



NEW MEXICO
ENVIRONMENT DEPARTMENT
Surface Water Quality Bureau

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 Governor

JOHN SANCHEZ
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March 11, 2011

DAVE MARTIN
 Secretary

RAJ SOLOMON, P.E.
 Deputy Secretary

Francisco (Miguel) Melendez, Agent and Organizer
 Sangre De Cristo Gravel Products, LLC
 49 NM 250 Box 5
 Las Vegas, New Mexico 87701

RE: Industrial Storm Water, SIC 3273 & 2951, NPDES Compliance Evaluation Inspection, Sangre De Cristo Gravel Products, LLC, NMU001714, February 15, 2011

Mr. Melendez:

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, 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 the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Marcia Gail Adams (6EN-AS)
 U.S. Environmental Protection Agency
 Allied Bank Tower
 Region VI Enforcement Branch
 1445 Ross Avenue
 Dallas, Texas 75202-2733

Program Manager
 New Mexico Environment Department
 Surface Water Quality Bureau
 Point Source Regulation Section
 P.O. Box 5469
 Santa Fe, New Mexico 87502

I appreciate Mr. Lorenzo Melendez, Manager, Sangre De Cristo Gravel Products, LLC, cooperation during this inspection. If you have any questions about this inspection report, please contact me at (505) 827-0418.

Sincerely,

/s/Erin S. Trujillo
 Erin S. Trujillo
 Surface Water Quality Bureau

cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail
 Samuel Tates, EPA (6EN-AS) by e-mail
 Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
 Diana McDonald, USEPA (6EN-WM) by e-mail
 Robert Italiano NMED District II Manager by e-mail
 Lorenzo Melendez, Manager, Sangre De Cristo Gravel Products, LLC by e-mail



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 U 0 0 1 7 1 4 11 12 1 1 0 2 1 5 17 18 ~ 19 S 20 2					
Remarks					
R E A D Y - M I X C O N C R E T E & A S P H A L 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) Sangre De Cristo Gravel Products, LLC, 1109 Airport Road (NM 250), Las Vegas, NM. From I-25, take exit 347 to NM 250, facility on left. San Miguel County	Entry Time /Date 1250 hrs / 02/15/2011	Permit Effective Date September 29, 2008
	Exit Time/Date 1545 hrs / 02/15/2011	Permit Expiration Date September 29, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Lorenzo Melendez, Manager, Sangre De Cristo Gravel Products, LLC / 505-425-8833 and fax 505-425-7699 / lorenzoM100@yahoo.com	Other Facility Data Latitude 35.628164° Longitude -105.198337°	
Name, Address of Responsible Official/Title/Phone and Fax Number Francisco (Miguel) Melendez, Sangre De Cristo Gravel Products, LLC, 49 NM 250 Box 5, Las Vegas, New Mexico 87701 / Agent and Organizer / 505-850-6839 / mmelendez100@yahoo.com	Yes <input type="checkbox"/> * <input checked="" type="checkbox"/> No <input type="checkbox"/>	SIC 3273 & 2951

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
M	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	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) Sangre De Cristo Gravel Products, LLC, operator of ready-mix concrete and asphalt mixture manufacturing activities, did not obtain coverage under the USEPA NPDES industrial stormwater 2008 Multi-Sector General Permit (MSGP) by the deadline of January 5, 2009 or the date of this inspection.
- 2) The operator's Stormwater Pollution Prevention Plan (SWPPP) and implementation was unsatisfactory to meet 2008 MSGP requirements.
- 3) See attached further explanations, checklist and photo log.
- 4) Following this inspection, the operator submitted an eNOI (NPDES Tracking No. NMR05HB30) to obtain permit coverage on March 4, 2011.

Name(s) and Signature(s) of Inspector(s) Erin S. Trujillo /s/Erin S. Trujillo	Agency/Office/Telephone/Fax NMED/SWQB/505-827-0418	Date 03/11/2011
Signature of Management QA Reviewer Richard E. Powell /s/Richard E. Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798	Date 03/11/2011

Sangre De Cristo Gravel Products, LLC
Compliance Evaluation Inspection – Industrial Stormwater
NPDES Tracking No. NMU001714
February 15, 2011

Further Explanations

Introduction

On February 15, 2011, a Compliance Evaluation Inspection (CEI) was conducted at Sangre de Cristo Gravel Products, LLC in Las Vegas, New Mexico by Erin S. Trujillo, accompanied by Daniel Valenta, both of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the operator's status regarding the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges associated with industrial activity under 40 Code of Federal Regulations (CFR) 122.26 and the industrial stormwater Multi-Sector General Permit (MSGP).

