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DAVE MARTIN
Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

Certified Mail – Return Receipt Requested

March 2, 2011

Mr. Edward Luchini, Owner
Luchini's Towing and Salvage
3621 W. Picacho Ave.
Las Cruces, NM 88007

Re: Industrial Storm Water, SIC 5015, NPDES Compliance Evaluation Inspection, Luchini's Towing and Salvage, NMR05GG07, February 21, 2011

Dear Mr. Luchini,

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 (Marcia Gail Bohling, USEPA (6EN-WC), 1445 Ross Ave., Dallas, Texas 75202) and NMED (at above address) regarding modifications and compliance schedules.

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

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

Sincerely,

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
Frank Fiore, NMED District 3 Manager, via e-mail



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 G 0 7 11 12 1 1 0 2 2 1 17 18 ~ 19 S 20 2					
Remarks					
A U T O R E C Y C L I N G					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 69	70 3	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) LUCHINI'S TOWING AND SALVAGE, LAS CRUCES, NM: FROM I-25, TAKE THE NORTH MAIN STREET EXIT (EXIT 6), TURN WEST ON MAIN AND FOLLOW UNTIL YOU REACH W PICACHO AVE. TURN WEST AGAIN. FACILITY IS AT 3621 W PICACHO AVE..	Entry Time /Date 1415 hours / 02-21-2011	Permit Effective Date 09-28-2008
	Exit Time/Date 1630 hours / 02-21-2011	Permit Expiration Date 09-28-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. EDWARD "ERIC" LUCHINI, OWNER (575) 524-2201	Other Facility Data N. 32° 18' 32.57" W. -106° 49' 53.86"	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. ERIC LUCHINI, OWNER (575) 524-2201 3621 W. PICACHO AVE., LAS CRUCES, NM 88007	SIC:5015 Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

- INSPECTOR ARRIVED ONSITE AT 1415 HOURS ON FEBRUARY 21, 2011 AND CONDUCTED THE ENTRANCE INTERVIEW WITH MR. ERIC LUCHINI, OWNER, WHERE THE INSPECTOR MADE INTRODUCTIONS, PRESENTED CREDENTIALS AND DISCUSSED THE PURPOSE OF THE INSPECTION.
- PLEASE SEE REPORT FOR FURTHER DETAILS.

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

National Database Information		General	
Inspection Type	CEI	Inspector Name	Sarah Holcomb
NPDES ID Number	NMR05GG07	Telephone	505-222-9587
Inspection Date	02-21-2011	Entry Time	1415 hours
Inspector Type (circle one)	EPA <input checked="" type="checkbox"/> State EPA Oversight	Exit Time	1630 hours
Facility Sector/ SIC/Activity Code	Sector M; SIC 5015	Signature	

Facility Location Information			
Name/Location/ Mailing Address	Luchini's Towing and Salvage 3621 W. Picacho Ave., Las Cruces, NM 88007		
GPS Coordinates	Latitude	N. 32° 18' 32.57"	Longitude W. -106° 49' 53.86"
Receiving Water(s)	Rio Grande in segment 20.6.4.101 NMAC		

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Luchini's Towing and Salvage	
Facility Contact	Mr. Eric Luchini, Owner	575-524-2201
Authorized Official(s)	Mr. Eric Luchini, Owner	575-524-2201

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N		SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Permit Type	<input checked="" type="checkbox"/> General <input type="checkbox"/> Individual		SWPPP Contents Satisfactory	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
Operational Date			SWPPP Implementation Satisfactory	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
NOI/Application Date	2-12-2009		SWPPP Date	8-7-2009	
If applicable, is no exposure certification on file?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> 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	NOI submitted 2-12-2009; SWPPP dated 8-7-2009
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/> Y	N	
Copy of the permit language?	<input checked="" type="checkbox"/> Y	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	Y	N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input type="checkbox"/> N	Certified Criterion A, but there is only a statement in the SWPPP that states the facility is "not likely to affect".
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input type="checkbox"/> N	Certified Criterion A, but there is no documentation that the facility is in compliance.
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/> Y	N	Signed by Eric Luchini, Owner/President, 2-30-2010
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)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/> Y	N	
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/> N	
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	
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	Rio Grande is not noted on the site map. River is only 0.2 miles from the river.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/> Y	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	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	N/A
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	<input checked="" type="checkbox"/> N	N/A – only one stormwater outfall is listed at the site.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	<input checked="" type="checkbox"/> N	
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	N/A

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 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 N/A • Machinery YES 	<input checked="" type="checkbox"/>	N	
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	<input checked="" type="checkbox"/>	N	
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	N	N/A
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	Dismantling and vehicle maintenance, outdoor storage, parts washing.
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/leaks have occurred within the past three years.

