



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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DAVE MARTIN  
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RAJ SOLOMON, P.E.  
Deputy Secretary

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**Certified Mail - Return Receipt Requested**

May 2, 2011

Ms. Jeannie Burson  
Highway 64 Truck & Auto Salvage  
P.O. Box 1687  
Farmington, New Mexico 87499

**RE: Industrial; Storm Water; SIC 5015; NPDES Compliance Evaluation Inspection; Highway 64 Truck & Auto Salvage; NMR05GZ85; April 19, 2011**

Dear Ms. Burson:

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 your assistance and cooperation 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  
NMED, District I Albuquerque 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 Z 8 5 11 12 1 1 0 4 1 9 17 18 ~ 19 S 20 2					
Remarks					
A U T O S A L V A G E					
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) HIGHWAY 64 TRUCK & AUTO SALVAGE, 4551 HIGHWAY 64, KIRTLAND, NM, WEST OF FARMINGTON ON SOUTH SIDE OF US 64 SAN JUAN COUNTY	Entry Time /Date 1300/4-19-11	Permit Effective Date 9-29-08
	Exit Time/Date 1625/4-19-11	Permit Expiration Date 9-29-13
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) CHAD BURSON, MANAGER (505) 598-5584	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number JEANNIE BURSON OWNER, HIGHWAY 64 TRUCK & AUTO SALVAGE, PO BOX 1687, FARMINGTON, NM 87499 (505) 598-5584	LAT 36 44 03.4 LONG -108 17 59.0 SIC 5015	
Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

#### Section C: Areas Evaluated During Inspection

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

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	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).
- AN EXIT INTERVIEW TO DISCUSS THE PRELIMINARY FINDINGS OF THIS INSPECTION WAS CONDUCTED WITH JEANNIE AND CHAD BURSON FROM APPROXIMATELY 1555 - 1625 HOURS ON APRIL 19, 2011 AT THE SITE.
- SEE REPORT AND FURTHER EXPLANATIONS.

/s/ RICHARD E. POWELL	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2798	Date 5-2-11
Signature of Management QA Reviewer /s/ STEVEN M. BAUMGARN	Agency/Office/Phone and Fax Numbers NMED/SWQB 575-647-7981	Date 5-2-11

## 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	NMR05GZ85		Telephone	(505) 827-2798
Inspection Date	4/19/2011		Entry Time	1300/4-19-11
Inspector Type <i>(circle one)</i>	EPA	State	Exit Time	1625/4-19-11
Facility Sector/ SIC/Activity Code	M/5015		Signature	<i>/s/ RICHARD E. POWELL</i>

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	Highway 64 Truck & Auto Salvage, 4551 Highway 64, Kirtland, NM 87417			
GPS Coordinates	Latitude	36 44 03.4	Longitude	-108 17 59.0
Receiving Water(s)	Locke Arroyo; thence to the San Juan River in Segment 20.6.4.401 NMAC of the San Juan Basin			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Highway 64 Truck & Auto Salvage	
Facility Contact	Chad Burson, Manager	505-598-5584
Authorized Official(s)	Daryl & Jeannie Burson, Owners	505-598-5584

<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	May 2010		SWPPP Implementation Satisfactory	Y	N
NOI/Application Date	5-27-2010		SWPPP Date	May 2010	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Review</b>			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	
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	
<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. Several federally listed endangered species are known to occur in or near the project site.
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)?	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"/>	N	Dismantle 2-3 vehicles/day, inventory 4000 vehicles, crushing area.
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/>	N	
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/>	44 acres listed in SWPPP.
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/>	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/>	N	But may need to update map to incorporate planned changes.
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"/>	On general location map.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input checked="" type="checkbox"/>	N	
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?	<input checked="" type="checkbox"/>	N	But outfall structures have not been constructed.
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input checked="" type="checkbox"/>	N	But outfall structures have not been constructed.
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

## 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>Y</b></li> <li>• Vehicle and equipment maintenance and/or cleaning areas <b>Y</b></li> <li>• Loading/unloading areas <b>Y</b></li> <li>• Locations used for the treatment, storage or disposal of wastes <b>Y</b></li> <li>• Liquid storage tanks <b>Y</b></li> <li>• Processing and storage areas <b>Y</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>Y</b></li> <li>• Transfer areas for substances in bulk <b>NA</b></li> <li>• Machinery <b>Y</b></li> </ul>	<input checked="" type="checkbox"/>	N	
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	N	No significant sources.
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	Minor AC condensate is unlikely to discharge.
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/>	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"/>	N	No larger spills documented. Facility should keep a log of all spills except in incidental amounts.

