



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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RON CURRY
Secretary
SARAH COTTRELL
Deputy Secretary

September 30, 2010

Mr. Barry Longwell, Construction Manager
Bureau of Reclamation Four Corners Construction Office
2200 Bloomfield Hwy.
Farmington, NM 87401

RE: Construction Storm Water, SIC 1623, NPDES Compliance Evaluation Inspection, Bureau of Reclamation, Navajo Nation Municipal Pipeline, NMU001684, September 13, 2010

Dear Mr. Longwell:

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 discussed 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) and NMED (at above address) regarding modifications and compliance schedules.

Thank you for your employees' cooperation during this inspection. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 222-9587.

Sincerely,

/s/ Sarah Holcomb
Sarah Holcomb
Surface Water Quality Bureau

Cc: Marcia Gail Adams, USEPA (6EN-AS) (by e-mail)
Samuel Tates, USEPA (6EN-AS) (by e-mail)
Carol Peters-Wagnon, USEPA (6EN-AS) (by e-mail)
Diana McDonald, USEPA (6EN-AS) (by e-mail)
Jennifer Ickes, NMED District 1 Manager (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 N 2 5 3 N M U 0 0 1 6 8 4*	11	12	1	0	0	9	1	3	17	18	}	19	S	20	4	
Remarks																
C O N S T R U C T I O N ≥ 1 A C R E																
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) NAVAJO NATION MUNICIPAL PIPELINE, FARMINGTON, SAN JUAN COUNTY; FROM I-25 TAKE HWY 550 WEST TO BLOOMFIELD. TURN WEST ON HWY 64. FOLLOW HWY 64 THROUGH FARMINGTON. TURN WEST TO STAY ON HWY 64. SITE #1 IS NEAR THE INTERSECTION OF HWY 64 AND LA PLATA HWY.	Entry Time /Date 1320 HOURS / 9-13-2010	Permit Effective Date 7-1-2008
	Exit Time/Date 1350 HOURS / 9-13-2010	Permit Expiration Date 6-30-2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) N/A	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. LARRY WALKOVIK, REGIONAL DIRECTOR (801) 524-3600 125 SOUTH SLATE STREET, ROOM 6107, SALT LAKE CITY, UT 84138-1102	GPS: N. 36° 44' 2.48" W. -108° 14' 48.48" SIC:1623	
Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *		

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

1. INSPECTOR ARRIVED ON SITE AT 1320 HOURS ON 9-13-2010. NO ACTIVITY WAS CURRENTLY OCCURRING ON SITE.
 2. SEE ATTACHED REPORT AND CHECKLIST.
 3. THIS REPORT IS BASED ON REVIEW OF FILES MAINTAINED BY THE PERMITTEE AND NMED, ON SITE OBSERVATION BY NMED PERSONNEL, AND VERBAL INFORMATION PROVIDED BY THE FACILITY REPRESENTATIVES.
 4. AN EXIT INTERVIEW TO DISCUSS THE PRELIMINARY FINDINGS OF THIS INSPECTION WAS CONDUCTED WITH MR. DOUG DOCKTOR OF THE BUREAU OF RECLAMATION ON 9-30-2010 OVER THE PHONE. A CALL WAS PLACED TO JOE BAKER WITH SOUTHWEST DAKOTAH FOR AN EXIT INTERVIEW ON 9-30-2010.
 * BOR DID APPLY FOR PERMIT COVERAGE BUT APPARENTLY ONLY ON INDIAN LANDS (#NMR10FS9I).

Name(s) and Signature(s) of Inspector(s) SARAH HOLCOMB /s/ Sarah Holcomb	Agency/Office/Telephone/Fax NMED/SWQB 505-222-9587	Date 9-30-2010
Signature of Management QA Reviewer RICHARD POWELL /s/ Sarah Holcomb	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 9-30-2010

National Database Information		General	
Inspection Type	Compliance Evaluation	Inspector Name	Sarah Holcomb
NPDES ID Number	NMU001684/NMU001685	Telephone	(505) 222-9587
Inspection Date	9-13-2010	Entry Time	1320 hours, 9-13-2010
Inspector Type (circle one)	EPA <input type="checkbox"/> State <input type="checkbox"/> EPA Oversight <input type="checkbox"/>	Exit Time	1350 hours, 9-13-2010
Facility Type (circle one)	Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Residential <input type="checkbox"/> Municipal <input type="checkbox"/>	Signature	/s/ Sarah Holcomb