Upon arrival at 1250 hours on February 15, 2011, the inspector made introductions, stated the purpose of the inspection and presented credentials to Mr. Lorenzo Melendez, Manager, Sangre De Cristo Gravel Products, LLC. Mr. Lorenzo Melendez gave permission to the inspectors to tour the facility unescorted. Following the tour, an on-site exit interview to discuss preliminary findings was conducted with Mr. Lorenzo Melendez. The inspectors left the facility at approximately 1545 hours on the day of the inspection. Mr. Miguel Melendez was contacted to discuss preliminary findings on February 16, 2011.

This report is based on review of EPA's on-line notice of intent (eNOI) database, files maintained by the operator and NMED, and on-site observation by NMED personnel, and verbal information provided by the on-site operator representative.

Clean Water Act (CWA) and Industrial Stormwater Permit Requirements

Section 301 (a) of the Federal Water Pollution Control Act states that *"Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this Act, the discharge of any pollutant by any person shall be unlawful."*

Federal regulations in 40 CFR Part 122.21(a) Duty to apply (1) states: *"Any person who discharges or proposes to discharge pollutants...must submit a complete application to the Director in accordance with this section and part 124 of this chapter."*

Eleven (11) categories of stormwater discharges associated with industrial activity are identified in 40 CFR 122.26(b)(14)(i)-(xi) that require coverage under an NPDES permit. Category Two (ii) includes facilities with Standard Industrial Classification (SIC) group 29 (petroleum & coal products) and group 32 (stone, clay & glass production). **The facility had ready-mixed concrete (SIC 3273) and asphalt paving manufacturing (SIC 2951) activities on-site that meet the descriptions in Category 40 CFR 122.26(b)(14)(ii), and Sector D (Asphalt Paving Materials) and E (Concrete Products) of the MSGP on the day of this inspection.**

USEPA's MSGP was re-issued effective September 29, 2008 (Federal Register/Vol. 73, No. 189/Monday, September 29, 2008 pg. 56572) and replaced the 2000 MSGP which expired on October 30, 2005. To obtain permit coverage under the MSGP, an operator must complete a Stormwater Pollution Prevention Plan (SWPPP) that among other things documents eligibility for permit coverage, and submit a Notice of Intent (NOI) to the USEPA. More information on USEPA's MSGP permit is available at http://cfpub1.epa.gov/npdes/stormwater/msgp.cfm#permit_factsheet.

On-site Industrial Activity and Background

Sangre De Cristo Gravel Products, LLC (owner/operator) purchased the approximately 20-acre Sierra Transit Mix, Inc. facility on March 2, 2007 according to Mr. Miguel Melendez. On-site activities for the asphalt and ready-mix concrete manufacturing included outside storage and stockpiling of materials, material handling, concrete washout, vehicle maintenance and fueling. No cement manufacturing activities existed on-site on the day of this inspection. The operator also had construction equipment maintenance and storage activities on-site. Co-located industrial and construction yard activities were not physically separated at the site according to the on-site operator representative.

The operator hired Paradigm Engineering, P.L.L.C. Lewisville, Texas to prepare a SWPPP under the 2000 MSGP. A pre-SWPPP site evaluation was documented on September 14, 2007. The SWPPP was completed on November 8, 2007 and signed and certified by a responsible official of Sangre de Cristo Gravel Products, Inc. on November 20, 2007. A copy of a completed NOI dated 2007 (exact date unreadable) and certified mail slip to EPA's processing center stamped November 23, 2007 were contained in the SWPPP. However, permit coverage for industrial stormwater discharges could not be obtained after the 2000 MSGP had expired--between October 30, 2005 and September 29, 2008.

In addition to preparing and updating the SWPPP, including the site map, routine facility inspections were conducted on April 16, July 11 and October 23, 2008 before the deadline to obtain permit coverage under the 2008 MSGP. On August 20, 2009, the facility's SWPPP was updated and amended to add Superior Stormwater Services LLC, Los Lunas, New Mexico as a member of the facility's pollution prevention team to prepare SWPPP, perform quarterly and annual inspections, train employees, and assist in updating records.

NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>			<u>General</u>	
Inspection Type	Compliance Evaluation		Inspector Name	Erin S. Trujillo
NPDES ID Number	NMU001714		Telephone	505-827-0418
Inspection Date	02/15/2010		Entry Time	1250 hours
Inspector Type <i>(circle one)</i>	EPA	<input type="checkbox"/> State	Exit Time	1545 hours
Facility Sector/ SIC/Activity Code	Sector E SIC 3273 Sector D SIC 2951		Signature	/s/Erin S. Trujillo

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	Sangre De Cristo Gravel Products, LLC / 1109 Airport Road / 49 NM 250 Box 5 / Las Vegas, New Mexico 87701			
GPS Coordinates	Latitude	35.628164°	Longitude	-105.198337°
Receiving Water(s)	Off-site unnamed tributaries and constructed pond, thence to unnamed lake/reservoir, thence to the classified Pecos Arroyo (Segment 20.6.4.221 NMAC), thence to the Gallinas River in the Pecos River Basin.			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Sangre De Cristo Gravel Products, LLC	505-425-8833
Facility Contact	Lorenzo Melendez, Manager, Sangre De Cristo Gravel Products, LLC	505-425-8833
Authorized Official(s)	Francisco (Miguel) Melendez	505-850-6839

<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	<input checked="" type="checkbox"/> General	<input type="checkbox"/> Individual	SWPPP Contents Satisfactory	Y	<input type="checkbox"/> N
Operational Date	Approx 03/02/2007		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	None		SWPPP Date	11/20/2007	
If applicable, is no exposure certification on file?	Y	N	<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General	Notes:		
Was the SWPPP completed prior to NOI submission?	Y	N	Not applicable (no documentation of submission of NOI for 2008 MSGP on day of this inspection).
Copy of the NOI and acknowledgment letter from EPA?	Y	<input checked="" type="checkbox"/> N	
Copy of the permit language?	<input checked="" type="checkbox"/> Y	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	<input checked="" type="checkbox"/> N	No copies of application, acknowledgement letter/email or other documentation of operator submitting NOI or following up with NOI processing center to obtain permit coverage under the 2008 MSGP was contained in SWPPP. Inspection report refers to previous inspection on February 19, 2010, but the 1 st Qtr 2010 report was not found contained in SWPPP.
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	Y	N	Not applicable.
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input checked="" type="checkbox"/> N	Not updated (certification dated 11/20/2007). No documentation that "action area" considered (see Definitions Appendix A and Step Two: Determine if Listed Threatened or Endangered Species and Critical Habitat are Present in the Action Area, Appendix E of 2008 MSGP).
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	Not applicable.
Did all "operators" sign/certify the SWPPP?	Y	<input checked="" type="checkbox"/> N	Signature and certification language not updated (see Part B.11.E of the 2008 MSGP).
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/>	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/>	N	
Is there a site specific site map?	<input checked="" type="checkbox"/>	N	Site map had numerous updates and strike outs. A new map(s) should be considered.
Does the site map contain the size of the property in acres?	Y	<input type="checkbox"/>	
Does the site map contain the location and extent of significant structures and impervious surfaces?	Y	<input type="checkbox"/>	Y = structures; N = extent impervious surfaces
Does the site map contain directions of storm water flow (indicated by arrows)?	Y	<input type="checkbox"/>	No direction/arrows in southwest portion of site.
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/>	N	But, map is not to scale and shows berm in south-southwest corner of site which was missing at water access pump (see photo log).
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 type="checkbox"/>	Off-site adjacent unnamed tributaries that flow to pond not shown.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input type="checkbox"/>	Did not show swale through the center of site to a low area/pond behind the Main Office (see photo log).
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input checked="" type="checkbox"/>	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	N	No spills and leaks occurred according to SWPPP. See notes and photo log below.
Does the site map contain locations of all storm water monitoring points?	Y	<input type="checkbox"/>	Only one outfall was shown in central-west property boundary. Additional monitoring points or outfalls (locations where the stormwater exits the facility) existed in the southwest portion of the site at breaks or gaps in earth berm with flow toward off-site pond.
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 type="checkbox"/>	Outfall shown on map in central-west portion of the site would not be representative of all industrial stormwater discharges. Also, site map did not show approximate outline of the areas draining to each outfall.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	Not applicable.
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	No non-stormwater discharge identified. Potential for non-stormwater discharges to commingle with stormwater in south-southwest corner of the site. See SWPPP implementation notes below.

