



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](http://www.nmenv.state.nm.us)

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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Deputy Secretary

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

October 23, 2012

Kevin Whitfield  
DSW Santa Fe, LLC managed by Drury Southwest, Inc.  
11331 Coker Loop East  
San Antonio, Texas 78216

**RE:** Construction Storm Water, SIC 1522, NPDES Compliance Evaluation Inspection, DSW Santa Fe, LLC/  
Drury Plaza Hotel Project, Santa Fe, NMR12A077, October 4, 2012

Dear Mr. Whitfield:

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 2003/8 Construction General Permit (CGP), Definitions, Appendix A). 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 worksheet inspection report. You are encouraged to review the inspection report; and 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 regarding modifications and compliance schedules both the USEPA (Diana McDonald, USEPA (6EN-WM), 1445 Ross Avenue, Dallas, Texas 75202-2733) and the NMED Surface Water Quality Bureau Program Manager (at the address above).

I appreciate the cooperation of William "Lew" Lewis, Project Superintendent, Drury Southwest, Inc. during this inspection. If you have any questions about this inspection report, please contact me at 505-827-0418.

Sincerely,

/s/Erin S. Trujillo  
Erin S. Trujillo  
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN) by e-mail  
Hannah Branning, USEPA (6EN-WC) by e-mail  
Darlene Whitten-Hill, USEPA (6EN-WC) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Diana McDonald, USEPA (6EN-WM) by e-mail  
Robert Italiano, NMED District II Santa Fe by e-mail  
William "Lew" Lewis, Project Superintendent, Drury Southwest, Inc. by e-mail



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

| National Database Information  |  | General        |                     |
|--------------------------------|--|----------------|---------------------|
| Inspection Type                | CEI  | Inspector Name | Erin S. Trujillo    |
| NPDES ID Number                | NMR12A077  | Telephone      | 505-827-0418        |
| Inspection Date                | 10/04/2012   | Entry Time     | 1150 hours          |
| Inspector Type<br>(circle one) | EPA <input checked="" type="checkbox"/> State EPA Oversight                              | Exit Time      | 1625 hours          |
| Facility Type<br>(circle one)  | <input checked="" type="checkbox"/> Commercial / Residential /<br>Municipal / Industrial | Signature      | /s/Erin S. Trujillo |

| Facility Location Information |   |                  |  |            |
|-------------------------------|---|------------------|--|------------|
| Name/Location/Mailing Address | Drury Plaza Hotel Project (southwest corner of East Palace Avenue and Paseo de Peralta), 228 East Palace Avenue, Santa Fe, NM. Santa Fe County                |                  |  |            |
| Coordinates                   | Latitude  | 35.6860°         | Longitude                              | -105.9346° |
| Receiving Waters              | Stormwater discharges to Santa Fe MS4, thence to Santa Fe River (Santa Fe WWTP to Nichols Reservoir) unclassified Segment 20.6.4.98 NMAC in Rio Grande Basin. |                  |  |            |
| Disturbed Area                | 2.5 acres / 4.5 acres   | Start/Stop Dates | start 03/24/12 / stop 12/01/2013 (NOI) |            |

| Contact Information   |   |              |
|---|---|--------------|
|   | Name(s)   | Telephone    |
| Name(s) and Role(s) of All Parties Meeting the Definition of Operator | DSW Santa Fe, LLC managed by Drury Southwest, Inc., | 210-490-4779 |
| Facility Contact  | William "Lew" Lewis                                 | 210-490-4779 |
| Authorized Official(s)  | Kevin Whitfield                                     | 210-490-4779 |

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

| Basic Permit Information  |   |   | Basic SWPPP Information                                 |                                       |                                       |
|---|---|---|---|---------------------------------------|---------------------------------------|
| Permit Coverage   | <input checked="" type="checkbox"/> Y       | N   | SWPPP Prepared & Available?<br><i>Part 7.1.1, 7.2.1</i> | <input checked="" type="checkbox"/> Y | N                                     |
| Permit Type   | <input checked="" type="checkbox"/> General | Individual  | SWPPP Contents Satisfactory?                            | Y                                     | <input checked="" type="checkbox"/> N |
| Notice Posted (visible, font large, NPDES Permit tracking#, contact name & phone #) <i>Part 1.5</i> | Y   | <input checked="" type="checkbox"/> N<br>not complete | SWPPP Implementation Satisfactory?                      | Y                                     | <input checked="" type="checkbox"/> N |
|   | NMR12A077                                   | NMR10HJ68   |   | NMR12A077                             | NMR10HJ68                             |
| NOI Date  | 04/06/2012                                  | 10/04/2011  | SWPPP Date  | 03/12/2012                            | 10/18/2011                            |
| Is NOI Satisfactory?  | Y   | <input checked="" type="checkbox"/> N                 |   |                                       |                                       |

| Additional Facility and Inspection Information (optional)  |
|--|
| <p>Upon arrival, the Inspector Erin Trujillo made introductions, presented credentials, and explained the purpose of this inspection. Ms. Trujillo and Mr. Lewis toured the site. Ms. Trujillo conducted an exit interview to provide preliminary findings to Mr. Lewis on site. This report is based on a review of the EPA online notice of intent (eNOI) database, review of files maintained by the Permittee and NMED, on-site observation by NMED personnel, and verbal information provided by the permittee on-site representative. Additional information was obtained from the USEPA eNOI processing center and Brad Frosch, Tierra West LLC, Albuquerque, NM following this inspection. The Drury Plaza Hotel Project, a common plan of development is to be constructed in two phases, includes demolition; remodeling existing structures (hospital, hall, and boiler building) into a hotel, inn, retail and restaurant; new construction and landscaping. New construction includes a parking garage. The start of construction activity for Phase II had not been scheduled according to the Permittee on-site representative.</p> |