Facility Location Information					
Name/Location/ Mailing Address	Navajo Nation Municipal Pipeline Along Hwy 64 through Farmington, NM. Mailing: 125 South Slate Street, Salt Lake City, UT 84138				
GPS Coordinates	Latitude	N. 36° 44' 2.48"	Longitude	W. -108° 14' 48.48"	
Receiving Water(s)	San Juan River in segment 20.6.4.401 NMAC				
Disturbed Area	At least 2 acres	Start Date	Jan 2009	Stop Date	Mar 2010?

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Southwest Dakotah – general contractor Bureau of Reclamation - owner	
Facility Contact	Mr. Doug Docktor, Bureau of Reclamation (BOR)	505-324-5006
Authorized Official(s)	Mr. Barry Longwell, Construction Mgr., BOR Mr. Joe Baker, Southwest Dakotah (SD)	505-325-1794 x124 520-663-0970

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

Basic Permit Information			Basic SWPPP Information		
Permit Coverage <i>ESO Element 3 & 4</i>	Y	<input type="checkbox"/> N	SWPPP Prepared & Available <i>ESO Element 5 & 30</i>	<input checked="" type="checkbox"/> Y	N
Permit Type	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory <i>ESO Elements 5 - 31</i>	Y	<input type="checkbox"/> N
Permit notice/sign visibly posted including: copy of NOI, contact name & phone number, location of SWPPP <i>ESO Element 41</i>	Y	<input type="checkbox"/> N	SWPPP Implementation Satisfactory <i>ESO Elements 32 - 48</i>	Y	<input type="checkbox"/> N
NOI Date	N/A		SWPPP Date	11-1-2008	
If applicable, is waiver certification & approval on file?	Y	N	<i>Intentionally left blank</i>		

SWPPP Review (can be completed in office)					
General			Notes:		
Is there a SWPPP? <i>ESO Element 5</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Inspector was able to see a draft copy of the SWPPP. The working copy was not available.		
SWPPP completed prior to NOI submission? <i>ESO Element 6</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Copy of permit language? <i>ESO Element 25</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Is SWPPP consistent with state/tribal/local regulations and permits? <i>ESO Element 26</i>	Y	<input type="checkbox"/> N	No RUSLE calculations were included because each drilling site was only to be 100 ft x 100 ft.		
SWPPP updated to incorporate changes to State, Tribal, Local erosion plans? <i>ESO Element 27</i>	Y	<input type="checkbox"/> N			
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires? <i>ESO Element 28</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Is a copy of the SWPPP on site or made available? <i>ESO Element 30</i>	Y	<input type="checkbox"/> N	As above, working copy was not available. These observations are from seeing the draft available from the stormwater contractor.		
Did all "operators" sign/certify the SWPPP? <i>ESO Element 31</i>	Y	<input type="checkbox"/> N			

