, Appendix D</i>	Y	<input checked="" type="checkbox"/>	Permittee certified Criterion A but did not have documentation in the SWPPP to support A. Criterion C may be more appropriate.
Historic Properties. Does SWPPP include documentation supporting determination? <i>Part 7.2.14.2, Appendix E</i>	<input checked="" type="checkbox"/>	N	
If applicable, documents contact with agency or office responsible for implementing Safe Drinking Water Act <u>underground injection control well(s)</u>? <i>Part 7.2.14.3, 40 CFR Parts 144 -147</i>	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 <i>Part 7.2.16.3</i>	<input checked="" type="checkbox"/>	N	
If applicable, SWPPP describes compliance with any case-by-case basis USEPA imposed water quality-based effluent limitation requirements? <i>Part 3</i>	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 <i>Part 3.2.1, Appendix I.15</i>	Y	N	N/A
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 <i>Parts 7.4, 5.2.2, Appendix I.11.b</i>	Y	N	Documentation available did not show need for SWPPP modifications.
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? <i>Parts 4.1.7, 5.4.4, Appendix I.10.2, I.15</i>	<input checked="" type="checkbox"/>	N	

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

Team & Activity Description			Notes:
<p>Identifies stormwater team personnel and responsibilities?</p> <ul style="list-style-type: none"> ➤ Personnel (by name or position) Y/N ➤ Individual responsibilities Y/N <p><i>Part 7.2.1</i></p>	<input checked="" type="checkbox"/>	N	
<p>Is staff training documented?</p> <ul style="list-style-type: none"> ➤ Training occurs prior to the commencement of earth-disturbing activities or pollutant-generating activities, whichever occurs first Y/<input checked="" type="checkbox"/> ➤ Ensures following understand the requirements of this permit and their specific responsibilities: <ul style="list-style-type: none"> ○ Personnel responsible for the design, installation, maintenance, and/or repair of controls/measures <input checked="" type="checkbox"/>/N ○ Personnel responsible for the application and storage of treatment chemicals Y/N/<input checked="" type="checkbox"/>/NA ○ Personnel responsible for conducting inspections <input checked="" type="checkbox"/>/N ○ Personnel responsible for taking corrective actions Y/<input checked="" type="checkbox"/> ➤ At a minimum, training includes: <ul style="list-style-type: none"> ○ Location of all stormwater controls on the site required by this permit, and how maintained Y/N ○ Proper procedures to follow with respect to the permit’s pollution prevention requirements Y/N ○ When and how to conduct inspections, record applicable findings, and take corrective actions Y/N <p><i>Parts 7.2.13, 6 and permit notes for emergency-related construction activities</i></p>	Y	<input checked="" type="checkbox"/>	<p>Some training is documented, namely for the third party consulting firm hired to conduct inspections. Training is not documented for the owner/operator.</p>
<p>Describes nature of construction activities?</p> <ul style="list-style-type: none"> ➤ Size of the property <input checked="" type="checkbox"/>/N ➤ Total area to be disturbed <input checked="" type="checkbox"/>/N ➤ Construction support activity areas Y/N/<input checked="" type="checkbox"/>/NA ➤ Maximum area to be disturbed at any one time <input checked="" type="checkbox"/>/N <p><i>Part 7.2.2</i></p>	<input checked="" type="checkbox"/>	N	
<p>If applicable, documents emergency-related projects?</p> <ul style="list-style-type: none"> ➤ 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 	Y	N	N/A

