



NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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BUTCH TONGATE
Deputy Secretary

ERIKA SCHWENDER
Director
Resource Protection Division

December 6, 2013

Mr. Lawrence Meers, Owner
Mesa Oil, Inc.
6395 East 80th Avenue
Commerce City, CO 80022

**Re: Mesa Oil, Inc., MSGP; SIC 5093; NPDES Compliance Evaluation Inspection; NMR05B151;
November 6, 2013**

Dear Mr. Meers:

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.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the 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. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
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 Sarah Holcomb at 505-827-2798 or at sarah.holcomb@state.nm.us.

Sincerely,
/s/ Bruce J. Yurdin
Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail

Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Hannah Branning, USEPA (6EN-WC) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
NMED District 1, William Chavez by e-mail
Jerry Schoepner, Chief, NMED GWQB, by e-mail
John Kieling, Chief, NMED HWB, by e-mail
Jennifer Hower, NMED OGC, by e-mail



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"/> 4 <input type="text" value="0"/> 5 <input type="text" value="5"/> 6 <input type="text" value="B"/> 7 <input type="text" value="1"/> 8 <input type="text" value="5"/> 9 <input type="text" value="1"/> 10	11 <input type="text" value="1"/> 12 <input type="text" value="3"/> 13 <input type="text" value="1"/> 14 <input type="text" value="1"/> 15 <input type="text" value="0"/> 16 <input type="text" value="4"/> 17	18 <input type="text" value="~"/>	19 <input type="text" value="S"/> 20 <input type="text" value="2"/>		
Remarks					
<input type="text" value="O"/> <input type="text" value="I"/> <input type="text" value="L"/> <input type="text" value="R"/> <input type="text" value="E"/> <input type="text" value="C"/> <input type="text" value="Y"/> <input type="text" value="C"/> <input type="text" value="L"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="G"/>					
Inspection Work Days		Facility Evaluation Rating		BI	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69		70 <input type="text" value="2"/>		71 <input type="text" value="N"/> 72 <input type="text" value="N"/> 73 <input type="text"/> <input type="text"/> 74 75 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 80	

Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> MESA OIL, INC., BELEN, VALENCIA COUNTY, NM: FROM I-25, TAKE EXIT 195, SOUTH TO REINKEN AVE., EAST TO NM 47, 1 BLOCK SOUTH TO NM 304, RIGHT 3.7 MILES, LEFT AT SUD-CHEMIE, ON RIGHT. VALENCIA COUNTY.	Entry Time/Date 1000 hours / 11-6-2013	Permit Effective Date 9-29-2008
	Exit Time/Date 1138 hours / 11-6-2013	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Mike Fernandez, Site Manager (303) 426-2777 x 41	Other Facility Data N. 34° 35' 53.76" W. -106° 43' 56.44" SIC: 5093	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Larry Meers, Facility Owner 6395 East 80 th Avenue, Commerce City, CO 80022	Contacted Yes <input 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	M	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

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

1. Please see report for further details.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sarah Holcomb /s/ Sarah Holcomb	505-827-2798	12-6-2013
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
Bruce Yurdin /s/ Bruce Yurdin	505-827-2795	12-6-2013

NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>			<u>General</u>	
Inspection Type	CEI		Inspector Name	Sarah Holcomb
NPDES ID Number	NMR05B151		Telephone	505-827-2798
Inspection Date	11-6-2013		Entry Time	1000 hours
Inspector Type <i>(circle one)</i>	EPA	<input type="checkbox"/> State	Exit Time	1138 hours
Facility Sector/ SIC/Activity Code	Sector N SIC 5093		Signature	/s/ Sarah Holcomb

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	Mesa Oil, Inc. 20 Lucero Rd., Belen, NM 87002 Mailing address: 6395 East 80 th Avenue, Belen, NM 87002			
GPS Coordinates	Latitude	N. 34.5983°	Longitude	W. -106.7320°
Receiving Water(s)	Valencia County MS4 thence to the Rio Grande in segment 20.6.4.105 NMAC			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Mesa Oil, Inc.	
Facility Contact	Mr. Mike Fernandez, Site Manager	303-426-4777 x 41
Authorized Official(s)	Mr. Larry Meers, Facility Owner	303-426-7777

