



BILL RICHARDSON
Governor
DIANE DENISH
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

Harold Runnels Building, N2050
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.nmenv.state.nm.us



RON CURRY
Secretary
SARAH COTTRELL
Deputy Secretary

Certified Mail - Return Receipt Requested

August 2, 2010

The Honorable, Mayor Darren Cordova
Town of Taos
400 Camino de la Placita
Taos, New Mexico 87571

RE: NPDES Construction Storm Water, Compliance Evaluation Inspection, Town of Taos Alexander GUSDORF Eco-Park, NMU001669, July 13, 2010

Dear Mayor Cordova:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) conducted at a construction site for which you may be an "operator" (see 2003/8 Construction General Permit (CGP), Definitions, Appendix A). The NMED conducted this inspection on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the worksheet inspection report. You are encouraged to review the inspection report; and required to correct any problems noted during the inspection and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both USEPA (Diana McDonald, USEPA 6EN-WM, 1445 Ross Avenue, Dallas, Texas 75202-2733) and Program Manager, NMED SWQB (address above) regarding modifications and compliance schedules.

I appreciate the cooperation of Mr. Manuel L. Pacheco, Director, Building and Grounds, Town of Taos during the inspection. If you have any questions about this inspection report, please contact me at 505-827-0418.

Sincerely,
/s/ Erin S. Trujillo

Erin S. Trujillo
Surface Water Quality Bureau

cc: Marcia Bohling, EPA (6EN-AS) by e-mail
Samuel Bates, EPA (6EN-AS) by e-mail
Carol Peters-Wagnon, EPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Robert Italiano NMED District II Manager by e-mail
Manuel L. Pacheco, Bldgs & Grounds Dir, Town of Taos by e-mail (mpacheco2@taos.gov.com)



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

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M U 0 0 1 6 6 9 11 12 1 0 0 7 1 3 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 1	71 N 72 N 73	74 75	80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Town of Taos Alexander GUSDORF Eco-Park, northwest of intersection of St. Francis Ln and Salazar Rd, Taos, New Mexico. From NM 68, take NM 585 (Pso Del Cannon W) to Salazar Rd, travel north, site on right. Taos County	Entry Time /Date 1208 hours / 07/13/2010	Permit Effective Date June 30, 2008
	Exit Time/Date 1450 hours / 07/13/2010	Permit Expiration Date June 30, 2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Clevon Thomas / Site Foreman, Lone Mountain Contracting, Inc. / 505-463-3794 Manuel L. Pacheco, Buildings and Grounds Director, Town of Taos / 575-751-2033, cell 770-6182	Other Facility Data Latitude 36.385393° Longitude -105.596398°	
Name, Address of Responsible Official/Title/Phone and Fax Number Darren Cordova, Town of Taos, 400 Camino de la Placita, Taos, New Mexico 87571-6071 / Mayor / Main 575-751-2000 and 751-2003	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	SIC 1629

Section C: Areas Evaluated During Inspection

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

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

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

- Owner/Developer - Town of Taos
Operator/General Contractor - Lone Mountain Contracting, Inc., a Nevada corporation registered in New Mexico
- A Compliance Evaluation Inspection (CEI) was conducted by Erin S. Trujillo, accompanied by Daniel Valenta, both of the NMED SWQB at the above-referenced recreational facility construction site. The inspector made introductions, presented credentials, and explained the purpose of the inspection to Mr. Thomas and to Mr. Pacheco upon his arrival. The inspectors, Mr. Thomas and Mr. Pacheco toured the site. An exit interview to discuss the preliminary findings of this inspection was conducted with Mr. Thomas and Mr. Pacheco on site.
- This report is based on a review of the EPA online notice of intent (eNOI) database, review of files maintained by the Operator and NMED, on-site observation by NMED personnel, and verbal information provided by the operator's representatives.
- Town of Taos did not sign/certify a Stormwater Pollution Prevention Plan (SWPPP) and had not submitted a signed/certified NOI to obtain permit coverage under the 2008 CGP.
- See attached worksheet with notes and photo log.

