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ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

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**Certified Mail – Return Receipt Requested**

October 24, 2011

Mr. & Mrs. Bill Serazio, Owners  
Western Sales and Salvage  
1810 Armstrong Ln.  
P.O. Box 1214  
Raton, NM 87740

**Re: Industrial Storm Water, SIC 5015/5093, NPDES Compliance Evaluation Inspection, Western Sales and Salvage, NMR05GG17, October 19, 2011**

Dear Mr. & Mrs. Serazio,

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

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

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

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

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

Cc: Marcia Gail Adams, USEPA (6EN-AS) via e-mail  
Samuel Tate, USEPA (6EN-AS) via e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail  
Diana McDonald, USEPA (6EN-WM) via e-mail  
Darlene Whitten-Hill (6EN-WM) via e-mail  
William Chavez, Acting NMED District I Manager (via e-mail)



### 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	1	7	11	12	1	1	1	0	1	9	17	18	~	19	S	20	2					
Remarks																																	
S E C T O R						M & N																											
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) <b>WESTERN SALES AND SALVAGE, RATON, NM: FROM I-25, TAKE CLAYTON RD. EXIT, AND TURN RIGHT ONTO HWY 68. FOLLOW HWY 64 FOR APPROXIMATELY ONE MILE. TURN RIGHT ONTO ARMSTRONG RD. FACILITY IS ON THE RIGHT.</b>		Entry Time /Date 1245 HOURS / 10-19-2011	Permit Effective Date 9-29-2008
		Exit Time/Date 1445 HOURS / 10-19-2011	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MRS. CARLA SERAZIO, OWNER (575) 445-3891		Other Facility Data GPS: N. 36° 88.271' W. -104° 41.369' SIC 5015 & 5093	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. & MRS. BILL SERAZIO, OWNERS 1810 ARMSTRONG RD./P.O. BOX 1214, RATON, NM 87740 (575) 445-3891		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	S	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

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

- PLEASE SEE REPORT FOR FURTHER EXPLANATIONS.
- AN EXIT INTERVIEW TO DISCUSS PRELIMINARY FINDINGS OF THE INSPECTION WAS CONDUCTED AT APPROXIMATELY 1440 HOURS WITH MRS. SERAZIO AT THE FACILITY.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 10-24-2011
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 10-24-2011

National Database Information			General		
Inspection Type	CEI		Inspector Name	Sarah Holcomb	
NPDES ID Number	NMR05GG17		Telephone	505-222-9587	
Inspection Date	10-19-2011		Entry Time	1245 hours	
Inspector Type (circle one)	EPA	<input type="checkbox"/> State	EPA Oversight	Exit Time	1445 hours
Facility Sector/ SIC/Activity Code	Sector M, SIC 5015 Sector N, SIC 5093		Signature	/s/ Sarah Holcomb	

Facility Location Information				
Name/Location/ Mailing Address	Western Sales and Salvage 1810 Armstrong Ln., Raton, NM 87740 Mailing address: P.O. Box 1214, Raton, NM 87740			
GPS Coordinates	Latitude	36° 88.271'	Longitude	-104° 41.369'
Receiving Water(s)	Raton Creek in segment 20.6.4.305 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Western Sales and Salvage	
Facility Contact	Mrs. Carla Serazio, Owner	575-445-3891
Authorized Official(s)	Mr. or Mrs. Bill or Carla Serazio, Owners	575-445-3891

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	N
Permit Type	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory	Y	<input checked="" type="checkbox"/> N
Operational Date	2006		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	N
NOI/Application Date	2-14-2009		SWPPP Date	2-4-2009	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	SWPPP completed by facility owner.
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	
Copy of the permit language?	<input checked="" type="checkbox"/>	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	<input checked="" type="checkbox"/>	Copies of visual monitoring were not documented.
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: · 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 checked="" type="checkbox"/>	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	Y	<input checked="" type="checkbox"/>	Mr. Serazio had not signed the document where it was indicated.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/>	N	Salvage and recycling
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	Y	<input checked="" type="checkbox"/>	
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	
Does the site map contain the size of the property in acres?	<input checked="" type="checkbox"/>	N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/>	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	N/A – according to facility representative, there have been no spills.
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/>	
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"/>	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	N/A – Raton is not designated as an MS4.
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	N/A – no non-storm water discharges.
Does the site map contain locations of the following activities where these	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
activities are exposed to precipitation? • Fueling stations <b>No</b> • Vehicle and equipment maintenance and/or cleaning areas <b>N/A</b> • Loading/unloading areas <b>Yes</b> • Locations used for the treatment, storage or disposal of wastes <b>Yes</b> • Liquid storage tanks <b>Yes</b> • Processing and storage areas <b>Yes</b> • 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 <b>Yes</b> • Transfer areas for substances in bulk <b>Yes</b> • Machinery <b>Yes</b>			
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	N/A – according to facility representative, grading is such that there is minimal (if any) run-on to the facility.
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/>	N	Incoming vehicle storage, long term vehicle storage, customer parking, parts storage, car crushing, baling, scrap processing, dismantling/maintenance shop.
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	N/A – no spills according to facility representative.

