



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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DAVE MARTIN  
Secretary  
RAJ SOLOMON, P.E.  
Deputy Secretary

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**Certified Mail - Return Receipt Requested**

May 5, 2011

Mr. Ben R. Trujillo, Airport Manager  
Four Corners Regional Airport  
800 Municipal Drive  
Farmington, New Mexico 87401

**RE: Industrial; Storm Water; SIC 4581; NPDES Compliance Evaluation Inspection; Four Corners Regional Airport; NMR05GC99; April 20, 2011**

Dear Mr. Trujillo:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report; and required to correct any problems noted during the inspection and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both USEPA and NMED 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.cfm>

My thanks for your assistance and cooperation during the inspection. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 827-2798.

Sincerely,

*/s/ RICHARD E. POWELL*

Richard E. Powell  
Surface Water Quality Bureau

CC: Samuel Tate, USEPA (6EN-AS) by email  
Carol Peters-Wagnon, USEPA (6EN-WM) by email  
Marcia Gail Adams, USEPA (6EN-AS) by email  
Diana McDonald, USEPA (6EN-WM) by email  
NMED, District I Albuquerque by email  
Mr. Rob Mayes, City Manager, City of Farmington by email



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

**NPDES Compliance Inspection Report**

**Section A: National Data System Coding**

Transaction Code			NPDES										yr/mo/day			Inspec. Type		Inspector		Fac Type																					
1	N	2	5	3	N	M	R	0	5	G	C	9	9	11	12	1	1	0	4	2	0	17	18	~	19	S	20	2													
Remarks																																									
A						I						R						P						O						R						T					
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) FOUR CORNERS REGIONAL AIRPORT - WEST SIDE OF FARMINGTON, 1396 WEST NAVAJO STREET SAN JUAN COUNTY		Entry Time /Date 0825/4-20-11	Permit Effective Date 9-29-08
		Exit Time/Date 1440/4-20-11	Permit Expiration Date 9-29-13
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) BEN R. TRUJILLO, AIRPORT MANAGER (505) 599-1462, CELL (505) 320-0211 LYLE PRUITT, AIRPORT OPERATIONS & MAINTENANCE (505) 599-1396		Other Facility Data LAT 36 44 19.5 LONG -108 13 39.8 SIC 4581	
Name, Address of Responsible Official/Title/Phone and Fax Number BEN R. TRUJILLO, AIRPORT MANAGER, CITY OF FARMINGTON, FOUR CORNERS REGIONAL AIRPORT, 800 MUNICIPAL DRIVE, FARMINGTON, NM 87401		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

**Section C: Areas Evaluated During Inspection**

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

M	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

**Section D: Summary of Findings/Comments (Attach additional sheets if necessary)**

- FACILITY HAS APPLIED FOR AND RECEIVED REQUIRED NPDES PERMIT COVERAGE AND HAS PREPARED AND IMPLEMENTED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP). HOWEVER, NOI WAS SIGNED BY RODNEY HUNT, DIRECTOR GENERAL SERVICES. IT IS UNCLEAR THAT MR. HUNT HAS NPDES PERMIT SIGNATORY AUTHORITY FOR THE CITY OF FARMINGTON.
- AN EXIT INTERVIEW TO DISCUSS THE PRELIMINARY FINDINGS OF THIS INSPECTION WAS CONDUCTED WITH MESSRS. TRUJILLO & PRUITT FROM APPROXIMATELY 1425 - 1440 HOURS ON APRIL 20, 2011 AT THE SITE.
- AIRPORT HAS SEVERAL TENANTS THAT MAY REQUIRE NPDES MSGP PERMIT COVERAGE. INSPECTIONS OF THESE TENENTS WERE NOT CONDUCTED ON THIS DATE BUT NAMES AND CONTACTS ARE LISTED IN THIS REPORT. SEE NOTES ON SWPPP REVIEW.
- SEE REPORT AND FURTHER EXPLANATIONS.