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

| SWPPP Review ( <i>can be completed in office</i> )   |                                     |                                     |  |
|--|-------------------------------------|-------------------------------------|--|
| General  | Notes:                              |                                     |  |
| <b>SWPPP Signed/Certified.</b> Did all operators sign/certify the SWPPP?<br><i>Part 7.2.15, Appendix I.11</i>  | <input checked="" type="checkbox"/> | N                                   | SWPPP prepared by Tierra West LLC, Albuquerque, NM.  |
| <b>SWPPP completed prior to NOI?</b><br><i>Part 7.1.1, Part 1.2.1</i>  | Y                                   | N                                   | Y = 2012 CGP / N = 2008 CGP. SWPPP prepared 10/03/2012 (plan title page dated 10/04/2011); but, not completed “signed/certified” prior to NOI (plan signed/certified on 10/18/2011 and NOI submitted on 10/04/2011 to obtain permit coverage under the 2008 CGP)   |
| <b>Endangered Species Act.</b> Does SWPPP include documentation supporting determination?<br><i>Part 7.2.14.1; Part 1.1.e, Appendix D</i>  | <input checked="" type="checkbox"/> | N                                   |  |
| <b>Historic Properties.</b> Does SWPPP include documentation supporting determination?<br><i>Part 7.2.14.2, Appendix E</i>   | <input checked="" type="checkbox"/> | N                                   |  |
| <b>If applicable, documents contact with agency or office responsible for implementing Safe Drinking Water Act <u>underground injection control well(s)</u>?</b><br><i>Part 7.2.14.3, 40 CFR Parts 144 -147</i>  | Y                                   | N                                   | Not applicable   |
| <b>Post-Authorization Additions.</b> Does SWPPP include:<br><ul style="list-style-type: none"> <li>➤ Copy of acknowledgement letter <b>N (2012)</b></li> <li>➤ Copy of NOI <b>Y (2008) / N (2012)</b></li> <li>➤ Copy of permit <b>Y (2008) / N (2012)</b></li> </ul> <i>Part 7.2.16.3</i>   | Y                                   | <input checked="" type="checkbox"/> |  |
| <b>If applicable, SWPPP describes compliance with any case-by-case basis USEPA imposed water quality-based effluent limitation requirements?</b><br><i>Part 3</i>  | Y                                   | N                                   | No documentation of USEPA imposed water quality-based effluent limits. But, NOI and SWPPP was not correct or complete on list of impaired waters. See notes below.   |
| <b>If discharge to an impaired water, includes records of all data used to complete NOI:</b><br><ul style="list-style-type: none"> <li>➤ List of all impaired waters <b>Y</b></li> <li>➤ Pollutant(s) for which the surface water is impaired <b>Not Complete</b></li> <li>➤ Whether a TMDL has been approved or established <b>Not Complete</b></li> </ul> <i>Part 3.2.1, Appendix I.15</i>           | Y                                   | <input checked="" type="checkbox"/> | SWPPP included TMDL list dated 10/04/2011. But, NOI only indicated Rio Grande (impaired for pathogens), and not impairments to this assessment unit of the Santa Fe River.<br><br><i>Comment: Unclassified Santa Fe River from the WWTP to Nichols Reservoir is listed as not supporting marginal warmwater aquatic life, primary contact or wildlife habitat. Listed probable causes of impairment include Aluminum, E.coli and PCBs. A TMDL has not been approved or established. Listed probable sources of impairment are atmospheric deposition-toxics, contaminated sediments, inappropriate waste disposal source unknown, and urban runoff/storm sewers.</i> |
| <b>Required SWPPP modifications completed?</b><br><ul style="list-style-type: none"> <li>➤ Completed w/7 days <b>Not documented</b></li> <li>➤ Maintains modification records showing dates, name of person authorizing change and summary <b>N</b></li> <li>➤ Signed/Certified <b>N</b></li> <li>➤ Immediately notified other operators <b>NA</b></li> </ul> <i>Parts 7.4, 5.2.2, Appendix I.11.b</i> | Y                                   | <input checked="" type="checkbox"/> | See notes below (e.g., sediment pond shown/described, but not implemented; track out locations not updated) . Also, updates for 2012 CGP not complete.   |
| <b>Records Retention.</b> 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?<br><i>Parts 4.1.7, 5.4.4, Appendix I.10.2, I.15</i>   | Y                                   | <input checked="" type="checkbox"/> | See notes above on post authorizations.  |

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

| Team & Activity Description  |                                     |                                     | Notes:  |
|--|-------------------------------------|-------------------------------------|---|
| <b>Identifies stormwater team personnel and responsibilities?</b><br>➤ Personnel (by name or position) <b>Y</b><br>➤ Individual responsibilities <b>Y</b><br><i>Part 7.2.1</i>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |   |
| <b>Is staff training documented?</b><br>➤ Training occurs prior to the commencement of earth-disturbing activities or pollutant-generating activities, whichever occurs first <b>N</b><br>➤ Ensures following understand the requirements of this permit and their specific responsibilities:<br>○ Personnel responsible for the design, installation, maintenance, and/or repair of controls/measures <b>Not documented</b><br>○ Personnel responsible for the application and storage of treatment chemicals <b>N</b><br>○ Personnel responsible for conducting inspections <b>N</b><br>○ Personnel responsible for taking corrective actions <b>Not documented</b><br>➤ At a minimum, training includes:<br>○ Location of all stormwater controls on the site required by this permit, and how maintained <b>N</b><br>○ Proper procedures to follow with respect to the permit's pollution prevention requirements <b>N</b><br>○ When and how to conduct inspections, record applicable findings, and take corrective actions <b>N</b><br><i>Parts 7.2.13, 6 and permit notes for emergency-related construction activities</i> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Training for SWPPP preparer was documented. Also, personnel responsible, in this case project superintendent, described on-the-job experience. But, minimum training requirements of 2012 CGP not documented.   |
| <b>Describes nature of construction activities?</b><br>➤ Size of the property <b>Y</b><br>➤ Total area to be disturbed <b>Y</b><br>➤ Construction support activity areas <b>Not documented</b><br>➤ Maximum area to be disturbed at any one time <b>Not documented</b><br><i>Part 7.2.2</i>  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Not documented. Some on-site areas were not disturbed. Info on location of off-site areas was included. But, SWPPP did not describe if off-site fill areas were eligible for permit coverage under the CGP (e.g., off-site excavated material disposal areas that serve multiple unrelated projects would not be eligible for coverage). Forms with more detail on fill/borrow areas were in SWPPP, but were not completed. |
| <b>If applicable, documents emergency-related projects?</b><br>➤ Cause of public emergency (e.g., natural disaster, extreme flooding conditions, etc.) <b>Y/N</b><br>➤ Info substantiating occurrence (e.g., state disaster declaration or similar state or local declaration) <b>Y/N</b><br>➤ Description of the construction necessary to reestablish effected public services <b>Y/N</b><br><i>Parts 7.2.3, 1.2</i>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Not applicable  |
| <b>Identifies (lists) other site operators and areas of site over which each has control?</b><br>➤ List and areas of site over which each has control <b>NA</b><br><i>Part 7.2.4</i>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Not applicable / no other operators identified  |

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

|   |   |                                   |  |
|---|---|-----------------------------------|--|
| <p><b>Describes sequence, estimated dates (departures) and duration of construction activities?</b></p> <ul style="list-style-type: none"> <li>➤ Installation of control measures when operational <b>N</b></li> <li>➤ Commencement/duration clearing &amp; grubbing, mass grading, site preparation (excavating, cutting &amp; filling), final grading, and creation of soil &amp; vegetation stockpiles <b>N</b></li> <li>➤ Cessation, temporarily or permanently, of construction activities on the site, or in designated portions of site <b>N</b></li> <li>➤ Final/temporary stabilization areas of exposed soil <b>N</b></li> <li>➤ Removal of temporary stormwater conveyances/channels and other stormwater control measures <b>N</b></li> <li>➤ Removal of construction equipment and vehicles <b>N</b></li> </ul> <p><i>Part 7.2.5</i></p> | Y | <input type="checkbox"/> <b>N</b> | <p>SWPPP lists date of beginning excavation and shoring garage on 04/01/2012. Site map included some sequence. But, SWPPP and site map was not updated to include all requirements of 2012 CGP, including existing project construction activities, dates and duration. Also, site map shows sediment pond that was not observed on-site, but date of installation or modification of plan not documented.</p> |
|---|---|-----------------------------------|--|

