



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

BILL RICHARDSON  
Governor  
DIANE DENISH  
Lieutenant Governor

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

RON CURRY  
Secretary  
SARAH COTTRELL  
Deputy Secretary

---

**Certified Mail – Return Receipt Requested**

December 14, 2010

Dr. Stuart Rose, President and CEO  
Oso BioPharmaceutical Manufacturing, Inc.  
4401 Alexander Blvd.  
Albuquerque, NM 87107-6804

**Re: Industrial Storm Water, SIC 2834, NPDES Compliance Evaluation Inspection, Oso BioPharmaceutical Manufacturing, Inc., NMR05GI78, December 10, 2010**

Dear Dr. Rose,

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 your staff, Mr. Don Ewert, Mr. Paul Dombach and Mr. Josh Montano, 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 Bohling, USEPA (6EN-AS) via e-mail  
Samuel Bates, USEPA (6EN-AS) via e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail  
Diana McDonald, USEPA (6EN-WM) via e-mail  
Jennifer Ickes, NMED District I Manager (via e-mail)  
Kathy Verhage, City of Albuquerque DMD (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	I	7	8	11	12	1	0	1	2	1	0	17	18	~	19	S	20	2
Remarks																												
P H A R M A C E U T I C A L P R E P A R A T I O N S																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----												
67						70						71		72		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>OSO BIOPHARMACEUTICAL MANUFACTURING, INC; ALBUQUERQUE/BERNALILLO COUNTY. DIRECTIONS: FROM I-25, JEFFERSON EXIT AND HEAD WEST. FACILITY IS ON THE WEST SIDE OF JEFFERSON, JUST PAST SINGER RD.</b>	Entry Time /Date <b>0820 hours / 12-10-2010</b>	Permit Effective Date 9-30-2008
	Exit Time/Date <b>1150 hours / 12-10-2010</b>	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>MR. DON EWERT, EH&amp;S MANAGER (505) 923-1320 MR. PAUL DOMBACH, EH&amp;S TECHNICIAN (505) 923-1350 MR. JOSH MONTANO, EH&amp;S TECHNICIAN (505) 463-7253</b>	Other Facility Data N. 35° 7' 53.36" W. -106° 37' 9.46"	
Name, Address of Responsible Official/Title/Phone and Fax Number DR. STUART ROSE, PRESIDENT AND CEO (505) 923-2108 4401 ALEXANDER BLVD., ALBUQUERQUE, NM 87107	SIC: 2834	
Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *		

#### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	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	M	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

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

1. PLEASE SEE REPORT FOR FURTHER DETAILS.

Name(s) and Signature(s) of Inspector(s) <b>Sarah Holcomb /s/ Sarah Holcomb</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB 505-222-9587</b>	Date <b>12-14-2010</b>
Signature of Management QA Reviewer <b>Richard Powell /s/ Richard Powell</b>	Agency/Office/Phone and Fax Numbers <b>NMED/SWQB 505-827-2798</b>	Date <b>12-14-2010</b>

## NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>		<u>General</u>	
Inspection Type	CEI	Inspector Name	Sarah Holcomb
NPDES ID Number	NMR05GI78	Telephone	505-222-9587
Inspection Date	12-10-2010	Entry Time	0820 hours
Inspector Type <i>(circle one)</i>	EPA <input type="checkbox"/> State      EPA Oversight	Exit Time	1150 hours
Facility Sector/ SIC/Activity Code	Sector C / SIC: 2834	Signature	/s/ Sarah Holcomb

<u>Facility Location Information</u>			
Name/Location/ Mailing Address	Oso Biopharmaceuticals Manufacturing, Inc. Near Jefferson and I-25 in Albuquerque, NM Mailing address: 4401 Alexander Blvd. NE, Albuquerque, NM 87107-6804		
GPS Coordinates	Latitude	35° 7' 53.37"	Longitude
			-106° 37' 9.46"
Receiving Water(s)	Bear Canyon Arroyo and North Diversion Channel thence to Rio Grande in 20.6.4.106 NMAC		

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Oso Biopharmaceuticals Manufacturing Inc.	
Facility Contact	Mr. Don Ewert, EH&S Manager	505-923-1320
Authorized Official(s)	Mr. Stuart Rose, President and CEO	505-923-2108

<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 type="checkbox"/> N
Operational Date	1980		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	4-6-2009		SWPPP Date	9-1-2009	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Review</b>			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	Y	<input type="checkbox"/> N	
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"> <li>• Routine facility inspection (4.1.3)</li> <li>• Quarterly visual assessment (4.2.3)</li> <li>• Benchmark monitoring (6.2.1.3).</li> </ul>	Y	N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/> N	Certified Criterion A, but did not have supporting documentation.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input checked="" type="checkbox"/> N	No Historic Properties list was included in the SWPPP.
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"/> N	Mr. Ewert signed the SWPPP, but there was no authorization letter for him to do so.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			<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?	Y	<input checked="" type="checkbox"/>	
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?	<input checked="" type="checkbox"/>	N	
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?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	N/A – no spills or leaks have occurred according to facility representatives.
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	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/>	Chiller water is ponded on-site for evaporation (2 gal/day)

