



NEW MEXICO
ENVIRONMENT DEPARTMENT
Surface Water Quality Bureau



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Secretary

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Deputy Secretary

Certified Mail – Return Receipt Requested

January 3, 2013

Scott Christensen, Vice President / General Manager
Santa Clara Construction, LLC
P.O. Box 2388
Española, New Mexico 87532

RE: Construction Storm Water, SIC 1629, NPDES Compliance Evaluation Inspection, Santa Clara Construction, LLC / Water Canyon Storm Drain Replacement, NMU001832, December 6, 2012

Dear Mr. Christensen:

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 2012 Construction General Permit (CGP), Definitions, Appendix A). The NMED conducted this inspection on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the 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 Brett Lincoln, Santa Clara Construction, LLC during this inspection. If you have any questions about this inspection report, please contact me at 505-827-0418.

Sincerely,

/s/Erin S. Trujillo

Erin S. Trujillo
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN) by e-mail
Hannah Branning, USEPA (6EN-WC) by e-mail
Darlene Whitten-Hill, USEPA (6EN-WC) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Robert Italiano, NMED District II Santa Fe by e-mail



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	8	3	2	11	12	1	2	1	2	0	6	17	18	}	19	S	20	2	
Remarks																													
C O N S T R U C T I O N > 1 A C R E S																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67						70	3	71	N	72	N	73			74														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
Water Canyon storm drain replacement project at NM 501 (West Jemez Road) approximately 1/3 miles north of NM 4, Los Alamos National Laboratory (LANL), Los Alamos County, New Mexico		~0945 hours / 12/06/2012	February 16, 2012
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)		Exit Time/Date	Permit Expiration Date
-Terrill Lemke, PE, CPESC, CISEC, LANL Storm Water Permitting/Compliance Team Leader, Water Quality & RCRA Group (ENV-RCRA), LANS / 505-665-2397, cell 505-699-0725 -Timothy Zimmerly, CPESC, CISEC, ENV-RCRA, LANS -Mike Saladen, Acting Group Leader, ENV-RCRA, LANS -Brett Lincoln, SWPPP Contact, Santa Clara Construction, LLC, 505-500-2560 -Gene E. Turner, Environmental Permitting Manager, Env. Projects Office, LASO / 505-667-5794		~1645 hours / 12/06/2012	February 16, 2017
Name, Address of Responsible Official/Title/Phone and Fax Number		Other Facility Data	
-Scott Christensen, Vice President, Santa Clara Construction, LLC, P.O. Box 2388, Española, New Mexico 87532 / 505-660-1006 or 412-2877		Latitude 35.838357° Longitude -106.359615° SIC 1629 (Primary Code for Construction Activity) SIC 9711, 9661 and 9611 (Facility)	
		Contacted Yes <input type="checkbox"/> No <input checked="" 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
M	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	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)

- Owner/Developer - Los Alamos National Security, LLC or LANS (NPDES Tracking No. NMR12A312 (2012 CGP))
General Contractor - Santa Clara Construction, LLC (NPDES Tracking No. NMU001832 (2012 CGP))
- Santa Clara Construction, LLC (SCC) submitted a notice of Intent (NOI) to obtain permit coverage under the USEPA Industrial Stormwater 2008 Construction General Permit (CGP)--NPDES Tracking No. NMR10HI68. SCC did not complete (sign/certify) an electronic NOI to obtain permit coverage under the 2012 CGP by the deadline of May 16, 2012 or on the day of this inspection. The status of a draft eNOI (NPDES Tracking No. NMR12A741) was pending certification on the day of this inspection and submitted to USEPA following this inspection on December 28, 2012.
- A separate USEPA Form 3560 will be sent to each operator.
- See attached worksheet with notes and photo log.

Name(s) and Signature(s) of Inspector(s) Erin S. Trujillo /s/Erin S. Trujillo	Agency/Office/Telephone/Fax NMED/SWQB/505-827-0418/505-827-0160	Date 01/03/2013
Signature of Management QA Reviewer Richard E. Powell /s/Richard E. Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798/505-827-0160	Date 01/03/2013

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

National Database Information			General	
Inspection Type	CEI		Inspector Name	Erin S. Trujillo
NPDES ID Number	NMR12A312 & NMU001832		Telephone	505-827-0418
Inspection Date	12/06/2012		Entry Time	~0945 hours
Inspector Type (circle one)	EPA	State	EPA Oversight	Exit Time
Facility Type (circle one)	Commercial / Residential / Municipal / <input checked="" type="checkbox"/> Industrial		Signature	s/Erin S. Trujillo

Facility Location Information			
Name/Location/Mailing Address	Water Canyon storm drain reconstruction project at NM 501 (West Jemez Road) approximately 1/3 miles north of NM 4, Los Alamos National Laboratory (LANL), Los Alamos County, New Mexico		
Coordinates	Latitude	35.838357°	Longitude
Receiving Waters	Water Canyon, w/LANL above NM 501 in Segment 20.6.4.128 NMAC and Area-A Canyon to NM 501 in Segment 20.6.4.128 NMAC, thence to Rio Grande.		
Disturbed Area	~3 acres	Start/Stop Dates	04/26/2012 (NOI) / TBD

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	-Los Alamos National Security, LLC or LANS (Owner/Developer) -Santa Clara Construction, LLC or SCC (General Contractor)	505-665-2397 505-753-9425
Facility Contact	-Terrill Lemke, LANS -Brett Lincoln, SCC	505-665-2397 505-500-2560
Authorized Official(s)	-Michael Brandt, Associate Director, ESHQ, LANS -Scott Christensen, Vice President/Gen. Manager, SCC	505-667-4218 505-660-1006