## 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>May 2010</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>Y</b></li> <li>• Actions taken such as a list of control measures for elimination. <b>NA</b></li> </ul>	<input checked="" type="checkbox"/>	N	Minor AC condensate.
Does salt storage occur at this facility?	Y	<input type="checkbox"/>	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	NA – No previous permit coverage.
<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"/>	Only berms currently but SWPPP says "Drainage plan" including retention/evaporation ponds in design phase.
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"/>	
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"/>	N	Dismantling mostly 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"/>	Nothing in the SWPPP concerning containers and labeling.

## 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	Yes for waste disposal but only "on a regular basis" for containers.
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	Mostly addresses equipment maintenance. Structural BMPs only "maintained & routinely inspected."
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/> Y	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP document erosion and sediment controls?	Y	<input 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?	Y	<input type="checkbox"/> N	Just use berms for erosion control. SWPPP says "Drainage plan" including retention/evaporation ponds in design phase.
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	NA - Outfalls identified in SWPPP have not been constructed yet.
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 checked="" type="checkbox"/> 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?	<input checked="" type="checkbox"/> Y	N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	<input type="checkbox"/> N	Only minor AC condensate.

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### **Site Description:**

The operator of this facility moved from another site located to the west of the current location. The previous site also has coverage under the MSGP (NMR05GC57). Construction activities for the current site are covered under the NPDES Construction General Permit (NMR10H512). The current site was created by flattening areas on top of a mesa as well as creating several terraces on the slope to the bottom of the mesa. Several thousand vehicles are stored on the top and terraces awaiting dismantling and/or crushing. The proposed crusher site is located on the lowest level.

Each of the terraces is bermed along the outer edge but very long, steep slopes have not been stabilized. Erosion is likely to be an on-going concern. Final outfall locations and structural runoff controls have not been identified. The SWPPP refers to a drainage plan still in the design phase, which may include additional information, including retention/evaporation ponds.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections (Part 4)</b>		
<u>General</u>	<b>Notes:</b>	
<b>Routine Facility Inspections</b>		
Are routine facility inspections conducted at least quarterly while facility operating?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	SWPPP says these will be conducted by Chad Burson, Manager but they are actually conducted by Tami Ross, Animas Environmental.
Are inspections documented, including: <ul style="list-style-type: none"> <li>• Date and time <b>No time</b></li> <li>• Name and signature of inspector <b>N</b></li> <li>• Weather information and a description of discharge occurring at the time of the inspection <b>N</b></li> <li>• Previously unidentified discharges from site <b>N</b></li> <li>• Control measures needing maintenance or repairs <b>Y</b></li> <li>• Failed control measures that need replacement <b>None noted</b></li> <li>• Incidents of noncompliance observed <b>Y</b></li> <li>• Additional control measures needed. <b>N</b></li> </ul>	Y <input checked="" type="checkbox"/> N	Reports are signed/certified by Jeannie Burson, Owner rather than Tami Ross.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>• Inactive and unstaffed sites</li> </ul>	Y <input type="checkbox"/> N	NA
<b>Quarterly Visual Assessment</b>		
Are quarterly visual assessments conducted?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>• Collected in a clean, clear glass or plastic container.</li> </ul>	Y <input type="checkbox"/> N	No discharge according to documentation. Outfalls have not yet been identified/constructed.