/s/ RICHARD E. POWELL	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2798	Date 5-5-11
Signature of Management QA Reviewer /s/ GLENNE E. SAUMS	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2827	Date 5-5-11

## NPDES Industrial Storm Water Checklist (MSGP)

National Database Information			General	
Inspection Type	Compliance Evaluation		Inspector Name	Richard E. Powell
NPDES ID Number	NMR05GC99		Telephone	(505) 827-2798
Inspection Date	4/20/2011		Entry Time	0825/4-20-11
Inspector Type <i>(circle one)</i>	EPA	State	Exit Time	1440/4-20-11
Facility Sector/ SIC/Activity Code	S1/4581		Signature	<i>/s/ RICHARD E. POWELL</i>

Facility Location Information				
Name/Location/ Mailing Address	City of Farmington Four Corners Regional Airport, 1396 West Navajo Street, Farmington, NM			
GPS Coordinates	Latitude	36 44 19.5	Longitude	-108 13 39.8
Receiving Water(s)	Farmington MS4 (small NPDES regulated MS4); thence to the San Juan River in Segment 20.6.4.401 NMAC of the San Juan Basin			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	City of Farmington Four Corners Regional Airport	
Facility Contact	Ben R. Trujillo, Airport Manager Lyle Pruitt, Airport Operations & Maintenance	505-599-1462 505-599-1396
Authorized Official(s)	Rodney Hunt, Director General Services (signed NOI)	505-599-1379

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	N
Permit Type	General	Individual	SWPPP Contents Satisfactory	Y	<input type="checkbox"/> N
Operational Date	1940's		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	1-5-2009		SWPPP Date	12-2008	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	December 2008 plan was updated on 4-7-2009.
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	
Copy of the permit language?	<input checked="" type="checkbox"/>	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	<input checked="" type="checkbox"/>	Missing visual assessments, tenant SWPPPs, etc.
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> <li>• Routine facility inspection (4.1.3)</li> <li>• Quarterly visual assessment (4.2.3)</li> <li>• Benchmark monitoring (6.2.1.3).</li> </ul>	Y	N	NA
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	<input checked="" type="checkbox"/>	Some activities, such as spill response, addressed in the FAA Airport Certification Plan not referenced in the SWPPP.
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	NOI says Criterion A. However, to be eligible under Criterion A, no federally-listed threatened or endangered species or their designated critical habitat are likely to occur in the "action area" as defined in Appendix A. Several federally listed endangered species are known to occur in the San Juan River.
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	NA
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/>	N	But signed by Rod Hunt, Director General Services who may not be eligible to sign documents lacking formal authorization by a responsible official.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	May need to update.
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	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"/> Y	N	
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/> N	100 acres listed in SWPPP.
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	Y	<input checked="" type="checkbox"/> N	
Does the site map contain locations of all existing structural control measures?	Y	<input checked="" type="checkbox"/> N	14 onsite storm water collection ponds are not labeled or labeled as inlets. It is unclear that these actually function as storm water pollutant 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	<input checked="" type="checkbox"/> N	On general location map.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/> N	Storm drainage mostly via underground piping not marked on map.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	None reported.
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/> Y	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?	Y	<input checked="" type="checkbox"/> N	Three additional outfalls not on the map were observed during the inspection. There may be others.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	NA

## 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"> <li>• Fueling stations <b>N</b></li> <li>• Vehicle and equipment maintenance and/or cleaning areas <b>N</b></li> <li>• Loading/unloading areas <b>Y</b></li> <li>• Locations used for the treatment, storage or disposal of wastes <b>NA</b></li> <li>• Liquid storage tanks <b>Y</b></li> <li>• Processing and storage areas <b>Y</b></li> <li>• Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility <b>Y</b></li> <li>• Transfer areas for substances in bulk <b>Y</b></li> <li>• Machinery <b>Y</b></li> </ul>	Y	<input type="checkbox"/> N	Fueling done in various locations along terminal ramp.
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	No significant sources.
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	No non-storm water discharges documented.
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	Airport SWPPP mainly addresses activities such as deicing and fueling. SWPPP Table 3 lists detail about other activities and pollutant sources conducted by tenants such as maintenance, storage, etc. SWPPP does not address road/utilities debris storage area.
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	Y	<input type="checkbox"/> N	Propylene glycol and fuel, pollutants from road/utilities debris storage area onsite but operated by other City of Farmington departments. Pollutants for tenant activities are listed in Table 3.
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	No larger spills documented. Facility should keep a log of all spills except in incidental amounts.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Site Description</b>		<b>Notes:</b>	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> <li>• Date</li> <li>• Description of evaluation criteria</li> <li>• List of the outfalls or onsite drainage points directly observed</li> <li>• Different types of non-storm water discharges and source locations</li> <li>• Actions taken such as a list of control measures for elimination.</li> </ul>	Y	<input type="checkbox"/> N	None documented but may be evaluated during quarterly inspections.
Does salt storage occur at this facility?	Y	<input type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	NA – none required.
<b>Controls to Reduce Pollutants</b>		<b>Notes:</b>	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/> Y	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?	Y	<input type="checkbox"/> N	Not obviously, but controls in many cases appear to utilize these practices.
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/> 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)?	<input checked="" type="checkbox"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<input type="checkbox"/> N	No schedule in SWPPP. Trash pick-up done twice/week.
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	Not in airport SWPPP. These may be specified by the tenants but tenant specific controls are not incorporated.
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input type="checkbox"/> N	Not in airport SWPPP. These may be specified by the tenants but tenant specific controls are not incorporated.
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	Some activities, such as spill response, addressed in the FAA Airport Certification Plan but are not addressed or referenced in the SWPPP. This plan does not address small containers. SWPPP just says these must be plainly labeled.
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	Yes per above plan but tenant procedures are not addressed.
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	Yes per above plan but tenant procedures are not addressed.
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	Y	<input type="checkbox"/> N	Yes per above plan but tenant procedures are not addressed.
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	Have done SWPPP training and according to the facility's representative, response procedures are addressed, but this is not documented in the training records.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/> Y	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 checked="" type="checkbox"/> N	Yes except for construction debris storage area operated by other city departments.
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 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	NA
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/> Y	N	But may not include storm water issues.
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 checked="" type="checkbox"/> N	Facility intends to revise their annual training program to include required storm water related training.
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 checked="" type="checkbox"/> N	Yes except for construction debris storage area operated by other city departments.
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	N	No non-storm water discharges documented.