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

| Site Map   |                                       |                                       | Notes:  |
|--|---------------------------------------|---------------------------------------|---|
| Includes legible site map(s)?<br><i>Part 7.2.6</i>   | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N            |   |
| <ul style="list-style-type: none"> <li>➤ Boundaries of the property <b>Y</b></li> <li>➤ Locations construction activities will occur <b>Y</b></li> <li>➤ Locations earth-disturbing activities will occur (note any phasing) <b>N (phasing)</b></li> <li>➤ Approximate slopes before and after major grading (note steep slopes) <b>N</b></li> <li>➤ Locations sediment, soil, or materials will be stockpiled <b>N</b></li> <li>➤ Locations of crossings of surface waters <b>NA</b></li> <li>➤ Designated points vehicles exit onto paved roads <b>Y</b></li> <li>➤ Locations of structures/impervious surfaces upon completion <b>Y</b></li> <li>➤ Locations of construction support activity areas <b>Y (on site)</b></li> </ul> <i>Part 7.2.6.1</i> | Y                                     | <input checked="" type="checkbox"/> N | Site map, in this case sedimentation and erosion control plan dated 6/21/2011, not updated.   |
| <ul style="list-style-type: none"> <li>➤ Locations of surface waters/wetlands, within or in immediate vicinity <b>N</b></li> <li>➤ Indicates waters listed as impaired, and Tier 2, <del>Tier 2.5</del>, or Tier 3 <b>N</b></li> </ul> <i>Part 7.2.6.2</i>   | Y                                     | <input checked="" type="checkbox"/> N | Location of Santa Fe River not shown. Discharges are to an assessment unit of the Santa Fe River that is impaired for some parameters (Tier 1). In the State of New Mexico, Tier 2 may apply to unclassified waters on a parameter-by-parameter basis depending on the available water quality information. For some parameters (e.g. copper, lead, selenium, etc.) , available data for this assessment unit of the Santa Fe River from the WWTP to Nichols Reservoir do not exceed applicable-aquatic life criteria. Therefore, receiving stream may also be considered a Tier 2 water. |
| <ul style="list-style-type: none"> <li>➤ Boundary lines of natural buffers</li> </ul> <i>Parts 7.2.6.3, 2.1.2.1a</i>   | Y                                     | <input type="checkbox"/> N            | Not applicable  |
| <ul style="list-style-type: none"> <li>➤ Areas of federally-listed critical habitat for endangered or threatened species</li> </ul> <i>Part 7.2.6.4</i>  | Y                                     | <input type="checkbox"/> N            | Not applicable  |
| <ul style="list-style-type: none"> <li>➤ Topography <b>N</b></li> <li>➤ Existing vegetative cover <b>N</b></li> <li>➤ Drainage pattern of stormwater/authorized non-stormwater flow onto, over, and from site <u>before and after</u> major grading <b>N</b></li> </ul> <i>Part 7.2.6.5</i>  | Y                                     | <input checked="" type="checkbox"/> N |   |
| <ul style="list-style-type: none"> <li>➤ Stormwater and allowable non-stormwater discharge locations <b>N</b></li> <li>➤ Locations of storm drain inlets on site and immediate vicinity <b>Y (on site), N (vicinity)</b></li> <li>➤ Locations stormwater or allowable non-stormwater will be discharged to surface waters (including wetlands) on or near site <b>NA</b></li> </ul> <i>Part 7.2.6.6</i>  | Y                                     | <input checked="" type="checkbox"/> N | Inlets on adjacent streets and location of Santa Fe River not shown.  |
| <ul style="list-style-type: none"> <li>➤ Locations of potential pollutant-generating activities</li> </ul> <i>Part 7.2.6.7, Part 7.2.7</i>   | Y                                     | <input checked="" type="checkbox"/> N | Vehicle fueling and fluid storage area not shown. Portable toilet location not updated.   |
| <ul style="list-style-type: none"> <li>➤ Locations of control measures</li> </ul> <i>Part 7.2.6.8</i>  | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N            |   |
| <ul style="list-style-type: none"> <li>➤ Locations polymers, flocculants, or treatment chemicals will be used/stored</li> </ul> <i>Part 7.2.6.9</i>  | Y                                     | <input type="checkbox"/> N            | Use of tackifiers for stabilization discussed. Map not updated with specific chemical storage location or plan not modified to indicate if or when to be stored on site.  |

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

| Construction Site Pollutants   |                                       |   | Notes:   |
|--|---------------------------------------|---|--|
| <b>Includes pollutant-generating activities list and description?</b><br><i>Part 7.2.7.1</i>   | <input checked="" type="checkbox"/> Y | N |  |
| <b>Includes inventory of pollutants or constituents?</b><br>➤ Inventory <b>Y</b><br>➤ Potential spills/leaks <b>Y</b><br>➤ Departures from manufacturer's specifications for applying fertilizers containing nitrogen & phosphorus <b>NA</b><br><i>Parts 7.2.7.2, 2.3.5.1</i>  | <input checked="" type="checkbox"/> Y | N | Use of fertilizers not applicable / not identified in SWPPP.   |
| <b>Identifies all sources of allowable non-stormwater discharges?</b><br><i>Parts 7.2.8, 1.3.d</i>   | <input checked="" type="checkbox"/> Y | N |  |
| <b>If required (surface water w/50 feet of earth disturbance), documents and describes <u>buffer compliance alternative</u> selected?</b><br>➤ 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<br>➤ Uses velocity dissipation devices, if necessary Y/N/NA<br>➤ Documents natural buffer width Y/N/NA<br>➤ Delineates, and clearly marks off, with flags, tape, or other similar marking device all natural buffer areas Y/N/NA<br>➤ Documents erosion and sediment control(s) used to achieve an equivalent sediment reduction Y/N/NA<br>➤ Documents any information relied upon to demonstrate equivalency Y/N/NA<br><i>Parts 7.2.9, 2.1.2, Appendix G</i> | Y                                     | N | Not applicable / not required<br><br><u>Comment:</u> Santa Fe River is over 50 feet from this construction activity disturbance. 2012 CGP states, "EPA does not consider designed stormwater control features (e.g., stormwater conveyance channels, storm drain inlets, stormwater basins) that direct storm water to surface waters more than 50 feet from the disturbance to constitute surface waters for the purposes of determining if the buffer requirements apply." |
| <b>As applicable, describes and documents <u>buffer exceptions</u>?</b><br>➤ Describes rationale/why infeasible to provide and maintain an undisturbed natural buffer of any size Y/N/NA<br>➤ For linear project, describes buffer width retained and supplemental controls installed Y/N/NA<br>➤ Small residential lot options Y/N/NA<br>➤ Documents CWA Section 404 Permit, water-dependent structure/access disturbances Y/N<br><i>Parts 7.2.9; 2.1.2.1e, Appendix G</i>  | Y                                     | N | Not applicable / not required (see comments above)   |

