



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



Surface Water Quality Bureau

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Resource Protection Division**

Certified Mail - Return Receipt Requested

June 10, 2013

Mr. Mike Silva, President
Silva's Excavation
PO Box 1011, El Prado, NM 87529
1116 Paseo Pueblo del Sur, Taos, NM 87571

Re: Construction Stormwater, SIC 1542, NPDES Compliance Evaluation Inspection, Silva's Excavation, Inc., El Valle de los Ranchos Sewer Installation Construction Project, NPDES Permit NMR12AI33, May 29, 2013

Dear Mr. Silva,

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at a construction site for which you may be an "operator" (see Appendix A in permit). The NMED conducted this inspection on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are noted in the checklist section of the inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both USEPA (Diana McDonald, USEPA (6EN-WT), 1445 Ross Ave., Dallas, Texas, 75202), NMED (at the above address) regarding modifications and compliance schedules.

I want to thank you for the assistance of Mr. Alex Abeyta during this inspection. If you have any questions, please feel free to contact me at sarah.holcomb@state.nm.us or by telephone at (505) 222-9587.

Sincerely,
/s/ Sarah Holcomb
Sarah Holcomb
Surface Water Quality Bureau

Cc: Rashida Bowlin, USEPA (6EN-AS) by email Hannah Branning, USEPA (6EN-AS) by email
Carol Peters-Wagnon (6EN-AS) by email
Diana McDonald, USEPA (6EN-AS) by email
Darlene Whitten-Hill, USEPA (6EN-AS) by email
NMED District 2 Manager, by email



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code			NPDES										yr/mo/day					Inspec. Type		Inspector		Fac Type							
1	N	2	5	3	N	M	R	1	2	A	I	3	3	11	12	1	3	0	5	2	9	17	18	}	19	S	20	2	
Remarks																													
C O N S T R U C T I O N										> 5 A C R E S																			
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----													
67				69		70		3		71		N		72		N		73				74		75				80	

Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> SEWER LINE INSTALLATION, RANCHOS DE TAOS, TAOS COUNTY, NM; the sewer line installation covers about 100 acres of disturbed area in the vicinity of the intersection of Hwy 68 and Hwy 518 in Ranchos de Taos, NM.		Entry Time /Date 1030 hours/5-29-2013	Permit Effective Date 2-15-2012
		Exit Time/Date 1500 hours/5-29-2013	Permit Expiration Date 2-14-2017
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Alex Abeyta, President, Abeyta Engineering (575) 737-0377			Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Mike Silva, Owner, Silva's Excavation, Inc. (575)758-4562 1116 Paseo Pueblo del Sur, Taos, NM 87571/PO Box 1011, El Prado, NM87529		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	GPS: N. 31° 47' 32.10" W. 106° 34' 18.89" SIC 1623

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

1. Inspector arrived at the site at approximately 1030 hours on May 29, 2013 and conducted an entrance interview with Mr. Alex Abeyta, Engineer of Record for El Valle de los Ranchos Water and Sanitation District, where she presented her credentials, made introductions and explained the purpose of the inspection. An exit interview was conducted with Mr. Rivera, Mr. Mario Barela – Board Vice President, Mr. Mike Silva – Owner of Silva's Excavation, and Mr. Mike Dempsey – SWPPP contractor at approximately 1400 hours at the El Valle de los Ranchos offices that same day.
2. Please see report for further explanations.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 6-10-2013
Signature of Management QA Reviewer Bruce Yurdin /s/ Bruce Yurdin	Agency/Office/Phone and Fax Numbers 505-827-2795	Date 6-10-2013

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

National Database Information			General	
Inspection Type	CEI		Inspector Name	S. Holcomb
NPDES ID Number	NMR12AI33		Telephone	505-222-9587
Inspection Date	5-29-2013		Entry Time	1030 hours
Inspector Type (circle one)	EPA	<input checked="" type="checkbox"/> State	EPA Oversight	Exit Time 1500 hours
Facility Type (circle one)	Commercial /	<input checked="" type="checkbox"/> Residential	/	Signature <i>/s/ Sarah Holcomb</i>
	Municipal /	Industrial		

Facility Location Information				
Name/Location/Mailing Address	El Valle de los Ranchos Sewer Installation, near Hwy 68 and Hwy 518 intersection in Ranchos de Taos, NM Physical: 1116 Paseo Pueblo del Sur, Taos, NM 8757 Mailing: PO Box 1011, El Prado, NM 87529			
Coordinates	Latitude	N. 31° 47' 32.10"	Longitude	W -106° 34' 18.89"
Receiving Waters	Rio Grande del Rancho in 20.6.4.123 NMAC			
Disturbed Area	100 acres	Start/Stop Dates	2-12-2013 to 4-3-2014	