Name(s) and Signature(s) of Inspector(s) Erin S. Trujillo	Agency/Office/Telephone/Fax	Date
/s/ Erin S. Trujillo	NMED/SWQB/505-827-0418/505-827-0160	08/02/2010
Signature of Management QA Reviewer Richard E. Powell	Agency/Office/Phone and Fax Numbers	Date
/s/ Richard E. Powell	NMED/SWQB/505-827-2798/505-827-0160	08/02/2010

NPDES Industrial Storm Water Worksheet (Construction)

National Database Information				General			
Inspection Type	Compliance Inspection			Inspector Name	Erin S. Trujillo		
NPDES ID Number	NMU001669			Telephone	505-827-0418		
Inspection Date	07/13/2010			Entry Time	1208 hours		
Inspector Type <i>(circle one)</i>	EPA	<input type="checkbox"/> State	EPA Oversight	Exit Time	1450 hours		
Facility Type <i>(circle one)</i>	Commercial/Industrial	Residential	<input checked="" type="checkbox"/> Municipal	Signature	/s/ Erin S. Trujillo		
Facility Location Information							
Name/Location/ Mailing Address	Town of Taos Alexander Gusdorf Eco-Park / northwest of intersection of St. Francis and Salazar Road, Taos, New Mexico						
GPS Coordinates	Latitude	36.385393°	Longitude	-105.596398°			
Receiving Water(s)	Unclassified stream thence to Rio Pueblo de Taos (Segment 20.6.4.123 NMAC) thence to Rio Grande in Upper Rio Grande Basin						
Disturbed Area	23.25 acres	Start Date	05/24/2010	Stop Date	12/31/2010 Anticipated		
Contact Information							
	Name(s)			Telephone			
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	-Town of Taos (Owner/Developer) -Lone Mountain Contracting, Inc., (Gen Contractor)			-575-751-2000 -505-869-2996			
Facility Contact	-Manuel L. Pacheco, Bldgs & Grounds Dir, Town of Taos -Craig Blaisure, Proj Manger, Lone Mountain Contracting, Inc.			-575-751-2033, cell 770-6182 -505-869-2996, cell 918-1477			
Authorized Official(s)	-Mayor Darren Cordova, Town of Taos			-575-751-2000 and 751-2003			
Site Information: <i>(circle all that apply)</i>							
Nature of Project	<input type="checkbox"/> Residential	<input type="checkbox"/> Commercial/Industrial	<input type="checkbox"/> Roadway	<input type="checkbox"/> Private	<input type="checkbox"/> Federal	<input checked="" type="checkbox"/> State/ <input checked="" type="checkbox"/> Municipal	<input type="checkbox"/> Other
Construction Stage	<input checked="" type="checkbox"/> Clearing/ <input checked="" type="checkbox"/> Grubbing	<input checked="" type="checkbox"/> Rough <input checked="" type="checkbox"/> Grading	<input checked="" type="checkbox"/> Infrastructure	<input type="checkbox"/> Building Const.	<input type="checkbox"/> Final Grading	<input type="checkbox"/> Final Stabilization	
Basic Permit Information				Basic SWPPP Information			
Permit Coverage <i>ESO Element 3 & 4</i>	<input checked="" type="checkbox"/> Y	<input checked="" type="checkbox"/> N		SWPPP Prepared & Available <i>ESO Element 5 & 30</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Permit Type	<input checked="" type="checkbox"/> General	Individual		SWPPP Contents Satisfactory <i>ESO Elements 5 - 31</i>	<input checked="" type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Permit notice/sign visibly posted including: copy of NOI, contact name & phone number, location of SWPPP <i>ESO Element 41</i>	<input checked="" type="checkbox"/> Y	<input checked="" type="checkbox"/> N		SWPPP Implementation Satisfactory <i>ESO Elements 32 - 48</i>	<input checked="" type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
NOI Date	No NOI			SWPPP Date	5/12/2010		
If applicable, is waiver certification & approval on file?	<input checked="" type="checkbox"/> Y	N		<i>Intentionally left blank</i>			

