



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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Deputy Secretary

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

September 27, 2012

Mike Loftin, Executive Director
Homewise, Inc.
1301 Siler Road, Building D
Santa Fe, New Mexico 87507

RE: Construction Storm Water, SIC 1521, NPDES Compliance Evaluation Inspection, Homewise Inc. /
Piñon Ridge, NMR12A571, September 17 and 18, 2012

Mr. Loftin:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at a construction support activity site for which you may be an "operator" (see 2012 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 checklist section of the 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).

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

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

National Database Information		General	
Inspection Type	CEI	Inspector Name	Erin Trujillo
NPDES ID Number	NMR12A571	Telephone	505-827-0418
Inspection Date	09/17/2012, 09/18/2012	Entry Time	1220 hrs (9/17), 0840 hrs (9/18)
Inspector Type (circle one)	EPA <input type="checkbox"/> State <input type="checkbox"/> EPA Oversight	Exit Time	1720 hrs (9/17), 1050 hrs (9/18)
Facility Type (circle one)	Commercial / <input type="checkbox"/> Residential / Municipal / Industrial	Signature	/s/Erin S. Trujillo

Facility Location Information				
Name/Location/Mailing Address	Piñon Ridge subdivision, Las Estrellas community development, on Camino Francisca in northwest Santa Fe, New Mexico 87507			
Coordinates	Latitude	35.713056°	Longitude	-105.945556°
Receiving Waters	Unnamed tributaries and Santa Fe MS4 to unclassified Cañada Rincon thence Santa Fe River (Santa Fe WWTP to Nichols Reservoir) assessed unclassified segment 20.6.4.98 NMAC in the Rio Grand Basin			
Disturbed Area	30 acres	Start/Stop Dates	7/27/2011 to 12/31/2013	

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Homewise, Inc. / Owner, Developer & Builder	505-983-9473
Facility Contact	Rob Gibbs, Homewise, Inc.	505-983-9473
Authorized Official(s)	Mike Loftin, Homewise, Inc.	505-983-9473

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

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	N	SWPPP Prepared & Available? <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 type="checkbox"/> N
Notice Posted (visible, font large, NPDES Permit tracking#, contact name & phone #) <i>Part 1.5</i>	<input checked="" type="checkbox"/> Y	N	SWPPP Implementation Satisfactory?	Y	<input type="checkbox"/> N
	NMR12A571			NMR12A571	
NOI Date	05/06/2012		SWPPP Date	Not Complete	
Is NOI Satisfactory?	Y	<input type="checkbox"/> N			

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Additional Facility and Inspection Information (optional)

On August 17, 2012, a Compliance Evaluation Inspection (CEI) was conducted by Erin Trujillo, of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) at the approximately 33-acre (39 lot) Piñon Ridge single-family residential subdivision construction site in Santa Fe, New Mexico. This inspection followed an anonymous complaint concerning the condition of control measures at the site. A reconnaissance from public roadways was conducted by this inspector on 09/17/2012. The purpose of this inspection was to document the facility's status regarding the National Pollutant Discharge Elimination System (NPDES) storm water permit program and storm water regulations at 40 Code of Federal Regulations Part 122.26.

Upon arrival and entrance at approximately 1220 hours on 09/17/2012, the inspector contacted Rob Gibbs, Real Estate Development Manager, Homewise, Inc. by telephone and explained the purpose of the inspection. The inspector toured portions of the site along public right of ways until the arrival of an on-site representative of Homewise, Inc. The inspector made introductions, explained the purpose of the inspection, and presented credentials to Greg Powell, Construction Specialist, Homewise, Inc. The inspector, Mr. Powell and Luis Mossburg, Superintendent, Platinum Sky Construction LLC toured the construction site until approximately 1720 hours on the day of this inspection. The inspector returned to the site at approximately 0840 hours on 09/18/2012 to complete a review of the SWPPP, including any additional documentation and site map that the owner/operator made available. The inspector left the site at approximately 1050 hours on 08/18/2012.

This report is based on a review of the USEPA online notice of intent (eNOI) query, review of files maintained by NMED, on-site observation by NMED personnel, and verbal information provided by the Permittee and contractor on-site representatives. This report also includes an evaluation of documentation (portion of updated 2012 SWPPP and additional inspection reports) delivered to the inspector's office by Kelley Fetter, Stormco LLC at approximately 1300 hours on 09/18/2012. The inspector provided a preliminary summary of the findings to Mr. Fetter on 09/18/2012 in person and Mike Loftin, Executive Director, Homewise, Inc. by telephone on 09/19/2012.

A separate CEI was conducted at this same subdivision by this inspector on October 2, 2009, which at the time was owned by the previous owner/developer BT Homes Inc. (NPDES Tracking No. NMR15FR66, EPA CWA-06-2010, 1735 w/\$3500 penalty). According to the Permittee's on-site representative, Homewise, Inc. acquired the subdivision from Compass Bank on 07/25/2011. Vertical construction for a model home on Lot 11 of the subdivision was started by Homewise, Inc. on 02/27/2012.

Observed posted City of Santa Fe building permits at the site indicate Homewise, Inc. as the owner and Platinum Sky Construction LLC as the contractor. Homewise, Inc. has operational control over construction plans and specifications, including the ability to make modifications to those plans and specifications according to Permittee and on-site contractor representatives. The Permittee on-site representative described Homewise, Inc. as the owner/builder. SWPPP documentation indicated Homewise, Inc. as owner/operator and did not identify other site operators.

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SWPPP Review (can be completed in office)			
General	Notes:		
SWPPP Signed/Certified. Did all operators sign/certify the SWPPP? <i>Part 7.2.15, Appendix I.11</i>	Y	<input type="checkbox"/> N	Incomplete 2012 SWPPP made available on 09/18/2012 prepared 03/15/2012 by Kelly F. Fetter, StormCo LLC, Albuquerque, NM was not signed/certified by a responsible corporate officer or by a duly authorized representative of that person. On-site SWPPP prepared by Kelly F. Fetter, StormCo LLC signed by Robb Gibbs, Real Estate Development Manager on 08/11/2011 included delegation of authority language; but did not include unaltered certification language of the CGP.
SWPPP completed prior to NOI? <i>Part 7.1.1, Part 1.2.1</i>	Y	<input type="checkbox"/> N	Permittee's NOI (NMR12A571) submitted 05/06/2012 indicates SWPPP prepared in advance of filing. But, a complete, signed, certified, updated SWPPP prepared for the 2012 CGP was not made available.
Endangered Species Act. Does SWPPP include documentation supporting determination? <i>Part 7.2.14.1; Part 1.1.e, Appendix D</i>	Y	<input type="checkbox"/> N	NMR12A571 NOI certified under Criterion A, but listed bird and mammal species occur in Santa Fe County (see 2012 CGP Appendix D.2.2 Step 2 Determine if Likely to Occur). Incomplete 2012 SWPPP included distance to critical habitat, but not specific distance to listed species. It was not described how aerial photograph labeled "Endangered Species Map" was used to determine if species were likely to occur. <u>Comment:</u> SWPPP documentation would also not support a determination that activities are not likely to adversely affect listed species (previously Criterion E of 2008 CGP; now Steps 3 & 4, and Criterion C of the 2012 CGP).
Historic Properties. Does SWPPP include documentation supporting determination? <i>Part 7.2.14.2, Appendix E</i>	Y	<input type="checkbox"/> N	Incomplete 2012 SWPPP was not consistent with (did not support) NOI. Incomplete 2012 SWPPP indicated structures that had already been constructed/excavated, but NOI did not. Protected Entities Section referenced in 2012 SWPPP was not made available.
If applicable, documents contact with agency or office responsible for implementing Safe Drinking Water Act <u>underground injection control well(s)</u>? <i>Part 7.2.14.3, 40 CFR Parts 144 -147</i>	Y	N	Not Applicable
Post-Authorization Additions. Does SWPPP include: ➤ Copy of acknowledgement letter N ➤ Copy of NOI Y ➤ Copy of permit Y (2008) / N (2012) <i>Part 7.2.16.3</i>	Y	<input type="checkbox"/> N	Did not include 2012 CGP or 2012 acknowledgement.
If applicable, SWPPP describes compliance with any case-by-case basis USEPA imposed water quality-based effluent limitation requirements? <i>Part 3</i>	Y	N	Not Applicable

