



NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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BUTCH TONGATE
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TOM SKIBITSKI
Acting Director
Resource Protection Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 11, 2013

Mr. Manuel Arce, Plant Manager
FoamEx International, Inc.
2500 Airport Rd.
Santa Teresa, NM 88008

Re: Industrial Storm Water, SIC 3086, NPDES Compliance Evaluation Inspection, FoamEx International, Inc.,
NMR05GL84, January 29, 2013

Dear Mr. Arce,

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 Ms. Claudia Rodriguez 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: Hannah Branning, USEPA (6EN-AS) via email
Rashida Bowlin, USEPA (6EN-AS) via email
Carol Peters-Wagnon, USEPA (6EN-WM) via email
Diana McDonald, USEPA (6EN-WM) via email
NMED District III Manager, via email
Darlene Whitten-Hill, USEPA, via 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	L	8	4	11	12	1	3	0	1	2	9	17	18	~	19	S	20	2
Remarks																												
P L A S T I C S F O A M P R O D U C T S																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved												
67						70						71		72		74 75 80												

Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> FOAMEX INTERNATIONAL, INC., SANTA TERESA, DONA ANA COUNTY, NM: from I-10, travel into Texas, then back into NM. Take exit 8 to TX-178W. Travel about 4 miles to McNutt Rd., turn left. Travel one mile, turn right on Airport Rd. Facility is on the left.		Entry Time /Date 1115 hours / 1-29-2013	Permit Effective Date 9-29-2008
		Exit Time/Date 1355 hours / 1-29-2013	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Ms. Claudia Rodriguez, Regional EHS Manager, 575-874-5522 Mr. Manuel Arce, Plant Manager, 575-874-5557		Other Facility Data SIC: 3086	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Manual Arce, Plant Manager (575) 874-5557, marce@fxi.com 2500 Airport Rd., Santa Teresa, NM 88008		GSP: N. W. 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
S	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	S	Storm Water	N	Other:

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

- Inspector arrived at the facility at 1115 hours on January 29, 2013. An entrance interview was conducted with Ms. Claudia Rodriguez, Regional EHS Manager, where the inspector presented her credentials, made introductions and discussed the purpose of the inspection. An exit interview was conducted at the facility at approximately 1330-1355 hours with Ms. Rodriguez, and Mr. Manny Arce, Plant Manager, where the inspector presented the preliminary findings of the inspection.
- Please see report for further details.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 2-11-2013
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 2-11-2013

NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>			<u>General</u>	
Inspection Type	CEI		Inspector Name	Sarah Holcomb
NPDES ID Number	NMR05GL84		Telephone	505-222-9587
Inspection Date	1-29-2013		Entry Time	1115 hours
Inspector Type <i>(circle one)</i>	EPA	<input type="checkbox"/> State	Exit Time	1355 hours
Facility Sector/ SIC/Activity Code	Sector Y2 SIC 3086		Signature	/s/ Sarah Holcomb

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	FoamEx International, Inc. 2500 Airport Rd., Santa Teresa, NM 88008			
GPS Coordinates	Latitude	N. 31° 51' 44.92"	Longitude	W. -106° 41' 23.60"
Receiving Water(s)	Unnamed arroyos thence to the Rio Grande in segment 20.6.4.101 NMAC			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	FoamEx International, Inc.	
Facility Contact	Ms. Claudia Rodriguez, EHS Manager	575-874-5522
Authorized Official(s)	Mr. Manuel Arce, Plant Manager	575-874-5557

<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	<input checked="" type="checkbox"/> Y	N
Operational Date	1986		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	N
NOI/Application Date	7-20-09		SWPPP Date	10-31-11	
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	The inspector was unable to determine the date of the SWPPP. There had been a SWPPP in place since 1996, however.
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/> Y	N	
Copy of the permit language?	<input checked="" type="checkbox"/> Y	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	Y	N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	Y	<input type="checkbox"/> N	Inspector was unable to determine if SWPPP had been signed.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/> Y	N	
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/> N	Facility is 21.36 acres.
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	<input checked="" type="checkbox"/> N	Facility would discharge to unnamed arroyos in the area, thence to the Rio Grande.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<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"/> Y	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	N/A – according to facility representative, no significant spills/leaks have occurred.
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/> N	There is a routine discharge (once per week) of potable fire pump water. Not indicated on the map.
Does the site map contain locations of the following activities where these activities are exposed to precipitation?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
<ul style="list-style-type: none"> • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading/unloading areas • Locations used for the treatment, storage or disposal of wastes • Liquid storage tanks • Processing and storage areas • 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 • Transfer areas for substances in bulk • Machinery 			
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	Fire suppression pump testing needs to be added to SWPPP discussion.
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	According to the facility representative, no spills or leaks have occurred at the facility in the past three years.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> • Date • Description of evaluation criteria • List of the outfalls or onsite drainage points directly observed • Different types of non-storm water discharges and source locations • Actions taken such as a list of control measures for elimination. 	Y	<input checked="" type="checkbox"/> N	The documentation is in the SWPPP, but it was not signed on the day of this inspection.
Does salt storage occur at this facility?	Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	N/A
<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)

Controls to Reduce Pollutants			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	<input checked="" type="checkbox"/> Y	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	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<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?	<input checked="" type="checkbox"/> Y	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	Training is conducted annually.
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)

Controls to Reduce Pollutants		Notes:	
Does the SWPPP document erosion and sediment controls?	Y	<input type="checkbox"/> N	None are currently implemented.
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"/> Y	N	Runoff enters retention pond for settling prior to discharge.
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 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"/> Y	N	Annual training is required and documented.
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	Site was clean during this visit.
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?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

FoamEx International manufactures flexible polyurethane foam for use in multiple applications. The industrial processes are located indoors, and most of the storage also occurs indoors, although some minor materials are stored outside. The raw materials/chemicals are also delivered to the plant via semi-truck and/or rail spur.

