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ENVIRONMENT DEPARTMENT  
*Surface Water Quality Bureau*

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**Certified Mail – Return Receipt Requested**



DAVE MARTIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

August 24, 2011

Dr. Rod Weston, Ed.D., Superintendent  
Taos Municipal School District  
213 Paseo Del Canon  
Taos, New Mexico 87571

**RE: Construction Storm Water, SIC 1542, NPDES Compliance Evaluation Inspection, Taos Municipal School District / Enos Garcia Elementary School 3<sup>rd</sup> - 5<sup>th</sup> Grade Addition, NMU001749, August 5, 2011**

Dear Dr. Weston:

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 2008 Construction General Permit (CGP), Definitions, Appendix A). The NMED conducted this inspection on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

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

I appreciate the cooperation of Michael E. Davis, Project Superintendent, HB Construction of Alb., Inc. 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 Gail Adams, EPA (6EN-AS) by e-mail  
Samuel Tates, 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 - Santa Fe by e-mail



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	7	4	9	11	12	1	1	0	8	0	5	17	18	}	19	S	20	2
Remarks																												
C O N S T R U C T I O N > 1 A C R E																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----												
67						70						71		72		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)		Entry Time /Date		Permit Effective Date	
Enos Garcia Elementary School, 3 <sup>rd</sup> -5 <sup>th</sup> Grade Addition, 305 Don Fernando Street, Taos, NM. Taos County		1045 hours / 08/05/2011		June 30, 2008	
		Exit Time/Date		Permit Expiration Date	
		1345 hours / 08/05/2011		February 15, 2012	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
Michael E. Davis / Project Superintendent, HB Construction of Alb., Inc. / 505-856-0404				Entrance	
				Latitude 36.408122°	
				Longitude -105.577264°	
Name, Address of Responsible Official/Title/Phone and Fax Number				SIC 1542 (Primary)	
Dr. Rod Weston, Ed.D., Taos Municipal School District, 213 Paseo Del Canon, Taos, New Mexico 87571 / Superintendent / 575-758-5202, 570-916-0402, Fax: 575-758-5298, drweston@pobox.com				Contacted	
				Yes <input type="checkbox"/> No <input type="checkbox"/>	

**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
M	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 - Taos Municipal School District (NPDES Tracking No. NMU001749)  
General Contractor - HB Construction of Alb., Inc. (NPDES Tracking No. NMR10H908)
- Taos Municipal School District (TMSD) did not obtain permit coverage under USEPA's 2008 Construction General Permit. The Stormwater Pollution Prevention Plan (SWPPP) for the project identified the school district as the owner.
- See attached worksheet with notes, site location map and photo log.

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Telephone/Fax		Date	
Erin S. Trujillo /s/Erin S. Trujillo		NMED/SWQB/505-827-0418/505-827-0160		08/24/2011	
Signature of Management QA Reviewer		Agency/Office/Phone and Fax Numbers		Date	
Richard E. Powell /s/Richard E. Powell		NMED/SWQB/505-827-2798/505-827-0160		08/24/2011	

