NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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SUSANA MARTINEZ
Governor

JOHN SANCHEZ
Lieutenant Governor

F. DAVID MARTIN
Secretary

ROJ SOLOMON, PE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 1, 2011

Honorable Rudy Jaramillo, Mayor
City of Belen
100 South Main
Belen, NM 87002

Re: Storm Water Compliance Inspection, SIC 4952, NPDES Compliance Evaluation Inspection, NMR05H808, February 16, 2011

Dear Mayor Jaramillo:

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 Clean Waters 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 (Marcia Adams, USEPA (6EN-WC), 1445 Ross Avenue; Dallas, TX 75202) and NMED (at the above address) regarding modifications and compliance schedules.

The NPDES Storm Water Multi-Sector General Permit for Industrial Activities (MSGP) was re-issued effective September 29, 2008 (see **Federal Register/Vol. 73, No. 189/Monday, September 29, 2008** pg. 56572). For questions regarding permitting please see: http://cfpub.epa.gov/npdes/stormwater/msgp.

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 Adams, USEPA (6EN-AS) via e-mail
Samuel Tates, USEPA (6SF) via e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail
Diana McDonald, USEPA (6EN-WM) via e-mail
District I Office, via e-mail

EPA

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
N	5NMR05H8088	110216	~	S	2

Remarks: TREATMENT WORK S

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
	2	N	N	

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
City of Belen WWTP – I-25 South to Main street, Left on Vivian to Conservency Road, Right to WWTP	**1230 hours / 02-16-2011**	**September 29, 2008**
	Exit Time/Date: **1430 hours / 02-16-2011**	Permit Expiration Date: **September 29, 2013**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Dale Tafoya, Wastewater Director (505) 966-2580

Other Facility Data
SIC 4952 SECTOR T

Name, Address of Responsible Official/Title/Phone and Fax Number
HONORABLE RUDY JARAMILLO, MAYOR
100 SOUTH MAIN ST.
BELEN, NM 87002
(505) 966-2733

Contacted: Yes [ ] No [*]

36°38'33.75"
106°46'35.15"

Section C: Areas Evaluated During Inspection

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

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prévention
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)

PLEASE SEE CHECKLIST FOR FURTHER EXPLANATIONS

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sandra Gabaldón ***/s/ Sandra Gabaldón***	**NMED/SWQB/505-827-1041**	**March 1, 2011**
Signature of Management QA Reviewer **Richard E. Powell**	**Agency/Office/Phone and Fax Numbers** **NMED/SWQB/505-827-2798/827-0160**	**Date** **March 1, 2011**

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information		General	
Inspection Type	Compliance Evaluation	Inspector Name	Sandra Gabaldón
NPDES ID Number	NMR05H808	Telephone	505-827-1041
Inspection Date	February 16, 2011	Entry Time	1230 hours
Inspector Type *(circle one)*	EPA [State] EPA Oversight	Exit Time	1430 hours
Facility Sector/ SIC/Activity Code	Sector T SIC4952	Signature	

Facility Location Information				
Name/Location/ Mailing Address	City of Belen WWTP 1300 Conservancy Road Belen, NM 87002			
GPS Coordinates	Latitude	34°38'33.75"	Longitude	106°46'35.15"
Receiving Water(s)	Bosque Drain in NMAC 20.6.4.105 of Rio Grande Basin			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Mr. Rudy Jaramillo, Mayor	(505) 966-2733
Facility Contact	Dale Tafoya, Wastewater Director	(505) 966-2580
Authorized Official(s)	Mr. Rudy Jaramillo, Mayor	(505) 966-2733

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	[Y]	N	SWPPP Prepared & Available	[Y]	N
Permit Type	[General]	Individual	SWPPP Contents Satisfactory	Y	[N]
Operational Date			SWPPP Implementation Satisfactory	Y	[N]
NOI/Application Date	01/20/11		SWPPP Date	11/2010	
If applicable, is no exposure certification on file?	Y	N	*Intentionally left blank*		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General			**Notes:**
Was the SWPPP completed prior to NOI submission?	[Y]	N	SWPPP – 01/20/11 NOI – 11/2010
Copy of the NOI and acknowledgment letter from EPA?	Y	[N]	No NOI. No acknowledgment letter.
Copy of the permit language?	[Y]	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	[N]	No 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: • 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	[N]	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	[N]	No documentation to support Criterion A for Endangered Species Act eligibility.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	[N]	No documentation provided
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	Y	[N]	Signatory requirements under Appendix B.11.A were not met. The NOI and SWPPP were both signed by Dale Tafoya, Wastewater Director. No letter duly authorizing Mr. Tafoya was found in the SWPPP document.
Is the storm water pollution prevention team identified (name or title)?	[Y]	N	
Are the storm water pollution prevention team's responsibilities identified?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	[Y]	N	Activated sludge wastewater Treatment Plant; Sludge handling; Equipment operations and equipment/vehicle maintenance/storage.
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?	Y	[N]	No receiving waters labeled on General Location Map
Is there a site specific site map?	[Y]	N	
Does the site map contain the size of the property in acres?	[Y]	N	6.90 Acres
Does the site map contain the location and extent of significant structures and impervious surfaces?	Y	[N]	The site map located in Appendix B of the SWPPP did not have significant structures. The site map provided was a schematic of the treatment plant.
Does the site map contain directions of storm water flow (indicated by arrows)?	[Y]	N	
Does the site map contain locations of all existing structural control measures?	Y	[N]	Site map did not have exiting structural controls.
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	[N]	Bosque Drain not labeled.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	[N]	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	Y	[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 significant spills/leaks have occurred
Does the site map contain locations of all storm water monitoring points?	Y	[N]	SWPPP states that because of the flat topography of this facility, no discharges will ever occur.
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	[N]	SWPPP states that because of the flat topography of this facility, no discharges will ever occur.
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?	Y	[N]	Landscape watering not included on the site map