NPDES Industrial Storm Water Worksheet (Construction)

SWPPP Review <i>(can be completed in office)</i>		
<u>General</u>	Notes:	
Is there a SWPPP? <i>ESO Element 4</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Prepared 05/12/2010 by Martin Mercado, Toluca Enterprises, Albuquerque, NM
SWPPP completed prior to NOI submission? <i>ESO Element 5</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Because NOI not submitted. On 05/10/2010, Isauro Mercado saved a draft NOI (tracking Number NMR10GZ04). NOI not signed/certified by responsible corporate officer of Lone Mountain Contracting, Inc.
Copy of permit language? <i>ESO Element 24</i>	Y <input checked="" type="checkbox"/> N	
Is SWPPP consistent with state/tribal/local regulations and permits? <i>ESO Element 25</i>	Y <input checked="" type="checkbox"/> N	SWPPP did not include documentation consistent with NM certification requirements in CGP Part 10.D.1.b (use of appropriate soil loss prediction models).
SWPPP updated to incorporate changes to State, Tribal, Local erosion plans? <i>ESO Element 26</i>	Y <input checked="" type="checkbox"/> N	SWPPP did not document implementation of NM certification requirements in CGP Part 10.D.1.b (i.e., rationale for selecting, design, implementation, and maintenance of BMPs not specified in SWPPP).
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires? <i>ESO Element 27</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Is a copy of the SWPPP on site or made available? <i>ESO Element 29</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Did all "operators" sign/certify the SWPPP? <i>ESO Element 30</i>	Y <input checked="" type="checkbox"/> N	Town of Taos did not sign/certify.
<u>Site Description</u>	Notes:	
SWPPP identifies potential sources of pollution? <i>ESO Element 6</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
SWPPP identifies all operators and their areas of control? <i>ESO Element 7</i>	Y <input checked="" type="checkbox"/> N	Town of Taos responsibilities not identified.
Is there a site description? <i>ESO Element 8</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Nature/sequence of construction activity? <i>ESO Element 8A – 8B</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Total area of site and total area to be disturbed? <i>ESO Element 8C</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Is there a general location map? <i>ESO Element 8D</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Is there a site map? <i>ESO Element 8E</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	

NPDES Industrial Storm Water Worksheet (Construction)

Site Description (cont'd)			Notes:
Drainage patterns/outfalls on site map? <i>ESO Element 8F</i>	<input checked="" type="checkbox"/>	N	
Area of soil disturbance on site map? <i>ESO Element 8F</i>	Y	<input checked="" type="checkbox"/>	Map also did not show locations where stabilization practices are expected to occur. Also areas described in SWPPP Section 1.7 (" <i>existing vegetation consisting of native sage grasses and juniper and pinon vegetation surrounding the proposed project area will be preserved during site construction.</i> ") were also not shown.
Location of major structural controls on site map? <i>ESO Element 8F</i>	Y	<input checked="" type="checkbox"/>	Map not updated, in this case, with actual location of site entrance/track out, to indicate silt fence had been removed, and that hay bales had not been installed.
Location of storm water discharges to a surface water on site map? <i>ESO Element 8F</i>	Y	<input checked="" type="checkbox"/>	
Location of materials or equipment storage on site map (on-site or off-site)? <i>ESO Element 8F</i>	Y	<input checked="" type="checkbox"/>	
Location/description industrial activities? <i>ESO Element 8G</i>	Y	N	Not Applicable
Name of Receiving water(s) or MS4 listed?	<input checked="" type="checkbox"/>	N	<i>Note: Indicate whether receiving water is 303(d) listed. But, "Taos River" described in SWPPP is actually called Rio Pueblo de Taos. Rio Pueblo de Taos (R Grande del Rancho to Taos Pueblo boundary) does not support High Quality Coldwater Aquatic Life and has a Total Maximum Daily Load (TMDL) for Specific Conductance and Temperature.</i>
Does the SWPPP include dates of major grading activities, temporary/permanent construction cessation, and initiation of stabilization practices? <i>ESO Element 13</i>	Y	<input checked="" type="checkbox"/>	On-site operator representative stated earth disturbance started 05/24/2010.
Endangered Species Documentation? <i>ESO Element 22</i>	Y	<input checked="" type="checkbox"/>	Not complete. Copy of portions of draft NOI in SWPPP did not provide information as to operator's intent (criterion) for eligibility. Taos County has listed species. Methods in Appendix C, Step 1, Endangered Species Act Review Procedures of the 2008 CGP (e.g., visual inspection, biological survey, or review associated with federal) permit) was not retained or described in SWPPP.