## NPDES Industrial Storm Water Worksheet (Construction)

National Database Information				General			
Inspection Type	Compliance Evaluation Inspection			Inspector Name	Erin S. Trujillo		
NPDES ID Number	NMR10H908 & NMU001749			Telephone	505-827-0418		
Inspection Date	08/05/2011			Entry Time	1045 hours		
Inspector Type <i>(circle one)</i>	EPA	<input checked="" type="checkbox"/> State	EPA Oversight	Exit Time	1345 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	Enos Garcia Elementary School 3rd-5th Grade Addition, 305 Don Fernando St, Taos, NM. Taos County						
GPS Coordinates	Latitude	36.408122°	Longitude	-105.577264°			
Receiving Water(s)	Rio Fernando de Taos and Rio Pueblo de Taos (both 20.6.4.123 NMAC) thence Rio Grande						
Disturbed Area	~1.6 acres	Start Date	06/01/2010	Stop Date	08/29/2011 Estimate		
Contact Information							
	Name(s)			Telephone			
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	-Taos Municipal School District (Owner/Developer) -HB Construction of Alb., Inc. (General Contractor)			575-758-5202			
Facility Contact	Michael E. Davis, HB Construction of Alb., Inc.			505-856-0404			
Authorized Official(s)	-Dr. Rod Weston, Ed.D., Superintendent, Taos Municipal School District (TMSD) -Jason Harrington, HB Construction of Alb., Inc. (HB)			575-758-5202 505-856-0404			
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 type="checkbox"/> Clearing/ Grubbing	<input type="checkbox"/> Rough Grading	<input type="checkbox"/> Infrastructure	<input type="checkbox"/> Building Const.	<input checked="" type="checkbox"/> Final <input checked="" type="checkbox"/> Grading	<input checked="" type="checkbox"/> Final <input checked="" type="checkbox"/> Stabilization	
Basic Permit Information				Basic SWPPP Information			
Permit Coverage <i>ESO Element 3 &amp; 4</i>	<input checked="" type="checkbox"/> HB	<input type="checkbox"/> TMSD		SWPPP Prepared & Available <i>ESO Element 5 &amp; 30</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Permit Type	<input checked="" type="checkbox"/> General	<input type="checkbox"/> Individual		SWPPP Contents Satisfactory <i>ESO Elements 5 - 31</i>	<input 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"/> HB	<input type="checkbox"/> No NOI <input type="checkbox"/> TMSD		SWPPP Implementation Satisfactory <i>ESO Elements 32 - 48</i>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
NOI Date	01/11/2011 HB	<input type="checkbox"/> No NOI <input type="checkbox"/> TMSD		SWPPP Date	05/13/2010		
If applicable, is waiver certification & approval on file?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N		<i>Intentionally left blank</i>			

## NPDES Industrial Storm Water Worksheet (Construction)

<b>SWPPP Review</b> <i>(can be completed in office)</i>			
<u>General</u>	<u>Notes:</u>		
Is there a SWPPP? <i>ESO Element 4</i>	<input checked="" type="checkbox"/>	N	Prepared by Kelley Fetter, StormCo LLC, Bernalillo, New Mexico on 05/10/2010.
SWPPP completed prior to NOI submission? <i>ESO Element 5</i>	Y	<input checked="" type="checkbox"/>	SWPPP not completed (signed/certified). See notes below.
Copy of permit language? <i>ESO Element 24</i>	<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"/>	Not documented (see NM certification requirements in Part 10.D.1.b of 2008 CGP). Prediction model (in this case RUSLE2) was discussed, but control measures considered and results of pre, during and post construction soil loss calculations (e.g., tons/acre/year) were not provided in SWPPP.
SWPPP updated to incorporate changes to State, Tribal, Local erosion plans? <i>ESO Element 26</i>	Y	<input checked="" type="checkbox"/>	See note above.
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>	Y	<input checked="" type="checkbox"/>	See inspection notes below.
Is a copy of the SWPPP on site or made available? <i>ESO Element 29</i>	<input checked="" type="checkbox"/>	N	
Did all "operators" sign/certify the SWPPP? <i>ESO Element 30</i>	Y	<input checked="" type="checkbox"/>	SWPPP was not signed/certified by a principal executive officer or ranking elected official of TMSD or a duly authorized representative of that person. SWPPP was signed by Thomas K. Thomsen, Project Manager, HB on 05/13/2010, but not signed/certified by a responsible corporate officer of HB or a duly authorized representative of that person. Written authorization were not by a person described in Appendix G, Subsection 11.A of the 2008 CGP. Also, certification language had been altered (see Appendix G.11.D of the 2008 CGP).
<u>Site Description</u>	<u>Notes:</u>		
SWPPP identifies potential sources of pollution? <i>ESO Element 6</i>	<input checked="" type="checkbox"/>	N	
SWPPP identifies all operators and their areas of control? <i>ESO Element 7</i>	<input checked="" type="checkbox"/>	N	
Is there a site description? <i>ESO Element 8</i>	<input checked="" type="checkbox"/>	N	
Nature/sequence of construction activity? <i>ESO Element 8A – 8B</i>	<input checked="" type="checkbox"/>	N	
Total area of site and total area to be disturbed? <i>ESO Element 8C</i>	<input checked="" type="checkbox"/>	N	
Is there a general location map? <i>ESO Element 8D</i>	<input checked="" type="checkbox"/>	N	
Is there a site map? <i>ESO Element 8E</i>	<input checked="" type="checkbox"/>	N	But, only updated thru 06/14/2011. See notes below.