NPDES Industrial Storm Water Checklist (MSGP)

<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading/unloading areas • Locations used for the treatment, storage or disposal of wastes • Liquid storage tanks • Processing and storage areas • 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 • Transfer areas for substances in bulk • Machinery 	<input checked="" type="checkbox"/>	N	
<p>Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?</p>	Y	N	Not applicable.
<p>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?</p>	<input checked="" type="checkbox"/>	N	But, potential for non-stormwater discharges to commingle with stormwater in the south-southwest corner of the site. See SWPPP implementation notes below.
<p>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)?</p>	<input checked="" type="checkbox"/>	N	
<p>Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?</p>	<input checked="" type="checkbox"/>	N	
<p>Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?</p>	Y	N	No spills and leaks occurred according to SWPPP. See notes and photo log below. Documentation needs to be updated.

NPDES Industrial Storm Water Checklist (MSGP)

Site Description		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> • Date • Description of evaluation criteria • List of the outfalls or onsite drainage points directly observed • Different types of non-storm water discharges and source locations • Actions taken such as a list of control measures for elimination. 	Y	<input checked="" type="checkbox"/> N	Not updated after 09/14/2007 (see notes above on additional monitoring points and potential non-stormwater discharges and notes below on SWPPP implementation). No certification per sector-specific requirements for facilities producing ready-mix concrete, concrete block, brick, or similar products (see Part 8.E.3.2 of 2008 MSGP).
Does salt storage occur at this facility?	Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	No sampling data according to SWPPP.
Controls to Reduce Pollutants		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"/> Y	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/> Y	N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/> Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants		Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	<input checked="" type="checkbox"/> N
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	N
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	<input checked="" type="checkbox"/> N
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/> 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?	Y	<input checked="" type="checkbox"/> N
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	N
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	Y	<input checked="" type="checkbox"/> N
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	Y	<input checked="" type="checkbox"/> N
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	<input checked="" type="checkbox"/> N

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants		Notes:
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/> Y	N But, updated/clarification needed. Section 5c of SWPPP states, <i>"Berms-earth and rock...not needed at this facility"</i>
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"/> Y	N But, not fully implemented (see notes below).
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"/> N N = discharge locations; Not applicable = outfall channels
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 Not applicable.
Employee Training – is there a schedule for regular (at least annually) employee training?	Y	<input checked="" type="checkbox"/> N Implementation not documented (see previous notes).
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"/> N Implementation not documented (see previous notes).
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"/> Y	N
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	N
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	<input checked="" type="checkbox"/> N Not documented (see previous notes on monitoring locations in southwest portion of the site and notes below on SWPPP implementation).

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

The need for clarification and/or updates to SWPPP for the following were also noted:

-Not all references to the 2000 MSGP or previous consultant (Paradigm Engineering, P.L.L.C.) had been corrected or updated.

-Activity specific BMP (Section B Item 3 Oil and Fluid Storage of SWPPP) was not updated with concrete secondary containment at fuel storage tanks.

-Activity specific BMP (Section B Item 5 Outfall of SWPPP) was not updated with outfall/monitoring points in southwest corner of property.

Narrative discussion in Operator's Inspection Report dated 12/01/2010 and Annual Report discusses numerous actions and recommendations needed at site. A corrective action log with schedules and dates of completion may be useful for the facility.

