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NEW MEXICO ENVIRONMENT DEPARTMENT

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BUTCH TONGATE
Cabinet Secretary
J.C. BORREGO
Acting Deputy Secretary

Certified Mail - Return Receipt Requested

September 20, 2016

Mr. Lloyd Martinez, Utilities Director
City of Socorro
111 School of Mines Road
Socorro, NM 87801

**Re: City of Socorro; Multi-Sector General Permit (MSGP); Compliance Evaluation
Inspection (CEI); SIC 4952; NPDES Permit NMR053047; September 7, 2016**

Dear Mr. Martinez:

Enclosed please find a copy of the 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.

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:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

Sarah Holcomb
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 Sandra Gabaldon at (505) 827-1041 or at sandra.gabaldon@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

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

cc: David Long, USEPA (6EN-WM) by email
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson (6EN-WC) by e-mail
Robert Houston, (6EN-WS) by e-mail
NMED District I by email



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 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="R"/> 0 5 3 0 4 7 11 12 1 <input type="text" value="6"/> 0 9 0 7 17 18 <input type="text" value="C"/> 19 <input type="text" value="S"/> 20 <input type="text" value="2"/>					
<input type="text" value="S"/> <input type="text" value="E"/> <input type="text" value="C"/> <input type="text" value="T"/> <input type="text" value="O"/> <input type="text" value="R"/> <input type="text" value="T"/> <input type="text" value="T"/> <input type="text" value="R"/> <input type="text" value="E"/> <input type="text" value="A"/> <input type="text" value="T"/> <input type="text" value="M"/> <input type="text" value="E"/> <input type="text" value="N"/> <input type="text" value="T"/> <input type="text" value="W"/> <input type="text" value="O"/> <input type="text" value="R"/> <input type="text" value="K"/> <input type="text" value="S"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text" value="1"/> 69	70 <input type="text" value="3"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/>	74 75 <input type="text" value=""/>

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) SOCORRO WWTP I-25 South, exit to Socorro. Left on Manzanares Street. Then left on Main Street. VALENCIA COUNTY	Entry Time /Date 1350 Hours / 09-07-2016	Permit Effective Date June 4, 2015
	Exit Time/Date 1540 Hours / 09-07-2016	Permit Expiration Date June 4, 2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Lloyd Martinez, Utilities Director / 575 838 1606 Pauline Taylor, Operator	Other Facility Data SIC: 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Lloyd Martinez, Utilities Director 111 School of Mines Road Socorro, NM 87801	Contacted Yes <input type="checkbox"/> * No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="text" value="S"/>	Permit	<input type="text" value="N"/>	Flow Measurement	<input type="text" value="N"/>	Operations & Maintenance	<input type="text" value="N"/>	CSO/SSO
<input type="text" value="M"/>	Records/Reports	<input type="text" value="N"/>	Self-Monitoring Program	<input type="text" value="N"/>	Sludge Handling/Disposal	<input type="text" value="N"/>	Pollution Prevention
<input type="text" value="S"/>	Facility Site Review	<input type="text" value="N"/>	Compliance Schedules	<input type="text" value="N"/>	Pretreatment	<input type="text" value="N"/>	Multimedia
<input type="text" value="N"/>	Effluent/Receiving Waters	<input type="text" value="N"/>	Laboratory	<input type="text" value="M"/>	Storm Water	<input type="text" value=""/>	Other:

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

See checklist

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldon /s/ Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/(505) 827-0160	Date September 20, 2016
Signature of Management QA Reviewer /s/ Jennifer Foote Jennifer Foote, Municipal Team Lead	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-0596/(505) 827-0160	Date September 20, 2016

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information			General		
Inspection Type	Multi-Sector General Permit		Inspector Name	Sandra Gabaldon	
NPDES ID Number	NMR053047		Telephone	(505) 827-1041	
Inspection Date	September 7, 2016		Entry Time	1320 Hours / September 9, 2016	
Inspector Type <i>(circle one)</i>	EPA	State	EPA Oversight	Exit Time	1502 Hours / September 09, 2016
Facility Sector/ SIC/Activity Code	SIC TW, T1		Signature		

Facility Location Information				
Name/Location/ Mailing Address	City of Socorro WWTP 111 School of Mines Socorro, NM 87801			
GPS Coordinates	Latitude	34°3'37.85" N	Longitude	-106°53'4.00" W
Receiving Water(s)	Luis Lopez Drain, thence to the Rio Grande			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Lloyd Martinez, Utilities Director	575-838-1606
Facility Contact	Lloyd Martinez, SWPPP Team Coordinator Pauline Taylor, Operator	See Above
Authorized Official(s)	Llyod Ortiz, Utilities Director	See Above