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

| All Stormwater Control Measures   |  | Notes:  |
|---|--|---|
| <p><b>Describes each measure?</b></p> <ul style="list-style-type: none"> <li>➤ Type of measure to be installed and maintained, including design information <b>Y</b></li> <li>➤ Specific sediment controls installed and made operational prior to conducting earth-disturbing activities <b>Y</b></li> <li>➤ For exit points, stabilization techniques and any additional controls planned to remove sediment prior to vehicle exit <b>Y</b></li> <li>➤ For linear projects (if applicable), where/why it has been determined that the use of perimeter controls is practicable <b>NA</b></li> </ul> <p><i>Part 7.2.10.1</i></p>   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |   |
| Erosion and Sediment Controls   |  | Notes:  |
| <p><b>Minimizes <u>area of disturbance</u>?</b></p> <p><i>Part 2.1.1.1</i></p>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |   |
| <p><b>Describes erosion and sediment control <u>design</u> requirements?</b></p> <ul style="list-style-type: none"> <li>➤ Accounts for expected amount, frequency, intensity, duration of precipitation <b>Y</b></li> <li>➤ Accounts for nature of run-on and run-off (channelized peak flow rates &amp; total volume at outlet) <b>Not described</b></li> <li>➤ Accounts for range of soil particle sizes (distribution, erosivity and cohesiveness) <b>Y</b></li> <li>➤ Directs discharge to vegetated areas to increase sediment removal and infiltration unless infeasible <b>Not documented if feasible</b></li> <li>➤ Uses velocity dissipation, if necessary <b>NA</b></li> <li>➤ Complies with State of New Mexico except Indian country requirements:               <ul style="list-style-type: none"> <li>○ 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 <b>N</b></li> <li>○ Selection based on appropriate soil loss prediction models (results in sediment yields/flow velocities, that to the maximum extent practicable, will not be greater than the sediment yield levels and flow velocities from pre-construction, pre-development conditions ) <b>N</b></li> </ul> </li> </ul> <p><i>Parts 2.1.1.2, 9.4.1.1</i></p> | Y <input checked="" type="checkbox"/> N                          | <p>RUSLE2 records contained in SWPPP did not document compliance with Part 9.4.1.1 of the 2012 CGP (sediment yields were greater during construction with controls than pre-construction). Prediction model indicated the following sediment loss: pre-construction = 0.24 tons/ac/yr with support practices silt fence; during construction grading = 2.2 tons/ac/yr with support practice silt fences; and post construction = 0.25 tons/ac/yr with no support practice. Reason for including control in pre-construction calculation was not documented. SWPPP did not include other information (e.g., reasons for assumptions, use of another soil loss prediction model, other measures that reduce soil loss, etc.) to document that the site-specific selection of control measures prevent an increase in sediment yield levels to the maximum extent practicable. For example, on-site observations that may reduce soil loss, included not entirely disturbing site on the day of this inspection, and perimeter slopes may contain some run off on site. Also, use of a sediment pond shown on the site map did not appear to have been evaluated in prediction model calculations included in SWPPP. The use of sediment pond was not observed on site. It is not documented why this measure was not used or why it would not be practicable.</p> |
| <p><b>Describes erosion and sediment control <u>installation</u> requirements?</b></p> <ul style="list-style-type: none"> <li>➤ Completes installation of downgradient stormwater/sediment controls by the time or immediately following earth-disturbance begins unless infeasible <b>Y</b></li> <li>➤ Installs all other controls and makes operational as soon as conditions allow <b>N</b></li> <li>➤ Uses good engineering practices and follows manufacturer's specifications or explain departures <b>Y</b></li> </ul> <p><i>Part 2.1.1.3</i></p>  | Y <input checked="" type="checkbox"/> N                          | <p>Use of a sediment pond, as shown on site map, was not observed on site.</p>  |

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

|  |                                       |                            |  |
|--|---------------------------------------|----------------------------|--|
| <p><b>Describes erosion and sediment control maintenance requirements?</b></p> <ul style="list-style-type: none"> <li>➤ Initiates fix immediately and completed by close of next work day (routine maintenance) <b>N</b></li> <li>➤ Installs new measure/significant repair no later than 7 calendar days or document why infeasible <b>N</b></li> </ul> <p><i>Part 2.1.1.4</i></p>  | Y                                     | <input type="checkbox"/> N | Not all described maintenance was updated for effluent limitations in Part 2 of 2012 CGP.                |
| <p><b>Installs perimeter controls and describes maintenance (removes sediment before it has accumulated to 1/2 of the above-ground height)?</b></p> <p><i>Part 2.1.2.2</i></p>   | <input checked="" type="checkbox"/> Y | N                          |  |
| <p><b>Minimizes sediment track-out?</b></p> <ul style="list-style-type: none"> <li>➤ Restricts vehicle use to properly designated exit points? <b>Y</b></li> <li>➤ Uses appropriate stabilization techniques at all points that exit onto paved roads? <b>Y</b></li> <li>➤ Where necessary, uses additional measures to remove sediment prior to exit? <b>NA</b></li> <li>➤ Removes tracked out sediment prior to the end of the same work day or if occurs on non-work day the next work day? <b>Y</b></li> </ul> <p><i>Part 2.1.2.3</i></p>  | <input checked="" type="checkbox"/> Y | N                          |  |
| <p><b>Controls discharges from stockpiled sediment or soil?</b></p> <ul style="list-style-type: none"> <li>➤ Locates piles outside of buffers <b>NA</b></li> <li>➤ Locates piles separate from stormwater controls <b>Y</b></li> <li>➤ Uses temporary sediment barrier <b>Not described</b></li> <li>➤ Where practicable, provides cover or temporary stabilization <b>N (cover)</b></li> <li>➤ Does not hose down or sweep into stormwater conveyance unless connected to basin, trap, etc. <b>Not described</b></li> <li>➤ Contains and securely protects pile from wind? <b>Not described</b></li> </ul> <p><i>Part 2.1.2.4</i></p> | Y                                     | <input type="checkbox"/> N | Described controls not updated to ensure compliance with all effluent limitations in Part 2 of 2012 CGP. |
| <p><b>Minimizes dust?</b></p> <p><i>Part 2.1.2.5</i></p>   | <input checked="" type="checkbox"/> Y | N                          |  |
| <p><b>Minimizes disturbance of steep slopes?</b></p> <p><i>Part 2.1.2.6</i></p>  | <input checked="" type="checkbox"/> Y | N                          |  |
| <p><b>Preserves topsoil, unless infeasible?</b></p> <p><i>Part 2.1.2.7</i></p>   | Y                                     | <input type="checkbox"/> N | Not described if feasible for existing project.  |
| <p><b>Minimizes soil compaction where final vegetative stabilization or infiltration installed?</b></p> <p><i>Part 2.1.2.8</i></p>   | Y                                     | <input type="checkbox"/> N | Not described if feasible for existing project.  |
| <p><b>Protects storm drain inlets and describes maintenance requirements (removes sediment by the end of the same work day or end of the following work day)?</b></p> <p><i>Part 2.1.2.9</i></p>   | Y                                     | <input type="checkbox"/> N | Described maintenance was not updated for effluent limitations in Part 2 of 2012 CGP.                    |
| <p><b>Describes constructed conveyance channel controls (if installed)?</b></p> <p><i>Part 2.1.3.1</i></p>   | Y                                     | N                          | Not applicable / none observed   |

