NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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

SUSANA MARTINEZ
Governor
JOHN SANCHEZ
Lieutenant Governor

DAVE MARTIN
Secretary
RAJ SOLOMON, P.E.
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 2, 2011

Ms. Elisa M. Speranza
CH2M Hill OMI, President
9193 S. Jamaica St. Suite 400
Englewood, CO 80112

Re: Industrial Storm Water; SIC 4952; NPDES; Compliance Evaluation Inspection; NMR05GX03; February 17, 2011

Dear Ms. Speranza,

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report and required to correct any problems noted during the inspection and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify, in writing, both USEPA (Marcia Adams, USEPA (6EN-WC), 1445 Ross Ave., Dallas, Texas 75202) and NMED (at above address) regarding modifications and compliance schedules.

The NPDES Storm Water Multi-Sector General Permit for Industrial Activities (MSGP-2008) was reissued on September 29, 2008. The MSGP, fact sheet and other information on the industrial storm water program can be downloaded at http://cfpub2.epa.gov/npdes/stormwater/msgp.cfm.

If you have any questions about this inspection report, please contact me at (505) 827-2575.

Sincerely,

/s/Daniel Valenta
Daniel Valenta
Environmental Scientist/Specialist
Surface Water Quality Bureau

cc: Marcia Adams, USEPA (6EN-AS) by e-mail
Samuel Tates, USEPA (6SF) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
NMED District II, by e-mail
Jeff Burkett, Project Manager II, 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 X 0 3 11 12	1 1 0 2 1 7 17 18	~ 19	S 20	2

Remarks

W A S T E W A T E R T R E A T M E N T P L A N T

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 2	71 N 72	N 73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
Taos WWTP, Taos County, 182 Los Cordovas Road, Taos, NM 87557 – From State Rd 68 entering Taos turn north on Los Cordova's Road, travel north approximately 2.5 miles. WWTP can be seen from the road.	**1018 hours/2-17-2011**	**September 29, 2008**
	Exit Time/Date **1320 hours/2-17-2011**	Permit Expiration Date **September 29, 2013**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Mr. Jeff Burkett/Project Manager II/575-758-8401

Name, Address of Responsible Official/Title/Phone and Fax Number

Ms. Elisa M. Speranza, 9193 S. Jamaica St. Suite 400, Englewood, CO 80112
CH2M Hill OMI President/ 303-740-0019

Contacted: Yes [ ] No [*]

Other Facility Data

GPS:
N. 36° 22' 24.21"
W. -105° 39' 21.38"

SIC: 5952
Activity code: TW

Section C: Areas Evaluated During Inspection

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

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

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

1. **Owner of facility, Town of Taos, does not have permit coverage.**
2. **Contract operators, CH2MHILL, may not have a valid permit, below.**

*** NOI for CH2MHill was signed/certified by employee from the Town of Taos. Town of Taos is not authorized to sign permit applications for CH2MHill, see notes on SWPPP review.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Daniel Valenta ***/s/Daniel Valenta***	**NMED/SWQB/505-827-2575**	**3/2/2011**
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Richard E. Powell ***/s/Richard Powell***	**NMED/SWQB/505-827-2798**	**3/2/2011**

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information			
Inspection Type	Compliance Evaluation		
NPDES ID Number	NMR05GX03/NMU001712		
Inspection Date	2/17/2011		
Inspector Type *(circle one)*	EPA	[State]	EPA Oversight
Facility Sector/ SIC/Activity Code	Treatment Works/WWTP/4952		

General	
Inspector Name	Daniel Valenta
Telephone	505-827-2575
Entry Time	1018
Exit Time	1320
Signature	

Facility Location Information				
Name/Location/ Mailing Address	Town of Taos Wastewater Treatment Plant 182 Los Cordovas Road Taos, NM 87557			
GPS Coordinates	Latitude	36° 22' 24.21" N	Longitude	105° 39' 21.38" W
Receiving Water(s)	Rio Pueblo de Taos in 20.6.4.122 of the Rio Grande Basin			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Owner - Town of Taos Contractor Operator – CH2MHILL	575-751-2047 575-758-8401
Facility Contact	Amos Torres – Public Utilities Director Jeff Burkett – Project Manager II	575-751-2047 575-758-8401
Authorized Official(s)	Gus Cordova – Town Manager Elisa Speranza – CH2M Hill OMI President	575-751-2000 303-740-0019

