**NEW MEXICO**
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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

**Certified Mail – Return Receipt Requested**

June 1, 2018

Mr. Hal Kading
President
Southwest Aviation
9050 Zia Blvd
Las Cruces, NM 88007

**Re: Southwest Aviation/ Las Cruces International Airport; MSGP; SIC 4581; NPDES Compliance Evaluation Inspection; NPDES# NMR053399; May 2, 2018**

Dear Mr. Kading:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility 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.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Robert Houston
US Environmental Protection Agency, Suite 1200
Enforcement Branch (6EN-WS)
1445 Ross Avenue
Dallas, Texas 75202-2733

Sarah Holcomb, Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

*/s/ Sarah Holcomb*

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Robert Houston, USEPA (6EN)
Darlene Whitten-Hill, USEPA (6EN) by e-mail
Michael Kesler, NMED District III by e-mail
Peter Bennett, City of Las Cruces 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 R 0 5 3 3 9 9 11 | 12 1 8 0 5 0 2 17 | 18 ~ | 19 S 20 | |

Remarks

S E C T O R S A I R T R A N S P O R T A T I O N

| Inspection Work Days | Facility Evaluation Rating | BI | QA | Reserved |
|---|---|---|---|---|
| 67 69 | 70 3 | 71 N 72 | N 73 74 | 75 80 |

**Section B: Facility Data**

| Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)* | Entry Time /Date | Permit Effective Date |
|---|---|---|
| Las Cruces International Airport, 8990 Zia Boulevard, Las Cruces, NM<br><br>I10 Exit 132 West of Las Cruces, North to Terminal<br><br>Dona Ana County | 1:20 pm 5/2/18 | 6-4-2015 |
| | Exit Time/Date<br>9:20 am 5/3/18 | Permit Expiration Date<br>6-4-2020 |

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Lori Romero/Administrative Assistant/505-541-2471
Josh Garcia/ Airfield Maintenance/505-541-2471

Other Facility Data

SIC CODE:
4581 Airports, Flying Fields, and Airport Terminal Services

Name, Address of Responsible Official/Title/Phone and Fax Number
Mr Hal Kading /President/ 575-524-8047
Southwest Aviation
9050 Zia Blvd
Las Cruces, NM 88007

Contacted
Yes [ ] No [x]

**Section C: Areas Evaluated During Inspection**
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

1. The Inspector arrived on site at 1:20PM on May 2, 2018 accompanied by Peter Bennett and Jacob Kidd from City of Las Cruces, and met with Ms. Lori Romero, where the purpose of the inspection was explained and credentials presented. Ms. Romero explained that the Manager was out of town and that the maintenance crew would be back at 6 am. The inspectors reviewed the onsite SWPPP documents, and the inspectors returned the next morning at 7 am to tour the site and to meet with Mr. Josh Garcia. They also briefly met with a staff member from Francis Aviation. No-one answered the door at Southwest Aviation. An exit interview was conducted with Mr. Garcia to discuss the preliminary findings of this inspection at approximately 9:00 am.

2. See attached report for findings and comments.

| Name(s) and Signature(s) of Inspector(s) | Agency/Office/Telephone/Fax | Date |
|---|---|---|
| **Jennifer Foote** */s/ Jennifer Foote* | **NMED/SWQB 505-827-0596** | **5/31/18** |
| **Signature of Management QA Reviewer** | **Agency/Office/Phone and Fax Numbers** | **Date** |
| **Sarah Holcomb, Program Manager** */s/ Sarah Holcomb* | **NMED/SWQB 505-827-2798** | **5/31/18** |

EPA Form 3560-3 (Rev. 9-94) Previous editions are obsolete.