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

|   |   |                                       |  |
|---|---|---------------------------------------|--|
| <p><b>Describes <u>sediment basin</u> design (if installed) and maintenance (maintain at least ½ of capacity at all times)?</b><br/><i>Part 2.1.3.2</i></p>   | Y | N                                     | Not applicable / Described, but not used on site.  |
| <p><b>Describes <u>treatment chemical</u> controls (if used)?</b><br/><i>Part 2.1.3.3</i></p>   | Y | <input checked="" type="checkbox"/> N | Discusses use of tackifiers for stabilization, but described controls not updated for effluent limitations in Part 2 of 2012 CGP or plan not modified. |
| <p><b>Includes documentation for use of <u>treatment chemicals</u> (polymers, flocculants, or other treatment chemicals)?</b></p> <ul style="list-style-type: none"> <li>➤ 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 <b>N</b></li> <li>➤ Lists all treatment chemicals and why the selection of these chemicals is suited to the soil characteristics <b>N</b></li> <li>➤ 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 <b>NA</b></li> <li>➤ Dosage/methodology to determine dosage <b>N</b></li> <li>➤ Information from any applicable MSDS <b>N</b></li> <li>➤ Schematic drawings of any chemically-enhanced or chemical treatment systems <b>NA</b></li> <li>➤ Description of how chemicals will be stored <b>Y</b></li> <li>➤ References to applicable state or local requirements and copies of applicable manufacturer’s specifications <b>N</b></li> <li>➤ Description of training that personnel have received or will receive <b>N</b></li> </ul> <p><i>Parts 7.2.10.2, 2.1.3.3h</i></p> | Y | <input checked="" type="checkbox"/> N | Discusses use of tackifiers for stabilization, but described controls not updated for effluent limitations in Part 2 of 2012 CGP or plan not modified. |
| <p><b>Describes <u>dewatering</u> controls (if installed)?</b><br/><i>Part 2.1.3.4</i></p>  | Y | N                                     | Not applicable / no dewatering observed / controls not installed   |

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

| Stabilization Requirements   | Notes:                                |                            |  |
|--|---------------------------------------|----------------------------|--|
| <p><b>Describes compliance with deadlines for vegetative and/or non-vegetative stabilization practices, including exceptions?</b></p> <p><u>Deadline to Initiate</u></p> <ul style="list-style-type: none"> <li>➤ Initiates stabilization immediately (no later than end of next work day following earth-disturbing activities permanently/temporarily ceased) <b>N</b></li> </ul> <p><u>Deadline to Complete</u></p> <ul style="list-style-type: none"> <li>➤ 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) <b>NA</b></li> <li>➤ 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 <b>NA</b></li> <li>➤ Documents/describes circumstances beyond control that prevent meeting deadlines <b>NA</b></li> <li>➤ If discharging to sediment or nutrient-impaired waters or Tier <del>2, 2.5</del> or 3 waters, completes stabilization (vegetative or non-vegetative) w/7 calendar days after temporary or permanent cessation <b>N</b></li> </ul> <p><i>Parts 7.2.10.3, 2.2.1, 3, 9.4.1.3</i></p> | Y                                     | <input type="checkbox"/> N | <p>But, Site Map details incorrectly stated, “<i>Disturbed portions of the site where construction activity has stopped for at least 21 days, shall be temporarily seeded. Additional information on Site Map stated, “These areas shall be seeded no later than 14 days form the last construction activity occurring (sic) these areas.”</i></p> |
| <p><b>Describes compliance with vegetative (final) stabilization criteria?</b></p> <ul style="list-style-type: none"> <li>➤ 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 <b>Y</b></li> <li>➤ 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 <b>Y</b></li> </ul> <p><i>Parts 7.2.10.3, 2.2.2.a, 3, 9.4.1.4</i></p>  | <input checked="" type="checkbox"/> Y | N                          |  |

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

|   |                                     |                                     |  |
|---|-------------------------------------|-------------------------------------|--|
| <p><b>If applicable, describes compliance with State of New Mexico, except Indian country, arid, semi-arid areas, or drought stricken option for final stabilization:</b></p> <ul style="list-style-type: none"> <li>➤ Area seeded/planted must w/3 yrs provides established vegetation that achieves 70% of the native background vegetative cover Y/N</li> <li>➤ Selects, designs, and installs non-vegetative erosion controls that provide cover for at least 3 years without active maintenance Y/N</li> <li>➤ Complies with notification, inspection maintenance, and reporting) Y/N</li> </ul> <p><i>Parts 7.2.10.3, 2.2.2.b, 3, 9.4.1.5</i></p> | Y                                   | N                                   | Not applicable / Plan does not describe if applicable or to be utilized.   |
| <p><b>If using, provides effective non-vegetative cover to stabilize?</b></p> <p><i>Parts 7.2.10.3, 2.2.2.2</i></p>   | <input checked="" type="checkbox"/> | N                                   |  |
| <b>Pollution Prevention Procedures</b>  |                                     | <b>Notes:</b>                       |  |
| <p><b>Describes procedures for <u>spill prevention and response</u>?</b></p> <p><i>Parts 7.2.11.1, 2.3.4</i></p>  | <input checked="" type="checkbox"/> | N                                   |  |
| <p><b>Describes procedures for <u>waste management</u>?</b></p> <p><i>Part 7.2.11.2, 2.3.3.3</i></p>  | <input checked="" type="checkbox"/> | N                                   |  |
| <p><b>Eliminates prohibited discharges?</b></p> <ul style="list-style-type: none"> <li>➤ Concrete washout, unless managed by control in Part 2.3.3.4 <b>Y</b></li> <li>➤ Washout/cleanout of stucco, paint, form release oils, curing compounds and other materials unless managed by control in Part 2.3.3.4 <b>Y</b></li> <li>➤ Fuels, oils or other from vehicle and equipment O&amp;M <b>Y</b></li> <li>➤ Soaps, solvents, or detergents used in vehicle and equipment washing <b>NA</b></li> <li>➤ Toxic or hazardous substances from spill/release <b>Y</b></li> </ul> <p><i>Part 2.3.1</i></p>   | <input checked="" type="checkbox"/> | N                                   |  |
| <p><b>Properly maintains and protects all pollution prevention controls?</b></p> <p><i>Part 2.3.2</i></p>   | <input checked="" type="checkbox"/> | N                                   |  |
| <p><b>Complies with pollution prevention standards for certain activities?</b></p> <ul style="list-style-type: none"> <li>➤ Fueling/maintenance of equipment or vehicles <b>N</b></li> <li>➤ Washing of equipment and vehicles <b>Y</b></li> <li>➤ Storage, handling, disposal of materials, products and waste <b>N</b></li> <li>➤ Washing applicators/containers <b>Y</b></li> </ul> <p><i>Part 2.3.3</i></p>   | Y                                   | <input checked="" type="checkbox"/> | Controls described, but were not updated to ensure compliance with all effluent limitations in Part 2 of 2012 CGP (e.g., described applicability of SPCC, use of drip pans, disposal, clean up immediately, do not hose down surfaces). Controls for asbestos waste not described. |
| <p><b>Minimizes discharge/complies with restrictions of <u>fertilizer application</u>?</b></p> <p><i>Part 2.3.5</i></p>   | Y                                   | N                                   | Not applicable / use of fertilizer not identified in SWPPP   |