<u>Site Description</u>		Notes:	
SWPPP identifies potential sources of pollution? <i>ESO Element 7</i>	<input checked="" type="checkbox"/>	N	Entry/exit points, clearing/grubbing, grading, utilities, structures, landscaping.
SWPPP identifies all operators and their areas of control? <i>ESO Element 8</i>	<input checked="" type="checkbox"/>	N	
Is there a site description? <i>ESO Element 9</i>	<input checked="" type="checkbox"/>	N	Drilling – maintenance related.
Nature/sequence of construction activity? <i>ESO Element 9A - 9B</i>	<input checked="" type="checkbox"/>	N	
Total area of site and total area to be disturbed? <i>ESO Element 9C</i>	<input checked="" type="checkbox"/>	N	3.4 acres disturbed/3.4 acres total.
Is there a general location map? <i>ESO Element 9D</i>	<input checked="" type="checkbox"/>	N	
Is there a site map? <i>ESO Element 9E</i>	<input checked="" type="checkbox"/>	N	
Drainage patterns/outfalls on site map? <i>ESO Element 9F</i>	Y	<input checked="" type="checkbox"/>	
Area of soil disturbance on site map? <i>ESO Element 9F</i>	<input checked="" type="checkbox"/>	N	
Location of major structural controls on site map? <i>ESO Element 9F</i>	Y	<input checked="" type="checkbox"/>	
Location of storm water discharges to a surface water on site map? <i>ESO Element 9F</i>	Y	<input checked="" type="checkbox"/>	
Location of materials or equipment storage on site map (on-site or off-site)? <i>ESO Element 9F</i>	<input checked="" type="checkbox"/>	N	
Location/description industrial activities? <i>ESO Element 9G</i>	Y	N	N/A
Name of Receiving water(s) or MS4 listed?	Y	<input checked="" type="checkbox"/>	<i>Note: Indicate whether receiving water is 303(d) listed.</i> San Juan River in segment 20.6.4.401 NMAC (yes for <i>E. coli</i>)
Does the SWPPP include dates of major grading activities, temporary/permanent construction cessation, and initiation of stabilization practices? <i>ESO Element 14</i>	Y	<input checked="" type="checkbox"/>	
Endangered Species Documentation? <i>ESO Element 23</i>	<input checked="" type="checkbox"/>	N	Information is included but because NOI was never filed, inspector cannot assess whether it was appropriate.

Controls to Reduce Pollutants		Notes:	
Does the SWPPP include a description of all pollution control measures (BMPs) that will be implemented to control pollutants in storm water discharges, including sequence and which operator responsible for implementation? <i>ESO Element 10 A – C</i>	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include a description of interim and permanent <i>stabilization practices</i> (e.g., seeding, mulching, riprap for the site)? <i>ESO Element 11; 12</i>	Y	<input checked="" type="checkbox"/> N	
Does the SWPPP identify the contractor(s) and timing by which <i>stabilization practices</i> will be implemented? <i>ESO Element 13</i>	Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include a description of <i>structural practices</i> (e.g., vehicle track-out, silt fences, sediment traps, storm drain inlet protection) for the site? <i>ESO Element 15</i>	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP identify the contractor(s) and timing by which <i>structural practices</i> will be implemented? <i>ESO Element 10B - 10C</i>	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP identify storm water management measures to address storm water runoff once the construction is completed (e.g., retention ponds, velocity dissipation controls)? <i>ESO Element 16</i>	Y	<input checked="" type="checkbox"/> N	
Does SWPPP describe measures to prevent discharge of dredge/fill materials to waters of the U.S.? Does site have 404 permit? <i>ESO Element 17</i>	Y	<input checked="" type="checkbox"/> N	Unsure if it was needed. A representative from the City of Farmington said the pipeline went under the river.
Does SWPPP describe measures to minimize off-site vehicle tracking and generation of dust? <i>ESO Element 18</i>	<input checked="" type="checkbox"/> Y	N	
Does SWPPP describe controls for pollutants from storage of construction or waste materials? <i>ESO Element 19</i>	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP describe controls for pollutants from non-construction activities? <i>ESO Element 20</i>	Y	N	N/A
Does SWPPP identify allowable non-storm water discharges? <i>ESO Element 21</i>	Y	<input checked="" type="checkbox"/> N	Entire list from the permit is included with no description of BMPs needed or assessment of what could actually occur on site.

Controls to Reduce Pollutants (cont'd)		Notes:
Does SWPPP ensure implementation of pollution prevention measures for non-storm water discharges? <i>ESO Element 22</i>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	SWPPP does not discuss BMPs needed for each potential non-stormwater discharge.
Is SWPPP revised when BMPs added/modified within 7 days after inspection reveals problems? <i>ESO Element 29</i>	Y <input type="checkbox"/> N <input type="checkbox"/>	There is no documentation to show that BMPs are added or modified.