## 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>Yes</b></li> <li>• Locations used for the treatment, storage or disposal of wastes <b>Yes</b></li> <li>• Liquid storage tanks <b>Yes</b></li> <li>• Processing and storage areas <b>N/A</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>Yes</b></li> <li>• Transfer areas for substances in bulk <b>Yes</b></li> <li>• Machinery <b>N/A</b></li> </ul>	<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?	Y	N	N/A
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	<input checked="" type="checkbox"/>	Non-stormwater certification has not been done yet.
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?	Y	<input checked="" type="checkbox"/>	
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

## 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>	Y	<input type="checkbox"/> N	Facility representatives indicated that this will be done by the end of December.
Does salt storage occur at this facility?	<input checked="" type="checkbox"/> Y	N	Salt is stored completely indoors.
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	
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?	<input checked="" type="checkbox"/> Y	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"/> Y	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?	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?	<input checked="" type="checkbox"/> Y	N	Daily PM inspections are conducted (30 staff at this facility are charged with this responsibility).
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input type="checkbox"/> N	Should reference PM Manual that already exists.
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"/> 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?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/> Y	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	N	

## 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	
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	N	N/A
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
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	<input checked="" type="checkbox"/> Y	N	
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/> Y	N	Covered in EH&S training but not documented in the SWPPP.
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	Y	<input checked="" type="checkbox"/> N	Spill response only.
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	<input checked="" type="checkbox"/> N	The non-stormwater evaluation had not been conducted as of the date of this inspection.

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### Site Description:

Oso Biopharmaceutical Manufacturing Inc. prepares liquid pharmaceutical injectable drugs, such as chemotherapy drugs. The manufacturing, processing and packaging/shipping are all conducted indoors. There is some material storage that occurs outside, but it is all contained as to not be exposed to stormwater. Air chemicals that are stored outside are in locked lockers. Hazardous waste materials are stored in locked storage containers.

The facility was purchased from Catalent in 2008 and renamed Oso Biopharmaceuticals. Since then, the company has been working to get into compliance with the MSGP. There was an existing SWPPP from when the company was owned by a prior company (SP Pharmaceuticals) but the SWPPP that is in place now is much more detailed.

Mr. Ewert signed both the NOI and the SWPPP for the facility. The NOI must be signed by a corporate officer, as indicated in Appendix B.11. The authorization to sign the SWPPP and the inspection reports required by the SWPPP can be designated to another party. This designation must be made in writing by a person described in Appendix B.11. Please see Appendix B.11.B.1-3. Since the required officer did not sign the NOI, the facility has technically been without permit coverage this entire permit term. The facility should resubmit their NOI with the correct signature as soon as possible.

The SWPPP was not finalized until September of 2009. The NOI was submitted prior to that, in April 2009.

The NOI was certified under Criterion A for ESA purposes. There was not sufficient documentation to show beyond a doubt that there are no endangered species on this site. There was also no documentation to support the certification that the site was compliant with Historic Properties considerations.

Part 2.1.2.10 of the permit states: *You must eliminate non-stormwater discharges not authorized by an NPDES permit. See Part 1.1.3 for a list of non-stormwater discharges authorized by this permit.*

Part 1.1.3 details the non-stormwater discharges that are allowable by this permit.

The non-stormwater discharge evaluation required by Part 5.1.3.4 had not been performed as of the date of this inspection. This evaluation should include the date, a description of the evaluation criteria, a list of the outfalls or drainage points, the different types of non-stormwater discharges and source locations, and the actions taken.

The SWPPP in general needed to include more specific information as to procedures related to spill response and potential pollutants on site. The facility representatives indicated that they have an extensive Preventive Maintenance program, where inspections are conducted every day. They also have an extensive manual to accompany that PM program. This should be referenced in the SWPPP.

Routine facility inspections have not been conducted for this facility. Three quarterly visual assessments have been conducted (9-6-2009, 6-28-2010 and 9-23-2010), however, seven assessments should have been conducted as of the time of this inspection. The facility is eligible to submit an exception to allow them to collect their visual assessments for the year during the monsoon period, since New Mexico is subject to irregular storm events.

A comprehensive yearly inspection also had not been conducted as of the time of this inspection.

Aside from the non-stormwater discharges observed during the inspection, the facility generally appeared to have good measures implemented for storage, labeling and preventing material or process exposure to storm water.