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	N
Permit Type	General	Individual	SWPPP Contents Satisfactory	Y	N
Operational Date	Unknown		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	N
NOI/Application Date	08/26/2015		SWPPP Date	08/20/2015	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	SWPPP Completed: August 8, 2015; NOI Completed: 08/26/2015. However, SWPPP was never signed.
Copy of the NOI and acknowledgment letter from EPA?	Y	<input checked="" type="checkbox"/>	Copy of NOI provided; No acknowledgement letter in the SWPPP.
Copy of the permit language?	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	The operator provided reports, but reports were not with the SWPPP.
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)? Applicable to: · Routine facility inspection (4.1.3) · Quarterly visual assessment (4.2.3) · 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	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description		Notes:	
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/>	N	Treatment Works treating domestic sewage.
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	<input checked="" type="checkbox"/>	General map provided appears to be a map generated by Google Earth, but does not identify receiving waters for stormwater discharges.
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/>	In the site description, the area is stated to be 2.54 gross acres. This is not on the site map as required.
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/>	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/>	N	Map provided has a flow direction, which is not correct (rain event during inspection suggested other flow directions).
Does the site map contain locations of all existing structural control measures?	Y	<input checked="" type="checkbox"/>	
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	<input checked="" type="checkbox"/>	The WWTP, if discharges, into segment NMAC 20.6.4.105.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/>	The WWTP would discharge into the Luis Lopez Drain, thence to the Rio Grande in NMAC segment 20.6.4.105. There is no indication of this on the site map.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	N/A - No spills in last 4 years (according to SWPPP)
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/>	
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	<input checked="" type="checkbox"/>	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	N/A - No SMS4
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/>	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> · Fueling stations N/A · Vehicle and equipment maintenance and/or cleaning areas N · Loading/unloading areas N · Locations used for the treatment, storage or disposal of wastes N · Liquid storage tanks N · Processing and storage areas N/A · 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 N · Transfer areas for substances in bulk N · Machinery N 	Y	<input type="checkbox"/> N	
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	<input type="checkbox"/> N	
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	<input type="checkbox"/> N	SWPPP states industrial activities include: Vehicle cleaning, Vehicle Parking, Lime Storage area, Trash Dumpster. The SWPPP does not identify sludge removal practices nor sewage acceptance area.
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)?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	N	SWPPP includes a list of pollutants associated with activities, but does not discuss sludge from the belt press or septage from septage acceptance area.
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> · Date: March 7, 2016 · Description of evaluation criteria: Visual Observation · List of the outfalls or onsite drainage points directly observed: 001, 002, 003 · Different types of non-storm water discharges and source locations · Actions taken such as a list of control measures for elimination.: None 	<input checked="" type="checkbox"/>	N	
Does salt storage occur at this facility?	Y	N	N/A
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	No stormwater sampling required – Sector T
<u>Controls to Reduce Pollutants</u>		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	<input checked="" type="checkbox"/>	The SWPPP does not address selection, design, installation and implementation of control measures in accordance with good engineering practices.
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	<input checked="" type="checkbox"/>	
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?	<input checked="" type="checkbox"/>	N	Section 7.0 of the SWPPP states the following practices are to be used immediately: (1) Ensure that all wash water drains to a proper collection system; (2) Drain fluids from equipment/vehicles prior to on-site storage or disposal; (3) Use spill/overflow protection equipment; (4) Use drip pans/absorbents under or around leaky vehicles and equipment or store indoors where feasible; (5) Clean up spills promptly; (6) Use grading, berming, or curbing to prevent runoff or contaminated flows and divert run-on away from these areas.
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	<input checked="" type="checkbox"/>	Section 7.02 of the SWPPP states the following: (1) Trash dumpster area: Clean and Sweep area monthly; (2) Parking area: inspect monthly, clean and sweep as needed; (3) Dump Truck Area: Swept Monthly; (4) Lime Area: Area will be trapped continuously. If lime spill occurs, it will be immediately cleaned and disposed of in aerobic digesters. No discussion of labeling and storing materials in appropriate containers.

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?	<input checked="" type="checkbox"/> Y	N	Team Coordinator (Lloyd Martinez) will dispose of waste weekly with quarterly inspections for leaks and conditions of drums, tanks or containers.
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?	<input checked="" type="checkbox"/> Y	N	Regular inspections, testing, maintenance and repair of all industrial equipment and systems, and control measures, to avoid situations that may result in leaks, spills, and other releases, and any back up practices in place should runoff event occur while control measure is offline
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input checked="" type="checkbox"/> N	
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	<input checked="" type="checkbox"/> 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	<input checked="" type="checkbox"/> N	
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?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	Y	<input checked="" type="checkbox"/> N	
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	<input checked="" type="checkbox"/> N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	<input checked="" type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	Y	<input type="checkbox"/> N	The SWPPP discusses Buffers or equivalent sediment controls. These are not part of the MSGP. However, these things are discussed in the Construction General Permit.
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	<input type="checkbox"/> 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	<input type="checkbox"/> 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	<input type="checkbox"/> N	SWPPP does not document employee training.
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	<input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Y	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	<input type="checkbox"/> N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

The Socorro WWTP is located in an urbanized area in Valencia County. The WWTP is paved as to prevent sediment loss. The perimeter of the WWTP is fenced with chain link and there is curbing along the north, east, west and part of the south side of the plant. The area where trucks are moving sludge from the belt press is not curbed as to allow access. There is a slight upgrade from the road in this area, causing a possible discharge point. This is also true where septage trucks are allowed to pump their waste into the plant. This again, may be another discharge point.