NPDES Industrial Storm Water Worksheet (Construction)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include a description of all pollution control measures (BMPs) that will be implemented to control pollutants in storm water discharges, including sequence and which operator responsible for implementation? <i>ESO Element 9 A - C</i>	Y	<input checked="" type="checkbox"/> N	See notes below on stabilization. Also, specific description or details of construction operations sediment basins were not provided in SWPPP.
Does the SWPPP include a description of interim and permanent <i>stabilization practices</i> (e.g., seeding, mulching, riprap for the site)? <i>ESO Element 10; 11</i>	Y	<input checked="" type="checkbox"/> N	Interim (temporary stabilization) of stockpiles or other areas not described.
Does the SWPPP identify the contractor(s) and timing by which <i>stabilization practices</i> will be implemented? <i>ESO Element 12</i>	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include a description of <i>structural practices</i> (e.g., vehicle track-out, silt fences, sediment traps, storm drain inlet protection) for the site? <i>ESO Element 14</i>	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP identify the contractor(s) and timing by which <i>structural practices</i> will be implemented? <i>ESO Element 10B - 10C</i>	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP identify storm water management measures to address storm water runoff once the construction is completed (e.g., retention ponds, velocity dissipation controls)? <i>ESO Element 15</i>	<input checked="" type="checkbox"/> Y	N	
Does SWPPP describe measures to prevent discharge of dredge/fill materials to waters of the U.S.? Does site have 404 permit? <i>ESO Element 16</i>	Y	N	Yes - Measures described in SWPPP for "entrance to arroyo." No - Site does not have a Section 404 permit.
Does SWPPP describe measures to minimize off-site vehicle tracking and generation of dust? <i>ESO Element 17</i>	<input checked="" type="checkbox"/> Y	N	
Does SWPPP describe controls for pollutants from storage of construction or waste materials? <i>ESO Element 18</i>	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP describe controls for pollutants from non-construction activities? <i>ESO Element 19</i>	<input checked="" type="checkbox"/> Y	N	
Does SWPPP identify allowable non-storm water discharges? <i>ESO Element 20</i>	<input checked="" type="checkbox"/> Y	N	
Does SWPPP ensure implementation of pollution prevention measures for non-storm water discharges? <i>ESO Element 21</i>	<input checked="" type="checkbox"/> Y	N	
Is SWPPP revised when BMPs added/modified within 7 days after inspection reveals problems? <i>ESO Element 28</i>	Y	N	No inspection reports retained in SWPPP.

NPDES Industrial Storm Water Worksheet (Construction)

<u>Inspections</u>			Notes:
Inspections performed once every 7 days, or every 14 days within 24 hours of a rain event greater 0.5"? <i>ESO Element 31</i>	Y	<input checked="" type="checkbox"/>	No inspection reports retained in SWPPP since reported start of construction (50 days by date of CEI). No inspection reports were provided by operator to inspector for consideration by the date of this report.
Inspections performed by qualified personnel? <i>ESO Element 32</i>	Y	<input checked="" type="checkbox"/>	See above – no inspection reports.
All disturbed areas and/or used for storage and exposed to rain inspected? <i>ESO Element 33</i>	Y	<input checked="" type="checkbox"/>	See above – no inspection reports.
All pollution control measures inspected to ensure proper operation? <i>ESO Element 34</i>	Y	<input checked="" type="checkbox"/>	See above – no inspection reports.
All discharge locations inspected if accessible, or if not accessible, are nearby downstream locations inspected? <i>ESO Element 35; 36</i>	Y	<input checked="" type="checkbox"/>	See above – no inspection reports.
Entrance/exit inspected for off-site tracking? <i>ESO Element 37</i>	Y	<input checked="" type="checkbox"/>	See above – no inspection reports.
Inspection report contain all required items and certified? <i>ESO Element 38; 39</i>	Y	<input checked="" type="checkbox"/>	See above – no inspection reports.

