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ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail – Return Receipt Requested

November 16, 2011

Mr. David Blair, Vice President
HollyFrontier/Holly Asphalt
Desert Ridge Corporate Center
20860 N. Tatum Blvd. Suite 150
Phoenix, AZ 85050

Re: Industrial Storm Water, SIC 2951, NPDES Compliance Evaluation Inspection, Holly Asphalt Company, NMR05GF17, November 10, 2011

Dear Mr. Blair,

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 your facility manager, Ms. Debra French, 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: Marcia Gail Adams, USEPA (6EN-AS) via e-mail
Samuel Tate, USEPA (6EN-AS) via e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail
Diana McDonald, USEPA (6EN-WM) via e-mail
Darlene Whitten-Hill (6EN-WM) via e-mail
William Chavez, Acting NMED District I Manager (via e-mail)
Ms. Debra French, Supervisor, Plant Operations, Holly Asphalt Company (via e-mail)



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	F	1	7	11	12	1	1	1	1	1	0	17	18	~	19	S	20	2	
Remarks																													
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>) HOLLY ASPHALT COMPANY, ALBUQUERQUE, NM, BERNALILLO COUNTY: FROM I-25, TAKE THE COMANCHE RD EXIT, AND HEAD WEST ON COMANCHE. TURN RIGHT ONTO EDITH AND FACILITY IS ON THE WEST SIDE OF THE ROAD AT 4949.		Entry Time /Date 0930 HOURS / 11-10-2011	Permit Effective Date 9-29-2008
		Exit Time/Date 1300 HOURS / 11-10-2011	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MS. DEBRA FRENCH, SUPERVISOR, PLANT OPERATIONS (505) 761-5579		Other Facility Data GPS: N. 35° 7' 48.49" W. -106° 37' 56.94"	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. DAVID BLAIR, VICE PRESIDENT 20860 N. TATUM BLVD. SUITE 150, PHOENIX, AZ 85050		Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	
		SIC 2951	

Section C: Areas Evaluated During Inspection

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

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

- PLEASE SEE REPORT FOR FURTHER EXPLANATIONS.
- AN EXIT INTERVIEW TO DISCUSS PRELIMINARY FINDINGS OF THE INSPECTION WAS CONDUCTED AT APPROXIMATELY 1245 HOURS WITH MS. FRENCH AT THE FACILITY.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 11-16-2011
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 11-16-2011

National Database Information			General		
Inspection Type	CEI		Inspector Name	Sarah Holcomb	
NPDES ID Number	NMR05GF17		Telephone	505-222-9587	
Inspection Date	11-10-2011		Entry Time	0930 hours	
Inspector Type (circle one)	EPA	<input checked="" type="checkbox"/> State	EPA Oversight	Exit Time	1300 hours
Facility Sector/ SIC/Activity Code	Sector D, SIC 2951		Signature	/s/ Sarah Holcomb	

Facility Location Information				
Name/Location/ Mailing Address	Holly Asphalt Company 4949 Edith Blvd., Albuquerque, NM 87105 Mailing address: PO Box 26743, Albuquerque, NM 87125			
GPS Coordinates	Latitude	35° 7' 48.49"	Longitude	-106° 37' 56.94"
Receiving Water(s)	Albuquerque MS4 thence to the Rio Grande in segment 20.6.4.106 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Holly Asphalt Company	
Facility Contact	Ms. Debra French, Supervisor	505-761-5579
Authorized Official(s)	Mr. David Blair, Vice President	

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	Y	<input checked="" type="checkbox"/> N
Operational Date	1971		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	N
NOI/Application Date	1-30-2009		SWPPP Date	Dec 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	
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?	<input checked="" type="checkbox"/>	N	
<p>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)?</p> <p>Applicable to:</p> <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"/>	N	SWPPP references the SPCC, MSDS library and the FRP.
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	Please see Photo # 5
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?	Y	<input checked="" type="checkbox"/>	Mr. Roger Kilpatrick signed the SWPPP on 1-22-09 (former plant supervisor). No signatory authority document was in the SWPPP.
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)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/>	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/>	N	
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	
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"/>	
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 – according to facility representative, there have been no significant spills.
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	N	N/A – no non-storm water discharges.
Does the site map contain locations of the following activities where these	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
activities are exposed to precipitation? • Fueling stations N/A • Vehicle and equipment maintenance and/or cleaning areas Yes • Loading/unloading areas Yes • Locations used for the treatment, storage or disposal of wastes Yes • Liquid storage tanks Yes • Processing and storage areas Yes • 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 Yes • Transfer areas for substances in bulk Yes • Machinery Yes			
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	<input type="checkbox"/> N	
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	<input type="checkbox"/> N	SWPPP states there are no non-stormwater discharges.
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	Asphalt storage, chemical storage, drum & tote storage, railcar unloading, cooling systems, water softeners, tanker truck loading/unloading, polymer mixing & emulsion blending, heating systems, waste generation/storage/accumulation, shop/maintenance/equipment storage, pesticide use/storage/disposal.
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?	Y	N	N/A – no spills according to facility representative.

