

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 3, 2014

Mr. Russell Casados, Owner
Russell Sand & Gravel Co. Inc.
County Road 340
P.O. Box 296
Los Ojos, New Mexico 87551

**Re: Russell Sand & Gravel Co., Minor, Unpermitted Discharge, SIC 1442, NPDES
Reconnaissance Inspection, NPDES# NMU001831, August 7, 2014**

Dear Mr. Casados:

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.

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. If you have comments on or concerns with the basis for the finding 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)
1445 Ross Avenue, Suite 120
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 Daniel Valenta at (505) 827-2575 or daniel.valenta@state.nm.us.

Russell Sand & Gravel Company
September 3, 2014
Page 2

Sincerely,

/s/Bruce J. Yurdin

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

Cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters, USEPA (6EN-WM) by e-mail
Brent Larsen, USEPA (6WQ) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
NMED District II, Robert Italiano by e-mail



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 <input type="checkbox"/> N <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/> 3 <input type="checkbox"/> N <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> 0 <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 8 <input type="checkbox"/> 3 <input type="checkbox"/> 1 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 1 <input type="checkbox"/> 4 <input type="checkbox"/> 0 <input type="checkbox"/> 8 <input type="checkbox"/> 0 <input type="checkbox"/> 7 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> R <input type="checkbox"/> 19 <input type="checkbox"/> S <input type="checkbox"/> 20 <input type="checkbox"/> 2 <input type="checkbox"/>					
Remarks					
<input type="checkbox"/> S <input type="checkbox"/> A <input type="checkbox"/> N <input type="checkbox"/> D <input type="checkbox"/> & <input type="checkbox"/> G <input type="checkbox"/> R <input type="checkbox"/> A <input type="checkbox"/> V <input type="checkbox"/> E <input type="checkbox"/> L <input type="checkbox"/> F <input type="checkbox"/> A <input type="checkbox"/> C <input type="checkbox"/> I <input type="checkbox"/> L <input type="checkbox"/> I <input type="checkbox"/> T <input type="checkbox"/> Y <input type="checkbox"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 69	70 <input type="checkbox"/> 1 <input type="checkbox"/>	71 <input type="checkbox"/> N <input type="checkbox"/>	72 <input type="checkbox"/> N <input type="checkbox"/>	73 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	74 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 75 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 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) Russell Sand & Gravel, 150 CR 340, Los Ojos, New Mexico, 87551 Rio Arriba County	Entry Time /Date 1300/ Aug 7, 2014	Permit Effective Date No Permit
	Exit Time/Date 1357/Aug 7, 2014	Permit Expiration Date No Permit
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Russell Casados/Owner/575-588-7933 fax 575-588-9225	Other Facility Data LAT 36° 43' 03.37" N LONG 106° 35' 22.96" W SIC 1442	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Russell Casados, P.O. Box 296, Los Ojos, New Mexico 87551 /Owner/ President/575-588-7933 fax 575-588-9225	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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

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

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

1. Reconnaissance inspection to review operating procedures.

Name(s) and Signature(s) of Inspector(s) DANIEL VALENTA /s/Daniel Valenta	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2575	Date 9/3/2014
Signature of Management QA Reviewer SARAH HOLCOMB /s/Sarah Holcomb	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 9/3/2014

Reconnaissance Inspection
Russell Sand & Gravel Company, Inc.
NPDES Permit No. NMU001831
August 7, 2014

Introduction

On August 7, 2014 a Reconnaissance Inspection was conducted at the Russell Sand & Gravel Facility (Standard Industrial Classification 1442) located near Los Ojos, New Mexico by Daniel Valenta of the NMED. The purpose of this inspection was to document the facility's status regarding process wastewater under regulation **40 Code of Federal Regulations Part 122**. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative finding section of the report. This inspection was initiated by a complaint from a citizen. The facility was previously inspected on December 6, 2012, see attached.

Russell Sand & Gravel is a New Mexico Corporation, a family-owned and operated company since 1994 whose main office is in Los Ojos, located in the Chama Valley and Rio Arriba County in Northern New Mexico. Their second location is in Las Cruces, located in Dona Ana County in Southern New Mexico. They specialize in the production of sand and gravel, concrete and asphalt. Their services include custom crushing, road construction, driveway construction, site development, earthwork, excavation, curb and gutter, bridge construction, and paving. At the Rio Chama site, approximately 50 acres, the facility has a hot asphalt plant, rock crusher, cement mixer, and processes/stores construction sand and gravel.

Mr. Casados described the fixed sand wash process as follows; sand has to be washed before it can be used in concrete; it is processed and then stored until needed. Irrigation water is used in the processing of the sand. The water and fines, carried by the water is discharged into a large ditch which flows into a pond. The pond discharges to a channel filtered by a rock check dam. This co-mingles with irrigation water which is channeled around the site to discharge to a heavily vegetated area next to the Rio Chama. Only when there is a need for this type of material is the machinery used.

