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## Menu

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If you are intending to access the MSGP program service, please know that it will only work when using Internet Explorer with Adobe Acrobat Reader.



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# 2015 NPDES Multi-Sector General Permit For Stormwater Discharges Associated With Industrial Activity (MSGP) Forms

United States Environmental Protection Agency  
1200 Pennsylvania Ave, NW Washington, DC 20460

Note: This is a "smart form"; as you fill out the form, additional questions will appear that you will need to answer.

## Permit Information

### 1. What action would you like to take? \*

Change an Existing Notice of Intent Form (e.g. Make changes to Facility information, Discharge information, Monitoring requirements, etc.)

Submission of this Notice of Intent (NOI) constitutes notice that the operator identified in the Facility Operator Information section of this form requests authorization to discharge pursuant to the NPDES Stormwater Multi-Sector General Permit (MSGP) permit number identified in the Permit Information section of this form. Submission of this NOI also constitutes notice that the operator identified in the Facility Operator Information section of this form meets the eligibility conditions of Part 1.1 of the MSGP for the facility identified in the Facility Information section of this form. To obtain authorization, you must submit a complete and accurate NOI form. Discharges are not authorized if your NOI is incomplete or inaccurate or if you were never eligible for permit coverage.

### Operator Name (Organization Name) \*

Red Cedar Gathering Company

### Operator Name as Noted by the NOI Preparer

Red Cedar Gathering Company

Provide the existing NPDES ID for the Notice of Intent that you would like to update and click the Submit button.

### 2. NPDES ID \*

COR051300: Red Cedar Gathering Company

Confirm NPDES ID: COR051300: Red Cedar Gathering Company \*

3. Which type of change are you making? Options 2 and 3 cannot be selected together on the same form. If you need to make both Facility Monitoring Changes (option 2) and changes to Discharge Information, SIC Code/Activity Code, Sectors/Subsectors, or Outfall information (option 3), please submit two separate forms. Submit any changes under option 3 before submitting Facility Monitoring Changes (option 2). If you have previously submitted Facility Monitoring Changes (option 2) for this NPDES ID, please contact your EPA Regional permitting authority before submitting changes under option 3.

1. Facility Operator Info (only for typographical errors or re-naming without change of ownership), Facility Name/Address, Other Permit Number, SWPPP Information, Estimated Area of Industrial Activity, MS4 Discharge, or Historic Preservation Criterion

2. Please indicate if any of the below monitoring changes applies to your facility. Reporting any of the below changes to your monitoring requirements will trigger changes to your monitoring requirements in EPA's NetDMR system (e.g., if you report below that you are no longer subject to benchmark monitoring for all parameters, your NetDMR form will no longer be prepopulated with your benchmark monitoring requirements).

\* Note that if you have changes to your monitoring requirements that are not described below, you must contact your Regional permitting authority who will be able to change your monitoring requirements in NetDMR.

Options C and D are mutually exclusive and cannot be selected together or with any other option. Additionally, options A and E cannot be selected together. If you need to submit Facility Monitoring Changes that

3. Discharge Information, SIC Code/Activity Code, Sectors/Subsectors, Outfall information

4. Endangered Species Criterion

2. Select the state/territory where your facility is located \*

CO

3. Is your facility located on Indian Country lands? \*

Yes  No

3a. Select the Indian Country lands \*

Other

3aa. Other \*

Southern Ute Indian Tribe

4. Are you requesting coverage as a "federal operator" as defined in Appendix A? \*

Yes  No

5. Are you a new discharger or a new source as defined in Appendix A? \*

Yes  No

5a. Have stormwater discharges from your facility been covered previously under an NPDES permit? \*

Yes  No

5aa. Provide your most current NPDES ID (i.e., permit tracking number) if you had coverage under EPA's MSGP 2008 or the NPDES permit number if you had coverage under an EPA individual permit \*

COR05A07I

6. Do you directly discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 3 water (Outstanding National Resource Water) (See Appendix L)? Your project will be considered to discharge to a Tier 3 water if the first water of the US to which you discharge is identified by a state, tribe, or EPA as a Tier 3 water. For discharges that enter a storm sewer system prior to discharge, the first water of the US to which you discharge is the waterbody that receives the stormwater discharge from the storm sewer system. \*

Yes  No

7. Does your facility directly discharge to a Federal CERCLA site listed in Appendix P? For the purposes of this permit, a permittee discharges to a Federal CERCLA site if the discharge flows directly into the site through its own conveyance, or through a conveyance owned by others, such as a municipal separate storm sewer system. \*

Yes  No

8. Has the Stormwater Pollution Prevention Plan (SWPPP) been prepared in advance of filing this NOI, as required? \*

Yes  No

9. By indicating "Yes", I confirm that I understand that the MSGP only authorizes the allowable stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges listed in Part 1.1.3. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.1.2 and 1.1.3 will be discharged, they must be covered under another NPDES permit. \*

Yes  No

10. Master Permit Number

COR05I000

B: Facility Information

Identify the applicable sector and subsector of your primary industrial activity (See Appendix D) that best represents the products produced or services rendered for which your facility is primarily engaged, as defined in the MSGP, and the 4-digit Standard Industrial Classification (SIC) code or 2-letter Activity Code:

15. Sector \*

SECTOR I: OIL AND GAS EXTRACTION

16. Primary SIC Code \*

1311: Crude Petroleum And Natural Gas

17. Subsector

11: Crude Petroleum and Natural Gas

Check to add an additional Sector and Subsector.

22. Is your facility presently inactive and unstaffed? \*

Yes  No

23. Is your facility expected to be inactive and unstaffed for the entire permit term? \*

Yes  No

In the event your Facility becomes active during this permit cycle, you must submit a Change NOI to indicate that your Facility has become active.

**Outfalls**

4. List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in decimal degrees for each outfall.

A. Outfall ID \*      B. Latitude (Decimal Degrees) \*      C. Longitude (Decimal Degrees) \*

001	+	37.0140	-	108.0627
-----	---	---------	---	----------

(This button will prepopulate the receiving water information associated with your outfall on your form. You may edit the information that is returned if you believe it is incorrect)

If for any reason the Lookup Receiving Water Information button does not prepopulate your form with receiving waters information, you must manually enter the information on your form.

**Outfall Section**

1. Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to. (You may edit the name of the water of the U.S. that was returned if incorrect.) \*

Coyote Gulch

2. Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? \*

Yes       No

3. Has a TMDL been completed for this receiving waterbody? \*

Yes       No

Provide the following information about your outfall latitude longitude.

5. Latitude/Longitude Data Source *	6. Horizontal Reference Datum
Other	NAD83

7. Does your facility discharge into a Municipal Separate Storm Sewer System (MS4)? \*

Yes       No

8. Do you discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water) (See Appendix L)? \*

Yes       No

**Certification Information**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. 40 CFR 122.22 (d)

**RED CEDAR GATHERING COMPANY**  
**COYOTE GULCH GAS TREATING PLANT**  
STORMWATER POLLUTION PREVENTION PLAN

**ACTIVE/INACTIVE STATUS CHANGE**

**Instructions:** If Coyote Gulch Gas Treating Plant changes its status from active to inactive and unstaffed (or from inactive/unstaffed to active), complete this form to document when and why the change in status occurred.

**Date of the Change in Status:** 1/17/2018

**New Facility Status:**  **Inactive and Unstaffed**     **Active**

**Reason for change in status:**

The Red Cedar Gathering Company's Coyote Gulch Gas Treating Plant, a Sector I Oil and Gas Extraction facility, halted industrial activities in December 2016, and is inactive and unstaffed. There are no industrial materials or activities exposed to stormwater. Specifically, the following were removed from the plant site:

1. All fluids (lube oil, coolant, amine, TEG, oily wastewater, diesel, gas, etc.) from all tanks, piping, sumps, equipment, etc.;
2. All waste material (oily as well as non-oily waste) in dumpsters;
3. All drums and other containers unless
  - a. they are stored in a storm resistant shelter OR
  - b. they have no residual on the outside of the container, are tightly closed, are not deteriorating, and are empty or not leaking if containing product.

In addition, all spills and leaks within secondary containment were cleaned up and disposed of properly. Any contaminated soils due to spills or leaks to the ground have been removed and disposed of properly.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained herein. Based on my inquire of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained herein is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

Name: Dan Jefferson

Title: Director of Environmental, Health & Safety

Signature: 

Date: 1/17/18

RED CEDAR GATHERING COMPANY  
COYOTE GULCH GAS TREATING PLANT  
STORMWATER POLLUTION PREVENTION PLAN

**AMENDMENT 1**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained herein. Based on my inquire of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained herein is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

Name: Dan Jefferson

Title: Director of Environmental Health & Safety

Signature: 

Date: 11/7/18

*RED CEDAR GATHERING COMPANY*  
**COYOTE GULCH GAS TREATING PLANT**  
*STORMWATER POLLUTION PREVENTION PLAN*

**AMENDMENT 1**

The following modifications were made on **January 17, 2018** to the SW3P:

- Due to a decline in natural gas requiring treatment, the Coyote Gulch Gas Treating Plant was shut down December 2016. The plant is currently inactive and unstaffed. There are no industrial materials or activities exposed to stormwater. Documentation supporting the claim of the change in status from active to inactive and unstaffed has been prepared and placed in Appendix B of the SW3P. Figure 2 Site Map was revised to reflect changes in industrial materials and activities that are no longer exposed to stormwater. In addition, the NOI has been modified indicating that it is inactive and unstaffed and re-certified.

Red Cedar Gathering Company (RCGC) will be exercising the exception for conducting inspections on a routine basis (Part 3.1.1 if the 2015 MSGP) and quarterly visual assessment (Part 3.2.3 if the 2015 MSGP). RCGC will conduct annual inspections as long as the plant is inactive and unstaffed.

If circumstances change and industrial materials or activities become exposed to stormwater or the plant becomes active and/or staffed, this exception will no longer apply. Routine facility inspections and quarterly visual assessments will be resumed immediately. The NOI will be modified indicating that the plant is active and/or staffed and re-certified. Documentation supporting the claim of the change in status from inactive and unstaffed to active and/or staffed will be prepared and placed in Appendix B of the SW3P.

- Figure 2 Site Map was revised to reflect changes in industrial materials and activities that are no longer exposed to stormwater.



Coyote Gulch Gas Treating Plant  
Southern Ute Indian Tribe Reservation  
La Plata County, Colorado

*Stormwater Pollution Prevention Plan*

Prepared for  
Red Cedar Gathering Company  
Durango, Colorado

Prepared By  
Southern Ute Indian Tribe Growth Fund  
Safety and Environmental Compliance Management Group

August 2015



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**1 PLAN CERTIFICATION**

**1.1 Stormwater Pollution Prevention Plan Preparer Certification**

I certify that this document and all attachments were prepared under my direction or supervision by a qualified erosion, sediment and pollution control specialist (Certified Professional in Erosion and Sediment Control (CPESC) or in Storm Water Quality (CPSWQ)) in accordance with the terms and conditions of the most current version of Regulations (e.g. CGP 2012) and/or recommendations (e.g. SUIR) for stormwater discharges from construction activities. I recognize that it is unlawful for any person to cause or contribute to a violation of water quality standards. I also understand that the owner or operator must comply with the information submitted, and that failure to do so may result in a knowing violation of current regulations. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

  
Signature of Preparer

8/27/15  
Date

  
Signature of Reviewer  
SEAL OF Reviewer

08/27/2015  
Date



**1.2 Responsible Party Certification**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Dan Jefferson

Title: Director of Environmental, Health, & Safety

Company: Red Cedar Gathering Company

Signature: 

Date: 8/27/15

2 FACILITY INFORMATION

Facility Information

Name of Facility: Coyote Gulch Gas Treating Plant

Street: SE/4 of Section 17, T32N, R11W, NMPM

City: NA State: CO ZIP Code: NA

County or Similar Subdivision: La Plata County

NPDES ID (i.e., permit tracking number): COR05A071 (if covered under a previous permit)

Primary Industrial Activity SIC code, and Sector and Subsector (2015 MSGP, Appendix D and Part 8):

Primary SIC: 1311 Sector: I Subsector: I1

Co-located Industrial Activity(s) SIC code(s), Sector(s) and Subsector(s) (2015 MSGP, Appendix D):

Secondary SIC: 1389 Sector: I Subsector: I1

Latitude/Longitude of Center of Facility

Latitude: 37.0136° N (decimal degrees) Longitude: 108.0612° W (decimal degrees)

Method for determining latitude/longitude (check one):

- USGS topographic map (specify scale: ) GPS
Other (please specify): Arc Map

Horizontal Reference Datum (check one):

- NAD 27 NAD 83 WGS 84

Is the facility located in Indian country? Yes No

If yes, name of Reservation, or if not part of a Reservation, indicate "not applicable."