The site is well maintained, and clean. There is no indication that a discharge has occurred recently.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	<input checked="" type="checkbox"/>	N	
Are inspections documented, including: <ul style="list-style-type: none"> · Date and time: YES · Name and signature of inspector YES · Weather information and a description of discharge occurring at the time of the inspection: YES · Previously unidentified discharges from site: NO · Control measures needing maintenance or repairs: NO · Failed control measures that need replacement: NO · Incidents of noncompliance observed: NO · Additional control measures needed: NO 	Y	<input checked="" type="checkbox"/>	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> · Inactive and unstaffed sites 	Y	N	N/A
Quarterly Visual Assessment			Quarterly visual assessments are done; However, information is not being filled out correctly on the assessment form.
Are quarterly visual assessments conducted?	<input checked="" type="checkbox"/>	N	Inspection Dates: January, April, and July 2016
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> · Within the first 30 minutes of discharge · On discharges that occur at least 72 hours (3 days) from the previous discharge · Collected in a clean, clear glass or plastic container. 	Y	<input checked="" type="checkbox"/>	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: <ul style="list-style-type: none"> · Sample location · Sample collection date/time & visual assessment date/time · Personnel collecting sample & performing assessment and their signature · Nature of the discharge (runoff or snowmelt) · Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) · Probable sources of contamination · If applicable, reason for not taking samples within 1st 30 minutes. 	Y	<input checked="" type="checkbox"/>	
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> · Adverse weather conditions · Climates with irregular storm water runoff · Areas subject to snow · Substantially identical outfalls (per 5.1.5.2) · Inactive and unstaffed sites. 	Y	<input checked="" type="checkbox"/>	There is no indication on the assessment form that any of the exceptions from Part 4.2.3. of the permit are observed. There is no indication with the SWPPP at outfalls listed are "substantially identical".
Comprehensive Site Inspections			No Comprehensive inspection was done.
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input checked="" type="checkbox"/>	
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	<input checked="" type="checkbox"/>	
Cover all areas of the facility?	Y	<input checked="" type="checkbox"/>	
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, No monitoring required for Sector T - TW

NPDES Industrial Storm Water Checklist (MSGP)

Inspections		
<p>Include observations of the following:</p> <ul style="list-style-type: none"> · Industrial materials, residue, or trash that may have or could come into contact with storm water · Leaks or spills from industrial equipment, drums, tanks, and other containers · Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site · Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas · Control measures needing replacement, maintenance, or repair · All storm water control measures observed. 	Y	<input type="checkbox"/> N
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> · Date of inspection · Names and titles of personnel making the inspection · Findings from examination of areas of facility from Part 4.3.1 · All observations relating to implementation of control measures · Any required revisions to the SWPPP resulting from inspection · Any incidents of noncompliance identified OR certification that facility is in compliance with the permit · A statement signed in accordance with Appendix B, Subsection 11 	Y	<input type="checkbox"/> N

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
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	N/A
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	
Benchmark Monitoring			N/A
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> · Within the first 30 minutes of discharge · On discharges that occur at least 72 hours (3 days) from the previous discharge · Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall · Prior to commingling. 	Y	N	
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? • Make the necessary modifications • Continue quarterly monitoring • Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA • Natural background pollutant level documentation	Y	N	
Exceptions, including (see 6.1 & 6.2): • Adverse weather conditions • Climates with irregular storm water runoff • Snowmelt • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites.	Y	N	
Effluent Limitations Monitoring			N/A
Sampled once per year?	Y	N	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
Other Required Monitoring			
• State or Tribal provisions • Discharges to impaired waters • Additional monitoring required by EPA.	Y	N	
Reporting (Part 7)			
<u>General</u>			Notes:
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	
Is the annual report submitted January 30th after conducting the comprehensive site inspection?	Y	N	
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	

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<p>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</p>	<p><i>(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)</i></p> <p>The permit holder needs to consider loading and unloading areas, as these areas were not addressed in the SWPPP.</p>
<p>Good Housekeeping</p>	<p><i>(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)</i></p> <p>Drums are labeled and kept in an orderly fashion.</p>
<p>Preventative maintenance</p>	<p><i>(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)</i></p> <p>Regular inspections being performed</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(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)</i></p> <p>Spill kits available onsite.</p>
Erosion and Sediment Controls	<p><i>(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)</i></p> <p>Flow velocity dissipation is seen on the retention pond</p>
Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Infiltration is being used within the retention pond</p>
Salt Storage Piles	<p><i>(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)</i></p> <p>N/A</p>

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SWPPP Implementation	
Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>Disposal of waste is scheduled for weekly pickup. Trash bins are covered and remain so until disposal occurs.</p>
Evidence of non-storm water discharges	No
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Area is paved. No tracking is seen. Sweeping is done if sludge being removed is spilled.</p>

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Implementation and Sector Specific Requirements

List and describe structural controls *(The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications)*

Curbing

Retention pond with rip rap

Grass area

Berming