## NPDES Industrial Storm Water Worksheet (Construction)

<b>Site Description (cont'd)</b>			<b>Notes:</b>
Drainage patterns/outfalls on site map? <i>ESO Element 8F</i>	Y	<input type="checkbox"/> N	No drainage direction. Topo lines not legible. Storm sewer drop inlet on Manzanares Street not shown. Curb and sidewalk cuts with outlets to adjacent Don Fernando Street not shown.
Area of soil disturbance on site map? <i>ESO Element 8F</i>	Y	<input type="checkbox"/> N	
Location of major structural controls on site map? <i>ESO Element 8F</i>	Y	<input type="checkbox"/> N	Not updated with control measures for stockpile or drop inlet. Location of roll offs not shown.
Location of storm water discharges to a surface water on site map? <i>ESO Element 8F</i>	<input checked="" type="checkbox"/>	N	
Location of materials or equipment storage on site map (on-site or off-site)? <i>ESO Element 8F</i>	Y	<input type="checkbox"/> N	See notes below.
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.</i> Rio Fernando de Taos (Rio Pueblo de Taos to Tienditas Creek) and Rio Pueblo de Taos (Rio Grande del Rancho to Taos Pueblo boundary) do not support designated High Quality Coldwater Aquatic Life use. Both have an approved TMDL for temperature and specific conductance.
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 type="checkbox"/> N	
Endangered Species Documentation? <i>ESO Element 22</i>	Y	<input type="checkbox"/> N	NOI certified under Threatened & Endangered (T&E) Criterion E. Species list was included in SWPPP, but plan did not describe steps taken to determine the potential effects (see Appendix C of 2008 CGP).
<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP include a description of all pollution control measures (BMPs) that will be implemented to control pollutants in storm water discharges, including sequence and which operator responsible for implementation? <i>ESO Element 9 A - C</i>	Y	<input type="checkbox"/> N	Operator/contractor and estimated schedule (sequence) not updated/completed. See notes below.
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>	<input checked="" type="checkbox"/>	N	
Does the SWPPP identify the contractor(s) and timing by which <i>stabilization practices</i> will be implemented? <i>ESO Element 12</i>	Y	<input type="checkbox"/> N	Operator/contractor and estimated schedule in SWPPP Section 3.3 not updated/completed.

## NPDES Industrial Storm Water Worksheet (Construction)

<b>Controls to Reduce Pollutants (cont'd)</b>	<b>Notes:</b>		
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	<input type="checkbox"/> N	
Does the SWPPP identify the contractor(s) and timing by which <i>structural practices</i> will be implemented? <i>ESO Element 10B - 10C</i>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Contractor and estimated schedule in SWPPP Section 3.1 not updated/completed.
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	<input type="checkbox"/> 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>	<input type="checkbox"/> Y	<input type="checkbox"/> N	Not applicable.
Does SWPPP describe measures to minimize off-site vehicle tracking and generation of dust? <i>ESO Element 17</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does SWPPP describe controls for pollutants from storage of construction or waste materials? <i>ESO Element 18</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP describe controls for pollutants from non-construction activities? <i>ESO Element 19</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	Not applicable.
Does SWPPP identify allowable non-storm water discharges? <i>ESO Element 20</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does SWPPP ensure implementation of pollution prevention measures for non-storm water discharges? <i>ESO Element 21</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is SWPPP revised when BMPs added/modified within 7 days after inspection reveals problems? <i>ESO Element 28</i>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Inspection report for 02/22/2011 identified need to re-establish concrete washout; but, site map not modified until 03/05/2011. SWPPP described core material for mulch socks as untreated woodchips; but straw-filled socks were used on site. BMPs were removed/modified after inspection on 06/28/2011, but SWPPP not revised on day of this inspection.