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

| Inspections and Corrective Action  |        |                          |   |
|--|--------|--------------------------|---|
| <p><b>SWPPP describes procedures for <u>inspection, maintenance, and corrective action</u>?</b></p> <ul style="list-style-type: none"> <li>➤ Personnel conducting inspections <b>N</b></li> <li>➤ Inspection schedule <b>Not updated</b></li> <li>➤ Reduction of inspection frequency <b>NA</b>. As applicable:                             <ul style="list-style-type: none"> <li>○ location of the rain gauge or the address of weather station to obtain rainfall data Y/N/NA</li> <li>○ beginning and ending dates of the seasonally-defined arid period for your area or the valid period of drought Y/N/NA</li> <li>○ beginning and ending dates of frozen conditions Y/N/NA</li> </ul> </li> <li>➤ Inspection or maintenance checklists or other forms that will be used <b>Y</b></li> </ul> <p><i>Parts 7.2.12</i></p> | Y      | N                        | <p>SWPPP contained example inspection, rain event inspection and inspection guidance. Acknowledgement of training forms were not complete. Site map stated, “<i>all erosion and sedimentation control measures shall be checked by a qualified person at least once every seven days and within 24 hours of the end of a 0.5” rainfall event.</i>” SWPPP not updated for rainfall event definition change in 2012 CGP (previously 0.50, now 0.25 inches). Not updated for increased inspection frequency for sites with discharges to Tier 2 water.</p> |
| Inspections  | Notes: |                          |   |
| <p><b>Inspections performed by “qualified” person?</b></p> <p><i>Part 4.1.1</i></p>  | Y      | <input type="checkbox"/> | <p>Not documented (see previous training notes)</p>   |
| <p><b>Conducts inspections at a minimum of required frequency unless reductions documented?</b></p> <ul style="list-style-type: none"> <li>➤ Every 7 days or 14 days &amp; w/in 24 hrs of a 0.25” rain event <b>Not documented</b></li> </ul> <p><i>Part 4.1.2</i></p>   | Y      | <input type="checkbox"/> | <p>No written inspection reports contained in SWPPP, but corrective action log indicates 6 inspections were conducted. Logged inspection on 04/01/12 was 20 days, 04/18/12 was 17 days, 05/01/12 was 13 days, 05/15/12 was 14 days, and 06/04/12 was 20 days after previous inspection. Rain events (if any) not logged or recorded.</p>  |
| <p><b>If applicable, conducts increased inspection frequency for sites with discharges to sediment or nutrient-impaired waters or Tier <del>2, 2.5</del> or 3 waters:</b></p> <ul style="list-style-type: none"> <li>➤ Once every 7 days <b>N</b>; and</li> <li>➤ Within 24 hrs of a <math>\geq 0.25</math>” rain event <b>Not documented</b></li> </ul> <p><i>Parts 4.1.3, 3.3.2.1, 3.3.2</i></p>   | Y      | <input type="checkbox"/> | <p>In State of New Mexico, sediment and nutrient assessment protocols are not applicable to non-perennial waters. In this case, this assessment unit of Santa Fe River is listed as intermittent. As previously discussed, discharges are to an assessment unit of the Santa Fe River that may be a Tier 2 water. Reduction in inspection frequency was not documented.</p>   |
| <p><b>If allowable (begin/end dates recorded), documents reduced inspection frequency?</b></p> <ul style="list-style-type: none"> <li>➤ Stabilized area - 1/mo in areas where stabilization has been completed Y/N/NA</li> <li>➤ For arid/semi arid during seasonally dry period or drought-stricken areas - 1/mo and w/24 hrs of the occurrence of a storm event <math>\geq 0.25</math>” Y/N/NA</li> <li>➤ For frozen conditions (runoff unlikely, disturbance suspended, areas stabilized) - suspends until thawing conditions Y/N/NA</li> </ul> <p><i>Part 4.1.4.1 thru 3</i></p>   | Y      | N                        | <p>Reductions not described in SWPPP.</p>   |
| <p><b>Inspection areas includes:</b></p> <ul style="list-style-type: none"> <li>➤ All cleared, graded, excavated, and not completed stabilization Y/N</li> <li>➤ All controls/measures Y/N</li> <li>➤ Material/waste/borrow/equipment storage and maintenance areas Y/N</li> <li>➤ All areas stormwater typically flows Y/N</li> <li>➤ All points of discharge Y/N</li> <li>➤ All locations stabilization implemented Y/N/NA</li> </ul> <p><i>Part 4.1.5</i></p>   | Y      | <input type="checkbox"/> | <p>Not documented. No written inspection reports.</p>   |

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

|  |   |                            |  |
|--|---|----------------------------|--|
| <p><b>Inspection includes minimum requirements?</b></p> <ul style="list-style-type: none"> <li>➤ Controls installed/operational Y/N</li> <li>➤ Determines need to replace, repair, or maintain Y/N</li> <li>➤ Conditions that could lead to spills, leaks, and accumulations of pollutants Y/N</li> <li>➤ Identifies where new or modified controls are necessary Y/N</li> <li>➤ At points of discharge, checks for visible erosion/sedimentation on banks Y/N/NA</li> <li>➤ Identifies noncompliance Y/N</li> <li>➤ If discharge is occurring:             <ul style="list-style-type: none"> <li>○ Identifies all points of discharge Y/N</li> <li>○ Observes/documents visual quality, including color, odor, floating, settled, or suspended solids, foam, oil sheen, and other of pollutants Y/N</li> <li>○ Documents whether controls operating effectively, and describes controls not operating as intended or need maintenance Y/N</li> </ul> </li> <li>➤ Based on results of inspection, initiates corrective action under Part 5.</li> </ul> <p><i>Part 4.1.6</i></p> | Y | <input type="checkbox"/> N | Not documented. No written inspection reports. |
| <p><b>Inspection reports:</b></p> <ul style="list-style-type: none"> <li>➤ Completed within 24 hrs Y/N</li> <li>➤ Includes inspection date Y/N</li> <li>➤ Includes names/titles of personnel Y/N</li> <li>➤ Includes summary of findings Y/N</li> <li>➤ Includes applicable rain gauge reading Y/N/NA</li> <li>➤ Signed and certified in accordance with Appendix I.11 Y/N</li> </ul> <p><i>Part 4.1.7.1 and 2</i></p>   | Y | <input type="checkbox"/> N | No written inspection reports.                 |

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

| Corrective Action  |   |                            | Notes:  |
|--|---|----------------------------|---|
| <b>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?</b><br><i>Part 5</i>  | Y | <input type="checkbox"/> N | Identified corrective action was recorded to have been completed within 7 days. But, corrective action identified on 04/01/2012 and 05/01/2012 were not completed immediately or on the day of the inspection. Reason was not documented.   |
| <b>Within 24 hours of discovering the occurrence, completes a report of the following:</b> <ul style="list-style-type: none"> <li>➤ Condition identified Y/N</li> <li>➤ Nature of the condition identified Y/N</li> <li>➤ Date and time of the condition identified and how it was identified Y/N</li> </ul> <i>Part 5.4</i>   | Y | <input type="checkbox"/> N | Not documented. A corrective action log included columns for date, inspector name, description of BMP deficiency, corrective action needed (including planned date/responsible person); and date action taken/responsible person. But, it was not documented that corrective action report was completed within 24 hours. |
| <b>Within 7 calendar days of discovering the occurrence, completes a report of the following:</b> <ul style="list-style-type: none"> <li>➤ Follow-up actions taken to review the design, installation, and maintenance of stormwater controls, including the dates such actions occurred <b>N</b></li> <li>➤ Summary of stormwater control modifications taken or to be taken <b>Y</b></li> <li>➤ Schedule of activities necessary to implement changes <b>N</b></li> <li>➤ Date the modifications are completed or expected to be completed <b>Y</b></li> <li>➤ Notice of whether SWPPP modifications are required as a result of the condition identified or corrective action <b>N</b></li> <li>➤ Signed and certified in accordance with Appendix I.11 <b>N</b></li> </ul> <i>Parts 5.4.2, 5.4.3</i> | Y | <input type="checkbox"/> N |   |

| Additional Notes on SWPPP Review (optional)                                       |
|---|
| <p>NOI did not have</p> <p>Posted sign did not have 2012 CGP Tracking Number.</p> |