Southern Ute Indian Tribe

Are you considered a "federal operator" of the facility?

Federal Operator - an entity that meets the definition of "operator" in this permit and is either any department, agency or instrumentality of the executive, legislative and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality.

- Yes No

Estimated area of industrial activity at site exposed to stormwater: 11 (acres)

Discharge Information

Does this facility discharge stormwater into a municipal separate storm sewer system (MS4)?

- Yes No

If yes, name of MS4 operator:

Name(s) of surface water(s) that receive stormwater from your facility:

Coyote Gulch

Does this facility discharge industrial stormwater directly into any segment of an "impaired water" (see definition in 2015 MSGP, Appendix A)? Yes No

If Yes, identify name of the impaired water(s) (and segment(s), if applicable):

---

Identify the pollutant(s) causing the impairment(s):

---

Which of the identified pollutants may be present in industrial stormwater discharges from this facility?

---

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants? If yes, please list the TMDL pollutants:

---

Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water (see definitions in 2015 MSGP, Appendix A)? Yes No

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2015 MSGP Table 1-1)? Yes No

If Yes, which guidelines apply?

---

### 3 CONTACT INFORMATION/RESPONSIBLE PARTIES

#### Facility Operator(s):

Name: Red Cedar Gathering Company  
Address: 125 Mercado Street, Suite 201  
City, State, Zip Code: Durango, CO 81301  
Telephone Number: 970-764-6900  
Email address: NA  
Fax number: 970-382-0462

#### Facility Owner(s):

Name: Red Cedar Gathering Company  
Address: 125 Mercado Street, Suite 201  
City, State, Zip Code: Durango, CO 81301  
Telephone Number: 970-764-6900  
Email address: NA  
Fax number: 970-382-0462

**SWPPP Contact(s):**

SWPPP Contact Name (Primary): Dan Jefferson

Telephone number: 1970-764-6972

Email address: djefferson@redcedargathering.com

Fax number: 970-382-0462

#### 4 POLLUTION PREVENTION TEAM

The following positions comprise the Coyote Gulch GTP Stormwater Pollution Prevention Team. The Team is responsible for assisting in developing, implementing, maintaining, and revising the plan and complying with the 2015 MSGP conditions.

**Leader:** Dan Jefferson

**Title:** Director of Environmental, Health & Safety

**Plant Phone:** (970) 764-6972

**Cell Phone:** (970) 779-9367

**Responsibilities:** Responsible for overall compliance with 2015 MSGP. Files and distributes inspection, safety and training data. Oversees the development of the SW3P and any modifications to it. Updates files and manuals, assists in training and inspections. Conducts quarterly routine facility inspections, quarterly visual assessments, and rain event inspections when needed. Identifies the corrective actions that need to be taken in response to conditions that triggered the need for corrective action. Ensures that corrective action reports are prepared and corrective actions are implemented. Ensures the preparation and submittal of any required reports such as Annual Report.

**Members:**

(1) Jason Lasster

**Title:** Plant Operations Supervisor

**Phone:** (970) 764-6892

**Cell Phone:** (970) 749-8735

**Responsibilities:** Supervises plant operations and plant operators. Coordinates all components of SW3P implementation including employee training program, inspections, stormwater visual assessments, and corrective actions. Makes sure that any other follow-up actions or maintenance that are identified during the monthly inspection or the quarterly routine facility inspection are completed.

(2) Eric Goats

**Title:** Area 2 Maintenance Supervisor

**Phone:** (970) 764-6811

**Cell Phone:** (970) 769-2813

**Responsibilities:** Supervises plant mechanics and equipment maintenance. Assists plant operations in ensuring that any other follow-up actions or maintenance that are identified during the monthly inspection or the quarterly routine facility inspection are completed.

(3) Facility PSM Coordinator

**Title:** Same

**Phone:** (970) 764-6860

**Cell Phone:** (970) 759-6433

**Responsibilities:** Maintains monthly SPCC / SW3P inspection and corrective action report files. Makes sure that any other follow-up actions or maintenance that are identified during the monthly inspection or the quarterly routine facility inspection are completed. Conducts monthly inspections. Assists with conducting routine facility inspections after rain events when needed and conducts quarterly visual assessments.

(4) Plant Operator

**Title:** Same

**Phone:**

**Cell Phone:**

**Responsibilities:** Conducts monthly inspections. Conducts routine facility inspections after rain events when needed.

## 5 SITE DESCRIPTION

### 5.1 Activities at Facility

The Coyote Gulch Gas Treating Plant (GTP) removes carbon dioxide and dehydrates the inlet gas stream to meet pipeline specifications. Coyote Gulch GTP was designed to treat approximately 260 million standard cubic feet per day (mmscfd) of natural gas is recompressed and delivered into the TransColorado natural gas transmission line.

The facility removes carbon dioxide from the natural gas stream via two treatment trains. Operations at the facility began in December 1996 when Train 1 went into operation at a rate of 120 mmscfd. Train 2 went into operation in June 1998 and can treat up to 140 mmscfd. Carbon dioxide (CO<sub>2</sub>) comprises up to 14% (volume) of the inlet gas stream and is treated down to 2% CO<sub>2</sub>.

Currently due to the decline of natural gas, Train 2 is out of service. The amine/water was removed from the system. Train 1 is currently operating and treating approximately 53 mmscfd.

### 5.2 General Location Map

Figure 1 shows the general location of the Coyote Gulch GTP and is located in Appendix C.



### 5.3 Site Map

The site map of the Coyote Gulch GTP is provided as Figure 1, General Location Map, and Figure 2, Site Map. The site map(s) will be revised as a change occurs in the facility layout, the sediment and erosion control BMPs, stormwater management measures, location and/or types of potential pollutants, locations of stormwater monitoring, etc. The site maps are located in Appendix C.

The site maps provide the following information.

- ◆ *Boundaries of the property and the size of the property in acres;*  
The size of the leased property is 18 acres. However, industrial activities only take place on 11 of the 18 acres. The lease boundary and the industrial activity/permit area boundary are shown on Figures 1 and 2.
- ◆ *Location and extent of significant structures and impervious surfaces;*  
Structures and impervious surfaces are shown on Figure 2.
- ◆ *Directions of stormwater flow;*  
The directions of stormwater flow are shown on Figure 2.
- ◆ *Locations of all stormwater control measures;*  
Stormwater control measures are shown on Figure 2.
- ◆ *Locations of all receiving waters, including wetlands, in the immediate vicinity of your facility. Indicate which waterbodies are listed as impaired and which are identified by your state, tribe or EPA as Tier 2, Tier 2.5, or Tier 3 waters;*  
The location of the receiving water is shown on Figures 1 and 2. There are no wetlands in the immediate vicinity of the facility. The receiving water is not listed as impaired or identified as a Tier 2, Tier 2.5, or Tier 3 waters.
- ◆ *Locations of all stormwater conveyances including ditches, pipes, and swales;*  
The locations of all ditches, pipes and swales are shown on Figure 2.
- ◆ *Locations of potential pollutant sources identified under Part 5.2.3.2;*  
The locations of potential pollutant sources are shown on Figure 2.
- ◆ *Locations where significant spills or leaks identified under Part 5.2.3.3 have occurred;*  
The locations of any major spills and leaks are shown on Figure 2.
- ◆ *Locations of all stormwater monitoring points;*  
The location of the stormwater monitoring point is shown on Figure 2.
- ◆ *Locations of stormwater inlets and discharge points, with a unique identification code for each discharge point (e.g., Discharge points001, 002), indicating if you are treating one or more discharge points as "substantially identical" under Parts 3.2.3, 5.2.5.3, and 6.1.1, and an approximate outline of the areas draining to each discharge point;*  
The location of the stormwater outfall, Outfall No. 001, and the drainage area for the outfall are shown on Figure 2.
- ◆ *If applicable, MS4s and where your stormwater discharges to them ;*  
There are no municipal separate storm sewer systems in the vicinity of the facility.
- ◆ *Areas of designated critical habitat for endangered or threatened species, if applicable;*  
There are no designate critical habitat for endangered or threatened species in the vicinity of the facility.
- ◆ *Location and description of all non-stormwater discharges identified under Part 2.1.2.10;*  
The location of the de-ionized water discharge is shown on Figure 2.
- ◆ *Locations of the following activities where such 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 traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;*
- *transfer areas for substances in bulk;*
- *machinery; and*
- *locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants.*

The locations of the activities listed above except for run-on are shown on Figure 2. There are no sources of run-on from adjacent property that contains significant quantities of pollutants.

- ◆ *Locations of Reportable Quantity (RQ) releases;*  
One reportable quantity release has occurred at the facility and its location is shown on Figure 2.
- ◆ *Locations of chemical mixing areas;*  
There are no chemical mixing areas at the Coyote Gulch GTP.
- ◆ *Locations of construction and drilling areas;*  
There are no drilling activities at this facility. If construction activities that disturb < 1 acre take place at the facility, a construction site map will be prepared.
- ◆ *Locations of areas subject to the effluent guidelines requirements for “No Discharge” in accordance with 40 CFR 435.32;*  
Since there are no drilling activities at the facility and the facility does not provide services for drilling operations, there are no drilling muds, drill cuttings or produced sand at the site. There is no produced water at the facility. Therefore, no areas are subject to the effluent limit guidelines since there is no produced water, drilling muds, drill cuttings, or produced sand located at the facility that can come in contact with stormwater.
- ◆ *Locations of the structural controls to achieve compliance with the “No Discharge” requirements.*  
Since effluent limit guidelines are not applicable to this facility, structural controls specifically for achieving compliance with “No Discharge” requirements are not required.

## **6 SUMMARY OF POTENTIAL POLLUTANT SOURCES**

### **6.1 Activities in the Area and Pollutants**

Industrial activities and the associated potential pollutant source(s)/significant material(s) for each activity that are exposed to stormwater at the Coyote Gulch GTP are identified in Table 1 *Industrial Activities, Potential Pollutant Sources, and Control Measures/Best Management Practices (BMPs)*.

There are no chemical, cement, mud or gel mixing or drilling or mining activities at the facility.

Table 1 also provides the control measures/BMPs to be implemented to control pollutants

associated with each activity. Table 2 *Summary of Control Measures/Best Management Practices (BMPs)* provides detailed descriptions of the control measures/BMPs.

## 6.2 Reportable Quantity Spill

The requirement to obtain coverage under the Multi-Sector General Permit for stormwater discharges associated with industrial activities (MSGP) was triggered by a reportable quantity spill that took place in 2002. A description of the spill is provided below.

On August 21, 2002, the oil/water overflow sump for the containment drains on Train 2 overflowed. The site of the incident is shown on Figure 2. This was the result of extremely heavy rainfall for about 20 minutes in the early morning on that date. The rainfall mixed with some oil in the containments and sump. The sump pump was unable to keep up with the high intensity inflow. The rain/oil mixture overflowed the sump containment and traveled off-site approximately ½ mile down an arroyo to the west of the plant, stopping 100 feet short of a stock pond. The spill was reported to the EPA Region 8, the National Response Center, and the Southern Ute Indian Tribe. Spill incident reports on this incident are provided in Appendix D.

### Spill Response and Clean up

Oil absorbent pads were used to collect free oil in locations where it had accumulated. Oil absorbent socks were used to block the minor drainages downstream of the westernmost extent of the spill to prevent further contamination in the event of additional precipitation. Impacted soils (approximately 30 cubic yards) were excavated and stockpiled onsite in an area lined with plastic and bermed to prevent leaching and run-off. The stockpile was removed to an approved disposal facility in November 2003.

