



SUSANA MARTINEZ  
Governor  
JOHN 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



DAVE MARTIN  
Secretary  
RAJ SOLOMON, P.E.  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

February 17, 2011

Honorable Alfonso E. Ortiz, Mayor  
City of Las Vegas  
905 12<sup>th</sup> Street  
Las Vegas, NM 87701

**Re: Industrial Storm Water; SIC 4952; NPDES; Compliance Evaluation Inspection;  
NMR05H827; January 27, 2011**

Dear Mayor Ortiz,

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

Sincerely,

*/s/Daniel Valenta*

Daniel Valenta  
Environmental Scientist/Specialist  
Surface Water Quality Bureau

cc: Marcia Adams, USEPA (6EN-AS) by e-mail  
Samuel Bates, USEPA (6SF) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Diana McDonald, USEPA (6EN-WM) by e-mail  
NMED District II, 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 8 2 7 11 12 1 1 0 1 2 7 17 18 ~ 19 S 20 2					
Remarks					
W A S T E W A T E R T R E A T M E N T P L A N T					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 [ ] [ ] [ ] 69	70 2	71 N	72 N	73 [ ] [ ]	74 75 [ ] [ ] [ ] [ ] [ ] [ ] 80

#### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date 0910 hours/1-27-2011	Permit Effective Date September 29, 2008
Las Vegas WWTP, San Miguel County – From Santa Fe I-25 North. Exit at first Las Vegas exit, turn right at stop sign, follow the frontage road south to the first left (marked with sign for WWTP).	Exit Time/Date 1145 hours/1-27-2011	Permit Expiration Date September 29, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
Mr. Estevan Medina, Wastewater Supervisor (505)617-1097 Mr. Robert Espinoza, Laboratory Technician (505)429-9950	GPS: N. 35° 34' 02.58" W. -105° 12' 48.30"	
Name, Address of Responsible Official/Title/Phone and Fax Number	SIC: 5952 Activity code: TW	
Honorable Alfonso E. Ortiz, City of Las Vegas, 905 12 <sup>th</sup> Street, Las Vegas, NM 87701/ Mayor/ (505)454-1401	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)

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

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

1. FACILITY DID NOT HAVE REQUIRED NPDES PERMIT COVERAGE ON DAY OF INSPECTION, NOI ACCEPTED ON 1/28/2011.
2. SEE ATTACHED REPORT AND FURTHER EXPLANATION.

Name(s) and Signature(s) of Inspector(s) Daniel Valenta <i>/s/Daniel Valenta</i>	Agency/Office/Telephone/Fax NMED/SWQB/505-827-2575	Date 2/16/2011
Signature of Management QA Reviewer Richard E. Powell <i>/s/Richard Powell</i>	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798	Date 2/16/2011

## NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>		<u>General</u>	
Inspection Type	Compliance Evaluation	Inspector Name	Daniel Valenta
NPDES ID Number	NMR05H827	Telephone	505-827-2575
Inspection Date	1/27/2011	Entry Time	0910
Inspector Type <i>(circle one)</i>	EPA <input type="checkbox"/> State     EPA Oversight	Exit Time	1145
Facility Sector/ SIC/Activity Code	Treatment Works/WWTP/4952	Signature	

<u>Facility Location Information</u>			
Name/Location/ Mailing Address	Las Vegas Wastewater Treatment Plant 462 S. Frontage Rd. Las Vegas, NM 87701		
GPS Coordinates	Latitude	35° 34' 02.58" N	Longitude     105° 12' 48.30" W
Receiving Water(s)	Gallinas River in 20.6.4.220 of the Pecos River Basin		

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Las Vegas Wastewater Treatment Facility	505-454-3832
Facility Contact	Mr. Estevan Medina - Wastewater Supervisor	505-426-3333
	Mr. Robert Espinoza – Laboratory Technician	505-429-9950
Authorized Official(s)	Honorable Alfonso Ortiz – Mayor	505-454-1401

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
Permit Coverage	Y	<input type="checkbox"/> N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	N
Permit Type	<input checked="" type="checkbox"/> General	Individual	SWPPP Contents Satisfactory	Y	<input type="checkbox"/> N
Operational Date	unknown		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	01/28/11		SWPPP Date	10/2010	
If applicable, is no exposure certification on file?	Y	<input 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	
Copy of the NOI and acknowledgment letter from EPA?	Y	<input checked="" type="checkbox"/>	No acknowledgment letter from EPA.
Copy of the permit language?	Y	<input checked="" type="checkbox"/>	Expired 2000 permit in SWPPP.
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	<input checked="" type="checkbox"/>	No past reports/inspections retained, provided.
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> <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, facility active 24/7.
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	<input checked="" type="checkbox"/>	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input checked="" type="checkbox"/>	N	Endangered species documentation provided. Criterion A selected.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	N/A
Did all "operators" sign/certify the SWPPP?	Y	<input checked="" type="checkbox"/>	SWPPP not signed by authorized official.
Is the storm water pollution prevention team identified (name or title)?	Y	<input checked="" type="checkbox"/>	Team Coordinator not identified by name or title. Team members listed.
Are the storm water pollution prevention team's responsibilities identified?	Y	<input checked="" type="checkbox"/>	Team Coordinator not identified by name or title. Team members listed.

