



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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Deputy Secretary

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**Certified Mail - Return Receipt Requested**

December 21, 2011

Mr. Don Winters, President  
Constructors, Inc.  
3003 South Boyd Drive  
Carlsbad, New Mexico 88220

**RE: Industrial; Storm Water; SIC 1442; NPDES Compliance Evaluation Inspection; Roswell Ready Mix; Wash Plant; NMR05GW84; December 8, 2011**

Dear Mr. Winters:

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 and NMED regarding modifications and compliance schedules.

The NPDES Storm Water Multi-Sector General Permit for Industrial Activities (MSGP) was re-issued effective September 29, 2008 (see **Federal Register/Vol. 73, No. 189/Monday, September 29, 2008** pg. 56572). For questions regarding permitting please see: <http://cfpub.epa.gov/npdes/stormwater/msgp.cfm>

My thanks for the assistance and cooperation of your staff during the inspection. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 827-2798.

Sincerely,

*/s/ RICHARD E. POWELL*

Richard E. Powell  
Surface Water Quality Bureau

CC: Samuel Tate, USEPA (6EN-AS) by email  
Carol Peters-Wagnon, USEPA (6EN-WM) by email  
Marcia Gail Adams, USEPA (6EN-AS) by email  
Diana McDonald, USEPA (6EN-WM) by email  
Darlene Whitten-Hill, USEPA (6EN-WM) by e-mail  
NMED, District I Albuquerque by email  
Mr. Dennis Anez, Operations Manager by email



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

**NPDES Compliance Inspection Report**

**Section A: National Data System Coding**

Transaction Code			NPDES										yr/mo/day			Inspec. Type		Inspector		Fac Type									
1	N	2	5	3	N	M	R	0	5	G	W	8	4	11	12	1	1	1	2	0	8	17	18	~	19	S	20	2	
Remarks																													
S A N D & G R A V E L M I N E & P R O C E S S I N G																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67						70	3							71	N	72	N	73											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) CONSTRUCTORS, INC. DBA ROSWELL READY MIX/CRUSHER & WASH PLANT, 5400 SOUTH SUNSET, ROSWELL, NM	Entry Time /Date 1235/12-8-11	Permit Effective Date 9-29-08
	Exit Time/Date 1000/12-9-11	Permit Expiration Date 9-29-13
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) DENNIS ANEZ, OPERATIONS MANAGER 575-622-1186. 575-626-5701 (CELL) HOMER FLEMING, DRIVER 575-622-1186	Other Facility Data LAT 33 19 55 LONG -104 32 30 SIC 1442	
Name, Address of Responsible Official/Title/Phone and Fax Number DON WINTERS, PRESIDENT, CONSTRUCTORS, INC., 3003 SOUTH BOYD DRIVE, CARLSBAD, NM 88220 575-885-8838	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)

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

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

- FACILITY HAS APPLIED FOR AND RECEIVED REQUIRED NPDES PERMIT COVERAGE AND HAS PREPARED AND IMPLEMENTED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP). CONSTRUCTORS, INC. ACQUIRED ROSWELL READY MIX COMPANY IN APPROXIMATELY JUNE 2008.
- AN EXIT INTERVIEW TO DISCUSS THE PRELIMINARY FINDINGS OF THIS INSPECTION WAS CONDUCTED WITH MESSRS. ANEZ AND FLEMING FROM APPROXIMATELY 0910-0955 HOURS ON DECEMBER 8, 2011 AT THE ROSWELL READY MIX OFFICE.
- SEE REPORT AND FURTHER EXPLANATIONS.

/s/ RICHARD E. POWELL	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2798	Date December 21, 2011
Signature of Management QA Reviewer /s/ SARAH HOLCOMB	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-222-9587	Date December 21, 2011

## NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>			<u>General</u>	
Inspection Type	Compliance Evaluation		Inspector Name	Richard E. Powell
NPDES ID Number	NMR05GW84		Telephone	(505) 827-2798
Inspection Date	12/8&9/2011		Entry Time	1235/12-8-11
Inspector Type <i>(circle one)</i>	EPA	State	Exit Time	1000/12-9-11
Facility Sector/ SIC/Activity Code	J/1442 Sand & Gravel Mining		Signature	<i>/s/ RICHARD E. POWELL</i>

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	Roswell Ready Mix, 5400 South Sunset/4100 South Lea, Roswell, NM 88201			
GPS Coordinates	Latitude	33 19 55	Longitude	-104 32 30
Receiving Water(s)	Tributary to the Rio Hondo; thence to the Pecos River in Segment 20.6.4.206 NMAC of the Pecos River Basin			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Constructors, Inc. dba Roswell Ready Mix	
Facility Contact	Dennis Anez, Operations Manager Homer Fleming, Driver	575-622-1186
Authorized Official(s)	Don Winters, President Constructors, Inc. (signed NOI)	575-885-8838

