



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

Harold Runnels Building, N2050  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, NM 87502-5469  
Phone (505) 827-0187 Fax (505) 827-0160  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)



DAVE MARKLIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

**Certified Mail - Return Receipt Requested**

September 14, 2011

Mr. Walter L. Meech, President  
C & E Concrete, Inc.  
Eagle Ready Mix Concrete  
500 Elkins Road  
Grants, New Mexico 87020

RE: Industrial Storm Water; SIC 3273; NPDES Compliance Evaluation Inspection; Eagle Ready Mix Concrete;  
NPDES Permit No. NMR05H642; August 16, 2011

Dear Mr. Meech:

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>.

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

Sincerely,

*/s/Daniel Valenta*

Daniel Valenta  
Surface Water Quality Bureau

Cc: Marcia Gail Adams, EPA, Enforcement Section (6EN-AS) by e-mail  
Carol Peters-Wagnon, EPA (6EN-WM) by e-mail  
Diana McDonald, EPA (6EN-WM) by e-mail  
Samual Bates, EPA, (6W-AS) by e-mail  
Darlene Whitten-Hill, (6EN-WC) by e-mail

NMED District I by e-mail



**NPDES Compliance Inspection Report**

**Section A: National Data System Coding**

Transaction Code			NPDES										yr/mo/day					Inspec. Type		Inspector		Fac Type							
1	N	2	5	3	N	M	R	0	5	H	6	4	2	11	12	1	1	0	8	1	6	17	18	~	19	S	20	2	
Remarks																													
C O N C C R E T E F A C I L I T Y																													
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)		Entry Time /Date <b>1515 Hours / 8-16-2011</b>	Permit Effective Date <b>9-29-2008</b>
<b>Eagle Ready Mix Concrete: From Interstate 40 in Gallup go north on Hwy 491 for approximately 3 miles to Gamerco. Exit 491 on to Co Rd 7. Concrete site can be seen from the road.</b>		Exit Time/Date <b>1630/ 8-16-2011</b>	Permit Expiration Date <b>9-29-2013</b>
<b>McKinley County</b>			
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)			Other Facility Data
<b>Tom Lambson/ Plant Manager/ 505-722-7794/ cell 505-722-2168</b>			<b>N. 35° 34' 23.31"</b> <b>W. -108 °45' 44.37"</b>
Name, Address of Responsible Official/Title/Phone and Fax Number			SIC 3273 Sector E
<b>Walter L. Meech/ President/ 500 Elkins Rd., Grants, NM 87020/ 505-287-2044/505-240-6699</b>			Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *

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

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

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

- Eagle Ready Mix Concrete has merged with C & E Concrete, Inc. in Grants, NM.**
- An entrance interview was conducted at the site at approximately 1515 hours on August 16, 2011. The inspector presented credentials and discussed the purpose of the inspection. The inspector and Mr. Lambson toured the facility and upon completion a brief exit interview to discuss the preliminary findings of this inspection was conducted. The inspector left the site at approximately 1630 hours on August 16, 2011.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
<b>DANIEL VALENTA /s/Daniel Valenta</b>	<b>NMED/SWQB 505-827-2575</b>	<b>9/14/2011</b>
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
<b>RICHARD E. POWELL /s/Richard Powell</b>	<b>505-827-2798</b>	<b>9/14/2011</b>

National Database Information		General	
Inspection Type	Compliance Evaluation	Inspector Name	Daniel Valenta
NPDES ID Number	NMR05H642	Telephone	505-827-2575
Inspection Date	8/16/2011	Entry Time	1515
Inspector Type (circle one)	EPA <input type="checkbox"/> State <input checked="" type="checkbox"/> EPA Oversight	Exit Time	1630
Facility Sector/ SIC/Activity Code	Sector E/Concrete Plant/3273	Signature	

Facility Location Information			
Name/Location/ Mailing Address	Eagle Ready Mix Concrete/ 712 Crystal Ave, Gamerco, NM 87317/		
GPS Coordinates	Latitude	35° 34' 23.31" N	Longitude 108° 45' 44.37" W
Receiving Water(s)	Gamerco Wash thence to the Puerco River		

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Thomas Lambson/Plant Manager	505-722-7797 Cell 505-240-2147
Facility Contact	Thomas Lambson/Plant Manager	505-722-7797 Cell 505-240-2147
Authorized Official(s)	Walter Meech / President	505-287-2044 505-240-6699

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	unknown		SWPPP Implementation Satisfactory	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
NOI/Application Date	10/28/2010		SWPPP Date	4/1/2009	
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)

