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BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

Certified Mail – Return Receipt Requested

August 9, 2018

Mr. Jeffrey Smaka/Wastewater Administrator
City of Farmington
800 Municipal Road
Farmington, NM 87401

Re: City of Farmington / Farmington Wastewater Treatment Plant, MSGP; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES #NMR053104; July 10, 2018

Dear Mr.Smaka:

Enclosed please find a copy of the report and check list 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.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Robert Houston
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WS)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

July 10, 2018

Page 2 of 2

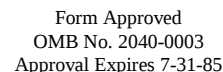
Robert Houston (Houston.Robert@epa.gov) is the USEPA Region 6's Stormwater Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Robert Houston, USEPA (6EN)
Darlene Whitten-Hill, USEPA (6EN) by e-mail
Robert Italiano, NMED District II by e-mail
Dean Roquemore, City of Farmington by e-mail



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	3	1	0	4	11	12	1	8	0	7	1	0	17	18	~	19	S	20																
Remarks																																											
S E C T O R T T R E A T M E N T W O R K S																																											
Inspection Work Days								Facility Evaluation Rating								BI		QA		-----Reserved-----																							
67								69				70				3				71		N		72		N		73				74		75								80	

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Farmington WWTP 1395 South Lake Street; Farmington, NM (go south on lake street, past the Hospital, make a jog to the east and past Murry Street turn south to gate of plant) San Juan County, New Mexico	Entry Time /Date 8:35AM/7-10-18	Permit Effective Date 6-4-2015
	Exit Time/Date 4:45PM/7-10-18	Permit Expiration Date 6-4-2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Dean Roquemore / Operations Manager /505-325-7027 Ms. Monica Peterson /Asst Project Manager/ 505-325-6953 Mr. Jacob Smith/Operations Supervisor		Other Facility Data SIC: 4952 Latitude: 36.71781 Longitude: 108.22074
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Jeffrey Smaka/Wastewater Administrator/505-599-1283 City of Farmington 800 Municipal Drive Farmington NM 87401	Contacted Yes ☒ No ☐	

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	N	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	S	Storm Water	N	Other:

1. Inspectors Jennifer Foote (NMED), David Esparza(EPA), and Magda Dallemagne (EPA) arrived on site and explained the purpose of the inspections and presented credentials to Mr.Dean Roquemore, Mr. Jacob Smith, and Ms.Monica Peterson. A CEI for the NPDES Individual Permit for the POTW was also conducted concurrently on this day by EPA staff. Mr. Roquemore provided the SWPPP for review and guided us on a tour of the facility. An exit interview(see Appendix A -sign in sheet) was conducted before the inspectors departed the facility.
2. See attached sheets for further details.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Jennifer Foote /s/ Jennifer Foote	NMED/SWQB 505-827-0596	8-9-18
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
Sarah Holcomb, Program Manager /s/ Sarah Holcomb	NMED/SWQB 505-827-2798	8-8-18

NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>		<u>General</u>	
Inspection Type	Compliance Evaluation	Inspector Name	Jennifer Foote
NPDES ID Number	NMR053104 NMU001973	Telephone	505-827-0596
Inspection Date	7/10/18	Entry Time	8:35am
Inspector Type (circle one)	☐ EPA ☒ State ☐ EPA Oversight	Exit Time	4:45pm
Facility Sector/ SIC/Activity Code	Sector T Treatment Works/ SIC 4952	Signature	/s/ Jennifer Foote

<u>Facility Location Information</u>				
Name/Location/ Mailing Address	Farmington WWTP 1395 South Lake Street Farmington, NM			
GPS Coordinates	Latitude	36.71781	Longitude	-108.22074
Receiving Water(s)	San Juan River (Navajo Bnd at Hogback to Animas River) in Water Quality Segment 20.6.4.401 NMAC			

