



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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RON CURRY  
Secretary  
SARAH COTTRELL  
Deputy Secretary

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December 9, 2010

Mr. Jay Parks, Owner  
San Antonio Self Storage LLC  
7121 Washington Ave. NE Suite B  
Albuquerque, NM 87109

**RE: Construction Storm Water, SIC 1542, NPDES Compliance Evaluation Inspection, San Antonio Self Storage, NMR10GR04, December 3, 2010**

Dear Mr. Parks:

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 cooperation and assistance 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,

Sarah Holcomb  
Surface Water Quality Bureau

Cc: Marcia Gail Adams, USEPA (6EN-AS) (by e-mail)  
Samuel Bates, USEPA (6EN-AS) (by e-mail)  
Carol Peters-Wagnon, USEPA (6EN-AS) (by e-mail)  
Diana McDonald, USEPA (6EN-AS) (by e-mail)



National Database Information		General	
Inspection Type	Compliance Evaluation	Inspector Name	Sarah Holcomb
NPDES ID Number	NMR10GR04	Telephone	(505) 222-9587
Inspection Date	12-3-2010	Entry Time	1445 hours, 12-3-2010
Inspector Type (circle one)	EPA <input type="checkbox"/> State <input type="checkbox"/> EPA Oversight <input type="checkbox"/>	Exit Time	1545 hours, 12-3-2010
Facility Type (circle one)	<input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Industrial Residential Municipal	Signature	

Facility Location Information					
Name/Location/ Mailing Address	San Antonio Self Storage 6240 San Antonio Dr. NE, Albuquerque, NM 87109 Mailing address: 7121 Washington Ave. NE, Suite B, Albuquerque, NM 87109				
GPS Coordinates	Latitude	N. 36° 9' 33.66"	Longitude	W. -106° 34' 36.25"	
Receiving Water(s)	Albuquerque MS4 thence to Rio Grande in segment 20.6.4.106 NMAC				
Disturbed Area	3.0 acres	Start Date	January 2010	Stop Date	8-31-2010

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	San Antonio Self Storage LLC	
Facility Contact	Mr. Jay Parks, Owner, San Antonio Self Storage LLC	505-991-1574
Authorized Official(s)	Mr. Jay Parks, Owner, San Antonio Self Storage LLC	505-991-1574

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

<b>Basic Permit Information</b>			<b>Basic SWPPP Information</b>		
Permit Coverage <i>ESO Element 3 &amp; 4</i>	<input checked="" type="checkbox"/>	N	SWPPP Prepared & Available <i>ESO Element 5 &amp; 30</i>	<input checked="" type="checkbox"/>	N
Permit Type	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory <i>ESO Elements 5 - 31</i>	<input checked="" type="checkbox"/>	N
Permit notice/sign visibly posted including: copy of NOI, contact name & phone number, location of SWPPP <i>ESO Element 41</i>	<input checked="" type="checkbox"/>	N	SWPPP Implementation Satisfactory <i>ESO Elements 32 - 48</i>	Y	<input checked="" type="checkbox"/>
NOI Date	11-23-2009		SWPPP Date	10-16-2009	
If applicable, is waiver certification & approval on file?	Y	N	<i>Intentionally left blank</i>		

<b>SWPPP Review (can be completed in office)</b>					
<b>General</b>				<b>Notes:</b>	
Is there a SWPPP? <i>ESO Element 5</i>	<input checked="" type="checkbox"/>	N		Prepared by Superior Stormwater.	
SWPPP completed prior to NOI submission? <i>ESO Element 6</i>	<input checked="" type="checkbox"/>	N			
Copy of permit language? <i>ESO Element 25</i>	<input checked="" type="checkbox"/>	N			
Is SWPPP consistent with state/tribal/local regulations and permits? <i>ESO Element 26</i>	Y	<input checked="" type="checkbox"/>		RUSLE Calculations were incomplete – only before and after numbers were given; no discussion of BMPs used during the project.	
SWPPP updated to incorporate changes to State, Tribal, Local erosion plans? <i>ESO Element 27</i>	Y	<input checked="" type="checkbox"/>			
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"/>	N			
Is a copy of the SWPPP on site or made available? <i>ESO Element 30</i>	<input checked="" type="checkbox"/>	N			
Did all “operators” sign/certify the SWPPP? <i>ESO Element 31</i>	<input checked="" type="checkbox"/>	N		Mr. Parks signed the SWPPP on 1-8-2010.	

<u>Site Description</u>		<b>Notes:</b>	
SWPPP identifies potential sources of pollution? <i>ESO Element 7</i>	<input checked="" type="checkbox"/>	N	Clearing/grubbing, grading/site excavation, vehicle tracking, topsoil stripping & stockpiling, landscaping installation.
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	
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 acres disturbed/3 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>	<input checked="" type="checkbox"/>	N	
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>	<input checked="" type="checkbox"/>	N	
Location of storm water discharges to a surface water on site map? <i>ESO Element 9F</i>	<input checked="" type="checkbox"/>	N	
Location of materials or equipment storage on site map (on-site or off-site)? <i>ESO Element 9F</i>	Y	N	N/A
Location/description industrial activities? <i>ESO Element 9G</i>	Y	N	N/A
Name of Receiving water(s) or MS4 listed?	<input checked="" type="checkbox"/>	N	<i>Note: Indicate whether receiving water is 303(d) listed.</i> <b>Pino Arroyo thence to Rio Grande (yes for E. coli)</b>
Does the SWPPP include dates of major grading activities, temporary/permanent construction cessation, and initiation of stabilization practices? <i>ESO Element 14</i>	<input checked="" type="checkbox"/>	N	Within inspection reports.
Endangered Species Documentation? <i>ESO Element 23</i>	<input checked="" type="checkbox"/>	N	Certified Criterion E.