<u>Notes on SWPPP Review</u>
<p>SWPPP project description (Section 1.1) mistakenly listed the project site name as Sunland Park Arsenic Treatment Facility, Mescalero, NM.</p> <p>SWPPP indicates final stabilization will be complete by 12/31/2010. But, it was not clear from information from on-site operator representatives, if final stabilization is still anticipated to be complete when construction activity ceases. Operator responsibilities for implementing the SWPPP, including inspections and maintenance of control measures after 12/31/2010 should final stabilization not be complete, was not described in the SWPPP.</p>

NPDES Industrial Storm Water Worksheet (Construction)

SWPPP Implementation (complete in field)	
<u>Stabilization Practices</u>	
<p>List and describe stabilization practices <i>ESO Element 42, 48</i></p>	<p><i>(e.g., seeding, mulching, geotextiles, sod stabilization)</i></p> <p>Phasing of clearing/grubbing and rough grading had resulted in the preservation of vegetation in portions of site.</p>
<p>Are stabilization measures initiated no more than 14 days after temporary or permanent construction cessation? <i>ESO Element 45</i></p>	<p><i>(e.g., indicate "yes" or "no"; if "yes", how long without stabilization measures?)</i></p> <p>Unusable soil stockpile with debris (further discussed below and in Photos #3 and #4) had been temporarily stockpiled for approximately 3 weeks. Temporary stabilization measures were not observed or documented in SWPPP for this area.</p>
<u>Structural Practices</u>	
<p>List and describe structural controls <i>ESO Element 41, 42, 46</i></p>	<p><i>(e.g., silt fences, hay bales, storm drain inlet protection, sedimentation pond, rip rap, check dam, diversion structure, off-site vehicle track-out)</i></p> <p>Gravel vehicle track-out was located at construction entrance. Accumulated sediment was observed off-site on paved street (Photo # 1). Stabilized rock entrance has low area at site boundary and does not continue to paved portion of road. Annotation on site map describes entrance as "...crushed gravel over filter fabric." Filter fabric was not observed. Added/modified control measure (e.g., street cleaning) and maintenance of rock entrance appears needed to control off-site accumulation of sediment.</p> <p>Silt fence along St. Francis Lane and Salazar Road had been removed according to operator on-site representative. Stockpiled silt fence was observed at the on-site material storage area. Trenching on the day of the CEI to reinstall silt fence as described in SWPPP was observed along St. Francis Lane site boundary.</p> <p>Silt fence and hay bales had not been installed along the western site boundary shown on site map and no other control measures were observed where runoff would discharge off-site (Photos #5 and #6). Construction operations sediment basin (location of permanent storm drain basin) and earth dikes mentioned in SWPPP were not observed. No sediment or erosion control measures along the constructed drainage channel through the site had been described in the SWPPP or installed to minimize sediment from entering stormwater in channel during a rain event until final stabilization is complete (Photo #2 and #6). The 2008 CGP states, "<i>structural measures should be placed on upland soils to the degree practicable and achievable.</i>"</p>

NPDES Industrial Storm Water Worksheet (Construction)