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
Permit Coverage	<input checked="" type="checkbox"/> Y	N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	N
Permit Type	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory	Y	<input type="checkbox"/> N
Operational Date	1996		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	4-7-2010		SWPPP Date	10-24-2013	
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?	Y	<input type="checkbox"/> N	Original SWPPP developed 10-16-2009; NOI submitted 4-7-2010 (facility alleged NOI submitted 12-31-2008). Update to SWPPP dated 10-24-2013. This checklist was completed based on the update.
Copy of the NOI and acknowledgment letter from EPA?	Y	<input type="checkbox"/> N	
Copy of the permit language?	Y	<input 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 type="checkbox"/> N	
<p>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)?</p> <p>Applicable to:</p> <ul style="list-style-type: none"> • 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?	<input checked="" type="checkbox"/> Y	N	SPCC was reviewed as part of this review. Updated October 2013.
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input type="checkbox"/> N	Old SWPPP contained a document called NEPA check. Certified Criterion A. Only documentation to support this is EDR NEPA Check and "Paragon's opinion that a discharge from the site would not significantly impact the river or the minnow." No documentation in new SWPPP.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input type="checkbox"/> N	No documentation in new SWPPP. Old SWPPP also relied on EDR NEPA Check for this information.
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	Old SWPPP indicated that no NEPA review was necessary under the EDR NEPA Check. New SWPPP does not mention NEPA. N/A
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/> Y	N	Mr. Larry Meers signed on 10-24-2013.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Used oil collection and processing facility.
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	<input type="checkbox"/> N	
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/> N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of all existing structural control measures?	Y	<input checked="" type="checkbox"/> 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	<input checked="" type="checkbox"/> N	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
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"/> N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	<input checked="" type="checkbox"/> N	
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/> N	Facility alleges that it is a no-discharge facility.
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"/> N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	<input checked="" type="checkbox"/> N	
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input type="checkbox"/> N	N/A
Does the site map contain locations of the following activities where these activities are exposed to precipitation?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
<ul style="list-style-type: none"> • Fueling stations Y • Vehicle and equipment maintenance and/or cleaning areas Y • Loading/unloading areas Y • Locations used for the treatment, storage or disposal of wastes Y • Liquid storage tanks Y • Processing and storage areas Y • 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 Y • Transfer areas for substances in bulk • Machinery Y 			
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	This evaluation has not been completed.
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	<input type="checkbox"/> N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	<input type="checkbox"/> N	The prior NMED inspection at this facility was triggered by multiple releases of oily wastewater to the ground at the facility. These releases are not mentioned anywhere in the SWPPP documentation.

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 • 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. 	Y	<input type="checkbox"/> N	The documentation simply states that there are no non-stormwater discharges.
Does salt storage occur at this facility?	Y	<input type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input type="checkbox"/> N	
<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"/> 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?	<input checked="" type="checkbox"/> 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	<input 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"/> Y	N	SWPPP documents trash pickup measures, and the cleaning of old equipment before it is placed into the facility's boneyard for storage.

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	
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	
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	
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 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?	<input checked="" type="checkbox"/> Y	N	Procedures are documented in the facility's SPCC.
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?	<input checked="" type="checkbox"/> Y	N	Training has been documented yearly.
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	Procedures are located in the facility's SPCC.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/> Y	N	SWPPP states measures are not needed due to site grading and impervious surface.
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 checked="" type="checkbox"/> N	Facility relies on asphalt milling and concrete berms to qualify as a no discharge facility.
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 checked="" 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?	<input checked="" type="checkbox"/> Y	N	
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?	<input checked="" type="checkbox"/> Y	N	SWPPP indicates training covers the SWPPP, proper material handling, site cleanliness, and BMPs.
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?	<input checked="" type="checkbox"/> Y	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	<input checked="" type="checkbox"/> N	On the day of the inspection, a garden hose was turned on and the inspector observed that the water was flowing over a heavily oil stained concrete pad.

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

This inspection was triggered by the NMED Ground Water Quality Bureau's need to follow up on their Administrative Compliance Order, generated from the July 2010 inspection previously conducted at this facility. The Administrative Compliance Order indicated that the facility was to engineer the site to be a non-discharge facility for stormwater, and they were to update their SWPPP. NMED SWQB conducted this inspection to assist in confirming those two issues.

