



NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

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**Certified Mail – Return Receipt Requested**

September 1, 2011

Mr. Frank Amador, Owner  
Amador Complete Recycling, Inc.  
470 NE Frontage Rd.  
Polvadera, NM 87828

**Re: Industrial Storm Water, SIC 5093, NPDES Compliance Evaluation Inspection, Amador Complete Recycling Inc., NMR05H252, August 30, 2011**

Dear Mr. Amador,

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 the cooperation and assistance that you provided during my visit to your site. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 222-9587.

Sincerely,  
*/s/ Sarah Holcomb*  
Sarah Holcomb  
Environmental Scientist/Specialist  
Surface Water Quality Bureau

Cc: Marcia Gail Adams, USEPA (6EN-AS) via e-mail  
Samuel Tate, USEPA (6EN-AS) via e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail  
Diana McDonald, USEPA (6EN-WM) via e-mail  
Sonia Hall, USEPA (6EN-AS) via e-mail  
Hannah Branning, USEPA (6EN-AS) via e-mail  
Jennifer Ickes, NMED District I Manager (via 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	H	2	5	2	11	12	1	1	0	8	3	0	17	18	~	19	S	20	2	
Remarks																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67						70	2	71	N	72	N	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> ) <b>AMADOR COMPLETE RECYCLING INC, POLVADERA, NM: FROM I-25, TAKE EXIT 163, TURN LEFT AND TURN RIGHT ONTO THE FRONTAGE RD. (HEADED SOUTH). FOLLOW FRONTAGE RD TO AMADOR RECYCLING, AT FRONTAGE RD AND COUNTY ROAD 408.</b>		Entry Time /Date 0920 HOURS / 8-30-2011	Permit Effective Date 9-29-2008
		Exit Time/Date 1040 HOURS / 8-30-2011	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. FRANK AMADOR, OWNER (505) 804-0793		Other Facility Data GPS: N. 34° 13.035' W. -106° 55.162'  SIC 5093 & 5015	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. FRANK AMADOR, OWNER 470 NE FRONTAGE RD., POLVADERA, NM 87828 (505) 804-0793		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

**Section C: Areas Evaluated During Inspection**

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

S	Permit	N	Flow Measurement	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)**

- PLEASE SEE REPORT FOR FURTHER EXPLANATIONS.
- SARAH HOLCOMB AND SANDRA GABALDON OF THE NMED SWQB ARRIVED ONSITE AT 0920 HOURS ON 8-30-2011 AND CONDUCTED AN ENTRANCE INTERVIEW WITH MR. FRANK AMADOR, OWNER, WHERE THEY MADE INTRODUCTIONS, PRESENTED CREDENTIALS AND EXPLAINED THE PURPOSE OF THE INSPECTION.
- THIS SWPPP APPEARED TO BE A CARBON COPY FROM ANOTHER FACILITY. SITE SPECIFIC INFORMATION WAS NOT INCLUDED TO ADDRESS ISSUES AT THIS PARTICULAR SITE.
- AN EXIT INTERVIEW TO DISCUSS PRELIMINARY FINDINGS OF THE INSPECTION WAS CONDUCTED AT APPROXIMATELY 1030 HOURS WITH MR. AMADOR AT THE FACILITY.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 9-1-2011
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 9-1-2011

National Database Information			General		
Inspection Type	CEI		Inspector Name	Sarah Holcomb	
NPDES ID Number	NMR05H252		Telephone	505-222-9587	
Inspection Date	8-30-2011		Entry Time	0920 hours	
Inspector Type (circle one)	EPA	<input type="checkbox"/> State	EPA Oversight	Exit Time	1040 hours
Facility Sector/ SIC/Activity Code	Sector N, SIC 5093 Sector M, SIC 5015		Signature	/s/ Sarah Holcomb	

Facility Location Information				
Name/Location/ Mailing Address	Amador Complete Recycling, Inc. 470 NE Frontage Rd., Polvadera, NM 87828			
GPS Coordinates	Latitude	34° 13.035'	Longitude	-106° 55.162'
Receiving Water(s)	Socorro Main Canal, thence to Rio Grande in 20.6.4.105 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Amador Complete Recycling Inc.	
Facility Contact	Mr. Frank Amador, Owner	505-804-0793
Authorized Official(s)	Mr. Frank Amador	505-804-0793

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 checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory	Y	<input type="checkbox"/> N
Operational Date	2008		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	7-29-2010		SWPPP Date	6-30-2010	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	Prepared by Environmental Safety Solutions out of El Paso.
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?	<input checked="" type="checkbox"/>	N	However, there were only two inspection reports.
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 – no other relevant documents.
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	Certified Criterion A with no documentation.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/>	N	Mr. Amador signed the SWPPP on 6-30-2010
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>			<u>Notes:</u>
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Auto and metal recycling 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 type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Is there a site specific site map?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain the size of the property in acres?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Site is 4.1 acres.
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input type="checkbox"/> Y	<input checked="" 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 checked="" type="checkbox"/> N	
Does the site map contain locations of all storm water monitoring points?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input 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 checked="" type="checkbox"/> N	No MS4 in this area.
Does the site map contain locations and descriptions of all non-storm water discharges?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain locations of the following activities where these	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	

## NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
activities are exposed to precipitation? • 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	<input type="checkbox"/> N	
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	<input type="checkbox"/> N	
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?	Y	<input type="checkbox"/> 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	SWPPP states that there have been no spills or leaks, but inspectors noted that there were many small leaks on the ground at the time of the inspection.