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

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	LANS <input checked="" type="checkbox"/>	SCC <input type="checkbox"/>	SWPPP Prepared & Available? <i>Part 7.1.1, 7.2.1</i>	<input checked="" type="checkbox"/>	N
Permit Type	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory?	Y	<input type="checkbox"/> N
Notice Posted (visible, font large, NPDES Permit tracking#, contact name & phone #) <i>Part 1.5</i>	Y	<input type="checkbox"/> N	SWPPP Implementation Satisfactory?	<input checked="" type="checkbox"/>	N
NOI Date	LANS 05/01/2012	SCC Pending	SWPPP Date	LANS 04/26/2012	SCC 04/26/2012
Is NOI Satisfactory?	Y	<input type="checkbox"/> N			

Additional Facility and Inspection Information (optional)
<u>Additional Notes on SWPPP Implementation:</u> Construction had ceased on the day of this inspection. Stabilization measures had been initiated. Facility Site Review (SWPPP implementation on the day of this inspection) appeared to be satisfactory. See notes below on inspections and corrective action documented prior to this inspection.
<u>Additional Notes on SCC NOI:</u> A copy of the SCC's status pending certification NOI (NPDES Tracking No. NMR12A741) was made available by on-site LANS representatives on the day of this inspection.

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	N	N = LANS (Not documented / see additional notes below on duly authorized representative) Y = Santa Clara Construction, LLC (SCC)
SWPPP completed prior to NOI? <i>Part 7.1.1, Part 1.2.1</i>	<input checked="" type="checkbox"/>	N	SWPPP prepared by North Wind, Inc., Los Alamos, NM
Endangered Species Act. Does SWPPP include documentation supporting determination? <i>Part 7.2.14.1; Part 1.1.e, Appendix D</i>	Y	N	Y = LANS Not Evaluated = SCC (NOI pending on day of this inspection)
Historic Properties. Does SWPPP include documentation supporting determination? <i>Part 7.2.14.2, Appendix E</i>	Y	N	Y = LANS Not Evaluated = SCC (NOI pending on day of this inspection)
If applicable, documents contact with agency or office responsible for implementing Safe Drinking Water Act <u>underground injection control well(s)</u>? <i>Part 7.2.14.3, 40 CFR Parts 144 -147</i>	Y	N	Not applicable
Post-Authorization Additions. Does SWPPP include: ➤ Copy of acknowledgement letter Y (LANS) ➤ Copy of NOI Y (LANS) ➤ Copy of permit Y <i>Part 7.2.16.3</i>	<input checked="" type="checkbox"/>	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	Not applicable
If discharge to an impaired water, includes records of all data used to complete NOI: ➤ List of all impaired waters Y ➤ Pollutant(s) for which the surface water is impaired N ➤ Whether a TMDL has been approved or established Y (No TMDL) <i>Part 3.2.1, Appendix I.15</i>	Y	<input checked="" type="checkbox"/>	Pollutant, which was indicated on NOI, was not listed / updated in SWPPP. <u>Comment:</u> Water Canyon within LANL above NM 501 in classified Segment 20.6.4.128 NMAC has not been assessed. This assessment unit of Water Canyon is a Tier 2 water. Water Canyon from Area-A Canyon to NM 501 in classified Segment 20.6.4.128 NMAC does not support Coldwater Aquatic Life. Probable cause of impairment is listed as Aluminum and the source is listed as unknown. This assessment unit of Water Canyon is both a Tier 1 water for Aluminum and Tier 2 water).

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

<p>Required SWPPP modifications completed?</p> <ul style="list-style-type: none"> ➤ Completed w/7 days N ➤ Maintains modification records showing dates, name of person authorizing change and summary N ➤ Signed/Certified N ➤ Immediately notified other operators Not documented <p><i>Parts 7.4, 5.2.2, Appendix I.11.b</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	See notes below on site map and corrective action reports.
<p>Records Retention. Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires or is terminated?</p> <p><i>Parts 4.1.7, 5.4.4, Appendix I.10.2, I.15</i></p>	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Report for inspection on 11/05/2012 and soil loss prediction model results were not retained in SWPPP. Inspection report was provided for review during this inspection. Model results were made available for review following this inspection.

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

Team & Activity Description			Notes:
Identifies stormwater team personnel and responsibilities? ➤ Personnel (by name or position) Y ➤ Individual responsibilities Y <i>Part 7.2.1</i>	Y	<input type="checkbox"/> N	Not updated. Personnel and responsibilities were not updated to include General Contractor's on-site SWPPP contact.
Is staff training documented? ➤ Training occurs prior to the commencement of earth-disturbing activities or pollutant-generating activities, whichever occurs first Y ➤ Ensures following understand the requirements of this permit and their specific responsibilities: ○ Personnel responsible for the design, installation, maintenance, and/or repair of controls/measures Not documented ○ Personnel responsible for the application and storage of treatment chemicals Y/N ○ Personnel responsible for conducting inspections Y ○ Personnel responsible for taking corrective actions Y ➤ At a minimum, training includes: ○ Location of all stormwater controls on the site required by this permit, and how maintained Not documented ○ Proper procedures to follow with respect to the permit's pollution prevention requirements Not documented ○ When and how to conduct inspections, record applicable findings, and take corrective actions Not documented <i>Parts 7.2.13, 6 and permit notes for emergency-related construction activities</i>	Y	<input type="checkbox"/> N	Not documented / not updated. A list of training topics and log with signatures of General Contractor attendees (both dated 12/01/2011) and inspector qualifications were contained in SWPPP. Topics were not updated for maintenance deadlines and increased inspection frequency in 2012 CGP. Qualifications for North Wind, Inc. SWPPP preparer not documented (see Part 9.4.1.1 of 2012 CGP). Minimum training not documented/not updated for 2012 CGP requirements.
Describes nature of construction activities? ➤ Size of the property Y ➤ Total area to be disturbed Y ➤ Construction support activity areas NA ➤ Maximum area to be disturbed at any one time Y <i>Part 7.2.2</i>	<input type="checkbox"/> Y	N	
If applicable, documents emergency-related projects? ➤ 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 reestablish effected public services Y/N <i>Parts 7.2.3, 1.2</i>	Y	N	Not applicable
Identifies (lists) other site operators and areas of site over which each has control? ➤ List and areas of site over which each has control Y <i>Part 7.2.4</i>	<input type="checkbox"/> Y	N	