## 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	NA
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	
<b>Comprehensive Site Inspections</b>			
Are comprehensive site inspections conducted annually (start 9/29/09)?	<input checked="" type="checkbox"/> Y	N	One report for inspection on 9-27-2010 signed 11-11-2010.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	<input checked="" type="checkbox"/> N	No pollution team member. Inspection conducted by Tami Ross, Animas Environmental. No qualifications are documented.
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	N	NA

## 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 <b>Y</b></li> <li>• Leaks or spills from industrial equipment, drums, tanks, and other containers <b>Y</b></li> <li>• Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site <b>N</b></li> <li>• Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas <b>N</b></li> <li>• Control measures needing replacement, maintenance, or repair <b>Y</b></li> <li>• All storm water control measures observed. <b>Y</b></li> </ul>	Y	<input checked="" type="checkbox"/> N
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> <li>• Date of inspection <b>Y</b></li> <li>• Names and titles of personnel making the inspection <b>Y</b></li> <li>• Findings from examination of areas of facility from Part 4.3.1 <b>Y</b></li> <li>• All observations relating to implementation of control measures <b>Y</b></li> <li>• Any required revisions to the SWPPP resulting from inspection <b>NA</b></li> <li>• Any incidents of noncompliance identified OR certification that facility is in compliance with the permit <b>Y</b></li> <li>• A statement signed in accordance with Appendix B, Subsection 11 <b>Y</b></li> </ul>	<input checked="" type="checkbox"/> 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	SWPPP just says sampling will be done quarterly with locations. Nothing about sample collection or analytical procedures.
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	No discharges reported.
<b>Benchmark Monitoring</b>			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>• Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall</li> <li>• Prior to commingling.</li> </ul>	Y	N	No discharge according to documentation. Final locations of outfalls have not yet been identified or constructed.
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	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	N	NA
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	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>Most dismantling and draining of fluids is done indoors at this facility. Vehicles stored in the holding area are not yet drained and care must be taken to avoid leakage to the ground. There are several fuel tanks outdoors in secondary containment and a waste oil tank. There are several thousand vehicles stored at the site awaiting crushing or dismantling. According to the facility's representative, there are limited fluids in vehicles stored on the storage lots. Vehicles are received in a designated area and a fairly thorough administrative and environmental checklist is filled out upon arrival.</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, etc. observed but most of the vehicles in storage are on the ground rather than elevated. Most fluids are stored indoors in labeled containers.</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>Schedules and documentation for equipment. None documented for berms, some of which are still under construction. Some of the berms documented in the SWPPP need to be constructed and some that have been constructed appear to need repair.</p>

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SWPPP Implementation	
<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>Although vehicles are checked for leaks soon after they enter the yard, fluids are not actually drained until they are brought indoors for dismantling. Many of the vehicles and vehicle parts in storage may still have some fluids that may leak onto the ground.</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>Each of the terraces is bermed along the outer edge but very long, steep slopes have not been stabilized. Erosion is likely to be an on-going concern. Final outfall locations and structural runoff controls have not been identified. The SWPPP refers to a drainage plan still in the design phase, which may include additional information, including retention/evaporation ponds.</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>Terraces are bermed along the outer edge. Final outfall locations and structural runoff controls have not been identified. The SWPPP refers to a drainage plan still in the design phase, which may include additional information, including retention/evaporation ponds.</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.</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>Most of the vehicle storage area is unpaved but no offsite tracking was observed on the date of this inspection. As noted above, long steep slopes have not been stabilized so erosion, including wind erosion, is likely to be an on-going concern.</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*)

Most sector M specific requirements for the areas covered under the MSGP are addressed above.

# NPDES Industrial Storm Water Checklist (MSGP)

## NMED/SWQB

### Official Photograph Log

Photo # 1

Photographer: Rich Powell	Date: 19 April 2011	Time: 1253
City/County: Farmington/San Juan	State: New Mexico	
Location: Highway 64 Truck & Auto Salvage		
Subject: Looking north at fill on southwest end of site. Construction of berm & access road on-going.		



# NPDES Industrial Storm Water Checklist (MSGP)

## NMED/SWQB

### Official Photograph Log

Photo # 2

Photographer: Rich Powell	Date: 19 April 2011	Time: 1533
City/County: Farmington/San Juan	State: New Mexico	
Location: Highway 64 Truck & Autp Salvage		
Subject: Looking southeast off upper storage area. Locke Arroyo is along the east side leading to San Juan River visible in middle distance (1/2 mile from site).		



# NPDES Industrial Storm Water Checklist (MSGP)

## NMED/SWQB

### Official Photograph Log

Photo # 3

Photographer: Rich Powell	Date: 19 April 2011	Time: 1552
City/County: Farmington/San Juan	State: New Mexico	
Location: Highway 64 Truck & Auto Salvage		
Subject: Looking south at uncovered parts storage area. Roof will be installed in the future.		