Basic Permit Information		
Permit Coverage	[Y] CH2MHill ?	[N] Town of Taos
Permit Type	[General]	Individual
Operational Date	1974	
NOI/Application Date	3/26/2010	none
If applicable, is no exposure certification on file?	Y	[N]

Basic SWPPP Information		
SWPPP Prepared & Available	[Y]	N
SWPPP Contents Satisfactory	Y	[N]
SWPPP Implementation Satisfactory	Y	[N]
SWPPP Date	2/20/2010	
Intentionally left blank		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General			**Notes:**
Was the SWPPP completed prior to NOI submission?	Y	N	
Copy of the NOI and acknowledgment letter from EPA?	Y	N	No acknowledgment letter from EPA.
Copy of the permit language?	Y	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	N	No coverage under expired permit.
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3).	Y	N	N/A, facility active 24/7.
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	N	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	N	Endangered species documentation provided. Criterion B selected.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	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	N	SWPPP not signed by authorized official.
Is the storm water pollution prevention team identified (name or title)?	Y	N	
Are the storm water pollution prevention team’s responsibilities identified?	Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	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?	Y	N	Map does not show location of facility or receiving stream.
Is there a site specific site map?	Y	N	
Does the site map contain the size of the property in acres?	Y	N	Size not on site map, in narrative under site description.
Does the site map contain the location and extent of significant structures and impervious surfaces?	Y	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	Y	N	Arrows only show flow on the paved surfaces.
Does the site map contain locations of all existing structural control measures?	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	N	Receiving stream TMDL status not described on map, TMDL for sedimentation/siltation and temperature.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	N	BMP's described in SWPPP not on site map.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	Y	N	Outside tanks of phosphoric and sulfuric acid not identified on map.
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	SWPPP reports no significant spills or leaks have occurred.
Does the site map contain locations of all storm water monitoring points?	Y	N	Outfall monitoring locations not noted.
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	N	Outfall monitoring locations not noted or given a unique identification.
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	N	No non-storm water sources described or noted.

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the site map contain locations of the following activities where these activities are exposed to precipitation? • 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	Y	N	Outside tanks of phosphoric and sulfuric acid not identified on map. Map details the other noted items.
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	No areas of run-on noted on map.
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	N	SWPPP documents areas where industrial materials or activities are exposed to storm water and the discharge of treated effluent under another permit.
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	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	Y	N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	SWPPP does not document any spills or leaks.

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			**Notes:**
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: • 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	N	
Does salt storage occur at this facility?	Y	N	Stored indoors, deicer salt.
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	No documentation of coverage under the 2000 permit.

Controls to Reduce Pollutants			**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	N	Use of swales and berms noted in SWPPP.
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	N	No documentation on why certain BMP's were used.
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	Y	N	Detailed description of activities and methods of minimizing exposure of storm water to pollutants. .
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	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	[N]	Describes routine monthly/quarterly inspections of site.
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]	N	Activities described in SWPPP.
Does the SWPPP include a schedule for preventative maintenance procedures?	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?	[Y]	N	SWPPP describes inspection and maintenance of all storage tanks and procedures should a spill occur.
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]	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	[Y]	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	[Y]	N	SWPPP describes procedures for controlling, cleaning, and checking for spills or 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]	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	[Y]	N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	Y	[N]	No see photos 1-3.
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	[N]	
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	Deicing salt stored indoors.
Employee Training – is there a schedule for regular (at least annually) employee training?	[Y]	N	
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	[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?	[Y]	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	[Y]	N	Periodic cleaning of paved areas removes dust, gravel, accumulated dirt and debris.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Introductions:

On February 17, 2011 a Compliance Evaluation Inspection was conducted at the Town of Taos Waste Water Treatment Plant (WWTP) by Daniel Valenta of the State of New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the operator's status regarding the NPDES multi-sector general storm water permit (MSGP) for industrial activities. This facility has industrial activities being conducted on-site that meet the description of industrial activities in Sector T of the MSGP and storm water regulations at **40 Code of Federal Regulations (CFR) Part 122.26.**

An entrance interview was conducted with Mr. Jeff Burkett, Project Manager II, at approximately 1018 hours on February 17, 2011. The inspector made introductions, presented his credentials and discussed the purpose of the inspection. No SWPPP was present at the facility so a call was placed to Mr. Dane Higden, SWPPP Manager. Mr. Higden was able to e-mail a copy of the SWPPP to the facility for review. An exit interview to discuss the preliminary findings of this inspection was conducted at approximately 1310 hours on February 17, 2011 with Mr. Burkett and by phone with Mr. Amos Torres, Public Utilities Director. This report is based on a review of the files maintained by the permittee and NMED, on-site observation by NMED personnel and verbal information provided by Mr. Burkett and Mr. Higden.