<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	General	Individual	SWPPP Contents Satisfactory	Y	N
Operational Date	2003		SWPPP Implementation Satisfactory	Y	N
NOI/Application Date	3/24/2010		SWPPP Date	3/15/2010	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/>	N	
Copy of the permit language?	Y	<input checked="" type="checkbox"/>	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	<input checked="" type="checkbox"/>	
<p>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)?</p> <p>Applicable to:</p> <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	NA
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	N	NA
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	NOI says Criterion A. However, to be eligible under Criterion A, no federally-listed threatened or endangered species or their designated critical habitat are likely to occur in the "action area" as defined in Appendix A. Just discuss critical habitat. There are one or more endangered species in the Pecos River.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input checked="" type="checkbox"/>	NOI says Criterion B. No documentation.
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	NA
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/>	N	
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> 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	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	N	But not labeled on map.
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?	<input checked="" type="checkbox"/> Y	N	On general location map.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/> N	One ditch labeled.
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"/> N	On site map (aerial photograph) but not labeled.
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	None reported.
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/> N	None on map but SWPPP refers to outfall 001.
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"/> N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	NA
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	NA - wash plant to inactive pit that does not discharge.

## 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</b></li> <li>• Vehicle and equipment maintenance and/or cleaning areas <b>NA</b></li> <li>• Loading/unloading areas <b>N</b></li> <li>• Locations used for the treatment, storage or disposal of wastes <b>N</b></li> <li>• Liquid storage tanks <b>N</b></li> <li>• Processing and storage areas <b>N</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>N</b></li> <li>• Transfer areas for substances in bulk <b>N</b></li> <li>• Machinery <b>N</b></li> </ul>	<input checked="" type="checkbox"/>	N	Most things are shown of the aerial photograph site map but are not labeled.
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	None documented.
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	Y	<input checked="" type="checkbox"/>	Doesn't mention wash plant.
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	Y	<input checked="" type="checkbox"/>	Just dirt and various other materials but not TSS, TDS, etc.
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	No spills documented.

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> <li>• Date <b>N</b></li> <li>• Description of evaluation criteria <b>N</b></li> <li>• List of the outfalls or onsite drainage points directly observed <b>N</b></li> <li>• Different types of non-storm water discharges and source locations <b>N</b></li> <li>• Actions taken such as a list of control measures for elimination. <b>N</b></li> </ul>	Y	<input type="checkbox"/> N	Either did not do or did not document evaluation.
Does salt storage occur at this facility?	Y	<input type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	NA
<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	SWPPP lists all possible controls, nothing specific for this site.
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	Not documented.
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	Fuel storage is outdoors but in a double wall tank. Most other oils and fluids are stored indoors.
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)?	Y	<input type="checkbox"/> N	Generic list included but no list of specific activities at this site. List includes some activities that are done but includes several others that are not.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>		<b>Notes:</b>
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Just on a "regular basis."
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Facility does keep an electronic list of vehicle repairs. SWPPP includes a generic list mainly related to avoiding and clean-up of spills. Ditch, berm, etc. maintenance not addressed.
Does the SWPPP include a schedule for preventative maintenance procedures?	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	
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 <input type="checkbox"/> N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input checked="" type="checkbox"/> 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 <input type="checkbox"/> N	Most containers are indoors.
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Nothing documented.
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 <input checked="" type="checkbox"/>	No training documented.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Nothing documented.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP document erosion and sediment controls?	Y	<input type="checkbox"/> N	SWPPP lists all possible controls, nothing specific for this site.
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	Y	<input type="checkbox"/> N	Much of site is active but many areas could be stabilized. However, there is no reclamation/grading & re-vegetation plan in the SWPPP or implemented.
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	NA
Employee Training – is there a schedule for regular (at least annually) employee training?	<input type="checkbox"/> Y	N	SWPPP says annual with updates “as necessary” but none 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?	Y	<input type="checkbox"/> N	No training documented. Training list in SWPPP is basically only spill handling.
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 type="checkbox"/> Y	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input type="checkbox"/> Y	N	Water spray on roads and piles.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input type="checkbox"/> Y	N	Plant wash water to inactive, no discharge pit. Dust suppression water evaporates.

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### **Site Description:**

This site has been operated since 2003 by Roswell Ready Mix Company, which was acquired by Constructors, Inc. in 2008. The operator conducts construction sand and gravel crushing, sizing, and washing at this facility. Aggregate is sold in pit run and/or crushed and sized for construction related uses or is used offsite in the manufacture of ready mix concrete or onsite in the manufacture of asphalt. Plant wash water and other process wastewaters from these activities appear to be discharged to a large, abandoned quarry pit. According to the facility's representatives, this pit does not discharge.

The SWPPP for this site is based on EPA's MSGP SWPPP template with little change to incorporate specific, site-specific practices, including a reclamation plan. This generic plan generally includes virtually all possible controls and practices rather than specific ones to be implemented at this site. The MSGP requires that a complete, accurate and site-specific SWPPP be prepared and implemented.