# NPDES Industrial Storm Water Checklist (MSGP)

| National Database Information | | General | |
|---|---|---|---|
| Inspection Type | Compliance Evaluation | Inspector Name | Jennifer Foote |
| NPDES ID Number | NMR053390-Las Cruces International Airport<br>NMR053399- Southwest Aviation<br>NMR053400- Francis Aviation<br>NMU001968- Mesilla Valley Aircraft<br>NMU001967- Air Methods DBA Native Air | Telephone | 505-827-0596 |
| Inspection Date | May 2-3, 2018 | Entry Time | 1:20 PM |
| Inspector Type *(circle one)* | ☐EPA ☒State ☐EPA Oversight | Exit Time | 9:20 AM |
| Facility Sector/ SIC/Activity Code | Sector S<br>SIC4581 | Signature | */s/ Jennifer Foote* |

| Facility Location Information | | | | |
|---|---|---|---|---|
| Name/Location/ Mailing Address | Las Cruces International Airport<br>8990 Zia Blvd.<br>Las Cruces, NM 88007 | | | |
| GPS Coordinates | Latitude | 32.28274 | Longitude | -106.92047 |
| Receiving Water(s) | Unnamed Arroyo to Natzinger Arroyo thence to Rio Grande Segment 20.6.4.101 | | | |

| Contact Information | | |
|---|---|---|
| | Name(s) | Telephone |
| Name(s) and Role(s) of All Parties Meeting the Definition of Operator | NMR053390-Las Cruces International Airport<br>NMR053399- Southwest Aviation<br>NMR053400- Francis Aviation<br>NMU001968- Mesilla Valley Aircraft<br>NMU001967- Air Methods DBA Native Air | 575-541-2471<br>575-524-8048<br>575-526-6341<br>575-541-0878<br>303-792-7400 |
| Facility Contact | Lisa Murphy Airport Manager | 575-541-2471 |
| Authorized Official(s) | Las Cruces International Airport- Lisa Murphy<br>Southwest Aviation- Hal Kading<br>Francis Aviation- Nicholas Gogolew | 575-541-2471<br>575-524-8047<br>575-589-4586 |

| Basic Permit Information | | | Basic SWPPP Information | | |
|---|---|---|---|---|---|
| Permit Coverage | ☒ Y | ☒N | SWPPP Prepared & Available | ☒ Y | ☐N |
| Permit Type | ☒ General | ☐ Individual | SWPPP Contents Satisfactory | ☐ Y | ☒N |
| Operational Date | Airport 1943 | | SWPPP Implementation Satisfactory | ☒ Y | ☐N |
| NOI/Application Date | 4-26-16 | | SWPPP Date | 6/10/2016 | |
| If applicable, is no exposure certification on file? | ☐ Y | ☐N<br>☒N/A | *Intentionally left blank* | | |

# NPDES Industrial Storm Water Checklist (MSGP)

| **SWPPP Review** | | | |
|---|---|---|---|
| **General** | | | **Notes:** |
| Was the SWPPP completed prior to NOI submission? | ☐ Y | ☒ N | Unknown. Previous SWPPP was not available.<br>NOI Submitted / Current SWPPP certified / Permittee<br>4-26-16 / 6-10-16 / Las Cruces Int. Airport<br>6-14-16 / 6-14-16 / Southwest Aviation<br>6-17-16 / 6-17-16 / Francis Aviation |
| Copy of the NOI and acknowledgment letter from EPA? | ☒ Y | ☐ N | |
| Copy of the permit language? | ☒ Y | ☐ N | |
| Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires? | ☐ Y | ☒ N | |
| Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)?<br>Applicable to:<br>• Routine facility inspection (4.1.3)<br>• Quarterly visual assessment (4.2.3)<br>• Benchmark monitoring (6.2.1.3). | ☐ Y | ☐ N | N/A |
| Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP? | ☒ Y | ☐ N | SWPPP states SPCC to be developed, but it has been developed and SPCC was on shelf with SWPPP. |
| Does the SWPPP include documentation to support eligibility under the Endangered Species Act? | ☐ Y | ☒ N | NOI states no species present, SWPP documentation shows species may be present. |
| Does the SWPPP include documentation to support eligibility under the Historic Preservation Act? | ☒ Y | ☐ N | |
| Does the SWPPP include documentation to support eligibility under NEPA (New Source)? | ☐ Y | ☐ N | N/A |
| Did all “operators” sign/certify the SWPPP? | ☒ Y | ☐ N | All permitted operators. |
| Is the storm water pollution prevention team identified (name or title)? | ☒ Y | ☐ N | Team listed consists of Lisa Murphy, Nick Gogolew, and Hal Kading. |
| Are the storm water pollution prevention team’s responsibilities identified? | ☐ Y | ☒ N | Only describes which parts of the airport they are responsible for. Does not describe who is responsible for maintain and modifying the SWPPP, implementing and maintaining control measures and taking corrective actions. For each activity that an operator (e.g., the airport authority) conducts on behalf of another operator |

