



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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Deputy Secretary

Certified Mail - Return Receipt Requested

February 15, 2011

Mr. Gregory Smith, Plant Manager
PNM San Juan Generating Station
P.O. Box 227
Waterflow, New Mexico 87421

RE: Industrial Storm Water; SIC 4911; NPDES Compliance Evaluation Inspection, Public Service Company of New Mexico; San Juan Generating Station; NMR05GF19, February 1, 2011

Dear Mr. Smith:

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 the assistance and cooperation of your staff 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 Bohling, USEPA (6EN-AS) by email
Diana McDonald, USEPA (6EN-WM) by email
NMED, District I Albuquerque 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	F	1	9	11	12	1	1	0	2	0	1	17	18	~	19	S	20	2	
Remarks																													
S T E A M E L E C T R I C G E N E R A T I O N																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67						70	3					71	N	72	N	73													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) PUBLIC SERVICE COMPANY OF NEW MEXICO (NM CORPORATION) SAN JUAN GENERATING STATION, WATERFLOW, NM. - WEST OF FARMINGTON ON US HWY 64, 3 MILES NORTH ON CTY. RD. 6800 SAN JUAN COUNTY	Entry Time /Date 1225/2-1-11	Permit Effective Date 9-29-08
	Exit Time/Date 1300/2-3-11	Permit Expiration Date 9-29-13
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MICHAEL GOEN, ENVIRONMENTAL SERVICES MANAGER, 505-598-7533 DANNY KIMBALL, ENVIRONMENTAL ANALYST, 505-598-7533	Other Facility Data LAT 36 47 58.2 LONG -108 26 29.5 SIC 4911	
Name, Address of Responsible Official/Title/Phone and Fax Number GREGORY SMITH, PLANT MANAGER, P.O. BOX 227, WATERFLOW, NM 87421 505-598-7814	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)

S	Permit	N	Flow Measurement	N	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
M	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).
- AN EXIT INTERVIEW TO DISCUSS THE PRELIMINARY FINDINGS OF THIS INSPECTION WAS CONDUCTED WITH MESSRS. GOEN AND KIMBALL FROM APPROXIMATELY 1250 - 1300 HOURS ON FEBRUARY 3, 2011 AT THE SITE.
- SEE REPORT AND FURTHER EXPLANATIONS.

/s/ RICHARD E. POWELL	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2798	Date 2-15-11
Signature of Management QA Reviewer /s/ STEVEN M. BAUMGARN	Agency/Office/Phone and Fax Numbers NMED/SWQB 575-647-7981	Date 2-15-11

NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>			<u>General</u>	
Inspection Type	Compliance Evaluation		Inspector Name	Richard E. Powell
NPDES ID Number	NMR05GF19		Telephone	(505) 827-2798
Inspection Date	2/1/2011		Entry Time	1225/2-1-11
Inspector Type <i>(circle one)</i>	EPA	State	EPA Oversight	Exit Time 1300/2-3-11
Facility Sector/ SIC/Activity Code	O/4911 STEAM ELECTRIC		Signature	<i>/s/ RICHARD E. POWELL</i>

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	Public Service Company of New Mexico/San Juan Generating Station, P.O. Box 227, Waterflow, New Mexico 87421			
GPS Coordinates	Latitude	36 47 58.2	Longitude	-108 26 29.5
Receiving Water(s)	Westwater, Duck Pond & Shumway Arroyos; thence to the San Juan River in Segment 20.6.4.401 NMAC of the San Juan River Basin			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Public Service Company of New Mexico/San Juan Generating Station	
Facility Contact	Michael Goen, Environmental Services Mgr. Danny Kimball, Environmental Analyst	505-598-7533 505-598-7533
Authorized Official(s)	Gregory Smith, Plant Manager	505-598-7814