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

| <b>Implementation (complete in field)</b><br><i>(Narrative Description if Control Measures Installed, Operational, Effective and Maintained)</i> |   |
|--|---|
| <b>Erosion and Sediment Control Practices Part 2.1</b>   |   |
| <b>Minimize area of disturbance:</b>   | <i>(Provide brief description)</i><br><br>Not all portions of the property were disturbed—disturbance had been minimized. Trees to remain were protected with temporary fence.  |
| <b>Buffer compliance:</b>  | <i>(e.g., provide and maintain a 50-foot undisturbed natural buffer)</i><br><br>Not applicable  |
| <b>Perimeter controls:</b>   | <i>(e.g., filter berms, silt fences, temporary diversion dikes)</i><br><br>Silt fence surrounded portions of site as shown on site map.   |
| <b>Exit point or sediment track out:</b>   | <i>(e.g., aggregate stone with an underlying geotextile or non-woven filter fabric, or turf mats, wheel washing, rumble strips, plates, sweeping)</i><br><br>Accumulated sediment was observed in gravel pad at main construction entrance and maintenance appeared needed. Perimeter (access control) construction fence appeared to restrict vehicles to exit at gates. A second entrance for demolition/renovation waste removal did not have sediment track out controls. Some accumulated sediment was observed on the paved street at the second/northern entrance that had unprotected storm drain drop inlet grates. Site map was not updated for additional vehicle exit. On-site representative described sweeping measures to remove tracked out sediment on sidewalks and streets at the end of work day. |
| <b>Stockpiled sediment or soil:</b>  | <i>(e.g., berms, dikes, fiber rolls, silt fences, sandbag, gravel bags)</i><br><br>Some sediment stockpiles appeared to be actively or recently worked on the day of this inspection. Sediment stockpile areas were not indicated on site map.  |
| <b>Minimize dust:</b>  | <i>(e.g., application of water or other dust suppression techniques)</i><br><br>No substantial dust generation observed on day of this inspection.  |
| <b>Steep slopes:</b>   | <i>(e.g., standard erosion and sediment control practices, phasing disturbances, stabilization practices)</i><br><br>Steep slopes appeared to have grade toward interior of site. Tracking and slope preparation on south side of property was in progress.   |
| <b>Preserve topsoil:</b>   | <i>(e.g., stockpiling or transfer of topsoil to other locations)</i><br><br>Some excavated soil was stockpiled on site.   |
| <b>Soil compaction:</b>  | <i>(e.g., restrict vehicle / equipment use, soil conditioning techniques)</i><br><br>Although not described in SWPPP, there may be areas that vehicles/equipment could be restricted.   |

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

| <b>Erosion and Sediment Control Practices – Continued</b>   |   |
|---|---|
| <b>Storm drain inlet protection:</b>  | <p><i>(e.g., fabric filters, sandbags, concrete blocks, gravel barriers)</i></p> <p>Filter fabric and gravel barrier was installed at on-site storm sewer drop inlet. Small gaps at the edge of filter fabric were observed. Details for grated inlet control on site map stated, “The width, “W”, of the filter sack shall match the inside width of the grated inlet box.” Cleaning, additional fabric, and/or other measure appeared needed.</p> |
| <b>Conveyance channels:</b>   | <p><i>(e.g., erosion controls, and velocity dissipation check dams, sediment traps, riprap, or grouted riprap at outlets)</i></p> <p>No conveyance channels observed on site.</p>   |
| <b>Sediment basin:</b>  | <p><i>(e.g., outlet structures that withdraw from the surface, stabilization, erosion controls, velocity dissipation, kept at least ½ design capacity)</i></p> <p>No sediment basin observed on site at location shown on Site Map.</p>   |
| <b>Treatment chemicals:</b>   | <p><i>(e.g., spill berms, decks, spill containment pallets, storing chemicals in covered area, spill kit available on site)</i></p> <p>Treatment chemicals not observed.</p>  |
| <b>Dewatering:</b>  | <p><i>(e.g., sediment basins or sediment traps, sediment socks, dewatering tanks, tube settlers, weir tanks, or filtration systems (e.g., bag or sand filters) designed to remove sediment)</i></p> <p>No dewatering observed on site.</p>  |
| <b>Other erosion and sediment controls or practices:</b>  | <p><i>(Provide brief description)</i></p> <p>Straw wattle used at main entrance gate for run on control according to Permittee on-site representative. Portion of wattle was damaged. Addition of wattle was not updated on Site Map.</p>   |
| <b>Stabilization Practices Part 2.2</b>   |   |
| <b>Stabilization:</b>   | <p><i>(e.g., soil conditioning, application of seed or sod, planting of seedlings or other vegetation, application of fertilizer, watering, mulch, rolled erosion control products, control blankets, riprap, gabions, geotextiles)</i></p> <p>Some areas (i.e., sidewalks, pavement, areas around building) were not disturbed.</p>  |
| <b>Are stabilization measures initiated immediately? <b>NA</b> Are they completed within 14 days of construction cessation? <b>NA</b></b> | <p><i>(e.g. indicate “yes” or “no”; if not within 14 days of construction cessation, how long without stabilization measures?)</i></p> <p>No construction cessation documented. None observed.</p>  |

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

| <b>Pollution Prevention Measures Part 2.3</b>  |  |
|--|--|
| <b>Fueling and maintenance of vehicles:</b>  | <p><i>(e.g., locating activities away from surface waters and stormwater inlets or conveyances, providing secondary containment (e.g., spill berms, decks, spill containment pallets) and cover where appropriate, and/or having spill kits readily available)</i></p> <p>On-site fuel storage and fueling activities were located away from the stormwater inlet. Some secondary containment (low berm) was located around one fuel storage tank. Drums were located on pallet, but did not appear protected from vehicle traffic. Labeled used oil drum had been moved from secondary containment. Stains were observed on ground at fueling and fluid storage areas. Spilled materials need to be removed and properly disposed.</p>  |
| <b>Washing equipment &amp; vehicles:</b>   | <p><i>(e.g., locating activities away from surface waters, stormwater, inlets, conveyances, sediment basin or sediment trap, using filtration devices, such as filter bags or sand filters, plastic sheeting, temporary roofs)</i></p> <p>No washing of equipment or vehicles observed.</p>  |
| <b>Washing applicators/containers (e.g., stucco, paint, concrete, form release oils, curing compounds, and other construction materials)</b> | <p><i>(e.g., leak-proof container or pit, locate as far away as possible from surface waters, inlets or conveyances, designate areas)</i></p> <p>No washing observed. No active concrete pours observed. Concrete washout, date installed and removed, was not updated on site map.</p>  |
| <b>Pollution Prevention Measures – Continued</b>   |  |
| <b>Storage, handling, disposal of construction materials, products and waste:</b>  | <p><i>Building products (e.g., asphalt sealants, copper flashing, roofing materials, adhesives, concrete admixtures):</i></p> <p>Some storage of materials were sheltered (on-site building storage and semi containers). Tarps covered wood materials.</p>  |
|  | <p><i>Pesticides, herbicides, insecticides, fertilizers, and landscape materials:</i></p> <p>No pesticides, herbicides, insecticides, fertilizers storage observed on site.</p>  |
|  | <p><i>Diesel fuel, oil, hydraulic fluids, other petroleum products, and other chemicals:</i></p> <p>See notes above on fueling and maintenance of vehicles. Stains were below drum labeled as DOWTHERM* SR-1 Heat Transfer Fluid (contains ethylene glycol with additives). Drum was located in area that was difficult to inspect for leaks and spills.</p>   |
|  | <p><i>Hazardous or toxic waste (e.g, paints, solvents, petroleum-based products, wood preservatives, additives, curing compounds, acids):</i></p> <p>Storage of materials were sheltered (on-site building storage and semi containers).</p>   |
|  | <p><i>Construction and domestic waste (e.g., packaging materials, scrap construction materials, masonry products, timber, pipe and electrical cuttings, plastics, styrofoam, concrete, and other trash or building materials):</i></p> <p>No windblown trash was observed. Temporary construction (access control) perimeter fencing may provide some control to minimize windblown trash from leaving site. Except for one area, construction and domestic waste was in containers (asbestos was also bagged), but some containers did not have cover. Site map details stated, “<i>rubbish, trash, garbage, litter, or other such materials shall be deposited into sealed containers...</i>” In one area, added controls and/or removal of waste with top layer of soil may be needed. Wastes were not near property boundaries, but could become pollutant source during a rain event.</p> |