### Spill Investigation

A spill investigation, which was conducted with third-party assistance, found:

- The valve on the pipe leading from the containment drains to the sump was left open which allowed a significant amount of rainfall to enter the sump from the containments.
- The sump pump did not have sufficient flow capacity to keep up with the inflow of water.
- The sump overflowed, sending a mixture of oil and water down gradient approximately ½ mile southwest toward Coyote Gulch.

### Actions Taken to Prevent Future Occurrence

Red Cedar has taken the following actions to prevent a recurrence of a similar event:

- The sump pumps were replaced with larger pumps with higher flow capacities.
- The drain pipe valves on the large concrete containments will be kept closed. When accumulation occurs in the containment, the valves will be opened in a manner that does not overflow the sump.

### 6.3 Spills and Leaks

#### 6.3.1 Areas of Site Where Potential Spills/Leaks Could Occur

POTENTIAL SPILL/LEAK LOCATIONS	OUTFALLS
Compressor*	Outfall No. 001
Train 2 Oil/Water Overflow Sump*	
Train 2 Amine Contactor Tower*	
Train 2 Glycol cooler*	
Train 2 Amine Still*	
Amine Flash Tank*	
Train 1 Dehy*	
Train 1 CO <sub>2</sub> Vent*	
Train 2 CO <sub>2</sub> Vent*	
Train 1 Oily Wastewater Collection AST	
Train 2 Oily Wastewater Collection AST	
Train 1 and 2 Oily Wastewater ASTs (Slop Tanks)	
Train 1 Oil/Water Overflow Sump	
Amine Storage Tank	
Gasoline AST	
Diesel AST	
TEG Storage Tank	
Hot Oil System Makeup Oil AST	

\* Locations where spills or leaks have occurred in the past.

#### 6.3.2 Description of Past Spills/Leaks

A list of significant spills and leaks of oil, toxic or hazardous pollutants that have occurred during the five year period prior to the preparation date of this SW3P is provided in Appendix D. Spill incident reports are kept in Drawer 4 of Cabinet C in the PSM office. If a significant spill or leak

should occur during the period of coverage under the 2015 MSGP, the “Significant Spills and Leaks” form found in Appendix D will be filled out. The location of the 2002 reportable quantity spill as well as the locations of spills/leaks that took place since September 2009 are shown on Figure 2. If a significant spill or leak was to occur in the future, its location will be shown on Figure 2.

#### **6.4 Unauthorized Non-stormwater Discharges Documentation**

Documentation that the Coyote Gulch GTP has been evaluated for the presence of non-stormwater discharges and that all unauthorized discharges have been eliminated is located in Appendix E. The evaluation will consist of a visual inspection during dry weather of the perimeter of the plant site, all drainage ditches/channels/swales that ultimately discharge to the stormwater detention pond, and the inlet and outfall of the stormwater detention pond for the presence of any discharges.

#### **6.5 Salt Storage**

There are *no* storage piles containing salt used for deicing or other commercial or industrial purposes at the Coyote Gulch GTP.

#### **6.6 Sampling Data**

Stormwater sampling and testing was not required under the previous permit term. However, as a BMP, Coyote Gulch GTP collected stormwater samples under the previous MSGP if a stormwater discharge occurred at the outfall of the stormwater detention pond. The samples were tested for oil and grease and pH. Testing for oil was via visual examination to determine if there was a sheen on the water. If there was a sheen, the sample was tested for oil and grease concentrations. Stormwater sampling data can be found in drawer 4 of file cabinet C in the PSM office.

TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices					
Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	Exposed to stormwater during the past 3 years and/or currently? Yes/No	Existing Best Management Practice(s) <sup>2</sup>
<b>MATERIAL STORAGE</b>					
1	Material Storage: Amine Storage Tank	Amine	Amine	Yes	Minimize Exposure #s 6, 9 Good Housekeeping #s 1, 2, 5, 10-12, 15, 20, 24, 25 Maintenance #s 1-4, 7-9 Spill Prevention and Response Procedures #s 1, 3, 6, 14, 18, 20, 21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #3
2	Material Storage: Compressor	Lube Oil Above Ground Storage Tank (AST)	Hydrocarbons	Yes	Minimize Exposure #s 6, 9 Good Housekeeping #s 1, 2, 5, 10-12, 15, 20-22, 24, 25 Maintenance #s 1-4, 7-9 Spill Prevention and Response Procedures #s 1, 3, 14, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #3
3	Material Storage: Compressor	Coolant AST	Glycol	Yes	Minimize Exposure #s 6, 9 Good Housekeeping #s 1, 2, 5, 10-12, 15, 20, 24, 25 Maintenance #s 1-4, 7-9 Spill Prevention and Response Procedures #s 1, 3, 18, 20, 21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #3

<sup>1</sup> The location of an industrial activity at the site can be found on Figure 2 – Site Map using the Identification Number.

<sup>2</sup> Descriptions of the Best Management Practices are provided in Table 2 and in Section 7 of the SW3P.

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
4	Material Storage: Gas Treatment	Triethylene Glycol (TEG) Storage Tank	TEG	Yes	Minimize Exposure #s 6, 9 Good Housekeeping #s 1, 2, 5, 10-12, 15, 20, 24, 25 Maintenance #s 1-4, 7-9 Spill Prevention and Response Procedures #s 1, 3, 6, 14, 18, 20, 21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #3
5	Material Storage: Hot Oil System	Makeup Hot Oil Tank	Hydrocarbons	Yes	Minimize Exposure #s 6, 9 Good Housekeeping #s 1, 2, 5, 10-12, 15, 20-22, 24, 25 Maintenance #s 1-4, 7-9 Spill Prevention and Response Procedures #s 1, 3, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #3
6	Material Storage: Hot Oil System	Hot Oil Relief Tank – 9,000 gallons (emergency only, normally empty)	Hydrocarbons	Yes	Minimize Exposure #s 6, 9 Good Housekeeping #s 1, 2, 5, 10-12, 15, 20-22, 24, 25 Maintenance #s 1-4, 7-9 Spill Prevention and Response Procedures #s 1, 3, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #3

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
7	Material Storage: Train 1 and 2 Oily Wastewater ASTs (Slop Tanks)	Oily wastewater	Hydrocarbons	Yes	Minimize Exposure #s 6, 9 Good Housekeeping #s 1, 2, 5, 10-12, 15, 20-22, 24, 25 Maintenance #s 1-4, 7-9 Spill Prevention and Response Procedures #s 1, 3, 16-21 Management of Runoff #1 Employee Training #1-2 Dust Generation and Vehicle Tracking of Industrial Materials #3
8	Material Storage: Boneyard	Scrapped equipment storage Metal storage Empty Drum Storage	Iron	Yes	Minimize Exposure #s 6 Good Housekeeping #s 5, 9 18 Maintenance #s1, 2 Erosion and Sediment Control Management of Runoff #1 Employee Training #1-2
9	Material Storage: Temporary storage of contaminated soil	Contaminated soil	Hydrocarbons Glycol Amine	Yes	Minimize Exposure #11 Good Housekeeping #5, 9 Maintenance #s 1, 2 Management of Runoff #1 Employee Training #1-2
<b>PROCESSING</b>					
10	Processing: Gas Compression	Compressor: Oil Coolant	Hydrocarbons Glycol	Yes	Minimize Exposure #s 6-8, 12, 13 Good Housekeeping #s 1, 2, 5, 6, 9, 13, 19, 20-25 Maintenance #s 1-3, 5-9 Spill Prevention and Response Procedures #s 16-21, 26 Management of Runoff #s 1, 2 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 2



**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
11	Processing Hot Oil System	Oil	Hydrocarbons	Yes	Minimize Exposure #s 6-8, 12, 15 Good Housekeeping #s 1, 2, 5, 6, 9, 20-22, 24, 25 Maintenance #s 1-3, 5-9 Spill Prevention and Response Procedures #s 16-22 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4
12	Processing: Hot Oil System	Pipe Rack for Hot Oil Piping	Hydrocarbons	Yes	Minimize Exposure #s 6-8, 12, 15 Good Housekeeping #s 1, 2, 5, 6, 9, 20-22, 24, 25 Maintenance #s 1-3, 5-9 Spill Prevention and Response Procedures #s 16-22 Management of Runoff #1 Employee Training #s 1-2
13	Processing: Gas Treatment System  Processing: Gas Treatment System (cont'd)	Amine Flash Tank	Amine	Yes	Minimize Exposure #s 6-10 Good Housekeeping #s 1, 2, 5, 9, 10, 15, 19, 20, 23-25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 1, 3, 9, 18-21 Management of Runoff #1 Employee Training #s 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
14	Processing: Gas Treatment System	Lean Amine Filters and Collection Tank	Amine	Yes	Minimize Exposure #s 6-10 Good Housekeeping #s 1, 2, 5, 9, 10, 15, 20, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 1, 3, 5, 18-21 Management of Runoff #1 Employee Training #s 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4
15	Processing: Gas Treatment System	Lean/Rich Heat Exchanger	Amine	Yes	Minimize Exposure #s 6-10 Good Housekeeping #s 1, 2, 5, 9, 15, 20, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 1, 3, 10, 18-21 Management of Runoff #1 Employee Training #s 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4
16	Processing: Gas Treatment System	Amine Pumps	Amine	Yes	Minimize Exposure #s 6-10 Good Housekeeping #s 1, 2, 5, 9, 15, 20, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 1, 3, 11, 18-21 Management of Runoff #1 Employee Training # 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
17	Processing: Gas Treatment System	Amine Surge Tank	Amine	Yes	Minimize Exposure #s 6-10 Good Housekeeping #s 1, 2, 5, 9,10, 15, 20, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 1, 3, 7, 18-21, 23 Management of Runoff #1 Employee Training # 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4
18	Processing: Gas Treatment System	Vent Tank	Amine	Yes	Minimize Exposure #s 6, 7 Good Housekeeping #s 1, 2, 5, 10, 15, 20, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 1, 3, 7, 18-21 Management of Runoff #1 Employee Training # 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4
19	Processing: Gas Treatment System	TEG Regenerator	TEG	Yes	Minimize Exposure #s 6-8, 10 Good Housekeeping #s 1, 2, 5, 15, 19, 20, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 1, 3, 12, 18-21 Management of Runoff #1 Employee Training # 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
20	Processing: Gas Treatment System	TEG Regen Condensate Overflow Sump	TEG Hydrocarbons	Yes	Minimize Exposure #s 6-10 Good Housekeeping #s 1, 2, 5, 20-25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 4, 18-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4
21	Processing: Train 1 Oily Wastewater Collection AST	Oil Water	Hydrocarbons	Yes	Minimize Exposure #s 6-9 Good Housekeeping #s 1, 2, 5, 6, 10, 15, 20-22, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 3, 15-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4
22	Processing: Train 2 Oily Wastewater Collection AST	Oil Water	Hydrocarbons	Yes	Minimize Exposure #s 6-9 Good Housekeeping #s 1, 2, 5, 6, 10, 15, 20-22, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 3, 15-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
23	Processing: Train 1 Oil/Water Overflow Sump and Pump	Oil Water	Hydrocarbons	Yes	Minimize Exposure #s 6-9, 17 Good Housekeeping #s 1, 2, 5, 6, 10, 15, 20-22, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 3, 15-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4
24	Processing: Train 2 Oil/Water Overflow Sump and Pump	Oil Water	Hydrocarbons	Yes	Minimize Exposure #s 6-9 Good Housekeeping #s 1, 2, 5, 6, 10, 15, 20-22, 24, 25 Maintenance #s 1-9 Spill Prevention and Response Procedures #s 3, 15-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 2, 4
25	Processing: Motor Control Room Center (MCC) Transformers #1, #2, #3 and #4	Mineral Oil	Hydrocarbons	Yes	Maintenance #s 1-3 Spill Prevention and Response Procedures #3, 16-21, 25 Management of Runoff #1 Employee Training #s 1-2
26	Processing: Control Room Transformers #1 and #2	Mineral Oil	Hydrocarbons	Yes	Maintenance #s 1-3 Spill Prevention and Response Procedures #3, 16-21, 25 Management of Runoff #1 Employee Training #s 1-2

TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices					
Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	Exposed to stormwater during the past 3 years and/or currently? Yes/No	Existing Best Management Practice(s) <sup>2</sup>
27	Processing: Maintenance Shop Transformers #1 and #2	Mineral Oil	Hydrocarbons	Yes	Maintenance #s 1-3 Spill Prevention and Response Procedures #3, 16-21, 25 Management of Runoff #1 Employee Training #s 1-2
<b>MATERIAL HANDLING - LOADING</b>					
28	Material Handling: Amine Storage Tank	Loading	Amine	Yes	Minimize Exposure #s 6, 9, 11 Good Housekeeping #s 5, 15, 20, 24, 25 Maintenance #s 1-4, 7-9 Spill Prevention and Response Procedures #s 1, 3, 14, 18-21 Management of Runoff #1 Employee Training # 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4
29	Material Handling: Gasoline AST	Loading	Hydrocarbons	Yes	Minimize Exposure #s 4, 6, 9, 11 Good Housekeeping #s 15, 16, 20-25 Maintenance #s 1-4, 8, 9 Spill Prevention and Response Procedures #s 1, 3, 14, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4
30	Material Handling: Diesel AST	Loading	Hydrocarbons	Yes	Minimize Exposure #s 4, 6, 9, 11 Good Housekeeping #s 15, 16, 20-25 Maintenance #s 1-4, 8, 9 Spill Prevention and Response Procedures #s 1, 3, 14, 16-21 Management of Runoff #1 Employee Training #s 1-2

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
					Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4
31	Material Handling: Compressor Lube Oil AST	Loading	Hydrocarbon	Yes	Minimize Exposure #s 6, 9, 11 Good Housekeeping #s 15, 16, 20-25 Maintenance #s 1-4, 8, 9 Spill Prevention and Response Procedures #s 1, 3, 14, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4
32	Material Handling: Compressor Coolant AST	Loading	Glycol	Yes	Minimize Exposure #s 6, 9, 11 Good Housekeeping #s 15, 19, 20, 24, 25 Maintenance #s 1-4, 7, 8 Spill Prevention and Response Procedures #s 1, 3, 18-21 Management of Runoff #1 Employee Training #s 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4
33	Material Handling: TEG Storage Tank	Loading	TEG	Yes	Minimize Exposure #s 6, 9, 11 Good Housekeeping #s 15, 19, 20, 24, 25 Maintenance #s 1-4, 7, 8 Spill Prevention and Response Procedures #s 1, 3, 8, 14, 18-21 Management of Runoff #1 Employee Training #s 1 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
34	Material Handling: Hot Oil System Makeup Oil AST	Loading	Hydrocarbon		Minimize Exposure #s 6, 9, 11 Good Housekeeping #s 15, 16, 20-25 Maintenance #s 1-4, 8, 9 Spill Prevention and Response Procedures #s 1, 3, 14, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4
<b>MATERIAL HANDLING - UNLOADING</b>					
35	Material Handling: Train 1 and 2 Oily Wastewater ASTs (Slop Tanks)	Unloading	Hydrocarbon	Yes	Minimize Exposure #s 4, 6, 9, 11 Good Housekeeping #s 15, 16, 20-25 Maintenance #s 1-4, 8, 9 Spill Prevention and Response Procedures #s 1, 3, 15, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4
36	Material Handling:: Train 1 Oily Wastewater Collection AST	Unloading	Hydrocarbon		Minimize Exposure #s 4, 6, 9, 11 Good Housekeeping #s 15, 16, 20-25 Maintenance #s 1-4, 8, 9 Spill Prevention and Response Procedures #s 1, 3, 15, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4



**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
37	Material Handling: Train 2 Oily Wastewater Collection AST	Unloading	Hydrocarbon		Minimize Exposure #s 4, 6, 9, 11 Good Housekeeping #s 15, 16, 20-25 Maintenance #s 1-4, 8, 9 Spill Prevention and Response Procedures #s 1, 3, 15, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4
38	Material Handling: Train 1 Oil/Water Overflow Sump	Unloading	Hydrocarbon		Minimize Exposure #s 4, 6, 9, 11 Good Housekeeping #s 15, 16, 20-25 Maintenance #s 1-4, 8, 9 Spill Prevention and Response Procedures #s 1, 3, 15, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4
39	Material Handling: Train 2 Oil/Water Overflow Sump	Unloading	Hydrocarbon		Minimize Exposure #s 4, 6, 9, 11 Good Housekeeping #s 15, 16, 20-25 Maintenance #s 1-4, 8, 9 Spill Prevention and Response Procedures #s 1, 3, 15, 16-21 Management of Runoff #1 Employee Training #s 1-2 Dust Generation and Vehicle Tracking of Industrial Materials #s 1-4

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
<b>EQUIPMENT FUELING AND MAINTENANCE</b>					
40	Equipment Fueling	Fueling: Off - highway diesel storage tank Gasoline Storage Tank	Hydrocarbons	Yes	Minimize Exposure #s 4, 6 Good Housekeeping #s 10-12, 15-16, 20-25 Maintenance #s 1-3, 8, 9 Spill Prevention and Response Procedures #s1, 3, 15, 16, 20-22, 24,25 Management of Runoff #1 Employee Training #s 1-2
41	Equipment/ Vehicle Maintenance	Drum Storage: Lube and other oil based products.	Hydrocarbons	Yes	Minimize Exposure #s 5, 6, 8 Good Housekeeping #s 10-12, 14, 15, 17-22, 24, 25 Maintenance #s 1, 2, 8, 9 Spill Prevention and Response Procedures #s 1-3, 16-21 Management of Runoff #1 Employee Training #s 1-2
42	Equipment/ Vehicle Maintenance	Waste disposal of oil rags, oil and gas filters, batteries, coolants	Oil, heavy metals, solvents	Yes	Minimize Exposure #s 5 Good Housekeeping #s 5, 6, 9 Maintenance #s 1, 2 Management of Runoff #1 Employee Training #s 1-2
43	Equipment/ Vehicle Maintenance	Oil recycling tank on trailer Lubricants, solvents, and other chemical substances Fluid replacement including oil, radiator fluids, grease	Hydrocarbons, oil, heavy metals	Yes	Minimize Exposure #s 3, 5, 6, 7, 8, 12 Good Housekeeping #s 4, 5, 11-15, 17-25 Maintenance #s 1, 2, 5-9 Spill Prevention and Response Procedures #s 1-3, 18-21, 26 Management of Runoff #1 Employee Training #s 1-2

TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices					
Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
44	Facility Roads	Vehicle traffic	Dust, TSS, TDS, turbidity	Yes	Maintenance #s 1, 2 Erosion and Sediment Control Management of Runoff Dust Generation and Vehicle Tracking #s 1- 4
45	Portable Sanitary Facility	Sanitary Wastes	Untreated raw septage, bacteria, disinfectants	Yes	Good Housekeeping #s 7, 8 Management of Runoff #1 Employee Training # 1
46	Solid Waste Handling	Refuse, litter	Metals, floatables, etc.	Yes	Minimize Exposure #s 1, 2 Good Housekeeping #s 1- 4 Maintenance #s 1, 2 Management of Runoff #1 Employee Training # 1
<b>EQUIPMENT CLEANING</b>					
47	Compressors	Alkaline detergent, lubricants, oil, dirt	TSS, TDS, oil and grease, pH	Yes	Minimize Exposure # 6, 13 Good Housekeeping #s 11-15, 20 Management of Runoff # 2 Employee Training # 1
48	Train 1 dehy skid and equipment (TEG Regen)	Alkaline detergent, lubricants, oil, dirt	TSS, TDS, oil and grease, pH	Yes	Minimize Exposure # 6, 13 Good Housekeeping #s 11-15, 20 Management of Runoff # 3 Employee Training # 1

**TABLE 1 Summary Of Potential Pollutant Sources And Best Management Practices**

Identification No. <sup>1</sup>	Industrial Activity	Pollutant Source/ Significant Material	Pollutant	<i>Exposed to stormwater during the past 3 years and/or currently?</i> Yes/No	Existing Best Management Practice(s) <sup>2</sup>
49	Train 2 TEG dehy skid and equipment	Alkaline detergent, lubricants, oil, dirt	TSS, TDS, oil and grease, pH	Yes	Minimize Exposure # 6, 13 Good Housekeeping #s 11-15, 20 Management of Runoff # 4 Employee Training # 1
50	Train 1 amine skid and related equipment:	Alkaline detergent, lubricants, oil, dirt	TSS, TDS, oil and grease, pH	Yes	Minimize Exposure # 6, 13 Good Housekeeping #s 11-15, 20 Management of Runoff # 5 Employee Training # 1
51	Cooler Fans	Chemical additives, dirt	TSS, TDS, pH	Yes	Minimize Exposure #s 6, 14 Good Housekeeping #s 11-15, 20 Management of Runoff # 6 Employee Training # 1

## 7 DESCRIPTION OF CONTROL MEASURES

### 7.1 Control Measures to Meet Technology – Based and Water Quality - Based Effluent Limits

The 2015 MSGP requires that the permittee address the control measure selection and design considerations in Part 2.1.1 of the permit. Following is a description of how Coyote Gulch GTP has addressed this Part.

- *Preventing stormwater from coming into contact with polluting materials is generally more effective, and less costly, than trying to remove pollutants from the stormwater.* Table 2 *Summary of Control Measures/Best Management Practices (BMPs)* describes the control measures that will be implemented at the Coyote Gulch GTP to minimize exposure of pollutant sources to stormwater runoff.
- *Using control measures in combination is more effective than using control measures in isolation for minimizing pollutants in stormwater discharge.* Tables 1 and 2 show how for each pollutant source a number of different control measures will be implemented to minimize pollutants in stormwater runoff.
- *Assessing the type and quantity of pollutants, including their potential to impact receiving waters quality, is critical to designing effective control measures that will achieve the limits in this permit.* Table 1 provides a summary of potential pollutants associated with the industrial activities that will take place at the Coyote Gulch GTP that were identified during the assessment phase of preparing the SW3P. The control measures that have been implemented to minimize stormwater pollution for each type of activity are provided in Tables 1 and 2.
- *Minimizing impervious areas at the facility and infiltrating runoff onsite (including bioretention cells, green roofs, and pervious pavement, among other approaches) can reduce runoff and improve groundwater recharge and stream base flows in local streams, although care must be taken to avoid ground water contamination.* The majority of the site is pervious.
- *Attenuating flow using open vegetated swales and natural depressions can reduce in-stream impacts of erosive flows.* All runoff from the facility is discharged into the stormwater detention pond. The pond is sized to hold more than the calculated runoff volume from a 100 year 24 hour event. In the event the pond fills, the pond will discharge through rocklined outlet.
- *Conserving and/or restoring of riparian buffers will help protect streams from stormwater runoff and improve water quality.* Any riparian buffer will be preserved.
- *Using treatment interceptors (e.g., swirl separators and sand filters) may be appropriate in some instances to minimize the discharge of pollutants.* The stormwater detention pond acts as a treatment interceptor by allowing sediment to settle out prior to being discharged offsite. A spill boom is installed at the inlet and outlet of the pond to remove any oil substances that got past the other control measures implemented to prevent the release of oil products.

Table 2 *Summary of Control Measures/Best Management Practices (BMPs)* provides descriptions of the control measures/BMPs that are implemented at the Coyote Gulch GTP to meet the technology-based and water quality-based effluent limits of the 2015 MSGP.

#### *7.1.1 Minimize Exposure*

See Table 1 for a list of industrial activities/pollutant sources that will be controlled by minimizing exposure. Table 2 provides a description of the control measures to minimize exposure that will be implemented.

#### *7.1.2 Good Housekeeping*

Good housekeeping is applicable to all of the industrial activities/pollutant sources listed in Table 1. Table 2 provides a description of the good housekeeping control measures that will be implemented at the Coyote Gulch GTP.

#### *7.1.3 Maintenance*

See Table 1 for a list of industrial activities/pollutant sources that will be controlled by Maintenance control measures. Table 2 provides a description of the Maintenance control measures to be implemented.