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	El Valle de los Ranchos Water and Sanitation District – Owner Silva’s Excavation - Contractor	
Facility Contact	Mr. Alex Abeyta, Engineer of Record for El Valle de los Ranchos	575-737-0377
Authorized Official(s)	Mr. Mario Barela, Board Vice President – El Valle de los Ranchos Mr. Mike Silva – Silva’s Excavation	575-751-1700 575-758-4562

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

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP Prepared & Available? <i>Part 7.1.1, 7.2.1</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Permit Type	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Notice Posted (visible, font large, NPDES Permit tracking#, contact name & phone #) <i>Part 1.5</i>	<input checked="" type="checkbox"/> Y Silva’s	<input checked="" type="checkbox"/> N El Valle	SWPPP Implementation Satisfactory?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
NOI Date	3-27-13		SWPPP Date	1-1-2013	
Is NOI Satisfactory?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			

Additional Facility and Inspection Information (<i>optional</i>)

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

SWPPP Review <i>(can be completed in office)</i>			
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	Mr. Barela signed the SWPPP just before the exit interview.
SWPPP completed prior to NOI? <i>Part 7.1.1, Part 1.2.1</i>	<input checked="" type="checkbox"/> Y	N	
Endangered Species Act. Does SWPPP include documentation supporting determination? <i>Part 7.2.14.1; Part 1.1.e, Appendix D</i>	<input checked="" type="checkbox"/> Y	N	NOI certified Criterion C.
Historic Properties. Does SWPPP include documentation supporting determination? <i>Part 7.2.14.2, Appendix E</i>	<input checked="" type="checkbox"/> Y	N	
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	N/A
Post-Authorization Additions. Does SWPPP include: <ul style="list-style-type: none"> ➤ Copy of acknowledgement letter <input checked="" type="checkbox"/> Y/N ➤ Copy of NOI <input checked="" type="checkbox"/> Y/N ➤ Copy of permit <input checked="" type="checkbox"/> Y/ N <i>Part 7.2.16.3</i>	<input checked="" type="checkbox"/> Y	N	
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	N/A
If discharge to an impaired water, includes records of all data used to complete NOI: <ul style="list-style-type: none"> ➤ List of all impaired waters Y/<input checked="" type="checkbox"/> N ➤ Pollutant(s) for which the surface water is impaired Y/<input checked="" type="checkbox"/> N ➤ Whether a TMDL has been approved or established Y/<input checked="" type="checkbox"/> N <i>Part 3.2.1, Appendix I.15</i>	Y	<input checked="" type="checkbox"/> N	
Required SWPPP modifications completed? <ul style="list-style-type: none"> ➤ Completed w/7 days Y/N ➤ Maintains modification records showing dates, name of person authorizing change and summary Y/N ➤ Signed/Certified Y/N ➤ Immediately notified other operators Y/N <i>Parts 7.4, 5.2.2, Appendix I.11.b</i>	Y	N	No major modifications had been required at the time of this inspection.
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? <i>Parts 4.1.7, 5.4.4, Appendix I.10.2, I.15</i>	<input checked="" type="checkbox"/> Y	N	

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

Team & Activity Description	Notes:		
<p>Identifies stormwater team personnel and responsibilities?</p> <ul style="list-style-type: none"> ➤ Personnel (by name or position) Y/<input type="checkbox"/>N ➤ Individual responsibilities Y/<input type="checkbox"/>N <p><i>Part 7.2.1</i></p>	Y	<input type="checkbox"/> N	
<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 Y/<input type="checkbox"/>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 Y/<input type="checkbox"/>N ○ Personnel responsible for the application and storage of treatment chemicals Y/<input type="checkbox"/>N ○ Personnel responsible for conducting inspections Y/<input type="checkbox"/>N ○ Personnel responsible for taking corrective actions Y/<input type="checkbox"/>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 Y/<input type="checkbox"/>N ○ Proper procedures to follow with respect to the permit's pollution prevention requirements Y/<input type="checkbox"/>N ○ When and how to conduct inspections, record applicable findings, and take corrective actions Y/<input type="checkbox"/>N <p><i>Parts 7.2.13, 6 and permit notes for emergency-related construction activities</i></p>	Y	<input type="checkbox"/> N	
<p>Describes nature of construction activities?</p> <ul style="list-style-type: none"> ➤ Size of the property <input type="checkbox"/>Y/<input type="checkbox"/>N ➤ Total area to be disturbed <input type="checkbox"/>Y/<input type="checkbox"/>N ➤ Construction support activity areas Y/N/<input type="checkbox"/>NA ➤ Maximum area to be disturbed at any one time <input type="checkbox"/>Y/<input type="checkbox"/>N <p><i>Part 7.2.2</i></p>	<input type="checkbox"/> Y	N	
<p>If applicable, documents emergency-related projects?</p> <ul style="list-style-type: none"> ➤ Cause of public emergency (e.g., natural disaster, extreme flooding conditions, etc.) Y/N ➤ Info substantiating occurrence (e.g., state disaster declaration or similar state or local declaration) Y/N ➤ Description of the construction necessary to 	Y	N	N/A