| | | | |
|---|---|---|---|
| | | | (e.g., a tenant), the SWPPP must describe a process for reporting results to the latter operator and for ensuring appropriate follow-up, if necessary, by all affected operators. |

# NPDES Industrial Storm Water Checklist (MSGP)

| Site Description | | | Notes: |
|---|---|---|---|
| SWPPP provides a description of the facility's industrial activities? | ☒ Y | ☐ N | |
| Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges? | ☒ Y | ☐ N | |
| Is there a site specific site map? | ☒ Y | ☐ N | |
| Does the site map contain the size of the property in acres? | ☒ Y | ☐ N | Map and plan state the facility is 2,193 acres, Facility description states area of industrial activity exposed to stormwater is approximately 10 acres, those 10 acres were not specified on map. |
| Does the site map contain the location and extent of significant structures and impervious surfaces? | ☒ Y | ☐ N | |
| Does the site map contain directions of storm water flow (indicated by arrows)? | ☒ Y | ☐ N | |
| Does the site map contain locations of all existing structural control measures? | ☒ Y | ☐ N | |
| Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them? | ☒ Y | ☐ N | |
| Does the site map contain locations of all storm water conveyances including ditches, pipes and swales? | ☐ Y | ☒ N | Shows storm drain lines, but not storm drain locations themselves.Drainage paths to south are missing. |
| Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2? | ☐ Y | ☒ N | There is only a rectangle indicating the industrial area. A drum storage area was found in a gravel pit (which may be indicated as detention basin |
| Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred? | ☐ Y | ☒ N | No spills or leaks were identified, however there were signs of ongoing leaks noted during the site visit |
| Does the site map contain locations of all storm water monitoring points? | ☒ Y | ☐ N | |
| Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical? | ☐ Y | ☒ N | |
| Does the site map contain municipal separate storm sewers and where the facility discharges to them? | ☐ Y | ☐ N | N/A |
| Does the site map contain locations and descriptions of all non-storm water discharges? | ☐ Y | ☐ N | N/A |
| | | | |

# NPDES Industrial Storm Water Checklist (MSGP)

| Site Description | | | Notes: |
|---|---|---|---|
| Does the site map contain locations of the following activities where these activities are exposed to precipitation?<br>• Fueling stations<br>• Vehicle and equipment maintenance and/or cleaning areas<br>• Loading/unloading areas<br>• Locations used for the treatment, storage or disposal of wastes<br>• Liquid storage tanks<br>• Processing and storage areas<br>• Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility<br>• Transfer areas for substances in bulk<br>• Machinery | ☐ Y | ☒ N | Only provides general "industrial area" rectangle and fuel farm location. |
| Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants? | ☐ Y | ☐ N | N/A |
| Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released? | ☐ Y | ☐ N | N/A |
| Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)? | ☒ Y | ☐ N | |
| Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity? | ☒ Y | ☐ N | |
| Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP? | ☐ Y | ☒ N | Plan states no significant past spills or leaks have occurred. Spill log was blank. Some leaks and spills seem to have been long term. (Photos1-9). |

