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NEW MEXICO  
ENVIRONMENT DEPARTMENT  
*Surface Water Quality Bureau*

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DAVE MARTIN  
Secretary

RAJ SOLOMON, P.E.  
Deputy Secretary

**Certified Mail – Return Receipt Requested**

March 2, 2011

Mr. Mike Thomas, General Manager  
Olam Spices and Vegetables, Inc.  
1650 W. Amador  
Las Cruces, NM 88005

**Re: Industrial Storm Water, SIC 2034, NPDES Compliance Evaluation Inspection, Olam Spices and Vegetables, Inc., NMR05H566, February 22, 2011**

Dear Mr. Thomas,

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

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

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

Thank you for the cooperation and assistance that you provided during my visit to your site. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 222-9587.

Sincerely,

Sarah Holcomb  
Environmental Scientist/Specialist  
Surface Water Quality Bureau

Cc: Marcia Gail Adams, USEPA (6EN-AS) via e-mail  
Samuel Tate, USEPA (6EN-AS) via e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail  
Diana McDonald, USEPA (6EN-WM) via e-mail  
Frank Fiore, NMED District 3 Manager, via 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	H	5	6	6	11	12	1	1	0	2	2	2	17	18 ~	19 S	20 2		
Remarks																								
D E H Y D R A T E D C H I L E																								
Inspection Work Days						Facility Evaluation Rating						BI	QA	-----Reserved-----										
67						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) <b>OLAM SPICES AND VEGETABLES, LAS CRUCES, NM: FROM I-25, HEAD WEST ON I-10 AND TAKE EXIT 142 ON THE I-10 BUSINESS ROUTE. TURN WEST ON W.AMADOR. FACILITY IS AT 1650.</b>	Entry Time /Date <b>0840 hours / 02-22-2011</b>	Permit Effective Date 09-28-2008
	Exit Time/Date <b>1130 hours / 02-22-2011</b>	Permit Expiration Date 09-28-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>MR. MIKE THOMAS, GENERAL MANAGER (575) 528-6225</b>	Other Facility Data N. 32° 18' 14" W. -106° 47' 49"	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. MIKE THOMAS, GENERAL MANAGER (575) 528-6225 1650 W. AMADOR AVE., LAS CRUCES, NM 88005	SIC:2034	
<p style="text-align: center;">Contacted</p> Yes <input checked="" type="checkbox"/> No <input 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	S	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)

- INSPECTOR ARRIVED ONSITE AT 0840 HOURS ON FEBRUARY 22, 2011 AND CONDUCTED THE ENTRANCE INTERVIEW WITH MR. MIKE THOMAS, GENERAL MANAGER, WHERE THE INSPECTOR MADE INTRODUCTIONS, PRESENTED CREDENTIALS AND DISCUSSED THE PURPOSE OF THE INSPECTION.
- PLEASE SEE REPORT FOR FURTHER DETAILS.

Name(s) and Signature(s) of Inspector(s) <b>Sarah Holcomb</b>	Agency/Office/Telephone/Fax NMED/SWQB 505-222-9587	Date
Signature of Management QA Reviewer <b>Richard Powell</b>	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date

National Database Information		General	
Inspection Type	CEI	Inspector Name	Sarah Holcomb
NPDES ID Number	NMR05H556	Telephone	505-222-9587
Inspection Date	02-22-2011	Entry Time	0840 hours
Inspector Type (circle one)	EPA <input type="checkbox"/> State <input checked="" type="checkbox"/> EPA Oversight	Exit Time	1130 hours
Facility Sector/ SIC/Activity Code	Sector U; SIC 2034	Signature	

Facility Location Information			
Name/Location/ Mailing Address	Olam Spices and Vegetables, Inc. 1650 W. Amador Ave., Las Cruces, NM 88005		
GPS Coordinates	Latitude	N. 32° 18' 14"	Longitude      W. -106° 47' 49"
Receiving Water(s)	Mesilla Drain thence to Rio Grande in segment 20.6.4.101 NMAC		

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Olam Spices and Vegetables, Inc.	
Facility Contact	Mr. Mike Thomas, General Manager	575-528-6225
Authorized Official(s)	Mr. Mike Thomas, General Manager	575-528-6225

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	Y	<input checked="" type="checkbox"/> N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Permit Type	<input checked="" type="checkbox"/> General <input type="checkbox"/> Individual		SWPPP Contents Satisfactory	Y	<input checked="" type="checkbox"/> N
Operational Date	1967		SWPPP Implementation Satisfactory	Y	<input checked="" type="checkbox"/> N
NOI/Application Date	?		SWPPP Date	3-20-2007	
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	The old acknowledgement letter was in the SWPPP.
Copy of the permit language?	Y	<input checked="" type="checkbox"/>	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input checked="" type="checkbox"/>	N	
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"> <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	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/>	No documentation to support certification under "A".
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input checked="" type="checkbox"/>	No documentation to support certification under "A".
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/>	N	Signed by Mike Thomas, General Manager, 10-1-2010
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	Receiving, washing, drying, milling, blending, packaging and distribution of red chile. Quality control labs, product storage and raw material storage. Receiving, finished products shipping dock.
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?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	<input checked="" type="checkbox"/>	N	
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	N/A
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/>	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	<input checked="" type="checkbox"/>	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	N/A