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

<ul style="list-style-type: none"> ➤ Description of the construction necessary to reestablish effected public services Y/N <i>Parts 7.2.3, 1.2</i> 			
<p>Identifies (lists) other site operators and areas of site over which each has control?</p> <ul style="list-style-type: none"> ➤ List and areas of site over which each has control Y/N <i>Part 7.2.4</i> 	Y	N	<p>N/A – Tom Ashe of Placitas Development Corporation is acting as both the owner and operator.</p>
<p>Describes sequence, estimated dates (departures) and duration of construction activities?</p> <ul style="list-style-type: none"> ➤ 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 ➤ 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 <i>Part 7.2.5</i> 	Y	<input type="checkbox"/> N	<p>Estimated dates are contained in the SWPPP. Dates of actual activity had not been kept current in the SWPPP at the time of the inspection. SWPPP referred to contractor’s site schedule, which was not on site at the time of the inspection.</p>
Site Map		Notes:	
<p>Includes legible site map(s)? <i>Part 7.2.6</i></p>	Y	<input type="checkbox"/> N	<p>No site-specific map was located in the SWPPP.</p>
<ul style="list-style-type: none"> ➤ 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 ➤ 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 <i>Part 7.2.6.1</i> 	Y	<input type="checkbox"/> N	
<ul style="list-style-type: none"> ➤ Locations of surface waters/wetlands, within or in immediate vicinity Y/N ➤ Indicates waters listed as impaired, and Tier 2, Tier 2.5, or Tier 3 Y/N <i>Part 7.2.6.2</i> 	Y	<input type="checkbox"/> N	

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

➤ Boundary lines of natural buffers <i>Parts 7.2.6.3, 2.1.2.1a</i>	Y	<input type="checkbox"/> N	But may not have been needed. Some work was done in the channel, presumably under a CWA Section 404 permit.
➤ Areas of federally-listed critical habitat for endangered or threatened species <i>Part 7.2.6.4</i>	Y	<input type="checkbox"/> N	
➤ Topography Y/N ➤ Existing vegetative cover Y/N ➤ Drainage pattern of stormwater/authorized non-stormwater flow onto, over, and from site <u>before and after</u> major grading Y/N <i>Part 7.2.6.5</i>	Y	<input type="checkbox"/> N	
➤ 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 <i>Part 7.2.6.6</i>	Y	<input type="checkbox"/> N	
➤ Locations of potential pollutant-generating activities <i>Part 7.2.6.7, Part 7.2.7</i>	Y	<input type="checkbox"/> N	
➤ Locations of control measures <i>Part 7.2.6.8</i>	Y	<input type="checkbox"/> N	
➤ Locations polymers, flocculants, or treatment chemicals will be used/stored <i>Part 7.2.6.9</i>	Y	N	N/A
Construction Site Pollutants		Notes:	
Includes pollutant-generating activities list and description? <i>Part 7.2.7.1</i>	<input type="checkbox"/> Y	N	
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 <i>Parts 7.2.7.2, 2.3.5.1</i>	<input type="checkbox"/> Y	N	
Identifies all sources of allowable non-stormwater discharges? <i>Parts 7.2.8, 1.3.d</i>	<input type="checkbox"/> Y	N	However, hydrant flushing may have occurred prior to the current consultant being on site. No dates in SWPPP to confirm when this occurred.
If required (surface water w/50 feet of earth disturbance), documents and describes <u>buffer compliance alternative</u> 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,	Y	N	N/A

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

<p>tape, or other similar marking device all natural buffer areas Y/N/NA</p> <ul style="list-style-type: none"> ➤ 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 <p><i>Parts 7.2.9, 2.1.2, Appendix G</i></p>			
<p>As applicable, describes and documents <u>buffer exceptions</u>?</p> <ul style="list-style-type: none"> ➤ 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 <p><i>Parts 7.2.9; 2.1.2.1e, Appendix G</i></p>	Y	N	N/A
All Stormwater Control Measures	Notes:		
<p>Describes each measure?</p> <ul style="list-style-type: none"> ➤ 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 <p><i>Part 7.2.10.1</i></p>	<input checked="" type="checkbox"/>	N	
Erosion and Sediment Controls	Notes:		
<p>Minimizes <u>area of disturbance</u>?</p> <p><i>Part 2.1.1.1</i></p>	<input checked="" type="checkbox"/>	N	
<p>Describes erosion and sediment control <u>design requirements</u>?</p> <ul style="list-style-type: none"> ➤ 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 ➤ Complies with State of New Mexico except Indian country requirements: <ul style="list-style-type: none"> ○ Includes site-specific BMPs/controls designed to prevent to the maximum 	Y	<input checked="" type="checkbox"/>	<p>RUSLE calculation was not in the SWPPP at the time of the inspection. It was received via email by the inspector at approximately 4:30pm on Friday, August 15, 2014. Calculation is attached, but does not account for frequency, intensity or duration of rain events.</p>