# NPDES Industrial Storm Water Checklist (MSGP)

| **Site Description** | | | **Notes:** |
|---|---|---|---|
| Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include:<br>• Date<br>• Description of evaluation criteria<br>• List of the outfalls or onsite drainage points directly observed<br>• Different types of non-storm water discharges and source locations<br>• Actions taken such as a list of control measures for elimination. | ☐ Y | ☒ N | Evaluation was performed Jan 13, 2016 and Feb 22, 2016. States that no unauthorized discharges were noted, did not describe if any authorized non storm water discharges occur at the facility. |
| Does salt storage occur at this facility? | ☐ Y | ☒ N | |
| Does the SWPPP include a summary of storm water sampling data for the previous permit term? | ☐ Y | ☐ N | N/A |

| **Controls to Reduce Pollutants** | | | **Notes:** |
|---|---|---|---|
| Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2? | ☒ Y | ☐ N | |
| Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1? | ☐ Y | ☒ N | |
| Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings? | ☒ Y | ☐ N | |
| Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)? | ☒ Y | ☐ N | |

# NPDES Industrial Storm Water Checklist (MSGP)

| Controls to Reduce Pollutants | | | Notes: |
|---|---|---|---|
| Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums? | ☐ Y | ☒ N | SWPP states it is routine. |
| Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line? | ☒ Y | ☐ N | |
| Does the SWPPP include a schedule for preventative maintenance procedures? | ☐ Y | ☒ N | SWPPP states that routine inspections will determine maintenance needs. Includes the stormwater drainage system and bulk fuel storage area. |
| Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur? | ☒ Y | ☐ N | |
| Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur? | ☐ Y | ☒ N | Drums were not labeled. Drums were open and signs of leakage were present.(Photo1-9). One location implemented proper procedures for drum storage (photo10).<br><br>No documentation or procedures for inspecting stormwater before discharging from tank sumps was available. |
| Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling? | ☐ Y | ☒ N | |
| Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases? | ☐ Y | ☒ N | Signs of long term leaking equipment were visible. Some had been cleaned up, but were still leaking. |
| Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available? | ☒ Y | ☐ N | |
| Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies? | ☒ Y | ☐ N | |

# NPDES Industrial Storm Water Checklist (MSGP)

| Controls to Reduce Pollutants | | | Notes: |
|---|---|---|---|
| Does the SWPPP document erosion and sediment controls? | ☒ Y | ☐ N | |
| Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants? | ☒ Y | ☐ N | |
| Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants? | ☒ Y | ☐ N | |
| If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile? | ☐ Y | ☐ N | N/A |
| Employee Training – is there a schedule for regular (at least annually) employee training? | ☐ Y | ☒ N | Training records available for March 1, 2018 and June 17, 2016. Only SWPPP team members on training roster are Lisa Murphy and Nick Gogalew in 2016. |
| Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit? | ☒ Y | ☐ N | |
| Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged? | ☒ Y | ☐ N | |
| Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials? | ☒ Y | ☐ N | |
| Has the facility eliminated non-storm water discharges not authorized by an NPDES permit? | ☐ Y | ☐ N | N/A |

**Notes on SWPPP Review**

**Sector Specific Observations:**

***8.S.3.1 Permit Coverage/Submittal of NOIs.*** *Where an airport transportation facility has multiple industrial operators that discharge stormwater, each individual operator must obtain coverage under an NPDES stormwater permit. To obtain coverage under the MSGP, all such operators must meet the eligibility requirements in Part 1 and must submit an NOI, per Part 1.2.1.1 (or, if appropriate, a no exposure certification per Part 1.4).*

Each entity conducting business (SIC codes 4512-4581) on airport property must either have permit coverage or a no exposure certification per Part 1.4 of the permit. In addition, to permittees covered under the SWPPP, the SWPPP describes several tenants who may be conducting industrial activities under shelter such as Mesilla Valley Aviation and Southwest Med Evac/Native Air (now Air Methods dba Native Air).