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

<p>Describes sequence, estimated dates (departures) and duration of construction activities?</p> <ul style="list-style-type: none"> ➤ Installation of control measures when operational N ➤ Commencement/duration clearing & grubbing, mass grading, site preparation (excavating, cutting & filling), final grading, and creation of soil & vegetation stockpiles N ➤ Cessation, temporarily or permanently, of construction activities on the site, or in designated portions of site N ➤ Final/temporary stabilization areas of exposed soil Y ➤ Removal of temporary stormwater conveyances/channels and other stormwater control measures N ➤ Removal of construction equipment and vehicles N <p><i>Part 7.2.5</i></p>	Y	<input type="checkbox"/> N	<p>SWPPP provided estimated dates for utilities, borehole sampling, completion of new culvert/drainage system, initiate stabilization and final stabilization. Soil Disturbance Sequencing Table (SWPPP Appendix A) did not include actual dates. Also, table appeared to indicate that final stabilization was complete instead of only initiated.</p>
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Industrial Storm Water Worksheet (Construction) – State of New Mexico

Site Map			Notes:
Includes legible site map(s)? <i>Part 7.2.6</i>	<input checked="" type="checkbox"/> Y	N	But, 8 ½ x 11 topography map appeared to be of a scale that would make updates (see notes below) difficult.
<ul style="list-style-type: none"> ➤ Boundaries of the property Y ➤ Locations construction activities will occur Y ➤ Locations earth-disturbing activities will occur (note any phasing) Y ➤ Approximate slopes before and after major grading (note steep slopes) N ➤ Locations sediment, soil, or materials will be stockpiled Y (off site), N (on site) ➤ Locations of crossings of surface waters Y ➤ Designated points vehicles exit onto paved roads N ➤ Locations of structures/impervious surfaces upon completion Y ➤ Locations of construction support activity areas NA <i>Part 7.2.6.1</i>	Y	<input checked="" type="checkbox"/> N	
<ul style="list-style-type: none"> ➤ Locations of surface waters/wetlands, within or in immediate vicinity Y ➤ Indicates waters listed as impaired, and Tier 2, Tier 2.5, or Tier 3 Y(Impaired) / N(Tier 2) <i>Part 7.2.6.2</i>	Y	<input checked="" type="checkbox"/> N	
<ul style="list-style-type: none"> ➤ Boundary lines of natural buffers <i>Parts 7.2.6.3, 2.1.2.1a</i>	Y	N	Not applicable
<ul style="list-style-type: none"> ➤ Areas of federally-listed critical habitat for endangered or threatened species <i>Part 7.2.6.4</i>	Y	N	Not applicable / Not described in SWPPP
<ul style="list-style-type: none"> ➤ Topography Y ➤ Existing vegetative cover Y (aerial photos) ➤ Drainage pattern of stormwater/authorized non-stormwater flow onto, over, and from site <u>before and after</u> major grading Y <i>Part 7.2.6.5</i>	<input checked="" type="checkbox"/> Y	N	
<ul style="list-style-type: none"> ➤ Stormwater and allowable non-stormwater discharge locations Y ➤ Locations of storm drain inlets on site and immediate vicinity Not updated ➤ Locations stormwater or allowable non-stormwater will be discharged to surface waters (including wetlands) on or near site Y <i>Part 7.2.6.6</i>	Y	<input checked="" type="checkbox"/> N	Not updated with inlet observed along NM 501.
<ul style="list-style-type: none"> ➤ Locations of potential pollutant-generating activities <i>Part 7.2.6.7, Part 7.2.7</i>	Y	<input checked="" type="checkbox"/> N	Previous location of portable toilet (both source and control) described in inspection report not shown.
<ul style="list-style-type: none"> ➤ Locations of control measures <i>Part 7.2.6.8</i>	Y	<input checked="" type="checkbox"/> N	Not updated. Location and installation dates of check dams, and wattle or gravel bags shown. Removal dates not. Site map with topography General Note #3 stated "Access road will be stabilized with gravel." Gravel for access road was not observed. It did not appear that in-channel gravel bags observed on the day of this inspection were located on site map(s).
<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	Not applicable / no on-site storage areas shown or described in SWPPP

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

Construction Site Pollutants			Notes:
Includes pollutant-generating activities list and description? <i>Part 7.2.7.1</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Includes inventory of pollutants or constituents? <ul style="list-style-type: none"> ➤ Inventory Y ➤ Potential spills/leaks Y ➤ Departures from manufacturer's specifications for applying fertilizers containing nitrogen & phosphorus NA <i>Parts 7.2.7.2, 2.3.5.1</i>	Y	<input checked="" type="checkbox"/> N	Not updated (clarification appeared needed). Use of fertilizers was identified in seeding specifications and seeding descriptions in SWPPP. Specification in SWPPP stated, " <i>all seeding operations must include fertilizer.</i> " According to on-site representatives, no fertilizers were used.
Identifies all sources of allowable non-stormwater discharges? <i>Parts 7.2.8, 1.3.d</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
If required (surface water w/50 feet of earth disturbance), documents and describes <u>buffer compliance alternative</u> selected? <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, tape, or other similar marking device all natural buffer areas Y/N/NA ➤ 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 <i>Parts 7.2.9, 2.1.2, Appendix G</i>	Y	<input type="checkbox"/> N	Not applicable
As applicable, describes and documents <u>buffer exceptions</u>? <ul style="list-style-type: none"> ➤ Describes rationale/why infeasible to provide and maintain an undisturbed natural buffer of any size NA ➤ For linear project, describes buffer width retained and supplemental controls installed NA (not described) ➤ Small residential lot options NA ➤ Documents CWA Section 404 Permit, water-dependent structure/access disturbances Y <i>Parts 7.2.9; 2.1.2.1e, Appendix G</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