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

<p>extent practicable an increase in sediment yield/flow velocity from pre-construction, pre-development conditions both during and after construction Y/N</p> <ul style="list-style-type: none"> ○ 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 and flow velocities from pre-construction, pre-development conditions) Y/N <p><i>Parts 2.1.1.2, 9.4.1.1</i></p>			
<p>Describes erosion and sediment control installation requirements?</p> <ul style="list-style-type: none"> ➤ 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 <p><i>Part 2.1.1.3</i></p>	Y	N	
<p>Describes erosion and sediment control maintenance requirements?</p> <ul style="list-style-type: none"> ➤ 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 <p><i>Part 2.1.1.4</i></p>	Y	N	
<p>Installs perimeter controls and describes maintenance (removes sediment before it has accumulated to 1/2 of the above-ground height)?</p> <p><i>Part 2.1.2.2</i></p>	Y	N	
<p>Minimizes sediment track-out?</p> <ul style="list-style-type: none"> ➤ 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 <p><i>Part 2.1.2.3</i></p>	Y	N	<p>At the time of the inspection, the road had been stabilized. One picture in an inspection showed that a rocked entrance had been installed at some point during the project lifespan.</p>
<p>Controls discharges from stockpiled sediment or soil?</p> <ul style="list-style-type: none"> ➤ Locates piles outside of buffers Y/N 	Y	N	N/A

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

<ul style="list-style-type: none"> ➤ Locates piles separate from stormwater controls Y/N ➤ Uses temporary sediment barrier Y/N ➤ 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 <p><i>Part 2.1.2.4</i></p>			
<p>Minimizes <u>dust</u>? <i>Part 2.1.2.5</i></p>	Y	N	
<p>Minimizes disturbance of <u>steep slopes</u>? <i>Part 2.1.2.6</i></p>	Y	N	N/A
<p>Preserves <u>topsoil</u>, unless infeasible? <i>Part 2.1.2.7</i></p>	Y	N	N/A
<p>Minimizes <u>soil compaction</u> where final vegetative stabilization or infiltration installed? <i>Part 2.1.2.8</i></p>	Y	N	
<p>Protects <u>storm drain inlets</u> and describes maintenance requirements (removes sediment by the end of the same work day or end of the following work day)? <i>Part 2.1.2.9</i></p>	Y	N	N/A
<p>Describes <u>constructed conveyance channel</u> controls (if installed)? <i>Part 2.1.3.1</i></p>	Y	N	N/A
<p>Describes <u>sediment basin</u> design (if installed) and maintenance (maintain at least ½ of capacity at all times)? <i>Part 2.1.3.2</i></p>	Y	N	N/A
<p>Describes <u>treatment chemical</u> controls (if used)? <i>Part 2.1.3.3</i></p>	Y	N	N/A
<p>Includes documentation for use of <u>treatment chemicals</u> (polymers, flocculants, or other treatment chemicals)?</p> <ul style="list-style-type: none"> ➤ 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 	Y	N	N/A

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

<ul style="list-style-type: none"> ➤ 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 <p><i>Parts 7.2.10.2, 2.1.3.3h</i></p>			
Describes dewatering controls (if installed)? <i>Part 2.1.3.4</i>	Y	N	N/A
Stabilization Requirements	Notes:		
Describes compliance with deadlines for vegetative and/or non-vegetative stabilization practices, including exceptions? <u>Deadline to Initiate</u> <ul style="list-style-type: none"> ➤ Initiates stabilization immediately (no later than end of next work day following earth-disturbing activities permanently/temporarily ceased) Y/<input type="checkbox"/>N <u>Deadline to Complete</u> <ul style="list-style-type: none"> ➤ 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) <input type="checkbox"/>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 <input type="checkbox"/>Y/N/NA ➤ Documents/describes circumstances beyond control that prevent meeting deadlines Y/N/<input type="checkbox"/>NA ➤ If discharging to sediment or nutrient-impaired waters or Tier 22.5 or 3 waters, completes stabilization (vegetative or non-vegetative) w/7 calendar days after temporary or permanent cessation Y/N/<input type="checkbox"/>NA <p><i>Parts 7.2.10.3, 2.2.1, 3, 9.4.1.3</i></p>	Y	<input type="checkbox"/> N	
Describes compliance with vegetative (final) stabilization criteria? <ul style="list-style-type: none"> ➤ 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 	<input type="checkbox"/> Y	N	