The inspector concluded that the National Guard Counter Drug Unit and NMSU research were not conducting primary business under SIC Codes 4512-4581.

# NPDES Industrial Storm Water Checklist (MSGP)

| **Inspections (Part 4)** | | | |
|---|---|---|---|
| **General** | | | **Notes:** |
| **Routine Facility Inspections** | | | |
| Are routine facility inspections conducted at least quarterly while facility operating? | ☒ Y | ☐ N | Las Cruces International Airport performs the inspections for all tenants. The SWPPP states that each permittee is required to maintain their own inspection and training records, however the airport authority maintains all the records. |
| Are inspections documented, including:<br>• Date and time<br>• Name and signature of inspector<br>• Weather information and a description of discharge occurring at the time of the inspection<br>• Previously unidentified discharges from site<br>• Control measures needing maintenance or repairs<br>• Failed control measures that need replacement<br>• Incidents of noncompliance observed<br>• Additional control measures needed. | ☐ Y | ☒ N | Inspections do not seem to cover areas besides storm drains and bulk fuel storage. |
| Exceptions, including (see 4.1.3):<br>• Inactive and unstaffed sites | ☐ Y | ☐ N | N/A |
| **Quarterly Visual Assessment** | | | |
| Are quarterly visual assessments conducted? | ☐ Y | ☒ N | Only record in SWPP stated no measurable rain for the first quarter. 1” of rain fell in February. |
| Does the assessment consist of a sample collected:<br>• Within the first 30 minutes of discharge<br>• On discharges that occur at least 72 hours (3 days) from the previous discharge<br>• Collected in a clean, clear glass or plastic container. | ☐ Y | ☒ N | No records of visual assessments being conducted. |

# NPDES Industrial Storm Water Checklist (MSGP)

| **Inspections** | | | |
|---|---|---|---|
| Are assessments documented, including:<br>• Sample location<br>• Sample collection date/time & visual assessment date/time<br>• Personnel collecting sample & performing assessment and their signature<br>• Nature of the discharge (runoff or snowmelt)<br>• Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators)<br>• Probable sources of contamination<br>• If applicable, reason for not taking samples within 1st 30 minutes. | ☐ Y | ☒ N | Location listed in SWPPP should be reassessed. It appears that the old storm drain system pipes are listed as the discharge location to be sampled. The non stormwater discharge assessment states that water runs off the site to the south. |
| Exceptions, including (see 4.2.3):<br>• Adverse weather conditions<br>• Climates with irregular storm water runoff<br>• Areas subject to snow<br>• Substantially identical outfalls (per 5.1.5.2)<br>• Inactive and unstaffed sites. | ☐ Y | ☒ N | Only record in SWPP stated no measurable rain for the first quarter. 1" of rain fell in February. |
| **Comprehensive Site Inspections** | | | |
| Are comprehensive site inspections conducted annually (start 9/29/08)? | ☐ Y | ☐ N | N/A |
| Conducted by qualified personnel including at least one member of the storm water pollution prevention team? | ☐ Y | ☐ N | N/A |
| Cover all areas of the facility? | ☐ Y | ☐ N | N/A |
| Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections? | ☐ Y | ☐ N | N/A |

# NPDES Industrial Storm Water Checklist (MSGP)

| **Inspections** | | | |
|---|---|---|---|
| Include observations of the following:<br>• Industrial materials, residue, or trash that may have or could come into contact with storm water<br>• Leaks or spills from industrial equipment, drums, tanks, and other containers<br>• Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site<br>• Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas<br>• Control measures needing replacement, maintenance, or repair<br>• All storm water control measures observed. | ☐ Y | ☐ N | N/A |
| Are inspections documented, including:<br>• Date of inspection<br>• Names and titles of personnel making the inspection<br>• Findings from examination of areas of facility from Part 4.3.1<br>• All observations relating to implementation of control measures<br>• Any required revisions to the SWPPP resulting from inspection<br>• Any incidents of noncompliance identified OR certification that facility is in compliance with the permit<br>• A statement signed in accordance with Appendix B, Subsection 11 | ☐ Y | ☐ N | N/A |