Non-Structural Practices	
<p>Street Cleaning ESO Element 43</p>	<p><i>(e.g., describe measures taken to remove offsite accumulation of sediment)</i></p> <p>No measures observed. As previously noted, accumulated sediment was observed off-site on paved street.</p>
<p>Good Housekeeping & Waste Disposal Practices ESO Element 44</p>	<p><i>(e.g., describe measures taken to prevent litter and debris from becoming a pollutant source)</i></p> <p>On-site portable toilet was located near active construction activity near constructed drainage channel. Toilet was not protected from vehicle traffic. Location of portable toilet was not in materials storage area or “away from concentrated flow paths” as described in SWPPP Section 3.1</p> <p>Operator on-site representative stated that trash was removed from the site. Trash had been piled at equipment and material storage area (see Photo #7). No covered containers for trash were in this area. SWPPP Section 3.1 stated, “All waste materials will be collected and disposed of into dumpsters in the materials storage area.”</p> <p>A plastic storage container (protected cube also shown in Photo #7) of track material binder was being temporarily stored on site according to on-site operator representative. No stains or leaks from this container were observed.</p> <p>Scattered rusted cans from dumping on-site prior to construction was observed along the western site boundary. An on-site stockpile of unusable dirt according to on-site operator representative had trash, concrete, wooden boards, wooden pallets, tires, and cardboard boxes used to store fire works used in the Town’s fire work display. A mattress and metal boiler were also observed in this area. Arrangements for an adjacent land owner to remove fill material were being made according to the on-site operator representatives. SWPPP did not describe measures or anticipate the need to dispose of refuse from previous site activities. On-site representatives were advised to contact state NMED Solid Waste Bureau to confirm proper disposal requirements for the waste materials during the exit interview. Part 5.2.D (Construction and Waste Materials) of the 2008 Permit states, “the SWPPP must include a description of construction and waste materials expected to be stored on-site with updates as appropriate.”</p>
<p>Equipment Wash/ Maintenance Area ESO Elements 42</p>	<p><i>(provide brief description)</i></p> <p>No equipment wash or maintenance observed on-site.</p>
<p>Concrete Washout Areas ESO Elements 42</p>	<p><i>(provide brief description)</i></p> <p>No concrete washout observed.</p>

NPDES Industrial Storm Water Worksheet (Construction)

<u>Miscellaneous</u>	
<p style="text-align: center;">Evidence of Sediment Deposition to Surface Waters</p> <p style="font-size: small;">*ESO Eligibility - if "yes," site not eligible for ESO</p>	<p style="font-size: small;"><i>(e.g., significant turbidity observed in a receiving water body)</i></p> <p>No.</p>
<p style="text-align: center;">Pollution prevention measures for non-storm water discharges?</p> <p style="font-size: small;">*ESO Eligibility - If evidence of non-allowable non-storm water discharges, site not eligible for ESO</p>	<p style="font-size: small;"><i>(provide brief description and determine whether/if non-storm water discharges allowable)</i></p> <p>No non-storm water discharges observed.</p>
<p style="text-align: center;">Has implementation of additional/modified BMPs been completed before next anticipated storm event?</p> <p style="font-size: small;">ESO Element 43.C.1</p>	<p style="font-size: small;"><i>(provide brief description)</i></p> <p>See additional notes below.</p>
<u>Notes on SWPPP Implementation</u>	
<p>Control measures were not implemented as described in SWPPP. Part 3 Effluent Limits of the 2008 CGP states, <i>"You must implement the control measures from commencement of construction activity until final stabilization is complete."</i></p> <p>The constructed drainage channel from culverts crossing under Salazar Road to the western site boundary meandered through the site which may reduce stormwater velocity off-site. However, concentrated or increased flow velocity from the channel and a proposed outfall from a permanent storm drain basin could cause erosion and/or alter off-site water courses. Information on velocity dissipation of the drainage channel and future pond outfall was not described in SWPPP. Part 3.1.D (Erosive Velocity Control) of the 2008 CGP states, <i>"You must place velocity dissipation devices at discharge locations and along the length of any outfall channel to provide a non-erosive flow velocity from the structure to a water course so that the natural physical and biological characteristics and functions are maintained and protected (e.g., no significant changes in the hydrological regime of the receiving water)."</i> Also, Part 10.D.1.b states, <i>"The SWPPP must include site-specific interim and permanent stabilization, managerial, and structural solids, erosion, and sediment control best management practices (BMPs) and/or other controls that are designed to prevent to the maximum extent practicable an increase in the sediment yield and flow velocity from pre-construction, pre-development conditions to assure that applicable standards in 20.6.4 NMAC, including the antidegradation policy, or WLAs are met. This requirement applies to discharges both during construction and after construction operations have been completed."</i></p> <p>Part 5.10.A Maintaining an Updated Plan of the 2008 CGP states, <i>"The SWPPP must be modified: A. To reflect modifications to stormwater control measures made in response to a change in design, construction, operation, or maintenance at the construction site that has or could have a significant effect on the discharge of pollutants to the waters of the United States that has not been previously addressed in the SWPPP. B. If during inspections or investigations by site staff, or by local, state, tribal or federal officials, it is determined that the existing stormwater controls are ineffective in eliminating or significantly minimizing pollutants in stormwater discharges from the construction site. C. Based on the results of an inspection, as necessary to properly document additional or modified BMPs designed to correct problems identified. Revisions to the SWPPP must be completed within seven (7) calendar days following the inspection."</i></p>	