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<p>If discharge to an impaired water, includes records of all data used to complete NOI:</p> <ul style="list-style-type: none"> ➤ List of all impaired waters Y/N ➤ Pollutant(s) for which the surface water is impaired Y/N ➤ Whether a TMDL has been approved or established Y/N <p><i>Part 3.2.1, Appendix I.15</i></p>	Y	N	Not Applicable
<p>Required SWPPP modifications completed?</p> <ul style="list-style-type: none"> ➤ Completed w/7 days N ➤ Maintains modification records showing dates, name of person authorizing change and summary N ➤ Signed/Certified N ➤ Immediately notified other operators NA <p><i>Parts 7.4, 5.2.2, Appendix I.11.b</i></p>	Y	<input checked="" type="checkbox"/> N	
<p>Records Retention. Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires or is terminated?</p> <p><i>Parts 4.1.7, 5.4.4, Appendix I.10.2, I.15</i></p>	Y	<input checked="" type="checkbox"/> N	Complete 2012 SWPPP was not on site. On-site 2011 SWPPP contained inspection reports after 2012 CGP NOI submitted, but did not contain September 2012 inspection reports on 09/17/2012. Permittee on-site representative added reports to on-site SWPPP on 09/18/2012.

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Team & Activity Description			Notes:
<p>Identifies stormwater team personnel and responsibilities?</p> <ul style="list-style-type: none"> ➤ Personnel (by name or position) N ➤ Individual responsibilities N <p><i>Part 7.2.1</i></p>	Y	<input type="checkbox"/> N	<p>Team personnel responsible for daily or routine inspections (e.g., washouts, portable toilets) described in SWPPP were not identified. Inlet inspection and maintenance procedures on page 43 of incomplete 2012 SWPPP stated, “<i>material damage will be the decision of the Project Engineer,</i>” but a “Project Engineer” title was not listed. Incomplete 2012 SWPPP (Section 29.02) stated, “<i>Greg Powell is the person responsible for coordinating corrective action activities.</i>” However, Mr. Powell’s position is not listed as part of the team (Section 3.01 of the 2012 SWPPP).</p>
<p>Is staff training documented?</p> <ul style="list-style-type: none"> ➤ Training occurs prior to the commencement of earth-disturbing activities or pollutant-generating activities, whichever occurs first N ➤ Ensures following understand the requirements of this permit and their specific responsibilities: <ul style="list-style-type: none"> ○ Personnel responsible for the design, installation, maintenance, and/or repair of controls/measures N ○ Personnel responsible for the application and storage of treatment chemicals N ○ Personnel responsible for conducting inspections Y ○ Personnel responsible for taking corrective actions N ➤ At a minimum, training includes: <ul style="list-style-type: none"> ○ Location of all stormwater controls on the site required by this permit, and how maintained Not documented ○ Proper procedures to follow with respect to the permit’s pollution prevention requirements Not documented ○ When and how to conduct inspections, record applicable findings, and take corrective actions Not documented <p><i>Parts 7.2.13, 6 and permit notes for emergency-related construction activities</i></p>	Y	<input type="checkbox"/> N	<p>No training of owner/operator team personnel documented. <u>Comment:</u> If personnel of other contractors of Homewise, Inc. are identified as part of the stormwater team, for example, having responsibilities for routine maintenance inspections, re-installation, maintenance, repair of controls or measures, corrective action, and/or pollution prevention, then training of those personnel would be required.</p>
<p>Describes nature of construction activities?</p> <ul style="list-style-type: none"> ➤ Size of the property Y ➤ Total area to be disturbed Y ➤ Construction support activity areas Y ➤ Maximum area to be disturbed at any one time Y <p><i>Part 7.2.2</i></p>	<input checked="" type="checkbox"/> Y	N	
<p>If applicable, documents emergency-related projects?</p> <ul style="list-style-type: none"> ➤ Cause of public emergency Y/N ➤ Info substantiating occurrence (e.g., state disaster declaration or similar state or local declaration) Y/N ➤ Description of the construction necessary to reestablish effected public services Y/N <p><i>Parts 7.2.3, 1.2</i></p>	Y	N	Not Applicable

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<p>Identifies (lists) other site operators and areas of site over which each has control?</p> <p>➤ List and areas of site over which each has control N</p> <p><i>Part 7.2.4</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>Not updated to include operators of additional utility construction activities (e.g., in and adjacent to Cañada Rincon arroyo) within Piñon Ridge subdivision property boundaries.</p>
<p>Describes sequence, estimated dates (departures) and duration of construction activities?</p> <p>➤ Installation of control measures when operational N</p> <p>➤ Commencement/duration clearing & grubbing, mass grading, site preparation (excavating, cutting & filling), final grading, and creation of soil & vegetation stockpiles N</p> <p>➤ Cessation, temporarily or permanently, of construction activities on the site, or in designated portions of site N</p> <p>➤ Final/temporary stabilization areas of exposed soil N</p> <p>➤ Removal of temporary stormwater conveyances/channels and other stormwater control measures N</p> <p>➤ Removal of construction equipment and vehicles N</p> <p><i>Part 7.2.5</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>Some, but not all activities from Part 7.2.5 of 2012 CGP listed in incomplete 2012 SWPPP. Did not describe disturbance and installation of controls that occurred prior to owner/operator control of site. Estimated dates not completed, and referenced Contractor's Site Schedule was not included in SWPPP documentation. On-site Master Building Schedule for individual lots provided for review by the Permittee on-site representative did not include all activities in Part 7.2.5 of 2012 CGP.</p>

