



NEW MEXICO
 ENVIRONMENT DEPARTMENT
Surface Water Quality Bureau



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JAMES H. DAVIS, Ph.D.
 Director
 Resource Protection Division

June 4, 2012

Juan A. Fuentes, City Manager
 City of Truth or Consequences
 505 Sims Street
 Truth or Consequences, New Mexico 87901

RE: Industrial Storm Water, SIC 4581, NPDES Compliance Evaluation Inspection, City of Truth or Consequences / T or C Municipal Airport, NMU001792, April 25, 2012

Dear Mr. Fuentes:

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 checklist 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:

Diana McDonald, USEPA (6EN-WM)
 U.S. Environmental Protection Agency
 Allied Bank Tower
 Region VI Enforcement Branch (6EN-WM)
 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

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

I appreciate both Vaughn Huron, Attendant and Ed Williams, Acting Airport Manager 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 Tate, EPA (6EN-AS) by e-mail
 Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
 Diana McDonald, USEPA (6EN-WM) by e-mail
 Darlene Whitten-Hill, USEPA (6EN-AS) by e-mail
 Mike Kesler, NMED District III Acting Manager by e-mail
 Ed Williams, Acting Airport Manager, T or C Municipal Airport 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 9 2 11 12 1 2 0 4 2 5 17 18 ~ 19 S 20 2					
Remarks					
A I R P O R 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) Truth or Consequences Municipal Airport, approximately 6 miles north of Truth or Consequences on NM 181. Sierra County	Entry Time /Date 1300 hours / 04/25/2012	Permit Effective Date September 29, 2008
	Exit Time/Date 1545 hours / 04/25/2012	Permit Expiration Date September 29, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) -Vaughn Huron / Airport Attendant, T or C Municipal Airport / 575-894-6199 -Ed Williams / Acting Airport Manager/Safety Coordinator, T or C Municipal Airport / 575-740-2612	Other Facility Data Facility Entrance Latitude 33.238561° Longitude -107.265457° SIC 4581	
Name, Address of Responsible Official/Title/Phone and Fax Number Juan A. Fuentes, 505 Sims Street, City of Truth or Consequences, New Mexico 87901 / City Manager / 575-894-6673 and Fax 575-894-7767	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)

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
N	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

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

- City of Truth or Consequences (airport authority), an operator of a transportation airport facility conducting fueling and aircraft deicing activities, submitted/certified a Notice of Intent (NOI) on January 23, 2003 for the Truth or Consequences Municipal Airport to obtain permit coverage under the NPDES industrial stormwater 2000 MSGP (expired NPDES Tracking No. NMR05B216). The deadline for submitting an NOI under the 2000 MSGP was December 29, 2000. The NOI submitted under the 2000 MSGP may not have been signed by a principal executive officer or ranking elected official.
- City of Truth or Consequences did not obtain coverage under the 2008 MSGP by the deadline of January 5, 2009 or the date of this inspection.
- An on-site SWPPP was prepared in May of 2002, but was not completed (signed/certified). The SWPPP was not updated to meet the requirements of the 2008 MSGP. There was no documentation in the SWPPP or provided on the day of this inspection that required inspections, training, monitoring and evaluations were implemented.
- See attached checklist and photo log.
- A separate EPA Form 3560 will be submitted for Tri-State Care Flight, LLC, an air ambulance tenant at the facility.

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 06/04/2012
Signature of Management QA Reviewer Richard E. Powell /s/Richard E. Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798	Date 06/04/2012

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information			General		
Inspection Type	Compliance Evaluation		Inspector Name	Erin S. Trujillo	
NPDES ID Number	NMU001792		Telephone	505-827-0418	
Inspection Date	04/25/2012		Entry Time	1300 hours	
Inspector Type <i>(circle one)</i>	EPA	<input type="checkbox"/> State	EPA Oversight	Exit Time	1545 hours
Facility Sector/ SIC/Activity Code	Sector S / SIC 4581		Signature	/s/Erin S. Trujillo	