## NPDES Industrial Storm Water Worksheet (Construction)

Inspections	Notes:
<p>Inspections performed <del>once every 7 days</del>, or every 14 days within 24 hours of a rain event greater 0.5"?</p> <p><i>ESO Element 31</i></p>	<p>Inspection on 07/07/2010 was 36 days following the construction start date provided by the Permittee's on-site representative. Inspections on 02/22/2011 (28 days) and 06/01/2011 (15 days) were greater than 14 days after the previous inspection. On the day of this CEI, it had been 38 days since the last inspection on 06/28/2011.</p> <p>No written reports for routine or rain event inspections between 07/21/2010 and 01/25/2011 were contained in SWPPP. Permittee's on-site representative stated that inspections had been conducted during this time period. A rain event of 0.5 inch was recorded at the site on 07/28/2010; but, a written report of an inspection within 24 hours of this date was not contained in the SWPPP.</p>
<p>Inspections performed by qualified personnel?</p> <p><i>ESO Element 32</i></p>	<p>Qualifications for Chris M., StormCo LLC, who conducted inspections after 7/21/2010 (11 of 12 written inspection reports) was not contained in SWPPP on inspection reports.</p>
<p>All disturbed areas and/or used for storage and exposed to rain inspected?</p> <p><i>ESO Element 33</i></p>	
<p>All pollution control measures inspected to ensure proper operation?</p> <p><i>ESO Element 34</i></p>	
<p>All discharge locations inspected if accessible, or if not accessible, are nearby downstream locations inspected?</p> <p><i>ESO Element 35; 36</i></p>	<p>Not documented. It was not documented if drop inlet locations were inspected.</p>
<p>Entrance/exit inspected for off-site tracking?</p> <p><i>ESO Element 37</i></p>	
<p>Inspection report contain all required items and certified? <i>ESO Element 38; 39</i></p>	<p>Reports did not include all corrective action implementation dates. Reports were not signed by a person described in Appendix G.11.A or by a duly authorized representative of that person for either HB or TMSD.</p> <p>Electronic signatures and initials were used on 10 of the 12 inspection reports. There are no provisions for electronic signature/initials of inspection reports in the 2008 CGP at this time.</p>

# NPDES Industrial Storm Water Worksheet (Construction)

## Notes on SWPPP Review

### Introduction

A Compliance Evaluation Inspection (CEI) was conducted by Erin S. Trujillo of the NMED SWQB at the above-referenced approximately 4.95 acre (1.6 acres disturbed) construction site. This inspection followed a dust complaint received by NMED SWQB received on 07/29/2011. Upon arrival, the inspector made introductions, explained the purpose of the inspection and presented credentials to Mr. Davis. The inspector and Mr. Davis toured the construction site. An exit interview to discuss the preliminary findings was conducted with Mr. Davis on site. Preliminary findings were discussed by telephone with Matt Mulligan, Project Manager, HB Construction of Alb., Inc. on 08/08/2011. Preliminary findings were discussed by telephone with Dr. Rod Weston, Ed.D., Superintendent, Taos Municipal School District on 08/10/2011.

This report is based on a review of the USEPA online notice of intent (eNOI) database, review of files maintained by HB Construction of Alb., Inc. (HB or permittee) and NMED, on-site observation by NMED personnel, and verbal information provided by the permittees' and operator (Taos Municipal School District or TB) on-site representative.