<b>Controls to Reduce Pollutants</b>		<b>Notes:</b>	
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"/>	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>	<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>	<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"/>	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"/>	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>	<input checked="" type="checkbox"/>	N	Velocity dissipation through rock lined ditch to Pino Arroyo.
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	N	N/A
Does SWPPP describe measures to minimize off-site vehicle tracking and generation of dust? <i>ESO Element 18</i>	<input checked="" type="checkbox"/>	N	
Does SWPPP describe controls for pollutants from storage of construction or waste materials? <i>ESO Element 19</i>	<input checked="" type="checkbox"/>	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>	<input checked="" type="checkbox"/>	N	Firefighting, dust control, excavation dewatering, landscape irrigation, water line flushing.

<b>Controls to Reduce Pollutants (cont'd)</b>		<b>Notes:</b>
Does SWPPP ensure implementation of pollution prevention measures for non-storm water discharges? <i>ESO Element 22</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	However, see spill documentation in pictures.
Is SWPPP revised when BMPs added/modified within 7 days after inspection reveals problems? <i>ESO Element 29</i>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	There is no documentation to show that BMPs are added or modified.

<b>Inspections</b>		<b>Notes:</b>
Inspections performed once every 14 days and within 24 hours of a rain event greater 0.5"? <i>ESO Element 32</i>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	There may be a couple of rain event inspections missing.
Inspections performed by qualified personnel? <i>ESO Element 33</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
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	
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>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	

## Notes on SWPPP Review

### **Site Description:**

This site occupies about 3 acres, where the owner is building self storage units, with an on-site residence. The land previously had to be excavated, as the property was a previous landfill.

This inspection was prompted by a discharge from the construction site. The interior of the self storage units is currently being paved. The hydraulic machine being used had a leak of hydraulic fluid, and concurrently, a water truck being used for dust control purposes let large amounts of water go, flushing the hydraulic fluid into the adjacent Piño Arroyo. The fluid traveled about a mile and a half down the arroyo and most likely made it into the North Diversion Channel. The inspector observed that the water at least made it past Jefferson Blvd., which is about a mile and a half.

There were a few paperwork issues:

Although the SWPPP was dated 11-16-2009, Mr. Parks did not sign it until 1-8-2010. Also, Michael David Tull signed the SWPPP as the engineer (including a certification statement) which is unneeded. An engineer can sign a different statement but signing the certification statement is duplicative and not necessary.

RUSLE calculations were performed to comply with Appendix 10.D.1.b. However, only the before and after results were given; none of the work in between (to show that BMPs chosen for the site were appropriate) were shown.

Inspections looked to be in order. Extensive rain log was maintained with the SWPPP. Within the inspections, there were some maintenance issues that did not appear to be addressed right away. For instance, it was noted on the 3-10-10 inspection that the site entrance cobble needed to be refreshed and this did not occur until the 5-19-10 inspection noted the repair. This was also true for a silt fence maintenance issue (repair noted on 5-19-10, as well) and another silt fence issue (repair noted on 9-8-10).

<b>SWPPP Implementation</b> <i>(complete in field)</i>	
<b><u>Stabilization Practices</u></b>	
<p><b>List and describe stabilization practices</b> <i>ESO Element 43, 48</i></p>	<p><i>(e.g., seeding, mulching, geotextiles, sod stabilization)</i></p> <p>Facility was currently being paved with asphalt.</p>
<p><b>Are stabilization measures initiated no more than 14 days after temporary or permanent construction cessation?</b> <i>ESO Element 46</i></p>	<p><i>(e.g., indicate “yes” or “no”; if “yes”, how long without stabilization measures?)</i></p> <p>Difficult to tell from documentation.</p>

<b><u>Structural Practices</u></b>	
<p><b>List and describe structural controls</b> <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> <ol style="list-style-type: none"> <li>1. Exterior walls of the self storage unit.</li> <li>2. Rock cobble leading from discharge point into the Piño Arroyo.</li> </ol>
<b><u>Non-Structural Practices</u></b>	
<p><b>Street Cleaning</b> <i>ESO Element 44</i></p>	<p><i>(e.g., describe measures taken to remove offsite accumulation of sediment)</i></p> <p>Sweeping is performed as needed.</p>
<p><b>Good Housekeeping &amp; Waste Disposal Practices</b> <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>Trash is picked up as needed.</p>

## NPDES Industrial Storm Water Worksheet (Construction)

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

NMED/SWQB  
**Official Photograph Log**  
Photo # 1

Photographer: Sarah Holcomb	Date: 12-3-2010	Time: 1445 hours
City/County: Albuquerque/Bernalillo County		
Location: Discharge point along Piño Arroyo.		
Subject: Discharge point from construction site. Site was being paved and according to the site owner/contractor, there was a hydraulic fluid leak combined with a water truck releasing much more water than was supposed to occur for dust control.		



NMED/SWQB  
**Official Photograph Log**  
Photo # 2

Photographer: Sarah Holcomb	Date: 12-3-2010	Time: 1445 hours
City/County: Albuquerque/Bernalillo County		
Location: Discharge point along Piño Arroyo.		
Subject: Another view of the discharge into the arroyo. The inspector was able to note the color of the discharge down the arroyo for about a mile and a half. It is possible that the discharge made it to the North Diversion Channel.		