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> <li>· Date</li> <li>· Description of evaluation criteria</li> <li>· List of the outfalls or onsite drainage points directly observed</li> <li>· Different types of non-storm water discharges and source locations</li> <li>· Actions taken such as a list of control measures for elimination.</li> </ul>	<input checked="" type="checkbox"/>	N	
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"/>	No sampling data was available for the previous term.

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/>	N	
<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

routine inspections of tanks and drums?			
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/>	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	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/>	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/>	N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	<input checked="" type="checkbox"/>	N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	<input checked="" type="checkbox"/>	N	
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
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:**

Western Sales and Salvage is an auto recycler under SIC 5015, but also recycles metals, so the secondary SIC code for this facility is 5093. During the entrance interview with Mrs. Carla Serazio, she explained that the facility was in the process of shutting down due to the economy and business conditions related to the rise of stolen materials being redeemed for profit. Mrs. Serazio explained that the business would most likely be officially closed within the next six months, but noted that it could take longer with the cleanup process.

The SWPPP for this facility was put together by Mrs. Serazio. The SWPPP was very well put together and reflected current conditions at the site and discussed facility specific issues. The paperwork and documentation was very well put together and precise, reflecting the actual activity of the facility.

A few portions of the documentation were missing from the SWPPP, such as Endangered Species and Historic Properties information, and the visual sampling events were not documented.

The site map needed some updating to include the following items:

- Directions of stormwater flow
- Locations of all receiving waters in the area
- Locations of all stormwater monitoring points
- Locations of all stormwater inlets and outfalls

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections (Part 4)</b>			
<u>General</u>	Notes:		
<b>Routine Facility Inspections</b>			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	<input checked="" type="checkbox"/> N	
Are inspections documented, including: <ul style="list-style-type: none"> <li>· Date and time</li> <li>· Name and signature of inspector</li> <li>· Weather information and a description of discharge occurring at the time of the inspection</li> <li>· Previously unidentified discharges from site</li> <li>· Control measures needing maintenance or repairs</li> <li>· Failed control measures that need replacement</li> <li>· Incidents of noncompliance observed</li> <li>· Additional control measures needed.</li> </ul>	Y	<input checked="" type="checkbox"/> N	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>· Inactive and unstaffed sites</li> </ul>	Y	N	N/A
<b>Quarterly Visual Assessment</b>			
Are quarterly visual assessments conducted?	Y	<input checked="" type="checkbox"/> N	
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> <li>· Within the first 30 minutes of discharge</li> <li>· On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>· Collected in a clean, clear glass or plastic container.</li> </ul>	Y	<input checked="" type="checkbox"/> N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>			
Are assessments documented, including: <ul style="list-style-type: none"> <li>· Sample location</li> <li>· Sample collection date/time &amp; visual assessment date/time</li> <li>· Personnel collecting sample &amp; performing assessment and their signature</li> <li>· Nature of the discharge (runoff or snowmelt)</li> <li>· Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators)</li> <li>· Probable sources of contamination</li> <li>· If applicable, reason for not taking samples within 1<sup>st</sup> 30 minutes.</li> </ul>	Y	<input checked="" type="checkbox"/> N	
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> <li>· Adverse weather conditions</li> <li>· Climates with irregular storm water runoff</li> <li>· Areas subject to snow</li> <li>· Substantially identical outfalls (per 5.1.5.2)</li> <li>· Inactive and unstaffed sites.</li> </ul>	Y	N	N/A
<b>Comprehensive Site Inspections</b>			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input checked="" type="checkbox"/> Y	N	Conducted on 9-19-09, 9-10-10 and 9-19-11.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input checked="" type="checkbox"/> Y	N	
Cover all areas of the facility?	<input checked="" type="checkbox"/> Y	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"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>		
<p>Include observations of the following:</p> <ul style="list-style-type: none"> <li>· Industrial materials, residue, or trash that may have or could come into contact with storm water</li> <li>· Leaks or spills from industrial equipment, drums, tanks, and other containers</li> <li>· Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site</li> <li>· Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas</li> <li>· Control measures needing replacement, maintenance, or repair</li> <li>· All storm water control measures observed.</li> </ul>	<input checked="" type="checkbox"/>	N
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> <li>· Date of inspection</li> <li>· Names and titles of personnel making the inspection</li> <li>· Findings from examination of areas of facility from Part 4.3.1</li> <li>· All observations relating to implementation of control measures</li> <li>· Any required revisions to the SWPPP resulting from inspection</li> <li>· Any incidents of noncompliance identified OR certification that facility is in compliance with the permit</li> <li>· A statement signed in accordance with Appendix B, Subsection 11</li> </ul>	<input checked="" type="checkbox"/>	N