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<ul style="list-style-type: none"> ➤ 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 <p><i>Parts 7.2.10.3, 2.2.2.a, 3, 9.4.1.4</i></p>			
<p>If applicable, describes compliance with State of New Mexico, except Indian country, arid, semi-arid areas, or drought stricken option for final stabilization:</p> <ul style="list-style-type: none"> ➤ Area seeded/planted must within 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 <p><i>Parts 7.2.10.3, 2.2.2.b, 3, 9.4.1.5</i></p>	<input checked="" type="checkbox"/>	N	
<p>If using, provides effective non-vegetative cover to stabilize?</p> <p><i>Parts 7.2.10.3, 2.2.2.2</i></p>	Y	N	N/A
Pollution Prevention Procedures		Notes:	
<p>Describes procedures for <u>spill prevention and response</u>?</p> <p><i>Parts 7.2.11.1, 2.3.4</i></p>	<input checked="" type="checkbox"/>	N	
<p>Describes procedures for <u>waste management</u>?</p> <p><i>Part 7.2.11.2, 2.3.3.3</i></p>	<input checked="" type="checkbox"/>	N	
<p>Eliminates prohibited discharges?</p> <ul style="list-style-type: none"> ➤ 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 ➤ Toxic or hazardous substances from spill/release Y/N <p><i>Part 2.3.1</i></p>	<input checked="" type="checkbox"/>	N	
<p>Properly maintains and protects all pollution prevention controls?</p> <p><i>Part 2.3.2</i></p>	<input checked="" type="checkbox"/>	N	
<p>Complies with pollution prevention standards for certain activities?</p> <ul style="list-style-type: none"> ➤ Fueling/maintenance of equipment or vehicles Y/<input checked="" type="checkbox"/>/NA ➤ Washing of equipment and vehicles Y/N/<input checked="" type="checkbox"/> ➤ Storage, handling, disposal of materials, products and waste <input checked="" type="checkbox"/>/N/NA ➤ Washing applicators/containers Y/N/<input checked="" type="checkbox"/> 	Y	<input checked="" type="checkbox"/>	<p>According to the complaint, which prompted this inspection, there were instances of leaking equipment, which resulted in contaminated soil. There was no documentation in the SWPPP to indicate how long the soil was left in place or when it was remediated.</p>

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<i>Part 2.3.3</i>			
Minimizes discharge/complies with restrictions of fertilizer application?	Y	N	N/A
<i>Part 2.3.5</i>			
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: ○ location of the rain gauge or the address of weather station to obtain rainfall data Y/N/NA ○ beginning and ending dates of the seasonally-defined arid period for your area or the valid period of drought Y/N/NA ○ beginning and ending dates of frozen conditions Y/N/NA ➤ Inspection or maintenance checklists or other forms that will be used Y/N <i>Parts 7.2.12</i>	<input checked="" type="checkbox"/>	N	
Inspections	Notes:		
Inspections performed by “qualified” person? <i>Part 4.1.1</i>	<input checked="" type="checkbox"/>	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 <i>Part 4.1.2</i>	<input checked="" type="checkbox"/>	N	
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? <i>Parts 4.1.3, 3.3.2.1, 3.3.2</i>	Y	N	N/A
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 <i>Part 4.1.4.1 thru 3</i>	Y	N	N/A
Inspection areas includes: ➤ All cleared, graded, excavated, and not completed stabilization Y/N ➤ All controls/measures Y/N	<input checked="" type="checkbox"/>	N	

