NEW MEXICO
ENVIRONMENT DEPARTMENT

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lt. 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.env.nm.gov

RYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

December 4, 2015

Mr. Geoffrey Wormer, CEO
Catamount Constructors, Inc.
1527 Cole Blvd., Suite 100
Lakewood, CO 80401

Re: Animas Business Park Construction Project, Construction Storm Water, SIC 1541, NPDES Compliance Evaluation Inspection, NPDES Permit NMR12AV54, November 20, 2015

Dear Mr. Wormer:

Enclosed please find a copy of the report and checklist 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 Yurdin

Bruce Yurdin
Surface Water Quality Bureau

Cc: Carol Peters-Wagnon (6EN-AS) by email
Everett Spencer, USEPA (6EN-AS) by email
Darlene Whitten-Hill, USEPA (6EN-AS) by email
Racquel Douglas, USEPA (6EN-WM) by email
Robert Italiano, NMED District 2 Manager, 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 V 5 4 11	12 1 5 1 1 2 0 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 2	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)*	Entry Time /Date	Permit Effective Date
Animas Business Park Construction Project, Bloomfield, San Juan County, NM: From Hwy 550, turn North on Hwy 544 and head approximately 2.6 miles to 200 Louisiana St.	0815 hours / 11-20-2015	2-16-2012
	Exit Time/Date 1000 hours / 11-20-2015	Permit Expiration Date 2-16-2017

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Mr. Lee Gelderman, Project Engineer

Name, Address of Responsible Official/Title/Phone and Fax Number
Mr. Geoffrey Wormer, CEO, Catamount Constructors, Inc. (720) 257-1573
1527 Cole Blvd., Suite 100, Lakewood, CO 80401

Contacted: Yes [ ] No [*]

Other Facility Data

GPS:
N. 36° 750008'
W. -107° 979597'

SIC 1541

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**
U	**Records/Reports**	N	**Self-Monitoring Program**	N	**Sludge Handling/Disposal**	N	**Pollution Prevention**
M	**Facility Site Review**	N	**Compliance Schedules**	N	**Pretreatment**	N	**Multimedia**
N	**Effluent/Receiving Waters**	N	**Laboratory**	M	**Storm Water**	N	**Other:**

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

1. **Inspector arrived at the site at 0815 hours on November 20, 2015. An entrance interview was conducted with Mr. Lee Gelderman, Project Engineer (Catamount Constructors) where she made introductions, presented credentials and explained the purpose of the inspection.**
2. **An exit interview was conducted at the site with Mr. Gelderman and Mr. Jim Summit, Site Superintendent (via phone) for Catamount Constructors, Inc. at approximately 0950 hours where the inspector discussed the preliminary findings of the inspection.**
3. **Please see report for further information.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sarah Holcomb ***/s/ Sarah Holcomb***	**505-827-2798**	**12-4-15**
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Bruce Yurdin ***/s/ Bruce Yurdin***	**505-827-2795**	**12-4-15**

National Database Information		General	
Inspection Type	CEI	Inspector Name	Sarah Holcomb
NPDES ID Number	NMR12AV54/NMU001905	Telephone	505-827-2798
Inspection Date	November 20, 2015	Entry Time	0815 hours
Inspector Type (circle one)	EPA [State] EPA Oversight	Exit Time	1000 hours
Facility Type (circle one)	Commercial / Residential / Municipal / Industrial	Signature	*/s/ Sarah Holcomb*

Facility Location Information				
Name/Location/Mailing Address	Animas Business Park Construction Project Mailing address: Catamount Constructors, Inc. – 1527 Cole Blvd., Suite 100, Lakewood, CO 80401 Wagner Equipment – 4000 Osuna Rd., Albuquerque, NM 87109			
Coordinates	Latitude	36° 750008' N	Longitude	-107° 979597' W
Receiving Waters	Unnamed arroyo thence to San Juan River in segment 20.6.4.408 NMAC			
Disturbed Area	19.6 acres	Start/Stop Dates	Unknown to October 2016	

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Wagner Equipment (WE) – plans & specs Catamount Constructors, Inc. (CC) – day to day operations	
Facility Contact	Mr. Jim Summit, Site Superintendent (CC)	720-257-1573
Authorized Official(s)	Mr. Goeffrey Wormer, CEO (CC) Mr. Michael Quirk, Vice President (WE)	720-257-1573 505-345-8411