Inspections		Notes:
Inspections performed once every 14 days and within 24 hours of a rain event greater 0.5"? <i>ESO Element 32</i>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Allegedly the project went on 3-4 months after inspections stopped being documented.
Inspections performed by qualified personnel? <i>ESO Element 33</i>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	No qualifications were listed in the template SWPPP for Rodger Barton.
All disturbed areas and/or used for storage and exposed to rain inspected? <i>ESO Element 34</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
All pollution control measures inspected to ensure proper operation? <i>ESO Element 35</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Measures were inspected, but never repaired/reevaluated by the contractor.
All discharge locations inspected if accessible, or if not accessible, are nearby downstream locations inspected? <i>ESO Element 36; 37</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Entrance/exit inspected for off-site tracking? <i>ESO Element 38</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Inspection report contains all required items and certified? <i>ESO Element 39; 40</i>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	The inspection reports were signed digitally. There was no authorization letter for Rodger to sign inspection reports.

Notes on SWPPP Review

Site Description:

This project concerns the installation of a municipal water line to serve the Navajo Nation. SWQB had received a complaint regarding this project in December 2009 but it was thought the entire project was on Indian land. SWQB received another complaint regarding a city owned project that happened to be on the same piece of property. According to facility representatives, there were 6 drilling sites in total, and the site in question that triggered both complaints is located on city land. This inspection report only concerns that particular piece of property as a part of a larger common plan of development.

It appears that although a SWPPP was prepared for the project, the NOIs for both the Bureau of Reclamation as the owner, and for Southwest Dakotah Incorporated as the general contractor, were never filed. Neither entity had permit coverage for the entire duration of the project.

The site generated complaints because it was never stabilized. The city of Farmington had initiated a smaller water line project (only installing about 400' of water line, in a narrow trench) and the reporter thought that they had disturbed the entire area.

In reviewing site documentation from the SWPPP contractor, the inspector concentrated on the inspection reports, as those seemed most accurate. The reports were signed digitally, which cannot occur as the construction inspection reports are not included under EPA's CROMERR (Cross Media Electronic Reporting Rule). Until they are, reports must be signed at the time of the inspection in accordance with Appendix G.11.A of the permit.

It appears that inspections were conducted as required (every 14 days and within 24 hours of a 0.5" rain event), however inspections were abruptly stopped in December 2009. Allegedly the project continued for 3-4 months after that with no documented inspections.

The SWPPP contractor included pictures in all of his reports. The pictures document numerous problems that occurred during the project, including leaks and spills of materials that were not promptly cleaned up with BMPs being reassessed. There were numerous incidences of materials (including Super Gel-X, and Soda Ash, both of which are designated as being hazardous on the product packaging) being stored outside, exposed to the elements. The most serious issue documented in the inspection reports for this project is that drilling flushings were being pumped directly into the San Juan River.

As the inspector was not able to see the working copy of the SWPPP for the project, it must be assumed that the SWPPP was never signed and was never implemented on site. It appears that despite the best efforts of the SWPPP contractor to alert the BoR and Southwest Dakotah to issues that needed immediate attention, serious issues kept occurring without any documented fixes or cleanup of material spills.

SWPPP Implementation <i>(complete in field)</i>	
<u>Stabilization Practices</u>	
<p>List and describe stabilization practices <i>ESO Element 43, 48</i></p>	<p><i>(e.g., seeding, mulching, geotextiles, sod stabilization)</i></p> <p>None were observed on site.</p>
<p>Are stabilization measures initiated no more than 14 days after temporary or permanent construction cessation? <i>ESO Element 46</i></p>	<p><i>(e.g., indicate “yes” or “no”; if “yes”, how long without stabilization measures?)</i></p> <p>No.</p>

<u>Structural Practices</u>	
<p>List and describe structural controls <i>ESO Element 42, 43, 47</i></p>	<p><i>(e.g., silt fences, hay bales, storm drain inlet protection, sedimentation pond, rip rap, check dam, diversion structure, off-site vehicle track-out)</i></p> <p>1. None were in place by the time the inspector was able to make it out to this site.</p>

<u>Non-Structural Practices</u>	
<p>Street Cleaning <i>ESO Element 44</i></p>	<p><i>(e.g., describe measures taken to remove offsite accumulation of sediment)</i></p> <p>Unknown.</p>
<p>Good Housekeeping & Waste Disposal Practices <i>ESO Element 45</i></p>	<p><i>(e.g., describe measures taken to prevent litter and debris from becoming a pollutant source)</i></p> <p>Unknown.</p>

NPDES Industrial Storm Water Worksheet (Construction)