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the site map contain locations of the following activities where these activities are exposed to precipitation? • Fueling stations **N/A** • Vehicle and equipment maintenance and/or cleaning areas **NO** • Loading/unloading areas **NO** • Locations used for the treatment, storage or disposal of wastes **NO** • Liquid storage tanks **NO** • Processing and storage areas **NO** • 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 **NO** • Transfer areas for substances in bulk **NO** • Machinery **NO**	Y	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	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	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	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	Y	N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	SWPPP states that no releases of oil or hazardous substances in excess of reportable quantities have occurred.

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: • 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]	N	
Does salt storage occur at this facility?	Y	[N]	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	[N]	

Controls to Reduce Pollutants			Notes: PLEASE SEE SWPPP 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]	N	Structural controls listed in SWPPP include: storage & shop buildings; laboratory; entrance works; blower building; liquid stream process & solid stream process with closed drainage systems back to the sanitary sewer.
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	[N]	No discussion provided on the selection or design of control measures.
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]	N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	[Y]	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	[N]	Only states, “regular basis”.
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]	N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	[N]	Only states, “regular basis”.
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?	[Y]	N	SWPPP describes inspection and maintenance of all storage tanks and fueling areas.
Does the facility implement procedures for plainly labeling containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides,” etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	Y	[N]	Used oil is not plainly labeled in large barrels. There are smaller 5 gallon buckets of oil that are labeled. However, these are not in secondary containment and are open to storm events and possible spillage or leakage.
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]	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	[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	[N]	No documentation was found showing training of employees regarding spills or spill response.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	[Y]	N	No documentation included in the SWPPP.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	Y	N	Please see SWPPP notes
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	N	Please see SWPPP notes
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	N	
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	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	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	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	N	Dirt road before paved entrance - the paved road is cleaned when needed with a mechanical sweeper
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Further Explanations

The SWPPP states, "The Belen Wastewater Treatment Plant site is characterized by extremely flat topography. The contours of the site in relation to neighboring farm and undeveloped property form a bowl. Site observation suggests that there is no surface flow from stormwater that exits the plant in any significant amounts. Sediment trails are not apparent along the entire perimeter of the property. Stormwater infiltrates to groundwater rat this site. Nonetheless, possible erosion is inhibited by a large graveled area on the north side of the facility grounds. This landscaped area continues to allow infiltration of stormwater, as is the case with most of the rest of the facility grounds. There is limited area of paving for some driveways which is degraded but relatively impervious. There are no distinct outfall points on the property." However, during the site inspection, it is noted that a discharge point is located in the northwest corner of the property. Please see attached photographs (photos 2 & 3) of facility.

The site map in the SWPPP is a schematic of the WWTP. The site map does not have the equipment storage area, the parking areas, the maintenance area, the used oil storage area, or dumpsters, grit, screenings, etc.

Sector T requirements are not mentioned in the SWPPP.

The NOI for City of Belen was submitted by Dale Tafoya on 01/20/2011, no title was included on the NOI. Mr. Tafoya is the Wastewater Director for the City of Belen. The SWPPP contains no document defining the scope of the wastewater director authority.

MSGP Appendix B.11 states: All applications, including NOIs must be signed as follows:

> ***A. 3:*** *For a municipality, state, federal or other public agency: By either a principal executive officer or ranking elected official. For purposes of this Part, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrator of EPA).*

Mr. Tafoya does not appear to meet the signatory requirements needed to apply for a Multi-Sector General Permit.