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
<b>Routine Facility Inspections</b>			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	<input 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 type="checkbox"/> N	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>• Inactive and unstaffed sites</li> </ul>	Y	<input type="checkbox"/> N	
<b>Quarterly Visual Assessment</b>			
Are quarterly visual assessments conducted?	Y	<input type="checkbox"/> N	9-6-2009; 6-28-2010; 9-23-2010
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 type="checkbox"/> N	Not all of the samples were collected within the first 30 minutes of discharge.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>			
<p>Are assessments documented, including:</p> <ul style="list-style-type: none"> <li>• Sample location <b>Yes</b></li> <li>• Sample collection date/time &amp; visual assessment date/time <b>Yes</b></li> <li>• Personnel collecting sample &amp; performing assessment and their signature <b>Yes</b></li> <li>• Nature of the discharge (runoff or snowmelt) <b>Yes</b></li> <li>• Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) <b>Yes</b></li> <li>• Probable sources of contamination <b>Yes</b></li> <li>• If applicable, reason for not taking samples within 1<sup>st</sup> 30 minutes. <b>No</b></li> </ul>	<input checked="" type="checkbox"/>	N	No reason is given for samples that were not collected within the first 30 minutes of the rain event.
<p>Exceptions, including (see 4.2.3):</p> <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"/>	An exception for collecting all of the facility's samples during the monsoon period could be submitted. The facility struggled to collect a sample once/quarter as required.
<b>Comprehensive Site Inspections</b>			
Are comprehensive site inspections conducted annually (start 9/29/09)?	Y	<input checked="" type="checkbox"/>	
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	N	N/A
Cover all areas of the facility?	Y	N	N/A
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	N	N/A

## 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>	Y	N	N/A
<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	N	N/A

## 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?	Y	N	N/A SIC 2834 exempts this facility from collecting benchmark data.
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	ELG monitoring is not required at this facility.
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
<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>	Y	N	N/A
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring</b>			
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> <li>Make the necessary modifications</li> <li>Continue quarterly monitoring</li> <li>Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA</li> <li>Natural background pollutant level documentation</li> </ul>	Y	N	N/A
Exceptions, including (see 6.1 & 6.2): <ul style="list-style-type: none"> <li>Adverse weather conditions</li> <li>Climates with irregular storm water runoff</li> <li>Snowmelt</li> <li>Substantially identical outfalls (per 5.1.5.2)</li> <li>Inactive and unstaffed sites.</li> </ul>	Y	N	N/A
<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	N/A
<b>Other Required Monitoring</b>			
<ul style="list-style-type: none"> <li>State or Tribal provisions</li> <li>Discharges to impaired waters</li> <li>Additional monitoring required by EPA.</li> </ul>	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?	Y	N	N/A
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/>	No annual report was documented in the SWPPP or submitted to EPA.
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)

<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>All manufacturing and material processing operations are indoors. The only storage that occurs outdoors are the hazardous waste materials, regular trash and air chemicals stored outside in lockers.</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>All outdoor storage that occurs is properly labeled and stored so that it is not exposed to stormwater.</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>PM inspections are conducted on a daily basis. A separate manual exists to instruct staff on proper procedures for spill containment and clean up.</p>

## NPDES Industrial Storm Water Checklist (MSGP)

<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>These procedures are contained in the facility's PM manual.</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>N/A</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>A chiller water discharge was rerouted in the past year to be ponded onsite instead of being discharged to the MS4. There are two non-stormwater discharges from the facility as of this inspection that could also be managed the same way.</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>Salt is stored indoors.</p>

## NPDES Industrial Storm Water Checklist (MSGP)

<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>Compactors and trash collection does occur at the southeast corner of the manufacturing building.</p> <p>At the packaging and shipping building, the trash compactors did have some trash located under them that needed to be picked up.</p>
<b>Evidence of non-storm water discharges</b>	<p>One non-stormwater discharge comes from the lab building. It appears to be air conditioning condensate. This is discharged directly to the Bear Canyon Arroyo.</p> <p>The other non-stormwater discharge is from the fire suppressant system at the packaging and shipping facility on Alexander Blvd. The system failed a few weeks ago and is still leaking. This water travels across the parking lot and may eventually enter the North Diversion Channel.</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>N/A</p>

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Implementation and Sector Specific Requirements

**List and describe structural controls** (*The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications*)

**Aside** from the curb and gutter, the only structural control is located west of the manufacturing building. The refrigeration water has been redirected to a ponding area filled with rock.



Bear Canyon Arroyo

OsoBio Lab Building

Balloon Park Rd NE, Albuquerque, NM 87109

OsoBio Manufacturing Building



©2010 Google



IsoBio Packing/Shipping Building

Alexander Blvd NE, Albuquerque, NM

ABO North Diversion Channel

Google