#### *7.1.4 Spill Prevention and Response*

Spill prevention and response measures are applicable to most of the industrial activities/pollutant sources listed in Table 1. Table 2 provides a description of the spill prevention and response procedures and control measures that will be implemented at the Coyote Gulch GTP. Section 8.3 of this SW3P describes the response procedures at Coyote Gulch GTP

In the event of a spill of such materials, the principal steps in responding to the spill are:

- Stop the source of the spill or leak.
- Contain the spill or leak.
- Report the spill to Plant Operations Supervisor or their designee, Red Cedar Director of Environmental, Health & Safety or SUIT GF SECMG.
- Clean up the spill or leak.
- Dispose of materials contaminated by the spill, according to manufacturer's instructions or according to Federal, State, or local requirements.

**TABLE 2 Summary of Control Measures/Best Management Practices (BMPs)**

BMPs	Subcategory	Control Measures/Best Management Practice(s)
Minimize exposure	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 in order to minimize pollutant discharges	<ol style="list-style-type: none"> <li>1. Dumpsters have lids.</li> <li>2. Trash cans have lids.</li> <li>3. Small quantities (hand size containers) of petroleum products, lubricants, and other chemicals are stored out of the weather in enclosures.</li> <li>4. Diesel and gasoline fuel tanks have secondary containment.</li> <li>5. Other petroleum products stored in 55 gallon drums or 5 gallon containers have secondary containment.</li> <li>6. Spills and leaks are cleaned up following the procedures specified in this SW3P and in the Southern Ute Growth Fund "Spill Response, Reporting and Prevention Procedures" manual. This standard operating procedure manual for handling spills of chemicals, oils or wastes provides guidance on response, handling, remediating, and reporting of spills.</li> <li>7. All equipment is monitored for leaks and receives regular scheduled maintenance to reduce the chance of leakage.</li> <li>8. All equipment maintenance is conducted in a manner such that secondary containment, i.e., drip pan, will be used to catch spills or leaks when removing or changing liquids.</li> <li>9. Steel or concrete secondary containments are provided at storage tank locations.</li> <li>10. Concrete curbing is provided at most processing facility locations to prevent commingling of stormwater with potential spills or leaks, which could be discharged from the plant site. These BMP measure are indicated as secondary containments and curbing on Figure 2.</li> <li>11. Any contaminated soil will be stored in lined 55 gallon drums with bolt closure rings and placed within the secondary containment at the Train 1 skid until disposed of at a permitted facility.</li> <li>12. The oil recycling tank on a trailer, which is used to collect oil that is drained from equipment, is emptied to the Train 1 or 2 Oily Wastewater ASTs after each use.</li> <li>13. Washwater from the cleaning of the compressors, Trains 1 and 2 TEG dehy skids and equipment, and the Train 1 amine skid and related equipment is collected and disposed of at a regulated facility, Basin Disposal, Inc.</li> </ol>

**TABLE 2 Summary of Control Measures/Best Management Practices (BMPs)**

BMPs	Subcategory	Control Measures/Best Management Practice(s)
Minimize exposure (cont'd)		<p>14. Cooler fan washing activities are monitored to ensure that the washwater infiltrates or evaporates and that no washwater flows into the stormwater detention pond.</p> <p>15. Process alarms on the hot oil system and pipe rack notify plant personnel when there are problems that could result in an upset.</p> <p>16. High level shut down prevents overflow from the amine surge tanks.</p> <p>17. High level alarm on Train 1 oil/water overflow sump will notify operator in the control room.</p>
Good Housekeeping	<p>Keep exposed areas free of waste, garbage, and floatable debris so that it is not discharged to receiving waters.</p> <p>Routine inspections for leaks and conditions of drums, tanks, and containers</p>	<p>1. Litter and other wastes are picked up and disposed of properly on a regular basis.</p> <p>2. Trash cans are located at strategic locations around the site to reduce potential litter.</p> <p>3. Dumpsters are located onsite to hold solid waste. The solid waste dumpsters are located inside of a chain link cage to control windblown waste.</p> <p>4. A local solid waste disposal company regularly pickups (once per month minimum) and disposes of the wastes in the dumpster(s).</p> <p>5. Wastes are managed and disposed of according to Southern Ute Growth Fund's Waste Management Procedures manual.</p> <p>6. Oily rags, used oil filters and absorbents are disposed of in a special dumpster and are picked up quarterly by a waste contractor for disposal at permitted waste facilities. The dumpster seams are welded closed so that the dumpster cannot leak.</p> <p>7. A licensed sanitary waste management contractor services the portojohn once per month.</p> <p>8. The portojohn is staked to the ground to prevent the facility from being tipped over during high winds and spilling sanitary wastes onto the ground.</p> <p>9. Other wastes such as batteries, etc. are disposed of as per Southern Ute Growth Fund's Waste Management Procedures manual.</p> <p>10. Tanks, drums and containers are visually inspected daily and whenever used. Corrective action is taken as necessary.</p>



**TABLE 2 Summary of Control Measures/Best Management Practices (BMPs)**

BMPs	Subcategory	Control Measures/Best Management Practice(s)
Good Housekeeping (cont'd)	Material inventory and storage procedures	<p>11. A material inventory of all chemicals on site is maintained.</p> <p>12. Safety Data Sheets (SDS) are available for all chemical substances stored on site.</p> <p>13. It is <i>not</i> anticipated that reportable quantities of acids, solvents, paints, chemicals, or other liquid materials will be stored or used at this site.</p> <p>14. Original product labels will be retained on containers.</p> <p>15. All containers will be labeled appropriately. Damaged or otherwise illegible labels will be replaced.</p> <p>16. Diesel and gasoline fuel tanks are stored within secondary containment.</p> <p>17. Other petroleum products stored in 55 gallon drums or 5 gallon containers have secondary containment.</p> <p>18. Any empty drums that are kept on site are kept intact with bungs in place.</p> <p>19. Small quantities (hand size containers) of petroleum products and lubricants as well as other chemicals are stored out of the weather in enclosures.</p>
	Spill response and cleanup	<p>20. Spill cleanup equipment is readily available.</p> <p>21. Spill prevention and response for oil and oil related liquids stored at the Coyote Gulch GTP are conducted in accordance with the Spill Prevention Control and Countermeasures (SPCC) regulations.</p> <p>22. A SPCC plan is in place and fully implemented.</p> <p>23. For non-oil-related materials, only de minimus quantities of hazardous materials such as lubricants and solvents are stored on site or the materials are not listed in 40 CFR Parts 110, 117, or 302.</p> <p>24. The spill cleanup procedures as specified in this SW3P and in the Southern Ute Growth Fund "Spill Response, Reporting and Prevention Procedures" manual will be followed. This standard operating procedure manual for handling spills of chemicals, oils or wastes provides guidance on response, handling, remediating, and reporting of spills.</p> <p>25. Spill response training is provided to employees as part of the employee stormwater and SPCC training.</p>

**TABLE 2 Summary of Control Measures/Best Management Practices (BMPs)**

BMPs	Subcategory	Control Measures/Best Management Practice(s)
Maintenance	Timely inspection and maintenance of stormwater management control measures and BMPs.	<ol style="list-style-type: none"> <li>1. At least quarterly inspections of control measures</li> <li>2. Reasonable steps are taken immediately in response to required maintenance of control measures/BMPs. Maintenance is completed as soon as possible and before the next storm event and no later than within 14 calendar days of the observation.</li> </ol>
	Inspection and testing of facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters.	<ol style="list-style-type: none"> <li>3. Personnel tour the facility daily and visually inspect ASTs, compressors, pumps, piping and valves for obvious signs of potential leaks.</li> <li>4. Equipment, tank and container inspections are conducted monthly and are documented on checklists. Work orders are prepared based on inspection findings.</li> <li>5. All equipment receives regular scheduled maintenance to reduce the chance of leakage.</li> <li>6. All equipment maintenance is conducted in a manner such that secondary containment, i.e., drip pan, will be used to catch spills or leaks when removing or changing liquids.</li> </ol>
	Proper maintenance of facility equipment and systems.	<ol style="list-style-type: none"> <li>7. RCGC's Process Safety Management Mechanical Integrity Program (PSM) ensures that the facility's process equipment and system is properly maintained. This program ensures that the regular inspection and maintenance schedules required for each piece of equipment are conducted. It also is used to maintain the records of the maintenance and repairs performed on all RCGC equipment.</li> <li>8. Spill response equipment and supplies are inspected monthly to ensure they are readily available.</li> <li>9. Spill response training is provided to employees annually as part of the employee stormwater and SPCC training.</li> </ol>
Spill Prevention and Response	Structural controls or procedures used to minimize the potential for leaks, spills and other releases	<ol style="list-style-type: none"> <li>1. Lists and MSDSs of substances used at the Coyote Gulch GTP are maintained.</li> <li>2. Original product labels will be retained on containers.</li> <li>3. All containers will be labeled appropriately.</li> <li>4. The condensate/overflow sump for the TEG Regen has a steel secondary containment.</li> </ol>

**TABLE 2 Summary of Control Measures/Best Management Practices (BMPs)**

BMPs	Subcategory	Control Measures/Best Management Practice(s)
Spill Prevention and Response Procedures (cont'd)		<ol style="list-style-type: none"> <li>5. The lean amine filters and collection tank have secondary containment.</li> <li>6. The amine storage tank has steel secondary containment.</li> <li>7. The amine surge tanks overflow into the vent tanks. The amine in the vent tanks is pumped back into the system. The vent tanks are kept empty so that they have plenty of capacity for the next upset.</li> <li>8. Triethylene glycol storage tank and sump has concrete secondary containment.</li> <li>9. The amine flash tanks have secondary containment.</li> <li>10. The lean/rich heat exchanger has secondary containment.</li> <li>11. Concrete curbing is used as secondary containment for the amine pumps.</li> <li>12. The TEG regenerator has concrete secondary containment.</li> <li>13. "Topping off" during fueling is discouraged.</li> <li>14. The filling of the lube oil ASTs at the compressors, the gasoline AST, the diesel AST, the amine tank, and the TEG storage tanks must be visually monitored.</li> <li>15. Unloading of the Train 1 and Train 2 oily wastewater collection ASTs, the oily wastewater ASTs, and the Train 1 and 2 Oil/Water Overflow Sump Tanks must be visually monitored.</li> <li>16. Spill prevention and response for oil and oil related liquids stored at the Coyote Gulch GTP are conducted in accordance with the Spill Prevention Control and Countermeasure (SPCC) regulations.</li> <li>17. A SPCC plan is in place and fully implemented. <b>Descriptions of the secondary containment for SPCC regulated storage and equipment is provided in the SPCC plan.</b></li> <li>18. The Southern Ute Growth Fund "Spill Response, Reporting and Prevention Procedures" manual will be followed. This standard operating procedure manual for handling spills of chemicals, oils or wastes provides guidance on response, handling, remediating, and reporting of spills.</li> <li>19. Spill prevention and response procedures are covered during SPCC training.</li> <li>20. Spill cleanup equipment is readily available.</li> <li>21. In the event of a spill of such materials, the principal steps in responding to the spill are:</li> </ol>