NPDES Industrial Storm Water Checklist (MSGP)

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
General			**Notes:**
Routine Facility Inspections			**No inspections have been performed**.
Are routine facility inspections conducted at least quarterly while facility operating?	Y	N	
Are inspections documented, including: • 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	N	.
Exceptions, including (see 4.1.3): • Inactive and unstaffed sites	Y	N	N/A
Quarterly Visual Assessment			**No Inspections performed**
Are quarterly visual assessments conducted?	Y	N	
Does the assessment consist of a sample collected: • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container.	Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes.	Y	N	
Exceptions, including (see 4.2.3): • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites.	Y	N	
Comprehensive Site Inspections			**No comprehensive site inspections have been performed.**
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)

Inspections			
Include observations of the following: • Industrial materials, residue, or trash that may have or could come into contact with storm water • Leaks or spills from industrial equipment, drums, tanks, and other containers • Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site • Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas • Control measures needing replacement, maintenance, or repair • All storm water control measures observed.	Y	N	
Are inspections documented, including: • Date of inspection • Names and titles of personnel making the inspection • Findings from examination of areas of facility from Part 4.3.1 • All observations relating to implementation of control measures • Any required revisions to the SWPPP resulting from inspection • Any incidents of noncompliance identified OR certification that facility is in compliance with the permit • A statement signed in accordance with Appendix B, Subsection 11	Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
General			**Notes:**
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	N/A
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	N/A
Benchmark Monitoring			**N/A**
Does the monitoring consist of a sample collected: • 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	
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? • 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): • 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			**N/A**
Sampled once per year?	Y	N	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
Other Required Monitoring			**N/A**
• State or Tribal provisions • Discharges to impaired waters • Additional monitoring required by EPA.	Y	N	

Reporting (Part 7)			
General			**Notes:**
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	No analytical results
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	N	No annual inspection conducted.
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	*(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*) Many of the pollutants at this facility are under roof and not exposed to precipitation. The unloading and loading of dry sludge occurs in a paved area which is bermed. Maintenance is performed as needed and inspections are done to insure no leaks or spills occur.
Good Housekeeping	*(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)* Oil barrels are in secondary containment, but are not labeled.
Preventative maintenance	*(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)* Regular inspections will be conducted to identify any equipment that could potentially be a source of a leak or spill.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	*(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)* The SWPPP goes into great detail how the staff will be trained on recognizing and stopping any leaks or spills.
Erosion and Sediment Controls	*(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)* The SWPPP states, "possible erosion is inhibited by a large graveled area on the north side of the facility grounds. This landscaped area allows for continued infiltration of stormwater." No dissipation devices are seen.
Management of Runoff	*(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)* No diversion, infiltration, containment or reduction of stormwater runoff was considered at this facility. As stated in the SWPPP, "The average annual total precipitation for the city of Belen is approximately 7.5 inches…stormwater from this site does not flow from this site in any important amounts. For this facility, management of runoff becomes a moot consideration."
Salt Storage Piles	*(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)* N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	*(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)* Waste oil containers need attention. No waste, garbage or floatable debris was seen on site. One garbage dumpster is uncovered.
Evidence of non-storm water discharges	No evidence of non-storm water discharges observed.
Dust Generation and Vehicle Tracking of Industrial Materials	*(minimize generation of dust and off-site tracking of raw, final, or waste materials)* Mechanical sweeper used to prevent vehicle tracking of industrial materials when needed.

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)*

As stated above, this facility is said to be in a "bowl" with no discharge. There is berming on the north and south sides of the property. There is no discussion in the SWPPP with regard to selection, design, installation or implementation.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Sandra Gabaldon	Date: 02/16/2011	Time: 1345 hours
City/County: City of Belen / Valencia County		
Location: Belen Wastewater Treatment Facility		
Subject: Northwest corner of fence line of City of Belen WWTP.		

Photo # 2

Photographer: Sandra Gabaldón	Date: February 16, 2011	Time: 1345 Hours
City/County: City of Belen / Valencia County		
Location: Belen Wastewater Treatment Plant		
Subject: Near the entrance on the northwest corner of the property.		

NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Sandra Gabaldón	Date: February 16, 2011	Time: 1346 Hours
City/County: City of Belen / Valencia County		
Location: City of Belen WWTP		
Subject: The northwest corner of the property in which there is apparent sloping towards the Bosque drain which is a nexus to the Rio Grande		

NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Sandra Gabaldón	Date: February 16, 2011	Time: 1402 Hours
City/County: City of Belen / Valencia County		
Location: City of Belen WWTP		
Subject: Used oil containers on the ground without secondary containment, open, to any storm events that may occur.		

NMED/SWQB
Official Photograph Log
Photo # 5

Photographer: Sandra Gabaldón	Date: February 16, 2011	Time: 1403 Hours
City/County: City of Belen / Valencia County		
Location: City of Belen WWTP		
Subject: Another view taken from the administrative offices of the northwest corner of the property in relation to the Bosque drain