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Site Map			Notes:
Includes legible site map(s)? <i>Part 7.2.6</i>	Y	<input type="checkbox"/> N	Not updated/not complete.
<ul style="list-style-type: none"> ➤ Boundaries of the property Y ➤ Locations construction activities will occur N ➤ Locations earth-disturbing activities will occur (note any phasing) N ➤ Approximate slopes before and after major grading (note steep slopes) Y, but not steep ➤ Locations sediment, soil, or materials will be stockpiled N ➤ Locations of crossings of surface waters N ➤ Designated points vehicles exit onto paved roads N ➤ Locations of structures/impervious surfaces upon completion N ➤ Locations of construction support activity areas N <i>Part 7.2.6.1</i>	Y	<input type="checkbox"/> N	2011 SWPPP site map dated 09/14/2007 was not updated, but included boundaries required by the 2012 CGP. Copy of grading plan (sheets 12 C, D, E & F) dated 12/11/2006 and made available on 09/18/2012 included slopes and was annotated with location of check dams, but not all areas, controls, measures, and required information.
<ul style="list-style-type: none"> ➤ Locations of surface waters/wetlands, within or in immediate vicinity N ➤ Indicates waters listed as impaired, and Tier 2; Tier 2.5; or Tier 3 NA <i>Part 7.2.6.2</i>	Y	<input type="checkbox"/> N	
<ul style="list-style-type: none"> ➤ Boundary lines of natural buffers <i>Parts 7.2.6.3, 2.1.2.1a</i>	Y	<input type="checkbox"/> N	
<ul style="list-style-type: none"> ➤ Areas of federally-listed critical habitat for endangered or threatened species <i>Part 7.2.6.4</i>	Y	N	Not Applicable
<ul style="list-style-type: none"> ➤ Topography Y ➤ Existing vegetative cover N ➤ Drainage pattern of stormwater/authorized non-stormwater flow onto, over, and from site <u>before and after</u> major grading N <i>Part 7.2.6.5</i>	Y	<input type="checkbox"/> N	Topography and drainage was not legible on 2011 SWPPP site map. Drainage not shown for entire subdivision/property boundaries on copies of grading plan sheets.
<ul style="list-style-type: none"> ➤ Stormwater and allowable non-stormwater discharge locations N ➤ Locations of storm drain inlets on site and immediate vicinity N ➤ Locations stormwater or allowable non-stormwater will be discharged to surface waters (including wetlands) on or near site N <i>Part 7.2.6.6</i>	Y	<input type="checkbox"/> N	Inlets were difficult to locate on 2011 SWPPP site map due to map scale and were not otherwise called out. Copies of grading plan sheets did not show all inlets and curb breaks in immediate vicinity on Camino Francisca. Location of Cañada Rincon stream channel not shown or otherwise indicated.
<ul style="list-style-type: none"> ➤ Locations of potential pollutant-generating activities <i>Part 7.2.6.7, Part 7.2.7</i>	Y	<input type="checkbox"/> N	For example, maps provided did not include on-site equipment/material storage, concrete washout, and temporary fill stockpiles.
<ul style="list-style-type: none"> ➤ Locations of control measures <i>Part 7.2.6.8</i>	Y	<input type="checkbox"/> N	For example, maps provided did not include wattle at drop inlet btwn Lots 9 & 10 and above natural drainage channel of Lot 4; or inlet controls on streets.
<ul style="list-style-type: none"> ➤ Locations polymers, flocculants, or treatment chemicals will be used/stored <i>Part 7.2.6.9</i>	Y	<input type="checkbox"/> N	

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Construction Site Pollutants		Notes:
Includes pollutant-generating activities list and description? <i>Part 7.2.7.1</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Includes inventory of pollutants or constituents? ➤ Inventory Y ➤ Potential spills/leaks Y ➤ Departures from manufacturer’s specifications for applying fertilizers containing nitrogen & phosphorus NA <i>Parts 7.2.7.2, 2.3.5.1</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Identifies all sources of allowable non-stormwater discharges? <i>Parts 7.2.8, 1.3.d</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
If required (surface water w/50 feet of earth disturbance), documents and describes <u>buffer compliance alternative</u> selected? ➤ Ensures that all discharges from the area of earth disturbance to the natural buffer are first treated by the site’s erosion and sediment controls N ➤ Uses velocity dissipation devices, if necessary N ➤ Documents natural buffer width N ➤ Delineates, and clearly marks off, with flags, tape, or other similar marking device all natural buffer areas N ➤ Documents erosion and sediment control(s) used to achieve an equivalent sediment reduction N ➤ Documents any information relied upon to demonstrate equivalency N <i>Parts 7.2.9, 2.1.2, Appendix G</i>	Y <input checked="" type="checkbox"/> N	Documentation/description of buffer compliance alternative for unnamed tributaries and possibly Cañada Rincon was not complete. Referenced Engineering Section in 2012 SWPPP was not made available.
As applicable, describes and documents <u>buffer exceptions</u>? ➤ Describes rationale/why infeasible to provide and maintain an undisturbed natural buffer of any size N ➤ For linear project, describes buffer width retained and supplemental controls installed NA ➤ Small residential lot options Not documented ➤ Documents CWA Section 404 Permit, water-dependent structure/access disturbances N <i>Parts 7.2.9; 2.1.2.1e, Appendix G</i>	Y <input checked="" type="checkbox"/> N	Documentation/description of buffer exceptions was not complete and/or inconsistent with observations. Incomplete 2012 SWPPP appears to indicate that “ <i>it is infeasible to provide and maintain an undisturbed natural buffer of any size</i> ”, “ <i>operator will implement erosion and sediment controls that achieve the sediment load reduction equivalent to a 50-foot undisturbed natural buffer,</i> ” and “ <i>small residential lot exceptions are not applicable.</i> ” However, some lots include natural drainage easements that were partially undisturbed.

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All Stormwater Control Measures		Notes:
<p>Describes each measure?</p> <ul style="list-style-type: none"> ➤ Type of measure to be installed and maintained, including design information N ➤ Specific sediment controls installed and made operational prior to conducting earth-disturbing activities N ➤ For exit points, stabilization techniques and any additional controls planned to remove sediment prior to vehicle exit Y ➤ For linear projects (if applicable), where/why it has been determined that the use of perimeter controls is practicable NA <p><i>Part 7.2.10.1</i></p>	<p>Y</p> <p style="border: 1px solid black; padding: 2px; display: inline-block;">N</p>	<p>SWPPP documentation did not describe measures or controls installed prior to the owner/operator acquiring the site (e.g., silt fence as perimeter control, detention pond design). 2011 SWPPP site map had drawings (e.g., posting board, stabilized construction entrance, concrete washout). Incomplete 2012 SWPPP had photographs of some controls, but referenced drawings were not made available. Also, see notes below on stabilization.</p>
Erosion and Sediment Controls		Notes:
<p>Minimizes <u>area of disturbance</u>?</p> <p><i>Part 2.1.1.1</i></p>	<p>Y</p> <p style="border: 1px solid black; padding: 2px; display: inline-block;">N</p>	<p>SWPPP documentation did not describe controls to minimize disturbance in observed drainage easements and open space.</p>
<p>Describes erosion and sediment control <u>design requirements</u>?</p> <ul style="list-style-type: none"> ➤ Accounts for expected amount, frequency, intensity, duration of precipitation N ➤ Accounts for nature of run-on and run-off (channelized peak flow rates & total volume at outlet) N ➤ Accounts for range of soil particle sizes (distribution, erosivity and cohesiveness) Y ➤ Directs discharge to vegetated areas to increase sediment removal and infiltration unless infeasible N ➤ Uses velocity dissipation, if necessary N ➤ Complies with State of New Mexico except Indian country requirements: <ul style="list-style-type: none"> ○ Includes site-specific BMPs/controls designed to prevent to the maximum extent practicable an increase in sediment yield/flow velocity from pre-construction, pre-development conditions both during and after construction Y ○ 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) Not documented <p><i>Parts 2.1.1.2, 9.4.1.1</i></p>	<p>Y</p> <p style="border: 1px solid black; padding: 2px; display: inline-block;">N</p>	<p>SWPPP documentation did not describe accounts in design for precipitation and flow. SWPPP documentation did not describe velocity dissipation controls installed prior to owner/operator acquiring site. Incomplete 2012 SWPPP described site as having steep slopes and soils with 5 to 15% slope, but the RUSLE2 Worksheet Erosion Calculation Record (one page provided) did not include reasons for inputting an average slope steepness of 2.0%. Therefore, compliance with State of New Mexico soil loss model requirements may not be documented.</p>

