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NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

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DAVE MARKLIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

**Certified Mail - Return Receipt Requested**

September 9, 2011

Steven Aguilar, Owner  
A-1 Quality Sand & Gravel  
Post Office Box 591  
Socorro, NM 87801

RE: Industrial Stormwater; SIC 1442; NPDES Compliance Evaluation Inspection; A-1 Quality Sand & Gravel;  
NPDES Permit No. NMR05GJ85; August 30, 2011

Dear Mr. Aguilar:

Enclosed please find a copy of the report 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.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report and required to correct any problems noted during the inspection and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify, in writing, both USEPA (Diana McDonald, USEPA (6EN-WM), 1445 Ross Ave., Dallas, Texas 75202) and NMED (at above address) regarding modifications and compliance schedules.

The NPDES Storm Water Multi-Sector General Permit for Industrial Activities (MSGP-2008) was reissued on September 29, 2008. The MSGP, fact sheet and other information on the industrial storm water program can be downloaded at <http://cfpub2.epa.gov/npdes/stormwater/msgp.cfm>.

Thank you for your cooperation and assistance during this inspection. If you have any questions about this inspection report, please contact me at (505) 827-1041.

Sincerely,  
/s/ Sandra Gabaldon  
Sandra Gabaldón  
Surface Water Quality Bureau

Cc: Marcia Gail Adams, EPA, Enforcement Section (6EN-AS) by e-mail  
Carol Peters-Wagnon, EPA (6EN-WM) by e-mail  
Diana McDonald, EPA (6EN-WM) by e-mail  
Samual Tates, EPA, (6W-AS) by e-mail

Addressee

Date

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Whitten-Hill, Darlene (6EN) by e-mail  
NMED District I by e-mail



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1   N   2   5   3   N   M   R   0   5   G   J   8   5   11   12   1   1   0   8   3   0   17   18   ~   19   S   20   2					
Remarks					
C O N S T R U C T I O N S A N D & G R A V E L					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67       69	70   3	71   N	72   N	73	74   75           80

#### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>A-1 QUALITY SAND &amp; GRAVEL</b> <b>1141 WEST HWY 60</b> <b>SOCORRO, NM 87801</b>  <b>VALENCIA COUNTY</b>	Entry Time /Date 1100 Hours / 08-30-2011	Permit Effective Date 9-29-2008
	Exit Time/Date 1405 hours/ 08-30-2011	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Patty Aguilar, Secretary John Aguilar, Assistant Manager	Other Facility Data N. 32.02799° W. -106.88956°  SECTOR J SIC 1442	
Name, Address of Responsible Official/Title/Phone and Fax Number Steven Aguilar, Owner (506)835-2527 Post Office Box 591 Socorro, NM 87801	Contacted Yes <input type="checkbox"/> No <input checked="" 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
M	Records/Reports	U	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	M	Storm Water	N	Other:

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

1. PLEASE SEE FURTHER EXPLANATIONS FOR DETAILS

Name(s) and Signature(s) of Inspector(s) <b>SANDRA GABALDON /s/ Sandra Gabaldon</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB 505-827-1041</b>	Date <b>SEPTEMBER 9, 2011</b>
Signature of Management QA Reviewer <b>RICHARD E. POWELL /s/ Richard E. Powell</b>	Agency/Office/Phone and Fax Numbers <b>505-827-2798</b>	Date <b>SEPTEMBER 9, 2011</b>

## NPDES Industrial Storm Water Checklist (MSGP)

National Database Information			General	
Inspection Type	Compliance Evaluation		Inspector Name	Sandra Gabaldon
NPDES ID Number	NMR05GJ85		Telephone	(505) 827-1041
Inspection Date	August 30, 2011		Entry Time	1100 Hours
Inspector Type <i>(circle one)</i>	EPA	<input type="checkbox"/> State	Exit Time	1405 Hours
Facility Sector/ SIC/Activity Code	SECTOR J SIC 1442		Signature	/s/ Sandra Gabaldon

Facility Location Information				
Name/Location/ Mailing Address	A-1 Quality Sand & Gravel Post Office Box 591 Socorro, NM 87801			
GPS Coordinates	Latitude	34.02799°	Longitude	W. -106.88956°
Receiving Water(s)	Unnamed Tributary, thence to the Rio Grande in segment 20.6.4.105 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Pablo and Canda Aguilar, Owners Steven Aguilar, Owner	(575) 835-2417
Facility Contact	Patty Aguilar John Aguilar	(575) 835-2417
Authorized Official(s)	Steven Aguilar, Owner	(575) 835-2417

