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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Surface Water Quality Bureau

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BUTCH TONGATE
Deputy Secretary

JAMES H. DAVIS, Ph.D.
Director
Resource Protection Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 21, 2012

Mr. Marty Bostrom, Director of Safety
CMH Manufacturing, Inc.
5000 Clayton Rd.
Maryville, TN 37804-5550

Re: Industrial Storm Water, SIC 2451, NPDES Compliance Evaluation Inspection, CMH West DBA Karsten Homes, NMR05GD26, September 18, 2012

Dear Mr. Bostrom,

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

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report, and required to correct any problems noted during the inspection and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify, in writing, both USEPA (Diana McDonald, USEPA (6EN-WM), 1445 Ross Ave., Dallas, Texas 75202) and NMED (at above address) regarding modifications and compliance schedules.

The NPDES Storm Water Multi-Sector General Permit for Industrial Activities (MSGP-2008) was reissued on September 29, 2008. The MSGP, fact sheet and other information on the industrial storm water program can be downloaded at <http://cfpub2.epa.gov/npdes/stormwater/msgp.cfm>.

Thank you for the cooperation and assistance that you provided during my visit to your site. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 222-9587.

Sincerely,
/s/ Sarah Holcomb
Sarah Holcomb
Environmental Scientist/Specialist
Surface Water Quality Bureau

Cc: Hannah Branning, USEPA (6EN-AS) via email
Rashida Bowlin, USEPA (6EN-AS) via email
Carol Peters-Wagnon, USEPA (6EN-WM) via email
Diana McDonald, USEPA (6EN-WM) via email
Darlene Whitten-Hill, USEPA, via email
Bill Chavez, NMED District I, via email
Bob Baker, General Manager, via email



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	D	2	6	11	12	1	2	0	9	1	8	17	18	~	19	S	20	2	
Remarks																													
M A N U F A C T U R E D H O M E S																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67				69		70		4		71		N		72		N		73				74		75				80	

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) CMH WEST DBA KARSTEN HOMES, ALBUQUERQUE, NM: FROM I-25, TAKE GIBSON EXIT AND HEAD WEST TO BROWDDWAY. TURN EAST ON SAN JOSE. FACILITY IS AT THE END OF THE ROAD. BERNALILLO COUNTY.		Entry Time /Date 0945 / 9-18-2012	Permit Effective Date 9-29-2008
		Exit Time/Date 1150 / 9-18-2012	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. JESSE NAVARRO, QA MANAGER (505) 242-5580 X 217 MR. KENNETH PRASEK, SAFETY MANAGER (505) 242-5580 X 209 MR. BOB BAKER, GENERAL MANAGER (505) 242-5580		Other Facility Data LAT/LONG: N. 35° 03' 16" W. -106° 38' 25"	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. MARTY BOSTROM, DIRECTOR OF SAFETY, CMH MANUFACTURING, INC. 5000 CLAYTON RD, MARYVILLE, TN 37804-5550 (865) 380-3000 X 5355		SIC: 2451	
		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)

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

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

1. PLEASE SEE FURTHER EXPLANATIONS FOR FURTHER DETAILS.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 9-21-2012
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 9-21-2012

National Database Information			General	
Inspection Type	CEI		Inspector Name	Sarah Holcomb
NPDES ID Number	NMR05GD26		Telephone	505-222-9587
Inspection Date	9-18-2012		Entry Time	0945 hours
Inspector Type (circle one)	EPA	<input type="checkbox"/> State	Exit Time	1150 hours
Facility Sector/ SIC/Activity Code	Sector A – SIC 2451		Signature	/s/ Sarah Holcomb

Facility Location Information				
Name/Location/ Mailing Address	CMH West DBA Karsten Homes Location: 2700 Karsten Ct. SE, Albuquerque, NM 87102 Mailing: CMH Manufacturing Inc., 5000 Clayton Rd., Maryville, TN 37804-5550			
GPS Coordinates	Latitude	35° 03' 16" N	Longitude	-106° 38' 25" W
Receiving Water(s)	Albuquerque MS4 thence to Rio Grande in 20.6.4.105 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	CMH Manufacturing Inc.	
Facility Contact	Mr. Kenneth Prasek, Safety Manager Mr. Bob Baker, General Manager	505-242-5580 x 209 505-242-5580
Authorized Official(s)	Mr. Marty Bostrom, Director of Safety	865-380-3000