**TABLE 2 Summary of Control Measures/Best Management Practices (BMPs)**

BMPs	Subcategory	Control Measures/Best Management Practice(s)
Spill Prevention and Response Procedures (cont'd)		<ul style="list-style-type: none"> <li>➤ Stop the source of the spill or leak.</li> <li>➤ Contain the spill or leak.</li> <li>➤ Report spill to Plant Operations Supervisor or their designee, Red Cedar Director of Environmental, Health &amp; Safety or SECMG.</li> <li>➤ Clean up the spill or leak.</li> <li>➤ Dispose of materials contaminated by the spill, according to manufacturer's instructions or according to Federal, State, or local requirements.</li> </ul> <p>22. Process alarms on the hot oil system and pipe rack notify plant personnel when there are problems that could result in an upset.</p> <p>23. High level shut down prevents overflow from the amine surge tanks.</p> <p>24. High level alarm on Train 1 oil/water overflow sump will notify operator in the control room.</p> <p>25. Transformers are sealed.</p> <p>26. The oil recycling tank on a trailer, which is used to collect oil that is drained from equipment, is emptied to the Train 1 or 2 Oily Wastewater ASTs after each use.</p>
Erosion and Sediment Control	<p>Activities and processes for stabilizing exposed soils to minimize erosion.</p> <p>Flow velocity dissipation devices placed at all discharge locations and all structural and non-structural control measures to prevent the discharge of sediment.</p>	<p>1. See Section 7.1.5 of the SW3P for a description of the erosion and sediment control BMPs implemented at the Coyote Gulch GTP.</p> <p>2. See Section 7.1.5 of the SW3P for a description of the flow velocity dissipation devices implemented at the Coyote Gulch GTP.</p>
Management of Runoff	<p>Divert, infiltrate, reuse, contain, or otherwise reduce stormwater runoff, to minimize pollutants in stormwater discharges.</p>	<p>1. Section 7.1.6 of the SW3P for a description of the stormwater runoff management control BMPs implemented at the Coyote Gulch GTP.</p>
	<p>Vehicle and Equipment Cleaning and Maintenance:</p>	<p>2. Compressor Units #3, #4, #6, and #7: An alkaline detergent is used for cleaning the compressor units. All wash water from Compressor #3 and #7 is collected and drains into the Train 1 sump. All wash water from</p>

**TABLE 2 Summary of Control Measures/Best Management Practices (BMPs)**

BMPs	Subcategory	Control Measures/Best Management Practice(s)
Management of Runoff (cont'd)		<p>Compressor #4 and #6 is collected and drains to the Train 2 sump. Both sumps are pumped into the oily wastewater tanks in the northwest corner of the plant. The liquids in the tank are hauled to Basin Disposal, Inc., a waste management disposal company, for final disposal.</p> <p>3. Train 1 TEG dehy skid and equipment: An alkaline detergent is used for cleaning. All washwater is collected is pumped into the dehy drip tank. Liquids in the tank are disposed of by Basin Disposal.</p> <p>4. Train 2 TEG dehy skid and equipment: An alkaline detergent is used for cleaning. All washwater is collected and drains into the Train 2 sump. The sump is pumped into the oily wastewater tanks in the northeast corner of the plant.</p> <p>5. Train 1 amine skid and related equipment: An alkaline detergent is used for cleaning. All washwater is collected and drains into the Train 2 sump. The sump is pumped into the oily wastewater tanks in the northwest corner of the plant.</p> <p>6. Cooler fans: All fans are washed once a year with a mixture of potable water and Foaminator D1, a scale remover containing phosphoric acid. Washwater is not collected but either infiltrates or evaporates in the immediate vicinity of the fans. Washing activities are monitored to ensure that no washwater flows into the stormwater detention pond.</p>
Employee Training	Identify frequency of training.	1. Annual training is provided.
	Identify topics to be covered by the training.	2. Topics to be covered by the stormwater training program include: <ul style="list-style-type: none"> <li>a. An overview of what is in the SW3P;</li> <li>b. Specific control measures used at the facility to meet the conditions of the 2015 MSGP such as:                         <ul style="list-style-type: none"> <li>i. Minimizing Exposure</li> <li>ii. Good Housekeeping</li> <li>iii. Maintenance</li> <li>iv. Spill Prevention and Response</li> <li>v. Erosion and Sediment Controls</li> <li>vi. Management of Runoff</li> </ul> </li> </ul>

TABLE 2 Summary of Control Measures/Best Management Practices (BMPs)		
BMPs	Subcategory	Control Measures/Best Management Practice(s)
Employee Training (cont'd)		<ul style="list-style-type: none"> <li>c. The location of all controls on the site required by this permit, and how they are to be maintained;</li> <li>d. The proper procedures to follow with respect to the permit's pollution prevention requirements;</li> <li>e. Monitoring, inspection, planning, reporting and documentation requirements of the permit; and material management practices.</li> </ul> <p>3. Spill prevention and response procedures are covered during SPCC training.</p>
Dust Generation and Vehicle Tracking of Industrial Materials	Minimize generation of dust and offsite tracking of raw, final, or waste materials.	<ul style="list-style-type: none"> <li>1. The facility roads are surfaced with gravel.</li> <li>2. Gravel or concrete is used to stabilize most of the area located within the facility fence that is not occupied by buildings or equipment.</li> <li>3. The speed limit is 5 miles per hour.</li> <li>4. Off-site tracking of raw, final, or waste materials will be minimized by cleaning up any spills/leaks to the ground and monitoring vehicles exiting the facility.</li> </ul>

#### 7.1.4.1 Special Conditions – Hazardous Substances and Oil

If a release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established in either 40 CFR 110, 40 CFR 117, or 40 CFR 302, occurs during a 24 hour period, the National Response Center (NRC) at **1-800-424-8802** will be notified as soon as personnel working at the site are aware of the discharge. See also Section 8.3 Spill Prevention and Response Procedures of this SW3P.

#### *7.1.5 Sediment and Erosion Control*

Because of safety and fire issues, vegetation is not allowed to grow within the plant area. Therefore, 'permanent' erosion and sediment control BMPs have been installed to stabilize exposed soils. Erosion and sediment control BMPs and flow velocity dissipation devices that are implemented at the Coyote Gulch GTP are described below.

- Turf reinforcement mat is installed at several locations on the west side of the facility in areas that are susceptible to erosion.
- The cut slope on the south side of the south channel located within the facility fence is armored with rock to reduce erosion of the slope.
- Gravel or concrete is used to stabilize most of the area located within the facility fence that is not occupied by buildings or equipment.
- Roads are surfaced with gravel.
- A storage area located on the east side of the facility and outside of the facility fence has been stabilized with gravel.
- Rock check dams are installed in the south channel to reduce erosion in the channel and subsequent sedimentation in the stormwater detention pond.
- Sediment control log check dams are installed as needed in bar ditches to reduce velocity and erosion within the ditch.
- The drainage swales on the north and west side of the facility are rock-lined to reduce erosion in the channel.
- The east half of the south channel (located inside the facility fence) is rock-lined.
- Several channels have been lined with concrete to reduce the potential for erosion.
- A number of culvert inlets are rock-lined.
- Rock outlet protection has been installed at the outfall of the stormwater detention pond, the outfalls of culverts installed within the industrial activity/permit area, and at the outfall of the bar ditch that discharges on the west side of the lease area.
- The stormwater detention pond also acts as a sediment control measure.

Design and construction specifications for some of these BMPs are located in Appendix C. Locations of structural BMPs are shown on Figure 2 – Site Map.

### *7.1.6 Management of Runoff*

See Table 1 for a list of industrial activities/pollutant sources that will be controlled by management of runoff control measures. Stormwater runoff management control BMPs that have been implemented at the Coyote Gulch GTP are described below.

The industrial activity area of the plant site is within a single drainage area, which generally drains in a southwesterly direction. The outfall (Outfall No. 001) is located on the west side of the facility as shown in Figure 2. Storm water flows principally over the gravel surface in the areas of Trains 1 and 2. Some ponding of storm water occurs within the plant site.

The drainage control plan consists of stormwater detention pond and numerous drainage channels, ditches and swales. The pond is designed to store 1.97 acre feet of storm water, which is in excess of the 1.57 acre feet 100-yr runoff volume from the watershed. The excess volume is available for sediment storage and accumulated runoff from previous storms. The pond is lined with a 30 mil reinforced geomembrane.

The south channel is designed to carry a 100-year peak flow of 14.98 cubic feet per second (cfs). A number of ditches and swales have also been installed to direct stormwater runoff from industrial activity areas into the stormwater detention pond. Some of the ditches intercept and divert the runoff around areas of potential pollutant sources. Figure 2 shows the locations of these BMPs. All drainage channels, ditches, and swales located within the industrial activity area discharge into the south side of the pond through the stormwater detention pond inlet structure. If a storm should occur which exceeds the capacity of the pond, the pond will overflow at elevation 6150 feet along its west side. The overflow would discharge into the small unnamed arroyo located to the west of the pond.

Berms, ditches, and site grading are used to divert stormwater run-on away from the industrial activity area of the facility. See Figure 2 for the locations of these stormwater management BMPs. Design and construction specifications for some of these BMPs are located in Appendix C.

### *7.1.7 Salt Storage Piles or Piles Containing Salt*

No salt storage piles or piles containing salt will be located at the Coyote Gulch GTP.

### *7.1.8 Sector Specific Non-Numeric Effluent Limits*

#### 7.1.8.1 Sector I -Oil and Gas Extraction

##### *7.1.8.1.1 Technology-based Effluent Limits for Vegetative Controls;*

Grade drilling is not conducted at this facility. Therefore, the technology-based effluent limits for vegetative controls do not apply to this facility.



### 7.1.9 Non-Stormwater Discharges

There is one allowable non-stormwater discharge at this facility, i.e., de-ionized water.

### 7.1.10 Dust Generation and Vehicle Tracking of Industrial Materials

See Table 1 for a list of industrial activities/pollutant sources that will be controlled by dust generation and vehicle tracking control measures. Table 2 provides a description of dust generation and vehicle tracking control measures to be implemented.

## 8 SCHEDULES AND PROCEDURES FOR CONTROL MEASURES TO COMPLY WITH EFFLUENT LIMITS

### 8.1 Good Housekeeping

Dumpsters are emptied at least once per month. All equipment maintenance waste (including used oil, grease containers, oil filters, etc.) is hauled offsite by waste contractors for disposal at permitted waste facilities at least once per quarter. Tanks, drums and containers are visually inspected daily and whenever used. Tank and container inspections are also conducted monthly as part of the SPCC and SW3P inspections and documented on an inspection checklist.

### 8.2 Maintenance

RCGC's Process Safety Management Mechanical Integrity Program (PSM) ensures that the facility's process equipment and system is properly maintained. This program makes sure that the regular inspection and maintenance schedules required for each piece of equipment are conducted. It also is used to maintain the records of the maintenance and repairs performed on all RCGC equipment. Maintenance is also conducted based on findings of the monthly SPCC and SW3P inspections.

All control measures/BMPs identified in the SW3P will be maintained in effective operation. If site inspections identify BMPs that are not operating effectively, maintenance will be performed before the next anticipated storm event or as necessary to maintain the continued effectiveness of the stormwater controls. If maintenance prior to the next anticipated, storm event is impracticable, maintenance must be scheduled and accomplished as soon as practicable. The effectiveness of nonstructural BMPs is based on maintaining appropriate means to carry them out such as having spill response supplies available and personnel trained. Table 3 provides maintenance procedures as well as maintenance schedules for structural erosion and sediment control and management of runoff BMPs implemented at the Coyote Gulch GTP.

Documentation of maintenance and repairs of control measures will be maintained and will include the following information as applicable:

- Date of regular maintenance
- Date of discovery of control measures/BMP in need of repair/replacement
- Date that the control measure/BMP that needed repair returned to operation
- Justification for any extended maintenance/repair schedules. (The permit requires that repairs be made as expeditiously as possible.)