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
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	N
Operational Date	1974		SWPPP Implementation Satisfactory	Y	N
NOI/Application Date	1-30-2009		SWPPP Date	12-6-2010	
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	Original signed 12-31-2008. Re-signed by new plant manager on 12-6-2010.
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	Submitted an NOI dated December 2008 for coverage under the 2008 MSGP and received tracking #NMR05H161 and filed a 2 nd NOI on 1/30/2009. Terminated NMR05H161 on 8-16-2010.
Copy of the permit language?	<input checked="" type="checkbox"/>	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input checked="" type="checkbox"/>	N	
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	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"/>	SPCC and other programs referenced but not included.
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	Selected criterion B but no documentation was available that section 7 consultation with USF&WS was done.
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	
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	But needs to be updated to include current staff.
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?	<input checked="" type="checkbox"/> Y	N	
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	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<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"/> Y	N	Map with site numbers and legend.
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	14 total outfalls represented by 2 for monitoring purposes.
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"/> Y	N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	NA
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"> • Fueling stations YES • 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 NA • Machinery YES 	<input checked="" type="checkbox"/>	N	Yes but need to label equipment maintenance staging areas and new contractor's machinery staging areas on map.
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	N	There are no allowable non-storm water 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"/>	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/>	N	Yes but need to clarify specific activities and associated pollutants.
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> • Date • Description of evaluation criteria • List of the outfalls or onsite drainage points directly observed • Different types of non-storm water discharges and source locations • Actions taken such as a list of control measures for elimination. 	<input checked="" type="checkbox"/>	N	
Does salt storage occur at this facility?	<input checked="" type="checkbox"/>	N	Road de-icing material storage.
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	<input checked="" type="checkbox"/>	N	
Controls to Reduce Pollutants		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input checked="" type="checkbox"/>	N	Need to better document process.
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)?	Y	<input checked="" type="checkbox"/>	Facility has procedures but no schedules (e.g., WMNM pick-up, street sweeping interval).

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<input type="checkbox"/> N	Not in SWPPP but incorporated in computer aided maintenance system (Passport).
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	Incorporated in Passport but SWPPP needs to specifically address what is included in Passport procedures, including schedules.
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input type="checkbox"/> N	Incorporated in Passport but SWPPP needs to specifically address what is included in Passport procedures, including schedules.
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	Incorporated in Passport but SWPPP needs to specifically address what is included in Passport procedures, including schedules.
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	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	Y	<input type="checkbox"/> N	Barrels of lubricants, etc. scattered throughout plant site – many adjacent to traffic lanes not in secondary containment or protected by barriers.
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	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	N	Need to document or reference in the SWPPP where training records are located.
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)

Controls to Reduce Pollutants			Notes:
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	Many areas, including ditches, are eroding and need to be stabilized.
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?	<input checked="" type="checkbox"/> Y	N	
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/> Y	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"/> Y	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	N	
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?	Y	N	NA

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

PNM/San Juan Generating Station (SJGC) is a four unit, 1800 MW, coal-fired steam electric generating plant. Process wastewater discharges from this facility are addressed under individual NPDES permit NM0028606. Much of the storm water runoff from this facility is directed to the process wastewater circuit and does not discharge (NM0028606 is effectively a "no discharge" permit). Storm water runoff from some areas of the plant site, the closed construction debris landfill, numerous scrap and parts storage areas, contractor storage and staging areas, and vehicle/equipment parking and maintenance areas discharges from several outfalls to Duck Pond Arroyo and Westwater Arroyo, which are tributary to Shumway Arroyo and ultimately to the San Juan River. The permittee has selected two outfalls (004 and 005) as substantially identical outfalls for purposes of monitoring.

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	<input type="checkbox"/> N	Monthly inspections conducted.
Are inspections documented, including: <ul style="list-style-type: none"> • Date and time Y • Name and signature of inspector Y • Weather information and a description of discharge occurring at the time of the inspection Y • Previously unidentified discharges from site NA • Control measures needing maintenance or repairs Y • Failed control measures that need replacement None • Incidents of noncompliance observed Y • Additional control measures needed. None 	Y	<input checked="" type="checkbox"/> N	Corrective actions required are documented but need to document in the SWPPP when these are completed.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	<input type="checkbox"/> N	NA
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container. 	Y	<input checked="" type="checkbox"/> N	Assessments are generally conducted within 30 minutes. Container type is not documented.