### Training

SWPPP Section 2.2 states, *"Employee training is a major component in ensuring the success of the project's SWPPP."* There was no documentation of employee or subcontractor training in the SWPPP. Part 3.7 (Training of Employees) of the 2008 CGP states, *"You must train employees and subcontractors as necessary to make them aware of the applicable control measures implemented at the site so that they follow applicable procedures."*

# NPDES Industrial Storm Water Worksheet (Construction)

SWPPP Implementation ( <i>complete in field</i> )	
<u>Stabilization Practices</u>	
<p><b>List and describe stabilization practices</b> <i>ESO Element 42, 48</i></p>	<p><i>(e.g., seeding, mulching, geotextiles, sod stabilization)</i></p> <p>Irrigation system installation and final grading was in progress. Stabilization included the completed building addition, pavement, curb and gutter, sidewalks, and artificial grass. According to the permittee's on-site representative, TMSD installed the playground mulch and artificial grass. Mulch/gravel and native plant landscaping had not been installed on the day of this inspection.</p>
<p><b>Are stabilization measures initiated no more than 14 days after temporary or permanent construction cessation?</b> <i>ESO Element 45</i></p>	<p><i>(e.g., indicate "yes" or "no"; if "yes", how long without stabilization measures?)</i></p> <p>No temporary or permanent construction cessation according to Permittee's on-site representative--previous excavated materials were placed in working piles and used for construction of the building's foundation.</p> <p>Accumulated sediment from Manzanares Street and driveways had been stockpiled (Photo 4) and was to be removed within 14 days according to the permittee's on-site representative.</p>
<u>Structural Practices</u>	
<p><b>List and describe structural controls</b> <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>Straw-filled socks had been recently removed and placed on paved areas. Socks also surrounded an on-site storm sewer drop inlet and stockpile. Because the straw-filled socks were on pavement, the measure was not staked as described in the SWPPP; therefore, modified/or additional measures appear needed to control sediment from the stockpile during a rain event (Photo 4). The drop inlet protection was also not installed as described in the SWPPP (Photo 3). Drop inlet at curb diagrams in SWPPP show sandbags and geotextile blanket in addition to straw wattle at face of curb.</p> <p>A stabilized construction entrance (SWPPP described cobble rock) was not located where vehicles travel between an unpaved and paved driveway (Photo 2). A straw-filled sock was located at the unpaved driveway; but vehicle tracking was observed at this location. Additional measures and/or street sweeping of accumulated sediment appear needed to at this location on the day of this inspection.</p>

## NPDES Industrial Storm Water Worksheet (Construction)

<b><u>Non-Structural Practices</u></b>	
<b>Street Cleaning</b> <i>ESO Element 43</i>	<i>(e.g., describe measures taken to remove offsite accumulation of sediment)</i>  On-site sweeping was on-going, but a few remaining accumulated piles still needed to be removed from on-site street gutters. Although swept, sediment still existed on Manzanares Street. Off-site tracking was observed at the intersection of Manzanares Street and Don Fernando Street (Photo 1). As previously discussed, street sweeping of accumulated sediment appear needed on the day of this inspection.
<b>Good Housekeeping &amp; Waste Disposal Practices</b> <i>ESO Element 44</i>	<i>(e.g., describe measures taken to prevent litter and debris from becoming a pollutant source)</i>  No windblown trash was observed. Roll off container was on site for waste. Portable toilets were on site, but not at locations shown on Site Map. There were no containment measures (e.g. compost sock or earth berm) for portable toilets as described in SWPPP.
<b>Equipment Wash/ Maintenance Area</b> <i>ESO Elements 42</i>	<i>(provide brief description)</i>  No equipment wash/maintenance area was observed on the day of this inspection.
<b>Concrete Washout Areas</b> <i>ESO Elements 42</i>	<i>(provide brief description)</i>  Concrete washout was contained inside curbed areas on day of this inspection. A lined roll off container was on site for concrete washout according to the on-site permittee representative; but SWPPP had not been updated to describe this modified/change in control measure.
<b><u>Miscellaneous</u></b>	
<b>Evidence of Sediment Deposition to Surface Waters</b> <i>*ESO Eligibility – if "yes," site not eligible for ESO</i>	<i>(e.g., significant turbidity observed in a receiving water body)</i>  None observed.
<b>Pollution prevention measures for non-storm water discharges?</b> <i>*ESO Eligibility – If evidence of non-allowable non-storm water discharges, site not eligible for ESO</i>	<i>(provide brief description and determine whether/if non-storm water discharges allowable)</i>  No non-stormwater discharges observed on the day of this inspection.
<b>Has implementation of additional/modified BMPs been completed before next anticipated storm event?</b> <i>ESO Element 43.C.1</i>	<i>(provide brief description)</i>  No/Not Documented. Date of modifications to control measures not documented, not all inspection reports contained in SWPPP and site map was not up to date.

