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NEW MEXICO
ENVIRONMENT DEPARTMENT

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DAVE MARLIN
Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

November 16, 2011

Mary Lucy Baca, Interim City Manager
City of Belen
100 S. Main Street
Belen, NM 87002

RE: Industrial Stormwater; SIC 4581; NPDES Compliance Evaluation Inspection; Belen Alexander Airport;
NPDES Permit No. NMR05GV27; October 20, 2011

Dear Ms. Baca:

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 Gabaldón

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 Bates, EPA, (6W-AS) by e-mail
Darlene Whitten-Hill, EPA (6EN-WC) by e-mail

Addressee

Date

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NMED District I, 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	N	2	5	3	N	M	R	0	5	G	V	2	7	11	12	1	1	1	0	2	0	17	18	C	19	S	20	~
Remarks																												
A I R P O R T																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved												
67						70						71		72		73 74 75 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> I-25 South, Exit 191. West on Camino Del Llano. Follow signs to Belen Alexander Airport.		Entry Time /Date 0900 Hours / 10-20-2011		Permit Effective Date 9-29-2008			
		Exit Time/Date 1125 Hours / 10-20-2011		Permit Expiration Date 9-29-2013			
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Robert Uecker, Airport Manager (505) 966-2650				Other Facility Data N. 34.34606° W. -106.82944° Sector S SIC 4581			
Name, Address of Responsible Official/Title/Phone and Fax Number Mary Lucy Baca, Interim City Manager / (505) 966-2733 City of Belen 100 South Main Street Belen, NM 87002							
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	S	Operations & Maintenance	N	CSO/SSO
U	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		Other:

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

1. The inspector arrived on-site at approximately 0900 hours and was greeted by Mr. Uecker, Airport Manager.
2. The inspector made introductions, presented credentials and explained the purpose of the inspection.
3. The inspector toured the facility and had an exit interview with Mr. Uecker to present the preliminary findings.
4. The inspector left the facility at approximately 1125 hours on 10-20-2011.

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldón /s/ Sandra Gabaldón		Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/(505) 827-0160		Date 11-16-2011	
Signature of Management QA Reviewer Richard Powell /s/Richard Powell		Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-2798/(505) 827-0160		Date 11-16-2011	

NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>			<u>General</u>		
Inspection Type	Compliance Evaluation Inspection		Inspector Name	Sandra Gabaldón	
NPDES ID Number	NMR05GV27		Telephone	(505) 827-1041	
Inspection Date	October 20, 2011		Entry Time	0900 Hours	
Inspector Type <i>(circle one)</i>	EPA	State	EPA Oversight	Exit Time	1125 Hours
Facility Sector/ SIC/Activity Code	Sector S SIC 4581		Signature	/s/ Sandra Gabaldon	

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	Belen Alexander Municipal Airport 4902 Camino Del Llano Belen, New Mexico 87002			
GPS Coordinates	Latitude	34.34606°	Longitude	-106.82944°
Receiving Water(s)	Rio Grande			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Mary Lucy Baca, Interim City Manager City of Belen	(505) 966-2733
Facility Contact	Robert Uecker, Manager	(505)966-2650
Authorized Official(s)	Mary Lucy Baca, Interim City Manager	(505) 966-2733

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
Permit Coverage	<input checked="" type="checkbox"/>	N	SWPPP Prepared & Available	<input checked="" type="checkbox"/>	N
Permit Type	General	Individual	SWPPP Contents Satisfactory	Y	<input checked="" type="checkbox"/>
Operational Date	1978		SWPPP Implementation Satisfactory	Y	<input checked="" type="checkbox"/>
NOI/Application Date	02/17/10		SWPPP Date	Feb 2010	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	Y	N	Date on Notice of Intent was dated February 17, 2010. The SWPPP states only February 2010. It is unknown at this time if the SWPPP was completed prior to February 17, 2010. The SWPPP was prepared by Gordon Environmental, Inc.
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	
Copy of the permit language?	<input checked="" type="checkbox"/>	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	<input checked="" type="checkbox"/>	
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 (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	Y	N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	<input checked="" type="checkbox"/>	SWPPP does not mention any other relevant documents such as the SPCC
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	No documentation provided in the SWPPP. Criterion A checked on the NOI.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input checked="" type="checkbox"/>	No documentation provided in the SWPPP
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 certified by Robert Uecker, Airport Manager.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" 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 checked="" type="checkbox"/>	N	
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	
Does the site map contain the size of the property in acres?	<input checked="" type="checkbox"/>	N	Total Acreage: 684 Developed Acreage: 150
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/>	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/>	N	Two detention ponds identified. One engineered pond on the NE corner another natural depression pond on the SW corner.
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"/>	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/>	Series of culverts leading to detention ponds not identified on site map.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<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 checked="" type="checkbox"/>	N	SWPPP states no significant spills or leaks have been identified in the last three years.
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/>	N	One outfall identified and labeled as "outfall #30".
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"/>	N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of the following activities where these activities are exposed to precipitation?	Y	<input checked="" type="checkbox"/>	Fueling truck identified on SWPPP, however, located in a different area than what is stated on the site map.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
<ul style="list-style-type: none"> • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading/unloading areas • Locations used for the treatment, storage or disposal of wastes • Liquid storage tanks • Processing and storage areas • 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 • Transfer areas for substances in bulk • Machinery 			
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	Topography of area is flat. No apparent run-on to site with the expansive 684 acres.
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	
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	SWPPP states no spills or leaks have occurred for three years prior to the preparation of the 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"> • 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	
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 gathered during previous permit term.
<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?	Y	<input type="checkbox"/> N	No documentation provided in SWPPP for the selection or design of control measures being based on procedures provided in 2.1.1 of the MSGP.
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"/> Y	N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants		Notes:	
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<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	<p>SWPPP provides a maintenance log template. The log has never been filled out.</p> <p>The language in the SWPPP is vague and only states, "timely inspection & maintenance of stormwater management devices".</p>
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	Use of site spill kits for leaks will be implemented. Contact local fire agency in the event of larger spills.
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	Used oil is kept on site in very small amounts (<5 gallons). Each container is labeled and stored indoors.
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	Employee training template provided in SWPPP. However, this has never been filled out and no training has ever been 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	Emergency response agencies along with regulatory agency telephone numbers provided in the SWPPP.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants	Notes:		
Does the SWPPP document erosion and sediment controls?	Y	<input 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?	Y	<input type="checkbox"/> N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	<input type="checkbox"/> N	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	Y	<input type="checkbox"/> N	
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	Y	<input type="checkbox"/> N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input type="checkbox"/> Y	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input type="checkbox"/> Y	N	Off-site tracking prevented by regular sweeping of impervious surfaces at entrances.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

