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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARKLIN
Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

February 15, 2012

Mr. Neil Goldberg, Co-Owner
Gold Metal Recyclers New Mexico
dba National Metal Recycling
4305 South Lamar Street
Dallas, Texas 75215

RE: Industrial Storm Water; SIC 5093; NPDES Compliance Evaluation Inspection; Gold Metal Recyclers New Mexico dba National Metal Recycling; NPDES Permit NMR05H613; January 30, 2012

Dear Mr. Goldberg:

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 (Diana McDonald, USEPA (6EN-WM), 1445 Ross Ave., Dallas, Texas 75202) and NMED (at above address) regarding modifications and compliance schedules.

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

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

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Surface Water Quality Bureau

Cc: Marcia Gail Adams, EPA, Enforcement Section by e-mail
Carol Peters-Wagnon, EPA by e-mail
Diana McDonald, EPA by e-mail
Samual Tate, EPA, by e-mail
Darlene Whitten-Hill, EPA, by e-mail
NMED District I by e-mail
Scott Steinberg, Manager



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 6 1 3 11 12 1 2 0 1 3 0 17 18 ~ 19 S 20 2					
Remarks					
S C R A P M E T A L R E C Y C L I N G					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 [] [] [] 69	70 3	71 N 72 N 73 [] [] 74 75 [] [] [] [] 80			

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date 1134 Hours / 1-30-2012	Permit Effective Date 9-29-2008
Gold Metal Recyclers New Mexico LLC dba National Metal Recycling, 3906 4 th Street NW, Albuquerque NM 87107	Exit Time/Date 1543/ 1-30-2012	Permit Expiration Date 9-29-2013
Bernalillo County	Other Facility Data	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	N. 35° 07' 22.57" W. -106° 38' 37.60"	
Scott Steinberg/Manager/505-344-1777 Adem Schaer/ Assistant Manager/ 505-453-7844	SIC 5093 Sector N	
Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	
Neil Goldberg, 4305 South Lamar Street, Dallas, Texas 75215/Co-Owner/214-421-0247 fax 469-398-1713		

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	N	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 on site at 1340 on 1/30/2012, conducted entrance interview with Adem Schaer, during which the Inspector made introductions, showed credentials and explained the purpose of the inspection.
- See attached checklist.
- This report is based on a review of the files maintained by the permittee and NMED, on-site observations by NMED personnel, and verbal information provide by the facility's representative.
- An exit interview to discuss the preliminary finding of the inspection was conducted at approximately 1543 on 1/30/2012 with Scott Steinberg and Adam Schaer at the site.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
DANIEL VALENTA /s/Daniel Valenta	NMED/SWQB 505-827-2575	2/15/2012
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
RICHARD E. POWELL /s/Richard Powell	505-827-2798	2/15/2012

National Database Information		General	
Inspection Type	Compliance Evaluation	Inspector Name	Daniel Valenta
NPDES ID Number	NMR05H613	Telephone	505-827-2575
Inspection Date	1/30/2012	Entry Time	1340
Inspector Type (circle one)	EPA <input type="checkbox"/> State <input type="checkbox"/> EPA Oversight <input type="checkbox"/>	Exit Time	1543
Facility Sector/ SIC/Activity Code	Sector N/Recycling Facility/5093	Signature	

Facility Location Information			
Name/Location/ Mailing Address	Gold Metal Recyclers New Mexico LLC dba National Metal Recycling 3906 4 th Street NW Albuquerque, NM 87107		
GPS Coordinates	Latitude	35° 07' 22.57" N	Longitude -106° 38' 37.60" W
Receiving Water(s)	Albuquerque MS4 system to the Rio Grande in segment 20.6.4.105		

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Gold Metal Recyclers New Mexico, LLC/Owner	214-421-0247
Facility Contact	Scott Steinberg – Manager Adam Schaer – Assistant Manager	505-344-1777 505-453-7844
Authorized Official(s)	Neil Goldberg – Co-Owner	214-421-0247

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	<input 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	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Operational Date	Gold Metals acquired site around 2004		SWPPP Implementation Satisfactory	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
NOI/Application Date	10/27/2010		SWPPP Date	10/28/10	
If applicable, is no exposure certification on file?	<input type="checkbox"/> Y	<input checked="" 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?	Y	<input type="checkbox"/> N	NOI (10/27/2010) SWPPP signed (10/28/2010)
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	
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"/> Y	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"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	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"/> Y	N	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/> N	Criterion A selected on NOI, endangered species and critical habitats are found in the action area.
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?	<input checked="" type="checkbox"/> Y	N	
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?	<input checked="" type="checkbox"/>	N	
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	Site discharges to Albuquerque MS4 system.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/>	Discharge line from the battery storage shed to the stormwater drain.
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"/>	No significant spills or leaks noted.
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/>	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"/>	N	
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?	<input checked="" type="checkbox"/>	N	