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 1/22/2009 · 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?	<input checked="" type="checkbox"/>	N	SWPPP states no. Pallets of salt are stored outside the mill building.
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	<input checked="" type="checkbox"/>	N	

<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	

<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include a schedule for pickup and disposal of wastes and	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

routine inspections of tanks and drums?			
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"/> Y	<input type="checkbox"/> N	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input type="checkbox"/> Y	<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"/> Y	<input 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"/> Y	<input type="checkbox"/> N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	<input 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"/> Y	<input 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"/> Y	<input 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	
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	N/A
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 checked="" type="checkbox"/>	N	The salt piles are enclosed within bags and stored on pallets. The pallets are stored outside. Please see photo # 1.
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	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

The Holly Asphalt Company site in Albuquerque is comprised of 6.97 acres, where the company stores asphalt, mixes emulsions and stores the chemicals used to make emulsions. The facility also has a truck loading area. The facility has rail access, as well, and the rail deliveries are stored in one of two million gallon tanks at the eastern end of the facility. The company started business in Albuquerque in 1971 as Burris Oil & Chemical, and has changed hands a few times, and most recently in 2005, Navajo Refining purchased Koch's portion of the company.

The facility was in the process of changing the steam lines on the tanks throughout the facility at the time of this inspection. This resulted in some condensate puddles on the ground, but not enough it appeared, to run off from the site.

The facility had a comprehensive SWPPP that was last updated in 2008. The facility manager, Ms. Debra French, had only been hired as manager within the previous few weeks of the inspection and was still in the process of updating this paperwork.

The SWPPP claimed that the facility was eligible for permit coverage in accordance with Criterion A of the permit in Part 1.1.4.5. To support this eligibility, a critical habitat map of Bernalillo County was included, as well as a letter documenting a conversation with Mr. Joel Lusk of the US Fish and Wildlife Service. The definition of "action area" includes not just the facility's boundaries, but "all areas to be affected directly or indirectly by the stormwater discharges". It appears that a more appropriate certification may have been under Criterion E, which states that the discharge is "not likely to affect" any endangered species.

The site map of the facility needed updating with regards to documentation of TMDLs/impaired waters, locations of all potential pollutants (salt) and MS4s in relation to the facility. Run-on from the irrigation ditch on the east side also needed to be documented on the map.

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	<input checked="" type="checkbox"/> N	
Are inspections documented, including: <ul style="list-style-type: none"> · Date and time · Name and signature of inspector · Weather information and a description of discharge occurring at the time of the inspection · Previously unidentified discharges from site · Control measures needing maintenance or repairs · Failed control measures that need replacement · Incidents of noncompliance observed · Additional control measures needed. 	<input checked="" type="checkbox"/> Y	N	No inspections for 2008. 3 inspections for 2009. 4 inspections for 2010. 2 inspections for 2011 as of November.
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?	<input checked="" type="checkbox"/> 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. 	<input checked="" type="checkbox"/> Y	N	No discharge in 2008 – however only three quarters were documented as no discharge. No discharge in first 3 quarters of 2009 – sample documented in 4 th quarter. No discharge in first 2 quarters of 2010 – sample documented in 3 rd quarter. 4 th quarter not documented until February 2011. No discharge in 2011 but only documented one quarter.

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. 	<input checked="" type="checkbox"/>	N	
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> · Adverse weather conditions · Climates with irregular storm water runoff · Areas subject to snow · Substantially identical outfalls (per 5.1.5.2) · Inactive and unstaffed sites. 	Y	N	Facility may be eligible for an exception under climates with irregular stormwater runoff, but did not document this in the SWPPP.
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	<input checked="" type="checkbox"/>	2008's annual inspection did not consider past monitoring data. 2011's did.

NPDES Industrial Storm Water Checklist (MSGP)

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 facility from Part 4.3.1 · All observations relating to implementation of control measures · Any required revisions to the SWPPP resulting from inspection · Any incidents of noncompliance identified OR certification that facility is in compliance with the permit · A statement signed in accordance with Appendix B, Subsection 11 	<input checked="" type="checkbox"/>	N

NPDES Industrial Storm Water Checklist (MSGP)

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"/>	<input type="checkbox"/>	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input type="checkbox"/>	<input type="checkbox"/>	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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 checked="" type="checkbox"/>	<input type="checkbox"/>	
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Only one sample was taken for each year from 2009-2011.
Is the average of the first four quarterly samples < the parameter benchmark?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Only average of the first three.

