



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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Resource Protection Division

**Certified Mail – Return Receipt Request**

February 8, 2013

Mr. Brian Gutierrez, Owner  
Mr. G's Pro Tow, LLC  
7625 Baca Lane  
Santa Fe, NM 87507

**RE: Industrial Stormwater Inspection; SIC 5093/5015; NPDES Compliance Evaluation Inspection; Mr. G's Pro Tow, LLC; NPDES Permit NMR05GG71; January 31, 2013**

Dear Mr. Gutierrez:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB), 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 the 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 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 Avenue, Dallas Texas 75202) and NMED (at the address above) regarding modifications and compliance issues.

The NPDES Stormwater Multi-Sector General Permit (MSGP) for industrial activities was re-issued on September 29, 2008. The MSGP, fact sheet and other information in the industrial stormwater program can be accessed at <http://cfpub2.epa.gov/npdes/stormwater/msgp.cfm>.

Mr. Brian Gutierrez

February 8, 2013

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If you have any questions about this inspection report, please do not hesitate to contact me at (505) 827-1041.

Sincerely,

*/s/ Sandra Gabaldón*

Sandra Gabaldón

Surface Water Quality Bureau

Cc: Carol Peters-Wagnon, (6EN-WM), USEPA, by email  
Rashida Bowlin, (6EN-AS), USEPA, by email  
Diana McDonald, (6EN-WM), USEPA, by email  
Hannah Branning, (6EN-WC), USEPA, by email  
Darlene Whitten-Hill, (6EN-AS), USEPA, by email  
District II, NMED, by email



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1   N   2   5   3   N   M   R   0   5   G   G   7   1   11   12   1   3   0   1   3   1   17   18   ~   19   S   20   2					
Remarks					
S   A   L   V   A   G   E   Y   A   R   D   S   /   R   E   C   Y   C   L   I   N   G					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67       69	70   2	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>MR. G'S PRO TOW, LLC</b> 7625 Baca Lane Santa Fe, NM 87507  <b>SANTA FE COUNTY</b>	Entry Time /Date 0935 / 01-31-2013	Permit Effective Date 9-29-2008
	Exit Time/Date 1128 Hours / 01-31-2013	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Brian Gutierrez, Owner, (505) 474-6969	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Brian Gutierrez, Owner (505) 474-6969 7625 Baca Lane Santa Fe, New Mexico 87507	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	GPS: 35°38'05.14"N -106°04'12.95"W SECTOR M, N

#### 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
U	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	U	Storm Water		Other:

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

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldón /s/ Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041 / (505) 827-0160	Date February 8, 2013
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB/ (505) 827-2798 / (505) 827-0160	Date February 8, 2013

## NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>		<u>General</u>	
Inspection Type	Compliance Evaluation Inspection	Inspector Name	Sandra Gabaldón
NPDES ID Number	NMR05GG71	Telephone	(505) 827-1041
Inspection Date	January 31, 2013	Entry Time	0935 Hours
Inspector Type <i>(circle one)</i>	EPA <input type="checkbox"/> State     EPA Oversight	Exit Time	1128 Hours
Facility Sector/ SIC/Activity Code	Sector M, N SIC 5015/5093	Signature	

<u>Facility Location Information</u>			
Name/Location/ Mailing Address	Mr. G's 7625 Baca Lane Santa Fe, NM 87507		
GPS Coordinates	Latitude	35°38'05.14" N	Longitude
			-106°04'12.95 W
Receiving Water(s)	Santa Fe River in segment 20.5.4.98 NMAC		

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Brian Gutierrez, Owner	(505) 474-6969
Facility Contact	Brian Gutierrez, Owner	(505) 474-6969
Authorized Official(s)	Brian Gutierrez, Owner	(505) 474-6969