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<p>Describes erosion and sediment control installation requirements?</p> <ul style="list-style-type: none"> ➤ Completes installation of downgradient stormwater/sediment controls by the time or immediately following earth-disturbance begins unless infeasible N (silt fence) ➤ Installs all other controls and makes operational as soon as conditions allow N (silt fence) ➤ Uses good engineering practices and follows manufacturer’s specifications or explain departures N (silt fence) <p><i>Part 2.1.1.3</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
<p>Describes erosion and sediment control maintenance requirements?</p> <ul style="list-style-type: none"> ➤ Initiates fix immediately and completed by close of next work day (routine maintenance) N ➤ Installs new measure/significant repair no later than 7 calendar days or document why infeasible Y <p><i>Part 2.1.1.4</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Also, did not describe maintenance schedules (including long term maintenance plan) for detention ponds constructed prior the owner/operator taking control of site (see State of New Mexico except Indian country conditions in Part 9.4.1.1 of 2012 CGP). See notes on perimeter controls below.
<p>Installs perimeter controls and describes maintenance (removes sediment before it has accumulated to 1/2 of the above-ground height)?</p> <p><i>Part 2.1.2.2</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Incomplete 2012 SWPPP did not describe silt fence observed on site.
<p>Minimizes sediment track-out?</p> <ul style="list-style-type: none"> ➤ Restricts vehicle use to properly designated exit points? N ➤ Uses appropriate stabilization techniques at all points that exit onto paved roads? N ➤ Where necessary, uses additional measures to remove sediment prior to exit? NA ➤ Removes tracked out sediment prior to the end of the same work day or if occurs on non-work day the next work day? Y <p><i>Part 2.1.2.3</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Not updated. Described control, but did not identify measures to be used at individual lot entrances onto paved roads.
<p>Controls discharges from stockpiled sediment or soil?</p> <ul style="list-style-type: none"> ➤ Locates piles outside of buffers Y ➤ Locates piles separate from stormwater controls Y ➤ Uses temporary sediment barrier Y ➤ Where practicable, provides cover or temporary stabilization Y ➤ Does not hose down or sweep into stormwater conveyance unless connected to basin, trap, etc. N ➤ Contains and securely protects pile from wind? Y <p><i>Part 2.1.2.4</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	General procedures described. But, did not include site specific information on soil piles or conveyances to ensure compliance with Part 2 of 2012 CGP.
<p>Minimizes dust?</p> <p><i>Part 2.1.2.5</i></p>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> Y <input type="checkbox"/> N	

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<p>Minimizes disturbance of <u>steep slopes</u>? Part 2.1.2.6</p>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<p><i>Comment:</i> Page 40 of updated 2012 SWPPP stated, “Generally, slopes that are steeper than 2.5:1 are slopes that meet the requirements of the 2012 CGP.” The meaning of this sentence is unclear and the source was not documented. A slope of 2.5:1 using a rise/run ratio = 250% grade. If one intended run over rise, then the grade would be 40%. Appendix A of the 2012 CGP defines steep slopes: “where a state, Tribe, local government, or industry technical manual (e.g., stormwater BMP manual) has defined what is to be considered a “steep slope”, this permit’s definition automatically adopts that definition. Where no such definition exists, steep slopes are automatically defined as those that are 15 percent or greater in grade.”</p>
<p>Preserves <u>topsoil</u>, unless infeasible? Part 2.1.2.7</p>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>Described stockpiling of top soil. But, did not include site specific information to ensure compliance with Part 2 of 2012 CGP or determine if feasible since site was disturbed before owner/operator acquired site.</p>
<p>Minimizes <u>soil compaction</u> where final vegetative stabilization or infiltration installed? Part 2.1.2.8</p>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>Described soil compaction measures, including conditioning, but did not include site specific information to determine if measures were intended to be used on this site. Incomplete 2012 SWPPP stated, “soil compaction should be minimized in areas where vegetation is the final stabilization method or where infiltration practices are employed...and the area to be vegetative should be marked.” Use of the word “should” did not appear to ensure compliance with Part 2 of 2012 CGP.</p>
<p>Protects <u>storm drain inlets</u> and describes maintenance requirements (removes sediment by the end of the same work day or end of the following work day)? Part 2.1.2.9</p>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>Described removal of sediment on paved streets at construction entrances. But, did not include measures to ensure accumulated sediment removal at inlets.</p>
<p>Describes <u>constructed conveyance channel</u> controls (if installed)? Part 2.1.3.1</p>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
<p>Describes <u>sediment basin</u> design (if installed) and maintenance (maintain at least ½ of capacity at all times)? Part 2.1.3.2</p>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>Small basins described, but there was a lack of site specific information to determine if measures were intended to be used. No site specific description (to prevent erosion and/or keep in effective operating condition) described for large detention basins constructed before owner/operator acquired site.</p>

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<p>Describes <u>treatment chemical</u> controls (if used)? <i>Part 2.1.3.3</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>Included inconsistent information on the use of treatment chemicals (e.g., polymers, flocculants, or other). Division 14 of 2012 SWPPP stated, “<i>chemical treatment is not employed as a BMP on this project.</i>” But, incomplete 2012 SWPP described dust and steep slope control measures that use spray chemical soil treatments (palliatives).</p>
<p>Includes documentation for use of <u>treatment chemicals</u> (polymers, flocculants, or other treatment chemicals)?</p> <ul style="list-style-type: none"> ➤ 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 N ➤ Lists all treatment chemicals and why the selection of these chemicals is suited to the soil characteristics N ➤ If authorized by EPA to use cationic treatment chemicals, includes the specific controls and implementation procedures designed to ensure use of cationic treatment chemicals will not lead to a violation of water quality standards NA ➤ Dosage/methodology to determine dosage N ➤ Information from any applicable MSDS N ➤ Schematic drawings of any chemically-enhanced or chemical treatment systems NA ➤ Description of how chemicals will be stored N ➤ References to applicable state or local requirements and copies of applicable manufacturer’s specifications N ➤ Description of training that personnel have received or will receive N <p><i>Parts 7.2.10.2, 2.1.3.3h</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
<p>Describes <u>dewatering</u> controls (if installed)? <i>Part 2.1.3.4</i></p>	Y	N	<p>Not Applicable/Not Expected on Project</p>