This process water discharges from the facility into the Rio Chama in Segment 20.6.4.119 of the Rio Grande Basin. Segment 20.6.4.119 designated uses are: domestic water supply, fish culture, high quality coldwater aquatic life, irrigation, livestock watering, wildlife habitat and primary contact; and public water supply on the Rio Brazos and Rio Chama.

This report is based on on-site observations by NMED personnel and verbal information provided by the facility's representative. Arriving at the site at approximately 1300 hours, the inspector made introductions, presented his credentials and discussed the purpose of the inspection with Mr. Russell Casados. A brief exit interview to discuss the findings of this inspection was conducted at the facility at 1357 hours.

Federal Clean Water Act and NPDES Requirements

Section 301 of the Federal Clean Water Act states: *“Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this Act, the discharge of any pollutant by any person shall be unlawful.”*

Reconnaissance Inspection
Russell Sand & Gravel Company, Inc.
NPDES Permit No. NMU001831
August 7, 2014

40 CFR Part 122.1 (b) Scope of the NPDES permit requirement states (1), *“The NPDES program requires permits for the discharge of ‘pollutants’ from any ‘point source’ into ‘waters of the United States.’ The terms ‘pollutant’, ‘point source’ and ‘waters of the United States’ are defined at § 122.2.”*

Per 40 CFR Part 122.21(a) Duty to apply states (1) states, *“Any person who discharges or proposes to discharge pollutants...must submit a complete application to the Director in accordance with this section and part 124.”*

Findings

This facility does not have NPDES permit coverage for the discharge of process water from the fixed screening and washing mechanism, see the following photographs. This is a repeat finding of the December 6, 2012 inspection, see attached.

The USEPA Region 6 NPDES Permit Coordinator can be contacted for more information on how to submit an application for discharges of pollutants under the federal Clean Water Act. Process waters are not eligible for coverage under the NPDES Multi-Sector General Permit and require the facility to submit an application for individual coverage under the NPDES program. Discharges of these types of non-stormwater or process wastewater would not be allowable under the existing NPDES General Permit.

NMED/SWQB

Site Overview

City/County: Outside of Los Ojos, New Mexico/ Rio Arriba County		
Location: Russell Sand & Gravel Company, 150 CR 340, Los Ojos, New Mexico, 87551		
Subject: Overview of process to contain and release process water.		



1. Sand wash area discharges to ditch leading to a small pond.
2. Ditch discharges to pond.
3. Pond has a exit breach at far side to allow water out.
4. Rock check dam slows and filters water.
5. Water comingles with irrigation ditch water and exits site to a heavily vegetated side of the river.