Although drainage from much of this site is contained by pits and earthen berms, there appears to be the potential for discharge in the area of the access road, some disturbed areas south of the access road, via a ditch running south from the abandoned pit area by the access road and possibly from areas where berms are missing or need maintenance.

## 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?	<input checked="" type="checkbox"/> Y	N	
Are inspections documented, including: <ul style="list-style-type: none"> <li>• Date and time <b>Y</b></li> <li>• Name and signature of inspector <b>Y</b></li> <li>• Weather information and a description of discharge occurring at the time of the inspection <b>Y</b></li> <li>• Previously unidentified discharges from site <b>NA</b></li> <li>• Control measures needing maintenance or repairs <b>None noted</b></li> <li>• Failed control measures that need replacement <b>None noted</b></li> <li>• Incidents of noncompliance observed <b>None noted</b></li> <li>• Additional control measures needed. <b>None noted</b></li> </ul>	<input checked="" type="checkbox"/> Y	N	However, generally the reports indicate that everything is satisfactory even some items not located at this site such as rip rap retaining walls, straw bale barriers and equipment washing.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>• Inactive and unstaffed sites</li> </ul>	Y	N	NA
<b>Quarterly Visual Assessment</b>			
Are quarterly visual assessments conducted?	Y	<input checked="" type="checkbox"/> N	None done/documented.
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	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>			
Are assessments documented, including: <ul style="list-style-type: none"> <li>• Sample location</li> <li>• Sample collection date/time &amp; visual assessment date/time</li> <li>• Personnel collecting sample &amp; performing assessment and their signature</li> <li>• Nature of the discharge (runoff or snowmelt)</li> <li>• Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators)</li> <li>• Probable sources of contamination</li> <li>• If applicable, reason for not taking samples within 1<sup>st</sup> 30 minutes.</li> </ul>	Y	N	
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> <li>• Adverse weather conditions</li> <li>• Climates with irregular storm water runoff</li> <li>• Areas subject to snow</li> <li>• Substantially identical outfalls (per 5.1.5.2)</li> <li>• Inactive and unstaffed sites.</li> </ul>	Y	<input checked="" type="checkbox"/> N	Although this facility would likely be eligible for the irregular rainfall exception, the operator apparently does not document the use of this exception. Although rainfall has been limited in this area since permit coverage was granted, it seems inconceivable that no discharge has occurred. See above.
<b>Comprehensive Site Inspections</b>			None done/documentated.
Are comprehensive site inspections conducted annually (start 9/29/09)?	Y	<input checked="" type="checkbox"/> N	
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	N	
Cover all areas of the facility?	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	N	

## NPDES Industrial Storm Water Checklist (MSGP)

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

## NPDES Industrial Storm Water Checklist (MSGP)

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

## 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	NA
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	<input checked="" type="checkbox"/> N	
<b>Effluent Limitations Monitoring</b>			
Sampled once per year?	Y	N	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
<b>Other Required Monitoring</b>			
<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	<input checked="" type="checkbox"/> N	
<b>Reporting (Part 7)</b>			
<u>General</u>		Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	<input checked="" type="checkbox"/> N	No benchmark monitoring done/documentated.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/> N	None done/documentated.
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	NA

## 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>Fuel storage is outdoors but in a double wall tank. Most other oils and fluids are stored indoors. This is an active mining and processing, and asphalt manufacturing facility so there is a limited potential to minimize exposure.</p> <p>Vehicle maintenance, except mobile contracted fueling, is generally performed offsite.</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>Little trash and debris evident on the date of this inspection.</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>Facility keeps an electronic list of vehicle repairs. SWPPP includes a generic list of activities mainly related to avoiding and clean-up of spills. Some ditches, berms, etc. appear to be in need of maintenance.</p>

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<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>The outdoor fuel tank is in a double walled tank. There is little evidence of spills at the site.</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>There is very little attempt to control erosion at this site. Much of site is active but many areas could be stabilized. However, there is no reclamation/grading &amp; re-vegetation plan in the SWPPP or implemented.</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>As above, some ditches, berms, etc. appear to be in need of maintenance but runoff from much of the site appears to be generally well controlled using berms and retention ponds/pits.</p>
<b>Salt Storage Piles</b>	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>No salt storage onsite.</p>

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<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>Little litter in evidence on the date of this inspection.</p>
<b>Evidence of non-storm water discharges</b>	<p>None observed. Plant wash water discharges to an inactive, no-discharge pit. Dust suppression water evaporates according to the facility's representatives.</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>Facility uses a water truck to control dust. There was minimal evidence of offsite tracking on the date of this inspection.</p>

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

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

Sector J specific requirements for the areas covered under the MSGP are addressed above. The lack of a reclamation/grading & revegetation plan is a major omission in this Sector J facility's SWPPP. The SWPPP needs to better justify that controls suggested in Part 8.J.6 have been considered.