Facility Location Information				
Name/Location/ Mailing Address	City of Truth or Consequences, Municipal Airport , NM 181, Sierra County / Mailing Address at 505 Sims Street, Truth or Consequences New Mexico 87901			
GPS Coordinates	Latitude	33.238561°	Longitude	-107.265457°
Receiving Water(s)	Unnamed tributaries, thence approximately 3.5 miles to Elephant Butte Reservoir (20.6.4.104 NMAC) and unnamed tributaries to Yapple Canyon, thence approximately 6 miles to Cuchillo Negro Creek, thence approximately 1.5 miles to Rio Grande (Caballo Reservoir to Elephant Butte Reservoir) 20.6.5.103 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	City of Truth of Consequences – Airport Authority Tri-State Care Flight, LLC - Tenant	575-894-6673 928-754-4779
Facility Contact	Ed Williams/Acting Airport Manager & Safety Coordinator, City of T or C	575-894-6199 575-740-2612
Authorized Official(s)	Juan A. Fuentes/City Manager, City of T or C	575-894-6673

Basic Permit Information			Basic SWPPP Information		
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	Not Documented		SWPPP Implementation Satisfactory	Y	<input type="checkbox"/> N
NOI/Application Date	Expired	01/23/2003	SWPPP Date	May 2002	
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	<input type="checkbox"/> N	NOI for 2008 MSGP was not submitted. SWPPP dated May 2002 prepared by ASCG Incorporated, Albuquerque, New Mexico was not completed (signed/certified). SWPPP does not contain, nor was other information provided, that an NOI was submitted to obtain coverage under the 2008 MSGP.
Copy of the NOI and acknowledgment letter from EPA?	Y	<input type="checkbox"/> N	
Copy of the permit language?	Y	<input type="checkbox"/> N	Plan did not contain copy of 2000 or 2008 MSGP. SWPPP referred to 1998 Federal Register Review Draft.
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 type="checkbox"/> N	Not documented. Plan refers to inspections, but no completed inspections or reports contained in SWPPP or 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"> • 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 type="checkbox"/> N	Plan refers to MSDS (available on-site, but not included in plan) and FAA spill procedures, but relevant parts not included.
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	Y	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	Y	<input type="checkbox"/> 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 type="checkbox"/> N	
Is the storm water pollution prevention team identified (name or title)?	Y	<input type="checkbox"/> N	Not updated. Team only included former airport manager who according to the airport attendant no longer worked at the airport after February 2012 .
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	<input type="checkbox"/> N	But, not updated for aircraft de-icing.
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?	Y	<input type="checkbox"/> N	
Is there a site specific site map?	Y	<input type="checkbox"/> N	SWPPP refers to map, but no site map containing all required MSGP information below was in plan or located for review during this inspection.
Does the site map contain the size of the property in acres?	Y	<input type="checkbox"/> N	See above/No site map
Does the site map contain the location and extent of significant structures and impervious surfaces?	Y	<input type="checkbox"/> N	See above/No site map
Does the site map contain directions of storm water flow (indicated by arrows)?	Y	<input type="checkbox"/> N	See above/No site map
Does the site map contain locations of all existing structural control measures?	Y	<input type="checkbox"/> N	See above/No site map
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"/> N	See above/No site map
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	<input type="checkbox"/> N	See above/No site map
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	Y	<input type="checkbox"/> N	See above/No site map
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	<input type="checkbox"/> N	No significant spills or leaks identified
Does the site map contain locations of all storm water monitoring points?	Y	<input type="checkbox"/> N	See above/No site map
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"/> N	See above/No site map
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	<input type="checkbox"/> N	See above/No site map
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	<input type="checkbox"/> N	No non-stormwater discharges identified or observed.