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] (CC)	[N] (WE)	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	5-15-14		SWPPP Date	N/A	
Is NOI Satisfactory?	Y	[N]			

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	No SWPPP was available for review at the time of the inspection, although CC was performing weekly inspections of the site and documenting those.
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	NOI indicated eligibility under Criterion A, however, there was no documentation to support this.
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 <u>underground injection control well(s)</u>? *Part 7.2.14.3, 40 CFR Parts 144 -147*	Y	N	NA
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	NA
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	NA – No SWPPP available.
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	BMP modifications were not documented.
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	Inspection reports were present and available for review.

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	NA – No SWPPP available.
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	NA – No SWPPP available.
Describes nature of construction activities? ➢ Size of the property Y/N ➢ Total area to be disturbed Y/N ➢ Construction support activity areas Y/N/NA ➢ Maximum area to be disturbed at any one time Y/N *Part 7.2.2*	Y	N	NA – No SWPPP available.
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	NA

Identifies (lists) other site operators and areas of site over which each has control? ➢ List and areas of site over which each has control Y/N *Part 7.2.4*	Y	N	NA – No SWPPP available.
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 ➢ 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	NA – No SWPPP available.
Site Map			**Notes:**
Includes legible site map(s)? *Part 7.2.6*	Y	N	There was a map located in the plan set that showed basic BMP locations.
➢ 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/NA ➢ 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/NA *Part 7.2.6.1*	Y	N	
➢ 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 *Part 7.2.6.2*	Y	N	
➢ Boundary lines of natural buffers *Parts 7.2.6.3, 2.1.2.1a*	Y	N	
➢ Areas of federally-listed critical habitat for endangered or threatened species *Part 7.2.6.4*	Y	N	
➢ Topography Y/N ➢ Existing vegetative cover Y/N	Y	N	

➢ Drainage pattern of stormwater/authorized non-stormwater flow onto, over, and from site <u>before and after</u> major grading Y/N *Part 7.2.6.5*			
➢ Stormwater and allowable non-stormwater discharge locations Y/N/NA ➢ Locations of storm drain inlets on site and immediate vicinity Y/N/NA ➢ Locations stormwater or allowable non-stormwater will be discharged to surface waters (including wetlands) on or near site Y/N *Part 7.2.6.6*	Y	N	
➢ 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	NA
Construction Site Pollutants			**Notes:**
Includes pollutant-generating activities list and description? *Part 7.2.7.1*	Y	N	NA – No SWPPP available.
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 *Parts 7.2.7.2, 2.3.5.1*	Y	N	NA – No SWPPP available.
Identifies all sources of allowable non-stormwater discharges? *Parts 7.2.8, 1.3.d*	Y	N	NA – No SWPPP available.
If required (surface water wi/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, 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	NA – No SWPPP available.

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	NA – No SWPPP available.
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 *Part 7.2.10.1*	Y	N	NA – No SWPPP available.
Erosion and Sediment Controls			**Notes:**
Minimizes <u>area of disturbance</u>? *Part 2.1.1.1*	Y	N	
Describes erosion and sediment control <u>design</u> requirements? ➢ 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: 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	Y	N	NA – No SWPPP available.

maximum extent practicable, will not be greater than the sediment yield levels 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	NA – No SWPPP available.
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	NA – No SWPPP available.
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	NA – No SWPPP available.
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	Slight trackout was observed on the access road (Louisiana).
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 ➢ 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	Y	N	NA – No SWPPP available.

wind? Y/N *Part 2.1.2.4*			
Minimizes <u>dust</u>? *Part 2.1.2.5*	Y	N	Permittee representative indicated that water is applied as needed, but that dust has not been an issue.
Minimizes disturbance of <u>steep slopes</u>? *Part 2.1.2.6*	Y	N	
Preserves <u>topsoil</u>, unless infeasible? *Part 2.1.2.7*	Y	N	NA