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	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory	<input checked="" type="checkbox"/> Y	N
Operational Date	1998		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	N
NOI/Application Date	1-21-09		SWPPP Date	July 2009	
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?	Y	<input type="checkbox"/> N	NOI sent in January 2009, SWPPP revised July 2009.
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/> Y	N	
Copy of the permit language?	<input checked="" type="checkbox"/> Y	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input checked="" type="checkbox"/> Y	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 (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	Y	N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input checked="" type="checkbox"/> Y	N	Eligible under Criterion E.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	Y	<input type="checkbox"/> N	SWPPP signed by Phillip Hathcock, interim General Manager. Mr. Hathcock did not have authorization from a corporate officer to sign the SWPPP.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	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	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	Y	<input checked="" type="checkbox"/>	USGS quadrangle map was included in the SWPPP, however, the location of the facility was not marked at all.
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	
Does the site map contain the size of the property in acres?	<input checked="" type="checkbox"/>	N	8.5 acres, 8.0 acres of impervious surface.
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/>	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	<input checked="" type="checkbox"/>	Site map shows standpipe in retention basin as Outfall 001, but does not indicate how far away the MS4 channels or the Rio Grande is from the site.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	N/A
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	<input checked="" type="checkbox"/>	
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of the following activities where these activities are exposed to precipitation?	Y	<input checked="" type="checkbox"/>	Most of the items are listed on the site map, but the texture machines are currently located outdoors and are not indicated on the site map.

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
<ul style="list-style-type: none"> • Fueling stations Y • Vehicle and equipment maintenance and/or cleaning areas N/A • Loading/unloading areas Y • Locations used for the treatment, storage or disposal of wastes Y • Liquid storage tanks Y • Processing and storage areas Y • 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 Y • Transfer areas for substances in bulk Y • Machinery N 			
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	<input checked="" 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?	<input checked="" 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)?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	N/A

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 Y • Description of evaluation criteria Y • List of the outfalls or onsite drainage points directly observed Y • Different types of non-storm water discharges and source locations Y • Actions taken such as a list of control measures for elimination Y 	<input checked="" type="checkbox"/>	N	Dated 7-23-2009, signed by Clay Latimer, General Manager.
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?	<input checked="" type="checkbox"/>	N	Facility has not discharged from this site since they have had permit coverage. Please see further explanations.
<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"/>	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/>	N	
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?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/>	N	Separate PM Manual is kept and contains a "card" for each piece of equipment to keep track of scheduled maintenance.
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	
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 type="checkbox"/> Y	<input type="checkbox"/> N	N/A - site is mostly asphalt.
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"/> 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?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Facility will be installing new erosion controls in the retention pond in the near future.
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?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Annual training is conducted.
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"/> Y	<input 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"/> Y	<input type="checkbox"/> N	Facility staff cleans up trash blown into the retention pond once per week.
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

Karsten Homes started business in Albuquerque in 1998. They manufacture mobile homes at this facility. Karsten was bought out in 2005 by CMH Manufacturing, Inc, but still does business at this facility under the name CMH West DBA Karsten Homes.

The facility did have coverage under the 2000 permit under tracking number NMR05B261. When the NOI was submitted for approval under the new permit in 2008, the signature on that NOI was from Clay Latimer, General Manager. Also, the SWPPP was signed by Phillip Hathcock, Interim General Manager. However, the NOI and SWPPP must be signed by a responsible corporate officer, as spelled out in Appendix B.11.A.1 of the permit. Unless specific authorization is made to allow another party to sign documents for compliance under this permit, such as the SWPPP and/or reports that are sent to EPA, a corporate official of the company must sign. Other paperwork (including NOI resubmittals) has been signed more recently by Bob Baker, General Manager for the facility. If the facility would like to continue this process, an authorization letter must be placed into the SWPPP for future reference.

The facility includes a 1 acre retention pond at the west end of the site. It was designed to retain 4.36 acre feet of water, which was based on the 100 year event at 4.23 acre feet. The pond contains a 4 foot tall standpipe, which would discharge to the Albuquerque MS4 (AMAFCA channels) in the event of a large storm. According to facility representatives, there has not been a discharge from this site in the history of the facility.

Some of the painting is done outside when weather permits. As a result there is paint residual on the asphalt. Facility representatives indicated that the facility is shut down twice per year, and during those shutdowns, the paint area is scraped, and those materials are disposed in one of the onsite dumpsters.