<b>TABLE 3 Schedules and Procedures for Structural BMP Maintenance</b>	
<b>BMP</b>	<b>Maintenance Schedule/Procedures</b>
Routine maintenance identified during an inspection	On the same day that the routine maintenance is identified. However, if the problem is identified at a time in the work day when it is too late to take action, the initiation of action must begin no later than the following work day.
Repair or replacement of an existing BMP or adding new BMPs identified during an inspection	On the same day that the repair or replacement of the BMP is identified, all reasonable steps must be taken to minimize or prevent the discharge of pollutants until the final repair or replacement can be implemented. However, if the problem is identified at a time in the work day when it is too late to take action, the initiation of action must begin no later than the following work day. Final repairs or replacement of BMPs should be completed before the next storm event if possible, but no later than within 14 days from the time of discovery or, if that is infeasible, within 45 days. Documentation must be prepared to justify why it is infeasible.
Earthen berm	Repair any washouts or breaches along the berm.
Bar ditch	<p>Redefine the ditch as necessary to retain its size and shape.</p> <p>Remove any sediment accumulations to maintain its holding capacity.</p> <p>If erosion is observed in the ditch, check dams should be installed.</p> <p>Remove any weeds growing in the ditch.</p>
Check dams: Sediment control log or rock	<p>Sediment should be removed when it has accumulated to one half of the original height of the dam.</p> <p>Re-entrench check dams that have been undercut.</p>

<b>TABLE 3 Schedules and Procedures for Structural BMP Maintenance</b>	
<b>BMP</b>	<b>Maintenance Schedule/Procedures</b>
Check dams: Sediment control log or rock (cont'd)	<p>If the channel above or below the check dam is eroding, install an additional check dam in the eroded channel.</p> <p>Alterations to a check dam may be needed if runoff is bypassing the dam by flowing around the structure. To stop the bypassing and any side cutting, the ends of the dam may need to be extended farther up the channel slope. Check that the center of the dam is lower than the sides.</p>
Inlet protection – rock	Sediment accumulations should be removed when sediment impacts the flow capacity of the culvert. Move sediment to a location where it cannot wash back into the ditch or swale.
Outlet protection - rock	Inspect after heavy rains to see if any erosion around the structure has taken place or if any rocks have been dislodged. Immediately make all needed repairs to prevent further damage.
Sediment barrier: Sediment control log.	<p>Sediment should be removed when sediment accumulation reaches one-half the designated sediment storage depth, usually one-half the height of the sediment control log. Move sediment to a location where it cannot wash back into any ditches, drainages, or other receiving waters.</p> <p>Retrench any barrier that has been undercut. Fill in and tamp down any gullies that have formed.</p>
Stormwater Detention Pond	<p>Inspect geomembrane liner regularly for any tears, cuts or other damage. Repair as soon as possible.</p> <p>Remove sediment accumulations whenever the pond is dry. The removed sediment should be handled and disposed of as if it were contaminated material from a spill cleanup.</p>

### 8.3 Spill Prevention and Response Procedures

See Table 1 for a list of industrial activities/pollutant sources that are controlled by spill prevention and response procedures. Spill prevention and response procedures that have been implemented at the Coyote Gulch GTP are described below and in Table 2.

Spill prevention and response for oil and oil related liquids stored at Coyote Gulch GTP is conducted in accordance with the Spill Prevention Control and Countermeasure (SPCC) plan prepared for the facility. Spill prevention and response for non-oil related liquids and solids follows similar procedures as outlined in the SPCC plan.

Leak detection on the plant site is ensured by daily visual patrolling of areas with storage containers, secondary containments, above ground piping, and processing vessels. The plant provides spill contingency planning and/or secondary containment for all chemical and petroleum liquid releases should they occur at the storage areas. Many of the processing areas have curbing for containment of spills or leaks. Removal of accumulated liquids from secondary containments is accomplished by use of absorbents, portable pumps, or other techniques.

The principal objectives in response to a spill event are:

1. Stop the source of spill or leak,
2. Contain the spill or leak, and
3. Commence remedial action.

The general procedure for spill or release emergency response is as follows:

1. Report the spill event to the Plant Operations Supervisor or their designee, Red Cedar Director of Environmental, Health & Safety, and the Growth Fund Safety & Environmental Compliance Management Group (SECMG).
2. The Red Cedar Director of Environmental, Health & Safety, in consultation with SECMG, will determine if and which outside assistance organizations are to be contacted, how the leak should be stopped and contained, and the form of remedial action necessary, and then initiate necessary action.
3. The Red Cedar Director of Environmental, Health & Safety, in consultation with SECMG, will notify the appropriate regulatory agencies as per the Exploration & Production Operator's Compliance Manual for Energy Development Projects on the Southern Ute Indian Reservation. Notifications will be made to the Southern Ute Indian Tribe Department of Energy (970-563-5550), the U.S.D.I. Bureau of Indian Affairs – Southern Ute Agency (970-563-4511), and potentially the National Response Center (800-424-8802) if a spill above a reportable quantity occurred or the spill reached Waters of the U.S.
4. If the event involves petroleum or petroleum-related product, procedures for notification and reporting will be followed as provided in the facility's SPCC plan.

Equipment is made available on site for spill response. The plant maintains shovels, goggles, absorbents, rubber boots, and coveralls. A drum overpack is also available on site for spill response use.

## 8.4 Erosion and Sediment Control

Polymers and/or other chemical treatments are not used for erosion and sediment control at the Coyote Gulch GTP.

## 8.5 Employee Training

Employee training will be conducted *annually*. All employees who work at the facility as well as those individuals who are responsible for implementing activities necessary to meet the conditions of the permit (e.g., inspectors, maintenance personnel), including the members of the Pollution Prevention Team will attend training. Topics to be covered include the following:

- An overview of what is in the SW3P;
- Specific control measures used at the facility to meet the conditions of the 2015 MSGP such as:
  - Minimizing Exposure
  - Good Housekeeping
  - Maintenance
  - Spill Prevention and Response
  - Erosion and Sediment Controls
  - Management of Runoff
- The location of all controls on the site required by this permit, and how they are to be maintained;
- The proper procedures to follow with respect to the permit's pollution prevention requirements;
- Monitoring, inspection, planning, reporting and documentation requirements of the permit; and material management practices.

Spill prevention and response will also be covered during SPCC training. Documentation of training will be maintained with the SW3P.

## 9 SCHEDULES AND PROCEDURES FOR INSPECTIONS AND ASSESSMENTS

### 9.1 Routine Facility Inspections

Inspectors will review monitoring data (visual and analytical) collected over the past year and consider these results when planning and conducting the inspections. In addition, inspectors will observe stormwater control measures to ensure they are functioning correctly.

#### 9.1.1 Monthly Inspections

- ◆ Person(s) or positions of person(s) responsible for inspection: Facility PSM Coordinator
- ◆ Schedules for conducting inspections: Monthly  
At least one of the routine inspections will be conducted during a period when a stormwater runoff is occurring.

Areas at the Coyote Gulch GTP that will be inspected each month include the following:

1. Storage tanks, vessels, and containers (for all products) and associated appurtenances including any visible leaks or drips from tank seams, valves, gaskets, rivets, and bolts;
2. Dikes, berms, curbing, and other secondary containment for controlling spills;
3. Aboveground pipes and appurtenances including any visible leaks or drips from pipes or pipe fittings;
4. Pumps including any visible leaks or drips from pumps, pump fittings or hoses;
5. Valves and fittings including any visible leaks or drips;
6. Ground surface (container storage areas, filling, and dispensing/unloading areas) for spills;
7. Accumulation of liquids in secondary containments;
8. Portable containers (55 gallons or greater)/secondary containment;
9. Storage tank, vessel, and container labeling;
10. Spill response equipment and supplies;
11. Areas where spills and leaks have occurred in the past three years;
12. Offsite tracking of industrial or waste materials or sediments where vehicles enter and exit the site;
13. Stormwater detention pond outfall, Outfall No. 001;
14. Entire site for evidence of industrial materials, residue or trash on the ground;
15. Tracking or blowing of waste materials to areas that are exposed to stormwater runoff.

#### 9.1.2 *Erosion and Sediment Controls Inspection*

- ◆ **Person(s) or positions of person(s) responsible for inspection: Facility PSM Coordinator and/or EHS Director**
- ◆ **Schedules for conducting inspections: Quarterly  
At least one of the routine inspections will be conducted during a period when a stormwater discharge is occurring.**

Inspections of existing structural BMPs (perimeter berms, stormwater detention pond, check dams, bar ditches, swales, south channel, rock-armored slope, rock inlet and outlet protection, etc.) will be conducted on a quarterly basis.

#### 9.1.3 *Inspection Reports*

The report on the routine facility inspection will contain the following information:

- The inspection date and time;
- The name(s) and signature(s) of the inspectors;
- Weather information

- All observations relating to the implementation of control measures at the facility, including:
  - A description of any discharges occurring at the time of the inspection;
  - Any previously unidentified discharges of pollutants from the site;
  - Any evidence of, or the potential for, pollutants entering the drainage system;
  - Observations regarding the physical condition of and around the outfall, including any flow dissipation devices, and evidence of pollutants in discharges and/or the receiving water
  - Any control measures that need maintenance, repair or replacement;
- Any incidents of noncompliance; and
- Any additional control measures needed to comply with the permit requirements;
- A statement, signed and certified in accordance with Appendix B, Subsection 11 of the 2015 MSGP.

Examples of the inspection reports are provided in Appendix G.

Monthly and quarterly routine facility inspection reports (January 2010 to the present) are kept in a file named SPCC in the Plant Clerk's filing cabinet in the drawer marked Office.

Any corrective action required as a result of these routine inspections, (i.e., a required BMP was never installed, was installed incorrectly or not in accordance with Parts 2 and/or 8 of the 2015 MSGP, or is not properly operated or maintained) must be performed consistent with Part 4 of the 2015 MSGP. See also Section 11 of this SW3P for more information on corrective action procedures.

## 9.2 Quarterly Visual Assessment

- ◆ Person(s) or positions of person(s) responsible for assessment: **Plant Operator and/or Facility PSM Coordinator**
- ◆ Location of sample collection: **Outfall No. 001**
- ◆ Schedule for conducting assessment: The tentative schedule for collecting samples is once each quarter and is provided in Table 4. At least one quarterly visual assessment will capture snowmelt discharge.

If no storm event resulted in runoff during the monitoring quarter, a **substitute sample** must be collected during the next discharge event. **If no visual assessment took place during a quarter, documentation of the rationale for no visual assessment for the quarter must be prepared.** A form for the documentation of the rationale for no visual assessment is provided in Appendix H.

Each sample collected will be assessed for the water quality parameters provided in Table 4. In addition, the samples will be tested for oil and grease and pH as an additional BMP. Testing for oil will be via visual examination to determine if there is a sheen on the water. If there is a sheen, the sample will be tested for oil and grease concentrations.

<b>TABLE 4 Quarterly Visual Assessments of Stormwater Discharges</b>				
<i>Industrial Subsector</i>	<i>SIC Code</i>	<i>Visual Assessment</i>		
		<i>Parameter</i>	<i>Limit</i>	<i>Frequency and Periods</i>
11	1311 – Crude Petroleum and Natural Gas  1389 Oil and Gas Field Services	Color; Odor; Clarity; Floating Solids; Settled Solids; Suspended Solids; Foam; Oil Sheen; Other obvious indicators of stormwater pollution	Record the results of the visual assessment of each sample for the water quality characteristics shown in the column to the left.	<u>Frequency</u> : at least once in each of the following three month periods at each stormwater outfall.  January 1- March 31; April 1- June 30; July 1 – September 30; October 1 – December 31.  <u>Period</u> : Every year of permit.

A quarterly visual assessment reporting form and instructions on collecting and analyzing the samples are provided in Appendix H. Quarterly visual assessment reports are maintained onsite in drawer 4 of file cabinet C in the PSM office. Visual assessment reports are retained with the SW3P and are not submitted unless requested by EPA.

Whenever the visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam), corrective action procedures will be initiated as described in Section 11 of this SW3P. Any corrective action required as a result of any observed stormwater contamination during the quarterly visual assessment, (i.e., maintenance or repair to control measure(s), replacement of control measure(s), implementation of additional control measures, measures taken to address an incident of noncompliance, etc.) must be performed consistent with Part 4 of the 2015 MSGP and Section 11 of this SW3P.

### 9.2.1 *General Instructions for the Quarterly Visual Assessment* Collection of Samples

Visual examination will be made on samples collected within the first 30 minutes of when the runoff or snowmelt from a storm event begins to discharge from the stormwater detention pond at Outfall No. 001. Samples will be collected from the discharge resulting from a storm event that meets the following criteria:

- Storm event that results in an actual discharge from the site (“measurable storm event”).
- Storm event resulting in a discharge from the pond occurs at least 72 hours since the last storm event that resulted in a discharge from the pond. The 72 hour storm interval does not apply if it is documented that less than a 72 hour interval is representative for local storm events during the sampling period.



For snow melt, samples will be collected during a period of measurable discharge from the stormwater detention pond at Outfall No. 001.

A minimum of one grab sample will be taken at the outfall. The sample will be collected during the first 30 minutes of the discharge. If it is not possible to collect the samples within the first 30 minutes of discharge, the sample will be collected as soon as practicable after the first 30 minutes. It will be documented on the Visual Assessment Report why it was not possible to collect samples within the first 30 minutes.