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reestablish effected public services Y/N <i>Parts 7.2.3, 1.2</i>			
Identifies (lists) other site operators and areas of site over which each has control? ➤ List and areas of site over which each has control <input checked="" type="checkbox"/> /N <i>Part 7.2.4</i>	<input checked="" type="checkbox"/>	N	
Describes sequence, estimated dates (departures) and duration of construction activities? ➤ Installation of control measures when operational <input checked="" type="checkbox"/> /N ➤ Commencement/duration clearing & grubbing, mass grading, site preparation (excavating, cutting & filling), final grading, and creation of soil & vegetation stockpiles Y/ <input checked="" type="checkbox"/> ➤ Cessation, temporarily or permanently, of construction activities on the site, or in designated portions of site Y/N/ <input checked="" type="checkbox"/> ➤ Final/temporary stabilization areas of exposed soil Y/N/ <input checked="" type="checkbox"/> ➤ Removal of temporary stormwater conveyances/channels and other stormwater control measures Y/N/ <input checked="" type="checkbox"/> ➤ Removal of construction equipment and vehicles Y/N/ <input checked="" type="checkbox"/> <i>Part 7.2.5</i>	Y	<input checked="" type="checkbox"/>	
Site Map	Notes:		
Includes legible site map(s)? <i>Part 7.2.6</i>	<input checked="" type="checkbox"/>	N	
➤ Boundaries of the property Y/ <input checked="" type="checkbox"/> ➤ Locations construction activities will occur <input checked="" type="checkbox"/> /N ➤ Locations earth-disturbing activities will occur (note any phasing) <input checked="" type="checkbox"/> /N ➤ Approximate slopes before and after major grading (note steep slopes) Y/ <input checked="" type="checkbox"/> ➤ Locations sediment, soil, or materials will be stockpiled Y/ <input checked="" type="checkbox"/> ➤ Locations of crossings of surface waters Y/ <input checked="" type="checkbox"/> ➤ Designated points vehicles exit onto paved roads Y/ <input checked="" type="checkbox"/> ➤ Locations of structures/impervious surfaces upon completion <input checked="" type="checkbox"/> /N ➤ Locations of construction support activity areas Y/N/ <input checked="" type="checkbox"/> <i>Part 7.2.6.1</i>	Y	<input checked="" type="checkbox"/>	Map did not reflect current conditions or show BMPs.
➤ Locations of surface waters/wetlands, within or in immediate vicinity <input checked="" type="checkbox"/> /N ➤ Indicates waters listed as impaired, and Tier 2, Tier 2.5 , or Tier 3 Y/ <input checked="" type="checkbox"/> <i>Part 7.2.6.2</i>	Y	<input checked="" type="checkbox"/>	

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<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	There were no buffers on site at the time of this inspection, and were needed in at least two locations.
<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	<input type="checkbox"/> N	
<ul style="list-style-type: none"> ➤ Topography Y/<input type="checkbox"/> N ➤ Existing vegetative cover Y/<input type="checkbox"/> N ➤ Drainage pattern of stormwater/authorized non-stormwater flow onto, over, and from site <u>before and after</u> major grading Y/<input type="checkbox"/> N <i>Part 7.2.6.5</i>	Y	<input type="checkbox"/> N	
<ul style="list-style-type: none"> ➤ Stormwater and allowable non-stormwater discharge locations Y/<input type="checkbox"/> N ➤ Locations of storm drain inlets on site and immediate vicinity Y/N/<input type="checkbox"/> NA ➤ Locations stormwater or allowable non-stormwater will be discharged to surface waters (including wetlands) on or near site Y/<input type="checkbox"/> N <i>Part 7.2.6.6</i>	Y	<input type="checkbox"/> N	The dewatering location was not shown on the site map.
<ul style="list-style-type: none"> ➤ Locations of potential pollutant-generating activities <i>Part 7.2.6.7, Part 7.2.7</i> 	<input type="checkbox"/> Y	N	
<ul style="list-style-type: none"> ➤ Locations of control measures <i>Part 7.2.6.8</i> 	Y	<input type="checkbox"/> N	
<ul style="list-style-type: none"> ➤ Locations polymers, flocculants, or treatment chemicals will be used/stored <i>Part 7.2.6.9</i> 	Y	N	N/A
Construction Site Pollutants		Notes:	
Includes pollutant-generating activities list and description? <i>Part 7.2.7.1</i>	Y	<input type="checkbox"/> N	
Includes inventory of pollutants or constituents? <ul style="list-style-type: none"> ➤ Inventory Y/<input type="checkbox"/> N ➤ Potential spills/leaks Y/<input type="checkbox"/> N ➤ Departures from manufacturer's specifications for applying fertilizers containing nitrogen & phosphorus Y/N/<input type="checkbox"/> NA <i>Parts 7.2.7.2, 2.3.5.1</i>	Y	<input type="checkbox"/> N	
Identifies all sources of allowable non-stormwater discharges? <i>Parts 7.2.8, 1.3.d</i>	<input type="checkbox"/> Y	N	
If required (surface water w/50 feet of earth disturbance), documents and describes <u>buffer compliance alternative</u> selected? <ul style="list-style-type: none"> ➤ 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 ➤ Uses velocity dissipation devices, if necessary Y/N/NA ➤ Documents natural buffer width Y/N/NA ➤ Delineates, and clearly marks off, with flags, 	Y	<input type="checkbox"/> N	Two locations (shown in pictures attached to this report) needed buffers or equivalent BMPs and did not have them.