**NMED/SWQB
Official Photograph Log**

Photo # 1

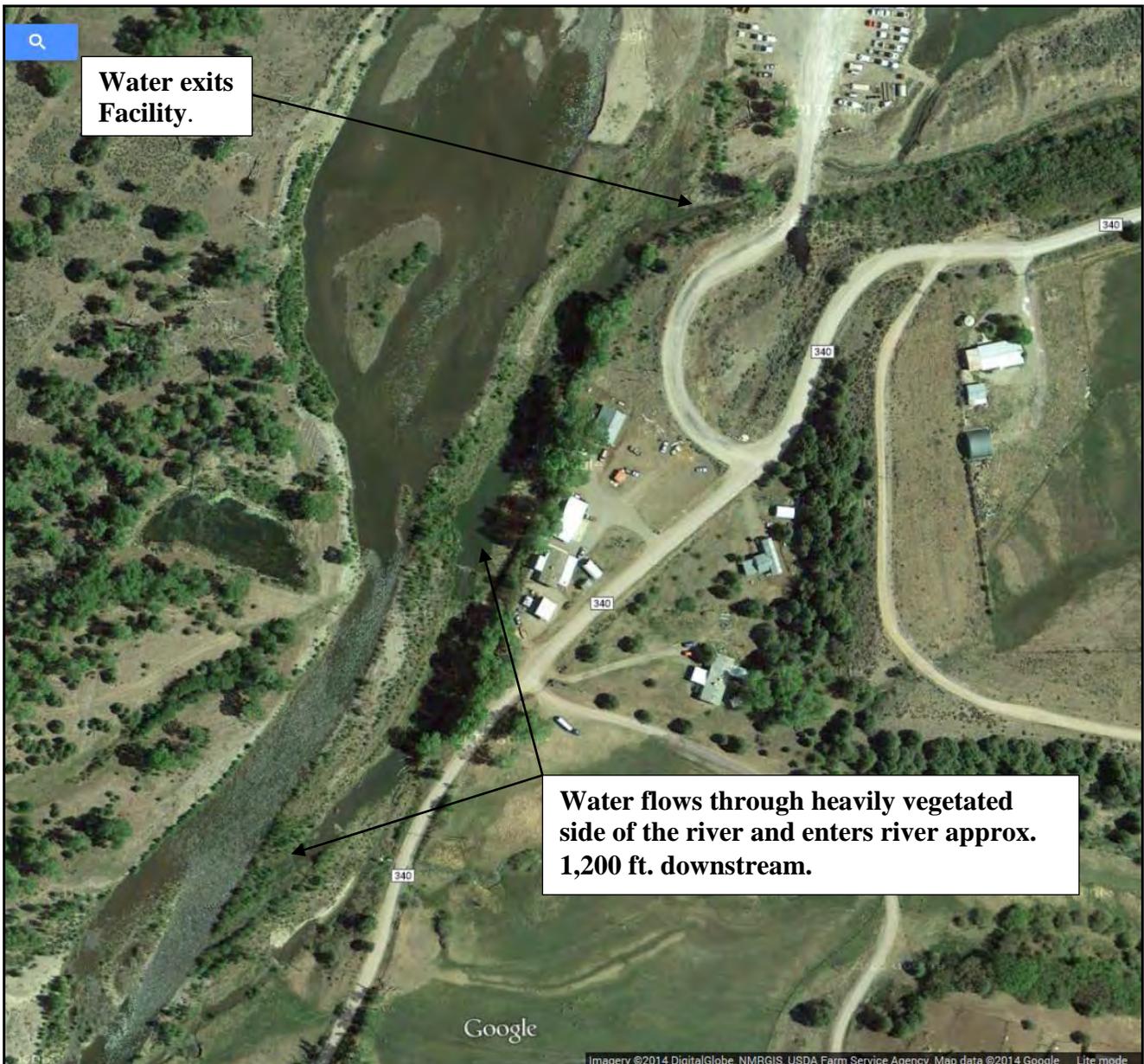
Photographer: Daniel Valenta	Date: August 7, 2014	Time: 1237 hours
City/County: Outside of Los Ojos, New Mexico/ Rio Arriba County		
Location: Russell Sand & Gravel Company, 150 CR 340, Los Ojos, New Mexico, 87551		
Subject: Overview of working area of Russell Sand & Gravel Company Los Ojos site, facing north.		



NMED/SWQB

Site Overview

City/County: Outside of Los Ojos, New Mexico/ Rio Arriba County		
Location: Russell Sand & Gravel, 150 CR 340, Los Ojos, New Mexico, 87551		
Subject: Overview of outfall at Russell Sand & Gravel facility.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: August 7, 2014	Time: 1316 hours
City/County: Outside of Los Ojos, New Mexico/ Rio Arriba County		
Location: Russell Sand & Gravel Company, 150 CR 340, Los Ojos, New Mexico, 87551		
Subject: Sand wash area, discharged ditch has been cleaned and enlarged, facing west.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: August 7, 2014	Time: 1313 hours
City/County: Outside of Los Ojos, New Mexico/ Rio Arriba County		
Location: Russell Sand & Gravel Company, 150 CR 340, Los Ojos, New Mexico, 87551		
Subject: Discharge ditch flows to pond, facing northeast.		



**NMED/SWQB
Official Photograph Log**

Photo # 4

Photographer: Daniel Valenta	Date: August 7, 2014	Time: 1318 hours
City/County: Outside of Los Ojos, New Mexico/ Rio Arriba County		
Location: Russell Sand & Gravel Company, 150 CR 340, Los Ojos, New Mexico, 87551		
Subject: Water flows from settling pond through a breach in the berm, facing southeast.		



**NMED/SWQB
Official Photograph Log**

Photo # 5

Photographer: Daniel Valenta	Date: August 7, 2014	Time: 1327 hours
City/County: Outside of Los Ojos, New Mexico/ Rio Arriba County		
Location: Russell Sand & Gravel Company, 150 CR 340, Los Ojos, New Mexico, 87551		
Subject: Rock check dam retains and slows water from settling ponds before it comingles with water from irrigation channel, facing northeast.		



