



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

SUSANA MARTINEZ
Governor
JOHN SANCHEZ
Lieutenant Governor

Harold Runnels Building, N2050
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.nmenv.state.nm.us

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

Certified Mail - Return Receipt Requested

March 10, 2011

Mr. Robert Snyder, Vice President
F & A Dairy Products, Inc.
335 South Crawford Boulevard
Las Cruces, New Mexico 88007

RE: Industrial; Storm Water; SIC 2022; NPDES Compliance Evaluation Inspection; F & A Dairy Products, Inc.; NMR05GF46; February 23, 2011

Dear Mr. Snyder:

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 III Las Cruces by email

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 | NMR05GF46 | | Telephone | (505) 827-2798 |
| Inspection Date | 2/23/2011 | | Entry Time | 0815/2-23-11 |
| Inspector Type <i>(circle one)</i> | EPA | State | Exit Time | 1410/2-23-11 |
| Facility Sector/ SIC/Activity Code | U/2022 | | Signature | <i>/s/ RICHARD E. POWELL</i> |

| <u>Facility Location Information</u> | | | | |
|--------------------------------------|--|------------|-----------|--------------|
| Name/Location/ Mailing Address | F & A Dairy Products, Inc., 355 South Crawford Blvd., Las Cruces, NM 88007 | | | |
| GPS Coordinates | Latitude | 32 16 00.7 | Longitude | -106 55 06.2 |
| Receiving Water(s) | Nafziger Arroyo; thence to the Rio Grande in Segment 20.6.4.101 NMAC of the Rio Grande Basin | | | |

| <u>Contact Information</u> | | |
|---|---|------------------------------|
| | Name(s) | Telephone |
| Name(s) and Role(s) of All Parties Meeting the Definition of Operator | F & A Dairy Products, Inc. | |
| Facility Contact | Marco Atts, Wastewater Manager Jerry Ibbara, Asst. Plant Manager | 575-647-1696 575-647-1696 |
| Authorized Official(s) | Robert Snyder, VP NM Operations | 575-647-1696 |

| <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 | 1994 | | SWPPP Implementation Satisfactory | Y | N |
| NOI/Application Date | 2-3-2009 | | SWPPP Date | 8-7-2009 | |
| If applicable, is no exposure certification on file? | Y | N | <i>Intentionally left blank</i> | | |

NPDES Industrial Storm Water Checklist (MSGP)

| SWPPP Review | | | |
|--|---------------------------------------|----------------------------|---|
| General | Notes: | | |
| Was the SWPPP completed prior to NOI submission? | Y | <input type="checkbox"/> N | Prepared by AARC Environmental, Inc. dated and signed 8-7-2009. |
| Copy of the NOI and acknowledgment letter from EPA? | Y | <input type="checkbox"/> N | NOI – yes, Acknowledgement – no. |
| 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? | Y | <input 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 | N | NA |
| Does the SWPPP include documentation to support eligibility under the Endangered Species Act? | Y | <input type="checkbox"/> N | SWPPP just says facility discharges will not affect. |
| Does the SWPPP include documentation to support eligibility under the Historic Preservation Act? | Y | <input 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"/> Y | N | |
| 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? | Y | <input checked="" type="checkbox"/> N | Facility makes Italian cheeses (mozzarella, provolone, etc.) |
| 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 | 40 acres. |
| 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)? | <input checked="" type="checkbox"/> Y | N | |
| Does the site map contain locations of all existing structural control measures? | <input checked="" type="checkbox"/> Y | N | But may need to update map to incorporate changes. |
| Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them? | Y | <input checked="" type="checkbox"/> N | On general location map. |
| Does the site map contain locations of all storm water conveyances including ditches, pipes and swales? | <input checked="" type="checkbox"/> Y | N | But need to indicate subsurface drains. |
| 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 | But need to include a legend for tank contents. |
| 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? | Y | <input checked="" type="checkbox"/> N | Map only shows 0001 – other discharge outlet(s) are not marked. |
| Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical? | Y | <input checked="" type="checkbox"/> N | Map only shows 0001 – other discharge outlet(s) are not marked. |
| 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 | <input checked="" type="checkbox"/> N | |