<u>Non-Structural Practices</u>	
<p>Equipment Wash/ Maintenance Area <i>ESO Elements 43</i></p>	<p><i>(provide brief description)</i></p> <p>N/A</p>
<p>Concrete Washout Areas <i>ESO Elements 43</i></p>	<p><i>(provide brief description)</i></p> <p>Unknown.</p>
<u>Miscellaneous</u>	
<p>Evidence of Sediment Deposition to Surface Waters <i>*ESO Eligibility - if "yes," site not eligible for ESO</i></p>	<p><i>(e.g., significant turbidity observed in a receiving water body)</i></p> <p>Yes – please see attached on site inspection report from the SWPPP contractor.</p>
<p>Pollution prevention measures for non- storm water discharges? <i>*ESO Eligibility - If evidence of non- allowable non-storm water discharges, site not eligible for ESO</i></p>	<p><i>(provide brief description and determine whether/if non-storm water discharges allowable)</i></p> <p>None were documented and there were no non-storm water discharges occurring at the time of this inspection. However, please see above documentation.</p>
<p>Has implementation of additional/modified BMPs been completed before next anticipated storm event? <i>ESO Element 43.C.1</i></p>	<p><i>(provide brief description)</i></p> <p>No, it does not appear from the documentation available to the NMED inspector that BMPs had been reevaluated during the course of this project.</p>

SWPPP Inspectors LLC: Stormwater Construction Site Inspection Report

General Information			
Project Name	Drill Site – Navajo Utility Line	NOI & Site Sign Posted: N	
NPDES Tracking No.	NMR100000	Location: Job Site	Farmington to Shiprock NM
Date of Inspection	3-26-2009	Start/End Time	10:30 AM 11:15 AM
Inspector's Name(s) Credentials/Qualifications	Rodger Barton, see certificate in SWPPP BS, MBA, LIC INS ADJ.		
Inspector's Title(s)	SWPPP Instructor, business owner,		
Inspector's Contact Information	505.818.7450 , rodger@swpppcompliance.com		
Describe present phase of construction & disturbed areas	Site 1: <ul style="list-style-type: none"> • Drilling at site 1 is complete. 		
Type of Inspection <input checked="" type="checkbox"/> Regular (14 Day) <input type="checkbox"/> Storm (Rain, Snow)			
Weather Information			
Has it rained since the last inspection?		Rain is being tracked on site. Not by an Internet site.	
<input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, provide: Storm Start Date & Time: Storm Duration (hrs): Approximate Rainfall (in):			
Weather at time of this inspection? Cloudy 53 degrees		Weather since the time of the last inspection? Cloudy / Cold	
Do you suspect that discharges may have occurred since the last inspection? Locations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Are there any discharges at the time of inspection? Locations of sediment or pollutant discharges? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

BMPs – Maintenance, Upgrade, Increased Measures, Repair, Failure, Corrective Actions

BMP ID	BMP Description	BMP Installed and Operating Properly?	Corrective Action Needed: Corrective Action Log: Photos & notes are acceptable:	Date for corrective action/responsible person
1	Drive Pad / Rip Rap / Entrance & Exit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	RIP RAP / Cobble should be brought to the site entrance. Thin layer is on site however it should be refreshed due to moisture from recent snow storms. Rock has sunk into the ground.	Please update.
2	Concrete Washout	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	NA, concrete will be poured at a later date. Concrete has not been poured as of today.	NA RB
3	Dumpster	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	1 small dumpster has been on site with hard plastic covers/panel lids.	Please update.
4	Port-A-Potty / Toilet	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Port O Let is on site. Please stake to the ground.	Please update.