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

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 Y ➤ Specific sediment controls installed and made operational prior to conducting earth-disturbing activities Not documented ➤ For exit points, stabilization techniques and any additional controls planned to remove sediment prior to vehicle exit N ➤ For linear projects (if applicable), where/why it has been determined that the use of perimeter controls is practicable NA (not described) <p><i>Part 7.2.10.1</i></p>	<p>Y</p> <p><input type="checkbox"/> N</p>	<p>Not documented for existing project / not updated. According to site map, check dams (gravel bags) installed 09/14/2012. Reason for delay in installing temporary controls not described (see previous notes on sequence). See notes below on exit point. See notes below on added berms and/or water bars recorded on corrective action reports. Berm design and maintenance information contained in SWPPP, but use and timeframe for installation on this project was not (see Section 2 of SWPPP).</p>
Erosion and Sediment Controls		Notes:
<p>Minimizes area of disturbance?</p> <p><i>Part 2.1.1.1</i></p>	<p><input checked="" type="checkbox"/> Y</p> <p><input type="checkbox"/> N</p>	
<p>Describes erosion and sediment control <u>design</u> requirements?</p> <ul style="list-style-type: none"> ➤ Accounts for expected amount, frequency, intensity, duration of precipitation Y ➤ Accounts for nature of run-on and run-off (channelized peak flow rates & total volume at outlet) Y ➤ Accounts for range of soil particle sizes (distribution, erosivity and cohesiveness) Y ➤ Directs discharge to vegetated areas to increase sediment removal and infiltration unless infeasible NA ➤ Uses velocity dissipation, if necessary Y ➤ Complies with State of New Mexico except Indian country requirements: <ul style="list-style-type: none"> ○ Includes site-specific BMPs/controls designed to prevent to the maximum extent practicable an increase in sediment yield/flow velocity from pre-construction, pre-development conditions both during and after construction Y ○ Selection based on appropriate soil loss prediction models (results in sediment yields/flow velocities, that to the maximum extent practicable, will not be greater than the sediment yield levels and flow velocities from pre-construction, pre-development conditions) Y <p><i>Parts 2.1.1.2, 9.4.1.1</i></p>	<p>Y</p> <p><input type="checkbox"/> N</p>	<p>Not documented / not contained in SWPPP during this inspection.</p> <p><u>Comment:</u> Soil loss prediction model results (pre, during and post construction) which did comply with State of New Mexico requirements were made available for review following this inspection.</p>
<p>Describes erosion and sediment control <u>installation</u> 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 Not documented ➤ Installs all other controls and makes operational as soon as conditions allow N ➤ Uses good engineering practices and follows manufacturer's specifications or explain departures Y <p><i>Part 2.1.1.3</i></p>	<p>Y</p> <p><input type="checkbox"/> N</p>	<p>Not documented for existing project. See notes above (e.g., check dams and berms).</p>

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

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

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

<p>Describes <u>constructed conveyance channel</u> controls (if installed)? <i>Part 2.1.3.1</i></p>	Y	N	
<p>Describes <u>sediment basin design</u> (if installed) and maintenance (maintain at least ½ of capacity at all times)? <i>Part 2.1.3.2</i></p>	Y	N	Does not appear applicable. See implementation notes below.
<p>Describes <u>treatment chemical</u> controls (if used)? <i>Part 2.1.3.3</i></p>	Y	N	Not applicable
<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 ➤ 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>	Y	N	Not applicable
<p>Describes <u>dewatering</u> controls (if installed)? <i>Part 2.1.3.4</i></p>	Y	N	Dewatering was listed as a possible non-stormwater discharge in SWPPP. Some requirements in Part 2.1.3.4 of 2012 CGP were not described in SWPPP to ensure compliance, if dewatering occurred. According to on-site representatives, no dewatering from construction activities was needed for project.

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

Stabilization Requirements	Notes:		
<p>Describes compliance with deadlines for vegetative and/or non-vegetative stabilization practices, including exceptions?</p> <p><u>Deadline to Initiate</u></p> <ul style="list-style-type: none"> ➤ Initiates stabilization immediately (no later than end of next work day following earth-disturbing activities permanently/temporarily ceased) N <p><u>Deadline to Complete</u></p> <ul style="list-style-type: none"> ➤ As soon as practicable, but no later 14 calendar days after initiation, completes stabilization (for vegetative, all activities to initially seed or plant, and/or for non-vegetative, installation or application) NA ➤ 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 Not described ➤ Documents/describes circumstances beyond control that prevent meeting deadlines NA ➤ If discharging to sediment or nutrient-impaired waters or Tier 22.5 or 3 waters, completes stabilization (vegetative or non-vegetative) w/7 calendar days after temporary or permanent cessation Y <p><i>Parts 7.2.10.3, 2.2.1, 3, 9.4.1.3</i></p>	Y	<input type="checkbox"/> N	<p>SWPPP stated, “<i>Stabilization measures will be initiated as soon as practical,</i>” but not “<i>immediately</i>” as required in 2012 CGP.</p>
<p>Describes compliance with vegetative (final) stabilization criteria?</p> <ul style="list-style-type: none"> ➤ Provides uniform vegetation (e.g., evenly distributed, without large bare areas) perennial vegetative cover with a density of 70% of the native background vegetative cover for all unpaved areas / areas not covered by permanent structures Y ➤ 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 <p><i>Parts 7.2.10.3, 2.2.2.a, 3, 9.4.1.4</i></p>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