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? · Make the necessary modifications · Continue quarterly monitoring · Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA · Natural background pollutant level documentation	<input checked="" type="checkbox"/>	N	In the prior permit term the average for TSS was much higher than the benchmark. The facility noted that due to run-on in the rail area TSS levels might be higher. In this permit sampling term, the TSS was still high. pH and oil & grease was within benchmarks, however.
Exceptions, including (see 6.1 & 6.2): · Adverse weather conditions · Climates with irregular storm water runoff · Snowmelt · Substantially identical outfalls (per 5.1.5.2) · Inactive and unstaffed sites.	<input checked="" type="checkbox"/>	N	Facility did not apply for the exception for climates with irregular stormwater runoff, which they may qualify for.
Effluent Limitations Monitoring			
Sampled once per year?	<input checked="" type="checkbox"/>	N	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	<input checked="" type="checkbox"/>	N	
Other Required Monitoring			
· 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?	Y	N	Not able to determine from the paperwork available.
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	Not able to tell from available paperwork.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	<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>Material is mostly stored in tanks. Tanks are then contained in concrete secondary containment pits. Facility follows good housekeeping practices for truck loading procedures.</p>
Good Housekeeping	<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>During this inspection it appeared that all materials were labeled and stored as they should be. The site looked clean and orderly.</p>
Preventative maintenance	<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>Permittee's representative indicated that staff performs routine inspections of all equipment.</p>

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Facility staff follow SOPs to prevent spills, such as staying with a truck while loading/unloading is occurring. Facility has a spill response plan contained within their SPCC.</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Most of the facility is paved to prevent erosion.</p>

NPDES Industrial Storm Water Checklist (MSGP)

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>There is one large stormwater pond that accepts runoff from a drop inlet referred to as Outfall 002 and the water then evaporates from the 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>Two salt storage piles were noted at the time of this inspection. The salt is contained in 20 pound bags which are then stored on pallets. The pallets are then enclosed in plastic. These pallets are stored outside.</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>The facility was clean at the time of this inspection. No trash or garbage was noted onsite.</p>
Evidence of non-storm water discharges	<p>The facility was currently replacing/repairing the steam lines on the cationic side. This resulted in some steam condensation water puddles, but not in amounts to actually runoff from the site.</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 facility is paved. No erosion issues were noted at this time.</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*)

Overall, implementation of the SWPPP appeared to be in good order. The paperwork should be updated to completely reflect current conditions at the facility, and benchmark sampling should be done more often, as required (4 samples are missing for 2008, and 3 samples are missing for 2009, 2010 and 2011).

NPDES Industrial Storm Water Checklist (MSGP)

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Sarah Holcomb	Date: 11-10-2011	Time: 1016 hours
City/County: Albuquerque/Bernalillo County		
Location: Holly Asphalt Company, near Edith and Comanche.		
Subject: Salt storage piles near the mill building.		



NPDES Industrial Storm Water Checklist (MSGP)

NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Sarah Holcomb	Date: 11-10-2011	Time: 1024 hours
City/County: Albuquerque/Bernalillo County		
Location: Holly Asphalt Company, near Edith and Comanche.		
Subject: Stormwater drain near asphalt storage tanks near the southwest side of the site. This storm water drain (according to the SWPPP map) is directed to the onsite stormwater retention pond. There was a definite oil sheen noted on the water within the storm drain at the time of the inspection.		



NPDES Industrial Storm Water Checklist (MSGP)

NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Sarah Holcomb	Date: 11-10-2011	Time: 1025 hours
City/County: Albuquerque/Bernalillo County		
Location: Holly Asphalt Company, near Edith and Comanche.		
Subject: Asphalt capture buckets awaiting a turn in the oven. The asphalt is recycled back into the asphalt storage tanks once captured during maintenance activities at the facility. There were a large number of these buckets (more than usual according to the permittee's representative) because of the steam line maintenance.		



NPDES Industrial Storm Water Checklist (MSGP)

NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Sarah Holcomb	Date: 11-10-2011	Time: 1034 hours
City/County: Albuquerque/Bernalillo County		
Location: Holly Asphalt Company, near Edith and Comanche.		
Subject: Typical spillage under the asphalt rail cars on the west side of the facility. Current practice is to wait until the material hardens, staff chip at the material until it is pried loose and then disposes of it.		



NPDES Industrial Storm Water Checklist (MSGP)

NMED/SWQB Official Photograph Log Photo # 5

Photographer: Sarah Holcomb	Date: 11-10-2011	Time: 1128 hours
City/County: Albuquerque/Bernalillo County		
Location: Holly Asphalt Company, near Edith and Comanche.		
Subject: Facility's SWPPP documentation of eligibility under ESA Criterion A.		

