



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



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Certified Mail - Return Receipt Requested

October 4, 2016

Mr. Shannon Jones, Waste Management Division Director
City of Santa Fe – Paseo Real Wastewater Treatment Plant
73 Paseo Real
Santa Fe, NM 87507

Re: City of Santa Fe – Paseo Real Wastewater Treatment Plan; Multi-Sector General Permit (MSGP); Compliance Evaluation Inspection (CEI); SIC 4952; NPDES Permit NMR053077; September 14, 2016

Dear Mr. Jones:

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.

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:

David Long
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/ Shelly Lemon for

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
Gladys Gooden-Jackson (6EN-WC) by e-mail
Robert Houston, (6EN-WS) by e-mail
NMED District II 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 N 2 5 3 N M R 0 5 3 0 7 7 11 12 1 6 0 9 1 4 17 18 ~ 19 S 20 2					
S E C T O R T T R E A T M E N T W O R K S					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 4	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) Santa Fe WWTP- 599 South to Airport Road, Turn Right onto Paseo Rael to WWTP. SANTA FE COUNTY	Entry Time /Date 0830 Hours / 09-14-2016	Permit Effective Date June 4, 2015
	Exit Time/Date 1020 Hours / 09-14-2016	Permit Expiration Date June 4, 2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Shannon Jones, Director Luis Orozco, Plant Supervisor Kenneth Espinoza, Assistant Plant Supervisor Kathleen Garcia, PE	Other Facility Data SIC: 4952 35.631225° N -106.88578° W	
Name, Address of Responsible Official/Title/Phone and Fax Number Shannon Jones, Public Utilities Director	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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
S	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	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)

Please see checklist and further explanations for details of findings

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 October 4, 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 October 4, 2016

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information			General		
Inspection Type	MSGP - Industrial		Inspector Name	Gabaldón, Sandra	
NPDES ID Number	NMR053077		Telephone	(505) 827-1041	
Inspection Date	September 14, 2016		Entry Time	0830 Hours / 09-14-2016	
Inspector Type <i>(circle one)</i>	EPA	State	EPA Oversight	Exit Time	1020 Hours / 09-14-2016
Facility Sector/ SIC/Activity Code	TW / T1 SIC: 4952		Signature		

Facility Location Information				
Name/Location/ Mailing Address	City of Santa Fe - Paseo Real Wastewater Treatment Plant 73 Paseo Rael Santa Fe, NM 87507			
GPS Coordinates	Latitude	35.631225° N	Longitude	-106.088578° W
Receiving Water(s)	Santa Fe River, thence the Rio Grande in NMAC 20.6.4.113, Rio Grande Basin; (City of Santa Fe SMS4, not yet issued)			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Shannon Jones, Director swjones@santafenmn.gov	(505) 955-4650
Facility Contact	Shannon Jones, Director Kathleen Garcia, PE Luis Orozco, Plant Supervisor Kenneth Espinoza, Assistant Plant Supervisor	(505) 955-4650 (505) 955-4615 (505) 955-4616
Authorized Official(s)		

