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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 14, 2016

Mr. Mike Brearley, Project Manager
Chevron Mining, Inc., McKinley Mine
6101 Bollinger Canyon Road
San Ramon, CA 94583

Re: Industrial Storm Water; SIC 1221; NPDES Compliance Evaluation Inspection; Chevron Environmental Management Company, McKinley Mine, NMU001907, February 17, 2016

Dear Mr. Brearley,

Enclosed please find a copy of the report and check list 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.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

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:

Gladys Gooden-Jackson
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
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 Sarah Holcomb at 505-827-2798 or at sarah.holcomb@state.nm.us.

Sincerely,

/s/ Bruce Yurdin

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

cc: Allan Austin, Site Manager, CMI McKinley Mine, PO Box 4590, Gallup, NM 87305
Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WM) by e-mail
Raquel Douglas, USEPA (6EN-WC) by e-mail
Everett Spencer, USEPA (6EN-WM) by e-mail
NMED District 1, William Chavez by e-mail
Ronnie Ben, Navajo Nation EPA, by e-mail
Patrick Antonio, Navajo Nation EPA, by e-mail
Steve Linse, Senior Hydrologist, TriHydro, by e-mail
Cameron Twing, Civil Engineer, TriHydro, by e-mail



NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M U 0 0 1 9 0 7 11 12 1 6 0 2 1 7 17 18 C 19 S 20 2					
Remarks					
B I T U M I N O U S C O A L M I N E					
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) CMI McKinley Mine, Gallup, McKinley County, NM: From Albuquerque, drive 194 miles to exit 20 in Gallup. Turn north on US-491. The road will come to a Y after 7.2 miles – keep left to continue on NM-264. Travel 14.6 miles and turn right on P&M Road (where the Navajo Nation Maintenance building is located), and travel 1.8 miles	Entry Time /Date 0830 / 2-17-16	Permit Effective Date 6-4-2015
	Exit Time/Date 0320 / 2-17-16	Permit Expiration Date 6-4-2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Steve Linse, TriHydro (307) 745-7474 Alan Austin, CEMC Zac Bitsuie, TriHydro	Other Facility Data SIC: 1221	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Mark Brearley, CEMC Project Manager (925) 790-6958 6101 Bollinger Canyon Road San Ramon, CA 94583	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	N	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)

- The inspector made introductions, presented her credentials and explained the purpose of the inspection in an entrance interview with Mr. Steve Linse of TriHydro, Mr. Zac Bitsuie of TriHydro, and Mr. Allan Austin of Chevron Environmental Management Company (CEMC). Mr. Ronnie Ben and Mr. Patrick Antonio of the Navajo Nation EPA were also in attendance. Due to also conducting the facility's individual permit inspection at the same time, the inspector reviewed the SWPPP in office at a later date. Preliminary findings were discussed in an exit interview with the same staff mentioned above on the day of the inspection. Additional information was obtained from TriHydro representatives the week of February 29 via email and phone.
- Please see report for further information.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-827-2798	Date 3-14-16
Signature of Management QA Reviewer Bruce Yurdin /s/ Bruce Yurdin	Agency/Office/Phone and Fax Numbers 505-827-2795	Date 3-14-16

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information			General	
Inspection Type	CEI		Inspector Name	Sarah Holcomb
NPDES ID Number	NMU001907		Telephone	505-827-2798
Inspection Date	2-17-16		Entry Time	0830 hours
Inspector Type <i>(circle one)</i>	EPA	<input type="checkbox"/> State	Exit Time	1520 hours
Facility Sector/ SIC/Activity Code	Sector H.1, SIC 1221		Signature	/s/ Sarah Holcomb

Facility Location Information				
Name/Location/ Mailing Address	CMI McKinley Mine, Gallup, McKinley County, NM: PO Box 4590, Gallup, NM 87305			
GPS Coordinates	Latitude	N. 36.36326	Longitude	W. -108.9838
Receiving Water(s)	Defiance Draw and unnamed tributaries to Defiance Draw in 20.6.4.97 NMAC, Tse Bonita Wash in 20.6.4.98 NMAC, thence to the Rio Puerco in 20.6.4.99 NMAC.			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Chevron Environmental Management Company	
Facility Contact	Mr. Steve Linse, TriHydro	307-745-7474
Authorized Official(s)	Mr. Mark Brearley, CEMC	925-790-6958

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	Y	<input type="checkbox"/> N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	N
Permit Type	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory	<input checked="" type="checkbox"/> Y	N
Operational Date	1961		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	N
NOI/Application Date	N/A		SWPPP Date	9-2-2015	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	However, the only acknowledgement included in the SWPPP was the coverage for the Arizona lands, not the New Mexico lands. (AZR051309). Permit coverage was obtained under the previous 2000 MSGP with tracking number NMR00A237, but no coverage is evident under the 2008 permit.
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"> • Routine facility inspection (3.1.1) • Quarterly visual assessment (3.2.3) • 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?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/>	N	Mark Brearley signed on 9-29-2015.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			<u>Notes:</u>
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/>	N	Reclamation maintenance activities. Active mining ceased in 2009.
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?	Y	<input checked="" type="checkbox"/>	
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)?	Y	<input checked="" type="checkbox"/>	
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	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/>	N	TriHydro representatives indicate that they will review conveyance structures to ensure that everything is accurately depicted on the site map.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.2.2?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.2.3.3 have occurred?	Y	N	N/A – SWPPP states no spills or leaks have occurred in the past three years.
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	
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	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			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 checked="" type="checkbox"/> N	Site map doesn't identify North Facility areas where fueling and other maintenance activities take place, even though that area is not covered under this permit.
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	N/A
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"/> Y	N	On site roadway travel in light to mid-weight vehicles. Heavy equipment for maintenance activities. Refueling of heavy equipment.
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"/> Y	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	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"/> Y	N	