Operator's Annual Report 2010 states, "*areas near the southwest corner are being paved to further minimize and (sic) potential runoff into the creek and pond.*" This statement was not complete and it is not clearly stated how paving would minimize runoff. Consideration of additional measures (e.g., curbing, dissipation) and/or clarification in SWPPP is needed.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	<input checked="" type="checkbox"/> N	Since 01/05/2009, inspections were not documented for 1 st Qtr 2009.
Are inspections documented, including: <ul style="list-style-type: none"> • Date and time • Name and signature of inspector • Weather information and a description of discharge occurring at the time of the inspection • Previously unidentified discharges from site • Control measures needing maintenance or repairs • Failed control measures that need replacement • Incidents of noncompliance observed • Additional control measures needed. 	Y	<input checked="" type="checkbox"/> N	Time not documented.
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	N	No exceptions documented.
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	Y	<input checked="" type="checkbox"/> N	Since 01/05/2009, visual assessments were not documented for 1 st , 2 nd , 3 rd or 4 th Qtr 2009; and 1 st and 2 nd Qtr 2010. Additional monitoring points/outfalls will need to be included in assessment.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container. 	Y	N	No samples collected.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections - Continued			
Are assessments documented, including: <ul style="list-style-type: none"> • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes. 	Y	N	No samples collected.
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites. 	Y	N	No exceptions documented.
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input checked="" type="checkbox"/> N	Since 01/05/2009, comprehensive site inspections were not documented for Year 1 (09/29/08 thru 09/29/09). <u>Comments:</u> Comprehensive site inspections were conducted and documented on 01/18/2010 (Year 2) and 12/01/2010 (Year 3).
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input checked="" type="checkbox"/>	N	
Cover all areas of the facility?	<input checked="" type="checkbox"/>	N	
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 samples collected.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections		
<p>Include observations of the following:</p> <ul style="list-style-type: none"> • Industrial materials, residue, or trash that may have or could come into contact with storm water • Leaks or spills from industrial equipment, drums, tanks, and other containers • Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site • Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas • Control measures needing replacement, maintenance, or repair • All storm water control measures observed. 	<input checked="" type="checkbox"/>	N
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> • Date of inspection • Names and titles of personnel making the inspection • Findings from examination of areas of facility from Part 4.3.1 • All observations relating to implementation of control measures • Any required revisions to the SWPPP resulting from inspection • Any incidents of noncompliance identified OR certification that facility is in compliance with the permit • A statement signed in accordance with Appendix B, Subsection 11 	Y	<p>Reports were not signed by a person described in Appendix B, Subsection 11.A or by a duly authorized representative of that person. Reports were signed/certified by Katheleen Leiting, Superior Stormwater Services LLC. A signed and dated written authorization for Superior Stormwater Services LLC was not contained in the SWPPP.</p>

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	<u>Notes:</u>		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input checked="" type="checkbox"/> Y	N	Additional monitoring points/outfalls need to be included in monitoring procedures. Additional procedures would be needed to ensure that samples collected are within the first 30 minutes of a measurable storm event or snow melt. Quality control/quality assurance and contracts with analytical laboratory would also be needed.
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	<input checked="" type="checkbox"/> Y	N	See above. <u>Comments:</u> SWPPP discusses analytical monitoring requirements and effluent limitations for cement manufacturing. However, as previously discussed cement manufacturing activities were not at the site on the day of this inspection.
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	Not applicable.
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	No samples collected.
Benchmark Monitoring			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling. 	Y	N	No samples collected.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	No samples collected.
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	No samples collected.

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> Make the necessary modifications Continue quarterly monitoring Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA Natural background pollutant level documentation 	Y	N	No samples collected.
Exceptions, including (see 6.1 & 6.2): <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Snowmelt Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	Y	N	No exceptions documented.
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	No samples collected.
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	No samples collected
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	Y	N	Not applicable.
Reporting (Part 7)			
<u>General</u>			Notes:
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	Y	N	No analytical data.
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/>	SWPPP had no documentation that annual reports were submitted to USEPA. As previously discussed, annual reports were not signed by a person described in Appendix B, Subsection 11.A or by a duly authorized representative of that person.
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	No monitoring results.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<p>Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff</p>	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>Spills and leaks at the vehicle maintenance building had not been cleaned up (see photo log).</p>
<p>Good Housekeeping</p>	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>A wall at a small storage tank was stained and exposed to precipitation (see photo log).</p> <p>Waste oil was stored in open buckets and containers exposed to precipitation (see photo log).</p>
<p>Preventative maintenance</p>	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>Preventative maintenance of basins was not documented in accordance with the Operator's SWPPP. SWPPP stated, <i>"The amount of sediment removed...must be included in quarterly records..."</i> and <i>"Records of inspections and preventative maintenance will be kept with the records of other visual inspections."</i></p> <p>Storage of waste oil uncovered and exposed to precipitation outside the vehicle maintenance building was not discussed in the SWPPP; therefore, additional preventative maintenance, back-up practices and/or housekeeping measures appear needed.</p> <p>Need for preventative maintenance of earth berms and low area/pond behind Main Office is discussed below.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Larger on-site fuel storage had secondary containment, but a smaller tank did not (see photo log). As previously discussed, spills and leaks at the vehicle maintenance building had not been cleaned up.</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Vegetative filter strips existed along most of the property boundaries. However, earth berms had breaks or gaps along the western property boundary along an unnamed tributary and at the south-southwest portion and corner of the property adjacent to the pond. Earth berm construction techniques (e.g., specifications, dimensions, stabilization) should also be reviewed. Along the south-southwest portion of the site, erosion channels had formed (see photo log).</p>
Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>The low area/pond behind the Main Office was at capacity. Additional measures (e.g., additional ponds, cleaning out sediment, increasing capacity, etc.) appeared needed to manage runoff.</p>
Salt Storage Piles	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>No salt storage.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>There was little windblown trash observed. But, site had old parts and equipment, scrap metal, drums, lumber, tires, etc (see examples in photo log). Drum storage areas should be labeled and/or cleaned up to prevent accumulation of wastes. Any liquid waste should be properly disposed.</p>
Evidence of non-storm water discharges	<p>No evidence of non-stormwater discharges on the day of this inspection.</p> <p>Allowable non-stormwater discharges for dust control and air conditioning condensate was described in the SWPPP. In addition, a water faucet and hose was located at the concrete production area. Flow from this location would be toward the central swale then low area/pond behind the Main Office to the south-southwest corner of the site (additional outfall(s) discussed above). Any discharge of process waste waters from washing trucks, mixers, transport buckets, forms, or other equipment would not be allowable under the MSGP. Use of water from this faucet and hose and measures to ensure that process waters are not discharged need to be considered and documented in the Sector E-specific non-stormwater certification previously discussed.</p>
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Site soils were saturated from snow melt on day of this inspection. No dust generation problems observed on day of inspection. No off-site vehicle tracking problems observed.</p>