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	<input checked="" type="checkbox"/> Y	N
Operational Date	1984		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	N
NOI/Application Date	09/27/15		SWPPP Date	08/26/2015	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	SWPPP completed 08/26/2015; NOI submitted 09/27/15
Copy of the NOI and acknowledgment letter from EPA?	Y	<input checked="" type="checkbox"/>	Copy of acknowledgement letter not found in the SWPPP.
Copy of the permit language?	<input checked="" type="checkbox"/>	N	Attachment C – Hard Copy located under Tab #3 of Binder 1. Also provides EPA website for the MSGP.
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input checked="" type="checkbox"/>	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)? Applicable to: <ul style="list-style-type: none"> · Routine facility inspection (3.1.1) · Quarterly visual assessment (3.2.3) · 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?	<input checked="" type="checkbox"/>	N	Spill Prevention & Response Guidance is in the SWPPP, Attachment D.
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input checked="" type="checkbox"/>	N	IPaC Trust Resource Report (07/30/2015). SWPPP states three species identified (Mexican Spotted Owl, Southwestern Willow Flycatcher, Yellow-Billed Cuckoo) do not exist within the action area.
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?	<input checked="" type="checkbox"/>	N	SWPPP Certification signed by Shannon Jones, Wastewater Management Division Director.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	SWPP Team is identified by title with individual responsibilities stated.
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
SWPPP provides a description of the facility's industrial activities?	Y	<input checked="" type="checkbox"/> N	Treatment works, with primary, secondary and tertiary treatment along with sludge handling facilities. Description is not available for the composting area.
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?	<input checked="" type="checkbox"/> Y	N	Attachment A of the SWPPP
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	N	Attachment B of the SWPPP. Hard copy can be found in the back sleeve of Binder #1.
Does the site map contain the size of the property in acres?	<input checked="" type="checkbox"/> Y	N	147.7 total acres
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/> 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 <u>impaired</u> , and if so, whether the waters have TMDLs established for them?	Y	<input checked="" type="checkbox"/> N	The site map does not indicate that the receiving waters are listed on the NM 303(d) list. Impairment for nutrients. TMDL for this segment of the Santa Fe River has not yet been approved by EPA.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.2.2?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.2.3.3 have occurred?	Y	N	No spills or leaks reported in last 3 years
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/> 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?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	sMS4 permit has not yet been issued, but is in the public comment phase.
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/> N	

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 · Vehicle and equipment maintenance and/or cleaning areas: YES · Loading/unloading areas: NO · Locations used for the treatment, storage or disposal of wastes: YES · Liquid storage tanks: YES · Processing and storage areas: YES · 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: YES · Transfer areas for substances in bulk: NO · Machinery: NO 	Y	<input checked="" type="checkbox"/>	<p>Site Map does not provide location where machinery is stored (i.e., composting area)</p> <p>Site Map does not provide location where loading of composting is occurring.</p> <p>Site Map does not indicate transfer areas for composting area.</p> <p>Modification to the SWPPP can be made to correct these deficiencies.</p>
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	There is no indication that significant quantities of pollutants are running on to the site.
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?	<input checked="" type="checkbox"/>	N	Pollutants include: High pH, inorganic chemicals, pathogens, nitrates, metals, TDS, TSS, oil, fuel, hydraulic fluids, ammonia, diesel fuels, solvents, automotive wastes, gasoline oils, ferric chloride.
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"/>	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/>	N	
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"/>	N	No significant spills or leaks in the past 3 years. The SWPPP does have location and discharge points of potential spills/leaks could occur.

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: August 17, 2015 · Description of evaluation criteria · List of the outfalls or onsite drainage points directly observed · Different types of non-storm water discharges and source locations · Actions taken such as a list of control measures for elimination. 	<input checked="" type="checkbox"/>	N	Visual Inspection was performed. Drainage points observed were Outfalls #1, #2, #3, #4, #5, and #6. No actions were taken such as a list of control measures for elimination.
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	<input checked="" type="checkbox"/>	No stormwater sampling data is currently available for this site. There are no records of past stormwater sampling.
<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?	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	No discussion was seen in the SWPPP regarding selection and design of control measures as required by Part 2.1.1 of the permit.
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	
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)?	<input checked="" type="checkbox"/>	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	<input type="checkbox"/> N	SWPPP states Ferric Chloride tank is "inspected on a regular basis". It does not provide a specific schedule for inspection. There are no specific dates/schedules for disposal of wastes.
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	<input type="checkbox"/> N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input 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?	<input checked="" type="checkbox"/> Y	N	Containers will be "labeled". Spill prevention and response guidelines are attached to this document as Attachment D .
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?	<input checked="" type="checkbox"/> Y	N	See above -
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?	<input checked="" type="checkbox"/> Y	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 type="checkbox"/> N	SWPPP, attachment D, Spill Prevention & Response has information regarding: Major spills, Minor Spills, Chemical Spill Kits, PPE, Clean Up Material, and Emergency telephone numbers, but does not document any training of employees who may cause, detect, or respond to spills or leaks.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants		Notes:	
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/>	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?	<input checked="" 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?	<input checked="" type="checkbox"/>	N	Bar ditch borders the entire southern border of the facility.
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?	<input checked="" type="checkbox"/>	N	Employee training occurs annually.
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 checked="" type="checkbox"/>	The stormwater training document provided lists “Proper use of Pesticides, Herbicides and Fertilizers”. There is no indication that training covers specific control measures, inspection, planning, reporting or documentation required by the permit.
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"/>	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/>	N	All entrances have asphalt covered roads along with cattle guards to remove tracking of raw, final or waste materials from leaving the site.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