## 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 YES</li> <li>• Vehicle and equipment maintenance and/or cleaning areas YES</li> <li>• Loading/unloading areas NO</li> <li>• Locations used for the treatment, storage or disposal of wastes YES</li> <li>• Liquid storage tanks YES</li> <li>• Processing NO and storage areas YES</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 N/A</li> <li>• Transfer areas for substances in bulk N/A</li> <li>• Machinery YES</li> </ul>	<input checked="" type="checkbox"/>	N	Processing area would apply to area where chile is washed outside during chile season.
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	N/A Site does not receive run on with significant quantities of pollutants.
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	Plant refuse bins, spare parts/wood pallets, metal drums, product staging bins, sunflower oil tanks.
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	N/A – no spills/leaks have occurred within the past three years.

## 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</li> <li>• Description of evaluation criteria</li> <li>• List of the outfalls or onsite drainage points directly observed</li> <li>• Different types of non-storm water discharges and source locations</li> <li>• Actions taken such as a list of control measures for elimination.</li> </ul>	Y	<input type="checkbox"/> N	
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?	<input type="checkbox"/> Y	N	
<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 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?	<input type="checkbox"/> Y	N	
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 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 type="checkbox"/> Y	N	

## 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?	<input checked="" type="checkbox"/>	N	
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"/>	N	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/>	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"/>	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"/>	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"/>	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/>	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"/>	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP document erosion and sediment controls?	<input checked="" 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?	<input checked="" type="checkbox"/>	N	
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?	<input checked="" type="checkbox"/>	N	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	N/A no salt storage at this facility.
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/>	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"/>	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"/>	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/>	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	N	No documentation to show that this has occurred.

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### **Site Description:**

Olam Spices and Vegetables, Inc. bought out this division of ConAgra in June 2010. As a result of the business change, the company submitted a Modification to their permit under tracking number NMR05GI87. EPA sent a letter back indicating that they needed to file a new NOI under the new company name. The facility representative had a letter showing their submission to EPA on 10-13-2010 under tracking number NMR05H566, but this tracking number was not located in the EPA NOI Database. The inspector encouraged the facility representative to follow up with the NOI Processing Center to see why the NOI was not in the database.

There was no documentation in the SWPPP to justify the facility's submissions under Criterion A for Endangered Species Act purposes (such as a biologist's report that there are no endangered species on the property and that the facility's stormwater will not have an effect on species downstream from the site) and Criterion A for Historic Properties Act purposes.

The site map for the facility needed to have items added to it. The size of the facility in acres, and the numbers and locations of stormwater monitoring sites were not located on the map as of the time of this inspection. Also, processing areas where chile is washed outside during the fall chile season were not indicated on the site map.

There is no documentation showing that employee training is conducted on an annual basis for all parties involved in stormwater compliance for the facility. There is documentation of training for one person on 5-19-2008, one person on 6-9-2009 and for all on 3-1-2007.

There is also no documentation to show that a non-storm water evaluation was ever done for the site. This should include the date, a description of evaluation criteria, a list of the outfalls or onsite drainage points directly observed, different types of non-stormwater discharges and source locations, and actions taken to eliminate those sources of non-stormwater.

It appears that inspections are conducted almost as often as required. The documentation showed routine facility inspections were conducted on 2-4-2008, 5-19-2008, 6-23-2009, 8-10-2009, 11-3-2009, 1-18-2010, 3-11-2010, 4-5-2010, 7-7-2010, and 10-1-2010. The only thing not included on the inspection forms was weather information at the time of the inspection.

Quarterly visual assessments were conducted and documented on 5-19-2008 and 3-11-2010. A sample was collected from the largest pond on site for this evaluation. The inspector explained that a sample only needs to be taken when there is an actual discharge from the site. The facility may also qualify for the arid area exclusion, and the new sampling schedule should be sent to EPA and documented in the SWPPP with the first permit quarter.

One inspection was documented as being a comprehensive annual inspection, however, most of the required information was missing from the form. There was no annual report generated from this inspection.