**NMED/SWQB
Official Photograph Log**

Photo # 6

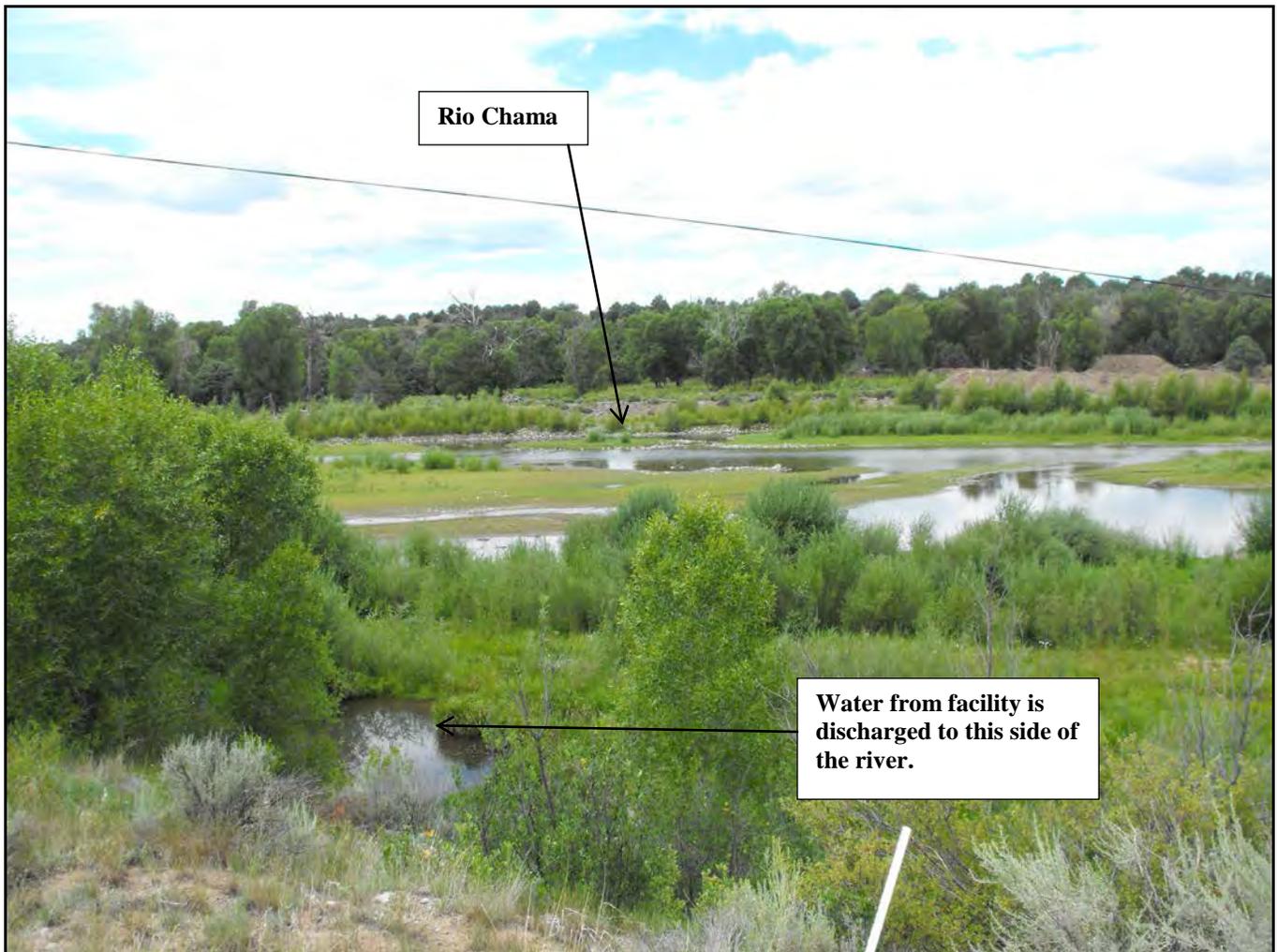
Photographer: Daniel Valenta	Date: August 7, 2014	Time: 1354 hours
City/County: Outside of Los Ojos, New Mexico/ Rio Arriba County		
Location: Russell Sand & Gravel Company, 150 CR 340, Los Ojos, New Mexico, 87551		
Subject: Facility discharges process water and irrigation water to the Rio Chama in a heavily vegetated area, facing north.		



**NMED/SWQB
Official Photograph Log**

Photo # 7

Photographer: Daniel Valenta	Date: August 7, 2014	Time: 1353 hours
City/County: Outside of Los Ojos, New Mexico/ Rio Arriba County		
Location: Russell Sand & Gravel Company, 150 CR 340, Los Ojos, New Mexico, 87551		
Subject: Facility discharges process water and irrigation water to the Rio Chama in a heavily vegetated area, facing west.		





**NEW MEXICO
ENVIRONMENT DEPARTMENT**



Surface Water Quality Bureau

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**Harold Runnels Building, N2050
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**

DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

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

Certified Mail - Return Receipt Requested

January 2, 2013

Mr. Russell Casados, Owner
Russell Sand & Gravel Co. Inc.
P.O. Box 13124
Las Cruces, New Mexico 88013

Re: Minor Non-Municipal, SIC 1442, NPDES Compliance Evaluation Inspection, Russell Sand & Gravel, Company, Inc., Permit NMU001831, December 6, 2012

Dear Mrs. Casados,

Enclosed, please find a copy of the report 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.

