



NEW MEXICO
ENVIRONMENT DEPARTMENT
Surface Water Quality Bureau



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 10, 2010

Mr. Alex C. Brown, Town Manager
P.O. Box 1188
Silver City, New Mexico 88062

Re: Industrial Stormwater, SIC 4952, NPDES Compliance Evaluation, Silver City, Waste Water
Treatment Facility, NMR05GZ88, July 15, 2010

Dear Mr. Brown:

Enclosed, please find a copy of your report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at a Wastewater Treatment facility for which you may be an "operator" as defined under the Multi-Sector General Permit Appendix A. The NMED conducted this inspection 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.

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 the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald
U.S. Environmental Protection Agency
Allied Bank Tower
Region VI Enforcement Branch (6EN-WT)
1445 Ross Avenue
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

Thank you for your cooperation and assistance during this inspection. If you have any questions about this inspection report, please contact me at (505) 827-2575.

Sincerely,

/s/ Daniel Valenta

Daniel Valenta
Environmental Scientist/Specialist
Surface Water Quality Bureau

cc: Marcia Gail Bohling, USEPA (6EN-AS) by e-mail
Samuel Tate, USEPA (6SF) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
NMED District III, Frank Fiore, by e-mail



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 8 11 12 1 0 0 7 1 5 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
Silver City Wastewater Treatment Plant, 1660 Filaree Road, Silver City, New Mexico 88061, NMR05GZ88 Grant County	1412 / 4-15-2010	September 29, 2008
	Exit Time/Date	Permit Expiration Date
	1540 / 4-15-2010	September 29, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
Shirley Smith/Facility Foreman/575-388-4981 Charles Melaney/Assistant Engineer & Flood Plan Administrator/575-534-6368 Manny Orosco/Operator/575-388-4981	Latitude N 35° 38' 09.70" Longitude W 106° 04' 30.94"	
Name, Address of Responsible Official/Title/Phone and Fax Number	SIC 4952 (Treatment Works)	
Mr. Alex C. Brown, Box 1188, Silver City, New Mexico 88062/Town Manager/575-534-6358	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)

U	Permit	N	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	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)

- Inspector arrived on site at 1412 on 7/15/2010, an entrance interview was conducted with Mr. Charles Melaney, during which the Inspector made introductions, showed credentials and explained the purpose of the inspection. A brief exit meeting was held at 1535, items discussed during the inspections were reviewed.
- As a major WWTP, the City of Silver City did not have the required coverage under the previous 2000-20005 Multi-Sector General Permit.
- See attached checklist.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Daniel Valenta	NMED/SWQB/505-827-2575/505-827-0160	
/S/ Daniel Valenta		8/10/2010
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
Richard E. Powell	NMED/SWQB/505-827-2798 and 827-0160	
/S/ Richard Powell		8/10/2010

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information			General	
Inspection Type	Compliance Evaluation		Inspector Name	Daniel Valenta
NPDES ID Number	NMR05GZ88		Telephone	505-827-2575
Inspection Date	7/15/2010		Entry Time	1412
Inspector Type <i>(circle one)</i>	EPA	State	Exit Time	1540
Facility Sector/ SIC/Activity Code	Treatment Works/WWTP/4952		Signature	

Facility Location Information				
Name/Location/ Mailing Address	Silver City Wastewater Treatment Plant 1660 Filaree Road Silver City, NM 88061			
GPS Coordinates	Latitude	35° 38' 09.70" N	Longitude	106° 04' 30.94" W
Receiving Water(s)	San Vicente Arroyo thus Mimbres River Basin			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Silver City Wastewater Treatment Facility	575-388-4981
Facility Contact	Shirley Smith - Facility Foreman Charles Melaney - SWPPP Contact Manny Orosco – Operator	575-388-4981 575-534-6368 575-388-4981
Authorized Official(s)	Alex Brown – Town Manager	575-534-6358

Basic Permit Information			Basic SWPPP Information		
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	<input type="checkbox"/> N
Operational Date	Facility Operational since 1989		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	6/8/10		SWPPP Date	5/5/10	
If applicable, is no exposure certification on file?	Y	<input type="checkbox"/> N	<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
<u>General</u>	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/> Y	N	
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/> Y	N	
Copy of the permit language?	<input checked="" type="checkbox"/> Y	N	Stated in SWPPP, permit was not printed but could be found on the Internet.
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"/> N	No past reports/inspections retained, provided.
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	Y	N	N/A, facility active 24/7.
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input checked="" type="checkbox"/> Y	N	Endangered species documentation provided. Criterion A selected.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/> 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	<input checked="" type="checkbox"/> N	SWPPP not signed by authorized official.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/>	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<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"/>	
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?	Y	<input checked="" type="checkbox"/>	No BMP listed on map
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<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	<input checked="" type="checkbox"/>	SWPPP reports no significant spills or leaks have occurred.
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/>	N	Discharge outfall noted in SWPPP.
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	Given unique identification 002.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	<input checked="" type="checkbox"/>	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/>	SWPPP certifies no non-storm water discharges.

