



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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DAVE MARTIN
Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

December 20, 2011

Mr. Chong Lee, Manager – Environmental Services
FedEx Freight, Inc.
3405 Victor Street
Santa Clara, California 95054

RE: Industrial; Storm Water; SIC 4213; NPDES Compliance Evaluation Inspection; FedEx Freight, Inc. - Roswell; NMR05H452; December 8, 2011

Dear Mr. Lee:

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

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report; and required to correct any problems noted during the inspection and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both USEPA and NMED regarding modifications and compliance schedules.

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

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

Sincerely,

/s/ RICHARD E. POWELL

Richard E. Powell
Surface Water Quality Bureau

CC: Samuel Tate, USEPA (6EN-AS) by email
Carol Peters-Wagnon, USEPA (6EN-WM) by email
Marcia Gail Adams, USEPA (6EN-AS) by email
Diana McDonald, USEPA (6EN-WM) by email
Darlene Whitten-Hill, USEPA (6EN-WM) by e-mail
NMED, District I Albuquerque by email
Mr. Don Pierson, Service Center Manager, FedEx 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 H 4 5 2 11 12 1 1 1 2 0 8 17 18 ~ 19 S 20 2					
Remarks					
T R U C K I N G & C O U R I E R S E R V I C E S					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 4	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) FEDEX FREIGHT, INC. - ROW, 401 EAST BRASHER ROAD, ROSWELL, NM CHAVES COUNTY	Entry Time /Date 0915/12-8-11	Permit Effective Date 9-29-08
	Exit Time/Date 1130/12-8-11	Permit Expiration Date 9-29-13
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) LEIAH MONTOYA, OPERATIONS SUPERVISOR 575-627-5391	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number CHONG LEE, MANAGER - ENVIRONMENTAL SERVICES, FEDEX FREIGHT, INC., 3425 VICTOR STREET, SANTA CLARA, CA 95054 408-654-3112	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	LAT 33 21 03 LONG -104 31 07 SIC 4213

Section C: Areas Evaluated During Inspection

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

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

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

- FACILITY HAS APPLIED FOR AND RECEIVED REQUIRED NPDES PERMIT COVERAGE AND HAS PREPARED AND IMPLEMENTED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP). HOWEVER, NOI WAS SIGNED BY CHONG LEE, MANAGER - ENVIRONMENTAL SERVICES. IT IS UNCLEAR THAT MR. LEE HAS NPDES PERMIT SIGNATORY AUTHORITY FOR FEDEX FREIGHT, INC.
- AN EXIT INTERVIEW TO DISCUSS THE PRELIMINARY FINDINGS OF THIS INSPECTION WAS CONDUCTED WITH MS. MONTOYA AT APPROXIMATELY 1125 HOURS ON DECEMBER 8, 2011 AT THE SITE.
- SEE REPORT AND FURTHER EXPLANATIONS.

/s/ RICHARD E. POWELL	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2798	Date December 20, 2011
Signature of Management QA Reviewer /s/ SARAH HOLCOMB	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-222-9587	Date December 20, 2011

NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>			<u>General</u>	
Inspection Type	Compliance Evaluation		Inspector Name	Richard E. Powell
NPDES ID Number	NMR05H452		Telephone	(505) 827-2798
Inspection Date	12/8/2011		Entry Time	0915/12-8-11
Inspector Type <i>(circle one)</i>	EPA	State	Exit Time	1130/12-8-11
Facility Sector/ SIC/Activity Code	P/4213 Trucking, Except Local		Signature	<i>/s/ RICHARD E. POWELL</i>

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	FedEx Freight, Inc. - Roswell, 401 East Brasher Road, Roswell, NM 88201			
GPS Coordinates	Latitude	33 21 03	Longitude	-104 31 07.8
Receiving Water(s)	Tributary to the Hagerman Canal; thence to the Pecos River in Segment 20.6.4.206 NMAC of the Pecos River Basin			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	FedEx Freight, Inc. - Roswell	
Facility Contact	Leiah Montoya, Operations Supervisor	575-627-5391
Authorized Official(s)	Chong Lee - Manager Environmental Services (signed NOI)	408-654-3112

<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	Unknown		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	N
NOI/Application Date	9-22-2010		SWPPP Date	8/24/2010	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General	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"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	Y	N	NA
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	N	NA
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	NOI says Criterion A. However, to be eligible under Criterion A, no federally-listed threatened or endangered species or their designated critical habitat are likely to occur in the "action area" as defined in Appendix A. Just discuss critical habitat. There are one or more endangered species in the Pecos River.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<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	But needs to be updated to include current staff/titles.
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/> Y	N	
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/> N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all existing structural control measures?	Y	<input checked="" type="checkbox"/> N	None except paving.
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/> N	None - all sheet flow.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input checked="" type="checkbox"/> Y	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"/> Y	N	
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"/> Y	N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	NA
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	NA