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<p>tape, or other similar marking device all natural buffer areas Y/N/NA</p> <ul style="list-style-type: none"> ➤ Documents erosion and sediment control(s) used to achieve an equivalent sediment reduction Y/N/NA ➤ Documents any information relied upon to demonstrate equivalency Y/N/NA <p><i>Parts 7.2.9, 2.1.2, Appendix G</i></p>			
<p>As applicable, describes and documents <u>buffer exceptions</u>?</p> <ul style="list-style-type: none"> ➤ Describes rationale/why infeasible to provide and maintain an undisturbed natural buffer of any size Y/<input type="checkbox"/>/NA ➤ For linear project, describes buffer width retained and supplemental controls installed Y/N/<input type="checkbox"/>/NA ➤ Small residential lot options Y/N/<input type="checkbox"/>/NA ➤ Documents CWA Section 404 Permit, water-dependent structure/access disturbances Y/N <p><i>Parts 7.2.9; 2.1.2.1e, Appendix G</i></p>	Y	<input type="checkbox"/> N	
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 <input type="checkbox"/>/N ➤ Specific sediment controls installed and made operational prior to conducting earth-disturbing activities <input type="checkbox"/>/N ➤ For exit points, stabilization techniques and any additional controls planned to remove sediment prior to vehicle exit <input type="checkbox"/>/N ➤ For linear projects (if applicable), where/why it has been determined that the use of perimeter controls is practicable Y/N/<input type="checkbox"/>/NA <p><i>Part 7.2.10.1</i></p>	<input type="checkbox"/> Y	N	
Erosion and Sediment Controls	Notes:		
<p>Minimizes <u>area of disturbance</u>?</p> <p><i>Part 2.1.1.1</i></p>	<input type="checkbox"/> Y	N	Site was disturbed piece by piece.
<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 <input type="checkbox"/>/N ➤ Accounts for nature of run-on and run-off (channelized peak flow rates & total volume at outlet) Y/<input type="checkbox"/>/NA ➤ Accounts for range of soil particle sizes (distribution, erosivity and cohesiveness) <input type="checkbox"/>/N ➤ Directs discharge to vegetated areas to increase sediment removal and infiltration unless infeasible Y/N/<input type="checkbox"/>/NA ➤ Uses velocity dissipation, if necessary Y/<input type="checkbox"/>/N ➤ Complies with State of New Mexico except Indian country requirements: 	Y	<input type="checkbox"/> N	<p>RUSLE2 was used for this evaluation.</p> <p>Calculations show that pre-construction sediment delivery was 4.08 t/ac/yr, during (with no mention of BMP selection) was 0.67 t/ac/yr, and after stabilization was 0.54 t/ac/yr.</p>

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<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/<input checked="" type="checkbox"/>N ○ 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) <input checked="" type="checkbox"/>Y/N <p><i>Parts 2.1.1.2, 9.4.1.1</i></p>			
<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 <input checked="" type="checkbox"/>Y/N/NA ➤ Installs all other controls and makes operational as soon as conditions allow <input checked="" type="checkbox"/>Y/N ➤ Uses good engineering practices and follows manufacturer's specifications or explain departures <input checked="" type="checkbox"/>Y/N <p><i>Part 2.1.1.3</i></p>	<input checked="" type="checkbox"/> Y	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) Y/<input checked="" type="checkbox"/>N ➤ Installs new measure/significant repair no later than 7 calendar days or document why infeasible <input checked="" type="checkbox"/>Y/N <p><i>Part 2.1.1.4</i></p>	<input checked="" type="checkbox"/> Y	N	
<p>Installs <u>perimeter controls</u> 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>	<input checked="" type="checkbox"/> Y	N	
<p>Minimizes <u>sediment track-out</u>?</p> <ul style="list-style-type: none"> ➤ Restricts vehicle use to properly designated exit points? <input checked="" type="checkbox"/>Y/N ➤ Uses appropriate stabilization techniques at all points that exit onto paved roads? <input checked="" type="checkbox"/>Y/N ➤ Where necessary, uses additional measures to remove sediment prior to exit? Y/N/<input checked="" type="checkbox"/>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/N ? <p><i>Part 2.1.2.3</i></p>	<input checked="" type="checkbox"/> Y	N	No documentation that trackout has been an issue, or that cleanup has been conducted by the end of the business day.