The City of Santa Fe Paseo Real Wastewater Treatment Plant (WWTP) has a design flow capacity of 13 MGD (million gallons per day). The City's WWTP produces and discharges reclaimed water and sewage sludge in compliance with U.S. Environmental Protection Agency (USEPA) National Pollutant Discharge Elimination System (NPDES) Permit NM0022292 and New Mexico Environment Department's (NMED) Permit DP 289 and DP 135. The City of Santa Fe WWTP practices a conventional treatment process and has an approved pretreatment program. The WWTP is composed of several units all of which work together to treat municipal sewage to produce and effluent which meets and exceeds all federal and state discharge requirements. The processes that take place at the facility include primary treatment (headworks, grit removal, primary clarifiers), secondary treatment (aeration basins, secondary clarifiers), tertiary treatment (filtration, ultraviolet disinfection and post aeration).

Sludge handling facilities are also on site. These included dissolved air floatation, anaerobic sludge digestion, lime stabilization, sludge storage tanks, sludge drying beds, sludge dewatering and composting. Sludge surface injection takes place in an adjacent field which is permitted under NMED Discharge Permit 135. The WWTP also has a potable/non-potable discharge site and a septage receiving site.

Santa Fe Biosolids Compost is a co-located Sector at this site (Sector C) that needs to be addressed in the SWPPP and in the electronic Notice of Intent (eNOI). The compost is processed using the sludge from the WWTP and is sold for profit.

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Inspections (Part 4)		
<u>General</u>	Notes:	
Routine Facility Inspections		SWPPP states quarterly inspections will be performed by the Plant superintendent/Assistant Plant Superintendent.
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: No · Weather information and a description of discharge occurring at the time of the inspection: Yes · Previously unidentified discharges from site: Yes · Control measures needing maintenance or repairs: Yes · Failed control measures that need replacement: Yes · Incidents of noncompliance observed: Yes · Additional control measures needed: Yes 	Y	<input checked="" type="checkbox"/>
Exceptions, including (see 3.1.1): <ul style="list-style-type: none"> · Inactive and unstaffed sites 	Y	N
Quarterly Visual Assessment		Visual assessments will be conducted at Outfall #4 when discharges occur. Outfall 1, 2, 3, 5 and 6 are listed as "substantially identical". However, Outfall #6, is at the composting site, unrelated to WWTP. The pollutants from this area are most likely Nitrogen and Phosphorus.
Are quarterly visual assessments conducted?	<input checked="" type="checkbox"/>	N
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. 	<input checked="" type="checkbox"/>	N
		Discharge began at 8:00 AM (normal working hours); Sample taken at 8:05 AM

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Inspections		
Are assessments documented, including: <ul style="list-style-type: none"> · Sample location: YES · Sample collection date/time & visual assessment date/time: YES · Personnel collecting sample & performing assessment and their signature: YES · Nature of the discharge (runoff or snowmelt): YES (rainfall) · Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators): YES · Probable sources of contamination: N/A · If applicable, reason for not taking samples within 1st 30 minutes: N/A 	<input checked="" type="checkbox"/>	N
Exceptions, including (see 3.2.3): <ul style="list-style-type: none"> · Adverse weather conditions · Climates with irregular storm water runoff · Areas subject to snow · Substantially identical outfalls (per 5.2.5.3) · Inactive and unstaffed sites. 	Y	N
		N/A

Monitoring (Part 6)		
General	Notes:	
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input checked="" type="checkbox"/>	N
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input checked="" type="checkbox"/>	N
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input checked="" type="checkbox"/>	N
Benchmark Monitoring		
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 	Y	<input checked="" type="checkbox"/>
		N/A - Sector T. No Benchmark monitoring is required. Co-located Sector C – Benchmark monitoring required for: Nitrate plus Nitrite Nitrogen. SF WWTP is monitoring for Total Nitrogen and Total Phosphorus, annually.
		Impaired water (sample annually beginning date of discharge authorization ~ 10/27/15)
		SF WWTP did not know they were under Sector C (co-located sector) as well. Benchmark Monitoring was not discussed in the SWPPP for Sector C, although the facility is monitoring for Total Nitrogen and Total Phosphorus because of the impairment of