Minimizes <u>soil compaction</u> where final vegetative stabilization or infiltration installed? *Part 2.1.2.8*	Y	N	
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)? *Part 2.1.2.9*	Y	N	
Describes <u>constructed conveyance channel</u> controls (if installed)? *Part 2.1.3.1*	Y	N	NA – No SWPPP available.
Describes <u>sediment basin</u> design (if installed) and maintenance (maintain at least ½ of capacity at all times)? *Part 2.1.3.2*	Y	N	NA – No SWPPP available.
Describes <u>treatment chemical</u> controls (if used)? *Part 2.1.3.3*	Y	N	NA
Includes documentation for use of <u>treatment chemicals</u> (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	Y	N	NA

➢ Description of training that personnel have received or will receive Y/N *Parts 7.2.10.2, 2.1.3.3h*			
Describes <u>dewatering</u> controls (if installed)? *Part 2.1.3.4*	Y	N	NA

Stabilization Requirements			Notes:
Describes compliance with deadlines for vegetative and/or non-vegetative stabilization practices, including exceptions? <u>Deadline to Initiate</u> ➢ Initiates stabilization immediately (no later than end of next work day following earth-disturbing activities permanently/temporarily ceased) Y/N <u>Deadline to Complete</u> ➢ 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	NA – No SWPPP available.
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	NA – No SWPPP available.

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	NA – No SWPPP available.
If using, provides effective non-vegetative cover to stabilize? *Parts 7.2.10.3, 2.2.2.2*	Y	N	NA – not at stabilization point of the project at the time of the inspection.
Pollution Prevention Procedures			**Notes:**
Describes procedures for <u>spill prevention and response</u>? *Parts 7.2.11.1, 2.3.4*	Y	N	NA – No SWPPP available.
Describes procedures for <u>waste management</u>? *Part 7.2.11.2, 2.3.3.3*	Y	N	NA – No SWPPP available.
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/NA ➢ 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/NA *Part 2.3.1*	Y	N	NA – No SWPPP available.
Properly maintains and protects all pollution prevention controls? *Part 2.3.2*	Y	N	Perimeter BMPs were in need of maintenance on the day of this inspection.
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	NA – No SWPPP available. Windblown trash was observed across the south and east sides of the site.
Minimizes discharge/complies with restrictions of <u>fertilizer application</u>? *Part 2.3.5*	Y	N	NA

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	NA – No SWPPP available.
Inspections			**Notes:**
Inspections performed by "qualified" person? *Part 4.1.1*	Y	N	Unknown – no training documentation was kept onsite to show qualifications.
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	Inspections were being conducted weekly at this site.
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	The San Juan River in this reach is impaired for sedimentation/siltation, so in addition to the weekly inspections that are being conducted, additional rain event inspections within 24 hours of a ≥0.25" event should also be occurring.
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	NA
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	Y	N	

➢ All locations stabilization implemented Y/N/NA *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	Inspection documentation generally indicated that the site was in compliance. A walk through during this inspection showed that the perimeter mulch socks were in need of repair and that trash pickup needed to occur. No rain event inspections had been conducted. Rain events were being documented on a separate sheet included with the inspections. Large rain events that would not have been captured by a weekly inspection (within 24 hours of the event) occurred on 9-9-14 (0.27”), 9-28-14 (0.79”), 5-5-15 (0.30”), 5-19-15 (1.01”), 10-6-15 (0.52”), and 11-4-15 (0.35”).
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	According to the permit language at Appendix I, Part I.11.2, signatures on the SWPPP and inspections must be signed by an officer of the company, unless authorization is given to a representative of that person working for the same company (i.e. site superintendent). There was no SWPPP available and no documentation to show that signatures were occurring with delegation from an officer of the company. Wagner Equipment was not signing the inspections.

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	No completed corrective action reports were documented in the SWPPP.
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	
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 submitted for Catamount Constructors was signed by Mr. Ian McIntosh, Project Manager. The NOI must be signed by an officer of the company, as described in Appendix I.11. The NOI must be resubmitted with the proper authorized signature. The inspection reports were being signed by Mr. Jim Summit, Site Superintendent for Catamount Constructors. The permit states in Appendix I.11.2: *Your SWPPP, including changes to your SWPPP, inspection reports, and any other compliance documentation required under this permit, must be signed by a person described in Appendix I, Subsection I.11.1 above or by a duly authorized representative of that person. A person is a duly authorized representative only if:* *I.11.2.1 The authorization is made in writing by a person described in Appendix I, Subsection I.11.1;* *I.11.2.2 The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and* *I.11.2.3 The signed and dated written authorization is included in the SWPPP. A copy must be submitted to EPA, if requested.* EPA has determined that the person making any signature for a CWA document that requires the certification statement in Appendix I must be made by a representative of the company who obtained the NOI for coverage under the permit, and must be delegated in writing by the authorized official.

