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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

December 2, 2015

Mr. Kenneth Garcia, Utilities Director
1700 North Grand Avenue
Las Vegas, NM 87701

Re: City of Las Vegas Wastewater Treatment Facility; Major; Multi-Sector General Permit; SIC 4952; NPDES Permit NMR05H827 (previous tracking number.) Listed as "pending" in ICIS; November 5, 2015

Dear Mr. Garcia:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at the above 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.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sandra Gabaldon at (505) 827-1041 or at sandra.gabaldon@state.nm.us.

Sincerely,

/s/ Bruce J. Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson (6EN-WC) by e-mail
Tung Tguyen, (6EN-WQ) by email
NMED District II by e-mail

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	The SWPPP was completed in 2010. However, it has not been updated to reflect the changes in the 2015 MSGP.
Copy of the NOI and acknowledgment letter from EPA?	Y	<input checked="" type="checkbox"/> N	There is a previous letter dated January 28, 2011 in the SWPPP acknowledging Notice of Intent. No current acknowledgement letter is available. The ICIS database states that the permit is currently "pending".
Copy of the permit language?	Y	<input checked="" type="checkbox"/> N	Federal Register, Monday, October 30, 2000 in SWPPP. There is no 2015 Multi-Sector General Permit in this SWPPP.
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	<input checked="" type="checkbox"/> N	There are no inspection reports in the SWPPP provided.
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 (3.1.1) · Quarterly visual assessment (3.2.3) · Benchmark monitoring (6.2.1.3).	Y	<input type="checkbox"/> N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	<input type="checkbox"/> N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/> N	There is no supporting documentation for the Endangered Species Act in the SWPPP
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	<input type="checkbox"/> N	N/A
Did all "operators" sign/certify the SWPPP?	Y	<input checked="" type="checkbox"/> N	There is a signature from the consultant, John Tellez, Molzen Corbin & Associates. No signatures found for the City of Las Vegas.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Are the storm water pollution prevention team's responsibilities identified?	Y	<input checked="" type="checkbox"/> N	The SWPPP provides a general pollution prevention team. Kenneth Garcia, Utility Director; Esteban Media, WW Manager; Robert Espinoza, Lab Tech Op.; Phillip Mares, Fire Chief. It does not provide responsibilities. States the "xx <i>Pollution Prevention Team Coordinator</i> ". Some of these individuals are no longer employed by the City.

