



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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

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**Certified Mail - Return Receipt Requested**

March 15, 2011

Mr. Vernon Wilson, Airport Manager  
Dona Ana County Airport  
845 North Motel Boulevard  
Las Cruces, New Mexico 88007

**RE: Industrial; Storm Water; SIC 4581; NPDES Compliance Evaluation Inspection; Dona Ana County; Airport; Santa Teresa, NM; NMR05HA78; February 24, 2011**

Dear Mr. Wilson:

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

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

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

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

Sincerely,

/s/ RICHARD E. POWELL

Richard E. Powell

Surface Water Quality Bureau

CC: Samuel Tate, USEPA (6EN-AS) by email  
Carol Peters-Wagnon, USEPA (6EN-WM) by email  
Marcia Gail Adams, USEPA (6EN-AS) by email  
Diana McDonald, USEPA (6EN-WM) by email  
NMED, District III Las Cruces by email  
Mr. Brian Haines, County Manager, Dona Ana County by email



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

**NPDES Compliance Inspection Report**

**Section A: National Data System Coding**

Transaction Code			NPDES										yr/mo/day				Inspec. Type		Inspector		Fac Type								
1	N	2	5	3	N	M	R	0	5	H	A	7	8	11	12	1	1	0	2	2	4	17	18	~	19	S	20	2	
Remarks																													
A				I				R				P				O				R				T					
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----													
67						70	3							71	N	72	N	73											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) DONA ANA COUNTY AIRPORT, 8000 AIRPORT ROAD, SANTA TERESA, NM DONA ANA COUNTY		Entry Time /Date 1000/2-24-11	Permit Effective Date 9-29-08
		Exit Time/Date 1145/2-24-11	Permit Expiration Date 9-29-13
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) VERNON WILSON, AIRPORT MANAGER 575-644-2358		Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number VERNON WILSON, AIRPORT MANAGER, DONA ANA COUNTY AIRPORT, 845 NORTH MOTEL BOULEVARD, LAS CRUCES, NEW MEXICO 88007		LAT 31 52 32.9 LONG -106 41 57.0 SIC 4581	
		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

**Section C: Areas Evaluated During Inspection**

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

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

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

- FACILITY HAD NOT APPLIED FOR AND RECEIVED REQUIRED NPDES PERMIT COVERAGE ON THE DATE OF THIS INSPECTION. FILED AN NOI ON 3-1-2011 AND RECEIVED PERMIT TRACKING #NMR05HA78. THE FACILITY PREPARED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP) DATED JUNE 2009. ALTHOUGH NOT AVAILABLE ON THE DATE OF THIS INSPECTION, THE SWPPP WAS FORWARDED TO NMED ON 2-28-2011 AND WAS REVIEWED FOR THIS REPORT.
- AN EXIT INTERVIEW TO DISCUSS THE PRELIMINARY FINDINGS OF THIS INSPECTION WAS CONDUCTED WITH MR. WILSON FROM APPROXIMATELY 1130 - 1145 HOURS ON FEBRUARY 24, 2011 AT THE SITE.
- SEE REPORT AND FURTHER EXPLANATIONS.

/s/ RICHARD E. POWELL	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2798	Date 3-15-11
Signature of Management QA Reviewer /s/ STEVEN M. BAUMGARN	Agency/Office/Phone and Fax Numbers NMED/SWQB 575-647-7981	Date 3-15-11

## NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>			<u>General</u>	
Inspection Type	Compliance Evaluation		Inspector Name	Richard E. Powell
NPDES ID Number	NMR05HA78		Telephone	(505) 827-2798
Inspection Date	2/24/2011		Entry Time	1000/2-24-11
Inspector Type <i>(circle one)</i>	EPA	State	Exit Time	1145/2-24-11
Facility Sector/ SIC/Activity Code	S/4581		Signature	<i>/s/ RICHARD E. POWELL</i>

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	Dona Ana County Airport, 8000 Airport Road, Santa Teresa, NM 88008			
GPS Coordinates	Latitude	31 52 32.9	Longitude	-106 41 57.0
Receiving Water(s)	Unnamed tributary to the Rio Grande in Segment 20.6.4.101 NMAC of the Rio Grande Basin			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Dona Ana County Airport	575-644-2358
Facility Contact	Vernon Wilson, Airport Manager	575-644-2358
Authorized Official(s)	Brian Haines, County Manager (signed NOI)	575-647-7201

<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	<input type="checkbox"/> N
Permit Type	General	Individual	SWPPP Contents Satisfactory	Y	<input type="checkbox"/> N
Operational Date			SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	3-1-2011		SWPPP Date	6-2009	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/>	N	Prepared by Martich Professional Services, PLLC.
Copy of the NOI and acknowledgment letter from EPA?	Y	<input checked="" type="checkbox"/>	NOI and acknowledgement not in the SWPPP and dated 3-1-2011, after the inspection.
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?	Y	<input checked="" type="checkbox"/>	
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	NA
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	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/>	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	NA
Did all "operators" sign/certify the SWPPP?	Y	<input checked="" type="checkbox"/>	Copy reviewed does not have a signature but original may.
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/>	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/>	N	

## NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/> Y	N	
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain the size of the property in acres?	Y	<input checked="" type="checkbox"/> N	But SWPPP states the total area of the facility is 1,718 acres.
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/> Y	N	But may need to update map to incorporate changes due to new construction.
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/> Y	N	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	<input checked="" type="checkbox"/> N	Map only shows locations – SWPPP lists DACA-001 & DACA-002.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	NA
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	NA

## NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> <li>• Fueling stations <b>YES</b></li> <li>• Vehicle and equipment maintenance and/or cleaning areas <b>YES</b></li> <li>• Loading/unloading areas <b>YES</b></li> <li>• Locations used for the treatment, storage or disposal of wastes <b>YES</b></li> <li>• Liquid storage tanks <b>YES</b></li> <li>• Processing and storage areas <b>NA</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?	<input checked="" type="checkbox"/>	N	
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 checked="" type="checkbox"/>	There are no allowable non-storm water discharges documented in the SWPPP.
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?	<input checked="" type="checkbox"/>	N	

## 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>3-6-2009</b></li> <li>• Description of evaluation criteria <b>Y</b></li> <li>• List of the outfalls or onsite drainage points directly observed <b>Y</b></li> <li>• Different types of non-storm water discharges and source locations <b>NA</b></li> <li>• Actions taken such as a list of control measures for elimination. <b>NA</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	N	NA
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/>	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	
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	

## 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	
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	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input type="checkbox"/> N	Only inspection schedules.
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/> Y	N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<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	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	Y	N	Unknown since there are no training records referenced or included in the SWPPP.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	N	Yes for small spills but unknown for larger spills since the SWPPP states that "DACA will follow their Spill Prevention, Control, and Countermeasures Plan" which was not available on the date of this inspection.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Controls to Reduce Pollutants</b>			<b>Notes:</b>
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/>	N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	<input checked="" type="checkbox"/>	N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	<input checked="" type="checkbox"/>	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	NA
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/>	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?	Y	N	Although this training is addressed in the SWPPP, it is unknown whether training actually occurs since there are no training records referenced or included in the SWPPP.
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/>	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/>	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	N	NA

## NPDES Industrial Storm Water Checklist (MSGP)

### Notes on SWPPP Review

#### **Site Description:**

The Dona Ana County Airport (DACA) at Santa Teresa is a public airport listed as a General Aviation Reliever to El Paso International Airport. There are several tenants at this facility (list attached), some of which may need storm water permit coverage. According to EPA's NOI database, none of the potentially regulated tenants currently have permit coverage. DACA had coverage under the 2000 MSGP (tracking #NMR05B170) but failed to get coverage under the 2008 MSGP by January 5, 2009 as required. A complete NOI was filed after this inspection on March 1, 2011 and is pending.

There was no SWPPP available for review on the date of this inspection. A SWPPP for the airport was prepared in November 2006 and amended in June 2009 to "revise the SWPPP to include contents required by the 2008 MSGP; and update the SWPPP to reflect current operations at the DACA." Copies of both were forwarded to NMED after the inspection and were reviewed for this report.

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Inspections (Part 4)</b>			
<u>General</u>	<b>Notes:</b>		
<b>Routine Facility Inspections</b>			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	<input checked="" type="checkbox"/> N	There is no documentation in the SWPPP available to the inspector that any required periodic inspections have been conducted.
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	N	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>• Inactive and unstaffed sites</li> </ul>	Y	N	NA
<b>Quarterly Visual Assessment</b>			
Are quarterly visual assessments conducted?	Y	<input checked="" type="checkbox"/> N	There is no documentation in the SWPPP available to the inspector that any required assessments have been conducted.
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	

## 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	N	
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> <li>• Adverse weather conditions</li> <li>• Climates with irregular storm water runoff</li> <li>• Areas subject to snow</li> <li>• Substantially identical outfalls (per 5.1.5.2)</li> <li>• Inactive and unstaffed sites.</li> </ul>	Y	<input checked="" type="checkbox"/> N	
<b>Comprehensive Site Inspections</b>			
Are comprehensive site inspections conducted annually (start 9/29/09)?	Y	<input checked="" type="checkbox"/> N	There is no documentation in the SWPPP available to the inspector that any required comprehensive inspections have been conducted.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	N	
Cover all areas of the facility?	Y	N	
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	Y	N	NA

## 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>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	

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring (Part 6)</b>			
<u>General</u>	<b>Notes:</b>		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	NA
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	NA
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	NA
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	NA
<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	Since this facility does not conduct deicing/anti-icing operations, benchmark monitoring is not required for this subsector (S1).
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	NA
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	NA

## 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	NA
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	NA
<b>Effluent Limitations Monitoring</b>			
Sampled once per year?	Y	N	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	
<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	
<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	NA
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/>	No annual reports are documented in the SWPPP available to the inspector.
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	N	NA