	BMP Description	BMP Installed and Operating Properly?	Corrective Action Needed: Corrective Action Log: Photos & notes are acceptable:	Date for corrective action/responsible person
5	Silt Fence / Wattles	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Operator opted to not install either BMP type referenced.	Please update.
6	Storage – Materials	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Storage area has not been designated. 1 trailer is on site.	Please update.
7	SWPPP Revisions, Modifications, CAL	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	SWPPP & inspections are being managed on and off site. On going activity.	On going activity.
8	Trash & Sweeping	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please continue to pick up trash & material debris as needed.	NA, on going activity. RB
9		<input type="checkbox"/> Yes <input type="checkbox"/> No		
10		<input type="checkbox"/> Yes <input type="checkbox"/> No		

Overall Site Issues

	BMP/activity	Implemented?	Maintained?	Corrective Action	Date for corrective action/responsible person
1	Are all slopes and disturbed areas not actively being worked properly stabilized?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	No action necessary. Slope facing the river should be protected with wattle or silt fence, or loose hay.	NA RB
2	Are natural resource areas (e.g., streams, wetlands, mature trees, etc.) protected with barriers or similar BMPs?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	None are near the site. Slope facing the river should be protected with wattle or silt fence Site has not been protected with BMPs.	NA RB
3	Are perimeter controls and sediment barriers adequately installed (keyed into substrate) and maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	Operator opted to not installed perimeter controls.	NA RB
4	Are discharge points and receiving waters free of sediment deposits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	All clear.	Discharge points are being inspected. 3-26-2009
5	Are storm drain inlets properly protected?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	NA, NONE are presently installed near the site.	NA RB
6	Is there evidence of sediment being tracked into the street?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Yes, new layer of Cobble or RIP RAP should be brought on site.	Please update.

	BMP/activity	Implemented?	Maintained?	Corrective Action	Date for corrective action/responsible person
7	Is trash/litter from work areas collected and placed in covered dumpsters?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Dumpster should be brought on site.	Please update.
8	Are washout facilities (e.g., paint, stucco, concrete) available, clearly marked, and maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	None are on site.	Please update.
9	Are vehicle and equipment fueling, cleaning, and maintenance areas free of spills, leaks, or any other deleterious material?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Vehicle fueling & cleaning are not being presently conducted. Secondary containment bins which are also lined are being built and installed in the storage trailer. This is for small gas tanks and oil containers. The gas and oil are used for small equipment such as chainsaws or other small motorized equipment. The storage trailer is also being protected with wattles.</p> <p>Please secure and store all containers with oil, gasoline, etc. in the storage trailers and the end of each work day.</p>	<p>On going activity, no leaks, new bins are in place to collect any drips or fluid. Small gas and oil containers are being checked on a daily basis and will be replaced if leaks develop. *** In progress. 1 secondary container is in use. Advised to build 2 more to store other chemicals in the trailer. All contractor and subcontractor vehicles were inspected for leaks. None at the present time. All motorized equipment was check for leaks. None.</p>
10	Are materials that are potential stormwater contaminants stored inside or under cover?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	Storage trailer is on site. Wattles should be installed around the perimeter of the trailer.	Please update.
11	Are non-stormwater discharges (e.g., wash water, dewatering) properly controlled?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Activities are not taking place.	NA RB
12	Rain Gauge	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	Please install a rain	Please update.



	BMP/activity	Implemented?	Maintained?	Corrective Action	Date for corrective action/responsible person
				gauge.	
13	Retaining Walls	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	None are scheduled as part of the SWPPP.	NA RB

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Signature: _____

Date: 3 . 26 . 2009



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SWPPP Inspectors LLC: Stormwater Construction Site Inspection Report

General Information			
Project Name	Drill Site – Navajo Utility Line	NOI & Site Sign Posted: N	
NPDES Tracking No.	NMR100000	Location: Job Site	Farmington to Shiprock NM
Date of Inspection	3-26-2009	Start/End Time	10:30 AM 11:15 AM
Inspector's Name(s) Credentials/Qualifications	Rodger Barton, see certificate in SWPPP BS, MBA, LIC INS ADJ.		
Inspector's Title(s)	SWPPP Instructor, business owner,		
Inspector's Contact Information	505.818.7450 , rodger@swpppcompliance.com		
Describe present phase of construction & disturbed areas	Site 1: • Drilling at site 1 is complete.		
Type of Inspection <input checked="" type="checkbox"/> Regular (14 Day) <input type="checkbox"/> Storm (Rain, Snow)			
Weather Information			
Has it rained since the last inspection?		Rain is being tracked on site. Not by an Internet site.	
<input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, provide: Storm Start Date & Time: Storm Duration (hrs): Approximate Rainfall (in):			
Weather at time of this inspection? Cloudy 53 degrees		Weather since the time of the last inspection? Cloudy / Cold	
Do you suspect that discharges may have occurred since the last inspection? Locations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Are there any discharges at the time of inspection? Locations of sediment or pollutant discharges? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