<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	<input checked="" type="checkbox"/> General     Individual		SWPPP Contents Satisfactory	Y <input checked="" type="checkbox"/> N	
Operational Date	2007		SWPPP Implementation Satisfactory	Y <input checked="" type="checkbox"/> N	
NOI/Application Date	02/24/2009		SWPPP Date	10/2011	
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	Notice of Intent Signed/submitted: 02/24//2009 Stormwater Pollution Prevention Plan: 10/2011
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?	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: · 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	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input type="checkbox"/> N	NOI has criterion A selected. The USF&W Service has three endangered species listed in this area. Criterion A states "No federally-listed threatened or endangered species or their designated critical habitat are likely to occur in the action area."
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input type="checkbox"/> N	NOI has criterion A selected. However, Criterion A states construction or installation of stormwater control measures on the site do not cause subsurface disturbance. The site has a retention pond on the northwest corner of the property. The SWPPP has documentation supporting criterion B, rather than the selected criterion A on the NOI.
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	<input checked="" type="checkbox"/> Y	N	
Did all "operators" sign/certify the SWPPP?	Y	<input type="checkbox"/> N	SWPPP was signed and postdated (11/04/11) on the date of the inspection.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	N	Brian Gutierrez, Rebecca Glantz and James Environmental Management, LLC listed as team members.
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>			<b>Notes:</b>
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/>	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/>	N	
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	
Does the site map contain the size of the property in acres?	<input checked="" type="checkbox"/>	N	0.5 Acres
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/>	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	<input checked="" type="checkbox"/>	Santa Fe River in segment 20.6.4.98 NMAC – Outfall 001
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/>	The site has a possible discharge point in the northeast corner of the property that is not addressed.
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	<input checked="" type="checkbox"/>	No spills were identified in the SWPPP
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input checked="" type="checkbox"/>	N	Outfall 001
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	<input checked="" type="checkbox"/>	Santa Fe River - 001
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/>	Air conditioner and air compressor condensate locations not noted on site map.

## 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"> <li>· Fueling stations <b>N/A</b></li> <li>· Vehicle and equipment maintenance and/or cleaning areas <b>N/A</b></li> <li>· Loading/unloading areas <b>N</b></li> <li>· Locations used for the treatment, storage or disposal of wastes <b>Y</b></li> <li>· Liquid storage tanks <b>Y</b></li> <li>· Processing and storage areas <b>Y</b></li> <li>· 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>Y</b></li> <li>· Transfer areas for substances in bulk <b>Y</b></li> <li>· Machinery <b>Y</b></li> </ul>	Y	<input type="checkbox"/> N	There is no designated loading or unloading area on the site map.
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	<input type="checkbox"/> N	
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	<input type="checkbox"/> N	
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	
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	SWPPP states no spills from 2008 through 2011.

## 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 <b>Y</b></li> <li>· Description of evaluation criteria</li> <li>· List of the outfalls or onsite drainage points directly observed <b>N</b></li> <li>· Different types of non-storm water discharges and source locations <b>Y</b></li> <li>· Actions taken such as a list of control measures for elimination. <b>N</b></li> </ul>	Y	<input type="checkbox"/> N	Mr. Gutierrez signed and postdated (11/04/11) the non-stormwater certification on the date of the inspection 01/31/2013. Evaluation was performed on October 5, 2011 by Robert Quinlan, James Environmental Mgmt, Inc. Visual Inspection was performed. Evaluation does not list outfall or onsite drainage points directly observed. The evaluation states air conditioning and air compressor condensate flowing to the ground. No action or list of control measures were mentioned.
Does salt storage occur at this facility?	Y	<input type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input type="checkbox"/> N	
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/> Y	N	Retention pond
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"/> Y	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?	Y	<input type="checkbox"/> N	The SWPPP does have preventive maintenance procedures that include inspections, maintenance and repair. The SWPPP fails to provide any back-up practices should a runoff event occur.
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"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<input 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?	Y	<input type="checkbox"/> N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input 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 type="checkbox"/> Y	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?	Y	<input type="checkbox"/> N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	Y	<input type="checkbox"/> N	There are no barriers between material storage and traffic areas.
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input 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 type="checkbox"/> Y	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input type="checkbox"/> Y	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"/> Y	N	Retention pond noted in SWPPP
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	Recyclable material on the northeast corner of property is not contained in with any best management practices (BMPs), which may result in erosion.
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?	Y	N	No salt stored at this site.  N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/> Y	N	
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	<input checked="" type="checkbox"/> Y	N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	<input checked="" type="checkbox"/> N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### **Site Description:**

Mr. G's is a 0.5 acre lot. The area is arranged to fully process and recycle foreign and domestic automobiles and light trucks for the sale of used parts and accommodates the processing and recycling of aluminum, steel, residential and industrial scrap metal. They also accept white good.

The terrain is predominantly flat with sandy loam type soils with approximately 20% impervious surface.

Stormwater runoff in the scrap metal processing area has a discharge to the north, Outfall 001, and a possible discharge location on the northeast corner. This discharge is to the Santa Fe River directly in segment 20.6.4.98 NMAC.