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Jeffrey Smaka/Wastewater Administrator City of Farmington Jacqueline Hinman/President CH2M Hill	505-599-1283 720-286-2000
Facility Contact	Dean Roquemore / Operations Manager Jacob Smith/Operations Supervisor	505-325-7027
Authorized Official(s)	Jeffrey Smaka/Wastewater Administrator Jacqueline Hinman/President	505-599-1283 720-286-2000

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
Permit Coverage	☒ Y City of Farmington	☒ N CH2M Hill	SWPPP Prepared & Available	☒ Y ☐ N	
Permit Type	☒ General	☐ Individual	SWPPP Contents Satisfactory	☒ Y ☐ N	
Operational Date			SWPPP Implementation Satisfactory	☒ Y ☐ N	
NOI/Application Date	8/31/2015		SWPPP Date	August 2015 onsite	
If applicable, is no exposure certification on file?	☐ Y	☐ N ☒ N/A			

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General		Notes:	
Was the SWPPP completed prior to NOI submission?	☒ Y	☐ N	Onsite SWPPP was dated August 2015, and certified 9/1/15.
Copy of the NOI and acknowledgment letter from EPA?	☒ Y	☐ N	
Copy of the permit language?	☒ 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	☐ N	Previous SWPPP maintained on site. A digital copy of a SWPPP revised in 2017 was provided after the inspection. However this version of the plan was not onsite/available at the time of the inspection.
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: - Routine facility inspection (4.1.3) - Quarterly visual assessment (4.2.3) - Benchmark monitoring (6.2.1.3).	☐ Y	☐ N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	☐ Y	☐ N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	☒ Y	☐ N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	☒ Y	☐ N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	☐ Y	☐ N	N/A
Did all "operators" sign/certify the SWPPP?	☒ Y	☐ N	SWPPP Certified by both City of Farmington(owner) and CH2M (listed as operator in the SWPPP but has not applied for permit coverage). Section 2.2 Responsible Parties of the SWPP lists the City of Farmington as the owner and CH2M as the operator.
Is the storm water pollution prevention team identified (name or title)?	☒ Y	☐ N	Qualifications of SWPP Preparer are not included as per Part 5.1 of the Permit
Are the storm water pollution prevention team's responsibilities identified?	☒ Y	☐ N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
SWPPP provides a description of the facility's industrial activities?	☒ 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?	☒ Y	☐ N	
Is there a site specific site map?	☒ Y	☐ N	
Does the site map contain the size of the property in acres?	☒ Y	☐ N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	☐ Y	☒ N	Site map has not been updated since 2015 and significant construction has occurred.
Does the site map contain directions of storm water flow (indicated by arrows)?	☒ Y	☐ N	Drainage arrows may not match current drainage patterns (some of the septage driveway drains to the west with new curbing rundown(photo 1-2), does not show swale on north side of site (photo 3)). The entire area from the septage seems to currently drain to the swale north of the stormwater pond.
Does the site map contain locations of all existing structural control measures?	☐ Y	☒ N	Site map has not been updated for new construction within 14 days as Per Part 4.2 of permit. There is a note that states that entire facility is graded to direct storm water to the pond on the map. Storm drains and Waste Water drainage system is not shown.
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	☐ N	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	☐ Y	☒ N	No information on map showing which drain inlets go to the headworks and which go to the stormwater pond. New construction has changed some drainage patterns. The facility boundary was expanded and it is unknown where a storm drain located on the NE corner of the lab may drain to.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	☐ Y	☒ N	Specific locations of diesel generators(fueling areas) and used oil storage not shown on map(potential pollutants are only listed on the map and specific locations are not indicated).
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	☐ Y	☐ N	N/A.
Does the site map contain locations of all storm water monitoring points?	☒ Y	☐ N	Location of potential storm water outfall #1 is shown on map, however, it is unclear why it was chosen. With the site grading as of 7/10/18 it appears water leaves the site on the northwest corner via a swale and possibly at the

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>	Notes:		
			driveway over the ditch (north of marked outfall) if a very large flow were to occur.
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	☐ N	N/A.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	☐ Y	☐ N	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	☐ Y	☐ N	N/A
Does the site map contain locations of the following activities where these activities are exposed to precipitation? - 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	☒ N	Used oil storage and diesel generator tank fueling area not shown on map.
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	☐ Y	☐ N	N/A Power plant to west is bermed, some run on from street possible.
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	☐ N	N/A
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)?	☒ Y	☐ N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	☒ Y	☐ N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>	<u>Notes:</u>		
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	☐ Y	☐ N	N/A. SWPPP reports no significant spills or leaks have occurred.