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 NA • Vehicle and equipment maintenance and/or cleaning areas Y • Loading/unloading areas Y • Locations used for the treatment, storage or disposal of wastes Y • Liquid storage tanks NA • Processing and storage areas NA • 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 NA • Transfer areas for substances in bulk NA • Machinery Y 	<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	None documented.
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<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?	Y	N	No spills documented.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> • Date Y • Description of evaluation criteria N • List of the outfalls or onsite drainage points directly observed N • Different types of non-storm water discharges and source locations N • Actions taken such as a list of control measures for elimination. N 	Y	<input type="checkbox"/> N	Evaluation was apparently done on 12/30/2010 by Deshawn Nix but does not document required information.
Does salt storage occur at this facility?	Y	<input type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	NA
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	Y	<input type="checkbox"/> N	Not documented.
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/> Y	N	
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"/> 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?	<input checked="" type="checkbox"/> Y	N	Trash pick-up done 2/week.
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	Just inspections. No structural measures at this facility. Vehicle maintenance offsite except for washing.
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?	Y	<input type="checkbox"/> N	Just a few barrels of oil and other materials onsite. Not all appear to be labeled.
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	N	All barrels are indoors in secondary containment. Facility may want to relocate storage to an area with less potential for puncturing containers with their forklift.
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	N	Procedures in SWPPP but no spills documented.
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	Y	<input type="checkbox"/> N	No training documented.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	<input type="checkbox"/> N	List regulatory contacts except for State of New Mexico contacts.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	Y	N	NA - site all paved.
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	NA
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	Although three outfalls have been identified in the SWPPP, drainage appears to be just sheet flow with no obvious channelized discharge locations.
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	1/year in August but none documented.
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	Y	<input checked="" type="checkbox"/> N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	N	NA - paved.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	N	No non-storm water discharges documented.

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

The entire site is paved.

FedEx Freight, Inc. submitted an NOI for the Roswell, NM facility on September 22, 2010 (effective October 22, 2010) and was issued permit reference number NMR05H452. However, the NOI was signed and certified by Chong Lee, Manager – Environmental Services for FedEx Freight, Inc. MSGP Appendix B.11 states:

A. All applications, including NOIs, must be signed as follows:

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....

Mr. Lee does not appear to meet the signatory requirements of the permit for FedEx Freight, Inc. and as such, does not appear to have the authority to sign permit applications for FedEx Freight, Inc. NPDES permit application signatory authority cannot be delegated and must be signed by a person who meets the above description.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	<input checked="" type="checkbox"/> Y	N	
Are inspections documented, including: <ul style="list-style-type: none"> • Date and time Y • Name and signature of inspector Y • Weather information and a description of discharge occurring at the time of the inspection Y • Previously unidentified discharges from site NA • Control measures needing maintenance or repairs None noted • Failed control measures that need replacement None noted • Incidents of noncompliance observed None noted • Additional control measures needed. None noted 	<input checked="" type="checkbox"/> Y	N	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	N	NA
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	<input checked="" type="checkbox"/> Y	N	But only document one quarter with an actual discharge (8/24/2010).
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge Y • On discharges that occur at least 72 hours (3 days) from the previous discharge Y • Collected in a clean, clear glass or plastic container. N 	Y	<input checked="" type="checkbox"/> N	Container type not documented.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections		
Are assessments documented, including: <ul style="list-style-type: none"> • Sample location N • Sample collection date/time & visual assessment date/time Y • Personnel collecting sample & performing assessment and their signature Y • Nature of the discharge (runoff or snowmelt) Y • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) Y • Probable sources of contamination NA • If applicable, reason for not taking samples within 1st 30 minutes. NA 	<input checked="" type="checkbox"/>	N
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites. 	Y	<input checked="" type="checkbox"/>
Comprehensive Site Inspections		
Are comprehensive site inspections conducted annually (start 9/29/09)?	<input checked="" type="checkbox"/>	N
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	<input checked="" type="checkbox"/>
Cover all areas of the facility?	<input checked="" type="checkbox"/>	N
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	Y	<input checked="" type="checkbox"/>
		Although this facility would likely be eligible for the irregular rainfall exception, the operator apparently does not document the use of this exception. It appears the operator only conducts this assessment if there happens to be a discharge at the time the routine facility inspections are done. Although rainfall has been limited in this area since permit coverage was granted, it seems inconceivable that no more than one discharge has occurred, especially given the impervious nature of the site and the lack of structural controls.
		No qualifications documented.
		See information under visual monitoring above.

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

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	NA
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	NA
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	NA
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	NA
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	<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)

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	NA
Exceptions, including (see 6.1 & 6.2): <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Snowmelt Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	Y	<input checked="" type="checkbox"/> N	
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	Y	<input checked="" type="checkbox"/> N	
Reporting (Part 7)			
<u>General</u>		Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	No benchmark monitoring required.
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)

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>Most materials and activities are indoors at this site. Minimal oil drips on asphalt yard area. Two dumpsters onsite, one with a closed lid, one that needs lid installed and used.</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>Little or no trash, etc. observed. One dumpster lid was closed, one has no lid.</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>There are no structural controls at this site. Preventative maintenance for equipment and systems is not addressed in the SWPPP. According to the facility's representatives, inspections and offsite maintenance are done as needed.</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>Just a few barrels of oil and other materials onsite. All barrels are indoors in secondary containment. Facility may want to relocate storage to an area with less potential for puncturing containers with their forklift.</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>The entire site is paved.</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>There are no structural controls at this site.</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>No salt storage onsite.</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>Little litter in evidence on the date of this inspection.</p>
Evidence of non-storm water discharges	<p>None observed. According to the facility's representative, onsite vehicle washing is conducted by a contractor in a designated area in the yard. Wash waters are recovered and taken offsite for disposal.</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>Minimal as is paved.</p>

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Implementation and Sector Specific Requirements

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

Sector P specific requirements for the areas covered under the MSGP are addressed above. There is no onsite fueling or maintenance other than vehicle washing onsite.