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 NA • Vehicle and equipment maintenance and/or cleaning areas NA • Loading/unloading areas YES • Locations used for the treatment, storage or disposal of wastes NO • Liquid storage tanks YES • Processing and storage areas NO • 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 Y • Machinery NA | Y | <input checked="" type="checkbox"/> N | <p>Anaerobic digesters & EQ tank not on map.</p> <p>Several storage areas around site not on map.</p> <p>Truck parking area(s) not on map.</p> <p>Map needs to be updated to show current site information.</p> |
| Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants? | Y | N | No significant sources. |
| Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released? | Y | <input checked="" type="checkbox"/> N | There are no allowable non-storm water discharges addressed in the SWPPP but there are several cooler condensate discharges at the site. |
| Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)? | <input checked="" type="checkbox"/> Y | N | |
| Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity? | <input checked="" type="checkbox"/> Y | N | Only materials listed are milk and cream. |
| Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP? | <input checked="" type="checkbox"/> Y | N | No larger spills documented. F & A should keep a log of all spills except in incidental amounts. |

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 3-23-2009 • 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 N • Actions taken such as a list of control measures for elimination. N | <input checked="" type="checkbox"/> | N | The non-storm water evaluation appears to be inaccurate given the number of non-storm water sources observed on the date of this inspection. |
| Does salt storage occur at this facility? | <input checked="" type="checkbox"/> | N | 50# bags used in cheese manufacture in indoor material storage. Some brine waste pumped to outdoor holding tanks for disposal. |
| Does the SWPPP include a summary of storm water sampling data for the previous permit term? | Y | N | NA |
| <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? | Y | <input checked="" type="checkbox"/> | Generic plan not really specific for this site. |
| Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1? | Y | <input checked="" type="checkbox"/> | |
| 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 | Most activities, including loading/unloading indoors or under roof and/or are located in areas that drain to the treatment plant via floor drains. |
| 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)

| 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 | Most activities are done on an on-call basis. |
| 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 | N | |
| Does the SWPPP include a schedule for preventative maintenance procedures? | <input checked="" type="checkbox"/> Y | 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? | Y | <input type="checkbox"/> N | Facility appears to have procedures but SWPPP only includes generic practices. |
| 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 | Usually original containers with labels. |
| 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 | N | |
| 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 | |
| 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 | Most areas where spills are likely to occur drain to the treatment plant. If plant upsets occur, effluent can be held in aerated lagoons. |

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 need to be stabilized although most of these areas discharge to detention ponds. |
| 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? | Y | <input checked="" type="checkbox"/> N | Employee training mostly covers indoor activities that likely don't have storm water impacts. Need to train appropriate staff and address activities outdoors at this specific site that can impact pollutants in storm water. |
| 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 | <input checked="" type="checkbox"/> N | There do not appear to be any non-storm water discharges at this site except those provisionally allowed under the MSGP. |

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

F & A manufactures Mozzarella and Provolone, and a lesser amount of other Italian type, cheese at this facility. All of the manufacturing processes are located indoors. These areas are drained via floor drains to an onsite treatment plant consisting of anaerobic digesters, an EQ tank all located in a diffused air floatation building, and a series of lagoons. Raw milk is received by truck in covered bays. Material and scrap storage, numerous tanks and various other activities are located outdoors. There are several, mostly small, detention ponds that capture storm water runoff located at the site. There appear to be several outfalls from the facility but only one is described in the SWPPP (0001) and no discussion regarding why this is considered substantially identical to other outfalls.

There are no allowable non-storm water discharges addressed in the SWPPP but there are several cooler condensate discharges at the site. There is also some whey tank seal leakage that leaves a residue on the surrounding paved area but there does not appear to be whey liquid flowing to the storm water system.

The SWPPP prepared for this facility appears to be very generic for sector U facilities. Most of the SWPPP is merely a repetition of the MSGP permit language and includes few specifics regarding this particular facility.

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 |
| There is only one (4 th quarter 2009) report documented in the SWPPP and the report is dated long after the inspection (3-23-2010). | | |
| Are inspections documented, including: <ul style="list-style-type: none"> • Date and time No time • Name and signature of inspector Y • Weather information and a description of discharge occurring at the time of the inspection N • Previously unidentified discharges from site N • Control measures needing maintenance or repairs N • Failed control measures that need replacement N • Incidents of noncompliance observed N • Additional control measures needed. N | Y | <input checked="" type="checkbox"/> N |
| Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites | Y | N |
| NA | | |
| 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. | Y | N |
| No discharge according to documentation. | | |