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

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|--|--|
|  | <p><i>Sanitary waste:</i></p> <p>Portable toilets were located away from vehicle traffic. Location of portable toilets was not updated on site map.</p>  |
| <b>Fertilizer application:</b>   | <p><i>(e.g., avoids applying before heavy rains, never applies to frozen ground, never applies to conveyance channels with flowing water)</i></p> <p>Fertilizer to establish vegetation was not observed.</p>  |
| <b>Miscellaneous</b>   |  |
| <b>Evidence of not allowable non-storm water discharges or prohibited discharge?</b> | <p><i>(Provide brief description and determine whether any non-storm water discharges allowable)</i></p> <p>None observed</p>  |
| <b>Evidence of sediment deposition to surface waters or MS4?</b>                     | <p><i>(e.g. significant turbidity observed in a receiving water body)</i></p> <p>Potential sediment deposition observed as discussed above. Some accumulated sediment observed on adjacent paved street with unprotected storm water sewer drop inlets. Gaps in on-site drop inlet protection also observed.</p> |

| <b>NMED/SWQB<br/>           Official Photograph Log<br/>           Photo # 1</b>                            |                  |                   |
|---|------------------|-------------------|
| Photographer: Erin Trujillo   | Date: 10/04/2012 | Time: 1442 hours  |
| City/County: Santa Fe / Santa Fe  |                  | State: New Mexico |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM                                     |                  |                   |
| Subject: Fiber mat at inlet control had accumulated sediment. Mat did not cover entire grate (gaps at edge) |                  |                   |



| <b>NMED/SWQB<br/>           Official Photograph Log<br/>           Photo # 2</b>   |                  |                   |
|--|------------------|-------------------|
| Photographer: Erin Trujillo  | Date: 10/04/2012 | Time: 1455 hours  |
| City/County: Santa Fe / Santa Fe   |                  | State: New Mexico |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM  |                  |                   |
| Subject: Some sediment tracking was observed at northern entrance used for waste/trash disposal pick up according to on-site representative. There was no sediment control measure observed for entrance at this location. |                  |                   |



| <b>NMED/SWQB<br/>           Official Photograph Log<br/>           Photo # 3</b>   |                  |                   |
|--|------------------|-------------------|
| Photographer: Erin Trujillo  | Date: 10/04/2012 | Time: 1457 hours  |
| City/County: Santa Fe / Santa Fe   |                  | State: New Mexico |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM  |                  |                   |
| Subject: Straw wattle at main entrance was damaged. Location of wattle was not shown on site map. Use of wattle at entrance was intended for run on control according to on-site representative. |                  |                   |



| <b>NMED/SWQB<br/>           Official Photograph Log<br/>           Photo # 4</b>   |                  |                   |
|--|------------------|-------------------|
| Photographer: Erin Trujillo  | Date: 10/04/2012 | Time: 1458 hours  |
| City/County: Santa Fe / Santa Fe   |                  | State: New Mexico |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM  |                  |                   |
| Subject: Sediment was observed on adjacent side walk outside construction site. No structural control measures were observed in this area. |                  |                   |



| <b>NMED/SWQB<br/>           Official Photograph Log<br/>           Photo # 5</b>   |                  |                   |
|--|------------------|-------------------|
| Photographer: Erin Trujillo  | Date: 10/04/2012 | Time: 1503 hours  |
| City/County: Santa Fe / Santa Fe   |                  | State: New Mexico |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM  |                  |                   |
| Subject: Use of shoots and dumpsters for renovation on lower floors was not practicable according to on-site representative. There were no additional controls to prevent debris from contaminating soils (e.g., tarps, immediate removal to containers). Waste was not near property boundaries on day of this inspection, but could be a source of pollution during a rain event. Photo also shows example of roll off with debris above top of container. |                  |                   |



| <b>NMED/SWQB<br/>           Official Photograph Log<br/>           Photo # 6</b>                                  |                  |                   |
|---|------------------|-------------------|
| Photographer: Erin Trujillo   | Date: 10/04/2012 | Time: 1521 hours  |
| City/County: Santa Fe / Santa Fe  |                  | State: New Mexico |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM   |                  |                   |
| Subject: Labeled used oil drum, with containers draining into drum, was not on pallet or inside containment area. |                  |                   |



| <b>NMED/SWQB<br/>           Official Photograph Log<br/>           Photo # 7</b>           |                  |                   |
|--|------------------|-------------------|
| Photographer: Erin Trujillo  | Date: 10/04/2012 | Time: 1522 hours  |
| City/County: Santa Fe / Santa Fe   |                  | State: New Mexico |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM                    |                  |                   |
| Subject: Arrows point to examples of staining near vehicle fueling and fluid storage area. |                  |                   |



| <b>NMED/SWQB<br/>           Official Photograph Log<br/>           Photo # 8</b>   |                  |                   |
|--|------------------|-------------------|
| Photographer: Erin Trujillo  | Date: 10/04/2012 | Time: 1523 hours  |
| City/County: Santa Fe / Santa Fe   |                  | State: New Mexico |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM  |                  |                   |
| Subject: Vehicle fluid storage (drums on pallets) did not have secondary containment and did not appear protected from equipment traffic (e.g., barriers). |                  |                   |



| NMED/SWQB<br>Official Photograph Log<br>Photo # 9   |                   |                  |
|---|-------------------|------------------|
| Photographer: Erin Trujillo   | Date: 10/04/2012  | Time: 1527 hours |
| City/County: Santa Fe / Santa Fe  | State: New Mexico |                  |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM                         |                   |                  |
| Subject: Example of dumpster, in this case special waste (asbestos), not indicated on site map. |                   |                  |



| NMED/SWQB<br>Official Photograph Log<br>Photo # 10   |                   |                  |
|--|-------------------|------------------|
| Photographer: Erin Trujillo  | Date: 10/04/2012  | Time: 1529 hours |
| City/County: Santa Fe / Santa Fe   | State: New Mexico |                  |
| Location: Drury Plaza Hotel Project, 228 East Palace Road, Santa Fe, NM                                    |                   |                  |
| Subject: Stain below drum labeled as DOWTHERM* SR-1 Heat Transfer Fluid (label not visible in this photo). |                   |                  |