## 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?	Y	<input type="checkbox"/> N	Inspections are documented on: 2-4-2008, 5-19-2008, 6-23-2009, 8-10-2009, 11-3-2009, 1-18-2010, 3-11-2010, 4-5-2010, 7-7-2010, 10-1-2010..
Are inspections documented, including: <ul style="list-style-type: none"> <li>• Date and time YES</li> <li>• Name and signature of inspector YES</li> <li>• Weather information and a description of discharge occurring at the time of the inspection NO</li> <li>• Previously unidentified discharges from site NO</li> <li>• Control measures needing maintenance or repairs YES</li> <li>• Failed control measures that need replacement YES</li> <li>• Incidents of noncompliance observed YES</li> <li>• Additional control measures needed YES</li> </ul>	<input checked="" type="checkbox"/> Y	N	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>• Inactive and unstaffed sites</li> </ul>	Y	N	N/A
<b>Quarterly Visual Assessment</b>			
Are quarterly visual assessments conducted?	Y	<input type="checkbox"/> N	5-19-2008, 3-11-2010
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge NO</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge YES</li> <li>• Collected in a clean, clear glass or plastic container NO</li> </ul>	Y	<input type="checkbox"/> N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>		
Are assessments documented, including: <ul style="list-style-type: none"> <li>• Sample location</li> <li>• Sample collection date/time &amp; visual assessment date/time</li> <li>• Personnel collecting sample &amp; performing assessment and their signature</li> <li>• Nature of the discharge (runoff or snowmelt)</li> <li>• Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators)</li> <li>• Probable sources of contamination</li> <li>• If applicable, reason for not taking samples within 1<sup>st</sup> 30 minutes.</li> </ul>	Y	<input checked="" type="checkbox"/> N
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> <li>• Adverse weather conditions</li> <li>• Climates with irregular storm water runoff</li> <li>• Areas subject to snow</li> <li>• Substantially identical outfalls (per 5.1.5.2)</li> <li>• Inactive and unstaffed sites.</li> </ul>	Y	<input checked="" type="checkbox"/> N
<b>Comprehensive Site Inspections</b>		
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input checked="" type="checkbox"/> N
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input checked="" type="checkbox"/> Y	N
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	<input checked="" type="checkbox"/> N

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>		
<p>Include observations of the following:</p> <ul style="list-style-type: none"> <li>• Industrial materials, residue, or trash that may have or could come into contact with storm water YES</li> <li>• Leaks or spills from industrial equipment, drums, tanks, and other containers YES</li> <li>• Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site NO</li> <li>• Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas NO</li> <li>• Control measures needing replacement, maintenance, or repair YES</li> <li>• All storm water control measures observed NO</li> </ul>	Y	<input checked="" type="checkbox"/> N
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> <li>• Date of inspection YES</li> <li>• Names and titles of personnel making the inspection YES</li> <li>• Findings from examination of areas of facility from Part 4.3.1 NO</li> <li>• All observations relating to implementation of control measures NO</li> <li>• Any required revisions to the SWPPP resulting from inspection NO</li> <li>• Any incidents of noncompliance identified OR certification that facility is in compliance with the permit NO</li> <li>• A statement signed in accordance with Appendix B, Subsection 11 NO</li> </ul>	Y	<input checked="" type="checkbox"/> 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	N	N/A
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	N/A
<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	N/A
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	N/A

## 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	N/A
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	N	N/A
<b>Effluent Limitations Monitoring</b>			
Sampled once per year?	Y	N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	N/A
<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	N/A
<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	N/A
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/>	
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	N/A

## 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>Site does not receive significant run on. Operations conducted outdoors are chile washing during the fall and wastewater treatment/screening. Occasionally screens used in the process are brought outside to clean and the washwater is directed to a drain, which is then sent to the wastewater system.</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>Site is clean and orderly, and materials are labeled, and stored within appropriate containers, most under cover of a roof.</p>
<p><b>Preventative maintenance</b></p>	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>Facility does regular inspections of the site to look for problems. Machinery is maintained to prevent leaks.</p>

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<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>Minimal chemicals are kept on site and what there is, is located under cover. Facility has spill response procedures in place.</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>Site is located mostly on paved area, but the chile unloading/processing area is dirt. However there are drainage ditches that carry stormwater to various 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>There are 5 ponds located on site to deal with stormwater runoff.</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>There are no salt storage piles at this facility.</p>

SWPPP Implementation	
<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>Trash is picked up as it is noticed. The site is very clean and orderly.</p>
<b>Evidence of non-storm water discharges</b>	<p>No non-storm water discharges were observed during this inspection.</p>

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SWPPP Implementation	
<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>The inspector did not note a problem with dust during this inspection, but there is the potential to track some of the materials off site.</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*)

1. Most chemicals and shop maintenance is located under cover, away from exposure to rainfall.
2. 5 ponds are located on site to deal with rainfall/stormwater. These ponds are allegedly designed for a 500 year event.
3. There are multiple ditches to direct stormwater runoff to the various ponds on site.

### **Sector Specific Requirements**

8.U.3: SWPPP did not document that pest control was included in employee stormwater training.

8.U.5: Waste management units are required to included in the quarterly stormwater inspections. This should be added to the current inspection form.