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### **Site Description:**

The City of Farmington (the airport authority) owns and operates Four Corners Regional Airport (FCRA) and engages in various activities such as aircraft deicing, airport terminal services and aircraft storage, airport hanger rental, airport leasing, etc. but does no aircraft or ground vehicle maintenance, or fueling. Many of the equipment fueling, maintenance and material storage activities at the airport are directly under the control of several airport tenants with some oversight by airport management personnel. According to EPA's NOI database, none of the potentially regulated tenants currently have permit coverage nor are there SWPPPs prepared and incorporated into the airport master SWPPP. According to the airport representative, there are at least six unpermitted tenants on-site that conduct fueling, maintenance, and other servicing and repair activities. These include:

Bisti Aviation (Don Sitta, Owner)  
Atlantic Aviation (Rick Wielebsky, General Manager)  
San Juan Regional Air Care (Richard Berve, Air Care Manager)  
Dugan Production (Tony Dugan, Owner)  
Great Lakes Aviation (Frank Waterhouse, Manager)  
Bayless (Robert Chavez, Chief Pilot)

These tenants do not appear to have required NPDES permit coverage, are not signatory to the FCRA plan and, although tenants may be required by lease to adhere to various pollutant control practices, conducting these activities appears to be left up to the individual tenants. Rather, according to the FCRA SWPPP, each "may" be required to develop and implement their own SWPPP by the airport authority that includes specific controls for "industrial activities" conducted at their individual facilities. FCRA apparently expects that each of the facility specific SWPPPs should list specific training, maintenance, housekeeping, inspection, and performance activities to be conducted by area personnel at specific intervals and within specific time frames. Although these facilities were not inspected on this date, facility specific SWPPPs may, or may not exist, but at any rate, are not integrated with the plan for the entire airport, even though FCRA is ultimately responsible for compliance with all terms and conditions of the MSGP applicable to its storm water outfalls. Since the FCRA SWPPP already provides the basis for an integrated plan, tenants, if they don't want to develop their own plan, could develop appropriate and complete, additional site specific requirements to be incorporated into the FCRA SWPPP, sign and certify the integrated SWPPP, obtain required permit coverage and implement the applicable requirements for their operational areas.