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Stabilization Requirements	Notes:		
<p>Describes compliance with deadlines for vegetative and/or non-vegetative stabilization practices, including exceptions?</p> <p><u>Deadline to Initiate</u></p> <ul style="list-style-type: none"> ➤ Initiates stabilization immediately (no later than end of next work day following earth-disturbing activities permanently/temporarily ceased) Y <p><u>Deadline to Complete</u></p> <ul style="list-style-type: none"> ➤ 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) N ➤ In arid, semi-arid or drought-stricken areas for permanent stabilization, immediately initiates, and within 14 calendar days completes non-vegetative stabilization measures to prevent erosion; and as soon as practicable completes all activities necessary to initially seed or plant; and documents beginning/ending dates of the seasonally dry period, site conditions, and schedule N ➤ Documents/describes circumstances beyond control that prevent meeting deadlines Not documented ➤ If discharging to sediment or nutrient-impaired waters or Tier 2^{2.5} or 3 waters, completes stabilization (vegetative or non-vegetative) wi/7 calendar days after temporary or permanent cessation NA <p><i>Parts 7.2.10.3, 2.2.1, 3, 9.4.1.3</i></p>	Y	<input type="checkbox"/> N	<p>Did not describe deadlines for areas disturbed by construction activities before owner/operator acquired site. References to Part 9.4.1.3 of the 2012 CGP included, but the specific language and measures to meet deadline requirements were not.</p>
<p>Describes compliance with vegetative (final) stabilization criteria?</p> <ul style="list-style-type: none"> ➤ 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 N ➤ Immediately after seeding or planting the area to be vegetatively stabilized, to the extent necessary to prevent erosion on the seeded or planted area, select, design, and install non-vegetative erosion controls that provide cover while vegetation is becoming established N <p><i>Parts 7.2.10.3, 2.2.2.a, 3, 9.4.1.4</i></p>	Y	<input type="checkbox"/> N	<p>Not documented. Best Management Section and specification and installation guide in RUSLE analysis and Soil Report Section referenced in incomplete 2012 SWPPP was not made available. It was not documented that all areas disturbed by construction activities would be stabilized</p>

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<p>If applicable, describes compliance with State of New Mexico, except Indian country, arid, semi-arid areas, or drought stricken option for final stabilization:</p> <ul style="list-style-type: none"> ➤ Area seeded/planted must w/3 yrs provides established vegetation that achieves 70% of the native background vegetative cover N ➤ Selects, designs, and installs non-vegetative erosion controls that provide cover for at least 3 years without active maintenance N ➤ Complies with notification, inspection maintenance, and reporting) Y <p><i>Parts 7.2.10.3, 2.2.2.b, 3, 9.4.1.5</i></p>	Y	<input type="checkbox"/> N	<p>Language from Part 2.2.2.1b of the 2012 CGP was quoted in incomplete 2012 SWPPP; but in Part 9.4.1.5 of the 2012 CGP, the language for final vegetative stabilization was replaced.</p>
<p>If using, provides effective non-vegetative cover to stabilize?</p> <p><i>Parts 7.2.10.3, 2.2.2.2</i></p>	Y	<input type="checkbox"/> N	<p>Incomplete 2012 SWPPP only lists “<i>Sprayed Water</i>” in table on page 52 for Site Stabilization Practice for Temporarily Ceased Activities. There was no documentation that identified measure would prevent erosion and sediment loss, or reduce or eliminate erosion until either final stabilization can be achieved or until further construction activities take place to re-disturb this area (see definition in Appendix A of the 2012 CGP). “<i>Detention pond</i>” was listed as a non-vegetative measure in table on page 54 of 2012 SWPPP; but stabilization of pond was not.</p>
Pollution Prevention Procedures		Notes:	
<p>Describes procedures for <u>spill prevention and response</u>?</p> <p><i>Parts 7.2.11.1, 2.3.4</i></p>	<input type="checkbox"/> Y	N	
<p>Describes procedures for <u>waste management</u>?</p> <p><i>Part 7.2.11.2, 2.3.3.3</i></p>	<input type="checkbox"/> Y	N	
<p>Eliminates prohibited discharges?</p> <ul style="list-style-type: none"> ➤ Concrete washout, unless managed by control in Part 2.3.3.4 Y ➤ Washout/cleanout of stucco, paint, form release oils, curing compounds and other materials unless managed by control in Part 2.3.3.4 N ➤ Fuels, oils or other from vehicle and equipment O&M Y ➤ Soaps, solvents, or detergents used in vehicle and equipment washing Y ➤ Toxic or hazardous substances from spill/release Y <p><i>Part 2.3.1</i></p>	Y	<input type="checkbox"/> N	
<p>Properly maintains and protects all pollution prevention controls?</p> <p><i>Part 2.3.2</i></p>	<input type="checkbox"/> Y	N	

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<p>Complies with pollution prevention standards for certain activities?</p> <ul style="list-style-type: none"> ➤ Fueling/maintenance of equipment or vehicles Y ➤ Washing of equipment and vehicles Y ➤ Storage, handling, disposal of materials, products and waste Y ➤ Washing applicators/containers Y Concrete / N other <i>Part 2.3.3</i> 	Y	<input type="checkbox"/> N	Described concrete washout controls, but not specific controls or measures for other types of washout or cleanout (e.g., stucco, paints) listed as potential pollutants on page 55 of incomplete 2012 SWPPP.
<p>Minimizes discharge/complies with restrictions of fertilizer application? <i>Part 2.3.5</i></p>	Y	N	Not Applicable (Incomplete 2012 SWPPP indicated that fertilizer is not planned for use)

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Inspections and Corrective Action		
<p>SWPPP describes procedures for <u>inspection, maintenance, and corrective action</u>?</p> <ul style="list-style-type: none"> ➤ Personnel conducting inspections Y ➤ Inspection schedule Y ➤ Reduction of inspection frequency NA ➤ As applicable: <ul style="list-style-type: none"> ○ location of the rain gauge or the address of weather station to obtain rainfall data Y ○ beginning and ending dates of the seasonally-defined arid period for your area or the valid period of drought NA ○ beginning and ending dates of frozen conditions NA ➤ Inspection or maintenance checklists or other forms that will be used Y <p><i>Parts 7.2.12</i></p>	<input checked="" type="checkbox"/>	N
Inspections	Notes:	
<p>Inspections performed by “qualified” person?</p> <p><i>Part 4.1.1</i></p>	<input checked="" type="checkbox"/>	N
<p>Conducts inspections at a minimum of required frequency unless reductions documented?</p> <ul style="list-style-type: none"> ➤ Every 7 days <u>or</u> 14 days & w/in 24 hrs of a 0.25” rain event N <p><i>Part 4.1.2</i></p>	Y	<p><input checked="" type="checkbox"/> Since Permittee’s NOI (NMR12A571) submitted, the inspection on 06/01/12 was 28 days after the previous inspection on 05/13/12. The inspection on 07/13/12 was 15 days after the previous inspection 06/28/12. The day of the rain event was not recorded on inspection reports or otherwise contained in SWPPP documentation; therefore, it was not documented that inspections were within 24 hours of a 0.25” rain event. Rain events of 0.25” or greater were recorded 4 times after inspection on 06/01/12.</p>
<p>If applicable, conducts increased inspection frequency for sites with discharges to sediment or nutrient-impaired waters or Tier 2, 2.5 or 3 waters:</p> <ul style="list-style-type: none"> ➤ Once every 7 days N; <u>and</u> ➤ Within 24 hrs of a ≥ 0.25” rain event Y/N? <p><i>Parts 4.1.3, 3.3.2.1, 3.3.2</i></p>	Y	N
<p>If allowable (begin/end dates recorded), documents reduced inspection frequency?</p> <ul style="list-style-type: none"> ➤ Stabilized area - 1/mo in areas where stabilization has been completed Y/N/NA ➤ For arid/semi arid during seasonally dry period or drought-stricken areas - 1/mo and w/24 hrs of the occurrence of a storm event ≥ 0.25” Y/N/NA ➤ For frozen conditions (runoff unlikely, disturbance suspended, areas stabilized) - suspends until thawing conditions Y/N/NA <p><i>Part 4.1.4.1 thru 3</i></p>	Y	N