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 	Y	<input type="checkbox"/> N	See above/No site map
<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	<input type="checkbox"/> N	Not documented/No site map
<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>	Y	<input type="checkbox"/> N	Not updated with current fuel storage tank information.
<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"/> Y	N	
<p>Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?</p>	Y	<input type="checkbox"/> N	Only general information on fuels and herbicide pollutants included in SWPPP. SWPPP did not include record of monthly quantities of deicing materials used, in this case, one event (see Part 8.S.4.2 of 2008 MSGP).
<p>Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?</p>	Y	<input type="checkbox"/> N	No spills per SWPPP. But, plan documentation was not updated.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> • Date 05/10/2002 • Description of evaluation criteria Y • List of the outfalls or onsite drainage points directly observed N • Different types of non-storm water discharges and source locations NA • Actions taken such as a list of control measures for elimination NA 	Y	<input type="checkbox"/> N	No non-stormwater discharges per SWPPP. But, plan documentation was not updated.
Does salt storage occur at this facility?	Y	<input type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	N	Not applicable/No sampling data
<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?	Y	<input type="checkbox"/> N	SWPPP (Section III.B) refers to existing and proposed storm water drainage facilities, swales, ponds, and pipe culvert to collect and direct storm water; and detention ponds. But, site map or other documentation on location is not provided in SWPPP.
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 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 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 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	N	N = Schedule for pick up Y = Routine inspections
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	Y	N	Y = preventative maintenance procedures, including regular inspections N = back-up practices should a runoff event occur while a control measure is off-line
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?	Y	<input type="checkbox"/> N	Only general information (e.g., does not include relevant FAA procedures for fueling and spill prevention).
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 type="checkbox"/> Y	N	But, barriers and secondary containment not described in plan.
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	Y	<input type="checkbox"/> N	Procedures described in SWPPP may not be sufficient. See implementation notes below on observed vehicle leaks and staining.
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 type="checkbox"/> N	Not documented/No training documented in SWPPP.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	<input type="checkbox"/> N	No notifications. But, some spill reporting telephone numbers in SWPPP need to be updated.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants		Notes:	
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/>	N	But, only generally described in SWPPP.
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	But, only generally described in SWPPP.
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"/>	Flow dissipation devices not described in SWPPP.
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	No salt storage
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	<input checked="" type="checkbox"/>	Not documented/No training documented in 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?	Y	<input checked="" type="checkbox"/>	Yes, but only generally described in sediment and erosion control section of SWPPP. Also, procedures described in SWPPP may not be sufficient. See implementation notes below on observed tracking on paved surfaces near fuel storage area.
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	N	Not applicable/no non-storm water discharges observed.

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Review

Introduction:

Upon arrival on the day of this inspection, the inspector made introductions, presented credentials and explained the purpose of the inspection to Mr. Huron and upon his arrival Mr. Williams. The inspector toured the facility and conducted an exit interview to discuss preliminary findings with Mr. Williams. Additional information on the 2008 MSGP and sector requirements was provided by-email to both a representative of an on-site tenant (Mr. Sid Essex, Director of Maintenance, Tri-State Care Flight, LLC) and Mr. Williams on May 1, 2012. This report is based on review of EPA's on-line notice of intent (eNOI) database, files maintained by the City of Truth or Consequences (airport authority/operator) and NMED, and on-site observation by NMED personnel, and verbal information provided by the airport authority (operator) on-site representatives. Information on runway and operational date of the municipal airport was obtained from AirNav.com.

Site Description and Industrial Activity Summary:

An airport has been located at this site since 1946. City of Truth or Consequences (airport authority) owns and operates the Truth or Consequences municipal airport with one asphalt paved and four gravel runways on approximately 751 acres with approximately 10 acres regularly used. The facility also has paved taxiways, aprons for aircraft parking, terminal and restroom buildings, aircraft storage hangers and fuel facilities. The facility operates two fuel trucks and has three active fuel storage tanks. Two of the active fuel storage tanks were in an unlined open excavated pit. A 10,000-gallon fuel storage tank with secondary concrete containment, which was previously operated by the U.S. Air Force Kirtland Air Force Base, also existed at the facility. City of Truth or Consequences employees (attendants) conduct aircraft fueling on aircraft aprons, except for one air ambulance tenant that maintains and conducts their own fueling. Light aircraft maintenance and oil change activities are done in hangers according to the operator on-site representatives and information in the SWPPP. Snow and ice removal from runways was required in December of 2011 (no chemicals were used) and chemical aircraft de-icing was conducted by City of Truth or Consequences employees for one tenant's aircraft. A 55-gallon drum containing anti-icing fluid was stored in a maintenance area in one of the covered (enclosed) hanger bays on site. Based on a review of on-site Material Safety Data Sheets, materials used and stored on site include aviation gasoline 100 LL, Jet A fuel, various equipment oil weights (AeroShell Oil W80, W 15W-50), deicing/anti-icing fluid (propylene glycol 88-90%), and herbicide concentrate containing lithium salt of bromacil, ethylene glycol, ethanol and methanol. Military aircraft may still use the airport, but there did not appear to be any current air force maintenance or fueling activities on site. The acting airport manager did not know if the City owned the 10,000 gallon tank. Current ownership of the 10,000-gallon tank, and drums and containers observed stored in the concrete secondary containment area of the tank, was not determined during this inspection.