# NPDES Industrial Storm Water Checklist (MSGP)

| **Monitoring (Part 6)** | | | |
|---|---|---|---|
| **General** | | | **Notes:** |
| Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring? | ☐ Y | ☐ N | N/A Facility does not have de-icing operations |
| Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring? | ☐ Y | ☐ N | N/A Facility does not have de-icing operations |
| Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required) | ☐ Y | ☐ N | N/A |
| Are samples analyzed in accordance with 40 CFR Part 136 methods? | ☐ Y | ☐ N | N/A |
| **Benchmark Monitoring** | | | |
| Does the monitoring consist of a sample collected:<br>• Within the first 30 minutes of discharge<br>• On discharges that occur at least 72 hours (3 days) from the previous discharge<br>• Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall<br>• Prior to commingling. | ☐ Y | ☐ N | N/A |
| Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage? | ☐ Y | ☐ N | N/A |
| Is the average of the first four quarterly samples < the parameter benchmark? | ☐ Y | ☐ N | N/A |

# NPDES Industrial Storm Water Checklist (MSGP)

| **Monitoring** | | | |
|---|---|---|---|
| Is the average of the first four quarterly samples > the parameter benchmark?<br>• Make the necessary modifications<br>• Continue quarterly monitoring<br>• Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA<br>• Natural background pollutant level documentation | ☐ Y | ☐ N | N/A |
| Exceptions, including (see 6.1 & 6.2):<br>• Adverse weather conditions<br>• Climates with irregular storm water runoff<br>• Snowmelt<br>• Substantially identical outfalls (per 5.1.5.2)<br>• Inactive and unstaffed sites. | ☐ Y | ☐ N | N/A |
| **Effluent Limitations Monitoring** | | | |
| Sampled once per year? | ☐ Y | ☐ N | N/A |
| Follow-up requirements if discharge exceeds effluent limit (see 6.3)? | ☐ Y | ☐ N | N/A |
| **Other Required Monitoring** | | | |
| • State or Tribal provisions<br>• Discharges to impaired waters<br>• Additional monitoring required by EPA. | ☐ Y | ☐ N | N/A |

| **Reporting (Part 7)** | | | |
|---|---|---|---|
| **General** | | | **Notes:** |
| Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period? | ☐ Y | ☐ N | N/A |
| Is the annual report submitted by 45 days after conducting the comprehensive site inspection? | ☒ Y | ☐ N | Annual reports submitted January 26, 2018 and January 25, 2017 |
| If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received? | ☐ Y | ☐ N | N/A |

# NPDES Industrial Storm Water Checklist (MSGP)

| **SWPPP Implementation** | |
|---|---|
| **Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff** | *(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system*)<br><br>Some leaks and spills seem to have been long term and control measures are not always implemented. (Photos1-9). |
| **Good Housekeeping** | *(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)*<br><br>Waste bins were not covered and trash could be removed by crows or wind (photo12).<br>Drums are not stored within containment (photos 1-9) |
| **Preventative maintenance** | *(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)*<br><br>Some leaks and spills seem to have been long term. (Photos1-9). |

# NPDES Industrial Storm Water Checklist (MSGP)

| SWPPP Implementation | |
|---|---|
| **Spill Prevention and Response** | *(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)*<br><br>Several items of equipment and drums were leaking, photos 1-9. Staff stated they were trying to determine owners of the leaking plane.<br><br>The aboveground storage tanks had adequate secondary containment and a spill kit was available. Two drums within the fence were labeled and on secondary containment (photo 10). However, other another drum had signs of seepage and was not on containment. |
| **Erosion and Sediment Controls** | *(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)*<br><br>Majority of facility is paved with storm drains leading to a vegetated retention pond (photo 13). |
| **Management of Runoff** | *(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)*<br><br>Majority of facility is paved with storm drains leading to a vegetated retention pond on the southeast. No outlet pipe was visible(photo 13). |
| **Salt Storage Piles** | *(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)*<br><br>n/a |