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 • 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	A non-stormwater discharge evaluation was conducted on 3-23-2009.
Does salt storage occur at this facility?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input checked="" type="checkbox"/>	
<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	Cover metal parts; permanent covers for auto body cores; redirect flow.
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/>	N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input checked="" type="checkbox"/>	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/>	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/>	N	2 spill kits are kept on site that will mitigate 50 gallons of spilled material each.
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/>	N	However, training was not well documented.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/>	N	Facility has not had to do this as of yet but procedures are noted in the SWPPP.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/>	N	Excavation is prohibited. SWPPP describes natural vegetation at perimeter of site as a BMP.
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?	Y	N	N/A site is bermed.
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	N/A no salt storage at this facility.
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:

Luchini's Towing and Salvage has been in operation since 1994.

The NOI application date for the site was 2-12-2009, however the SWPPP for the site was dated as 8-7-2009, and was not signed by Mr. Luchini until 2-30-2010.

Upon development of a SWPPP for an industrial site, a review of qualifications under the federal Endangered Species Act must be conducted. The facility certified "A" on their NOI, however there was no documentation (such as a biologist's report) to confirm that there were absolutely no endangered species on or affected by the site. Most likely, the facility should have certified "E" and documented the BMPs in place to mitigate harmful pollutants that could be carried offsite in a storm event.

The site map was missing a few elements required by the permit:

- Size of the property in acres
- Locations of all receiving waters (the Rio Grande was not indicated, and the river is only 0.2 miles away)
- Location of MS4s

Inspections are required quarterly, as are visual assessments. The facility documented quarterly inspections on 6-16-2009, and 12-14-2009 (not signed), 3-24-2010, 6-6-2010, 9-9-2010, and 12-15-2010. Therefore, there were two quarterly inspections missing from 2009, and the facility was due for another quarterly inspection on the date of this inspection. Documentation available for visual monitoring assessments indicated that there was not enough rainfall to collect samples. This is allowable, as long as the facility has indicated to EPA that they have qualified under the arid area exemption. This requires that the facility submit a potential schedule to EPA in their first sampling period, showing the modified sample collection schedule that will be used in the future.

There was no documentation that the facility had ever conducted a detailed yearly comprehensive inspection, and consequently filed an annual report with EPA. Facility also had not conducted benchmark monitoring, but this may be in keeping with the site's setup, and the berm around the site preventing most discharges.

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
Inspections are documented on: 6-16-2009, 12-14-2009, 3-24-2010, 6-10-2010, 9-9-2010, 12-15-2010.		
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. 	Y	<input checked="" type="checkbox"/> N
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	N
Quarterly Visual Assessment		
Are quarterly visual assessments conducted?	Y	<input checked="" type="checkbox"/> N
Documentation states that there is no qualifying rainfall.		
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

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	<input checked="" type="checkbox"/> N
<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
Comprehensive Site Inspections		
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input checked="" type="checkbox"/> N
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	<input checked="" type="checkbox"/> N
Cover all areas of the facility?	Y	<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"/> 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. 	Y	<input 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 	Y	<input 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"/> Y	N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	N/A
Benchmark Monitoring			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling. 	Y	<input checked="" type="checkbox"/> N	No monitoring documented.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	<input checked="" type="checkbox"/> N	
Is the average of the first four quarterly samples < the parameter benchmark?	Y	<input checked="" type="checkbox"/> N	

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	<input checked="" type="checkbox"/>	
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	<input checked="" type="checkbox"/>	
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	N/A
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	Y	N	N/A
Reporting (Part 7)			
<u>General</u>		Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	<input checked="" type="checkbox"/>	
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/>	
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<p>Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff</p>	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>Storage and dismantling operations are housed indoors. Parted out cars, engines and other items that are stored outdoors are lifted off the ground. Vehicles are all drained upon arrival. Site is mostly bermed to prevent runoff.</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>Site is clean and orderly, and materials are labeled, and stored within appropriate containers.</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>Inspections are conducted on behalf of the operator by AARC Environmental although they may not be documented. Facility staff also check for leaks or other situations that may need immediate attention.</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>Facility has 2 spill kits available on site, and each spill kit will mitigate 50 gallons worth of spilled materials. All vehicles are drained upon arrival, and fluids are all kept indoors.</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>Site is bermed to prevent sediment and other pollutants from escaping the site.</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>According to facility representative, what water has collected on site is usually soaked in to the ground.</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>There are no salt storage piles at this facility.</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>Trash is picked up as it is noticed. The site is very clean and orderly.</p>
Evidence of non-storm water discharges	<p>No non-storm water discharges were observed during this inspection.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
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 inspector did not note a problem with dust during this inspection, but there is the potential to track some of the materials off site.</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)*

1. Earthen berm is located most of the way around the site.
2. Secondary containment is used around materials stored outdoors. There are a few barrels of used oil located near the entrance to the site that should be placed within secondary containment.
3. Vehicle bodies and other parts are stored off the ground.

Sector Specific Requirements

Sector specific benchmark monitoring must be conducted quarterly (when there is stormwater runoff) for Total Suspended Solids (TSS), Total Aluminum, Total Iron and Total Lead. Facility allegedly has stormwater sampling data but according to facility representative, this was collected from puddles on site. Sampling only needs to be conducted when there is an actual discharge from the site.