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
<b>Routine Facility Inspections</b>			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	<input type="checkbox"/> N	No inspections documented for the first three quarters of 2010.
Are inspections documented, including: <ul style="list-style-type: none"> <li>• Date and time <b>No time</b></li> <li>• Name and signature of inspector <b>N</b></li> <li>• Weather information and a description of discharge occurring at the time of the inspection <b>N</b></li> <li>• Previously unidentified discharges from site <b>NA</b></li> <li>• Control measures needing maintenance or repairs <b>Y</b></li> <li>• Failed control measures that need replacement <b>None noted</b></li> <li>• Incidents of noncompliance observed <b>Y</b></li> <li>• Additional control measures needed. <b>Y</b></li> </ul>	Y	<input type="checkbox"/> N	Signature by airport manager, not inspector.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>• Inactive and unstaffed sites</li> </ul>	Y	N	NA
<b>Quarterly Visual Assessment</b>			
Are quarterly visual assessments conducted?	<input type="checkbox"/> Y	N	But only document quarters with an actual discharge.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge <b>N</b></li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge <b>N</b></li> <li>• Collected in a clean, clear glass or plastic container. <b>Y</b></li> </ul>	Y	<input type="checkbox"/> N	No documentation that samples were collected within the first 30 minutes or 72 hours from the previous discharge.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>			
Are assessments documented, including: <ul style="list-style-type: none"> <li>• Sample location <b>Y</b></li> <li>• Sample collection date/time &amp; visual assessment date/time <b>Y</b></li> <li>• Personnel collecting sample &amp; performing assessment and their signature <b>Y</b></li> <li>• Nature of the discharge (runoff or snowmelt) <b>Y</b></li> <li>• Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) <b>Y*</b></li> <li>• Probable sources of contamination <b>Y</b></li> <li>• If applicable, reason for not taking samples within 1<sup>st</sup> 30 minutes. <b>N</b></li> </ul>	<input checked="" type="checkbox"/>	N	* Use different terminology for some parameters so observations are unclear.
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> <li>• Adverse weather conditions</li> <li>• Climates with irregular storm water runoff</li> <li>• Areas subject to snow</li> <li>• Substantially identical outfalls (per 5.1.5.2)</li> <li>• Inactive and unstaffed sites.</li> </ul>	Y	<input checked="" type="checkbox"/>	
<b>Comprehensive Site Inspections</b>			
Are comprehensive site inspections conducted annually (start 9/29/09)?	<input checked="" type="checkbox"/>	N	Apparently since the annual report says it is based on a 9-28-2009 inspection but this inspection report was not available on the date of this compliance inspection.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	<input checked="" type="checkbox"/>	Inspection conducted by Animas Environmental. No documentation that a pollution team member was included. No qualifications are documented.
Cover all areas of the facility?	<input checked="" type="checkbox"/>	N	
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	<input checked="" type="checkbox"/>	N	Visual.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>		
<p>Include observations of the following:</p> <ul style="list-style-type: none"> <li>• Industrial materials, residue, or trash that may have or could come into contact with storm water <b>Y</b></li> <li>• Leaks or spills from industrial equipment, drums, tanks, and other containers <b>Y</b></li> <li>• Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site <b>N</b></li> <li>• Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas <b>Y</b></li> <li>• Control measures needing replacement, maintenance, or repair <b>Y</b></li> <li>• All storm water control measures observed. <b>Y</b></li> </ul>	<input checked="" type="checkbox"/>	N
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> <li>• Date of inspection <b>Y</b></li> <li>• Names and titles of personnel making the inspection <b>Y</b></li> <li>• Findings from examination of areas of facility from Part 4.3.1 <b>Y</b></li> <li>• All observations relating to implementation of control measures <b>Y</b></li> <li>• Any required revisions to the SWPPP resulting from inspection <b>Y</b></li> <li>• Any incidents of noncompliance identified OR certification that facility is in compliance with the permit <b>Y</b></li> <li>• A statement signed in accordance with Appendix B, Subsection 11 <b>Y</b></li> </ul>	<input checked="" type="checkbox"/>	N

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring (Part 6)</b>			
<u>General</u>	<b>Notes:</b>		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	None required because of limited deicing/anti-icing chemical use.
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	NA
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	<input checked="" type="checkbox"/> N	But it does have a discussion about impaired waters monitoring.
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	No samples analysed.
<b>Benchmark Monitoring</b>			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>• Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall</li> <li>• Prior to commingling.</li> </ul>	Y	N	Not required since facility uses <100,000 gallons/year of glycol-based deicing chemicals and/or 100 tons or more of urea on an average annual basis.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	<input checked="" type="checkbox"/> N	
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	NA

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring</b>			
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> <li>Make the necessary modifications</li> <li>Continue quarterly monitoring</li> <li>Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA</li> <li>Natural background pollutant level documentation</li> </ul>	Y	N	NA
Exceptions, including (see 6.1 & 6.2): <ul style="list-style-type: none"> <li>Adverse weather conditions</li> <li>Climates with irregular storm water runoff</li> <li>Snowmelt</li> <li>Substantially identical outfalls (per 5.1.5.2)</li> <li>Inactive and unstaffed sites.</li> </ul>	Y	<input checked="" type="checkbox"/> N	
<b>Effluent Limitations Monitoring</b>			
Sampled once per year?	Y	N	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
<b>Other Required Monitoring</b>			
<ul style="list-style-type: none"> <li>State or Tribal provisions</li> <li>Discharges to impaired waters</li> <li>Additional monitoring required by EPA.</li> </ul>	Y	<input checked="" type="checkbox"/> N	
<b>Reporting (Part 7)</b>			
<u>General</u>		Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	NA
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	<input checked="" type="checkbox"/> Y	N	
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	N	NA