Site Description:

The Taos Wastewater Treatment Plant is a Publically Owned Treatment Works (POTW) which operates under the Region 6 EPA NPDES Permit No. NM0024066. The 3.5 acre facility discharges over 1 million gallons day (MGD) and is classified as a major. The treatment works presently consists of headworks, two oxidation ditches, four clarifiers, and UV disinfection. The biosolids from the facility are removed by a Gravity Belt Thickener (GBT) and the solid materials disposed of in a land fill which has the ability and license to accept special waste. Construction has begun on a Membrane Bio-Reactor (MBR) which will be in the southwest corner of the property.

Major Finding:

1. According to the facility's representatives and based on a review of the EPA storm water permit database, it has been determined that neither the owner nor the general contractor of this Waste Water Treatment Plant (WWTP) had NPDES industrial storm water permit coverage on the date of this inspection. The Town of Taos is the owner of this facility and has operational control over project specifications and possibly other activities, and CH2MHILL is the contractor who has day-to-day operational control over activities at the facility, which are necessary to ensure compliance with the SWPPP and other permit conditions. Mr. Amos Torres, Public Utilities Director, signed and certified an NOI for CH2MHILLon March 26, 2010 (effective May 25, 2010) and was issued permit reference number NMR05GX03. The Town of Taos Public Utilities Director does not have the authority to sign and certify a permit for CH2MHILL. The MSGP Appendix B.11.A.1 states: **"***For a corporation: By a responsible corporate officer. For the purpose of this subsection, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations*;"

Penalties for falsification of documents can be severe. MSGP Appendix B.11.F states: *The CWA provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.*

2. The SWPPP identified the facility as not discharging. Multiple locations discharge beyond the fenced area of the facility beside public roads, (see photo 1-3). The site map found in the SWPPP identified the fence as the border of the facility with no BMP's beyond fence although there is some discussion in the SWPPP of BMP's located just outside the fence.

3. The different discharge outfalls are not identified and given a unique label. SWPPP does not address in the sampling plan how the different outfalls will be sampled. If one outfall is to be used what is the reasoning to suggest it is representative of the other outfalls.

4. The NOI for CH2MHILL was submitted on 3/26/2010 (effective May 25, 2010). Since then no Quarterly Routine Facility Inspections or Quarterly Visual Assessments were documented. On June 8, 2010 the Taos airport reported a rain event of 2.29 inches. http://www.wunderground.com/history/airport/KSKX/2010/6/1/MonthlyHistory.html#calendar. A 2010 Annual Report was completed on 10/12/2010, it is unknown if the report was submitted to the EPA.

5. NOI submitted did not disclose the TMDL for sedimentation/siltation in the receiving stream.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
General			**Notes:**
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	N	NOI for CH2MHILL filed on 3/26/10 (effective 5/25/10).
Are inspections documented, including: • 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	N	No routine quarterly inspections performed.
Exceptions, including (see 4.1.3): • Inactive and unstaffed sites	Y	N	N/A
Quarterly Visual Assessment			.
Are quarterly visual assessments conducted?	Y	N	NOI for CH2MHILL filed on 3/26/10 (effective 5/25/10).
Does the assessment consist of a sample collected: • 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	N	No samples collected. On 6/8/10 the Taos area reported a rain event of 2.29 inches.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: • 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	N	No documentation of samples collected.
Exceptions, including (see 4.2.3): • 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	N	N/A
Comprehensive Site Inspections			.
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	N	NOI for CH2MHILL filed on 3/26/10, effective 5/25/10. Annual Inspection conducted on 10/12/2010.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	N	Conducted by Project Manager, Jeff Burdett.
Cover all areas of the facility?	Y	N	Unknown, areas detailed are fuel depot and acid storage containment area.
Include a review of monitoring data? Do inspections consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	Y	N	No quarterly inspection reports to review.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Include observations of the following: • 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	N	Annual report only detailed fuel depot and acid storage containment area. No quarterly inspection reports to review.
Are inspections documented, including: • 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	Y	N	Annual Inspection report has required details of observations of fuel depot and acid storage containment area. No quarterly inspection reports to review.