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 - YES • Vehicle and equipment maintenance and/or cleaning areas - YES • Loading/unloading areas - NO • Locations used for the treatment, storage or disposal of wastes - YES • Liquid storage tanks – YES • Processing and storage areas - YES • 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 - YES • Transfer areas for substances in bulk - YES • Machinery - YES 	Y	<input 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	<input type="checkbox"/> N	Rain run-on almost reduced to zero.
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	
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 reports no spills or leaks have occurred in the last 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"> • Date - YES • Description of evaluation criteria - YES • List of the outfalls or onsite drainage points directly observed - YES • Different types of non-storm water discharges and source locations - YES • Actions taken such as a list of control measures for elimination. - YES 	<input checked="" type="checkbox"/>	N	
Does salt storage occur at this facility?	Y	<input checked="" type="checkbox"/>	N/A
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input checked="" type="checkbox"/>	
<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	
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	
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	Raw materials whenever possible are stored under covered areas or enclosed sheds. Area swept and cleaned daily.
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. Trash bins are present to contain waste.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<input type="checkbox"/> N	No schedule for pickup and disposal of trash.
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	Y	<input type="checkbox"/> N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input type="checkbox"/> N	No schedule included.
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 type="checkbox"/> Y	N	SWPPP describes procedures for spills, leaks, inspections and good housekeeping practices.
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 type="checkbox"/> Y	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input type="checkbox"/> Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input 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 type="checkbox"/> Y	N	Some training materials present in SWPPP.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input 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"/>	N	Area covered in asphalt.
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	Area covered in asphalt.
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"/>	Discharge flows to the street gutter and thence to Albuquerque's MS4 system.
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
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	Area covered in asphalt.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/>	N	

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Site Description:

The National Metal Recycling property is located in the east side of 4th Street NW, north of the intersection of 4th Street NW and Aztec Road in a partially commercial/industrial and partially residential portion of northwest Albuquerque. The site is approximately 1 acre in size. National Metal Recycling collects; sorts and stores scrap metals and then transports the metals off-site to a recycling facility. No metal smelting occurs at the National Metal Recycling facility. Scrap metals are sorted according to composition and are stored throughout the Site. Generally lower value metals such as steel and aluminum, appliances, and other miscellaneous scrap and obsolete equipment are stored outside on the perimeter of the Site. More valuable metals are stored in an enclosed lockable shed or shipping containers until transported off-Site for recycling.

Finding:

1. Per MSGP Table 1-2. NOI Submittal Deadlines/Discharge Authorization Dates, *“Other Eligible Dischargers - in operation prior to October 30, 2005, but not covered under the MSGP 2000 or another NPDES permit.” “NOI Submission Deadline” “Immediately, to minimize the time discharges from the facility will continue to be unauthorized.”*

The facility has been in operation for 7 years and did not have coverage under the 2000 MSGP. An NOI was submitted on 10/27/2010 for permit coverage under the 2008 MSGP.

2. Per MSGP 5.1.2 Site Description, *“Your SWPPP must include the following:” “locations of all stormwater conveyances including ditches, pipes, and swales;” “locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc),”*

During the facility inspection a floor drain was evident in the battery storage shed. While covered with a roof the walls do not extend to the roof, rain may enter the area and contact the batteries (see photo 1). When asked where the drain discharges, Adam Schaer disclosed it drains to the stormwater inlet. While discussing the issue with Scott Steinberg he replied that the drain was plugged and water would not discharge through it. It is unknown at this time the operational condition of the floor drain.

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	<input type="checkbox"/> N	Missing one quarterly inspection.
Are inspections documented, including: <ul style="list-style-type: none"> • Date and time YES • Name and signature of inspector YES • Weather information and a description of discharge occurring at the time of the inspection YES • Previously unidentified discharges from site NO • Control measures needing maintenance or repairs YES • Failed control measures that need replacement YES • Incidents of noncompliance observed YES • Additional control measures needed. YES 	Y	<input type="checkbox"/> N	
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	<input type="checkbox"/> N	Only one documented.
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. 	<input type="checkbox"/> Y	N	One sample collected during rain event.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: <ul style="list-style-type: none"> • Sample location YES • Sample collection date/time & visual assessment date/time YES • Personnel collecting sample & performing assessment and their signature YES • Nature of the discharge (runoff or snowmelt) YES • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) YES • Probable sources of contamination YES • If applicable, reason for not taking samples within 1st 30 minutes. 	<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	N	N/A
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input checked="" type="checkbox"/>	N	Inspection completed 9/2011.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input checked="" type="checkbox"/>	N	
Cover all areas of the facility?	<input checked="" type="checkbox"/>	N	Very detailed.
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?	<input checked="" type="checkbox"/>	N	

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

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	First and only sample exceed the benchmarks. Actions were completed to reduce pollutant levels.
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"/>	
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
Other Required Monitoring			
<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?	<input checked="" type="checkbox"/>	N	
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	<input checked="" type="checkbox"/>	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?	<input checked="" type="checkbox"/>	N	

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>Materials stored under sheds or in enclosed areas when possible.</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>Procedures are listed in SWPPP; site is orderly and appears to be well managed.</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>Maintenance on forklift performed when 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>Spill procedures and response are discussed in SWPPP. No documentation in SWPPP of any spill event occurring. Emergency numbers and contact personnel listed in SWPPP.</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 covered with asphalt and sheds/building.</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>Runoff discharges down the driveway.</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>Waste containers on site, area well maintained and ordered.</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>Site is covered with asphalt.</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*)

Exterior boundaries on the north and east sides of the Site are slightly built up with concrete or asphalt berms extending to the security fencing to keep stormwater from draining off the site on those sides of the facility. Additionally, the general slope of the Scrap Yard is to the west towards low-lying areas and away from 4th Street.

Site contains numerous sheds and shelters to cover incoming materials.

**NMED/SWQB
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 1/30/2012	Time: 1523 hours
City/County: Albuquerque/ Bernalillo		
Location: 3906 4 th Street NW, Albuquerque, New Mexico, facing east.		
Subject: There is a floor drain in the battery storage shed that may discharge to the stormwater MS4 system in the front of the business. The shed is open at the back for rain to come in.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 1/30/2012	Time: 1517 hours
City/County: Albuquerque/ Bernalillo		
Location: 3906 4 th Street NW, Albuquerque, New Mexico, facing south.		
Subject: Stormwater that falls on the facility flows from the back to the front along a depression into the city MS4 system.		