The Belen Alexander Airport (BAA) is owned and operated by the City of Belen, on approximately 600+ acres. The area surrounding the airport is rural and undeveloped. Daily operations are conducted by the airport authority (BAA) and numerous airport tenants. BAA maintains the airport grounds, taxiways and runways. No de-icing is performed at this airport. There are numerous tenants which provide various services at the airport. Alexander Aero (AA) is a fixed based operator who provides aircraft fueling and storage services. Shiloh Aviation provides comprehensive maintenance and overhaul. New Mexico Aircraft Propeller performs service, overall and repair of aircraft propellers. Blue Skies Consulting, LLC., provides aerial mapping services to various clients throughout New Mexico. Private aircraft owners store their private aircraft onsite and at times perform light maintenance on their aircraft in their private enclosed hangers.

The BAA is enclosed with fencing along the perimeter of their property. They also have two detention ponds onsite to maintain stormwater run-off and run-on. There is a dirt berm along the east end of the property. There are numerous culverts that lead to the detention ponds which appeared to be maintained. The grass is mowed periodically and trash is removed weekly. The site is neat and orderly.

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
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
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	<input checked="" type="checkbox"/> 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	<input checked="" type="checkbox"/> 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	<input checked="" type="checkbox"/>	
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites. 	Y	<input checked="" type="checkbox"/>	No exceptions provided in SWPPP.
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input checked="" type="checkbox"/>	No comprehensive site inspections performed.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	<input checked="" type="checkbox"/>	
Cover all areas of the facility?	Y	<input checked="" type="checkbox"/>	
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	Y	<input checked="" type="checkbox"/>	

NPDES Industrial Storm Water Checklist (MSGP)

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

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>			Notes:
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	No deicing occurs at this airport.
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	No effluent limitations guidelines for Sector S.
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	<input checked="" type="checkbox"/> N	
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	No samples taken.
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	Benchmark monitoring required only if use of more than 100,000 gallons of glycol-based deicing chemicals and/or 100 tons or more of urea on an average annual basis is used for deicing activities. NO DEICING at this airport.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? <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	
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	
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	No effluent limitations for Sector S
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	<input checked="" type="checkbox"/> N	
Reporting (Part 7)			
<u>General</u>	Notes:		
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	N/A
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	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> <ol style="list-style-type: none"> 1. Berming on east side of property. 2. Two detention basins maintain stormwater run-off / run-on. 3. Impervious surfaces with curbing 4. Kitty litter used in the event of minor spills. 5. Used oil stored indoors.
<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> <ol style="list-style-type: none"> 1. All used oil (5 gallon cans) labeled. 2. Sweeping done as needed. 3. Trash pick-up done on a regular basis (weekly)
<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> <ol style="list-style-type: none"> 1. Manager stated that preventative maintenance performed on equipment on an as needed basis. No documentation provided.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Kitty litter provided for any fuel spills that may occur. Fueling takes place on impervious surface.</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> <ol style="list-style-type: none"> 1. Culverts maintained. 2. Rip-rap noted at Outfall #30.
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 diverted to detention ponds with the use of culverts and curbing.</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>

NPDES Industrial Storm Water Checklist (MSGP)

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>Garbage pick-up done weekly. No debris noted on site during this inspection.</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>Sweeping done to avoid off-site tracking</p>

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Implementation and Sector Specific Requirements

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

1. Two detention ponds.
2. Berming on east side of property.