<b>SWPPP Review</b>			
<u>General</u>	<b>Notes:</b>		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	SWPPP signed 4/1/2009 NOI submitted 10/28/10
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	
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?	<input checked="" type="checkbox"/>	N	
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	N/A
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/>	N	
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			<b>Notes:</b>
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	Detailed site map.
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?	Y	<input checked="" type="checkbox"/>	Receiving waters not listed on site map.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/>	Old train roadway from site not listed.
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"/>	Per the SWPPP, no spills or leaks have occurred in the last 3 years.
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?	Y	N	n/a
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)

<u>Site Description</u>			<b>Notes:</b>
<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> <li>• Fueling stations <b>Yes</b></li> <li>• Vehicle and equipment maintenance and/or cleaning areas <b>Yes</b></li> <li>• Loading/unloading areas</li> <li>• Locations used for the treatment, storage or disposal of wastes <b>Yes</b></li> <li>• Liquid storage tanks <b>n/a</b></li> <li>• Processing and storage areas <b>Yes</b></li> <li>• Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility <b>Yes</b></li> <li>• Transfer areas for substances in bulk <b>Yes</b></li> <li>• Machinery <b>Yes</b></li> </ul>	<input checked="" type="checkbox"/>	N	
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	N	No run-on.
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 or leaks have occurred in the last 3 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 <b>Yes</b></li> <li>• Description of evaluation criteria <b>Yes</b></li> <li>• List of the outfalls or onsite drainage points directly observed <b>Yes</b></li> <li>• Different types of non-storm water discharges and source locations <b>Yes</b></li> <li>• Actions taken such as a list of control measures for elimination. <b>Yes</b></li> </ul>	<input checked="" type="checkbox"/>	N	
Does salt storage occur at this facility?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input checked="" type="checkbox"/>	
<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	Storm water pond and concrete block perimeter walls, secondary containment, enclosures, and containers.
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 checked="" type="checkbox"/>	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/>	N	Addressed in the SWPPP.
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.  Waste containers are on site to contain and dispose of garbage brought onsite by truck drivers or personnel.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>		<b>Notes:</b>	
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<input type="checkbox"/> N	No schedule for pickup, disposal of wastes performed as needed.
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	N	Activities described in SWPPP.
Does the SWPPP include a schedule for preventative maintenance procedures?	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 checked="" type="checkbox"/> Y	N	Addressed in SWPPP.
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	N	Addressed in detail.
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/> Y	N	Training addressed in SWPPP.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	N	Addressed in detail.

## 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	High concrete block wall around low side of facility.
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
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/>	N	Training material and signatures.
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"/>	No supporting documentation.
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	Site clean and ordered.
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	<input checked="" type="checkbox"/>	Offsite tracking may be a problem when site is wet.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/>	N	With the use of barriers and ponds.

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### Introduction

On August 16, 2011, Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at a Ready Mix Concrete facility located in Gamarco, NM. The facility is approximately 2.5 miles north of Gallup, New Mexico. The purpose of this inspection was to document the facility's status regarding the National Pollution Discharge Elimination System (NPDES) permit requirements for "stormwater discharges associated with industrial activity" under 40 Code of Federal Regulations (CFR) 122.26(b)(14). This site may have industrial activities being conducted that meet the descriptions in Section E (Glass, Clay, Cement, Concrete and Gypsum Products) of the 2008 Multi-Sector General Permit (MSGP). Additional information from the U.S. Environmental Protection Agency (USEPA) on the Multi-Sector General Permit, factsheet and how to apply is available at [http://cfpub1.epa.gov/npdes/stormwater/msgp.cfm#permit\\_factsheet](http://cfpub1.epa.gov/npdes/stormwater/msgp.cfm#permit_factsheet). This CEI report is based on on-site observation by NMED personnel and verbal information provided by Mr. Thomas Lambson, Plant Manager.

#### Process Summary

The Eagle Ready Mix Concrete Plant conducts several activities comprising the ready mix batching process. Raw components are delivered to the plant and placed at storage locations. Ingredients are added to truck mixing drums through a chute at the rear of the truck. After loading, the truck moves to a wash area where the driver uses a hose to wash down the truck exterior. The truck then proceeds to deliver the concrete load to the customer. In addition to the exterior truck wash, a non-acid biodegradable concrete cleaner solution is occasionally used to remove persistent concrete residues. Waste residual concrete which may be left in the truck drum following delivery is minimized by pouring in concrete forms for use on site or at the back of the plant where it is discarded on the ground. This area is enclosed by cement blocks to minimize runoff. The truck drum is then washed to avoid settling of concrete in the drum. The final wash is completed by the driver using a hose and the contents discharged to the truck wash catchment area. Through the center of the truck /fill and wash area is a depression that drains to a containment pond. The containment pond has a high water overflow pipe that discharges to Gamarco Wash, discharge outfall 001. It is from this outfall samples will be taken should a discharge occur.