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
<p>Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include:</p> <ul style="list-style-type: none"> <li>• Date <b>Yes</b></li> <li>• Description of evaluation criteria <b>Yes</b></li> <li>• List of the outfalls or onsite drainage points directly observed <b>Yes</b></li> <li>• Different types of non-storm water discharges and source locations <b>N/A</b></li> <li>• Actions taken such as a list of control measures for elimination. <b>N/A</b></li> </ul>	<input checked="" type="checkbox"/>	N	
Does salt storage occur at this facility?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input checked="" type="checkbox"/>	

<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	Y	<input checked="" type="checkbox"/>	

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			<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	New Opportunities LLC does oil pick ups for this facility.
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?	<input checked="" 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?	Y	<input type="checkbox"/> N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	Y	<input type="checkbox"/> N	Facility staff pick up the contaminated soil and put it onto the crusher so that it is off the ground.
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 is given in the method mentioned in the prior question, however, there was no spill kit available on site at the time of the inspection for larger spills.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	N	According to the facility representative, the facility has not had a reportable quantity spill.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
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?	<input checked="" type="checkbox"/> Y	N	There is a dirt berm located around the perimeter of the site to partially contain stormwater.
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 – no salt storage
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/> Y	N	However, there is no documentation that training has actually occurred.
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?	Y	<input type="checkbox"/> N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	<input type="checkbox"/> N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### **Site Description:**

The Amador Complete Recycling facility accepts ferrous and non-ferrous metals and junk cars for recycling.

In order to qualify for permit coverage, a facility must certify that they have met requirements under the Endangered Species Act, and the National Historic Preservation Act. The facility's consultant, ESS Environmental and Safety Solutions, Inc., indicated in the SWPPP that the facility certified eligibility for the permit under Criterion A for NHPA purposes, and under Criterion A for ESA purposes. To qualify under Criterion A with respect to the Endangered Species Act, a facility must prove that their stormwater discharge will have NO effect in the action area, which includes the area downstream of a facility. There are a number of endangered species and critical habitat in the Rio Grande in this area, including the Rio Grande Silvery Minnow and the Willow Flycatcher. There was no paperwork included in the SWPPP to indicate that a qualified person had done the research to show that the facility's stormwater discharge would have no effect on the species or the critical habitat.

There were no maps included with the SWPPP. In Part 5.1.2 of the permit, it states that a facility must include both a general location map and a site specific facility map. Neither of these documents were included in the SWPPP.

The SWPPP did not include a site specific section discussing the selection of BMPs for the facility with respect to the requirements in Part 2 of the permit. Part 2 discusses avoiding exposing materials to stormwater, using control measures in combination, assessing the type and quantity of pollutants and minimizing impervious surface/infiltrating runoff onsite.

## 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?	Y	<input checked="" type="checkbox"/> N	One quarterly inspection had been conducted on 9-29-2010.
Are inspections documented, including: <ul style="list-style-type: none"> <li>• Date and time <b>Yes</b></li> <li>• Name and signature of inspector <b>Yes</b></li> <li>• Weather information and a description of discharge occurring at the time of the inspection <b>No</b></li> <li>• Previously unidentified discharges from site <b>No</b></li> <li>• Control measures needing maintenance or repairs <b>No</b></li> <li>• Failed control measures that need replacement <b>No</b></li> <li>• Incidents of noncompliance observed <b>No</b></li> <li>• Additional control measures needed. <b>No</b></li> </ul>	Y	<input checked="" type="checkbox"/> N	
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	Facility representative indicated that there has been no runoff from the site.
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	N/A

## 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	N/A
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	Facility had not submitted an exception for location in an area with irregular stormwater runoff.
<b>Comprehensive Site Inspections</b>			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input checked="" type="checkbox"/>	N	One comprehensive inspection was conducted on 11-17-2010.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input checked="" type="checkbox"/>	N	
Cover all areas of the facility?	<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"/>	No monitoring data was evaluated.