SWPPP Description of Drainage:

SWPPP (Sections III.B and III.H) incorrectly refers to drainage to the Pecos River. SWPPP did not include a Drainage Area Site Map (see Part 8.S.4.1 of the 2008 MSGP).

SWPPP Description, Coordination and Integration of Tenant Industrial Activities:

Tenant industrial activities described in the SWPPP were not updated for an air ambulance tenant (operator) conducting maintenance and fueling on site. Tri-State Care Flight, LLC has been a tenant at the airport since approximately January of 2012 according to the airport attendant. SWPPP (Section III.C) states, "...tenant and other registered owners have been notified of SWPPP development activities and invited to participate." There was no documentation that tenants had been notified as described in the SWPPP. Part 8.S.4 (Additional SWPPP Requirements) of the 2008 MSGP states, "An airport authority and tenants of the airport are encouraged to work in partnership in the development of a SWPPP. If an airport tenant obtains authorization under this permit and develops a SWPPP for discharges from his own areas of the airport, prior to authorization, that SWPPP must be coordinated and integrated with the SWPPP for the entire airport."

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)		
<u>General</u>	Notes:	
Routine Facility Inspections		
Are routine facility inspections conducted at least quarterly while facility operating?	Y	<input type="checkbox"/> N
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 type="checkbox"/> N
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> • Inactive and unstaffed sites 	Y	N
Quarterly Visual Assessment		
Are quarterly visual assessments conducted?	Y	<input type="checkbox"/> N
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	<input type="checkbox"/> N

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
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	<input type="checkbox"/> N	See above
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	<input type="checkbox"/> N	See above. No exceptions documented in SWPPP.
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	Y	<input type="checkbox"/> N	Not documented/No completed comprehensive site inspection reports starting 09/29/2008 in SWPPP or provided.
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	Y	<input type="checkbox"/> N	See above
Cover all areas of the facility?	Y	<input type="checkbox"/> N	See above
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	<input type="checkbox"/> N	See above

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. 	Y	<input type="checkbox"/> N	See above
<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	<input type="checkbox"/> N	See above

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	No benchmark monitoring required (no use of more than 100,000 gallons of glycol-based deicing chemicals and/or 100 tons or more of urea) based on information from operator on-site representatives.
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	No effluent limitation guidelines for Sector S
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 benchmark or effluent monitoring required
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	Not applicable
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	See above
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	See above

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	See above
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	See above
Effluent Limitations Monitoring			
Sampled once per year?	Y	N	Not applicable
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	Y	N	See above
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	Y	N	See above
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	Not applicable
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	Y	<input checked="" type="checkbox"/> N	Not documented/No annual report or submittal documentation in SWPPP.
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	Y	N	Not applicable

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> <ol style="list-style-type: none"> 1. Observed culvert near taxiway would direct runoff to swale 2. Unlined open excavation (containment) for two active fuel storage tanks may minimize the discharge of pollutants should a spill occur 3. Concrete secondary containment at the 10,000-gallon tank and small containment devices were installed at the fill pipes for active tanks 4. Some materials and a maintenance shop are inside buildings and hangers protected from precipitation and runoff. For example, Brom 7.5 herbicide concentrate container was stored inside the terminal building. 5. Absorbent spill material kept in one fueling vehicle
<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>No substantial windblown trash or litter was observed. A covered dumpster was observed near facility entrance. Generally, exposed areas were clean. However:</p> <ol style="list-style-type: none"> 1. small trash can near terminal building was uncovered; 2. 55-gallon drum near fuel storage area was not labeled; and 3. surface staining observed 1) below maintenance vehicle, 2) at unlabeled drum, 3) near air ambulance tenant fuel storage, and 4) outside secondary containment for 10,000 gallon unused fuel tank near drum and container storage. 4. Some drum and containers were not sheltered from exposure from stormwater run on and runoff.
<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>No preventative maintenance schedules documented in SWPPP. Staining was observed below one of the maintenance vehicle near fuel storage area which may indicate repair and/or other measure (e.g., drip pans) are needed.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Spill absorbent material was in one maintenance vehicle. SWPPP did not describe the amount and types of spill material needed for fueling operations.</p> <p>No measures (e.g., drip pan) observed to contain maintenance vehicle leaks. Staining near material and container storage was not cleaned up and properly disposed.</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>Gravel and pavement used for stabilization. No flow velocity dissipation measures observed. Between hanger buildings, some erosion was observed at edge of pavement at swales that would direct flow toward culvert at site boundary fence.</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>Near taxiway, south of terminal building, observed swale would reduce storm water runoff and allow infiltration at one location of facility.</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 piles observed.</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>No windblown litter observed at airport terminal, fuel storage and hanger areas. Covered dumpster was located near exit. But, small trash cans were uncovered.</p>
Evidence of non-storm water discharges	<p>No non-stormwater discharges observed during this inspection.</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>No dust observed during this inspection.</p> <p>Some tracking from unpaved to paved surfaces observed. Some ruts were observed in gravel area near fuel storage tanks. Consideration of additional measures to minimize tracking in this area (e.g., sweeping, pavement, additional gravel, other measure to prevent vehicles from crossing gravel area and tracking onto paved surface) appeared needed.</p>

