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Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARKLIN
Secretary

BUTCH TONGATE
Acting Deputy Secretary

Certified Mail - Return Receipt Requested

August 11, 2011

Lydia Gandara, Owner
Las Cruces Recycling
1961 Copper Loop
Las Cruces, NM 88007

RE: Industrial Stormwater; SIC 5093; NPDES Compliance Evaluation Inspection; Las Cruces Recycling; NPDES Permit No. NMR05GW82; July 26, 2011

Dear Mrs. Gandara:

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 your cooperation and assistance during this inspection. If you have any questions about this inspection report, please contact me at (505) 827-1041.

Sincerely,

Sandra Gabaldón
Surface Water Quality Bureau

Cc: Marcia Gail Adams, EPA, Enforcement Section (6EN-AS) by e-mail
Carol Peters-Wagnon, EPA (6EN-WM) by e-mail
Diana McDonald, EPA (6EN-WM) by e-mail
Samual Tates, EPA, (6W-AS) by e-mail

Addressee

Date

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NMED District III by e-mail



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 W 8 2 11 12 1 1 0 7 2 6 17 18 ~ 19 S 20 2					
Remarks					
R E C Y C L I N G					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 3	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) LAS CRUCES RECYCLING 1961 Copper Loop Las Cruces, NM 88007 DONA ANA COUNTY	Entry Time /Date 1440 Hours / 07-26-2011	Permit Effective Date 9-29-2008
	Exit Time/Date 1555 hours/ 07-26-2011	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Robert Gandara, Manager (505) 805-0093	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Lydia Gandara, Owner (505) 805-0093 LAS CRUCES RECYCLING 1961 Copper Loop Las Cruces, NM 88007	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	N. 32.18.324° W. -106.48.396° Sector N SIC 5093

Section C: Areas Evaluated During Inspection

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

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

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

1. PLEASE SEE FURTHER EXPLANATIONS FOR DETAILS

Name(s) and Signature(s) of Inspector(s) SANDRA GABALDON /s/ Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB 505-827-1041	Date August 11, 2011
Signature of Management QA Reviewer RICHARD E. POWELL /s/ Richard E. Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date August 11, 2011

NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>		<u>General</u>	
Inspection Type	Compliance Evaluation	Inspector Name	Sandra Gabaldon
NPDES ID Number	NMR05GW82	Telephone	(505) 827-1041
Inspection Date	July 26, 2011	Entry Time	1300 Hours
Inspector Type <i>(circle one)</i>	EPA <input type="checkbox"/> State EPA Oversight	Exit Time	1435 Hours
Facility Sector/ SIC/Activity Code	Sector N/SIC 5093	Signature	

<u>Facility Location Information</u>			
Name/Location/ Mailing Address	Las Cruces Recycling 1961 Copper Loop Las Cruces, NM 88005		
GPS Coordinates	Latitude	N. 32.18.324°	Longitude
			-106.48.396°
Receiving Water(s)	Las Cruces MS4, thence to the Rio Grande in Segment NMAC 20.6.4.101		

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Lydia Gandara, Owner	(575) 805-0093
Facility Contact	Robert Gandara	(575) 805-0093
Authorized Official(s)	Lydia Gandara, Owner	(575) 805-0093