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<p>Controls discharges from <u>stockpiled sediment or soil</u>?</p> <ul style="list-style-type: none"> ➤ Locates piles outside of buffers Y/N/<input type="checkbox"/>NA ➤ Locates piles separate from stormwater controls <input checked="" type="checkbox"/>Y/<input type="checkbox"/>N ➤ Uses temporary sediment barrier Y/<input checked="" type="checkbox"/>N ➤ Where practicable, provides cover or temporary stabilization Y/N/<input type="checkbox"/>NA ➤ Does not hose down or sweep into stormwater conveyance unless connected to basin, trap, etc. <input checked="" type="checkbox"/>Y/<input type="checkbox"/>N ➤ Contains and securely protects pile from wind? Y/<input checked="" type="checkbox"/>N <p><i>Part 2.1.2.4</i></p>	<input checked="" type="checkbox"/>	N	<p>According to permittee's representative, the stockpiles located at the site currently are sprayed down with water several times a day to prevent any wind migration of the material.</p>
<p>Minimizes <u>dust</u>?</p> <p><i>Part 2.1.2.5</i></p>	<input checked="" type="checkbox"/>	N	
<p>Minimizes disturbance of <u>steep slopes</u>?</p> <p><i>Part 2.1.2.6</i></p>	<input checked="" type="checkbox"/>	N	<p>Site was generally flat before beginning grading.</p>
<p>Preserves <u>topsoil</u>, unless infeasible?</p> <p><i>Part 2.1.2.7</i></p>	Y	N	<p>N/A</p>
<p>Minimizes <u>soil compaction</u> where final vegetative stabilization or infiltration installed?</p> <p><i>Part 2.1.2.8</i></p>	Y	<input checked="" type="checkbox"/>	
<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)?</p> <p><i>Part 2.1.2.9</i></p>	Y	N	<p>N/A – no storm drain inlets were installed at the time of this inspection.</p>
<p>Describes <u>constructed conveyance channel</u> controls (if installed)?</p> <p><i>Part 2.1.3.1</i></p>	Y	N	<p>N/A</p>
<p>Describes <u>sediment basin</u> design (if installed) and maintenance (maintain at least ½ of capacity at all times)?</p> <p><i>Part 2.1.3.2</i></p>	Y	N	<p>N/A</p>
<p>Describes <u>treatment chemical</u> controls (if used)?</p> <p><i>Part 2.1.3.3</i></p>	Y	N	<p>N/A</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 Y/N ➤ Lists all treatment chemicals and why the selection of these chemicals is suited to the soil characteristics Y/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 Y/N/NA 	Y	N	<p>N/A</p>

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

<ul style="list-style-type: none"> ➤ Dosage/methodology to determine dosage Y/N ➤ Information from any applicable MSDS Y/N ➤ Schematic drawings of any chemically-enhanced or chemical treatment systems Y/N/NA ➤ Description of how chemicals will be stored Y/N ➤ References to applicable state or local requirements and copies of applicable manufacturer's specifications Y/N ➤ Description of training that personnel have received or will receive Y/N <p><i>Parts 7.2.10.2, 2.1.3.3h</i></p>			
Describes dewatering controls (if installed)? <i>Part 2.1.3.4</i>	Y	<input type="checkbox"/> N	
Stabilization Requirements		Notes:	
Describes compliance with deadlines for vegetative and/or non-vegetative stabilization practices, including exceptions? <u>Deadline to Initiate</u> <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/<input type="checkbox"/> N <u>Deadline to Complete</u> <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) Y/<input type="checkbox"/> 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 Y/<input type="checkbox"/> N/NA ➤ Documents/describes circumstances beyond control that prevent meeting deadlines Y/<input type="checkbox"/> N/NA ➤ If discharging to sediment or nutrient-impaired waters or Tier 2-2.5 or 3 waters, completes stabilization (vegetative or non-vegetative) w/7 calendar days after temporary or permanent cessation Y/<input type="checkbox"/> N/NA <p><i>Parts 7.2.10.3, 2.2.1, 3, 9.4.1.3</i></p>	Y	<input type="checkbox"/> N	No specific stabilization schedules were included in the SWPPP.
Describes compliance with vegetative (final) stabilization criteria? <ul style="list-style-type: none"> ➤ Provides uniform vegetation (e.g., evenly distributed, without large bare areas) perennial vegetative cover with a density of 	<input type="checkbox"/> Y	N	There was no indication in the SWPPP that materials would be used to cover seeding/planting efforts until vegetation was established.

