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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**

August 11, 2011

Armando Reyna, President  
American Redi-Mix, LLC  
1860 Copper Loop  
Las Cruces, NM 88007

RE: Industrial Stormwater; SIC 3273; NPDES Compliance Evaluation Inspection; American Redi-Mix, LLC;  
NPDES Permit No. NMR05H405; July 26, 2011

Dear Mr. Reyna:

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,

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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NMED District III 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   H   4   0   5   11   12   1   1   0   7   2   6   17   18   ~   19   S   20   2					
Remarks					
C O N C R E T E R E D I - M I X					
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>AMERICAN RED-MIX, LLC</b> <b>1860 Copper Loop</b> <b>Las Cruces, NM 88007</b>  <b>DONA ANA COUNTY</b>	Entry Time /Date 1440 Hours / 07-26-2011	Permit Effective Date 9-29-2008
	Exit Time/Date 1555 hours/ 07-26-2011	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Amy Reyna, Manager, (575) 528-0600	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Armando Reyna, President (575) 528-0600 1860 Copper Loop Las Cruces, NM 88007	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	N. 32.18.211° W. -106.48.447°  SIC 3273 Sector E

#### Section C: Areas Evaluated During Inspection

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

U	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</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB 505-827-1041</b>	Date <b>August 11, 2011</b>
Signature of Management QA Reviewer <b>RICHARD E. POWELL</b>	Agency/Office/Phone and Fax Numbers <b>505-827-2798</b>	Date <b>August 11, 2011</b>

## NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>			<u>General</u>	
Inspection Type	Compliance Evaluation		Inspector Name	Sandra Gabaldon
NPDES ID Number	NMR05H405		Telephone	(505) 827-1041
Inspection Date	July 26, 2011		Entry Time	1440 Hours
Inspector Type <i>(circle one)</i>	EPA	State	EPA Oversight	Exit Time
Facility Sector/ SIC/Activity Code	Sector E / SIC 3273		Signature	

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	American Redi-Mix, LLC 1860 Copper Loop Las Cruces, NM 88007			
GPS Coordinates	Latitude	N. 32°18.211	Longitude	-106°48.447
Receiving Water(s)	Las Cruces MS4, thence to the Rio Grande in NMAC 20.6.4.101			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Armando Reyna, President/Owner	(575)528-0600
Facility Contact	Amy Reyna, Manager	(575) 528-0600
Authorized Official(s)	Armando Reyna, President/Owner	(575) 528-0600

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
Permit Coverage	<input checked="" type="checkbox"/> Y	N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	N
Permit Type	General	Individual	SWPPP Contents Satisfactory	Y	<input type="checkbox"/> N
Operational Date	January 2009		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	09/13/10		SWPPP Date	06/2010	
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	SWPPP: June, 2010 NOI: September 13, 2010
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	NOI signed by Amy Reyna, Manager; not by the responsible corporate officer, Mr. Armando Reyna.
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	
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	<input checked="" type="checkbox"/>	
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)?	<input checked="" type="checkbox"/>	N	
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/>	N	Signed by Armando Reyna, President/Owner
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	2.1 Acres
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	
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 checked="" type="checkbox"/>	N	Las Cruces MS4, thence to the Rio Grande in Segment 20.6.4.101 NMAC.  TMDL for Bacteria
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<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 checked="" type="checkbox"/>	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	N/A – No spills identified.
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input checked="" type="checkbox"/>	N	Identified as outfall 1
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/>	

## 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 - Yes</li> <li>• Vehicle and equipment maintenance and/or cleaning areas - Yes</li> <li>• Loading/unloading areas - Yes</li> <li>• Locations used for the treatment, storage or disposal of wastes - Yes</li> <li>• Liquid storage tanks - Yes</li> <li>• Processing and storage areas - Yes</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 - Yes</li> <li>• Transfer areas for substances in bulk</li> <li>• Machinery - Yes</li> </ul>	<input checked="" 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 checked="" type="checkbox"/>	On the east side of property is CEMEX Redi-Mix, which is separated from the property by a concrete wall. No run-on associated with this significant pollutant source.
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	N/A
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input checked="" type="checkbox"/>	N	Rock washing, vehicle and equipment maintenance, and truck wash-out.
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	