Problems noted during this inspection are discussed in the Finding section of the 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 the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Allied Bank Tower
1445 Ross Avenue
Dallas, Texas 75202-2733

Program Manager
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 me at (505) 827-2575 or daniel.valenta@state.nm.us.

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Environmental Scientist/Specialist
Surface Water Quality Bureau

Cc: Hannah Branning, EPA (6EN) by e-mail
Carol Peters-Wagnon, EPA (6EN-WM) by e-mail
Diana McDonald, EPA (6EN-WM) by e-mail
Larry Giglio, EPA (6WQ-PP) by e-mail
Rashida Bowlin, EPA (6EN) by e-mail
Robert Italiano, NMED District II (Santa Fe) by e-mail



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 U 0 0 1 8 3 1 11 12 1 2 1 2 0 6 17 18 C 19 S 20 2					
Remarks					
S A N D & G R A V E L F A C I L I T Y					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 1	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) Russell Sand & Gravel, 150 CR 340, Los Ojos, New Mexico, 87551 Rio Arriba County	Entry Time /Date 1020/ 12-6-2012	Permit Effective Date No Permit
	Exit Time/Date 1427/12-6-2012	Permit Expiration Date No Permit
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Russell Casados/Owner President/575-588-7933 fax 575-588-9225	Other Facility Data LAT 36° 43' 03.37" N LONG 106° 35' 22.96" W SIC 1442	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Russell Casados, P.O. Box 13124, Las Cruces, New Mexico 88013 /Owner/ President/575-588-7933 fax 575-588-9225	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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

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

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

- Facility does not have permit coverage for process water discharges to the Rio Chama.

Name(s) and Signature(s) of Inspector(s) DANIEL VALENTA /s/Daniel Valenta	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2575	Date 1/2/2013
Signature of Management QA Reviewer RICHARD E. POWELL /s/Richard Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-0418	Date 1/2/2013

**Compliance Evaluation Inspection
Russell Sand & Gravel Company, Inc.
NPDES Permit No. NMU001831
December 6, 2012**

Introduction

On December 6, 2012 a Compliance Evaluation Inspection was conducted at the Russell Sand & Gravel Facility (Standard Industrial Classification 1442) located near Los Ojos, New Mexico by Daniel Valenta accompanied Sandra Gabaldon and Chuck Dentino of the NMED. The purpose of this inspection was to document both the facility's status regarding the process wastewater and storm water program under regulation **40 Code of Federal Regulations Part 122**. Finding of the inspection are detailed on the attached EPA form 3560-3 and in the narrative finding section of the report. A report that documents the NPDES stormwater inspection finding will be sent under a separate cover.

Russell Sand & Gravel is a New Mexico Corporation, a family-owned and operated company since 1994 whose main office is in Los Ojos, located in the Chama Valley and Rio Arriba County in Northern New Mexico. Their second location is in Las Cruces, located in Dona Ana County in Southern New Mexico. They specialize in the production of sand and gravel, concrete and asphalt. Their services include custom crushing, road construction, driveway construction, site development, earthwork, excavation, curb and gutter, bridge construction and paving. At the Rio Chama site, approximately 50 acres, the facility has a hot asphalt plant, rock crusher, processes and stores construction sand and gravel and has 4 to 5 employees.

Mr. Casados described the fixed sand wash process as follows; sand has to be washed before it can be used in concrete; it is processed and then stored until needed. Irrigation water is used in the processing of sand. The water and fines, carried by the water is discharged into a ditch which flows into a pond. The pond discharges to a channel which leads to the river. The discharge first flow alongside the river in a side channel then enters the stream. The operator said the sand washing area only needs to operate 2 to 3 times a year and only for 4 to 5 hours at a time. The operator said the activity is stopped when he can see the silt discoloration in the retention pond spreading across the pond.

This process water may discharge from the facility into the Rio Chama in Segment 20.6.4.119 of the Rio Grande Basin. Segment 20.6.4.119 designated uses are: domestic water supply, fish culture, high quality coldwater aquatic life, irrigation, livestock watering, wildlife habitat and primary contact; and public water supply on the Rio Brazos and Rio Chama.

This report is based on on-site observation by NMED personnel and verbal information provided by the facility's representative. Arriving at the site at approximately 1020 hours, the inspector made introductions, presented his credentials and discussed the purpose of the inspection with Mr. Russell Casados. A brief exit interview to discuss the findings of this inspection was conducted at the facility at 1427 hours.