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	General Location map provides an overview of the location of the facility and states the receiving water is the Gallinas River.
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/>	
Does the site map contain the location and extent of significant structures and impervious surfaces?	Y	<input checked="" type="checkbox"/>	There is a site drainage map (Fig. 3-2) that identifies the flow pattern; and there is a site map (Fig. 3-3) that is a schematic of the treatment plant that labels all the buildings, but does not indicate impervious surfaces.
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/>	N	Fig. 3-2 in SWPPP
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/>	N	Fig. 3-4, Existing BMPs, show a silt fence around the east side of the property. However, the site does not have a silt fence as indicated by Fig. 3-4
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	<input checked="" type="checkbox"/>	The site drainage map (Fig.3-2) indicates that all storm water drains to the Gallinas River. There is no indication if there is a TMDL or impairment on this segment. NMED has an approved TMDL for Temperature on this segment of the Gallinas River.
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 5.2.2?	Y	<input checked="" type="checkbox"/>	The SWPPP provides a table (4-1) with potential pollutant sources, but does not indicate specific pollutants (such as cleaning solvents, oil or chlorine).
Does the site map contain locations where significant spills or leaks identified under Part 5.2.3.3 have occurred?	<input checked="" type="checkbox"/>	N	SWPPP states no significant spills or leaks have occurred.
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/>	
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	<input checked="" type="checkbox"/>	
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	<input checked="" type="checkbox"/>	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
<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"> · 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 	Y	<input type="checkbox"/> N	
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	<input type="checkbox"/> N	
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	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?	<input type="checkbox"/> Y	N	SWPPP indicates that no spills and/or leaks have occurred in the last three years prior to the preparation of the document.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> · Date · Description of evaluation criteria · List of the outfalls or onsite drainage points directly observed · Different types of non-storm water discharges and source locations · Actions taken such as a list of control measures for elimination. 	Y	<input type="checkbox"/> N	The SWPPP does not provide documentation that the City of Las Vegas WWTP has evaluated for the presence of unauthorized non-stormwater discharges.
Does salt storage occur at this facility?	Y	N	N/A
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	<input checked="" type="checkbox"/> Y	N	No sampling data is available, according to the SWPPP.
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/> Y	N	SWPPP states that a silt fence will be placed along the eastern border. However, there is no silt fence there
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	Y	<input type="checkbox"/> N	The SWPPP does not document the selection and the design of control measures were based on sound practices and procedures in Part 2.1.1.
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	Y	<input type="checkbox"/> N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	Y	<input type="checkbox"/> N	The SWPPP does not address any sweeping, labeling or appropriate storage containers as required by the Permit.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants		Notes:	
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<input type="checkbox"/> N	There is no discussion regarding schedules for pickup and disposal of wastes or any routine inspections of tanks and/or drums. The facility does have trash dumpsters on site that are regularly picked up, but they remain open to the precipitation.
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	Y	<input type="checkbox"/> N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input type="checkbox"/> N	No schedule provided
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	<input type="checkbox"/> N	The SWPPP states that small leaks will be identified and handled by the Wastewater Manager with absorbent material. Any large leaks will be addressed by the Fire Department. There are no procedures included for "minimizing" potential leaks.
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	<input type="checkbox"/> 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	The SWPPP states that training will be provided, but there is no documentation to support any training involving employees or the pollution prevention team.
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	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	<input type="checkbox"/> N	The SWPPP states that any significant spill/leak will be reported to the local Fire Department. It does not mention reporting a significant hazardous spill to the National Response Center (800) 424-8802.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	Y	<input type="checkbox"/> N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	Y	<input type="checkbox"/> N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	<input type="checkbox"/> N	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	Y	<input type="checkbox"/> N	SWPPP states annual training will be provided. There is no documentation supporting training has been done since the creation of the SWPPP.
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	SWPPP states training will be provided on the contents of the SWPPP and good housekeeping measures. There is no mention of <i>control measures, monitoring, inspections and documentation</i> . The MSGP specifies the types of personnel and the tasks they perform that must be trained so that they understand the requirements and their specific responsibilities, including those mentioned above.
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	Not addressed in SWPPP.
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	<input type="checkbox"/> N	Not addressed in SWPPP.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	<input type="checkbox"/> N	SWPPP states non-stormwater discharges will be evaluated annually. There is no documentation provided in SWPPP that states this has been completed.

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

The permitted facility is a Major Wastewater Treatment Plant that has two (2) aeration basins, two (2) secondary clarifiers, ultraviolet disinfection, digesters, inactive drying beds, inactive primary clarifiers, as well as other buildings on-site (laboratory, maintenance, administrative). It is approximately 5.30 acres, 2.54 are impervious surfaces.

The site map shows a silt fence along the east perimeter of the 5.30 acres. However, this is no longer existent. There is a berm along this area, but it needs maintenance on it to insure no stormwater leaves the site.

The receiving water is the Gallinas River, in the Pecos River Basin, NMAC Segment 20.6.4.220.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
Routine Facility Inspections			No Site Inspections were provided with the SWPPP.
Are routine facility inspections conducted at least quarterly while facility operating?	Y	<input checked="" type="checkbox"/> N	
Are inspections documented, including: <ul style="list-style-type: none"> · Date and time · Name and signature of inspector · Weather information and a description of discharge occurring at the time of the inspection · Previously unidentified discharges from site · Control measures needing maintenance or repairs · Failed control measures that need replacement · Incidents of noncompliance observed · Additional control measures needed. 	Y	<input checked="" type="checkbox"/> N	
Exceptions, including (see 3.1.1): <ul style="list-style-type: none"> · Inactive and unstaffed sites 	Y	N	N/A
Quarterly Visual Assessment			No Visual Inspections were provided with the SWPPP. Rain events that may have resulted in a discharge were reviewed for the last three months (Sept. – November, 2015). These include: 9/9/15 – 0.30"; 10/03/15 – 0.56"; 10/20/15 – 0.75"; 10/21/15 – 1.47"; 10/30/15 – 0.71".
Are quarterly visual assessments conducted?	Y	<input checked="" type="checkbox"/> N	
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> · Within the first 30 minutes of discharge · On discharges that occur at least 72 hours (3 days) from the previous discharge · Collected in a clean, clear glass or plastic container. 	Y	<input checked="" type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: <ul style="list-style-type: none"> · Sample location · Sample collection date/time & visual assessment date/time · Personnel collecting sample & performing assessment and their signature · Nature of the discharge (runoff or snowmelt) · Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) · Probable sources of contamination · If applicable, reason for not taking samples within 1st 30 minutes. 	Y	<input checked="" type="checkbox"/>	No assessments documented
Exceptions, including (see 3.2.3): <ul style="list-style-type: none"> · Adverse weather conditions · Climates with irregular storm water runoff · Areas subject to snow · Substantially identical outfalls (per 5.2.5.3) · Inactive and unstaffed sites. 	Y	<input checked="" type="checkbox"/>	The SWPPP does not address any of the exceptions in Part 3.2.3 of the permit.