## NPDES Industrial Storm Water Worksheet (Construction)

<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	The SWPPP contains forms. All forms are blank.
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	<input checked="" type="checkbox"/> N	
<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 Worksheet (Construction)

<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	<input checked="" type="checkbox"/> N
<b>Comprehensive Site Inspections</b>		<b>ONLY ONE INSPECTION HAS BEEN PERFORMED</b>
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?	<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?	Y	<input checked="" type="checkbox"/> N

## NPDES Industrial Storm Water Worksheet (Construction)

<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>	Y	<input checked="" type="checkbox"/>

## NPDES Industrial Storm Water Worksheet (Construction)

<b>Monitoring (Part 6)</b>			
<b>General</b>			<b>Notes:</b>
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input checked="" type="checkbox"/>	N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	No effluent limitations for either Sector M or N.
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input checked="" type="checkbox"/>	N	
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	<input checked="" type="checkbox"/>	
<b>Benchmark Monitoring</b>			<b>NO BENCHMARK MONITORING HAS BEEN PERFORMED.</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>	Y	<input checked="" type="checkbox"/>	
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	<input checked="" type="checkbox"/>	
Is the average of the first four quarterly samples < the parameter benchmark?	Y	<input checked="" type="checkbox"/>	

## NPDES Industrial Storm Water Worksheet (Construction)

<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	<input checked="" type="checkbox"/>	
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"/>	
<b>Effluent Limitations Monitoring</b>			<b>NO EFFLUENT LIMITATION MONITORING REQUIRED BY SECTOR M OR N.</b>
Sampled once per year?	Y	N	
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	
<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?	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 Worksheet (Construction)

<b>SWPPP Implementation</b>	
<p><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>	<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>There is a retention pond on the north side of the property. However, it is not maintained, which limits its capacity.</p> <p>There are areas of neglect and a clear indication that spills are not being addressed. See Photo #4</p>
<p><b>Good Housekeeping</b></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>Good Housekeeping is mentioned in the SWPPP in general terms, such as, “clean up garbage and waste regularly; Sweeping on a daily basis.” However, it is evident that no sweeping is done at this site.</p>
<p><b>Preventative maintenance</b></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 done on equipment and repairs made as necessary.</p>

## NPDES Industrial Storm Water Worksheet (Construction)

<b>SWPPP Implementation</b>	
<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>Spill procedures and response are discussed in the SWPPP. There are some oil stains noted on site. See photo #4.</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>Site is level with a retention pond on the north side of the property. However, the area around the retention pond has been filled with recyclables and weeds. This will reduce capacity and flows to the retention pond.</p>
<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>There are no crushed stones as stated in the SWPPP to reduce stormwater runoff from leaving the site.</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>N/A</p>

## NPDES Industrial Storm Water Worksheet (Construction)

<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>The area is free of garbage.</p>
<b>Evidence of non-storm water discharges</b>	<p>There is no evidence of non-stormwater discharges.</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>There is no dust suppression done at this site. The entrance is said to have “crushed stone” in the SWPPP. However, there is no crushed stone at the entrances to stop vehicle tracking from the site.</p>

## NPDES Industrial Storm Water Worksheet (Construction)

### **Notes on SWPPP Implementation and Sector Specific Requirements**

#### **SECTOR M:**

As stated in 8.M.2.3 Employee Training:

*“Address the following areas (at a minimum) in your employee training program: Proper handling (collection, storage, and disposal) of oil, used mineral spirits, anti-freeze, mercury switches, and solvents.”*

Mr. G's has annual training, but it does not address additional training required by Sector M.

#### **SECTOR N:**

Additional Inspection Requirements:

As stated in 8.N.5.1:

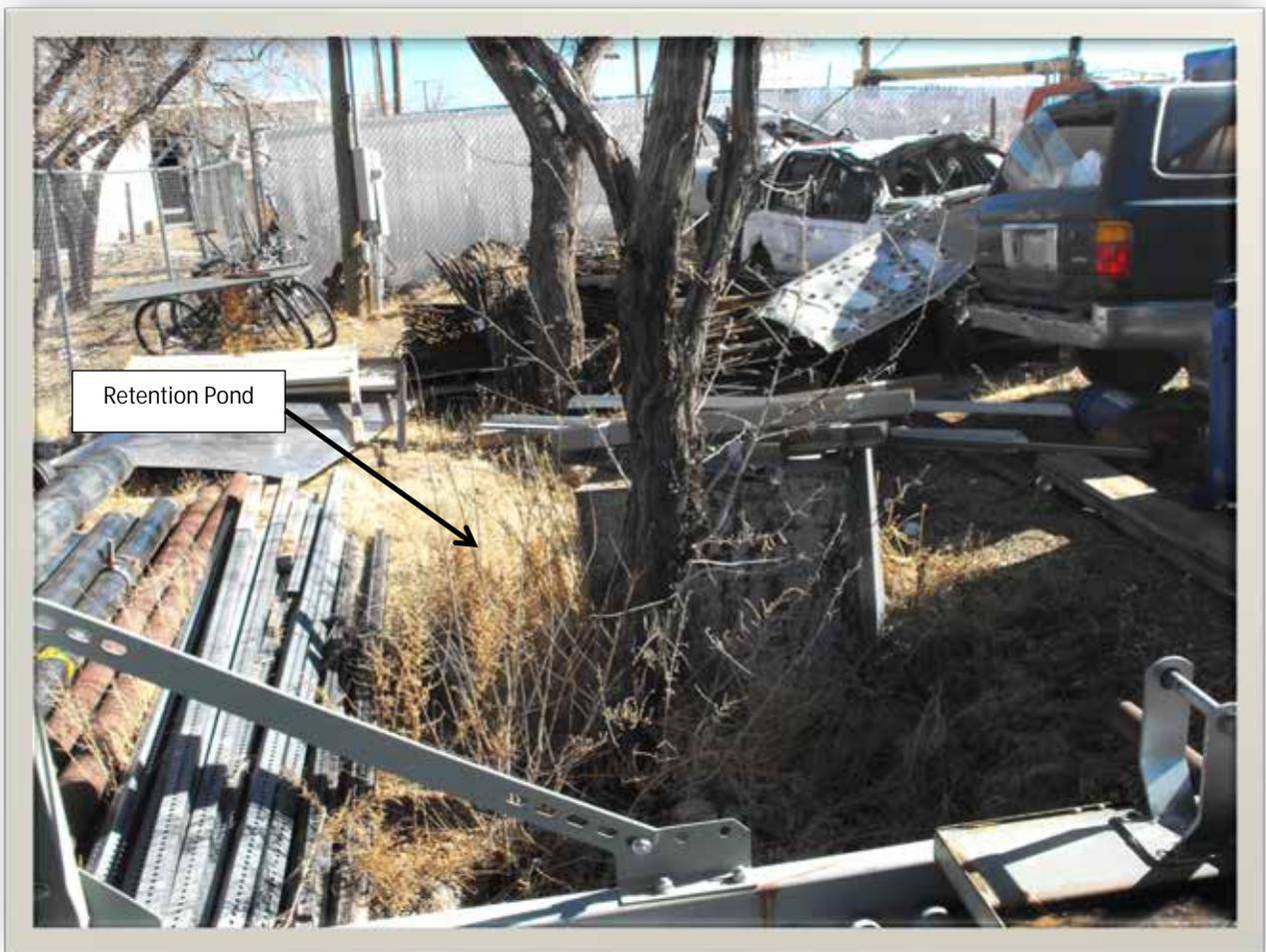
*“The inspections must be performed quarterly, pursuant to Part 4.1 and include, at a minimum, all areas where waste is generated, received, stored, treated, or disposed of and that are exposed to either precipitation or stormwater runoff.”*

Mr. G's has not performed any inspections pursuant to Part 4.1.

Because Mr. G's is a small area (0.5 acres) with a lot of products, it is necessary that it be maintained and kept orderly. The pictures provided show that areas have been neglected; barrels have not been labeled and are left outdoors. There is staining on the ground, away from the concrete pad. Inspections are a necessary part of the MSGP program in order to identify areas that need to be corrected or improved and to ensure that the BMPs in place are doing the job they are intended to do. The retention pond has been obstructed with various recyclables and has been filled with weeds and sediment, reducing the capacity.