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<ul style="list-style-type: none"> ➤ 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 <p><i>Part 4.1.5</i></p>			
<p>Inspection includes minimum requirements?</p> <ul style="list-style-type: none"> ➤ 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: <ul style="list-style-type: none"> ○ Identifies all points of discharge Y/N ○ Observes/documents visual quality, including color, odor, floating, settled, or suspended solids, foam, oil sheen, and other of pollutants Y/N ○ 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. <p><i>Part 4.1.6</i></p>	Y	N	
<p>Inspection reports:</p> <ul style="list-style-type: none"> ➤ Completed within 24 hrs Y/<input checked="" type="checkbox"/>N ➤ Includes inspection date <input checked="" type="checkbox"/>Y/N ➤ Includes names/titles of personnel <input checked="" type="checkbox"/>Y/N ➤ Includes summary of findings <input checked="" type="checkbox"/>Y/N ➤ Includes applicable rain gauge reading <input checked="" type="checkbox"/>Y/N/NA ➤ Signed and certified in accordance with Appendix I.11 Y/<input checked="" type="checkbox"/>N <p><i>Part 4.1.7.1 and 2</i></p>	Y	<input checked="" type="checkbox"/> N	<p>Third party inspectors were signing on behalf of the company. The permit does not allow delegation of the signatory authority outside of the owner/operator entities.</p>

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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? <i>Part 5</i>	Y	N	No corrective actions had been documented to have been taken at the time of this inspection.
Within 24 hours of discovering the occurrence, completes a report of the following: <ul style="list-style-type: none"> ➤ 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 <i>Part 5.4</i>	Y	N	No corrective actions had been documented to have been taken at the time of this inspection.
Within 7 calendar days of discovering the occurrence, completes a report of the following: <ul style="list-style-type: none"> ➤ 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 <i>Parts 5.4.2, 5.4.3</i>	Y	N	No corrective actions had been documented to have been taken at the time of this inspection.

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

Implementation (complete in field) <i>(Narrative Description if Control Measures Installed, Operational, Effective and Maintained)</i>	
Erosion and Sediment Control Practices Part 2.1	
Minimize area of disturbance:	<i>(Provide brief description)</i> N/A
Buffer compliance:	<i>(e.g., provide and maintain a 50-foot undisturbed natural buffer)</i> Project was initiated to install infrastructure and roads as part of a future housing subdivision. Some work was done to improve drainage in the Arroyo Agua Sarca under a Section 404 permit, but there were no buffer requirements addressed in the SWPPP.
Perimeter controls:	<i>(e.g., filter berms, silt fences, temporary diversion dikes)</i> Silt fences installed on site were in need of repair/replacement.
Exit point or sediment track out:	<i>(e.g., aggregate stone with an underlying geotextile or non-woven filter fabric, or turf mats, wheel washing, rumble strips, plates, sweeping)</i> Road was stabilized at the time of the inspection.
Stockpiled sediment or soil:	<i>(e.g., berms, dikes, fiber rolls, silt fences, sandbag, gravel bags)</i> None observed.
Minimize dust:	<i>(e.g., application of water or other dust suppression techniques)</i> According to third party contractor, no current dust control was occurring because the road had been stabilized.
Steep slopes:	<i>(e.g., standard erosion and sediment control practices, phasing disturbances, stabilization practices)</i> N/A
Preserve topsoil:	<i>(e.g., stockpiling or transfer of topsoil to other locations)</i> N/A
Soil compaction:	<i>(e.g., restrict vehicle / equipment use, soil conditioning techniques)</i> N/A
Storm drain inlet protection:	<i>(e.g., fabric filters, sandbags, concrete blocks, gravel barriers)</i> N/A
Conveyance channels:	<i>(e.g., erosion controls, and velocity dissipation check dams, sediment traps, riprap, or grouted riprap at outlets)</i> At the time of this inspection, conveyance channels from the top of the mesa down to the Arroyo Agua Sarca were reinforced with riprap.