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Implementation and Sector Specific Requirements

List and describe structural controls (*The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications*)

Consideration of additional technology-based effluent limits in Part 8.S.3.1 of the 2008 MSGP was not documented in the SWPPP [e.g., using drip pan for the collection of fluid leaks (Part 8.S.3.1.3); labels (Part 8.S.3.1.4); recovering deicing materials (8.S.3.1.7)].

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Erin S. Trujillo	Date: 04/25/2012	Time: 1442 hours
City/County: North of Truth or Consequences / Sierra County		State: New Mexico
Location: Truth or Consequences Municipal Airport		
Subject: Mobile fuel tank stored outside City of Truth or Consequences hanger leased by air ambulance tenant. Staining was observed on pavement.		

Staining



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Erin S. Trujillo	Date: 04/25/2012	Time: 1457 hours
City/County: North of Truth or Consequences / Sierra County		State: New Mexico
Location: Truth or Consequences Municipal Airport		
Subject: Staining (spills) at un-labeled drum. On-site representative stated that the drum may contain used oil.		

Staining



NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Erin S. Trujillo	Date: 04/25/2012	Time: 1502 hours
City/County: North of Truth or Consequences / Sierra County	State: New Mexico	
Location: Truth or Consequences Municipal Airport		
Subject: Staining below City of Truth or Consequences Municipal Airport vehicle parked near fuel storage area.		

Staining



NMED/SWQB Official Photograph Log Photo # 4		
Photographer: Erin S. Trujillo	Date: 04/25/2012	Time: 1502 hours
City/County: North of Truth or Consequences / Sierra County	State: New Mexico	
Location: Truth or Consequences Municipal Airport		
Subject: Material storage containers not fully sheltered from exposure from stormwater run on and runoff.		



NMED/SWQB Official Photograph Log Photo # 5		
Photographer: Erin S. Trujillo	Date: 04/25/2012	Time: 1503 hours
City/County: North of Truth or Consequences / Sierra County		State: New Mexico
Location: Truth or Consequences Municipal Airport		
Subject: Uncovered trash can near terminal building.		



NMED/SWQB Official Photograph Log Photo # 6		
Photographer: Erin S. Trujillo	Date: 04/25/2012	Time: 1530 hours
City/County: North of Truth or Consequences / Sierra County		State: New Mexico
Location: Truth or Consequences Municipal Airport		
Subject: Amount of absorbent material kept in fueling vehicle. No other spill materials or kit was observed for City of Truth or Consequences operations during the tour.		



NMED/SWQB Official Photograph Log Photo # 7		
Photographer: Erin S. Trujillo	Date: 04/25/2012	Time: 1534 hours
City/County: North of Truth or Consequences / Sierra County		State: New Mexico
Location: Truth or Consequences Municipal Airport		
Subject: Drums and containers kept inside concrete secondary containment at 10,000-gallon storage tank.		



NMED/SWQB Official Photograph Log Photo # 8		
Photographer: Erin S. Trujillo	Date: 04/25/2012	Time: 1535 hours
City/County: North of Truth or Consequences / Sierra County		State: New Mexico
Location: Truth or Consequences Municipal Airport		
Subject: Staining outside secondary containment.		

Staining