Federal Clean Water Act and NPDES Requirements

Section 301 of the Federal Clean Water Act states: *“Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this Act, the discharge of any pollutant by any person shall be unlawful.”*

**Compliance Evaluation Inspection
Russell Sand & Gravel Company, Inc.
NPDES Permit No. NMU001831
December 6, 2012**

40 CFR Part 122.1 (b) Scope of the NPDES permit requirement states (1) states, *“The NPDES program requires permits for the discharge of ‘pollutants’ from any ‘point source’ into ‘waters of the United States.’ The terms ‘pollutant’, ‘point source’ and ‘waters of the United States’ are defined at § 122.2.”*

Per 40 CFR Part 122.21(a) Duty to apply states (1) states, *“Any person who discharges or proposes to discharge pollutants...must submit a complete application to the Director in accordance with this section and part 124.”*

Findings

This facility does not have NPDES permit coverage for the discharge of process water from the fixed screening and washing mechanism on the date of this inspection.

The process water discharge channel has filled up and needs to be cleaned out. The holding pond retention berms appeared to be breached. The majority of flow into the channel leading to the river appeared to be from the retention pond and ground water, see photos.

The USEPA Region 6 NPDES Permit Coordinator can be contacted for more information on how to submit an application for discharges of pollutants under the federal Clean Water Act. Process waters are not eligible for coverage under the NPDES Multi-Sector General Permit and require the facility to submit an application for individual coverage under the NPDES program. Discharges of these types of non-stormwater or process wastewater would not be allowable under the existing NPDES General Permit.

NMED/SWQB

Site Overview

City/County: Los Ojos/Rio Arriba County	
Location: Russell Sand & Gravel, Company, 150 County Rd. 340, Los Ojos, NM	
Subject: Overview of the facility.	



Sand wash area, pond to contain process water, channel joins discharge stream.

Discharge enters Rio Chama

NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Daniel Valenta	Date: 12/6/2012	Time: 1252
City/County: Los Ojos/Rio Arriba County		
Location: Russell Sand & Gravel, Company, 150 County Rd. 340, Los Ojos, NM, facing west.		
Subject: Fixed sand wash unit, discharge pipe of process water into channel to retention pond.		



Discharge pipe and filled channel leading to pond.

NMED/SWQB

Official Photograph Log

Photo # 2

Photographer: Daniel Valenta	Date: 12/6/2012	Time: 1252
City/County: Los Ojos/Rio Arriba County		
Location: Russell Sand & Gravel, Company, 150 County Rd. 340, Los Ojos, NM, facing southeast.		
Subject: Channel to pond.		



NMED/SWQB

Official Photograph Log

Photo # 3

Photographer: Daniel Valenta	Date: 12/6/2012	Time: 1255
City/County: Los Ojos/Rio Arriba County		
Location: Russell Sand & Gravel, Company, 150 County Rd. 340, Los Ojos, NM, facing southeast.		
Subject: Discharge from channel to pond		



NMED/SWQB

Official Photograph Log

Photo # 4

Photographer: Daniel Valenta	Date: 12/6/2012	Time: 1255
City/County: Los Ojos/Rio Arriba County		
Location: Russell Sand & Gravel, Company, 150 County Rd. 340, Los Ojos, NM, facing southwest.		
Subject: Sediment pond is alongside discharge channel to river.		



NMED/SWQB

Official Photograph Log

Photo # 5

Photographer: Daniel Valenta	Date: 12/6/2012	Time: 1256
City/County: Los Ojos/Rio Arriba County		
Location: Russell Sand & Gravel, Company, 150 County Rd. 340, Los Ojos, NM, facing southwest.		
Subject: Sediment pond appeared to be flowing into the discharge channel.		