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Sediment basin:	<p><i>(e.g., outlet structures that withdraw from the surface, stabilization, erosion controls, velocity dissipation, kept at least ½ design capacity)</i></p> <p>N/A – none installed.</p>
Erosion and Sediment Control Practices - Continued	
Treatment chemicals:	<p><i>(e.g., spill berms, decks, spill containment pallets, storing chemicals in covered area, spill kit available on site)</i></p> <p>N/A</p>
Dewatering:	<p><i>(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)</i></p> <p>N/A</p>
Other erosion and sediment controls or practices:	<p><i>(Provide brief description)</i></p> <p>N/A</p>
Stabilization Practices Part 2.2	
Stabilization:	<p><i>(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)</i></p> <p>Constructed ceased (according to the third party contractor) on August 13th, and stabilization measures were scheduled to begin on August 20th.</p>
Are stabilization measures initiated immediately? Y/N Are they completed within 14 days of construction cessation? Y/N	<p><i>(e.g. indicate “yes” or “no”; if not within 14 days of construction cessation, how long without stabilization measures?)</i></p> <p>No, measures were not initiated immediately. If the schedule noted on site is adhered to, it appears that the stabilization measures (hydroseeding) will be completed within 14 days.</p>
Pollution Prevention Measures Part 2.3	
Fueling and maintenance of vehicles:	<p><i>(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)</i></p> <p>No oil or fluid spills were observed at the time of the inspection, but had occurred in the past.</p>
Washing equipment & vehicles:	<p><i>(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)</i></p> <p>N/A</p>

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Washing applicators/containers (e.g., stucco, paint, concrete, form release oils, curing compounds, and other construction materials)	<p><i>(e.g., leak-proof container or pit, locate as far away as possible from surface waters, inlets or conveyances, designate areas)</i></p> <p>N/A</p>
Pollution Prevention Measures – Continued	
Storage, handling, disposal of construction materials, products and waste:	<p><i>Building products (e.g., asphalt sealants, copper flashing, roofing materials, adhesives, concrete admixtures):</i></p> <p>N/A</p>
	<p><i>Pesticides, herbicides, insecticides, fertilizers, and landscape materials:</i></p> <p>N/A</p>
	<p><i>Diesel fuel, oil, hydraulic fluids, other petroleum products, and other chemicals:</i></p> <p>N/A</p>
	<p><i>Hazardous or toxic waste (e.g. paints, solvents, petroleum-based products, wood preservatives, additives, curing compounds, acids):</i></p> <p>N/A</p>
	<p><i>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):</i></p> <p>N/A</p>
	<p><i>Sanitary waste:</i></p> <p>A port-o-let was located directly next to the Arroyo Agua Sarca without any BMPs present. This must be moved.</p>
Fertilizer application:	<p><i>(e.g., avoids applying before heavy rains, never applies to frozen ground, never applies to conveyance channels with flowing water)</i></p> <p>N/A</p>
Miscellaneous	
Evidence of not allowable non-storm water discharges or prohibited discharge?	<p><i>(Provide brief description and determine whether any non-storm water discharges allowable)</i></p> <p>No non-stormwater discharges were observed at the time of the inspection.</p>
Evidence of sediment deposition to surface waters or MS4?	<p><i>(e.g. significant turbidity observed in a receiving water body)</i></p> <p>No sediment deposition was observed at the time of the inspection.</p>

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

NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Unknown	Date: 5-4-2014	Time: Unknown
City/County: Placitas, Sandoval County		
Location: Petroglyph Trails Subdivision		
Subject: Blown out BMP noted at the time of the complaint.		



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

NMED/SWQB

Official Photograph Log

Photo # 2

Photographer: Unknown	Date: 5-4-2014	Time: Unknown
City/County: Placitas, Sandoval County		
Location: Petroglyph Trails Subdivision		
Subject: Some stained soil noted at the time of the complaint.		



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

NMED/SWQB

Official Photograph Log

Photo # 3

Photographer: Sarah Holcomb	Date: 8-15-2014	Time: 1358 hours
City/County: Placitas, Sandoval County		
Location: Petroglyph Trails Subdivision		
Subject: Installed riprap in Arroyo Agua Sarca.		