<u>Site Description</u>	<u>Notes:</u>		
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: - 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	☒ N	The five outfalls were evaluated 4-17-2012. (The electronic 2017 revision stated they were evaluated August 2015- but specific date was not provided) A new pipe from the steam sterilization at the new lab was noted, no signs of discharge at the time of inspection.
Does salt storage occur at this facility?	☐ Y	☒ N	The plan states the City of Farmington does not store salt at the WWTP. However, the adjacent Roads and Grounds stores some sand and magnesium chloride solution deicer within the new facility fencing.
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	☐ Y	☐ N	N/A

<u>Controls to Reduce Pollutants</u>	<u>Notes:</u>		
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	☐ 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?	☒ 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?	☒ Y	☐ N	

NPDES Industrial Storm Water Checklist (MSGP)

Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	☒ Y	☐ N	
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NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	☒ Y	☐ 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?	☒ Y	☐ N	
Does the SWPPP include a schedule for preventative maintenance procedures?	☒ Y	☐ 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	☐ 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	☐ 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?	☒ Y	☐ N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	☒ 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	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	☒ Y	☐ N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP document erosion and sediment controls?	☒ Y	☐ 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?	☒ Y	☐ N	Not all areas disturbed by construction have been stabilized.
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	☐ N	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	☐ Y	☐ N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	☐ Y	☒ N	Training was conducted April 2017 and June 2016. It has not yet been scheduled for 2018. No documentation that stormwater team members that perform inspections are trained annually.
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	
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?	☒ Y	☐ N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	☒ Y	☐ N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	☒ Y	☐ N	

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	☐ N	Animas Environmental conducts inspections for the facility.
Are inspections documented, including: - 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	☐ N	Inspections are certified by City of Farmington Corporate official. Inspector made an effort to conduct at least one inspection during rain event to verify no discharges. Qualifications of inspectors were not included in plan, only a job title and a statement that they are qualified.
Exceptions, including (see 4.1.3): Inactive and unstaffed sites	☐ Y	☐ N	N/A
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	☐ Y	☒ N	SWPPP states facility does not discharge.
Does the assessment consist of a sample collected: - 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	SWPPP states facility does not discharge.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: • 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	SWPPP states facility does not discharge.
Exceptions, including (see 4.2.3): • 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	Plan states facility is graded to drain to stormwater retention pond and does not discharge. A potential storm water outfall location is shown on the site map.
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	☐ Y	☐ N	N/A- Per 2015 permit part of routine facility inspection
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	☐ Y	☐ N	N/A
Cover all areas of the facility?	☐ Y	☐ N	N/A
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	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Include observations of the following: - 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	☐ N	N/A
Are inspections documented, including: - 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	☐ N	N/A