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"> • 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	<input type="checkbox"/> N	Map does not contain fuel storage areas, septic dump station, or open waste containers.
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	<input type="checkbox"/> N	Drainage patterns 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?	<input checked="" type="checkbox"/> Y	N	SWPPP documents areas where industrial materials or activities are exposed to storm water but certifies no non-stormwater discharges occur.
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	<input type="checkbox"/> N	SWPPP document certifies no spills or leaks.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> • Date • Description of evaluation criteria • List of the outfalls or onsite drainage points directly observed • Different types of non-storm water discharges and source locations • Actions taken such as a list of control measures for elimination. 	<input checked="" type="checkbox"/>	N	SWPPP contains statement that no non-storm water discharges have occurred.
Does salt storage occur at this facility?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input checked="" type="checkbox"/>	No previous permit was in place.
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/>	N	Berms and retention pond will be used.
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input checked="" type="checkbox"/>	N	Use of berms to prevent run-on, retention pond to retain onsite stormwater and berms to prevent discharge of stormwater.
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	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/>	N	SWPPP describes training and practices to keep site orderly and clean.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants		Notes:	
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<input checked="" type="checkbox"/> 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?	<input checked="" type="checkbox"/> Y	N	Activities described in SWPPP.
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	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	<input checked="" type="checkbox"/> N	SWPPP address the issue but failed in following through on site. Drums of unknown fluid not labeled, fuel tanks have secondary containment but no labels on what they are. Outside of tanks rusting.
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	Y	<input checked="" type="checkbox"/> N	Storage yard equipment and drums left exposed to rainwater or that may leak.
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> 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?	<input checked="" type="checkbox"/> Y	N	Training program in place with supporting documentation.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants		Notes:	
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/> 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 checked="" type="checkbox"/> N	Majority of site covered by buildings or impervious cover. Unused portions of site stabilized by native vegetation. .
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	<input checked="" type="checkbox"/> N	Due to berming and retention pond site retains majority of rainwater.
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	<input type="checkbox"/> N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Training program in place with supporting documentation.
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	<input type="checkbox"/> N	Site training included stormwater control and maintance on BMP's.
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	<input checked="" type="checkbox"/> N	Discussed in SWPPP, not implemented at site. Open waste containers with debris blowing out or not put in container, (see photo 1 & 2).
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Majority of site paved, covered, with impervious material.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description:

The Silver City Wastewater Treatment Plant (WWTP) is described in the NOI as 13 acres and has design flow of 2.0 MGD. The WWTP provides primary and secondary treatment of community sewage including de-nitrification. Class B sludge is generated and hauled to an approved landfill for final disposal. Fats, oils, and greases (FOG) are collected and treated in concrete lined areas. Septage wastes are received onsite and treated in aeration tanks before entering the treatment train. The effluent from the treatment plant is discharged to receiving waters named San Vicente Arroyo, an intermittent tributary in the Mimbres River Basin. The San Vicente Arroyo intersects the Mimbres River approximately 31 miles downstream from the site.

The WWTP is located in a bend of the San Vicente Arroyo. The north and south side of the facility is bermed to prevent the San Vicente from flooding onto the plant grounds. The site slopes from west to east. Except for the entrance driveway, the surrounding area is undeveloped vegetated grass/shrub. Small to no berming is in place to prevent sheet flow from entering the site from the west. A small depression has been dug on the east side perimeter to collect water that may flow through the facility.

The southwest side of the facility is used for open storage. There is a truck, trailers, crane, electric motors, and three drums of an unknown liquid. There is no secondary containment around the drums. At the plant headworks and at the septic drop off area, there are large open waste containers, (see photo 1 & 2). These large containers do not have lids and thus open to rain, and any animal that may wish to enter the containers. Vector control of these areas should be a priority due to residential housing within a block of the facility. Waste is scattered around the containers which may pose a human health hazard as well as contaminate rainwater falling on the area.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	N	Facility filed for permit on 6/8/10. The facility did not have required coverage under the previous 2000-2005 Multi-Sector General Permit.
Are inspections documented, including: <ul style="list-style-type: none"> • Date and time • Name and signature of inspector • Weather information and a description of discharge occurring at the time of the inspection • Previously unidentified discharges from site • Control measures needing maintenance or repairs • Failed control measures that need replacement • Incidents of noncompliance observed • Additional control measures needed. 	Y	N	Routine quarterly inspections now required.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	N	N/A
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	Y	N	Facility filed for permit on 6/8/10. The facility did not have required coverage under the previous 2000-2005 Multi-Sector General Permit.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container. 	Y	N	No sample ever collected.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
<p>Are assessments documented, including:</p> <ul style="list-style-type: none"> • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes. 	Y	<input checked="" type="checkbox"/>	No samples collected yet.
<p>Exceptions, including (see 4.2.3):</p> <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites. 	Y	N	N/A
Comprehensive Site Inspections			
<p>Are comprehensive site inspections conducted annually (start 9/29/08)?</p>	Y	N	<p>Permit acquired on 6/8/10. Comprehensive Site Inspection required before September 29, 2010.</p> <p>The facility did not have required coverage under the previous 2000-2005 Multi-Sector General Permit.</p>
<p>Conducted by qualified personnel including at least one member of the storm water pollution prevention team?</p>	Y	N	No documentation to review.
<p>Cover all areas of the facility?</p>	Y	N	No documentation to review.
<p>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?</p>	Y	N	No documentation to review.