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

<p>If applicable, describes compliance with State of New Mexico, except Indian country, arid, semi-arid areas, or drought stricken option for final stabilization:</p> <ul style="list-style-type: none"> ➤ Area seeded/planted must w/3 yrs provides established vegetation that achieves 70% of the native background vegetative cover Y/N ➤ Selects, designs, and installs non-vegetative erosion controls that provide cover for at least 3 years without active maintenance Y/N ➤ Complies with notification, inspection maintenance, and reporting) Y/N <p><i>Parts 7.2.10.3, 2.2.2.b, 3, 9.4.1.5</i></p>	Y	N	Use of option not described in SWPPP
<p>If using, provides effective non-vegetative cover to stabilize?</p> <p><i>Parts 7.2.10.3, 2.2.2.2</i></p>	<input checked="" type="checkbox"/>	N	See implementation notes.

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

Pollution Prevention Procedures			Notes:
Describes procedures for <u>spill prevention and response</u>? <i>Parts 7.2.11.1, 2.3.4</i>	<input type="checkbox"/> Y	N	
Describes procedures for <u>waste management</u>? <i>Part 7.2.11.2, 2.3.3.3</i>	<input type="checkbox"/> Y	N	
Eliminates prohibited discharges? <ul style="list-style-type: none"> ➤ Concrete washout, unless managed by control in Part 2.3.3.4 NA (activity not described) ➤ Washout/cleanout of stucco, paint, form release oils, curing compounds and other materials unless managed by control in Part 2.3.3.4 N (activity not described in SWPPP) ➤ Fuels, oils or other from vehicle and equipment O&M Y ➤ Soaps, solvents, or detergents used in vehicle and equipment washing N (activity not described in SWPPP) ➤ Toxic or hazardous substances from spill/release Y <i>Part 2.3.1</i>	Y	<input type="checkbox"/> N	Some activities were not described in SWPPP even though concrete was listed as potential pollutant. SWPPP does not clearly prohibit some activities (or describe control measures or procedures) to ensure compliance with Part 2.3.
Properly maintains and protects all pollution prevention controls? <i>Part 2.3.2</i>	<input type="checkbox"/> Y	N	
Complies with pollution prevention standards for certain activities? <ul style="list-style-type: none"> ➤ Fueling/maintenance of equipment or vehicles Y ➤ Washing of equipment and vehicles N (activity not described in SWPPP) ➤ Storage, handling, disposal of materials, products and waste Y ➤ Washing applicators/containers N (activity not described in SWPPP) <i>Part 2.3.3</i>	Y	<input type="checkbox"/> N	See notes above
Minimizes discharge/complies with restrictions of <u>fertilizer application</u>? <i>Part 2.3.5</i>	Y	<input type="checkbox"/> N	Not updated (clarification needed). For permanent seeding, SWPPP stated, “ <i>apply fertilizer and/or lime as soil conditions require.</i> ” Part 2.3.5 (Fertilizer Discharge Restrictions) of 2012 CGP were not described in SWPPP. According to on-site representatives, no fertilizer was used for project.

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

Inspections and Corrective Action		
<p>SWPPP describes procedures for <u>inspection, maintenance, and corrective action</u>?</p> <ul style="list-style-type: none"> ➤ Personnel conducting inspections Y ➤ Inspection schedule Y ➤ Reduction of inspection frequency Y <p>As applicable:</p> <ul style="list-style-type: none"> ○ location of the rain gauge or the address of weather station to obtain rainfall data Y ○ beginning and ending dates of the seasonally-defined arid period for your area or the valid period of drought NA (not described) ○ beginning and ending dates of frozen conditions NA <ul style="list-style-type: none"> ➤ Inspection or maintenance checklists or other forms that will be used Y <p><i>Parts 7.2.12</i></p>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>But, project's normal business hours or normal working hours were not documented in SWPPP. See inspection notes below.</p> <p><u>Comment:</u> Increased frequency of inspection is due to discharges into Tier 2 water, not impaired water as indicated in SWPPP. Water Canyon is not listed as sediment or nutrient-impaired water.</p>
Inspections	Notes:	
<p>Inspections performed by "qualified" person?</p> <p><i>Part 4.1.1</i></p>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
<p>Conducts inspections at a minimum of required frequency unless reductions documented?</p> <ul style="list-style-type: none"> ➤ Every 7 days <u>or</u> 14 days & w/in 24 hrs of a 0.25" rain event Y/N <p><i>Part 4.1.2</i></p>	<input type="checkbox"/> Y <input type="checkbox"/> N	<p>Not applicable</p>
<p>If applicable, conducts increased inspection frequency for sites with discharges to sediment or nutrient-impaired waters or Tier 2, 2.5 or 3 waters:</p> <ul style="list-style-type: none"> ➤ Once every 7 days Y/N; <u>and</u> ➤ Within 24 hrs of a ≥ 0.25" rain event Y/N? <p><i>Parts 4.1.3, 3.3.2.1, 3.3.2</i></p>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>The first recorded inspection under the 2012 CGP was on 06/05/2012. Reason for delay was not documented. The following inspections were over 7 days from the previous inspection, as indicated in reports contained in SWPPP: rain event inspection on 07/12/2012 (9 days); rain event inspection on 10/15/2012 (14 days), and routine inspection on 10/29/2012 (14 days). Inspection for rain event occurring on 09/28/2012 (Friday—no times recorded in SWPPP) was on 10/01/2012 (Monday 1:30). Inspection for rain event occurring on 10/12/2012 (Friday at 15:28:15") was on 10/15/2012 (Monday at 2:20). It was not documented that inspection met frequency requirements, including permit notes (i.e., inspection when storm event is still continuing, safety or working hours) of the 2012 CGP.</p>
<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 ➤ For arid/semi arid during seasonally dry period or drought-stricken areas - 1/mo and w/24 hrs of the occurrence of a storm event ≥ 0.25" NA (not described) ➤ For frozen conditions (runoff unlikely, disturbance suspended, areas stabilized) - suspends until thawing conditions NA <p><i>Part 4.1.4.1 thru 3</i></p>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	