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?	<input checked="" type="checkbox"/> Y	N	Inspections are conducted monthly, as per their SWPPP.
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. 	<input checked="" type="checkbox"/> Y	N	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	N	N/A
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	Y	<input checked="" type="checkbox"/> N	There has been no discharge from the site, however an inspection form is filled out to indicate no discharge.
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	N/A
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) 	Y	N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

<ul style="list-style-type: none"> 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. 			
<p>Exceptions, including (see 4.2.3):</p> <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Areas subject to snow Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	Y	N	N/A
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input checked="" type="checkbox"/>	N	
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input checked="" type="checkbox"/>	N	
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?	Y	N	N/A
Inspections			
<p>Include observations of the following:</p> <ul style="list-style-type: none"> Industrial materials, residue, or trash that may have or could come into contact with storm water Leaks or spills from industrial equipment, drums, tanks, and other containers Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas Control measures needing replacement, maintenance, or repair All storm water control measures observed. 	<input checked="" type="checkbox"/>	N	
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> Date of inspection Names and titles of personnel making the inspection Findings from examination of areas of 	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

facility from Part 4.3.1 <ul style="list-style-type: none"> All observations relating to implementation of control measures Any required revisions to the SWPPP resulting from inspection Any incidents of noncompliance identified OR certification that facility is in compliance with the permit A statement signed in accordance with Appendix B, Subsection 11 			
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	<input type="checkbox"/> N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input type="checkbox"/> Y	<input type="checkbox"/> 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 Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall Prior to commingling. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	There has not been a discharge from this site.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Monitoring			
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 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

available and economically practicable and achievable, continue monitoring once per year, notify EPA <ul style="list-style-type: none"> • Natural background pollutant level documentation 			
Exceptions, including (see 6.1 & 6.2): <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			
Sampled once per year?	Y	N	There has not been a discharge from this site.
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	N/A
Other Required Monitoring			
<ul style="list-style-type: none"> • State or Tribal provisions • Discharges to impaired waters • Additional monitoring required by EPA. 	Y	N	N/A
Reporting (Part 7)			
<u>General</u>	Notes:		
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	<input checked="" type="checkbox"/>	N	MDMRs have been submitted as required.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	<input checked="" type="checkbox"/>	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	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>Most of the homebuilding is done indoors. When materials are dropped off at the facility, all liquids are moved indoors immediately. The untreated wood materials are stored outside and used as needed. The waste materials are sent to dumpsters in the southwest corner of the site. A third party waste hauler picks up the dumpsters as needed. Care is taken to ensure that no liquids go into the dumpsters. Materials that are being dried out are covered with a tarp if there is a rain event. The facility has a pretreatment permit from the Albuquerque Bernalillo County Water Utility Authority (ABCWUA) to discharge used paint water into the sanitary sewer. This occurs at a pipe on the southern side of the facility (please see Photo #1).</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>Facility staff sweeps the refuse area each night to ensure that particulates and other trash are not carried into the retention pond. Wood stored outdoors is clean and orderly.</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>A preventative maintenance manual is kept separately from the SWPPP. This manual details maintenance schedules for each piece of equipment on the facility's site. Maintenance is done with spill containment in mind with drip pans, etc.</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>The facility keeps a spill kit at the site in the event of a spill, and facility staff is trained on how to use the spill kit materials at their yearly trainings.</p>

NPDES Industrial Storm Water Checklist (MSGP)

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>The site is mostly paved (8.0 of 8.5 acres) and whatever sediment is generated is settled out in the facility's 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>All runoff from the site is directed to the retention pond.</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>Facility staff picks up floatables and garbage out of the retention pond once per week. The site was clean at the time of this inspection.</p>
Evidence of non-storm water discharges	<p>The facility currently has allowable non-stormwater discharges as air conditioner condensate, and air compressor condensate. The compressor condensate does travel through an oil-water separator before discharge to the ground outside. The facility has not sampled to confirm that the compressor condensate is clean, and the inspector encouraged the facility to do so.</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>The site is mostly paved and the trucks on site do not come into contact with any of the homebuilding materials.</p>

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NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Sarah Holcomb	Date: 9-18-2012	Time: 1133 hours
City/County: Albuquerque/Bernalillo County		
Location: Karsten Homes Manufacturing, near Broadway and San Jose.		
Subject: Totes containing used paint water. A pump is used to dispose of the water through the sanitary sewer. Facility has a pretreatment permit with the ABCWUA to do this. Note there is no secondary containment and the only way to prevent a spill is to cover the totes with a tarp during a rain event. Facility representatives indicate that they are working on a fix for this area.		