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
Permit Coverage	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N		SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Permit Type	<input checked="" type="checkbox"/> General <input type="checkbox"/> Individual		SWPPP Contents Satisfactory	Y <input checked="" type="checkbox"/> N	
Operational Date	Aug. 2010		SWPPP Implementation Satisfactory	Y <input checked="" type="checkbox"/> N	
NOI/Application Date	03/23/10		SWPPP Date	03/01/2010	
If applicable, is no exposure certification on file?	Y <input type="checkbox"/> N		<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	SWPPP: March 1, 2010 NOI: March 23, 2010
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	
Copy of the permit language?	<input checked="" type="checkbox"/>	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input checked="" 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: <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	<input checked="" type="checkbox"/>	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	Criterion A. SWPPP provided a list of endangered species in area, but no explanation as to how no federally listed threatened or endangered species are likely to occur in the action area. .
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	<input checked="" type="checkbox"/>	N	
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/>	N	Signed by Lydia Gandara
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
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?	Y	<input checked="" type="checkbox"/>	No general location map provided in SWPPP.
Is there a site specific site map?	Y	<input checked="" type="checkbox"/>	No site specific map provided in SWPPP
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?	Y	<input checked="" type="checkbox"/>	
Does the site map contain directions of storm water flow (indicated by arrows)?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of all existing structural control measures?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/>	
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	<input checked="" type="checkbox"/>	
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	<input checked="" type="checkbox"/>	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of the following activities where these activities are exposed to precipitation?	Y	<input checked="" type="checkbox"/>	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			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	
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 provides a list of previous three years and states "no spills or leaks occurred". Signed by the owner, Lydia Gandara.

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 type="checkbox"/> N	Evaluation includes date, description of evaluation criteria, actions taken and different types of non-stormwater discharges and source locations. However, fails to provide a list of outfalls or onsite drainage points directly observed.
Does salt storage occur at this facility?	Y	N	N/A
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input type="checkbox"/> N	No sampling has been done.
<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?	Y	<input type="checkbox"/> N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	Y	<input type="checkbox"/> N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input 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 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?	Y	<input type="checkbox"/> N	SWPPP states regular disposal of waste and periodic inspections. There is no set schedule such as weekly, monthly or daily.
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?	Y	<input type="checkbox"/> N	SWPPP has a generic schedule rather than a set schedule such as daily, weekly or monthly.
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	During site visit, containers were not properly labeled.
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	No barriers in place between material storage and traffic areas. Vehicles have access to area and no secondary containment seen on site.
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	N	SWPPP provides procedures for expeditiously stopping, containing and cleaning up leaks, spills and other releases.
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?	Y	<input type="checkbox"/> N	The SWPPP provides an excellent list of training requirements, but there is no indication to suggest that anyone has received any training, such as a signatures or dates.
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	Documentation provided along with agency names and numbers.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants		Notes:	
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/>	N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	<input checked="" type="checkbox"/>	N	Structural concrete wall on the west side of property. Entire site is enclosed, except for the entrance, with a paneled fence. Possibility of seepage occurs underneath concrete wall and paneled fence.
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"/>	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/>	N	Training schedule provided, but no evidence to suggest that employees have received any training.
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	<input checked="" type="checkbox"/>	N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/>	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	<input checked="" type="checkbox"/>	SWPPP states sweeping will be done. However, onsite representative states that no sweeping has been done.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

The recycling yard is an enclosed, 1.0 acre area. The facility has various piles of recyclable material throughout the yard with no labeling, as suggested in the SWPPP. There is another area where fluids are removed from vehicles. There is noticeable staining on the ground from oils/grease. The receiving area has a concrete pad. There is a concrete retaining wall on the west side of the property. There are 55-gallon drums on the south side of the property with old oil and grease products which are unlabeled. The SWPPP states that areas will be labeled with signage as well as a sign at the entrance that provides the public with what is accepted at this recycling facility and what is not. No signage is visible other than the "Las Cruces Recycling" sign.

There was no topographical map or a site map provided in the SWPPP.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)		
<u>General</u>	Notes:	
Routine Facility Inspections		
Are routine facility inspections conducted at least quarterly while facility operating?	<input checked="" type="checkbox"/> Y	<input 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. 	Y	<input checked="" type="checkbox"/> N
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	<input type="checkbox"/> N
Quarterly Visual Assessment		
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"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container. 	Y	<input checked="" type="checkbox"/> N

NPDES Industrial Storm Water Checklist (MSGP)

Inspections		
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. 	Y	<input checked="" type="checkbox"/> N
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"/> N
Comprehensive Site Inspections		
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input checked="" type="checkbox"/> Y	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
No monitoring data available. No visual inspections performed.		