BMPs – Maintenance, Upgrade, Increased Measures, Repair, Failure, Corrective Actions

#	BMP Description	BMP Installed and Operating Properly?	Corrective Action Needed: Corrective Action Log: Photos & notes are acceptable:	Date for corrective action/responsible person
1	Drive Pad / Rip Rap / Entrance & Exit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	RIP RAP / Cobble should be brought to the site entrance. Thin layer is on site however it should be refreshed due to moisture from recent snow storms. Rock has sunk into the ground.	Please update.
2	Concrete Washout	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	NA, concrete will be poured at a later date. Concrete has not been poured as of today.	NA RB
3	Dumpster	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	1 small dumpster has been on site with hard plastic covers/panel lids.	Please update.
4	Port-A-Potty / Toilet	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Port O Let is on site. Please stake to the ground.	Please update.

	BMP Description	BMP Installed and Operating Properly?	Corrective Action Needed: Corrective Action Log: Photos & notes are acceptable:	Date for corrective action/responsible person
5	Silt Fence / Wattles	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Operator opted to not install either BMP type referenced.	Please update.
6	Storage – Materials	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Storage area has not been designated. 1 trailer is on site.	Please update.
7	SWPPP Revisions, Modifications, CAL	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	SWPPP & inspections are being managed on and off site. On going activity.	On going activity.
8	Trash & Sweeping	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please continue to pick up trash & material debris as needed.	NA, on going activity. RB
9		<input type="checkbox"/> Yes <input type="checkbox"/> No		
10		<input type="checkbox"/> Yes <input type="checkbox"/> No		

Overall Site Issues

	BMP/activity	Implemented?	Maintained?	Corrective Action	Date for corrective action/responsible person
1	Are all slopes and disturbed areas not actively being worked properly stabilized?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	No action necessary. Slope facing the river should be protected with wattle or silt fence, or loose hay.	NA RB
2	Are natural resource areas (e.g., streams, wetlands, mature trees, etc.) protected with barriers or similar BMPs?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	None are near the site. Slope facing the river should be protected with wattle or silt fence Site has not been protected with BMPs.	NA RB
3	Are perimeter controls and sediment barriers adequately installed (keyed into substrate) and maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	Operator opted to not installed perimeter controls.	NA RB
4	Are discharge points and receiving waters free of sediment deposits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	All clear.	Discharge points are being inspected. 3-26-2009
5	Are storm drain inlets properly protected?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	NA, NONE are presently installed near the site.	NA RB
6	Is there evidence of sediment being tracked into the street?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Yes, new layer of Cobble or RIP RAP should be brought on site.	Please update.

	BMP/activity	Implemented?	Maintained?	Corrective Action	Date for corrective action/responsible person
7	Is trash/litter from work areas collected and placed in covered dumpsters?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Dumpster should be brought on site.	Please update.
8	Are washout facilities (e.g., paint, stucco, concrete) available, clearly marked, and maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	None are on site.	Please update.
9	Are vehicle and equipment fueling, cleaning, and maintenance areas free of spills, leaks, or any other deleterious material?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Vehicle fueling & cleaning are not being presently conducted. Secondary containment bins which are also lined are being built and installed in the storage trailer. This is for small gas tanks and oil containers. The gas and oil are used for small equipment such as chainsaws or other small motorized equipment. The storage trailer is also being protected with wattles.</p> <p>Please secure and store all containers with oil, gasoline, etc. in the storage trailers and the end of each work day.</p>	<p>On going activity, no leaks, new bins are in place to collect any drips or fluid. Small gas and oil containers are being checked on a daily basis and will be replaced if leaks develop. *** In progress. 1 secondary container is in use. Advised to build 2 more to store other chemicals in the trailer. All contractor and subcontractor vehicles were inspected for leaks. None at the present time. All motorized equipment was check for leaks. None.</p>
10	Are materials that are potential stormwater contaminants stored inside or under cover?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	Storage trailer is on site. Wattles should be installed around the perimeter of the trailer.	Please update.
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