# NPDES Industrial Storm Water Checklist (MSGP)

| **SWPPP Implementation** | |
|---|---|
| **Waste, Garbage and Floatable Debris**<br><br>Part 2.1.2.2 | *(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)*<br><br>Dumpsters were not covered and contained materials that could be windblown. (photo 12), tumbleweeds were located in drainage channels and blocking storm drains. |
| **Evidence of non-storm water discharges** | No non-stormwater discharges were observed leaving the facility at the time of the inspection, however, some equipment near the NMSU building was leaking what appeared to be water at time of inspection (photo 11). |
| **Dust Generation and Vehicle Tracking of Industrial Materials** | *(minimize generation of dust and off-site tracking of raw, final, or waste materials)*<br><br>Majority of facility is paved, no tracking was noted at the time of inspection. |

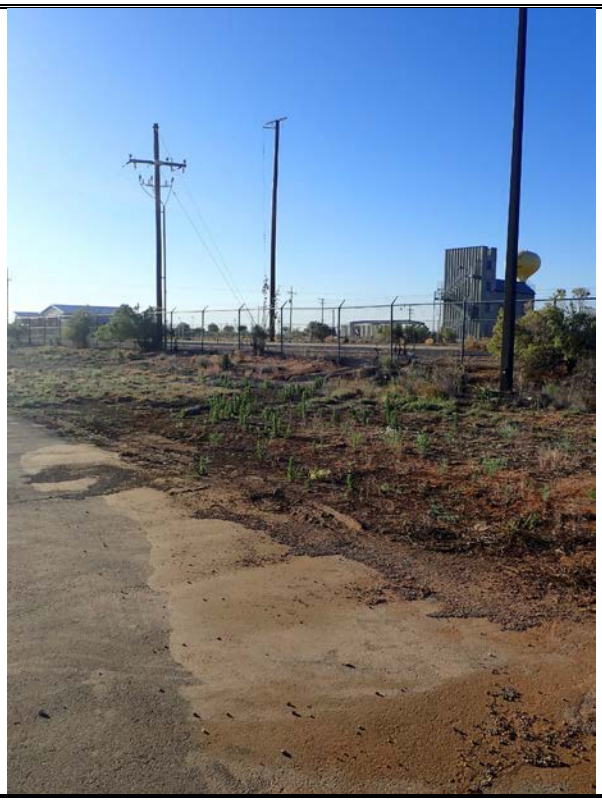
| NMED/SWQB<br>Official Photograph Log<br>Photo # 1 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 7:27 am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: Leaks and drum storage at Southwest Aviation | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 2 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 7:20 am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: Leaks under fueling trucks | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 3 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 7:37 am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: used oil drum and staining on ground | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 4 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 7:35 am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: long term leak under plane with overflowing drip pan (unknown owner) | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 5 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 7:34 am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: oil staining from plane near storm drain | | |



| NMED/SWQB<br>Official Photograph Log<br>Photo # 6 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 7:33am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: oil stain and rags on ground near airplane | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 8 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 7:41am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: drum storage area | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 9 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 7:41am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: open containers and stains on the ground | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 10 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 8:56am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: drum storage on secondary within tank farm | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 11 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 8 am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: water leaking from outdoor equipment | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 12 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 7:48am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: uncovered dumpsters | | |

| NMED/SWQB<br>Official Photograph Log<br>Photo # 13 | | |
|---|---|---|
| Photographer: Jennifer Foote | Date: 5/3/18 | Time: 9:05am |
| City/County: Las Cruces/Dona Ana | | State: New Mexico |
| Location: Las Cruces International Airport | | |
| Subject: drainage pond with no outlet | | |