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

<p>Inspection areas includes:</p> <ul style="list-style-type: none"> ➤ All cleared, graded, excavated, and not completed stabilization Y ➤ All controls/measures Not documented ➤ Material/waste/borrow/equipment storage and maintenance areas Y ➤ All areas stormwater typically flows Y ➤ All points of discharge Y ➤ All locations stabilization implemented Y <p><i>Part 4.1.5</i></p>	Y	<input type="checkbox"/> N	<p>Not documented. Inspection reports indicated site areas inspected included “<i>all installed stormwater controls.</i>” But, specific controls not listed or otherwise indicated on report or procedures (e.g., waste bins described in SWPPP, portable toilet, in-channel gravel bags downstream of site, berms completed 06/06/2012, materials cover completed 7/12/2012, water bar completed on 8/21/2012).</p>
<p>Inspection includes minimum requirements?</p> <ul style="list-style-type: none"> ➤ Controls installed/operational Y ➤ Determines need to replace, repair, or maintain Y ➤ Conditions that could lead to spills, leaks, and accumulations of pollutants Y ➤ Identifies where new or modified controls are necessary Y ➤ At points of discharge, checks for visible erosion/sedimentation on banks Y ➤ Identifies noncompliance Y ➤ If discharge is occurring: <ul style="list-style-type: none"> ○ Identifies all points of discharge Y ○ Observes/documents visual quality, including color, odor, floating, settled, or suspended solids, foam, oil sheen, and other of pollutants N ○ Documents whether controls operating effectively, and describes controls not operating as intended or need maintenance Y ➤ Based on results of inspection, initiates corrective action under Part 5. Y (reports) <p><i>Part 4.1.6</i></p>	Y	<input type="checkbox"/> N	<p>Inspection report for 08/16/2012 stated, “<i>Discharge is muddy from recent clean-out in channel.</i>” But, not all required observations on visual quality described.</p>
<p>Inspection reports:</p> <ul style="list-style-type: none"> ➤ Completed within 24 hrs N (signed/certified) ➤ Includes inspection date Y ➤ Includes names/titles of personnel Y ➤ Includes summary of findings Y ➤ Includes applicable rain gauge reading N (10/01/2012 and 10/15/2012) ➤ Signed and certified in accordance with Appendix I.11 N = LANS, Y = SCC <p><i>Part 4.1.7.1 and 2</i></p>	Y	<input type="checkbox"/> N	<p>LANS and SCC completed (signed/certified) the 08/17/2012 inspection report on 08/29/2012 (12 days) after inspection. The 07/25/2012 inspection report appeared to have incorrect rain fall event recorded on report (0.43” and not the total for the day on which was listed as 0.55” on other information contained in SWPPP). Gauge information was contained in SWPPP, but readings were not on signed/certified completed report for inspections on 10/01 and 10/15/2012.</p> <p>LANS - See additional notes below on duly authorized representative</p> <p>SCC – SCC completed (signed/certified) two inspection reports on 7/30/2012, which was five (5) days after date of inspection on 7/25/2012 and four (4) days after date of inspection on 7/26/2012. It was also noted, that the time of signatures were not recorded to confirm that the 08/28/2012 inspection report signed/certified by SCC on 08/29/2012 was completed within 24 hours.</p>

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? <i>Part 5</i></p>	Y	<input type="checkbox"/> N	<p>For example, needs identified on corrective action report dated 07/03/2012 were not recorded to have been completed until 07/12/2012. Removal of asphalt stockpile and add gravel bags identified on inspection and corrective action report dated 07/12/2012 were not recorded to have been completed until inspection on 07/26/2012. Need for management of waste (construction waste in pile on ground) was identified on 11/05/2012, but not corrected immediately or day after inspection. Reasons for delays (if infeasible) were not documented.</p> <p>Corrective action report dated 08/9/2012 stated, “<i>Run on controls on road (all sides) have not been installed. Complete install of controls (C/As from 7/25/12)... immediately.</i>” It is not clear from subsequent reports when, if at all, this action was completed. It is not clear if the need for water bars completed on 08/21/2012 met the need for run on controls identified on 07/25/2012.</p>
<p>Within 24 hours of discovering the occurrence, completes a report of the following:</p> <ul style="list-style-type: none"> ➤ Condition identified Y ➤ Nature of the condition identified Y ➤ Date and time of the condition identified and how it was identified Y <p><i>Part 5.4</i></p>	<input checked="" type="checkbox"/> Y	<input 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 Not documented ➤ Summary of stormwater control modifications taken or to be taken Y ➤ Schedule of activities necessary to implement changes N ➤ Date the modifications are completed or expected to be completed Not documented ➤ Notice of whether SWPPP modifications are required as a result of the condition identified or corrective action N ➤ Signed and certified in accordance with Appendix I.11 N <p><i>Parts 5.4.2, 5.4.3</i></p>	Y	<input type="checkbox"/> N	<p>7-Day Corrective Action Follow Up Reports have column for “<i>Date completed...Or date modifications are expected</i>”. It is not indicated if the dates recorded on the reports are actual completion dates or expected.</p> <p>7-Day Corrective Action Follow Up report indicated that additional berm was added on 06/06/2012, but the SWPPP described measures and site map were not modified. Need for SWPPP modification not indicated on corrective action reports.</p> <p>7-Day Correction Action Follow Up reports for repairs identified on 06/05/2012, 07/03/2012, 07/12/2012, 07/19/2012 Inspection and 24 Hour Reports were not signed and certified. Also, annotations appear to have been added to Corrective Action Reports after the reports were signed/certified on 7/19/2012 and 08/16/12. Corrections were not signed/certified by duly authorized representative. See additional notes below on LANS duly authorized representatives</p>