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	N/A
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	☐ Y	☐ N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	☐ Y	☐ N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	☐ Y	☐ N	N/A
Benchmark Monitoring			
Does the monitoring consist of a sample collected: • 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	N/A
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	☐ Y	☐ N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	☐ Y	☐ N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? - 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	N/A
Exceptions, including (see 6.1 & 6.2): - Adverse weather conditions - Climates with irregular storm water runoff - Snowmelt - Substantially identical outfalls (per 5.1.5.2) - Inactive and unstaffed sites.	☐ Y	☐ N	N/A
Effluent Limitations Monitoring			
Sampled once per year?	☐ Y	☐ N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	☐ Y	☐ N	N/A
Other Required Monitoring			
- State or Tribal provisions - Discharges to impaired waters - Additional monitoring required by EPA.	☐ Y	☐ N	N/A
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	N/A
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	☒ Y	☐ N	Annual reports submitted 1/27/17 and 1/15/18
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	☐ Y	☐ N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
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	<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> Some runoff from transportation to sludge drying area may flow to the north swale rather than to the pond after construction activities regraded the area.(photo 4)
Good Housekeeping	<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> In general, areas were kept neat and orderly and materials were stored out of stormwater flows (photo 6).
Preventative maintenance	<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> Facility is inspected regularly.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<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> Spill procedures and response are discussed in SWPPP. Spill pan used for sodium hypochlorite fill port (photo 5), used oil is stored in containment area. There is no plan for potential diesel generator filling spills in the SWPPP.
Erosion and Sediment Controls	<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> Most areas are paved or stabilized with gravel, north side of site where construction occurred is currently still unstabilized and sediment controls remain(photo 3).
Management of Runoff	<i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i> SWPPP states that facility is bermed to prevent discharge. There is one location at the gate to the outfall where it appears water could overflow during high flows(at least one quarterly inspection is done during rain events to monitor). The northwest part of the facility was regraded during construction and there is currently no berm in that area(photo 4) .
Salt Storage Piles	<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> N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	<i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i> Waste bins are plentiful and used to contain trash materials.
Evidence of non-storm water discharges	No unpermitted non-stormwater discharges were observed on the day of the inspection.
Dust Generation and Vehicle Tracking of Industrial Materials	<i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i> There was some onsite tracking of sludge(photo 4), but in general, the site drains to the headworks or the stormwater pond.

**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Jennifer Foote

Date: 7/10/18

Time: approx. 10 am

City/County: Farmington/San Juan

State: New Mexico

Location: Farmington WWTP

Subject: Septage receiving drains primarily to south but some also to west



**NMED/SWQB
Official Photograph Log
Photo # 2**

Photographer: Jennifer Foote

Date: 7/10/18

Time: approx. 10 am

City/County: Farmington/San Juan

State: New Mexico

Location: Farmington WWTP

Subject: new rundown from septage receiving, flows to west then north of new MRAS Basins



**NMED/SWQB
Official Photograph Log
Photo # 3**

Photographer: Jennifer Foote

Date: 7/10/18

Time: approx. 10 am

City/County: Farmington/San Juan

State: New Mexico

Location: Farmington WWTP

Subject: Swale on north west side of facility. BMPS from construction have not yet been removed



**NMED/SWQB
Official Photograph Log
Photo # 4**

Photographer: Jennifer Foote

Date: 7/10/18

Time: approx. 10 am

City/County: Farmington/San Juan

State: New Mexico

Location: Farmington WWTP

Subject: Berm on northwest side of facility has not been installed yet, sludge may runoff with stormwater to northwest via swale and bypass pond.



NMED/SWQB Official Photograph Log Photo # 5		
Photographer: Jennifer Foote	Date: 7/10/18	Time: approx. 10 am
City/County: Farmington/San Juan	State: New Mexico	
Location: Farmington WWTP		
Subject: fill port for sodium hypochlorite with drip pan		



NMED/SWQB Official Photograph Log Photo # 6		
Photographer: Jennifer Foote	Date: 7/10/18	Time: approx. 10 am
City/County: Farmington/San Juan	State: New Mexico	
Location: Farmington WWTP		
Subject: some storage occurring outside of curbed/bermed areas		



Attachment 1
Sign In Sheet



United States Environmental Protection Agency
Region 6 – Water Enforcement Branch
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733



DATE: 10 July 18
TIME: 08:35
SUBJECT: City of Farmington WWTP (NM0020583)

MEETING ATTENDEES

NAME	COMPANY	PHONE NO.	EMAIL
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Attachment 2
Proposed Construction Site Map
(Received 7/17/18)