## NPDES Industrial Storm Water Worksheet (Construction)

### Notes on SWPPP Implementation

#### Spill Kits

SWPPP Section 6.4 stated that service vehicles shall be equipped with spill kits. There was no documentation that service vehicles had spill kits. The permittee's on-site representative stated that there were no spill kits on site.

#### Equipment and Maintenance Areas

SWPPP Section 1.12 stated "*Materials used for equipment, maintenance and construction will be stored in the area dedicated for these items and noted on the plan.*" Dedicated areas were not shown on site map or otherwise noted in SWPPP.

#### Tracking and Dust

No blowing dust was observed on the day of this inspection. However, the SWPPP's logs to document sweeping had not been completed. SWPPP stated, "*off-site tracking and street cleaning minimized by requiring vehicles to park in stabilized areas and periodic (once a week or as needed) watering of exposed areas.*" Actual watering dates were also not documented in SWPPP.

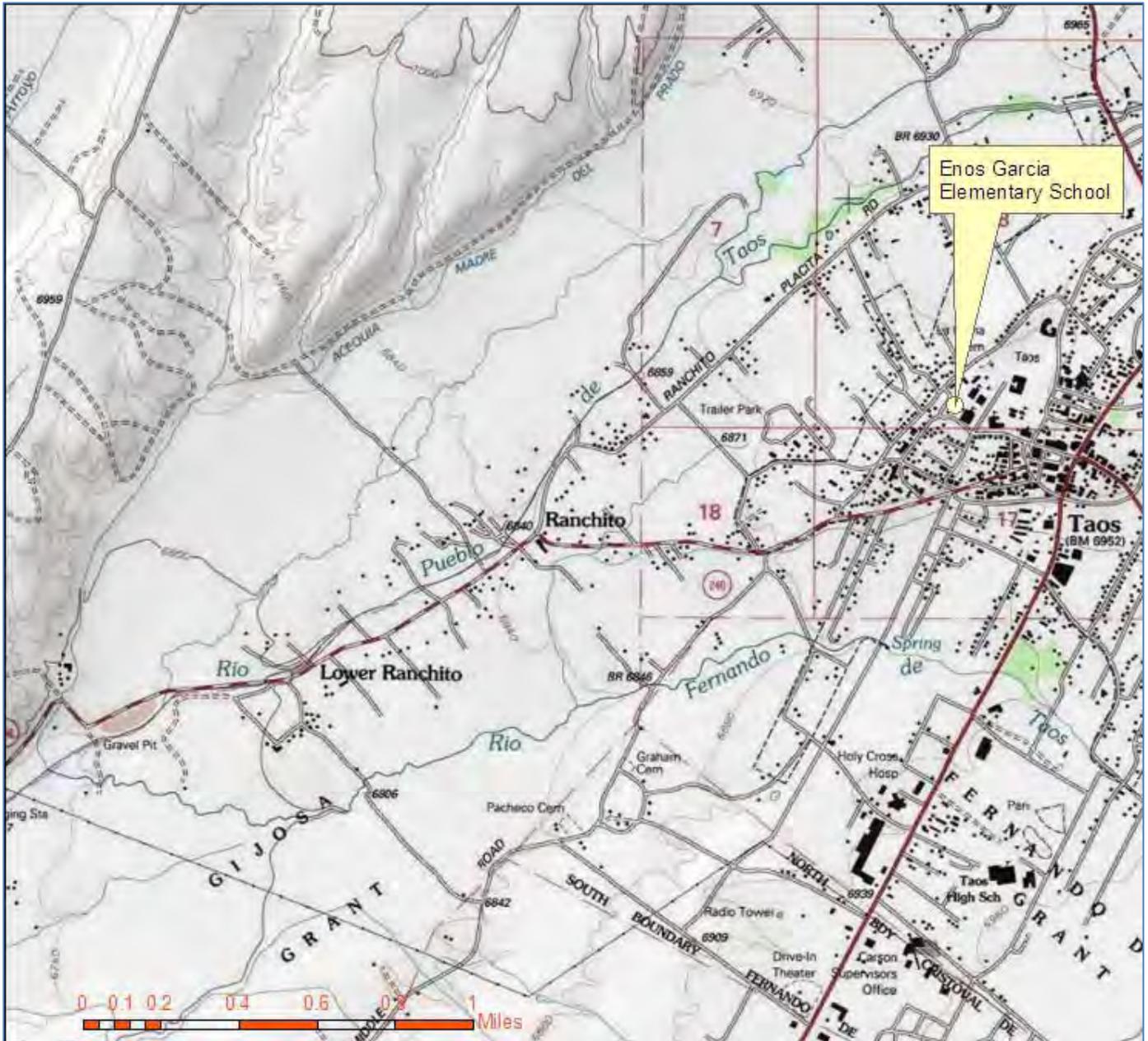
NMED/SWQB  
Site Location Map

Created by: Erin S. Trujillo

City/County: Taos / Taos

State: New Mexico

Location: Enos Garcia Elementary School 3rd - 5th Grade Addition, Taos Municipal School District



<b>NMED/SWQB          Official Photograph Log          Photo # 1</b>		
Photographer: Erin S. Trujillo	Date: 08/05/2011	Time: 1223 hours
City/County: Taos / Taos		State: New Mexico
Location: Enos Garcia Elementary School 3rd - 5th Grade Addition, Taos Municipal School District		