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
General			**Notes:**
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	Unknown, no samples ever taken.
Benchmark Monitoring			
Does the monitoring consist of a sample collected: • 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	Information on NOI did not disclose the TMDL for sedimentation/siltation. Therefore EPA specifications on which pollutant to monitor may have been incomplete, per 6.2.4.2.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	Unknown, no monitoring has occurred.

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? • Make the necessary modifications • Continue quarterly monitoring • Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA • Natural background pollutant level documentation	Y	N	N/A
Exceptions, including (see 6.1 & 6.2): • Adverse weather conditions • Climates with irregular storm water runoff • Snowmelt • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites.	Y	N	
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
Other Required Monitoring			
• State or Tribal provisions • Discharges to impaired waters • Additional monitoring required by EPA.	Y	N	Unknown, no monitoring has occurred.

Reporting (Part 7)			
General			**Notes:**
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	No monitoring sample collection documented.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	N	Annual Report completed on 10/12/2010, no documentation of report being submitted.
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	No monitoring sample collection documented.

NPDES Industrial Storm Water Checklist (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	*(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*) Treatment works are outdoors, belt press for sludge is enclosed.
Good Housekeeping	*(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)* Good housekeeping procedures are addressed in the SWPPP, site appeared orderly and well maintained.
Preventative maintenance	*(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)* Maintenance of plant equipment is preformed in the facilities shop building. The floors have drains back to the treatment process. Washing of equipment is preformed in areas that have drains to capture the water and return it of the treatment process. No back-up practices were addressed should a runoff event occur while a control measure is off-line.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	*(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)* External oil and acid storage areas have secondary containment in place and do not drain outside of containment. Oils, petroleum products, fertilizers, and herbicides are kept in the shop area in appropriate containers. The only petroleum product that is stored outside the shop area is diesel fueling. The facility has SOP in place if a spill should occur; dry oil absorbent material is available. The facility has posted emergency contact information if needed.
Erosion and Sediment Controls	*(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)* Vegetation and gravel cover the majority of site.
Management of Runoff	*(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)* SWPPP describes the facility as a no discharge site. On the north and east side of the facility a bar ditch and low area along the public road is described as a BMP. At the south and west side of the facility the new MBR is under construction, Construction General Permit (CGP) NMR10GV96. The ground slopes toward arroyos that run along these two sides. It may prove a challenge for the facility to address storm water issues along these sides once construction is completed.
Salt Storage Piles	*(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)* Deicing salt stored indoors.

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Waste, Garbage and Floatable Debris	*(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)* The site was orderly and maintained.
Evidence of non-storm water discharges	No evidence of non-storm discharges.
Dust Generation and Vehicle Tracking of Industrial Materials	*(minimize generation of dust and off-site tracking of raw, final, or waste materials)* Facility driveways are paved with the majority of site covered with gravel/vegetation.

NMED/SWQB
Official Photograph

Photo 1

Photographer: Daniel Valenta	Date: 2/17/2011	Time: 1214 hours
City/County: Taos/Taos County		
Location: Town of Taos WWTP, 182 Los Cordovas Road, southeast side of property facing south.		
Subject: Ground slopes away from treatment tanks to the east fence, no BMP's in place.		

NMED/SWQB
Official Photograph

Photo 2

Photographer: Daniel Valenta	Date: 2/17/2011	Time: 1231 hours
City/County: Taos/Taos County		
Location: Town of Taos WWTP, 182 Los Cordovas Road, north side of property facing northeast.		
Subject: Melting snow flows to facility fence and roadside, no BMP's in place.		

Photo 3

Photographer: Daniel Valenta	Date: 2/17/2011	Time: 1236 hours
City/County: Taos/Taos County		
Location: Town of Taos WWTP, 182 Los Cordovas Road, northeast side of property facing northeast.		
Subject: Erosion down cutting from rain downspout and surface flows discharging to bar ditch along public road.		