## 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 type="checkbox"/> N
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> <li>• Date of inspection <b>Yes</b></li> <li>• Names and titles of personnel making the inspection <b>Yes</b></li> <li>• Findings from examination of areas of facility from Part 4.3.1 <b>No findings</b></li> <li>• All observations relating to implementation of control measures <b>No observations</b></li> <li>• Any required revisions to the SWPPP resulting from inspection <b>No revisions</b></li> <li>• Any incidents of noncompliance identified OR certification that facility is in compliance with the permit <b>Certified in compliance</b></li> <li>• A statement signed in accordance with Appendix B, Subsection 11 <b>No</b></li> </ul>	Y	<input type="checkbox"/> N

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring (Part 6)</b>			
<u>General</u>	<b>Notes:</b>		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	<input type="checkbox"/> N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	<input 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	N/A – no samples have been taken at this site.
<b>Benchmark Monitoring</b>			
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	<input type="checkbox"/> N	Monitoring has not been conducted.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	<input type="checkbox"/> N	Facility may be eligible for the irregular storm water runoff exception but has not sent in a request to EPA.
Is the average of the first four quarterly samples < the parameter benchmark?	Y	<input type="checkbox"/> 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	<input checked="" type="checkbox"/>	
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	Facility may want to submit an exception to allow them to sample during the monsoon period.
<b>Effluent Limitations Monitoring</b>			N/A
Sampled once per year?	Y	N	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
<b>Other Required Monitoring</b>			N/A
<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	<input checked="" type="checkbox"/>	
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	<input checked="" type="checkbox"/>	

## 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>There is a large dirt berm surrounding the property. The facility has a moveable impervious pad that they use under vehicles when they drain fluids. Engines and transmissions that still contain fluids are stored in an old school bus. Maintenance of equipment is done indoors, except for maintenance on the site crusher.</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>The site was in need of some good housekeeping measures. Metal materials (i.e. aluminum cans, old glass, scrap parts) were all over the ground. Site could use some organization.</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>Visual checks are conducted to ensure equipment is not leaking.</p>

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<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>Facility staff periodically pick up oil contaminated dirt and place it in the facility's crusher so that it is not on the ground. Facility staff do not have a contractor remove the contaminated dirt from the site. No spill kits were located on site.</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>The facility representative indicated that the berm should contain all stormwater onsite.</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>The facility representative indicated a few areas of the site where rainwater tends to accumulate, and indicated that there has not been enough rain in the area to generate a runoff event.</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>No salt storage occurs at this facility.</p>

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SWPPP Implementation	
<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>According to the facility representative, trash pick ups are done occasionally.</p>
<b>Evidence of non-storm water discharges</b>	<p>None observed on the date of this inspection.</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>

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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)*

The inspectors noted that battery storage was occurring outside. The batteries (6 at the time of the inspection) were stored on a pallet. Facility representatives indicated that they are left outside until a couple of "layers" of batteries had accumulated, and then they would be taken offsite for disposal. Batteries should not be exposed to stormwater due to lead, as indicated in Part 8.N.3.1.6 of the permit).

The structural controls noted onsite were the dirt berm at the perimeter, the old school bus where engines and transmissions were stored, and the shed where used oil is stored, as well as the shop where maintenance activities are conducted. No effort is currently made to cover outdoor materials or to divert stormwater in the event of a rainstorm (as indicated should be done in Part 8.N.3.1.2 of the permit).

The facility did not have access to a sampling kit in the event of a rainstorm. The consultant indicated that this would be remedied in the near future. When sampling occurs, the facility will need to ensure that the sampling is conducted for both Sector M and Sector N requirements due to the co-location of activities at the site. This means sampling must be done for: TSS (total suspended solids), aluminum, iron, lead, COD (chemical oxygen demand), copper and zinc.

Additionally, when the site map is generated for this facility, the outdoor storage areas must be indicated on the map, as well as the location of the crusher. Locations of the site used for dismantling, storage and maintenance of junk cars must also be noted, as well as dismantling areas, parts storage areas, and liquid storage tanks and drums.

# NPDES Industrial Storm Water Checklist (MSGP)

## NMED/SWQB Official Photograph Log Photo # 1

Photographer: Sarah Holcomb	Date: 8-30-2011	Time: 1015 hours
City/County: Polvadera/Socorro County		
Location: Amador Complete Recycling facility		
Subject: Shed used for used oil storage.		



# NPDES Industrial Storm Water Checklist (MSGP)

## NMED/SWQB Official Photograph Log Photo # 2

Photographer: Sarah Holcomb	Date: 8-30-2011	Time: 1016 hours
City/County: Polvadera/Socorro County		
Location: Amador Complete Recycling facility		
Subject: Old school bus used for storage of engines and transmissions that still contained fluids.		



# NPDES Industrial Storm Water Checklist (MSGP)

## NMED/SWQB Official Photograph Log Photo # 3

Photographer: Sarah Holcomb	Date: 8-30-2011	Time: 1018 hours
City/County: Polvadera/Socorro County		
Location: Amador Complete Recycling facility		
Subject: Facility's crusher, also used for oil contaminated soil storage.		



# NPDES Industrial Storm Water Checklist (MSGP)

## NMED/SWQB Official Photograph Log Photo # 4

Photographer: Sarah Holcomb	Date: 8-30-2011	Time: 1026 hours
City/County: Polvadera/Socorro County		
Location: Amador Complete Recycling facility		
Subject: Outdoor storage of batteries, near the facility entrance.		