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring (Part 6)</b>		
<u>General</u>	<b>Notes:</b>	
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
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input checked="" type="checkbox"/> Y	N
<b>Benchmark Monitoring</b>		
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> <li>· Within the first 30 minutes of discharge</li> <li>· On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>· Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall</li> <li>· Prior to commingling</li> </ul>	<input checked="" type="checkbox"/> Y	N
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	<input checked="" type="checkbox"/> Y	N
Is the average of the first four quarterly samples < the parameter benchmark?	<input checked="" type="checkbox"/> Y	N

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring</b>			
Is the average of the first four quarterly samples > the parameter benchmark? · Make the necessary modifications · Continue quarterly monitoring · Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA · Natural background pollutant level documentation	Y	N	N/A
Exceptions, including (see 6.1 & 6.2): · Adverse weather conditions · Climates with irregular storm water runoff · Snowmelt · Substantially identical outfalls (per 5.1.5.2) · Inactive and unstaffed sites.	Y	<input checked="" type="checkbox"/> N	Facility did not apply for the exception for climates with irregular stormwater runoff, which they may qualify for.
<b>Effluent Limitations Monitoring</b>			
Sampled once per year?	Y	N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
<b>Other Required Monitoring</b>			
· State or Tribal provisions · Discharges to impaired waters · Additional monitoring required by EPA.	Y	N	N/A
<b>Reporting (Part 7)</b>			
<u>General</u>		Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	<input checked="" type="checkbox"/> Y	N	
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	<input checked="" type="checkbox"/> Y	N	
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<b>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</b>	<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>All fluids (i.e. used motor oil) are typically kept indoors, according to the facility representative, however, on the day of this inspection there were capped barrels stored outside without secondary containment. Vehicle dismantling is done within the facility's maintenance shop.</p>
<b>Good Housekeeping</b>	<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>There was a fair amount of garbage noted at the site. Facility representative indicated that due to the business shutting down, they had not been as diligent about clean up as of late.</p>
<b>Preventative maintenance</b>	<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 done on a daily basis to ensure that vehicles are not leaking.</p>

SWPPP Implementation	
<b>Spill Prevention and Response</b>	<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>Small spills are mitigated quickly by picking up the contaminated soils and disposing of the soil properly, according to the facility representative.</p>
<b>Erosion and Sediment Controls</b>	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>The main erosion control is the very large sedimentation pond located at the SE corner of the site.</p>

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Management of Runoff</b>	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Most stormwater is sent to the sedimentation pond but some runoff exits the site at the NW and SW corners.</p>
<b>Salt Storage Piles</b>	<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>No salt storage occurs at this site.</p>

<b>SWPPP Implementation</b>	
<b>Waste, Garbage and Floatable Debris</b>	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>Some trash was noted around the site. Facility representative indicated that this would be taken care of along with the general site clean up going along with the business shutdown.</p>
<b>Evidence of non-storm water discharges</b>	<p>No non-stormwater discharges were observed on the day of this inspection.</p>
<b>Dust Generation and Vehicle Tracking of Industrial Materials</b>	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Working vehicles are confined to the parking area at the front of the facility. The parking lot is graveled to assist in dust tracking reduction.</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)*

Tire bales are used as stormwater barriers along the edges of the site.

A ditch runs along the southern side of the facility to also help contain stormwater runoff from the site.

A large sedimentation pond sits at the southwestern corner of the site. According to the facility representative it was 12-14 feet deep at one point, but there has been some sediment transported to the pond. It would probably about 6 feet deep at the time of this inspection.

All maintenance and dismantling is done inside the facility shop located near the middle of the site.