Monitoring (Part 6)			
<u>General</u>	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	<input checked="" type="checkbox"/>	Part 9 of the permit specifies the requirements of the State of New Mexico.
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	N/A
Benchmark Monitoring			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> · Within the first 30 minutes of discharge · On discharges that occur at least 72 hours (3 days) from the previous discharge 	Y	N	N/A - There are no Benchmark Monitoring Requirements for Sector T.

NPDES Industrial Storm Water Checklist (MSGP)

<ul style="list-style-type: none"> · Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall · Prior to commingling. 			
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	N/A
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> · Make the necessary modifications · Continue quarterly monitoring · Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA · Natural background pollutant level documentation 	Y	N	N/A
Exceptions, including (see 6.1.5, 6.1.6 & 6.2.1.3): <ul style="list-style-type: none"> · Adverse weather conditions · Climates with irregular storm water runoff · Snowmelt · Substantially identical outfalls (per 5.1.5.2) · Inactive and unstaffed sites. 	Y	N	N/A
Effluent Limitations Monitoring (Sector A, C, D, E, J, K, L, O, S)			N/A
Sampled once per year?	Y	N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.2.2.3)?	Y	N	N/A
Water Quality Based Effluent Limitations			Notes: TMDL approved in 2013 by EPA
Does the facility discharge to water quality impaired waters?	<input checked="" type="checkbox"/>	N	
If TMDL exists, does the facility need to monitor?	<input checked="" type="checkbox"/>	N	TMDL for bacteria
Is the facility monitoring all 303(d) pollutants in the first surface water to which they discharge?	Y	<input checked="" type="checkbox"/>	
Does the facility discharge to a CERCLA site?	Y	<input checked="" type="checkbox"/>	
Additional monitoring required by EPA?	Y	<input checked="" type="checkbox"/>	

NPDES Industrial Storm Water Checklist (MSGP)

Reporting (Part 7) Information must be submitted using NeT for NOI, NEC, NOT and Annual Report.			<u>DMRs must be submitted using NetDMR</u>	
<u>General</u>			Notes:	
Is facility a new discharger or new source to water quality impaired waters? Has the facility submitted this information to EPA Region 6?	Y	<input checked="" type="checkbox"/> N		
If there was a facility exceedance under numeric effluent limitations, was a report submitted to EPA within 30 days?	Y	N	N/A	
Did the facility submit benchmark or ELG monitoring through NetDMR?	Y	N	N/A	
Did the facility submit Annual Reports to EPA through NeT? (Due January 30 of each year)	Y	<input checked="" type="checkbox"/> N		
If follow up monitoring per 6.2.2.3 exceeds a numeric limit, did the facility submit an Exceedance Report (paper) to EPA Region 6 in addition to reporting the monitoring data through NetDMR?	Y	N	N/A	

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<p>Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff</p>	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>Berm on the east side of property. Curbs along impervious surfaces.</p>
<p>Good Housekeeping</p>	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>None</p>
<p>Preventative maintenance</p>	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>None</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>None</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Flow velocity dissipation is achieved at one outfall (SE corner) – retention pond</p>
Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>No stormwater runoff management practices are noted.</p>
Salt Storage Piles	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>N/A</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>There is a large trash bin near the headworks of the facility which collects the grit. It is not kept closed. There are other trash bins located throughout the facility, which are not kept closed.</p>
Evidence of non-storm water discharges	<p>None.</p>
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Vehicle tracking is minimized by impervious surfaces.</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)*

Curbing is maintained along the access roads. There is berming along the east side of the property, but this is poorly maintained. There is also a small retention pond prior to discharge on the southeast corner of the property which is overgrown with vegetation.

The additional requirements for Sector T are not addressed in the SWPPP. See Part 8.T.5 of the 2015 MSGP.