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Implementation</b>	
<p><b>Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff</b></p>	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>Most of the aircraft or ground vehicle maintenance, including minor washing, appears to be done indoors. There is a designated wash area with a sump and oil/water separator that does not appear to get much use. Care should be taken to advise and ensure that tenants use this area if washing is done outdoors. There are also designated de-icing and fueling areas that appear to be tributary to several swales.</p> <p>There is significant outdoor equipment and material storage at Bisti Aviation and a large construction debris storage and disposal area operated by other city departments.</p>
<p><b>Good Housekeeping</b></p>	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>Little trash, etc. observed but the equipment and material storage area at Bisti Aviation appears to require implementation of additional good housekeeping practices.</p>
<p><b>Preventative maintenance</b></p>	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>Structural controls appear to be well maintained. Preventative maintenance for equipment and systems is not addressed in the airport SWPPP. These may be specified by the tenants but tenant specific controls are not incorporated in that SWPPP.</p>

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Implementation</b>	
<b>Spill Prevention and Response</b>	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Spill response is addressed in the FAA Airport Certification Plan. This plan does not address small containers. SWPPP just says these must be plainly labeled. Tenant procedures are undocumented and unknown.</p>
<b>Erosion and Sediment Controls</b>	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Generally, areas are either paved, rocked or are otherwise stabilized with native vegetation except for the construction debris storage area operated by other city departments.</p>
<b>Management of Runoff</b>	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Facility has approximately 14 swales with discharge outlets close to the bottoms. Many of these discharge to an upper detention structure that drains to a larger flood control structure located at the intersection of Navajo Street and Municipal Drive. Others discharge directly to the larger structure. This larger structure has two inlets, one from the airport (drainage is piped from the airport area and the upper pond to this pond via underground pipe) and one from other areas adjacent to, and south of, Navajo Avenue. In general, dry detention ponds are not suitable to improve water quality. These ponds provide almost no pollutant removal but can, and often are, used for flood control. At least three other inlets discharge via outlets not identified in the SWPPP to two different San Juan River tributaries.</p>
<b>Salt Storage Piles</b>	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>No salt storage onsite.</p>

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Implementation</b>	
<b>Waste, Garbage and Floatable Debris</b>	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>Little litter in evidence on the date of this inspection except for some at the Bisti Aviation site. There is some trash and debris in the above detention/flood control structure.</p>
<b>Evidence of non-storm water discharges</b>	<p>There was some water in the above detention/flood control structure on this date. The water source could be from recent rain in the area or another unknown source.</p>
<b>Dust Generation and Vehicle Tracking of Industrial Materials</b>	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Most of the vehicle storage area is paved and no offsite tracking was observed on the date of this inspection. As noted above, there is a large construction debris storage and disposal area the use of which during wet conditions would likely create significant amounts of off-site tracking on Navajo Street.</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*)

Sector S specific requirements for the areas covered under the MSGP are addressed above.

# NPDES Industrial Storm Water Checklist (MSGP)

NMED/SWQB

## Official Photograph Log

Photo # 1

Photographer: Rich Powell	Date: 20 April 2011	Time: 1336
City/County: Farmington/San Juan	State: New Mexico	
Location: City of Farmington Four Corners Regional Airport		
Subject: Looking north at one of the outfalls and tributaries not identified in the SWPPP.		



# NPDES Industrial Storm Water Checklist (MSGP)

## NMED/SWQB

### Official Photograph Log

Photo # 2

Photographer: Rich Powell	Date: 20 April 2011	Time: 1336
City/County: Farmington/San Juan	State: New Mexico	
Location: City of Farmington Four Corners Regional Airport		
Subject: Looking east at the detention pond and outlet to the outfall pipe in the previous picture. Note outlet at bottom of structure. Airport fuel storage area in secondary containment in background.		



# NPDES Industrial Storm Water Checklist (MSGP)

## NMED/SWQB

### Official Photograph Log

Photo # 3

Photographer: Rich Powell	Date: 20 April 2011	Time: 1414
City/County: Farmington/San Juan	State: New Mexico	
Location: City of Farmington Four Corners Regional Airport		
Subject: Looking south at Public Works Department construction debris disposal area.		

