

**Region 6 - Enforcement & Compliance Assurance Division**  
**INSPECTION REPORT**

|                                        |                                       |                        |
|----------------------------------------|---------------------------------------|------------------------|
| Inspection Date(s):                    | 10/30/2019                            |                        |
| Media <b>Program</b> :                 | Water                                 |                        |
| Regulatory Program(s)                  | NPDES                                 |                        |
| Company Name:                          | <b>Praxis Ltd.</b>                    |                        |
| Facility Name:                         | <b>Las Campanas- Single Family DU</b> |                        |
| Facility Physical Location:            | 72 W Wildflower                       |                        |
| (city, state, zip code)                | Santa Fe, New Mexico 87525            |                        |
| Mailing address:                       | Unit 310B 1012 Marquez Pl.            |                        |
| (city, state, zip code)                | Santa Fe, New Mexico 87505            |                        |
| County/Parish:                         | Santa Fe                              |                        |
| Facility Phone Number                  | 505-473-7766}                         |                        |
| Facility Contact:                      | John Wagner                           | Office Manager         |
|                                        | John@praxisdesignbuild.com            |                        |
| FRS Number:                            | 110070549120                          |                        |
| Identification/Permit Number:          | NMR10023C                             |                        |
| Media Identifier Number:               | NA                                    |                        |
| NAICS:                                 | 238910                                |                        |
| SIC:                                   | 1799                                  |                        |
| Personnel participating in inspection: |                                       |                        |
| Gabriel Brown                          | Praxis Architects Inc.                | Project Manager        |
| David Esparza, PE                      | US EPA/ECDWM                          | Environmental Engineer |
| EPA Lead Inspector<br>Signature/Date   |                                       |                        |
|                                        | David Esparza                         | Date                   |
| Supervisor<br>Signature/Date           |                                       |                        |
|                                        | Carol Peters                          | Date                   |

## Section I – INTRODUCTION

### PURPOSE OF THE INSPECTION

EPA Region 6 inspector David Esparza, PE arrived at 72 W Wildflower Drive (Wildflower) at approximately 9:30 AM on October 30, 2019, for an unannounced compliance inspection. I met with Mr. Gabriel Brown, Praxis Architects (Praxis) at the opening conference. I presented my credentials to Mr. Brown and informed him that this was an EPA inspection to ascertain Praxis' compliance with the Clean Water Act (CWA). The generation of this report is based on information supplied by Praxis representatives, observations made by the United States Environmental Protection Agency (US EPA) inspector, and records and reports maintained by the permittee (Praxis), and the US EPA. This Compliance Evaluation Inspection (CEI) was conducted under the authority of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the CWA. Before leaving the Wildflower, an exit briefing was held with Mr. Brown to explain areas of concern noted at the time of the inspection.

### FACILITY DESCRIPTION

The following project description was paraphrased from the information provided to me during the onsite inspection, the project Wavier Eligibility Information (WEI) and an email on October 30, 2019. The construction (project) of the single-family dwelling unit (DU) is located approximately 1.2-miles west of New Mexico 599 (NM-599) (aka Veterans Memorial Highway) Las Campanas Subdivision, Santa Fe County, New Mexico (denoted in Aerial Image #1 below). Approximate coordinates to the project site are: Latitude 35°42'17.72" North, Longitude 106°00'41.78" West. Site hours are unknown. The overall project site equates to approximately 2.5-acres, of which 0.25-acres of disturbed land surface area is included. Furthermore, the project is approximately 0.35-miles north of the Arroyo de Los Frijoles. Praxis states project activities will include but not be limited to the following:

- Site Preparation: Installation of wire-mesh type fencing along the boundaries of the area of disturbance to provide vagrant debris from leaving the site and to delineate the construction boundary. Clearing and grubbing (vegetation removal) of project area to the extent necessary to complete the associated construction activities, and appropriate signage.
- Proposed improvements: Praxis stated the project is the construction of a new single-family DU measuring approximately 2,500-ft<sup>2</sup> in area, inclusive of all appurtenant utilities. The original project earthwork activities were exempt under an EPA Low Erosivity Wavier (LEW) (<https://lew.epa.gov>) for the DU. Initial activities were completed within the time frame of the first LEW. Several months after the initial earthwork was complete, the owner decided to add a swimming pool adjacent to the house. The associated pool construction activity was permitted separately; thus, a second LEW was applied for to address the pool portion of the project. Note: Wavier eligibility is based on a rainfall erosivity factor (R-Factor) less than five (5). The EPA online calculated project site R-Factor equates to 4.38.



**Aerial Image #1:** Overall view of the 72 W Wildflower, Las Campanas Subdivision, Santa Fe, New Mexico. Aerial from Google Earth Maps.

## Section II - OBSERVATIONS

The following is a brief summary of what I observed at the project location, was provided via email and conveyed in conversation.

- **Project Site Documentation-** As stated above I was informed the project is under the control and direction of Praxis Architects Inc. Praxis (operator) did make available all appropriately dated documentation, though the LEW was not posted. Furthermore, Mr. Brown stated he was cognizant of the seasonal limitations appurtenant to LEW certification.
- **Overall View of Site** – Praxis commenced the project activities or beginning of project (BOP) was prior to April 2019. Site clearing and grading (clearing and grubbing-vegetation removal) also commenced circa this date. End of Project (EOP) is scheduled for January 2020. Perimeter fencing was in place and in serviceable condition. No vagrant debris was observed in the adjacent arroyo (Southside of project location) or towards the Arroyo de Los Frijoles (Appendix 1 Photographs #1 through #5).

## Section III – AREAS OF CONCERN

I observed no areas on concern at the time of the inspection.

#### **Section IV – FOLLOW UP**

The following information was received by EPA after exiting the Facility on October 30, 2019 from Praxis Architects Inc.:

- A completed copy (electronic) of Praxis' Wavier Eligibility Information and a brief email description of project activities.

#### **Section V – LIST OF APPENDICES**

Appendix 1 – Photo Log – 5 photos taken 10/30/2019

Appendix 2 – Photograph copy of Praxis' Wavier Eligibility Information