## 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	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/>	Not on site map, in narrative under site description.
Does the site map contain the location and extent of significant structures and impervious surfaces?	Y	<input checked="" type="checkbox"/>	Not on site map, in narrative under site description.
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 stream TMDL status not described on map, detailed under site description.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input checked="" type="checkbox"/>	Site map does not contain locations of outfalls.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	Y	<input checked="" type="checkbox"/>	Satellite overview, shows structures not what or where pollutants are stored or located.
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	<input checked="" type="checkbox"/>	SWPPP reports no significant spills or leaks have occurred.
Does the site map contain locations of all storm water monitoring points?	Y	<input checked="" type="checkbox"/>	Outfall monitoring locations not noted.
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"/>	Outfall monitoring locations not noted.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	<input checked="" type="checkbox"/>	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input checked="" type="checkbox"/>	Underground pipe discharging, unknown if groundwater or process water.

## 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</li> <li>• Vehicle and equipment maintenance and/or cleaning areas</li> <li>• Loading/unloading areas</li> <li>• Locations used for the treatment, storage or disposal of wastes</li> <li>• Liquid storage tanks</li> <li>• Processing and storage areas</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</li> <li>• Transfer areas for substances in bulk</li> <li>• Machinery</li> </ul>	Y	<input type="checkbox"/> N	Map does not detail what activities are occurring at what building or area.
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	Map does not show the run-on of storm water from the road leading into the WWTP.
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?	Y	<input type="checkbox"/> N	SWPPP documents areas where industrial materials or activities are exposed to storm water but does not document any non-storm water releases.
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 does not document any spills or leaks.

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> <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>	<input checked="" type="checkbox"/>	N	SWPPP contains statement that no non-storm water discharges have occurred.
Does salt storage occur at this facility?	<input checked="" type="checkbox"/>	N	Stored indoors.
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	<input checked="" type="checkbox"/>	No documentation of 2000 permit in place.
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/>	N	Silt fences, culverts, and inlets swales will be used.
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	Y	<input checked="" type="checkbox"/>	No documentation on why certain BMP's are used.
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?	Y	<input checked="" type="checkbox"/>	
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)?	Y	<input checked="" type="checkbox"/>	SWPPP does not describe training and practices to keep site orderly and clean.

## 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	Describes routine monthly/quarterly inspections of site.
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	N	Activities described in SWPPP.
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input 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"/> Y	N	SWPPP describes inspection and maintenance of all storage tanks and procedures should a spill occur.
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	Y	<input 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"/> 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	SWPPP describes procedures for controlling, cleaning, and checking for spills or releases.
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/> Y	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	N	

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>		Notes:	
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	Majority of site covered by buildings or impervious cover. Unused portions of site stabilized by native vegetation.
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	<input checked="" type="checkbox"/>	Native vegetation surrounding the plant help contain and settle out pollutants.
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?	<input checked="" type="checkbox"/>	N	Brine products are stored indoors.
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	Site training included stormwater control and maintenance on BMP's.
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<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	Majority of site paved, or covered with grass. Sludge drying beds open to elements, run off and dust generation is possible.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	N	<b>Unknown</b> at this time if the discharge from the underground storm water drain is uncontaminated groundwater or process water/ groundwater.

## NPDES Industrial Storm Water Checklist (MSGP)

### Introductions:

On January 27, 2011 a Compliance Evaluation Inspection was conducted at the City of Las Vegas Waste Water Treatment Plant (WWTP) by Daniel Valenta and accompanied by Erin Trujillo of the State of New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the operator's status regarding the NPDES multi-sector general storm water permit (MSGP) for industrial activities. This facility has industrial activities being conducted on-site that meet the description of industrial activities in Sector T of the MSGP and storm water regulations at **40 Code of Federal Regulations (CFR) Part 122.26**.

An entrance interview was conducted with Robert Espinoza, Laboratory Technician/Supervisor/Waste Water Operator IV at approximately 0910 hours on January 27, 2011. The inspector made introductions, presented his credentials and discussed the purpose of the inspection. Mr. Esteban Medina, Waste Water Supervisor, joined the inspectors during the facility inspection. An exit interview to discuss the preliminary findings of this inspection was conducted at approximately 1145 hours on January 27, 2011 with Mr. Medina and Mr. Espinoza. This report is based on a review of the files maintained by the permittee and NMED, on-site observation by NMED personnel and verbal information provided by Mr. Espinoza and Mr. Medina.