NPDES Industrial Storm Water Checklist (MSGP)

| Inspections | | | |
|---|---------------------------------------|---------------------------------------|---|
| <p>Are assessments documented, including:</p> <ul style="list-style-type: none"> • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes. | Y | N | NA |
| <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 | <input checked="" type="checkbox"/> N | <p>Although the SWPPP identifies only one outfall (0001), there appear to be several outfalls. There is no documentation regarding the eligibility for this single outfall as a substantially identical outfall representative of the site per the requirements in 5.1.5.2. Presumably, other outfalls were not observed to determine if there were any quarterly discharges from these outfalls.</p> |
| Comprehensive Site Inspections | | | |
| <p>Are comprehensive site inspections conducted annually (start 9/29/09)?</p> | Y | <input checked="" type="checkbox"/> N | <p>One report for inspection on 3-23-2009. Report not signed until 12-11-2009. None for 2010 documented.</p> |
| <p>Conducted by qualified personnel including at least one member of the storm water pollution prevention team?</p> | Y | <input checked="" type="checkbox"/> N | <p>No pollution team member. Inspection conducted by Zach Stornant, AARC auditor. No qualifications are documented.</p> |
| <p>Cover all areas of the facility?</p> | <input checked="" type="checkbox"/> Y | N | <p>Based on limited information in the report, probably but most of report documents information regarding the SWPPP rather than the site.</p> |
| <p>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?</p> | Y | N | NA |

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. | Y | <input type="checkbox"/> N |
| <p>Are inspections documented, including:</p> <ul style="list-style-type: none"> • Date of inspection Y • Names and titles of personnel making the inspection Y • Findings from examination of areas of facility from Part 4.3.1 N • All observations relating to implementation of control measures Y* • Any required revisions to the SWPPP resulting from inspection N • Any incidents of noncompliance identified OR certification that facility is in compliance with the permit N • A statement signed in accordance with Appendix B, Subsection 11 N | <input type="checkbox"/> Y | N |
| <p>No documentation in report that any of these were observed.</p> | | |
| <p>* Very general – report states: “Visual observations, structural BMP Implementation, and evidence of procedural BMPs (such as good housekeeping) show that this site is conscientiously applying the SWPPP.”</p> <p>Required certification statement not included but report is signed.</p> | | |

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? | Y | N | NA |
| Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring? | Y | N | NA |
| Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required) | Y | N | NA |
| Are samples analyzed in accordance with 40 CFR Part 136 methods? | Y | N | NA |
| 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 | N | Benchmark monitoring is not required for this subsector (U3). |
| Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage? | Y | N | NA |
| Is the average of the first four quarterly samples < the parameter benchmark? | Y | N | NA |

NPDES Industrial Storm Water Checklist (MSGP)

| 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 available and economically practicable and achievable, continue monitoring once per year, notify EPA Natural background pollutant level documentation | Y | N | NA |
| 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 | NA |
| 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) | | | |
| <u>General</u> | | Notes: | |
| Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period? | Y | N | NA |
| Is the annual report submitted by 45 days after conducting the comprehensive site inspection? | Y | <input checked="" type="checkbox"/> | No annual reports are documented in the SWPPP. |
| 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>Numerous product and raw material storage tanks are outdoors – some are adjacent to traffic lanes not in secondary containment but these are generally elevated several feet off the ground on concrete pads. Manufacturing operations and most material storage is indoors and loading/unloading operations are under roof.</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>Little trash, etc. observed but there are several scrap storage areas not addressed in the SWPPP. There is a partially full barrel of sodium hypochlorite located at the small scrap storage area on the west side of the plant.</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>Schedules and documentation for equipment. None documented for storm water detention basins, etc.</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>Almost all spills that occur at this facility, if any, would occur indoors where floor drains are piped to the facility's treatment system. There is some spillage outside from the whey tank seals that is exposed to storm water. There was some residue on the surrounding paved area on the date of this inspection. This residue should be periodically cleaned up and disposed.</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.</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>Some of the storm water runoff from this facility is contained in the no discharge process wastewater circuit. Other areas discharge to several detention structures.</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>Bags of salt used in the manufacturing process are received and stored indoors. Some brine waste is pumped to open outdoor holding tanks for disposal as needed.</p> |

NPDES Industrial Storm Water Checklist (MSGP)

| 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.</p> |
| Evidence of non-storm water discharges | <p>Although the SWPPP documents no non-storm water discharges at this facility, there are several sources of allowable non-storm water cooler condensate discharges at the site. There is also some whey tank seal leakage that leaves a residue on the surrounding paved area but there does not appear to be liquid flowing to the storm water system.</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.</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*)

Most sector U specific requirements for the areas covered under the MSGP are addressed above. Pest control is currently done by a contractor and materials are not stored onsite. According to the facility's representatives, the facility may begin their own in-house pest control program in the future. If this occurs, the SWPPP will need to address the following specific requirements:

8.U.4.2 - Potential Pollutant Sources. Document in your SWPPP, in addition to food and kindred products processing-related industrial activities, application and storage of pest control chemicals (e.g., rodenticides, insecticides, fungicides) used on plant grounds; and

8.U.3.1 - Employee Training. Address pest control in your employee training program.