NPDES Industrial Storm Water Worksheet (Construction)

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Erin Trujillo	Date: 07/14/2010	Time: 1303 hours
City/County: Taos / Taos County		State: New Mexico
Location: Town of Taos Alexander Gusdorf Eco-Park		
Subject: Construction entrance (correct location was not shown on site map) with accumulated sediment from construction vehicle tracking on paved St Francis Lane.		



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Erin Trujillo	Date: 07/14/2010	Time: 1346 hours
City/County: Taos / Taos County		State: New Mexico
Location: Town of Taos Alexander Gusdorf Eco-Park		
Subject: Overview of drainage channel under construction through site. See Photo # 6 for outfall location.		



NPDES Industrial Storm Water Worksheet (Construction)

NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Erin Trujillo	Date: 07/14/2010	Time: 1400 hours
City/County: Taos / Taos County	State: New Mexico	
Location: Town of Taos Alexander Gusdorf Eco-Park		
Subject: Stockpile (north side) with mostly dirt fill and concrete visible. No sediment or erosion control measures observed.		



NMED/SWQB Official Photograph Log Photo # 4		
Photographer: Erin Trujillo	Date: 07/14/2010	Time: 1404 hours
City/County: Taos / Taos County	State: New Mexico	
Location: Town of Taos Alexander Gusdorf Eco-Park		
Subject: Same stockpile shown in previous photo (south side) with trash (cardboard boxes and bottles) and tire visible.		



NPDES Industrial Storm Water Worksheet (Construction)

NMED/SWQB Official Photograph Log Photo # 5		
Photographer: Erin Trujillo	Date: 07/14/2010	Time: 1412 hours
City/County: Taos / Taos County		State: New Mexico
Location: Town of Taos Alexander Gusdorf Eco-Park		
Subject: Western boundary. Silt fence shown on site map not installed.		



NMED/SWQB Official Photograph Log Photo # 6		
Photographer: Erin Trujillo	Date: 07/14/2010	Time: 1419 hours
City/County: Taos / Taos County		State: New Mexico
Location: Town of Taos Alexander Gusdorf Eco-Park		
Subject: Western boundary at south-southwest corner of site where stormwater in constructed drainage channel would flow off-site. Sediment basin and hale bales for this area described in SWPPP had not been constructed. Off-site erosion appears to have been altered from off-site dirt road shown in center of photo and downstream flood control berm not shown in photo.		



On-site Constructed
Drainage Channel

Off-site Erosion Features

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NMED/SWQB Official Photograph Log Photo # 7		
Photographer: Daniel Valenta	Date: 07/14/2010	Time: 1428 hours
City/County: Taos / Taos County	State: New Mexico	
Location: Town of Taos Alexander Gusdorf Eco-Park		
Subject: Arrow points to trash piled on ground, including cans and bottles at equipment and material storage area.		