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

Additional Notes on SWPPP Review (optional)

Introduction

A Compliance Evaluation Inspection (CEI) was conducted at the Water Canyon storm drain reconstruction project on NM 501 within Los Alamos National Laboratory (LANL) by Erin S. Trujillo, accompanied by Bruce Yurdin, both of the NMED Surface Water Quality Bureau (SWQB) on 12/06/2012. LANL is jointly operated by the U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA), Los Alamos Site Office (LASO) and Los Alamos National Security, LLC (LANS). The purpose of this inspection was to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act and 2012 Construction General Permit (CGP). The inspector made introductions, explained the purpose of this inspection and presented credentials to Mr. Lemke upon arrival at LANS ENV-RCRA offices. The inspector, Mr. Yurdin, Mr. Lemke, Mr. Zimmerly, and Mr. Lincoln toured the construction site. An exit interview to discuss the preliminary findings of this inspection was conducted at the LANS ENV-RCRA offices with the on-site LANS and SCC representatives, other LANS staff, and Gene E. Turner, Environmental Permitting Manager, Env. Projects Office, Los Alamos Site Office. According to Gene Turner, LASO, NNSA-LASO is not an operator of this construction activity having control over plans and specifications.

This report is based on a review of the USEPA online notice of intent (eNOI) database; review of files maintained by the permittee and operator, including on-site stormwater pollution prevention plan (SWPPP) completed for the 2012 CGP, and NMED; on-site observation by NMED personnel; and verbal information provided by the permittee and operator representatives. LANS leadership and organization information was reviewed at <http://www.lansllc.com/> and <http://lanl.gov/index.php> following this inspection.

LANS Signature Authorization

LANS letters for duly authorized representatives to sign SWPPP and reports were signed by corporate management that no longer held or acted in position title. LANS letter dated 03/02/2009 was signed by the former Associate Director, Environment, Safety, Health (J. Chris Cantwell). LANS letter dated 03/04/2009 regarding corporate policies for signatures was signed by a former LANS director.

Eligibility of Construction Support Areas

SWPPP stated that the project site will include, “...*the soil stockpile/staging area at the TA-16 Borrow Pit area approximately one mile north*” and “*a base course stockpile area located near the northeast entry area of TA-16.*” These equipment staging and material storage areas appear to serve multiple unrelated construction and maintenance projects at LANL; and would continue to operate beyond this project according to on-site LANS representatives. Therefore, it does not appear that stormwater discharges from the off-site support areas would be eligible for permit coverage under the 2012 CGP. On-site LANS representatives were informed that these areas may be eligible for coverage under the USEPA industrial stormwater multi-sector general permit (MSGP) by this inspector.

NOI Notice

The need for posting NOI information was identified on the 07/25/2012 Inspection Report and 08/09/2012 Corrective Action Report. Completion date for this action does not appear to be documented. A notice was not posted on the day of this inspection.

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> All areas within project limits had been disturbed. Flagging to indicate historic properties remained. Tree branch removal was observed outside project limits, but soil exposed was minimal. On-site disturbance was also minimized by the use of off-site areas on LANL property for equipment staging and material storage.
Buffer compliance:	<i>(e.g., provide and maintain a 50-foot undisturbed natural buffer)</i> Not applicable for construction approved under CWA Section 404 permit.
Perimeter controls:	<i>(e.g., filter berms, silt fences, temporary diversion dikes)</i> Construction had ceased. Temporary perimeter controls removed. See notes below on in-stream controls.
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> Construction had ceased. Parking area to access site appeared stabilized with gravel.
Stockpiled sediment or soil:	<i>(e.g., berms, dikes, fiber rolls, silt fences, sandbag, gravel bags)</i> Construction had ceased. No stockpiled sediment or soil remained.
Minimize dust:	<i>(e.g., application of water or other dust suppression techniques)</i> Construction had ceased. Final stabilization initiated. No dust generation observed.
Steep slopes:	<i>(e.g., standard erosion and sediment control practices, phasing disturbances, stabilization practices)</i> Construction had ceased. Final stabilization initiated.
Preserve topsoil:	<i>(e.g., stockpiling or transfer of topsoil to other locations)</i> Construction had ceased. No preservation of topsoil described in SWPPP.
Soil compaction:	<i>(e.g., restrict vehicle / equipment use, soil conditioning techniques)</i> Construction had ceased. Vehicles appear to be restricted (temporarily) from hydromulch, geotextile and seeded areas by guard rail and large boulders. Need, if any, for measures to restrict vehicles and equipment on seeded areas until final stabilization met was not described in SWPPP.
Storm drain inlet protection:	<i>(e.g., fabric filters, sandbags, concrete blocks, gravel barriers)</i> Inlet protection did not appear required on day of this inspection. Installed storm drain inlet on NM 501 did not appear to have flow from this construction activity.