#### Note:

Per 2.1.2.10 Non-Stormwater Discharges. *"You must eliminate non-stormwater discharges not authorized by an NPDES permit. See Part 1.2.3 for a list of non-stormwater discharges authorized by this permit."*

**Concrete wash solution does not meet the allowable non-stormwater exceptions, it is not permitted in the discharge.**

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
<b>Routine Facility Inspections</b>			
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"> <li>• Date and time <b>No</b></li> <li>• Name and signature of inspector <b>Yes</b></li> <li>• Weather information and a description of discharge occurring at the time of the inspection <b>No</b></li> <li>• Previously unidentified discharges from site <b>Yes</b></li> <li>• Control measures needing maintenance or repairs <b>Yes</b></li> <li>• Failed control measures that need replacement <b>Yes</b></li> <li>• Incidents of noncompliance observed <b>Yes</b></li> <li>• Additional control measures needed. <b>Yes</b></li> </ul>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Y	N	All Inspection reports in SWPPP.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>• Collected in a clean, clear glass or plastic container.</li> </ul>	Y	N	No samples collected, no discharge documented.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections</b>			
Are assessments documented, including: <ul style="list-style-type: none"> <li>• Sample location <b>No</b></li> <li>• Sample collection date/time &amp; visual assessment date/time <b>Yes</b></li> <li>• Personnel collecting sample &amp; performing assessment and their signature <b>Yes</b></li> <li>• Nature of the discharge (runoff or snowmelt) <b>Yes</b></li> <li>• Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) <b>Yes</b></li> <li>• Probable sources of contamination <b>Yes</b></li> <li>• If applicable, reason for not taking <b>Yes</b> samples within 1<sup>st</sup> 30 minutes.</li> </ul>	Y	<input checked="" type="checkbox"/>	
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	N	N/A
<b>Comprehensive Site Inspections</b>			
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input checked="" type="checkbox"/>	No Comprehensive Inspections in SWPPP
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	N	No documentation to review.
Cover all areas of the facility?	Y	N	No documentation to review.
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	Y	N	No documentation to review.

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

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring (Part 6)</b>			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input checked="" type="checkbox"/> Y	N	
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	Unknown, no samples ever taken.
<b>Benchmark Monitoring</b>			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>• Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall</li> <li>• Prior to commingling.</li> </ul>	Y	N	No sample collected, no discharge.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	No samples ever collected.
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	No samples ever collected.

## NPDES Industrial Storm Water Checklist (MSGP)

<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	No samples ever collected.
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	No samples ever collected.
<b>Effluent Limitations Monitoring</b>			
Sampled once per year?	Y	N	No samples ever collected.
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	No samples ever collected.
<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	No monitoring data ever acquired.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	N	No documented annual report in SWPPP.
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>All processing of raw materials, loading and unloading, and equipment fueling are performed outdoors. Facility has large covered sheds for the storage of chemicals, maintenance, and repair of equipment.</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 ordered.</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>Repairs and preventative maintenance described in SWPPP. Covered sheds present for the storage and repair of equipment.</p>

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Implementation</b>	
<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>Spill procedures and response are discussed in SWPPP. No documentation in SWPPP of any spill event occurring.</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>The facility has a perimeter berm on the low side of the property which acts as an erosion and sediment control. Central channel to collect water and contain in pond.</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>See above.</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>N/A</p>

## NPDES Industrial Storm Water Checklist (MSGP)

<b>SWPPP Implementation</b>	
<b>Waste, Garbage and Floatable Debris</b>	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>The site appeared clean and ordered.</p>
<b>Evidence of non-storm water discharges</b>	<p>No, all flush and cleaning water contained, concrete cleaning solution drains into central containment pond.</p>
<b>Dust Generation and Vehicle Tracking of Industrial Materials</b>	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>There are no BMP's in place to prevent the tracking of materials offsite.</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)*

1. Drainage system: The active areas of the site, loading and cleaning, are sloped so all storm water and non-storm water flows are directed to a central storage pond.
2. Containment berms: Large cement blocks have been arranged along the down slope perimeter to minimize all storm water and non-storm water flows.