NPDES Industrial Storm Water Checklist (MSGP)

Inspections		
<p>Include observations of the following:</p> <ul style="list-style-type: none"> Industrial materials, residue, or trash that may have or could come into contact with storm water Leaks or spills from industrial equipment, drums, tanks, and other containers Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas Control measures needing replacement, maintenance, or repair All storm water control measures observed. 	Y	<input 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"/> Y	N

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	<input type="checkbox"/> N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	Effluent limitation guidelines are not required for Sector M or N.
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	<input type="checkbox"/> N	
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	<input type="checkbox"/> N	No samples taken
Benchmark Monitoring			No benchmark monitoring done. Sector M required benchmark monitoring includes: Total Suspended Solids; Total Aluminum; Total Iron, Total Lead. Sector N Required benchmark monitoring includes: Chemical Oxygen Demand, Total Suspended Solids, Total Recoverable Aluminum, Total Recoverable Copper, Total Recoverable Iron, Total Recoverable Lead, Total Recoverable Zinc.
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> Within the first 30 minutes of discharge On discharges that occur at least 72 hours (3 days) from the previous discharge Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall Prior to commingling. 	Y	<input type="checkbox"/> N	
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	<input type="checkbox"/> N	
Is the average of the first four quarterly samples < the parameter benchmark?	Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> Make the necessary modifications Continue quarterly monitoring Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA Natural background pollutant level documentation 	Y	<input checked="" type="checkbox"/> N	
Exceptions, including (see 6.1 & 6.2): <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Snowmelt Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	Y	<input checked="" type="checkbox"/> N	No exceptions provided in the SWPPP.
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	<input checked="" type="checkbox"/> N	
Reporting (Part 7)			
<u>General</u>	Notes:		
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	<input checked="" type="checkbox"/> N	
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	<input checked="" type="checkbox"/> Y	N	
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<p>Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff</p>	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>The site has an eastern concrete barrier wall in place along with a paneled fence along the perimeter of the property. No other methods implemented on site to maintain runoff/run-on. There is a possibility that runoff/run-on may escape property underneath the concrete wall as well as the paneled fence.</p>
<p>Good Housekeeping</p>	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>No sweeping done, no labels provided on containers.</p>
<p>Preventative maintenance</p>	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>Regular inspections are completed.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>No spills have been reported.</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>Structural concrete wall on west side of property. Site enclosed with paneled fencing.</p>
Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>No grassy swales seen on site, as suggested in the SWPPP.</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>

NPDES Industrial Storm Water Checklist (MSGP)

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 area has waste containers on site.</p>
Evidence of non-storm water discharges	<p>None.</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>No sweeping is done.</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)*

Concrete wall on west side of property.

Enclosed paneled fencing around property.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Sandra Gabaldón	Date: 07/26/2011	Time: 1344 hours
City/County: Las Cruces / Dona Ana County		State: New Mexico
Location: Las Cruces Recycling		
Subject: Used hydraulic fluid on northeast corner of property, placed on bare ground instead of concrete pad.		



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Sandra Gabaldón	Date: 07/26/2011	Time: 1348 hours
City/County: Las Cruces / Dona Ana County		State: New Mexico
Location: Las Cruces Recycling		
Subject: South end of property where used oil is kept on pallets. No secondary containment.		



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Sandra Gabaldón	Date: 07/26/2011	Time: 1349 hours
City/County: Las Cruces / Dona Ana County		State: New Mexico
Location: Las Cruces Recycling		
Subject: Facing southwest on property.		



NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Sandra Gabaldón	Date: 07/26/2011	Time: 1351 hours
City/County: Las Cruces / Dona Ana County		State: New Mexico
Location: Las Cruces Recycling		
Subject: Facing southwest on property.		