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	<input type="checkbox"/> General	Individual	SWPPP Contents Satisfactory	Y	<input type="checkbox"/> N
Operational Date	1974		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	N
NOI/Application Date	04/24/2009		SWPPP Date	01/09/2008	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Review</b>			
<u>General</u>	<b>Notes:</b>		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	NOI Signed by Steven Aguilar, Owner
Copy of the permit language?	Y	<input checked="" type="checkbox"/>	
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"> <li>• Routine facility inspection (4.1.3)</li> <li>• Quarterly visual assessment (4.2.3)</li> <li>• Benchmark monitoring (6.2.1.3).</li> </ul>	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?	Y	<input checked="" type="checkbox"/>	Criterion A.
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"/>	Signed by Steven Aguilar, but not required certification statement in Appendix B.11
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?	Y	<input checked="" type="checkbox"/>	

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input type="checkbox"/> Y	<input checked="" 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?	<input type="checkbox"/> 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?	<input type="checkbox"/> 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?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input type="checkbox"/> 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?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A – No spills identified.
Does the site map contain locations of all storm water monitoring points?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	SWPPP states that site is self-contained. Alleged no discharge site.
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 type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	<input type="checkbox"/> Y	<input type="checkbox"/> N	No non-stormwater discharges identified.

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			<b>Notes:</b>
<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"> <li>• Fueling stations</li> <li>• Vehicle and equipment maintenance and/or cleaning areas</li> <li>• Loading/unloading areas</li> <li>• Locations used for the treatment, storage or disposal of wastes</li> <li>• Liquid storage tanks</li> <li>• Processing and storage areas</li> <li>• 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</li> <li>• Transfer areas for substances in bulk</li> <li>• Machinery</li> </ul>	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?	<input checked="" type="checkbox"/> Y	N	
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	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	N/A – SWPPP states no spills or leaks occurred in the three years prior to the preparation of this SWPPP.

## 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"> <li>• Date – 01-09-2008</li> <li>• Description of evaluation criteria</li> <li>• List of the outfalls or onsite drainage points directly observed</li> <li>• Different types of non-storm water discharges and source locations</li> <li>• Actions taken such as a list of control measures for elimination.</li> </ul>	Y	<input type="checkbox"/> N	Not certified, but states no non-stormwater discharges
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 type="checkbox"/> N	No sampling data from previous permit
<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 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 type="checkbox"/> 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)?	Y	<input type="checkbox"/> N	Language in SWPPP is very generic and doesn't specify good housekeeping measures at this site.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
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?	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 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?	<input type="checkbox"/> Y	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 type="checkbox"/> Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input 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	Training was done in 2007 and 2008. No current documentation provided.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input type="checkbox"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>		<b>Notes:</b>	
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/>	N	Water suppression for dust. Berms provided. Entrance and roads are graveled.
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?	Y	N	N/A
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	
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"/>	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"/>	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/>	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	N	No non-stormwater discharged observed on date of inspection.

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### **Site Description:**

This is a large 220 acre site. The area is bermed along the perimeter and all raw material piles are within a depression in the middle of the site. The site is located approximately 2-3 miles from the Rio Grande. There is an office, scales, laboratory and maintenance shop on site. There is a retention pond in the southeastern corner of the site. The asphalt plant is part of the larger sand and gravel operation.