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<p>Inspection areas includes:</p> <ul style="list-style-type: none"> ➤ All cleared, graded, excavated, and not completed stabilization Not documented ➤ All controls/measures Not documented ➤ Material/waste/borrow/equipment storage and maintenance areas Y ➤ All areas stormwater typically flows Not documented ➤ All points of discharge Not documented ➤ All locations stabilization implemented N <p><i>Part 4.1.5</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
<p>Inspection includes minimum requirements?</p> <ul style="list-style-type: none"> ➤ Controls installed/operational Y ➤ Determines need to replace, repair, or maintain Y ➤ Conditions that could lead to spills, leaks, and accumulations of pollutants Y ➤ Identifies where new or modified controls are necessary N ➤ At points of discharge, checks for visible erosion/sedimentation on banks N ➤ Identifies noncompliance N ➤ If discharge is occurring: Not documented <ul style="list-style-type: none"> ○ Identifies all points of discharge Y/N ○ Observes/documents visual quality, including color, odor, floating, settled, or suspended solids, foam, oil sheen, and other of pollutants Y/N ○ Documents whether controls operating effectively, and describes controls not operating as intended or need maintenance Y/N ➤ Based on results of inspection, initiates corrective action under Part 5. N <p><i>Part 4.1.6</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>For example, the inspection on 09/11/12 conducted 6 days prior to this CEI indicated that stabilized construction entrances are “N/A,” but lot entrances under construction did not have track out controls. Inspection report indicated that additional BMPs needed, (silt fence per plan), but not where. Also, inspection report indicated that site was not ready for permanent stabilization, but areas disturbed by construction activities (e.g., detention ponds) were not stabilized. Reports did not document whether or not discharge was occurring. Some, but not all, identified needs for corrective action, were initiated immediately. See corrective action notes below.</p>
<p>Inspection reports:</p> <ul style="list-style-type: none"> ➤ Completed within 24 hrs N ➤ Includes inspection date Y ➤ Includes names/titles of personnel Y ➤ Includes summary of findings Y ➤ Includes applicable rain gauge reading N ➤ Signed and certified in accordance with Appendix I.11 N <p><i>Part 4.1.7.1 and 2</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>Printed e-mails sent 09/17/2012, did not document that the three inspection reports for September 2012 were completed within 24 hours. Print out of same inspection reports did not have date and time of completion (sign/certified). Incomplete 2012 SWPPP stated, “A rain gauge is located on the posting board for the project.” A rain gauge was not observed on the posting board. Daily logs of rain gauge information were not included on inspection reports or otherwise documented. Delegation of authority was not signed/certified in accordance with Appendix I.11 It was also noted that the e-mailed report of the 08/09/12 inspection did have electronic image signature. Incomplete 2012 SWPPP did not include procedures to ensure compliance with Part I.11.5 of the 2012 CGP which states, “...such signatures must meet the same signature, authentication, and identity-proofing standards set forth at 40 CFR § 3.2000(b) for electronic reports (including robust second-factor authentication).”</p>

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Corrective Action			Notes:
<p>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?</p> <p><i>Part 5</i></p>	Y	<input type="checkbox"/> N	<p>Corrective action to repair or replace controls were not initiated immediately. For example, the 07/27/12 10:45 am inspection report indicated that inlet protection needed to be cleaned and reset; and silt fence needed to be installed. The 08/09/12 9:00 am inspection report indicated the need to clean inlet protection and sweep entrance; and that there were locations where additional BMPs are necessary (in this case the inspection report did not document the BMP or location). The 08/23/12 11:15 am inspection report indicated that concrete washout (clean and remove contaminated soil), inlet protection (clean and reset), and sweeping was needed. The 08/23/12 also listed past due maintenance required from the 08/09/12 inspection. Items still needing maintenance from 08/09/12 (clean inlet protection, sweep entrance), and from 08/23/12 concrete washout clean and remove contaminated soil were listed on the 09/06/12 12:00 pm inspection following a recorded 0.02” rain event, 09/11/12 8:00 am inspection following a recorded 0.25” rain event; and 09/13/12 7:30 am inspection following a recorded 0.65” rain event. The 09/06, 09/11 and 09/13/12 inspection reports indicate there are locations where additional BMPs are necessary (09/06/12 12:00 pm inspection report stated, “<i>silt fence still isn’t reinstalled</i>”; and the 09/11 and 09/13/12 inspection reports stated, “<i>silt fence per plan.</i>”).</p>
<p>Within 24 hours of discovering the occurrence, completes a report of the following:</p> <ul style="list-style-type: none"> ➤ Condition identified <input type="checkbox"/> N ➤ Nature of the condition identified <input type="checkbox"/> N ➤ Date and time of the condition identified and how it was identified <input type="checkbox"/> N <p><i>Part 5.4</i></p>	Y	<input type="checkbox"/> N	<p>Printed e-mails sent 09/17/2012, did not document that the three inspection reports for September 2012 were completed within 24 hours.</p>
<p>Within 7 calendar days of discovering the occurrence, completes a report of the following:</p> <ul style="list-style-type: none"> ➤ Follow-up actions taken to review the design, installation, and maintenance of stormwater controls, including the dates such actions occurred Y/N ➤ Summary of stormwater control modifications taken or to be taken Y/N ➤ Schedule of activities necessary to implement changes Y/N ➤ Date the modifications are completed or expected to be completed Y/N ➤ Notice of whether SWPPP modifications are required as a result of the condition identified or corrective action Y/N ➤ Signed and certified in accordance with Appendix I.11 Y/N <p><i>Parts 5.4.2, 5.4.3</i></p>	Y	<input type="checkbox"/> N	<p>Follow-up does not appear have been taken, and report completed for repeated non-compliance of required maintenance in Part 2 of the CGP.</p>

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Additional Notes on SWPPP Review *(optional)*

Additional Comments on Notice of Intent: Permittee's NOI (NMR12A571) indicated that there was no municipal separate storm sewer system (MS4). Updated 2012 SWPPP indicated project/site discharges to Santa Fe small MS4. Discharges are not authorized if your NOI is incomplete or inaccurate. If after submitting NOI, there is a need to correct or update any fields, one may do so by submitting a paper modification form, which can be obtained at the following link: http://www.epa.gov/npdes/pubs/cgp_modify.pdf