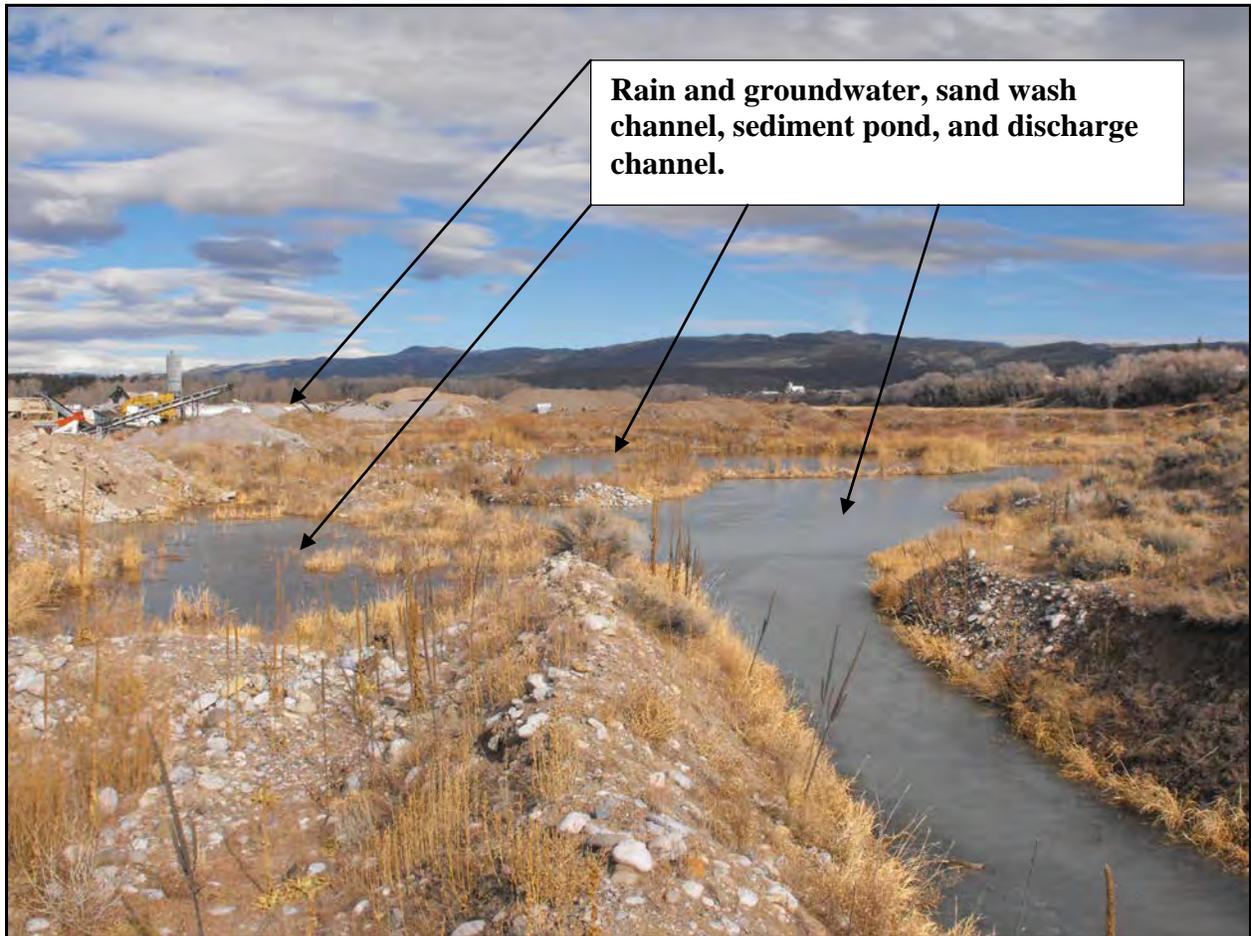


NMED/SWQB

Official Photograph Log

Photo # 6

Photographer: Daniel Valenta	Date: 12/6/2012	Time: 1231
City/County: Los Ojos/Rio Arriba County		
Location: Russell Sand & Gravel, Company, 150 County Rd. 340, Los Ojos, NM, facing southeast.		
Subject: View of area before flowing to discharge point.		