Raw materials used for the foam production include polyols, Toluene Diisocyanate (TDI), tertiary aliphatic amine catalysts, silicone surfactants, tin catalysts, combustion modifying additives, dyes or pigments, and organic fillers. These materials are added together in appropriate concentrations on a conveyor slab and allowed to react together. The reaction takes approximately 2-4 minutes to occur. The resulting foam is cut into "buns" of 198 feet in length and are stored in a curing room to yield the final result. Then the buns are cut to customer specifications and shipped out.

The facility does have a retention pond onsite, which did not contain any water at the time of this inspection.

NPDES Industrial Storm Water Worksheet (MSGP)

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

NPDES Industrial Storm Water Worksheet (MSGP)

Inspections			
Are assessments documented, including: <ul style="list-style-type: none"> • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes. 	<input checked="" type="checkbox"/>	N	Visual assessment forms document the quality of the discharge well.
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites. 	Y	<input checked="" type="checkbox"/>	
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input checked="" type="checkbox"/>	N	Annual inspections were conducted on 10-23-09, 11-8-10, 11-2-11 and 11-8-12.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input checked="" type="checkbox"/>	N	
Cover all areas of the facility?	<input checked="" type="checkbox"/>	N	
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Worksheet (MSGP)

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

NPDES Industrial Storm Water Worksheet (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	N/A
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	N/A
Benchmark Monitoring			N/A
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling. 	Y	N	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 Worksheet (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> Make the necessary modifications Continue quarterly monitoring Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA Natural background pollutant level documentation 	Y	N	N/A
Exceptions, including (see 6.1 & 6.2): <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Snowmelt Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	Y	N	N/A
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	N/A
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	Y	N	N/A
Reporting (Part 7)			
<u>General</u>		Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	N/A
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	<input checked="" type="checkbox"/>	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 Worksheet (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	<p><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>Most manufacturing is located indoors. Shipping area is outdoors. Materials are received both by truck and by rail. Spill kits are located next to the materials receiving area.</p>
Good Housekeeping	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>Site is clean. Storage at the west end of the facility currently holds old parts that the facility is in the process of getting rid of. Please see Photo #1.</p>
Preventative maintenance	<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>Facility has one large retention pond that is regularly maintained. The site is sloped so that most runoff should enter this pond. There are no industrial processes outside, but spill kits are located directly next to the rail offloading area.</p>

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Two types of spill response kits (hazmat and regular spill containment) are located at the facility – please see Photo #3. Materials received are pumped directly from the truck and/or railcar via hose into an indoor tank farm.</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Some exposed soil is located on the north side of the facility. No erosion control implemented at source. The facility relies on the retention pond.</p>

NPDES Industrial Storm Water Worksheet (MSGP)

Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Generally stormwater is captured in ponds and rarely released from the site, according to the facility representatives.</p>
Salt Storage Piles	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>N/A</p>

SWPPP Implementation	
Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>The facility has a part time laborer who is hired specifically to pick up trash and to maintain the retention pond.</p>
Evidence of non-storm water discharges	<p>Fire pump flushing was being conducted at the time of this inspection. Water appeared to only puddle on the concrete.</p>
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Most of the semi-truck traffic is located on the paved side of the facility and offloading of materials is done indoors, so there is very little opportunity for tracking of materials offsite.</p>

NPDES Industrial Storm Water Worksheet (MSGP)

NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Sarah Holcomb	Date: 1-29-2013	Time: 1204 hours
City/County: Santa Teresa, Doña Ana County		
Location: FoamEx International, Inc., on Airport Rd.		
Subject: Old industrial materials stored outside, awaiting removal.		



NPDES Industrial Storm Water Worksheet (MSGP)

NMED/SWQB

Official Photograph Log

Photo # 2

Photographer: Sarah Holcomb	Date: 1-29-2013	Time: 1211 hours
City/County: Santa Teresa, Doña Ana County		
Location: FoamEx International, Inc., on Airport Rd.		
Subject: Railcar delivery area. Materials are offloaded via hose to the tank farm located in the building.		



NPDES Industrial Storm Water Worksheet (MSGP)

NMED/SWQB

Official Photograph Log

Photo # 3

Photographer: Sarah Holcomb	Date: 1-29-2013	Time: 1212 hours
City/County: Santa Teresa, Doña Ana County		
Location: FoamEx International, Inc., on Airport Rd.		
Subject: Spill kit located next to the railcar delivery area.		

