May 2, 2024

James Tolman, CPESC
Inspections Plus Inc.
504 El Paraiso Rd. NE Suite B
Albuquerque, NM 87113-1590

Re: Old Chevron Terminal at 3200 Broadway Blvd SE
Erosion and Sediment Control Plan
Engineer's Stamp Date 4/25/24 (M14E038)

Mr. Tolman,

Based on the information in your submittal received on 4/4/26, the ESC plan cannot be approved until the following comments are addressed. Since the limits of disturbance encompass the entire 7 acre site and there aren't any stabilization specifications in the submitted ESC, it appears that there is more to this development than is shown on the submitted sheets, so there may be additional comments when the rest of the plans are submitted.

If, instead, you intended for the owner, ABQ Terminal, LLC, to have CGP coverage for the demolition of the buildings ONLY, then you must submit a plan showing the limits of disturbance for the buildings only, the associated work areas, the controls for those areas only, and stabilization specifications for those disturbed areas only. Either way, there may be additional comments when the revised plans are submitted, and you must address the following comments before the property owner's ESC Plan and NOI will be approved for any permits.

1. The ESC Plan can't be approved until after Hydrology approves the G&D Plan for each specific purpose, Site Plan, Grading, Building Permit, and Work Order. The only purpose Hydrology has approved so far is the Site Plan. The existing and proposed grades must be shown on the ESC Plan, and they must agree with the Grading Plan approved by Hydrology (CGP7.2.4.b.ii).

2. This ESC Plan doesn't identify the conditions ABQ Terminal, LLC., the property owner, will provide to terminate permit coverage as required in CGP 8.2. Instead, the last step in the construction sequence says "*Coronado Wrecking & Salvage will then transfer the SWPPP and site to Loves Travel Central for the development and building phase.*" The only ESC Plan required by the City of Albuquerque is for the property owner, ABQ Terminal, LLC. It must include site-specific interim and permanent stabilization specifications per CGP 9.6.1.c.i. Include specifications and schedules to comply with all aspects of CGP 2.2.14. and identify the complete sequence necessary to satisfy the Conditions for Termination of CGP Coverage per CGP 8.2. for ABQ Terminal, LLC., instead of those for Coronado Wrecking & Salvage.

3. The requested documentation was not provided to show that Spencer Haines is a responsible corporate officer of ABO Terminal LLC, the property owner, as required by CGP Appendix G 11.1. and the city ordinance § 14-5-2-11. The person who signs the certification statement at the end of the NOI must be a "responsible corporate officer" as required in CGP G.11.1. Provide the operating agreement or similar documentation that Spencer Hanes or another member satisfies the CGP's requirements. The officer may delegate his signatory authority to another member of the corporation in accordance with CGP G.11.2 for the purpose of signing the remaining documents in the SWPPP and the required reports.

4. The downstream edge of this 7-acre site receives too much drainage for a silt fence alone. The Silt fence should be used in conjunction with berms and sediment basins sized to control the drainage from this 7-acre site per CGP 2.2.12. Sediment Basins must be designed and stamped by a registered Professional Engineer (PE), not a Certified Professional in Erosion and Sediment Control (CPESC). Your BMPs must be sized for the area that drains to them, all of the area, not just the onsite disturbed portion of the drainage area.

5. The SWPPP must describe design specifications, construction specifications, maintenance schedules (including a long-term maintenance plan), inspection criteria, and the expected performance and longevity of the BMPs per CGP 9.6.1.c.i. Specifications for "Weighted Gator Guard" and the other BMPs are missing from the SWPPP. Include all these specifications for the BMPs in the ESC Plan on the detail sheet(s).

6. Add a note requiring the demolition contractor to *"Provide waste containers (e.g., dumpster, trash receptacle) of sufficient size and number to contain construction and domestic wastes per CGP 2.3.3.e, including demolition debris per footnote #53.*
    a. *For waste containers with lids, keep waste container lids closed when not in use, and close lids at the end of the business day and during storm events.*
    b. *For waste containers without lids, provide either Cover (e.g., a tarp, plastic sheeting, temporary roof) to minimize exposure of wastes to precipitation or a similarly effective means designed to minimize the discharge of pollutants (e.g., secondary containment)."*

7. Add additional notes and ESC BMPs to comply with CGP 3.2.
    a. Note - *"Caution: this site will discharge to a water that is impaired for polychlorinated biphenyls (PCBs), and you are engaging in demolition of a structure with at least 10,000 square feet of floor space built or renovated before January 1, 1980. Select appropriate personal protective equipment and tools that minimize dust and heat (<212°F). For additional information, refer to Part 2.3.3 of the CGP Fact Sheet."*
    b. Note - *"Provide documentation in the SWPPP that shows the disposal of such materials is performed in compliance with applicable State, Federal, and local laws."*
    c. Identify controls on the ESC Plan to minimize the exposure of PCB-containing building materials, including paint, caulk, and pre-1980 fluorescent lighting fixtures, to precipitation and stormwater. Separate work areas from non-work areas and construct a containment area so that all dust or debris generated by the work remains within the protected area.

8. Update the engineer's stamp date each time the plan changes.

If you have any questions, contact me at 924-3420 or jhughes@cabq.gov.

Sincerely,
James D. Hughes, P.E., CPESC

James D. Hughes

Principal Engineer, Planning Dept.
Development and Review Services