At the time of the inspection, it was indicated that the facility was relying on the construction of two retention ponds (which have not yet been constructed) and a small asphalt berm at the perimeter of the facility (which is in place) to qualify as a non-discharge facility. The inspector requested engineering calculations of those structures to determine what size storm the structures were intended to hold on site, but those calculations were unavailable at the time of the inspection. The facility manager also indicated to the inspector that the management of stormwater is changing from the current management scheme. Currently, stormwater that falls onto the concrete loading/unloading pad is collected in sumps and pumped into a large holding tank, which is then trucked offsite by Waste Management for final disposal. Once the retention ponds are constructed (which will be lined with a liner from Colorado Lining International – an RPE liner (J-series) with a thickness of 36 mil.), the facility will move the collected stormwater in the sumps and transfer it to the retention pond. When the inspector asked if an oil/water separator was to be installed in conjunction with the pond, the facility manager indicated that it was not, and that any oil residues would be skimmed off the top of the pond. The updated SWPPP appears to indicate that it will have an oil/water separator.

Further clarification was received during a phone call with Ms. Lara Katz, legal counsel for Mesa Oil and Mr. Larry Meers, Owner of Mesa Oil, on December 3, 2013. Mr. Meers indicated that engineering calculations were done to ensure that the asphalt milling and concrete berms erected around the site in 2011 were adequate to ensure that the site would be no discharge during a 24 hour, 100 year rain event. Mr. Meers also indicated that he was under the impression that once the facility was made to be a no discharge facility, that he was automatically exempted from permit coverage at the site. However, the facility now understands that an NOI must be submitted to terminate coverage under the MSGP. Mesa Oil plans to resume required inspections and will plan to submit another NOI when the new MSGP is issued in Spring 2014.

Attached to this report are copies of the engineering calculations provided to NMED to make the facility no discharge.

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?	Y	<input checked="" type="checkbox"/> N	Facility manager showed daily inspection forms but most needed information from this permit was not documented.
Are inspections documented, including: <ul style="list-style-type: none"> • Date and time • Name and signature of inspector • Weather information and a description of discharge occurring at the time of the inspection • Previously unidentified discharges from site • Control measures needing maintenance or repairs • Failed control measures that need replacement • Incidents of noncompliance observed • Additional control measures needed. 	Y	<input checked="" type="checkbox"/> N	Not documented: Time, signature of inspector, weather information/discharge information, previously unidentified discharges from site, incidents of noncompliance observed, and additional control measures needed.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	N	
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	Y	<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. 	Y	N	

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	N	
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	N	
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input checked="" type="checkbox"/> N	No documentation was available to show that inspections were completed or that annual reports were sent to EPA.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	N	
Cover all areas of the facility?	Y	N	
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	

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	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	N	

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	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	N/A
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 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	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? <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	N	N/A
Exceptions, including (see 6.1 & 6.2): <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			
Sampled once per year?	Y	N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	Y	N	N/A
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	N/A
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/>	
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	<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>Minimal measures are taken to prevent stormwater from coming into contact with materials at the site. The crushed filters that were previously stored outdoors are now stored in containers that have lids.</p>
Good Housekeeping	<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>At the time of this inspection, the site appeared relatively clean. There were a few areas where oil had spilled onto the ground and needed to be cleaned up. The facility manager indicated that a piece of equipment had leaked the previous day.</p>
Preventative maintenance	<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>It does not appear that the daily inspections included with the documentation in the old SWPPP applied to the entire facility.</p>

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>Documentation indicates that spills are immediately cleaned up when they occur. A spill kit was not observed onsite during the course of this inspection.</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>Facility representative indicated that erosion control is unnecessary because of the grading of the site and because of the future ponds.</p>

NPDES Industrial Storm Water Checklist (MSGP)

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>Facility is planning to build two retention ponds, one at the southwest corner (large – 150,000 gallons) and one at the northwest corner of the site (small – size unknown).</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>

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>Facility staff pick up trash on site each day.</p>
Evidence of non-storm water discharges	<p>A garden hose was turned on and left running over the very oil stained concrete pad next to the warehouse area of the site. The water flowed toward the rail spur.</p>
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>No material tracking was observed on the day of this inspection.</p>

Notes on SWPPP Implementation and Sector Specific Requirements
<p>List and describe structural controls <i>(The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications)</i></p> <p>The facility contains a large number of oil retention tanks on site. The tanks are surrounded by a concrete secondary containment barrier which is designed to hold 110% of their largest tank, which is 350,000 gallons.</p> <p>A small asphalt berm was located around the perimeter of the site to prevent stormwater from leaving the site.</p>