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: <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. 	<input checked="" type="checkbox"/>	N	
Does salt storage occur at this facility?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input checked="" type="checkbox"/>	SWPPP states that there is no previous data although there was permit coverage under previous permits.
Controls to Reduce Pollutants		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"/>	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?	Y	N	N/A – no coal mining/industrial activities are occurring on lands covered by this MSGP.
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	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	N	N/A – no tanks and drums are stored on site.
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	Preventative measures are conducted through inspection of vehicles for maintenance issues.
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/>	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	These procedures are implemented at the North Facilities, which is where the maintenance activities occur. The North Facilities are not covered under this SWPPP/MSGP.
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	
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)

Controls to Reduce Pollutants		Notes:	
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	Vegetation within reclamation areas is taking well.
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	
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	Other discharges from the facility are covered under NPDES permit NN0029836.

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

The CMI McKinley Mine is a bituminous coal mine that started operations in 1961. The last delivery of coal mined from the facility occurred in 2010, and the mine has been in reclamation ever since. The reclamation activities at the mine are covered under NPDES permit number NN0029386, issued by EPA Region 9, even though some lands are in New Mexico (EPA Region 6). The facility representatives onsite at the time of this inspection were from TriHydro, the consultant working on behalf of CMI/CEMC.

The MSGP coverage for the McKinley Mine facility was obtained by September 2, 2015, but only was applicable to the Arizona/Navajo Nation lands under tracking number AZR05I309. CMI/CEMC did not obtain permit coverage for the discharges onto State of New Mexico lands in accordance with the MSGP. It did not appear from a review of EPA and/or NMED's records that CMI had obtained permit coverage under the 2008 MSGP, but a tracking number under the 2000 MSGP was provided (NMR00A237).

The industrial areas covered by this SWPPP are mainly the haul/access roads that have not yet been remediated, and the office area at the entrance to the mine. No runoff has yet occurred in order to collect samples since coverage was obtained under the AZR tracking number.

A previous contractor had overseen the mine during the 2000 and 2008 MSGP permit terms for CMI, and TriHydro was unable to produce sampling data for those previous permit terms.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)		
<u>General</u>	Notes:	
Routine Facility Inspections		
Are routine facility inspections conducted at least quarterly while facility operating?	Y	N
TriHydro indicated that due to the NOI being approved in October 2015, the first quarter inspection was due in Q1 of 2016. Thus no inspections were required yet as of the date of this inspection.		
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	N
Exceptions, including (see 3.1.1): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	N
Quarterly Visual Assessment		
The permittee had not yet had an opportunity to collect and assess a visual stormwater sample (NOI was just approved in October 2015).		
Are quarterly visual assessments conducted?	Y	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	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	N
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	N

Monitoring (Part 6)		
<u>General</u>	Notes:	
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input checked="" type="checkbox"/> Y	N
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)?	Y	N
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N
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

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:
Does the facility discharge to water quality impaired waters?	Y	<input checked="" type="checkbox"/>	
If TMDL exists, does the facility need to monitor?	Y	N	N/A
Is the facility monitoring all 303(d) pollutants in the first surface water to which they discharge?	Y	N	N/A
Does the facility discharge to a CERCLA site?	Y	<input checked="" type="checkbox"/>	
Additional monitoring required by EPA?	Y	N	N/A

NPDES Industrial Storm Water Worksheet (Construction)

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	N	N/A	
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 Worksheet (Construction)

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>Because this is a mine in reclamation, the only industrial activities currently exposed to stormwater are haul/access roads. Inspectors monitor the roads for signs of erosion and keep an eye on maintenance issues.</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>No materials are stored on site.</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>Facility representatives state that vehicle checks are conducted to ensure that there are no leaks of fuel or oils that could be exposed to stormwater. Routine inspections are conducted to monitor erosion in areas covered by the MSGP.</p>

SWPPP Implementation	
<p>Spill Prevention and Response</p>	<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 materials are stored on-site and fueling of heavy equipment is conducted via a mobile fueling unit.</p>
<p>Erosion and Sediment Controls</p>	<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 devices (i.e. riprap) are located at outfalls. Existing vegetation is also used to slow down flow.</p>

NPDES Industrial Storm Water Worksheet (Construction)

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>Other than the use of existing vegetation, there did not appear to be an attempt to prevent flow from leaving the facility.</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>

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>Any waste or floatable debris observed on site is collected and disposed of weekly.</p>
Evidence of non-storm water discharges	<p>No evidence of non-stormwater discharges were observed on the date of this inspection.</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>Vehicles are encouraged to drive slowly and not generate more dust than needed.</p>