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

Erosion and Sediment Control Practices - Continued	
Conveyance channels:	<p><i>(e.g., erosion controls, and velocity dissipation check dams, sediment traps, riprap, or grouted riprap at outlets)</i></p> <p>In-stream conveyance channels (shallow swale graded for Water Canyon watercourse, velocity dissipation rock check dams and basin) were installed under CWA Section 404 permit.</p> <p>Other culvert outlets had velocity dissipation controls (in this case concrete and/or wire enclosed rip rap).</p>
Sediment basin:	<p><i>(e.g., outlet structures that withdraw from the surface, stabilization, erosion controls, velocity dissipation, kept at least ½ design capacity)</i></p> <p>Requirements do not appear applicable. In-stream or floodplain basins did not appear to be sediment basins primarily for stormwater control for this construction activity. According to the SWPPP, permanent stabilization measures in the channel are to reduce erosivity of flows and provide stabilization. Neither basin was described as a temporary sediment control measure during construction in SWPPP. Final stabilization (hydromulch, seeding, geotextile mat) had been initiated for a shallow sediment-basin upstream of the new box culvert that would receive water from high stream flows. A second in-stream basin for velocity dissipation constructed downstream of the box culvert was stabilized with a concrete material.</p>
Treatment chemicals:	<p><i>(e.g., spill berms, decks, spill containment pallets, storing chemicals in covered area, spill kit available on site)</i></p> <p>No storage of treatment chemicals on site. Soil stabilizer and additives listed for dust control, but SWPPP did not describe the use of treatment chemicals to reduce turbidity in retained stormwater.</p>
Dewatering:	<p><i>(e.g., sediment basins or sediment traps, sediment socks, dewatering tanks, tube settlers, weir tanks, or filtration systems (e.g., bag or sand filters) designed to remove sediment)</i></p> <p>No construction dewatering observed on site. Area had several flowing springs or seeps. According to LANS and SCC on-site representatives, no dewatering was required during construction.</p>
Other erosion and sediment controls or practices:	<p><i>(Provide brief description)</i></p> <p>In-stream gravel bags that were installed downstream of the project had not been removed. Bags appeared damaged and not maintained. According to on-site operator representative, gravel bags were removed after tour on day of this inspection.</p>

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

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>Stabilization included asphalt, concrete, rock, gabions, hydromulch with tackifier and geotextile mat (mesh) and seed. Final stabilization is not anticipated to be complete until after the summer thunderstorm season of 2013 according to LANS on-site representatives.</p>
Are stabilization measures initiated immediately? Not documented Are they completed within 14 days of construction cessation? Not documented	<p><i>(e.g. indicate “yes” or “no”; if not within 14 days of construction cessation, how long without stabilization measures?)</i></p> <p>Actual date that activities ceased on upstream side of project was not documented. Present phase of construction was not described on 10/29/2012 inspection report. Stabilization appeared to have been initiated on upstream side of project on 11/05/2012 according to 11/05/2012 inspection report. Stabilization activities for entire project limits appear to have been completed on 11/20/2012 according to 11/20/2012 inspection report.</p> <p><u>Comment:</u> Deadlines For Sites Discharging To Sensitive Waters Note in 2012 CGP: “If you qualify for the deadlines for initiating and completing stabilization in Part 2.2.1.3a or b, you may comply with the stabilization deadlines in Part 2.2.1.3a or b for any portion of your site that discharges to a sensitive water.”</p>
Pollution Prevention Measures Part 2.3	
Fueling and maintenance of vehicles:	<p><i>(e.g., locating activities away from surface waters and stormwater inlets or conveyances, providing secondary containment (e.g., spill berms, decks, spill containment pallets) and cover where appropriate, and/or having spill kits readily available)</i></p> <p>No evidence of fueling and maintenance of vehicles on site observed.</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 evidence of washing equipment & vehicles on site observed.</p>
Washing applicators/containers (e.g., stucco, paint, concrete, form release oils, curing compounds, and other construction materials)	<p><i>(e.g., leak-proof container or pit, locate as far away as possible from surface waters, inlets or conveyances, designate areas)</i></p> <p>No evidence of washing of applicators/containers on site observed.</p>

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

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 observed</p>
	<p><i>Pesticides, herbicides, insecticides, fertilizers, and landscape materials:</i></p> <p>None observed</p>
	<p><i>Diesel fuel, oil, hydraulic fluids, other petroleum products, and other chemicals:</i></p> <p>None observed.</p>
	<p><i>Hazardous or toxic waste (e.g. paints, solvents, petroleum-based products, wood preservatives, additives, curing compounds, acids):</i></p> <p>None observed</p>
	<p><i>Construction and domestic waste (e.g., packaging materials, scrap construction materials, masonry products, timber, pipe and electrical cuttings, plastics, styrofoam, concrete, and other trash or building materials):</i></p> <p>A small pile of metal (bolts and washers) was observed in the northwest corner at the edge of the project limits. It could not be determined if this debris was attributed to this construction activity, but the debris above the stream channel should be removed from the site (disposed and/or recycled). Removal of temporary controls (gravel bags) was previously noted.</p>
	<p><i>Sanitary waste:</i></p> <p>Construction had ceased. No portable toilet remained on site.</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>Construction had ceased. No fertilizer storage observed.</p>
Miscellaneous	
Evidence of not allowable non-storm water discharges or prohibited discharge?	<p><i>(Provide brief description and determine whether any non-storm water discharges allowable)</i></p> <p>Construction had ceased. No construction non-stormwater discharges observed.</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>None observed. Water Canyon was not flowing above NM 501. Flow from springs or seeps below NM 501 entered Water Canyon within construction activity site limits. Receiving water in Water Canyon below permanent structures and construction limits was clear and not turbid.</p>

**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Tim Zimmerly, LANS
as directed by Erin S. Trujillo

Date: 12/06/2012

Time: 1156 hours

City/County: Los Alamos County

State: New Mexico

Location: Water Canyon storm drain reconstruction project at NM 501 (West Jemez Road) approximately 1/3 miles north of NM 4, Los Alamos National Laboratory (LANL), Los Alamos County, New Mexico

Subject: Arrows point to temporary measures, green fabric wattles/socks (called gravel bags according to SWPPP and on-site representatives), that remained in channel of Water Canyon below construction activity. Wattles were not maintained. Final stabilization had been initiated for disturbed areas above this location.