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Implementation (complete in field) <i>(Narrative Description if Control Measures Installed, Operational, Effective and Maintained)</i>	
Erosion and Sediment Control Practices Part 2.1	
Minimize area of disturbance:	<p><i>(Provide brief description)</i></p> <p>Subdivision has designated drainage easements on ephemeral streams (arroyos) for some lots and open space, but areas were not delineated with flag, tape or other controls.</p>
Buffer compliance:	<p><i>(e.g., provide and maintain a 50-foot undisturbed natural buffer)</i></p> <p>Natural buffer (drainage easements) on some lots were not delineated with flag, tape or other controls; and structural controls were damaged, uninstalled or gaps were observed (see perimeter controls).</p>
Perimeter controls:	<p><i>(e.g., filter berms, silt fences, temporary diversion dikes)</i></p> <p>Raised curbs act as perimeter controls in some areas. Silt fence and/or wattle had not been re-installed in some areas. Gaps in structural control measures (silt fence rolled up) observed along Camino Francisca, Lot 36, and along Placita de Luna adjacent to the Cañada Rincon natural buffer. Utility relocation within the property boundaries of the subdivision had occurred in the natural buffer along Cañada Rincon. According to the on-site representative, following a utility accident/fire on 08/08/2012, the Permittee considered access to the area around Placita de Luan adjacent to Cañada Rincon natural buffer restricted by investigations and follow up activities by the utility contractor until 8/31/2012.</p> <p>Velocity dissipation (rock gabions) were covered with sediment, but existed below culvert outlets at the natural buffer of Cañada Rincon. The sediment detention pond adjacent to the natural buffer of Cañada Rincon (north/east corner of the site) had a concrete spill way.</p>
Exit point or sediment track out:	<p><i>(e.g., aggregate stone with an underlying geotextile or non-woven filter fabric, or turf mats, wheel washing, rumble strips, plates, sweeping)</i></p> <p>Exit points along Camino Francisca were paved. However, there were no sediment track out controls for driveways cuts of un-stabilized lots that exit onto paved roads in the subdivision. Vehicles also accessed lot under construction from a raised curbs. Accumulated sediment was observed on paved roads within the subdivision and along Camino Francisca.</p>
Stockpiled sediment or soil:	<p><i>(e.g., berms, dikes, fiber rolls, silt fences, sandbag, gravel bags)</i></p> <p>Stockpiles were located separate from controls and were not “contained within temporary perimeter sediment barriers, such as wattles, dikes, silt fences” as described in incomplete 2012 SWPPP. No temporary stabilization observed or documented. Straw wattle downgradient of stockpiles on Lot 29 was damaged.</p>

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Minimize dust:	<p><i>(e.g., application of water or other dust suppression techniques)</i></p> <p>Use of water to control dust was observed during grading activities on Lot 8. No substantial dust generation observed (see non-stormwater notes below).</p>
Steep slopes:	<p><i>(e.g., standard erosion and sediment control practices, phasing disturbances, stabilization practices)</i></p> <p>Use of controls for steep slopes as described in incomplete 2012 SWPPP was not observed.</p>
Preserve topsoil:	<p><i>(e.g., stockpiling or transfer of topsoil to other locations)</i></p> <p>Site was disturbed before owner/operator acquired site. No topsoil stockpiles were signed or otherwise delineated.</p>
Soil compaction:	<p><i>(e.g., restrict vehicle / equipment use, soil conditioning techniques)</i></p> <p>No signs to restrict vehicles/equipment observed.</p>
Storm drain inlet protection:	<p><i>(e.g., fabric filters, sandbags, concrete blocks, gravel barriers)</i></p> <p>Fabric filters and straw wattle observed at street drop inlets. No wattle as described in incomplete 2012 SWPPP observed at drop inlet in conveyance between Lot 12 and 13.</p>
Conveyance channels:	<p><i>(e.g., erosion controls, and velocity dissipation check dams, sediment traps, riprap, or grouted riprap at outlets)</i></p> <p>Silt fence check dams were observed in conveyance channel to drop inlet between Lot 12 and 13. One rock check dam with damaged silt fence was not maintained. Observed culvert outlets had velocity dissipation (rock gabions).</p>
Sediment basin:	<p><i>(e.g., outlet structures that withdraw from the surface, , kept at least ½ design capacity)</i></p> <p>The northern basin outlet structure had a spill way. The two other outlets did not withdraw water from the surface, but through culverts with outlets in the natural buffer and to a channel thence to Cañada Rincon. Sediment was observed accumulated at the basin outlet culverts. Erosion rills and bare spots were observed on the side slopes of the two detention ponds along Camino Francisca.</p>

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Erosion and Sediment Control Practices - Continued	
Treatment chemicals:	<p><i>(e.g., spill berms, decks, spill containment pallets, storing chemicals in covered area, spill kit available on site)</i></p> <p>No use or storage of treatment chemicals observed.</p>
Dewatering:	<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.</p>
Other erosion and sediment controls or practices:	<p><i>(Provide brief description)</i></p> <p>Erosion and sediment check dams were noted to have been installed on 8/10 and removed on 4/12 on copies of drainage plan sheets. Although utility work appeared complete, some control measures had not been re-installed in drainage easement along Luna Vista, and along Placita de Luna.</p> <p>Damaged compost (mulch) socks and some filter bags not maintained littered the site and/or were not disposed as described in the incomplete 2012 SWPPP. When no longer required for the intended purpose, the SWPPP stated, “<i>netting shall be gathered and disposed....</i>” No locations of mulch socks in permanent erosion control application were documented on site maps.</p>
Stabilization Practices Part 2.2	
Stabilization:	<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>Subdivision streets were paved. Retaining walls observed. Some lots had final stabilization, in this case landscape rock and geotextiles.</p>
Are stabilization measures initiated immediately? N Are they completed within 14 days of construction cessation? N	<p><i>(e.g. indicate “yes” or “no”; if not within 14 days of construction cessation, how long without stabilization measures?)</i></p> <p>Final stabilization of areas disturbed by construction activities for the subdivision, including detention ponds, before owner/operator acquired site on 07/25/2011 or other areas re-disturbed were not initiated. Initiation of temporary stabilization (vegetative or non-vegetative controls) of ready to build lots that were not actively under construction had not been conducted.</p>
Pollution Prevention Measures Part 2.3	
Fueling and maintenance of vehicles:	<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>No fueling or maintenance of vehicles; or spills observed.</p>

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Washing equipment & vehicles:	<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; or on-site storage of soaps, detergents, or solvents observed.</p>
Washing applicators/containers (e.g., stucco, paint, concrete, form release oils, curing compounds, and other construction materials)	<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>Concrete washout practices did not appear to provide an effective means of eliminating discharge. A concrete washout container was located in a fenced area in Lot 29, but the area was not signed. Not all concrete washing had entered the container. The container did not appear to be leak-proof and washout was observed behind the container. The concrete wash container observed was not consistent with installation information in SWPPP documentation. Concrete and/or other material compounds were observed on the ground at Lot 36 which is adjacent to the remaining portions of the natural buffer along Cañada Rincon .</p>
Storage, handling, disposal of construction materials, products and waste:	<p><i>Building products (e.g., asphalt sealants, copper flashing, roofing materials, adhesives, concrete admixtures):</i></p> <p>No sheltered areas or practices observed. No spills or leaks observed.</p>
	<p><i>Pesticides, herbicides, insecticides, fertilizers, and landscape materials:</i></p> <p>None observed.</p>
	<p><i>Diesel fuel, oil, hydraulic fluids, other petroleum products, and other chemicals:</i></p> <p>No sheltered areas or practices observed. No spills or leaks observed.</p>
	<p><i>Hazardous or toxic waste (e.g, paints, solvents, petroleum-based products, wood preservatives, additives, curing compounds, acids):</i></p> <p>No designated sheltered areas or secondary containment observed. No spills or leaks observed.</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>As previously discussed, damaged BMPs littered site. No domestic waste (trash or litter) was observed, except on the ground of the open containers (roll offs) for trash and recycled construction materials in fenced area on Lot 29. Pallets were above the top of one of the containers, but the containers were not overflowing. Signs for the containers were difficult to read and needed to be re-labeled. Container lids described in 2012 SWPPP were not observed.</p>