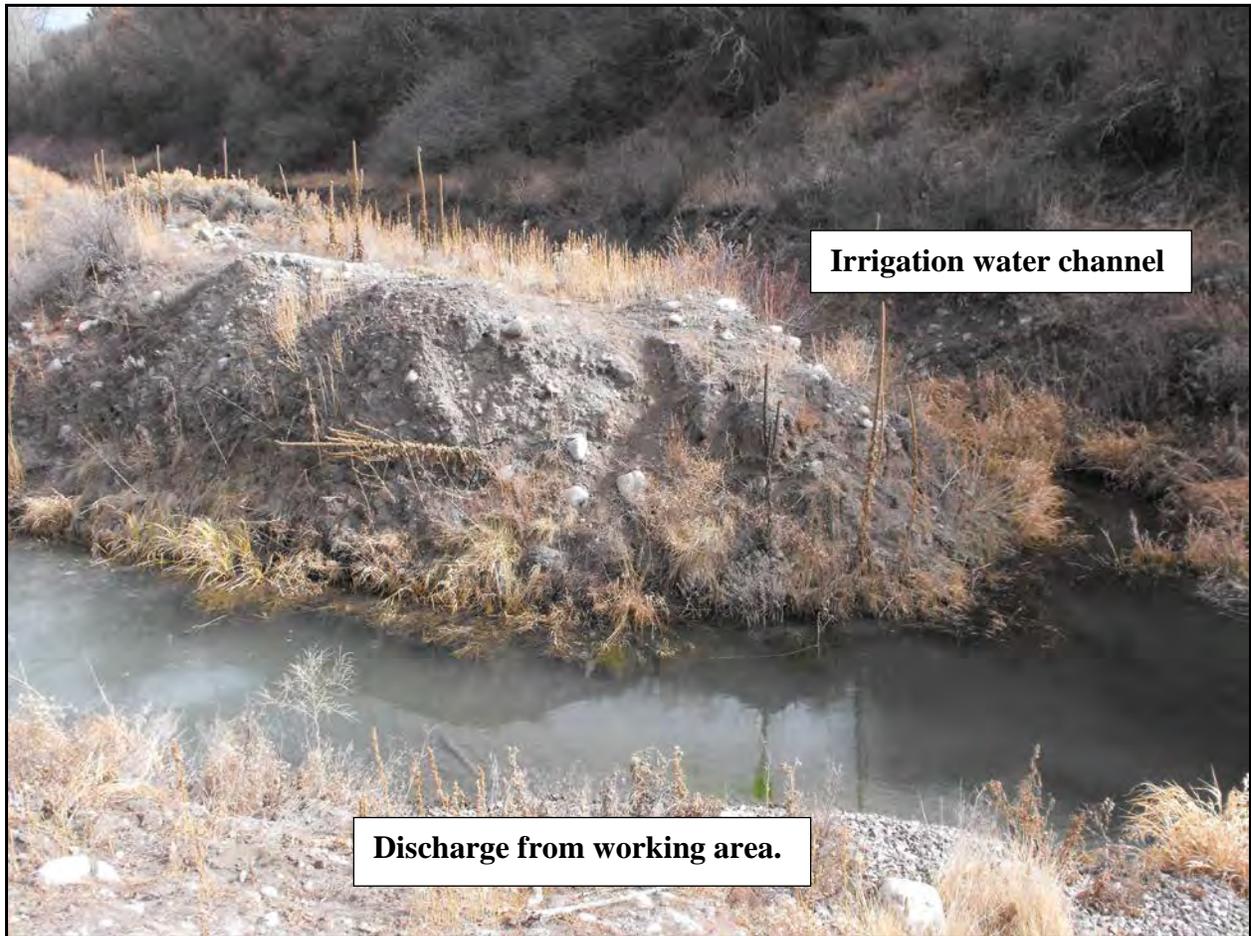


NMED/SWQB

Official Photograph Log

Photo # 7

Photographer: Daniel Valenta	Date: 12/6/2012	Time: 1228
City/County: Los Ojos/Rio Arriba County		
Location: Russell Sand & Gravel, Company, 150 County Rd. 340, Los Ojos, NM, facing southeast.		
Subject: The irrigation bypass channel joins the channel that drains the above working area.		



Irrigation water channel

Discharge from working area.

NMED/SWQB

Official Photograph Log

Photo # 8

Photographer: Daniel Valenta	Date: 12/6/2012	Time: 1217
City/County: Los Ojos/Rio Arriba County		
Location: Russell Sand & Gravel, Company, 150 County Rd. 340, Los Ojos, NM, facing west.		
Subject: Channel discharges to the Rio Chama, see overview.		





PO Box 296
Los Ojos, NM 87551

Phone: 575-588-7933
Fax: 575-588-9225
Email: rsg gravel@hotmail.com
Website: www.russellsandgravel.com

October 1, 2014

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Daniel Valenta, Environmental Scientist/Specialist
NMED-SWQB, PO Box 5469
Santa Fe, NM 87502-5469

Re: Russell Sand & Gravel Co., Inc. Reconnaissance Inspection-Minor, Unpermitted Discharge, SIC
1442 NPDES Permit Number: NMU001831, August 7, 2014

Dear Mr. Valenta:

On September 9, 2014 Russell Sand & Gravel Co., Inc. (RSG) received the subject Reconnaissance Inspection Report from the New Mexico Environment Department Surface Water Quality Bureau (NMED-SWQB) relating to RSG's site located in Los Ojos, New Mexico, requesting a response within 30 days. RSG has designed its Los Ojos facility to prevent wash water from its sand and gravel washing operation from leaving the site. Wash water is discharged into a primary containment pond which then overflows to a secondary containment pond. The water is stored in the secondary containment pond and is used for concrete batching operations and for dust abatement within the facility. RSG has a water right permit from the New Mexico Office of the State Engineer authorizing the conversion of its irrigation water rights to industrial and commercial use.

Nevertheless to address the concerns of the NMED-SWQB, RSG has filled in the overflow channel that is between the secondary containment pond and the irrigation ditch as indicated by the attached photos. This work was completed on September 30th, 2014. If you have any further questions in this regard, please contact me at (575) 588-7933, or by email at rsg gravel@hotmail.com.

Sincerely,

A handwritten signature in blue ink that reads 'Russell Casados'.

Russell Casados, President

cc: Racquel Douglas (6EN-W), USEPA Region 6, Enforcement Branch
1445 Ross Avenue, Suite 120, Dallas, TX 75202-2733

Bruce Yurdin, NMED-SWQB, Point Source Regulation Section, PO Box 5469
Santa Fe, NM 87502-5469

Clean fill placed in channel to prevent discharge from site



View to northeast

Overflow channel and rock check dam identified in photo #5, NMED Reconnaissance Report, 9/3/2014



View to northeast

Russell Sand & Gravel Co. NPDES# NMU001831
Los Ojos, New Mexico
Corrective action
Photo date: September 30, 2014