NPDES Industrial Storm Water Checklist (MSGP)

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

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	No sector sampling requirements.
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	<input checked="" type="checkbox"/> N	None required
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	<input checked="" type="checkbox"/> N	None required
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: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling. 	Y	N	No benchmark monitoring required.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	No samples ever collected.
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	No samples ever collected.

NPDES Industrial Storm Water Checklist (MSGP)

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

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<p>Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff</p>	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>All processing of raw materials, loading and unloading, and equipment fueling are done outdoors. Sludge drying beds open to rainwater. Beds sloped towards drains but loose sludge scattered outside containment. Collection system for trapping and containing stormwater not completed, sampling discharge point not fully functional.</p>
<p>Good Housekeeping</p>	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>Good Housekeeping procedures are listed in SWPPP but not implemented at site. Waste scattered around open containers. A pallet of full of Anti-Foam chemicals that was left outdoors with some of the containers knocked down and scattered, (see photo 3). No containers were leaking at this time.</p>
<p>Preventative maintenance</p>	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>Repairs and preventative maintenance addressed in SWPPP. Logbook kept for daily repairs and maintenance performed.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Spill procedures and response are discussed in SWPPP. No documentation in SWPPP of any spill event occurring.</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Site is open to rainwater, no berms in place to prevent on flow of rainwater from southwest of site.</p>
Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Sediment pond in place to collect rainfall runoff.</p>
Salt Storage Piles	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>N/A</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>Open containers of waste on site, open to stormwater, and being spilled on the ground, (see Photo 1 & 2). Junk and waste on south side of site needs to be disposed of or secured.</p>
Evidence of non-storm water discharges	<p>No evidence of non-storm water discharges observed.</p>
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Majority of site is paved or covered with rock/vegetation.</p>

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Implementation and Sector Specific Requirements

1. Signatory Requirements per Appendix B.11.B.2. *Your SWPPP, including changes to your SWPPP to document any corrective actions taken as required by Part 3.1, and all reports submitted to EPA, must be signed by a person described in Appendix B, Subsection 11.A above or by a duly authorized representative of that person. A person is a duly authorized representative only if:*

2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and

The Stormwater Pollution Prevention Plan (SWPPP) must be signed by an individual holding one of the positions listed above, or have the authority to make management decisions which govern the operation of the regulated facility and have the authority delegated to them in accordance with corporate procedures. The WWTP Foreman has been delegated this authority, not the Assistant Engineer/Flood Plain Administrator who signed the SWPPP.

2. The 2000 MSGP requires per 9.2.1, *“Reissuance or replacement of this permit, at which time you must comply with the Notice of Intent conditions of the new permit to maintain authorization to discharge”*

Category	NOI Submission Deadline
<i>Existing Dischargers – in operation as of October 30, 2005 and authorized for coverage under MSGP 2000.</i>	<i>No later than January 5, 2009.</i>
<i>New Dischargers or New Sources - have commenced discharging between October 30, 2005 and January 5, 2009.</i>	<i>As soon as possible but no later than January 5, 2009.</i>

The NOI for the 2008 MSGP was submitted on 06/08/2010. The submission deadline for the 2008 MSGP was no later than January 5, 2009. The facility did not have required coverage under the previous 2000-2005 MSGP which had a submission deadline of January 29, 2001.

**NMED/SWQB
Official Photograph**

Photo #1

Photographer: Daniel Valenta	Date: 6/15/2010	Time: 1510
City/County: Silver City/Grant County		
Location: Silver City WWTP, facing northwest, north side of facility at 1660 East Filaree Road, Silver City, New Mexico 88061.		
Subject: Waste from headwork's at WWTP. Waste containers with no lids to keep out rainwater, debris blows out or not put in properly.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 7/15/2010	Time: 1524
City/County: Silver City/Grant County		
Location: Silver City WWTP, facing east, septic discharge station at 1660 East Filaree Road, Silver City, New Mexico 88061.		
Subject: Septic discharge station headwork's area. Waste from the location is placed in uncovered container.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 6/15/2010	Time: 1510
City/County: Silver City/Grant County		
Location: Silver City WWTP, facing south on north side of digester, 1660 East Filaree Road, Silver City, New Mexico 88061.		
Subject: Full containers of Anti-Foaming chemicals not properly stored.		