Notes on SWPPP Implementation and Sector Specific Requirements
<p>List and describe structural controls <i>(The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications)</i></p> <p>See sector-specific above notes.</p>

NMED/SWQB General Area Map		
Created by: Erin Trujillo		
City/County: Las Vegas / San Miguel	State: New Mexico	
Location: Sangre de Cristo Gravel Products, LLC		
Subject: Arrows point to off-site unnamed tributaries surrounding the facility that lead to pond. Pond is shown on SWPPP site map to be outside the facility's property boundaries. Overflow from the off-site pond is to an unnamed lake/reservoir that flows to a tributary to Harris Lake and Pecos Arroyo.		



NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Erin Trujillo	Date: 02/15/2011	Time: 1446 hours
City/County: Las Vegas / San Miguel		State: New Mexico
Location: Sangre de Cristo Gravel Products, LLC		
Subject: Arrow points to erosion channel in the south-southwest portion of the site.		



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Erin Trujillo	Date: 02/15/2011	Time: 1448 hours
City/County: Las Vegas / San Miguel		State: New Mexico
Location: Sangre de Cristo Gravel Products, LLC		
Subject: Paved area without curb at water pump in south-southwest corner of site and off-site pond. Photo brightness increased for report.		



NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Erin Trujillo	Date: 02/15/2011	Time: 1455 hours
City/County: Las Vegas / San Miguel		State: New Mexico
Location: Sangre de Cristo Gravel Products, LLC		
Subject: Erosion channel that has cut through earth berm in south-southwest portion of property.		



NMED/SWQB Official Photograph Log Photo # 4		
Photographer: Erin Trujillo	Date: 02/15/2011	Time: 1502 hours
City/County: Las Vegas / San Miguel		State: New Mexico
Location: Sangre de Cristo Gravel Products, LLC		
Subject: Portion of west property boundary that does not have earth berm.		



NMED/SWQB Official Photograph Log Photo # 5		
Photographer: Erin Trujillo	Date: 02/15/2011	Time: 1504 hours
City/County: Las Vegas / San Miguel		State: New Mexico
Location: Sangre de Cristo Gravel Products, LLC		
Subject: Example of un-labled drum and other material storage along west property boundary.		



NMED/SWQB Official Photograph Log Photo # 6		
Photographer: Erin Trujillo	Date: 02/15/2011	Time: 1506 hours
City/County: Las Vegas / San Miguel		State: New Mexico
Location: Sangre de Cristo Gravel Products, LLC		
Subject: Spill on ground at vehicle maintenance shop. Open buckets and containers with what appeared to be waste-oil were also exposed to precipitation.		



NMED/SWQB Official Photograph Log Photo # 7		
Photographer: Erin Trujillo	Date: 02/15/2011	Time: 1513 hours
City/County: Las Vegas / San Miguel		State: New Mexico
Location: Sangre de Cristo Gravel Products, LLC		
Subject: Unlabeled liquid storage tank with staining on building and no secondary containment.		



NMED/SWQB Official Photograph Log Photo # 8		
Photographer: Erin Trujillo	Date: 02/15/2011	Time: 1525 hours
City/County: Las Vegas / San Miguel		State: New Mexico
Location: Sangre de Cristo Gravel Products, LLC		
Subject: Snowmelt flowing through central portion of site in swale (swale not shown on site map).		