Subject: Accumulated sediment on Manzanares Street had been tracked onto Don Fernando Street. Drop inlets to storm sewer exist at this intersection.		



<b>NMED/SWQB          Official Photograph Log          Photo # 2</b>		
Photographer: Erin S. Trujillo	Date: 08/05/2011	Time: 1226 hours
City/County: Taos / Taos		State: New Mexico
Location: Enos Garcia Elementary School 3rd - 5th Grade Addition, Taos Municipal School District		
Subject: No track out control as described in SWPPP. Straw-filled sock at edge of unpaved driveway did not appear sufficient to control tracking. Drainage from driveway would flow to Manzanares St. & Don Fernando St. with drop inlets to storm sewer.		



<b>NMED/SWQB          Official Photograph Log          Photo # 3</b>		
Photographer: Erin S. Trujillo	Date: 08/05/2011	Time: 1229 hours
City/County: Taos / Taos	State: New Mexico	
Location: Enos Garcia Elementary School 3rd - 5th Grade Addition, Taos Municipal School District		
Subject: Straw-filled sock around drop inlet on Manzanares Street. Drop inlet protection not installed as described in SWPPP.		



<b>NMED/SWQB          Official Photograph Log          Photo # 4</b>		
Photographer: Erin S. Trujillo	Date: 08/05/2011	Time: 1230 hours
City/County: Taos / Taos	State: New Mexico	
Location: Enos Garcia Elementary School 3rd - 5th Grade Addition, Taos Municipal School District		
Subject: Accumulated sediment stockpile on Manzanares Street. Sock not installed as described in SWPPP		