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	<p><i>Sanitary waste:</i></p> <p>Portable toilets located in a drainage easement and one located on Lot 36 adjacent to remaining portions of natural buffer along Cañada Rincon did not appear to be secured to prevent being topped or knocked over; and did not have containment measures (e.g., compost sock or earth berm) described in SWPPP documentation.</p>
Fertilizer application:	<p>(e.g., avoids applying before heavy rains, never applies to frozen ground, never applies to conveyance channels with flowing water)</p> <p>Use of fertilizer not described in SWPPP. None observed.</p>
Miscellaneous	
Evidence of not allowable non-storm water discharges or prohibited discharge?	<p><i>(Provide brief description and determine whether any non-storm water discharges allowable)</i></p> <p>Allowable non-stormwater discharges to MS4 (leaks from watering truck used to control dust during grading activities on Lot 8, from the top of Luna Vista, continued along paved surfaces and gutter to drop inlets on Luna Vista)</p> <p>Concrete washout and other clean out did not appear to be managed by controls in Part 2 of 2012 CGP; but no evidence of concrete washout discharges observed on the day of this inspection.</p>
Evidence of sediment deposition to surface waters or MS4?	<p><i>(e.g. significant turbidity observed in a receiving water body)</i></p> <p>Accumulated sediment and gaps between straw wattle and drop inlet in MS4 observed. Sediment accumulation was observed in detention pond culvert outlets that continue/cross under Camino Francisca to tributary of Cañada Rincon. Tributary and Cañada Rincon were not flowing on the day of this inspection.</p>

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1240 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Detention pond (labeled 5D-1) in subdivision constructed before owner/operator acquired site. Bare spots on side slopes not stabilized.		



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1240 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Accumulated sediment in culvert outlet of detention pond shown in previous photo. Flow from outlet of this pond is to unnamed tributary thence to Cañada Rincon.		



NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1245 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Example of accumulated sediment on Luna Vista at drop inlet control. Filter bags littered area. Disturbed slope not stabilized.		



NMED/SWQB Official Photograph Log Photo # 4		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1250 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Example of accumulated sediment at Placita de Luna and Camino Francisca.		



NMED/SWQB Official Photograph Log Photo # 5		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1255 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Example of disturbed area on slope above retaining wall along Placita de Luna that was not stabilized.		



NMED/SWQB Official Photograph Log Photo # 6		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1256 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Detention pond (labeled 5D-2) between Placita De Luna loop entrances. Erosion rills observed and bare spots on side slopes not stabilized. Flow from outlet of this pond would be to natural buffer of Cañada Rincon.		



NMED/SWQB Official Photograph Log Photo # 7		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1257 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Example of rolled up silt fence, in this case, along perimeter of subdivision and Camino Francisca.		



NMED/SWQB Official Photograph Log Photo # 8		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1258 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Filter bag did not appear to be used/installed littered site. Some sediment in gutter along Placita de Luna.		



NMED/SWQB Official Photograph Log Photo # 9		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1556 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Unmaintained rock and damaged silt fence check dam at end of natural drainage channel near Avenida de Luna Cul de Sac near Lot 19.		



NMED/SWQB Official Photograph Log Photo # 10		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1558 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Small diameter rock at location where vehicles access lot under construction did not appear sufficient in size or quantity to prevent/minimize vehicle track out onto Luna Vista. Some sediment was observed on paved street.		



NMED/SWQB Official Photograph Log Photo # 11		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1611 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Example of bare un-stabilized area in drainage easement of completed Lot 11 (Model Home).		



NMED/SWQB Official Photograph Log Photo # 12		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1611 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: No inlet control measures at grate as described/shown in SWPPP documentation. Wattle and silt fence were damaged and did not protect inlet. Rills observed on side slopes.		



NMED/SWQB Official Photograph Log Photo # 13		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1612 hours
City/County: Santa Fe / Santa Fe	State: New Mexico	
Location: Piñon Ridge		
Subject: Gap of control measures in disturbed area above unnamed tributary. Arrow points to silt fence that is folded back at gap. No containment or anchor controls described in SWPPP documentation observed for portable toilet.		



NMED/SWQB Official Photograph Log Photo # 14		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1613 hours
City/County: Santa Fe / Santa Fe	State: New Mexico	
Location: Piñon Ridge		
Subject: Example of gap at wattle and drop inlet. Filter bag on top of wattle did not appear sufficient to keep wattle in place and minimize sediment from entering inlet. Sediment is wet from allowable non-stormwater discharge.		



NMED/SWQB Official Photograph Log Photo # 15		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1616 hours
City/County: Santa Fe / Santa Fe	State: New Mexico	
Location: Piñon Ridge		
Subject: Example of damaged filter bag/wattle littering site.		



NMED/SWQB Official Photograph Log Photo # 16		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1617 hours
City/County: Santa Fe / Santa Fe	State: New Mexico	
Location: Piñon Ridge		
Subject: Concrete washout on ground in front of washout container. Litter and debris around uncovered trash and recycle roll offs. Signs for recycling difficult to read, especially from distance. No sign for washout observed.		



NMED/SWQB Official Photograph Log Photo # 17		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1618 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Concrete washout on ground behind washout container.		



NMED/SWQB Official Photograph Log Photo # 18		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1621 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Temporary fill stockpiles and accumulated sediment along Avenida de Luna. No track out controls from un-stabilized areas at driveway curb cuts to paved street observed.		



NMED/SWQB Official Photograph Log Photo # 19		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1622 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Fill stockpile and erosion rill toward driveway curb cut at paved street. No track out controls observed.		

Erosion rill



NMED/SWQB Official Photograph Log Photo # 20		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1637 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Example of un-stabilized bare area and damaged un-staked straw wattle below soil stockpiles on Lot 29. Other control measures in this area (not shown in photo) appeared undamaged and functioning.		



NMED/SWQB Official Photograph Log Photo # 21		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1647 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Example of damaged un-staked straw wattle above unnamed tributary in drainage easement.		



Erosion rill above unnamed tributary in drainage easement

NMED/SWQB Official Photograph Log Photo # 22		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1657 hours
City/County: Santa Fe / Santa Fe		State: New Mexico
Location: Piñon Ridge		
Subject: Example of un-stabilized fill and slope, in this case on north side of Lot 35 and 36 adjacent to open space and northeast detention pond (not shown in photo). Arrow points to rolled up silt fence.		



Erosion rill

NMED/SWQB Official Photograph Log Photo # 23		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1700 hours
City/County: Santa Fe / Santa Fe	State: New Mexico	
Location: Piñon Ridge		
Subject: Un-stabilized fill slope on Lot 36 adjacent to open space and natural buffer along Cañada Rincon. No installed perimeter controls existed below slope.		



NMED/SWQB Official Photograph Log Photo # 24		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1702 hours
City/County: Santa Fe / Santa Fe	State: New Mexico	
Location: Piñon Ridge		
Subject: Arrow points to rolled up silt fence adjacent to open space and natural buffer along Cañada Rincon		

Erosion Rill



NMED/SWQB Official Photograph Log Photo # 25		
Photographer: Erin Trujillo	Date: 09/17/2012	Time: 1703 hours
City/County: Santa Fe / Santa Fe	State: New Mexico	
Location: Piñon Ridge		
Subject: Concrete and/or other chemical product cleanout in southeast corner of Lot 36 adjacent to open space and natural buffer along Cañada Rincon. Arrow points to example rolled up silt fence.		