NPDES Industrial Storm Water Checklist (MSGP)

<p>hours (3 days) from the previous discharge</p> <ul style="list-style-type: none"> Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall Prior to commingling. 			the Santa Fe River.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	<input checked="" type="checkbox"/> N	See above for details
Is the average of the first four quarterly samples < the parameter benchmark?	Y	<input checked="" type="checkbox"/> N	Sector C bench monitoring has not been completed quarterly.
<p>Is the average of the first four quarterly samples > the parameter benchmark?</p> <ul style="list-style-type: none"> 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	<input checked="" type="checkbox"/> N	
<p>Exceptions, including (see 6.1.5, 6.1.6 & 6.2.1.3):</p> <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Snowmelt Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	Y	N	N/A
Effluent Limitations Monitoring (Sector A, C, D, E, J, K, L, O, S)			
Sampled once per year?	<input checked="" type="checkbox"/> Y	N	Permittee was unaware of Sector C requirements. However, because facility discharges to "impaired" waters, they are required to sample annually for Total Nitrogen, Total Phosphorus.
Follow-up requirements if discharge exceeds effluent limit (see 6.2.2.3)?	Y	N	N/A
Water Quality Based Effluent Limitations			
Does the facility discharge to water quality impaired waters?	<input checked="" type="checkbox"/> Y	N	303(d) lists: Segment 20.6.4.113, Total Nitrogen, Total Phosphorus.
If TMDL exists, does the facility need to monitor?	Y	N	TMDL has not yet been approved by EPA.
Is the facility monitoring all 303(d) pollutants in the first surface water to which they discharge?	<input checked="" type="checkbox"/> Y	N	
Does the facility discharge to a CERCLA site?	Y	<input checked="" type="checkbox"/> N	
Additional monitoring required by EPA?	Y	<input checked="" type="checkbox"/> N	

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Reporting (Part 7) Information must be submitted using NeT for NOI, NEC, NOT and Annual Report.			<u>DMRs must be submitted using NetDMR</u>
<u>General</u>			Notes:
Is facility a new discharger or new source to water quality impaired waters? Has the facility submitted this information to EPA Region 6?	Y	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
If there was a facility exceedance under numeric effluent limitations, was a report submitted to EPA within 30 days?	Y	N	N/A
Did the facility submit benchmark or ELG monitoring through NetDMR?	Y	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Facility did annual monitoring, rather than quarterly
Did the facility submit Annual Reports to EPA through NeT? (Due January 30 of each year)	Y	N	Annual Report due January 30, 2017. Facility submitted eNOI September 2015.
If follow up monitoring per 6.2.2.3 exceeds a numeric limit, did the facility submit an Exceedance Report (paper) to EPA Region 6 in addition to reporting the monitoring data through NetDMR?	Y	N	N/A

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>Areas are kept clean. Spill kits are available, as needed. Maintenance of vehicles is done in the maintenance shop.</p> <p>Secondary containment is used for any drums/cylinders that are kept outdoors.</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>Facility is orderly and all drums/containers are labeled. Sweeping is completed as needed.</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>Inspections are done on a routine basis. Control measures are maintained.</p>

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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 prevention and response plan in SWPPP, Attachment D. Details procedures for major and minor spills.</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>Outfall channels appeared to be lined with rip rap and vegetation. Bar ditch borders southern side of site.</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>Runoff is diverted to the 6 outfalls listed. Infiltration is seen with vegetative buffers along with detention ponds.</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>Receptacles are kept closed. The site is orderly and clean.</p>
Evidence of non-storm water discharges	None.
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>Non-potable water is used for dust control. Vehicle tracking is swept if needed. Cattle guards keep off site tracking to a minimum.</p>

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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)*

Berms are seen throughout the site.

Detention Ponds

Cattle Guards are located at entrances

Vegetative areas are seen throughout the area.

Riprap and vegetation is seen at outfalls.