### Site Description:

The Las Vegas Waste Water Treatment Plant (WWTP) at Las Vegas, NM is located off of the frontage road approximately half a mile east of I-25. The facility is surrounded by private lands and within the jurisdiction of San Miguel County. It is approximately 5.3 acres and has a design capacity of 2.5 million gallons per day, located near the Gallinas River and discharges treated effluent into the river under NPDES permit NM0028827. Of the 5.3 acres, approximately 48 percent, or 2.53 acres, have impervious surfaces. This area includes the roadway around the WWTP, the laboratory building, head works, clarifiers, and digester.

### Major Finding:

1. No Team Coordinator was identified to lead/direct the various activities.
2. NOI was signed by Estevan Medina, Wastewater Supervisor. Per B.11.3, Mr. Medina does not meet the requirements to file for an NOI. *"For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official."*
3. Discharger in operation prior to October 30, 2005 but not covered under the MSGP 2000 or another NPDES permit. Deadline to submit NOI. Immediately, to minimize the time discharges from the facility will continue to be unauthorized.
4. The different discharge outfalls are not identified and given a unique label. SWPPP does not address in the sampling plan how the different outfalls will be sampled. If one outfall is to be used what is the reasoning to suggest it is representative of the other outfalls.
5. There is a question as to the origin and nature of the discharge from the underground storm water pipe discharging to the surface water and thus to the Gallinas River.
6. SWPPP addresses the need for further improvements to silt fence containment, improvements not completed as of date of this inspection.

## 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?	Y	<input checked="" type="checkbox"/> N	Facility filed for permit on 1/28/11.  The facility did not have required coverage under the previous 2000-2005 Multi-Sector General Permit.
Are inspections documented, including: <ul style="list-style-type: none"> <li>• Date and time</li> <li>• Name and signature of inspector</li> <li>• Weather information and a description of discharge occurring at the time of the inspection</li> <li>• Previously unidentified discharges from site</li> <li>• Control measures needing maintenance or repairs</li> <li>• Failed control measures that need replacement</li> <li>• Incidents of noncompliance observed</li> <li>• Additional control measures needed.</li> </ul>	Y	<input checked="" type="checkbox"/> N	No routine quarterly inspections performed.
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 checked="" type="checkbox"/> N	Facility filed for permit on 1/28/11.  The facility did not have required coverage under the previous 2000-2005 Multi-Sector General Permit.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> <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	<input checked="" type="checkbox"/> N	No samples collected.

## 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	No samples collected yet.
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"/> N	Permit acquired on 1/28/11.  The facility did not have required coverage under the previous 2000-2005 Multi-Sector General Permit.
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	No inspections performed.
<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	No inspections performed.

## 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	No sector-specific benchmark requirements.
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input checked="" type="checkbox"/> Y	N	
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 benchmark monitoring required.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	No benchmark monitoring required.
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	No benchmark monitoring required.

## 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 benchmark monitoring required.
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 benchmark monitoring required.
<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	<input type="checkbox"/> N	No monitoring data ever analyzed.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input type="checkbox"/> N	No annual report completed or submitted for review.
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	<input type="checkbox"/> N	No monitoring data ever acquired.

## 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, are done outdoors. Sludge drying beds open to rainwater. Beds sloped towards drains but loose sludge scattered outside containment. Collection system for trapping and containing stormwater not completed.</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>Good Housekeeping procedures are not addressed in the SWPPP.</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 addressed in SWPPP. Logbook kept for daily repairs and maintenance performed.</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>Site is open to rainwater, no berms in place to prevent run-on of rainwater from main road onto site.</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>Due to a high groundwater table at the WWTP the facility has been designed to shed/discharge storm water as quickly as possible. With multiple open discharge points, silt fences and drainage culverts were discussed in SWPPP, as of the date of the inspection only an unmaintained silt fence along the sludge beds is in place. Additional BMP's discussed in SWPPP not implemented.</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>Brine is stored indoors.</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 was orderly and clean.</p>
<b>Evidence of non-storm water discharges</b>	<p>An underground collection pipe was discharging a slow stream of water on a dry day. It is unknown where this water comes from and what it does or does not contain.</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>Majority of site is paved; sludge drying beds and material tracked from them may generate dust, not addressed in SWPPP.</p>

**NMED/SWQB  
Official Photograph**

Photographer: Daniel Valenta	Date: 1/27/2011	SWPPP Site Map
City/County: Las Vegas/San Miguel County		
Location: Las Vegas WWTP at 462 S. Frontage Rd, Romerville, Las Vegas, New Mexico		
Subject: Site map of facility detailing outfalls and flow patterns. Inspector added arrows to aid site review.		