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
<b>Routine Facility Inspections</b>			
Are routine facility inspections conducted at least quarterly while facility operating?	<input checked="" type="checkbox"/> Y	N	
Are inspections documented, including: <ul style="list-style-type: none"> <li>• Date and time: No inspection dates, only dates of quarters.</li> <li>• Name and signature of inspector -YES</li> <li>• Weather information and a description of discharge occurring at the time of the inspection - No</li> <li>• Previously unidentified discharges from site - No</li> <li>• Control measures needing maintenance or repairs - No</li> <li>• Failed control measures that need replacement – No</li> <li>• Incidents of noncompliance observed - No</li> <li>• Additional control measures needed. - No</li> </ul>	Y	<input checked="" type="checkbox"/> N	Inspections: 03/31/2011, 06/30/2011, 03/31/2010, 06/30/2010, 07-2010 to 09-2010, 10-2010 to 12-2010, 01-2009 to 03-2009, 04-2009 to 06-2009, 07-2009 to 09-2009, 10-2009 to 12-2009, 01-2008 to 03-2008, 04-2008 to 06-2008, 07-2008 to 09-2008, 10-2008 to 12-2008.  <b><i>There is one set of inspections for each site owned by A-1 Quality. This includes the asphalt plant, sand and gravel site as well as the Redi-Mix site.</i></b>  It is noted on 09-17-2009 that the pond filled (pond at Redi-Mix site) but there was no overflow observed.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>• Inactive and unstaffed sites</li> </ul>	Y	N	N/A
<b>Quarterly Visual Assessment</b>			
Are quarterly visual assessments conducted?	Y	<input checked="" type="checkbox"/> N	None previously done.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>• Collected in a clean, clear glass or plastic container.</li> </ul>	Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>			
Are assessments documented, including: <ul style="list-style-type: none"> <li>• Sample location</li> <li>• Sample collection date/time &amp; visual assessment date/time</li> <li>• Personnel collecting sample &amp; performing assessment and their signature</li> <li>• Nature of the discharge (runoff or snowmelt)</li> <li>• Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators)</li> <li>• Probable sources of contamination</li> <li>• If applicable, reason for not taking samples within 1<sup>st</sup> 30 minutes.</li> </ul>	Y	N	
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> <li>• Adverse weather conditions</li> <li>• Climates with irregular storm water runoff</li> <li>• Areas subject to snow</li> <li>• Substantially identical outfalls (per 5.1.5.2)</li> <li>• Inactive and unstaffed sites.</li> </ul>	Y	N	N/A
<b>Comprehensive Site Inspections</b>			None done.
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input checked="" type="checkbox"/> N	
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	<input checked="" type="checkbox"/> N	
Cover all areas of the facility?	Y	<input checked="" type="checkbox"/> 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	<input checked="" type="checkbox"/> N	

## NPDES Industrial Storm Water Checklist (MSGP)

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

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring (Part 6)</b>			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	<input checked="" type="checkbox"/> N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	<input checked="" type="checkbox"/> N	
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	No sampling done.
<b>Benchmark Monitoring</b>			Not done.
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>• Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall</li> <li>• Prior to commingling.</li> </ul>	Y	N	According to SWPPP, no discharge facility.  Benchmark monitoring required for Sector J: Nitrate plus Nitrite Nitrogen, Total Suspended Solids (TSS)
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)

<b>Monitoring</b>			
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> <li>Make the necessary modifications</li> <li>Continue quarterly monitoring</li> <li>Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA</li> <li>Natural background pollutant level documentation</li> </ul>	Y	N	
Exceptions, including (see 6.1 & 6.2): <ul style="list-style-type: none"> <li>Adverse weather conditions</li> <li>Climates with irregular storm water runoff</li> <li>Snowmelt</li> <li>Substantially identical outfalls (per 5.1.5.2)</li> <li>Inactive and unstaffed sites.</li> </ul>	Y	N	
<b>Effluent Limitations Monitoring</b>			Alleged no discharge facility.
Sampled once per year?	Y	N	Effluent limitations include: pH
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
<b>Other Required Monitoring</b>			
<ul style="list-style-type: none"> <li>State or Tribal provisions</li> <li>Discharges to impaired waters</li> <li>Additional monitoring required by EPA.</li> </ul>	Y	N	
<b>Reporting (Part 7)</b>			
<u>General</u>	Notes:		
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	No monitoring data
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/> 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	Alleged no discharge facility

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Implementation</b>	
<p><b>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</b></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>Berming is provided along the perimeter of the site to minimize runoff.</p> <p>Raw material piles are retained within a depression on site.</p>
<p><b>Good Housekeeping</b></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>Vehicle maintenance is done indoors.</p> <p>All raw materials are kept in well organized piles with a depression on site.</p>
<p><b>Preventative maintenance</b></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>Repair and maintenance of equipment is done as needed.</p> <p>Regular inspections are done to identify any issues with leaking valves, seals or hoses.</p>

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Implementation</b>	
<b>Spill Prevention and Response</b>	<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>No spills have occurred on site.</p> <p>Maintenance of equipment is done indoors.</p>
<b>Erosion and Sediment Controls</b>	<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>There is a graveled entrance that minimizes erosion and sedimentation.</p> <p>Water trucks spray piles and roadways three times per week.</p>
<b>Management of Runoff</b>	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Berm is located around perimeter of site.</p> <p>Raw materials are maintained within a depression on site.</p>
<b>Salt Storage Piles</b>	<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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<b>Waste, Garbage and Floatable Debris</b>	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>No floatables observed.</p> <p>The site has outdated metal equipment on site.</p> <p>Garbage is maintained in proper receptacles.</p>
<b>Evidence of non-storm water discharges</b>	<p>None.</p>
<b>Dust Generation and Vehicle Tracking of Industrial Materials</b>	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Graveled entrance.</p> <p>Water spraying</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)*

Berm along perimeter of site.

Raw materials are maintained within a depression, minimizing runoff.