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<p>70% of the native background vegetative cover for all unpaved areas / areas not covered by permanent structures <input checked="" type="checkbox"/>/N</p> <p>➤ 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 Y/N</p> <p><i>Parts 7.2.10.3, 2.2.2.a, 3, 9.4.1.4</i></p>			
<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> <p>➤ Area seeded/planted must w/3 yrs provides established vegetation that achieves 70% of the native background vegetative cover <input checked="" type="checkbox"/>/N</p> <p>➤ Selects, designs, and installs non-vegetative erosion controls that provide cover for at least 3 years without active maintenance <input checked="" type="checkbox"/>/N</p> <p>➤ Complies with notification, inspection maintenance, and reporting) Y/N/<input checked="" type="checkbox"/>NA</p> <p><i>Parts 7.2.10.3, 2.2.2.b, 3, 9.4.1.5</i></p>	<input checked="" type="checkbox"/>	N	Reporting not necessary at this point in the project.
<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	N	N/A
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 checked="" type="checkbox"/>	N	
<p>Describes procedures for <u>waste management</u>?</p> <p><i>Part 7.2.11.2, 2.3.3.3</i></p>	<input checked="" type="checkbox"/>	N	
<p>Eliminates prohibited discharges?</p> <p>➤ Concrete washout, unless managed by control in Part 2.3.3.4 <input checked="" type="checkbox"/>/N</p> <p>➤ Washout/cleanout of stucco, paint, form release oils, curing compounds and other materials unless managed by control in Part 2.3.3.4 <input checked="" type="checkbox"/>/N</p> <p>➤ Fuels, oils or other from vehicle and equipment O&M <input checked="" type="checkbox"/>/N</p> <p>➤ Soaps, solvents, or detergents used in vehicle and equipment washing Y/N/<input checked="" type="checkbox"/>NA</p> <p>➤ Toxic or hazardous substances from spill/release <input checked="" type="checkbox"/>/N</p> <p><i>Part 2.3.1</i></p>	<input checked="" type="checkbox"/>	N	
<p>Properly maintains and protects all pollution prevention controls?</p> <p><i>Part 2.3.2</i></p>	Y	<input checked="" type="checkbox"/>	
<p>Complies with pollution prevention standards for certain activities?</p> <p>➤ Fueling/maintenance of equipment or vehicles <input checked="" type="checkbox"/>/N/NA</p>	<input checked="" type="checkbox"/>	N	

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<ul style="list-style-type: none"> ➤ Washing of equipment and vehicles Y/N/<input type="checkbox"/>NA ➤ Storage, handling, disposal of materials, products and waste <input type="checkbox"/>Y/N/NA ➤ Washing applicators/containers <input type="checkbox"/>Y/N/NA <p><i>Part 2.3.3</i></p>			
<p>Minimizes discharge/complies with restrictions of fertilizer application?</p> <p><i>Part 2.3.5</i></p>	Y	N	N/A

Inspections and Corrective Action			
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<p>SWPPP describes procedures for inspection, maintenance, and corrective action?</p> <ul style="list-style-type: none"> ➤ Personnel conducting inspections <input type="checkbox"/>Y/N ➤ Inspection schedule <input type="checkbox"/>Y/N ➤ Reduction of inspection frequency Y/N/<input type="checkbox"/>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/N/NA ○ beginning and ending dates of the seasonally-defined arid period for your area or the valid period of drought Y/N/NA ○ beginning and ending dates of frozen conditions Y/N/NA ➤ Inspection or maintenance checklists or other forms that will be used <input type="checkbox"/>Y/N <p><i>Parts 7.2.12</i></p>	<input checked="" type="checkbox"/> Y	N	Although the correct inspection frequency is not indicated in the SWPPP.
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Inspections	Notes:		
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<p>Inspections performed by "qualified" person?</p> <p><i>Part 4.1.1</i></p>	<input checked="" type="checkbox"/> Y	N	Proof of qualification needed to be included in the SWPPP.
<p>Conducts inspections at a minimum of required frequency unless reductions documented?</p> <ul style="list-style-type: none"> ➤ Every 7 days or 14 days & w/in 24 hrs of a 0.25" rain event Y/N <p><i>Part 4.1.2</i></p>	Y	<input type="checkbox"/> N	Inspections needed to be conducted every 7 days and were being done every 14 days and within 24 hours of a 0.25" rain event.
<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 Y/N; and ➤ 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	<input type="checkbox"/> 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 wi/24 hrs of the occurrence of a storm event ≥ 0.25" Y/N/NA ➤ For frozen conditions (runoff unlikely, disturbance suspended, areas stabilized) - 	Y	N	N/A