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	NA
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/09)?	<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	Inspections are conducted at each unit and, generally, a member of the pollution prevention team accompanies unit personnel on the inspections. Qualifications of unit personnel are not 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	

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>But reports don't document that all control measures are observed.</p>
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> • Date of inspection • Names and titles of personnel making the inspection No titles. • 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 NA • 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"/>	N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	<input checked="" type="checkbox"/>	But runoff from the coal pile is completely contained.
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	NA
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input checked="" type="checkbox"/>	N	The lab bench sheets refer to the use of the 18 th and 19 th editions of Standard Methods.
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. 	Y	<input checked="" type="checkbox"/>	There is no documentation that samples are collected within 30 minutes.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	<input checked="" type="checkbox"/>	N	
Is the average of the first four quarterly samples < the parameter benchmark?	Y	<input checked="" type="checkbox"/>	

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
<p>Is the average of the first four quarterly samples > the parameter benchmark?</p> <ul style="list-style-type: none"> Make the necessary modifications Continue quarterly monitoring Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA Natural background pollutant level documentation 	<input checked="" type="checkbox"/>	N	<p>Benchmark values for total iron have been exceeded for the past 6 quarters at outfall 004 and for 7 out of the past 10 quarters at outfall 005. The permittee continues to investigate possible sources and solutions.</p> <p>There are several metal part and scrap storage areas scattered throughout the site that may contribute to the problem and these potential contributors should be investigated.</p>
<p>Exceptions, including (see 6.1 & 6.2):</p> <ul style="list-style-type: none"> Adverse weather conditions N Climates with irregular storm water runoff N Snowmelt N Substantially identical outfalls (per 5.1.5.2) Y Inactive and unstaffed sites. N 	<input checked="" type="checkbox"/>	N	
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	Y	N	
Reporting (Part 7)			
General		Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	<input checked="" type="checkbox"/>	But close.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/>	But close.
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)

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>Barrels of lubricants, etc. scattered throughout plant site – many adjacent to traffic lanes not in secondary containment or protected by barriers. Vehicle and equipment maintenance is generally conducted indoors. Fueling island is under roof but there does not appear to be any spill containment.</p> <p>There are several metal part and scrap storage areas scattered throughout the site that may contribute to total iron benchmark exceedances and discharges of other pollutants. These potential pollutant sources should be eliminated where possible, centralized into fewer areas with better, more suitable runoff controls where elimination is not possible, or some combination thereof.</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>Paved areas are swept daily where possible but there are many areas that can't be mechanically swept and there are significant amounts of materials in these areas.</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>Yes. Schedules and documentation in Passport system.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Addressed in SPCC plan, other plans and to some extent in the SWPPP.</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>There are many unpaved areas at this site that need to be stabilized to limit erosion. Several ditches that show excessive erosion are in need of extensive repair/maintenance. Many of these ditches appear to require structural controls to keep them from adding additional pollutants in storm water discharges.</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>Much of the storm water runoff from this facility is contained in the no discharge process wastewater circuit. Additional structural controls in ditches and in other areas may be warranted.</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>Salt piles are covered by tarps when not in use.</p>

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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>Little litter in evidence on the date of this inspection except in areas that appear to be associated with contractor activities.</p>
Evidence of non-storm water discharges	<p>None in evidence.</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>Many of the areas where there is normal vehicular traffic are paved. Ash disposal activities are conducted by the adjacent coal mining company and dust and tracking from these activities are addressed by that facility.</p>

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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*)

Most sector O specific requirements for the areas covered under the MSGP are addressed above. The SWPPP needs to better justify that controls suggested in Part 8.O.4 have been considered.