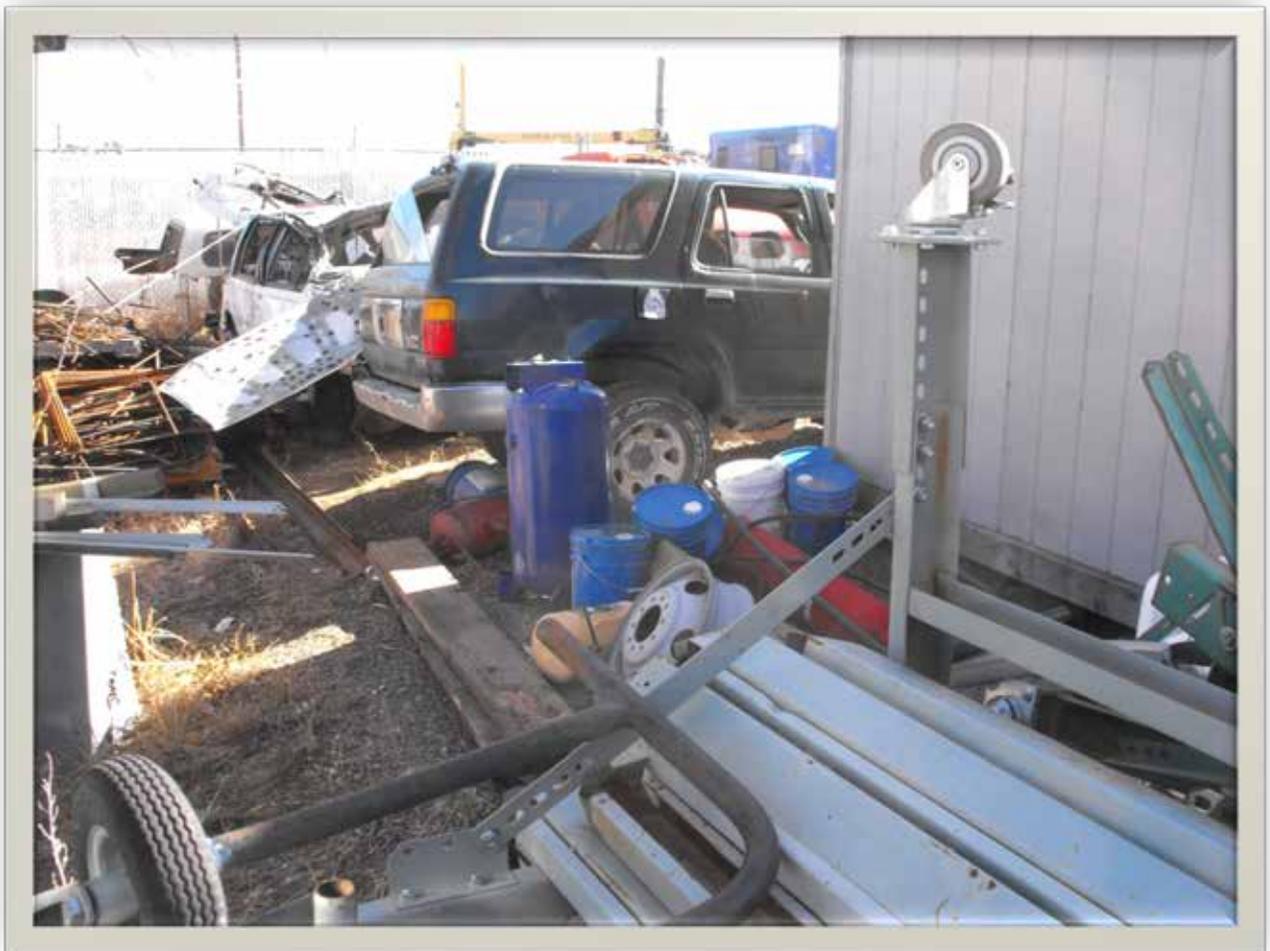
NMED/SWQB  
Official Photograph Log  
Photo # 1

Photographer: Daniel Valenta	Date: 01/31/2013	Time: 1114 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Mr. G's Pro Tow, LLC		
Subject: Retention pond on north side of property. Weeds and recyclables have reduced capacity and flow.		



NMED/SWQB  
Official Photograph Log  
Photo # 2

Photographer: Daniel Valenta	Date: 01/31/2013	Time: 1115 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Mr. G's Pro Tow, LLC		
Subject: Barrels, unlabeled outside.		



NMED/SWQB  
Official Photograph Log  
Photo # 3

Photographer: Daniel Valenta	Date: 01/31/2013	Time: 1115 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Mr. G's Pro Tow, LLC		
Subject: Barrels, unlabeled outside - facing north.		



NMED/SWQB  
Official Photograph Log  
Photo # 4

Photographer: Daniel Valenta	Date: 01/31/2013	Time: 1117 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Mr. G's Pro Tow, LLC		
Subject: Overall view of site, looking east		



NMED/SWQB  
Official Photograph Log  
Photo # 5

Photographer: Daniel Valenta	Date: 01/31/2013	Time: 1122 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Mr. G's Pro Tow, LLC		
Subject: Overall view of site, looking west.		



NMED/SWQB  
Official Photograph Log  
Photo # 6

Photographer: Daniel Valenta	Date: 01/31/2013	Time: 1122 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Mr. G's Pro Tow, LLC		
Subject: Looking north – possible discharge point.		