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suspends until thawing conditions Y/N/NA <i>Part 4.1.4.1 thru 3</i>			
Inspection areas includes: ➤ All cleared, graded, excavated, and not completed stabilization <input checked="" type="checkbox"/> /N ➤ All controls/measures <input checked="" type="checkbox"/> /N ➤ Material/waste/borrow/equipment storage and maintenance areas <input checked="" type="checkbox"/> /N ➤ All areas stormwater typically flows <input checked="" type="checkbox"/> /N ➤ All points of discharge <input checked="" type="checkbox"/> /N ➤ All locations stabilization implemented Y/N/ <input checked="" type="checkbox"/> NA <i>Part 4.1.5</i>	Y	N	
Inspection includes minimum requirements? ➤ Controls installed/operational <input checked="" type="checkbox"/> /N ➤ Determines need to replace, repair, or maintain <input checked="" type="checkbox"/> /N ➤ Conditions that could lead to spills, leaks, and accumulations of pollutants <input checked="" type="checkbox"/> /N ➤ Identifies where new or modified controls are necessary <input checked="" type="checkbox"/> /N ➤ At points of discharge, checks for visible erosion/sedimentation on banks Y/ <input checked="" type="checkbox"/> /NA ➤ Identifies noncompliance <input checked="" type="checkbox"/> /N ➤ If discharge is occurring: ○ Identifies all points of discharge Y/ <input checked="" type="checkbox"/> ○ Observes/documents visual quality, including color, odor, floating, settled, or suspended solids, foam, oil sheen, and other of pollutants Y/ <input checked="" type="checkbox"/> ○ Documents whether controls operating effectively, and describes controls not operating as intended or need maintenance Y/ <input checked="" type="checkbox"/> ➤ Based on results of inspection, initiates corrective action under Part 5. <input checked="" type="checkbox"/> /N <i>Part 4.1.6</i>	Y	<input checked="" type="checkbox"/> N	
Inspection reports: ➤ Completed within 24 hrs <input checked="" type="checkbox"/> /N ➤ Includes inspection date <input checked="" type="checkbox"/> /N ➤ Includes names/titles of personnel <input checked="" type="checkbox"/> /N ➤ Includes summary of findings <input checked="" type="checkbox"/> /N ➤ Includes applicable rain gauge reading <input checked="" type="checkbox"/> /N/NA ➤ Signed and certified in accordance with Appendix I.11 Y/ <input checked="" type="checkbox"/> <i>Part 4.1.7.1 and 2</i>	Y	<input checked="" type="checkbox"/> N	Mr. Dempsey was signing inspection reports. Inspection reports and all other reports associated with the permit must be signed by either the responsible official, or a designated person within that company.

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

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 checked="" type="checkbox"/> N	
<p>Within 24 hours of discovering the occurrence, completes a report of the following:</p> <ul style="list-style-type: none"> ➤ Condition identified <input checked="" type="checkbox"/> N ➤ Nature of the condition identified <input checked="" type="checkbox"/> N ➤ Date and time of the condition identified and how it was identified <input checked="" type="checkbox"/> N <p><i>Part 5.4</i></p>	Y	<input checked="" type="checkbox"/> N	
<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 <input checked="" type="checkbox"/> N ➤ Summary of stormwater control modifications taken or to be taken <input checked="" type="checkbox"/> N ➤ Schedule of activities necessary to implement changes <input checked="" type="checkbox"/> N ➤ Date the modifications are completed or expected to be completed <input checked="" type="checkbox"/> N ➤ Notice of whether SWPPP modifications are required as a result of the condition identified or corrective action <input checked="" type="checkbox"/> N ➤ Signed and certified in accordance with Appendix I.11 <input checked="" type="checkbox"/> N <p><i>Parts 5.4.2, 5.4.3</i></p>	Y	<input checked="" type="checkbox"/> N	

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

Additional Notes on SWPPP Review (optional)

This project will install approximately 7,000 linear feet of sewer line, connecting about 60 houses to the sewer that were previously on septic tanks.

At the time of this inspection, El Valle de los Ranchos Water and Sanitation District (as the owner of this project) did not have permit coverage. Silva's Excavation, the general contractor, obtained their permit coverage on March 27, 2013, although they began construction on February 18, 2013. During the exit interview, the permittee's representative stated that there were issues obtaining coverage through the website.

The NOI did not contain correct information regarding the status of the receiving stream. When the 2012 CGP was issued, it contained changes that were more closely linked to water quality determinations at the state level. This is tied to antidegradation procedures, which define all waterbodies in the state as one of three tiers. The policy can be found at <ftp://ftp.nmenv.state.nm.us/www/swqb/WQMP-CPP/APP-AppendixA.pdf>. All waterbodies that are classified as a Tier 2 (meaning that they are codified in the NM Water Quality Standards between 20.6.4.101-20.6.4.899 NMAC – the Rio Grande del Rancho is classified as 20.6.4.123 NMAC) are subject to increased inspection frequencies of every 7 days and within 24 hours of a 0.25" rain event, and a 7 day limitation on stabilization of a site after construction has been completed. Inspections at this site were being conducted every 14 days.

This site did have a couple of areas where construction had been completed but no stabilization had occurred yet. According to the permittee's representative, they were waiting to finally stabilize based on the county's recommendation of planting seed in June.