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		<b>Notes:</b>	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> <li>• Date</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>	<input checked="" type="checkbox"/>	N	Signed and certified by Armando Reyna on July 1, 2010.
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	N	N/A
<u>Controls to Reduce Pollutants</u>		<b>Notes:</b>	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input checked="" 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?	<input checked="" type="checkbox"/>	N	Spray down and then placement of tarps when windy.
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/>	N	Yes, but their sweeper is broken and it has been approximately 2-3 weeks since sweeping has taken place. Ms. Reyna stated that the sweeper will be fixed in the next few days.

## 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?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/>	N	Manufacturer's recommended maintenance schedule to be followed for all equipment.
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"/>	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"/>	N	Ms. Reyna stated that she has placed labels on containers, however; many have fallen off. She stated they will be re-labeled as soon as possible.
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/>	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/>	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?	<input checked="" type="checkbox"/>	N	Ms. Reyna is the only employee that has been trained in the cause, detection and response to spills at this time. This is the result of employee turnover.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/>	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	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	<input checked="" type="checkbox"/>	N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	<input checked="" type="checkbox"/>	N	
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	The manager goes around facility once a day to ensure no waste, garbage or floatable debris is discharged from the facility.
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?	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### **Site Description:**

American Redi-Mix, LLC is a 2.1 acre concrete batch plant. There are dedicated areas for rock and sand storage piles, a rock washing area, cement silos (2), fueling area, acid dispensing for wash-out pits, wash-out area and admixture area. There is a rock lined detention area which is labeled as the only outfall at this site.

## 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	N		No routine facility inspections conducted.
Are inspections documented, including: <ul style="list-style-type: none"> <li>• Date and time</li> <li>• Name and signature of inspector</li> <li>• Weather information and a description of discharge occurring at the time of the inspection</li> <li>• Previously unidentified discharges from site</li> <li>• Control measures needing maintenance or repairs</li> <li>• Failed control measures that need replacement</li> <li>• Incidents of noncompliance observed</li> <li>• Additional control measures needed.</li> </ul>	Y	N		
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>• Inactive and unstaffed sites</li> </ul>	Y	N		
<b>Quarterly Visual Assessment</b>				
Are quarterly visual assessments conducted?	<input checked="" type="checkbox"/>	N		
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>	<input checked="" type="checkbox"/>	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>	<input checked="" type="checkbox"/>	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>			Not done yet. EPA approval in October 2010.
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	N	
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	N	
Cover all areas of the facility?	Y	N	
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<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	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	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?	<input checked="" type="checkbox"/>	N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	<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	N/A
<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	
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>			
Sampled once per year?	Y	N	
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>	<b>Notes:</b>		
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	Not yet.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	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	

## 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>SWPPP states, “efforts to minimize exposure will focus on waste, garbage, vehicle and equipment maintenance and industrial storage areas.”</p> <p>Industrial materials (except sand and gravel) will be maintained in closed containers onsite. Containers will be kept in good, clean condition maintaining their integrity.</p> <p>Sand and gravel piles will be moistened and tarped during wind events as well as any storm events. This will also prevent any dust generation from the stock piles.</p> <p>Vehicle and equipment parts will be stored outside covered, to prevent any pollutants from coming into contact with precipitation.</p> <p>Weekly clean-up of garbage will be conducted. Sweeping done on a regular basis.</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>Sweeping previously done on a daily basis prior to sweeper being out of service.</p> <p>Sand and gravel piles are tarped during wind events.</p> <p>Barrels are labeled and kept covered.</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>Preventative maintenance done as per manufacturer's requirements.</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 been reported.</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>Retention pond on east side of property. Outfall 1.</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>All runoff is directed to the retention pond.</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>SWPPP Implementation</b>	
<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>The area has waste containers on site. Removal of garbage is done when the containers are full.</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>Sweeping previously done on a daily basis prior to sweeper being out of service. It has been approximately 2-3 weeks since this has been done.</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)*

Concrete wall provided on the west side of the property.

Concrete curbing on all other sides of property except drive-way.

Retention pond