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)* No project phasing or disturbance minimization appeared to occur on this project.
Buffer compliance:	*(e.g., provide and maintain a 50-foot undisturbed natural buffer)* NA
Perimeter controls:	*(e.g., filter berms, silt fences, temporary diversion dikes)* Installed mulch socks at the perimeter were in need of maintenance or replacement.
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)* There were two access points on the day of this inspection. One was gated off but trackout was evident. The exit point trackout had just been removed prior to this inspection (according to the permittee representative) in order to install paving.
Stockpiled sediment or soil:	*(e.g., berms, dikes, fiber rolls, silt fences, sandbag, gravel bags)* No stockpiles were observed on the day of this inspection.
Minimize dust:	*(e.g., application of water or other dust suppression techniques)* Permittee representatives indicated that water application for dust control occurs when needed. Dust was indicated not to be an issue at this site.
Steep slopes:	*(e.g., standard erosion and sediment control practices, phasing disturbances, stabilization practices)* The site was tiered into an upper and lower portion. The slope between the two elevations had not been stabilized and erosion was occurring.
Preserve topsoil:	*(e.g., stockpiling or transfer of topsoil to other locations)* NA
Soil compaction:	*(e.g., restrict vehicle / equipment use, soil conditioning techniques)* There did not appear to be an effort to reduce traffic across the site, however permittee representative indicated that most of the site will be paved.
Storm drain inlet protection:	*(e.g., fabric filters, sandbags, concrete blocks, gravel barriers)* No storm drain inlets were observed during this inspection other than the inlet (inactive) to the onsite sedimentation pond.
Conveyance channels:	*(e.g., erosion controls, and velocity dissipation check dams, sediment traps, riprap, or grouted riprap at outlets)* The conveyance channel to the pond was stabilized with riprap at the time of this inspection.
Sediment basin:	*(e.g., outlet structures that withdraw from the surface, stabilization, erosion controls, velocity dissipation, kept at least ½ design capacity)* The onsite sediment basin was constructed with an overflow at the surface. The pond was also stabilized with riprap and appeared to have adequate capacity.

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)* NA – Not observed during this inspection.
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)* NA – Not observed during this inspection.
Other erosion and sediment controls or practices:	*(Provide brief description)* NA – Not observed during this inspection.
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)* Although portions of the project are still active, there are areas that could be stabilized. Additionally, according to the permittee representative, construction temporarily ceased for a period of time and there is no documentation or evidence that temporary stabilization occurred during that time.
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?)* Construction started again at this site in March of 2015, and it is unknown how long the site was inactive (no documentation).
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)* According to permittee representatives, drip pans are used when on-site vehicles are fueled. Maintenance occurs offsite when those procedures are needed.
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)* According to permittee representative, this does not occur onsite.
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)* There was no concrete work or work requiring the washing of applicators occurring on the day of this inspection.

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):* Not observed on site.
	Pesticides, herbicides, insecticides, fertilizers, and landscape materials: Not observed on site.
	Diesel fuel, oil, hydraulic fluids, other petroleum products, and other chemicals: Not observed to be stored on site. There were a few drips in the soil that should be picked up ASAP.
	Hazardous or toxic waste (e.g, paints, solvents, petroleum-based products, wood preservatives, additives, curing compounds, acids): Not observed to be stored on site.
	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): Not observed on site.
	Sanitary waste: Port-o-lets were observed on site and appeared to be staked down. According to permittee representative, maintenance occurs at least weekly.
Fertilizer application:	*(e.g., avoids applying before heavy rains, never applies to frozen ground, never applies to conveyance channels with flowing water)* NA – not observed on site and not applicable for this phase of the project.
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 non-stormwater discharges were observed at the time of this inspection.
Evidence of sediment deposition to surface waters or MS4?	*(e.g. significant turbidity observed in a receiving water body)* No sediment deposition was observed at the time of this inspection.