There were at least two locations where construction occurred within 50 feet of the Rio Grande del Rancho. There were BMPs in place (erosion sock), however there was no documentation contained in the SWPPP to indicate that this would have been equivalent to a 50 foot vegetated buffer.

Inspection reports were being signed by Mike Dempsey, SWPPP contractor for both parties. EPA determined that a third party contractor cannot sign permit related documents. All reports pertaining to the permit must be signed by the authorized official, or by a responsible person (as defined in the permit) within the company that has been authorized by the authorized official to sign on their behalf.

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

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:	<i>(Provide brief description)</i> The project is being done in small phases.
Buffer compliance:	<i>(e.g., provide and maintain a 50-foot undisturbed natural buffer)</i> There was no buffer in place at the time of this inspection.
Perimeter controls:	<i>(e.g., filter berms, silt fences, temporary diversion dikes)</i> Perimeter controls were used sparingly at the time of this inspection.
Exit point or sediment track out:	<i>(e.g., aggregate stone with an underlying geotextile or non-woven filter fabric, or turf mats, wheel washing, rumble strips, plates, sweeping)</i> No exit point trackout was used on this project due to the proximity of paved streets.
Stockpiled sediment or soil:	<i>(e.g., berms, dikes, fiber rolls, silt fences, sandbag, gravel bags)</i> Small stockpiles of sediment were located on site.
Minimize dust:	<i>(e.g., application of water or other dust suppression techniques)</i> Permittee's representative indicated that they water the site down several times per day.
Steep slopes:	<i>(e.g., standard erosion and sediment control practices, phasing disturbances, stabilization practices)</i> N/A
Preserve topsoil:	<i>(e.g., stockpiling or transfer of topsoil to other locations)</i> No topsoil was preserved at the site.
Soil compaction:	<i>(e.g., restrict vehicle / equipment use, soil conditioning techniques)</i> No vehicle restriction was being utilized on the day of this inspection.
Storm drain inlet protection:	<i>(e.g., fabric filters, sandbags, concrete blocks, gravel barriers)</i> No storm drains had been constructed as of the day of this inspection.
Conveyance channels:	<i>(e.g., erosion controls, and velocity dissipation check dams, sediment traps, riprap, or grouted riprap at outlets)</i> N/A
Sediment basin:	<i>(e.g., outlet structures that withdraw from the surface, stabilization, erosion controls, velocity dissipation, kept at least ½ design capacity)</i> N/A

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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>N/A</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>The groundwater was sent to a large field to infiltrate. No discharge was made to surface waters.</p>
Other erosion and sediment controls or practices:	<p><i>(Provide brief description)</i></p> <p>Erosion socks were located in the areas where the project ran parallel to the river.</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>No stabilization was occurring at the time of this inspection.</p>
Are stabilization measures initiated immediately? Y/N Are they completed within 14 days of construction cessation? Y/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>Stabilization was not being implemented at the time of this inspection.</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>Vehicle fueling is done at the contractor's home office.</p>
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 vehicle or equipment washing occurs at this site.</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 work had not yet started at this site but the permittee's representative indicated that a lined concrete washout system would be utilized in the future.</p>

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Pollution Prevention Measures – Continued	
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>None were being used on site at the time of this inspection.</p>
	<p><i>Pesticides, herbicides, insecticides, fertilizers, and landscape materials:</i></p> <p>N/A</p>
	<p><i>Diesel fuel, oil, hydraulic fluids, other petroleum products, and other chemicals:</i></p> <p>None stored on site.</p>
	<p><i>Hazardous or toxic waste (e.g, paints, solvents, petroleum-based products, wood preservatives, additives, curing compounds, acids):</i></p> <p>N/A</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>N/A</p>
	<p><i>Sanitary waste:</i></p> <p>Portolets were located on site and were staked down.</p>
Fertilizer application:	<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>N/A</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>No not allowable non-stormwater discharges were observed at the time 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>No sediment deposition was observed at the time of this inspection.</p>

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NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Sarah Holcomb	Date: 5-29-2013	Time: 1054 hours
City/County: Ranchos de Taos, Taos County		
Location: El Valle de los Ranchos Sewer Installation, near the intersection of Hwy 68 and Hwy 518		
Subject: The finished area prior to where the sewer traveled under Hwy 68 and the Rio Grande del Rancho. At the time of this inspection it had been finished for approximately 10 days without stabilization.		



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NMED/SWQB

Official Photograph Log

Photo # 2

Photographer: Sarah Holcomb	Date: 5-29-2013	Time: 1104 hours
City/County: Ranchos de Taos, Taos County		
Location: El Valle de los Ranchos Sewer Installation, near the intersection of Hwy 68 and Hwy 518		
Subject: On the south side of the Rio Grande del Rancho, BMPs in place along the river. However, there was not a 50 foot buffer against the river, as required by the permit, and there was no calculation in the SWPPP to show that the erosion socks were equivalent to a 50 foot buffer.		