#### Storm Event Data

The following information will be maintained for each storm event that generated the stormwater runoff that is sampled:

- The date and duration in hours of the storm event;
- Rainfall total inches for that storm event;
- The time in days since the previous measurable storm event.
- For snow melt, monitoring is performed at a time when a measurable discharge occurs at the site.

#### *9.2.2 Substantially Identical Outfalls*

There are no substantially identical outfalls at the Coyote Gulch GTP. This part is not applicable.

#### *9.2.3 Adverse Climatic Conditions Waiver Adverse Climatic Conditions Waiver*

The 2015 MSGP allows for temporary waivers from monitoring based on adverse climatic conditions. Adverse conditions, those that are dangerous or create inaccessibility for personnel, may include:

- local flooding,
- high winds,
- electrical storms, or
- situations which otherwise make sampling impracticable such as drought or extended frozen conditions.

If samples cannot be collected within a specified quarter due to adverse weather conditions, a substitute sample must be taken during the next qualifying discharge event. Documentation of the rationale for no visual assessment for the quarter must be prepared. A form for the documentation of the rationale for no visual assessment is provided in Appendix J.

## **10 SCHEDULES AND PROCEDURES FOR MONITORING**

### **10.1 Benchmark Monitoring**

Benchmark monitoring is not required for Sector I facilities.

## 10.2 Compliance Monitoring for Discharges Subject to Numerical Effluent Limitation Guidelines

There are no discharges from the Coyote Gulch GTP that are subject to numerical effluent limitation guidelines.

## 10.3 Compliance Monitoring for Discharges Subject to State- or Tribal-Specific Monitoring

There are no state- or tribal-monitoring requirements for this facility.

## 10.4 Compliance Monitoring for Discharges to Water-Quality Impaired Waters

The Coyote Gulch GTP does not discharge to a water that has been identified as not meeting an applicable water quality standard.

## 10.5 Additional Monitoring Required by EPA.

### 10.5.1 *Special Monitoring Requirements for the Stormwater Detention Pond*

Stormwater is allowed to discharge from stormwater detention pond without any restriction<sup>3</sup>

EXCEPT when one of the following conditions has occurred:

1. A spill at the facility has flowed into the pond, OR
2. Stormwater runoff or snowmelt that has been contaminated by flowing over an area where a spill has not been cleaned up (due to winter conditions, safety concerns, or some other reason) flows into the pond

NOTE: If any area that has been contaminated by a spill that takes place between pond discharges is cleaned up prior to the next rain or snow melt event, then the pond can discharge without restriction. Therefore, it is advantageous to cleanup spills quickly and prior to the next rain or snow melt event.

If either Condition 1 or 2 have occurred since the last discharge from the pond, the pond is **not** allowed to discharge until the actions described below are completed.

- A sample from the pond must be collected and tested for contaminants associated with the spill. For sampling procedures, refer to Appendix M. In the event of an oil spill, the sample will need to be tested for oil and grease even if the oil floating on the surface had been removed from the surface.
- A determination is made by RCGC EHS staff (SECMG is also available to assist) based on the results of the analyses as to whether the pond can discharge. Depending on the results of the analyses, EPA may need to be contacted for consultation.

Since it takes time to obtain the test results, it will be important to sample well in advance of the water level in the pond reaching the elevation of outfall. If a determination is made based on the

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<sup>3</sup> Visual examination of a sample of the pond discharge as well as the testing of the pond discharge for pH and oil and grease will be conducted as described in Section 9.2 of the stormwater pollution prevention plan whenever there is a discharge from the pond.

test results that contaminant concentrations are too high, then the pond will need to be pumped down enough so that it will not discharge. If contaminant concentrations are non-detectable or determined to be below levels of concern, then the pond will be allowed to discharge without additional action as long as no new contaminated stormwater or snow melt flows into the pond between the time of the sampling and the discharge from the pond.

#### *10.5.2 Special Monitoring Requirements for Sediment Accumulations in the Stormwater Detention Pond*

Sediment accumulations in the stormwater detention pond must be removed whenever the pond is dry. The removed sediment is to be handled and disposed of as if it were contaminated material from a spill cleanup even if no contaminated stormwater discharged into the pond since the last time the sediment was removed. The removed sediments should be managed and disposed of as per the Southern Ute Growth Fund's Waste Management Procedures manual.

Special care must be taken when removing the sediment accumulations so that the liner is not damaged, e.g., cut, torn or punctured. Due to the liner's slick surface and the pond's sloped walls, a safe means for entering and exiting the pond will need to be implemented. The process for moving the containerized sediment from the pond to the plant where it can be stored until properly disposed of also need to be considered.

## **11 CORRECTIVE ACTION**

### **11.1 Conditions Triggering Corrective Action**

If any of the following conditions occur or are detected during an inspection, visual assessment, or other means, or EPA notifies the plant that one of the following conditions have occurred, the need to implement corrective action is required:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit to a water of the U.S.) occurs at the plant.
- Control measures are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits in this permit.
- A required control measure (see Table 2 for control measures implemented to meet the effluent limits of the 2015 MSGP) was never installed, was installed incorrectly, or not in accordance with Parts 2 and/or 8 of the 2015 MSGP, or is not being properly operated or maintained. Table 2 describes the control measures implemented at Coyote Gulch GTP to meet the effluent limits of the 2015 MSGP.
- Whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, and foam).

Within 24 hours of becoming aware of one of the conditions listed above, the SW3P must be reviewed to determine if modifications are necessary to meet the effluent limits of 2015 MSGP. One or more of the following will need to be reviewed:

1. sources of pollution;
2. spill and leak procedures;

3. non-stormwater discharges;
4. the selection, design, installation and implementation of the control measures

Based on the review, the SW3P will be revised so that this permit's effluent limits are met and pollutant discharges are minimized

If the following condition occurs, the SW3P will be reviewed (e.g., sources of pollution, spill and leak procedures, non-stormwater discharges, selection, design, installation and implementation of the control measures) to determine if modifications are necessary to meet the effluent limits in the 2015 MSGP:

- Construction or a change in design, operation, or maintenance at the facility that significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged.

### 11.2 Corrective Action Procedures

If any one of the conditions listed in Section 11.1 of this SW3P or in Parts 4.1 or 4.2 of the 2015 MSGP occur, corrective action is needed and all reasonable steps must be immediately taken to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events. It is also necessary to document the existence of the condition and subsequent actions to correct the condition as described in Section 11.3 below.

The term "immediately" requires that all reasonable steps are taken on the same day a condition requiring corrective action is found to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational. However, if a problem is identified at a time in the work day when it is too late to initiate corrective action, the initiation of corrective action must begin no later than the following work day.

"All reasonable steps" means that initial actions to assess and address the condition causing the corrective action is undertaken, including, for example, cleaning up any exposed materials that may be discharged in a storm event (e.g., through sweeping, vacuuming) or making arrangements (i.e., scheduling) for a new BMP to be installed at a later date. "All reasonable steps" for purposes of complying with Part 4.2 Conditions Requiring SWPPP Review to Determine if Modifications Are Necessary, when you conclude a corrective action is, in fact, not necessary, could include documenting why a corrective action is unnecessary.

### 11.3 Corrective Action Documentation

A corrective action report must be completed for each corrective action required. The report form is provided in Appendix I of this SW3P.

Within 24 hours of becoming aware of one of the triggering conditions listed in Section 11.1 above, questions 1-5 of the Corrective Action Form must be completed. Within 14 days of the inspection, questions 6-9 should be completed. Any modifications to control measures must be made before the next storm event if possible, or as soon as practicable following that storm event.

Corrective actions are summarized in the annual report. Copies of the corrective action reports will be retained onsite with the SW3P in Appendix I.

## **12 REPORTING AND RECORDKEEPING**

### **12.1 Annual Report**

An Annual Report will be submitted to EPA electronically, per Part 7.2 of the 2015 MSGP, by January 30th for each year of permit coverage containing information generated from the past calendar year. The following information will be provided in the report:

1. A summary of the past year's routine facility inspection documentation required (2015 MSGP Part 3.1.2).
2. A summary of the past year's quarterly visual assessment documentation (2015 MSGP Part 3.2.2);
3. A summary of the past year's corrective action documentation (2015 MSGP Part 4.4). If corrective action is not yet completed at the time of submission of the annual report, a description of the status of any outstanding corrective action(s) will be provided. In addition, any incidents of noncompliance in the past year or currently ongoing will also be provided. If there were none, a statement will be provided indicating that the facility is in compliance with the 2015 MSGP.

The NPDES eReporting Tool, or "NeT", will be used to prepare and submit the Annual Report. Copies of the annual report will be kept with the SW3P in Appendix J.

### **12.2 Recordkeeping**

The following documents must be retained for a period of at least three years from the date that the facility's coverage under the 2015 MSGP expires or is terminated:

- Copies of the SW3Ps including any modifications made during the term of the 2015 MSGP;
- Additional documentation required by Part 5.5 of the 2015 MSGP (including documentation related to corrective actions taken pursuant to Part 4 of the 2015 MSGP);
- All reports and certifications required by the 2015 MSGP;
- Any monitoring data; and
- Records of all data used to complete the Notice of Intent to be covered by the permit.

## **13 DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS**

### **13.1 Documentation Regarding Endangered Species**

Documentation supporting the determination of permit eligibility is provided in Appendix K.

### **13.2 Documentation Regarding Historic Places**

Documentation of permit eligibility with regards to Historic Places is provided in Appendix K.

### **13.3 Documentation Regarding NEPA Review**

Discharges from industrial activities at the Coyote Gulch GTP are not subject to New Source Performance Standards. Therefore, documentation regarding NEPA review is not necessary.

## **14 SIGNATURE REQUIREMENTS**

The SW3P will be signed in accordance with Appendix B, Subsection 11 of the 2015 MSGP. The signed certification can be found in Section 1 of this SW3P.

## **15 REQUIRED SW3P MODIFICATIONS**

The SW3P will be modified whenever necessary to address any of the triggering conditions for corrective action in Part 4.1 of the permit and to ensure that they do not reoccur, or to reflect changes implemented when a review following the triggering conditions of Part 4.2 of the permit indicates changes to control measures are necessary to meet the effluent limits in the 2015 MSGP. An amendment will be prepared that describes the changes to the SW3P in accordance with the corrective action deadlines in Parts 4.3 and 4.4 of the 2015 MSGP. The amendment will be placed in Appendix B of the SW3P. Amendments will include a signed and dated certification in accordance with Appendix B, Subsection 11 of the permit.

## **16 SW3P AVAILABILITY**

A copy of the current SW3P required by the 2015 MSGP including a copy of the 2015 MSGP (either hard copy or electronic copy) will be retained *on site* at the facility from the date of permit coverage to the date permit coverage ceases. A copy of the SW3P must be immediately available to EPA, the State, Tribal, or local agency approving stormwater management plans or the USFWS or NMFS at the time of an onsite inspection or upon request.

To comply with the public availability requirements for the SW3P, a current copy of the SW3P will be maintained at the following URL: [www.redcedargathering.com/publicawareness](http://www.redcedargathering.com/publicawareness). Any SW3P modifications, records and other reporting elements required for the previous year will be posted at the URL indicated above. The SW3P update shall be posted no later than 45 days after conducting the final routine facility inspection for the year required in Part 3.1 of the 2015 MSGP.

## **17 COPY OF PERMIT REQUIREMENTS**

A copy of the 2015 MSGP is located in Appendix L.

## 18 ACRONYMS

BMP	Best Management Practices
BPT	Best Practicable Control Technology Currently Available
EPA	Environmental Protection Agency
SDS	Safety Data Sheet
MSGP	Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NOI	Notice of Intent
NOT	Notice of Termination
GF SECMG	Growth Fund Safety and Environmental Compliance Management Group
SIC	Standard Industrial Classification
SPCC	Spill Prevention, Control and Countermeasures
SUIT	Southern Ute Indian Tribe
SW3P	Stormwater Pollution Prevention Plan
TEG	Triethylene glycol
TMDL	Total Maximum Daily Load

## APPENDICES



**APPENDIX A**  
**NOI, NOT, AND OTHER EPA CORRESPONDENCE**

**APPENDIX B**  
**SW3P AMENDMENTS**

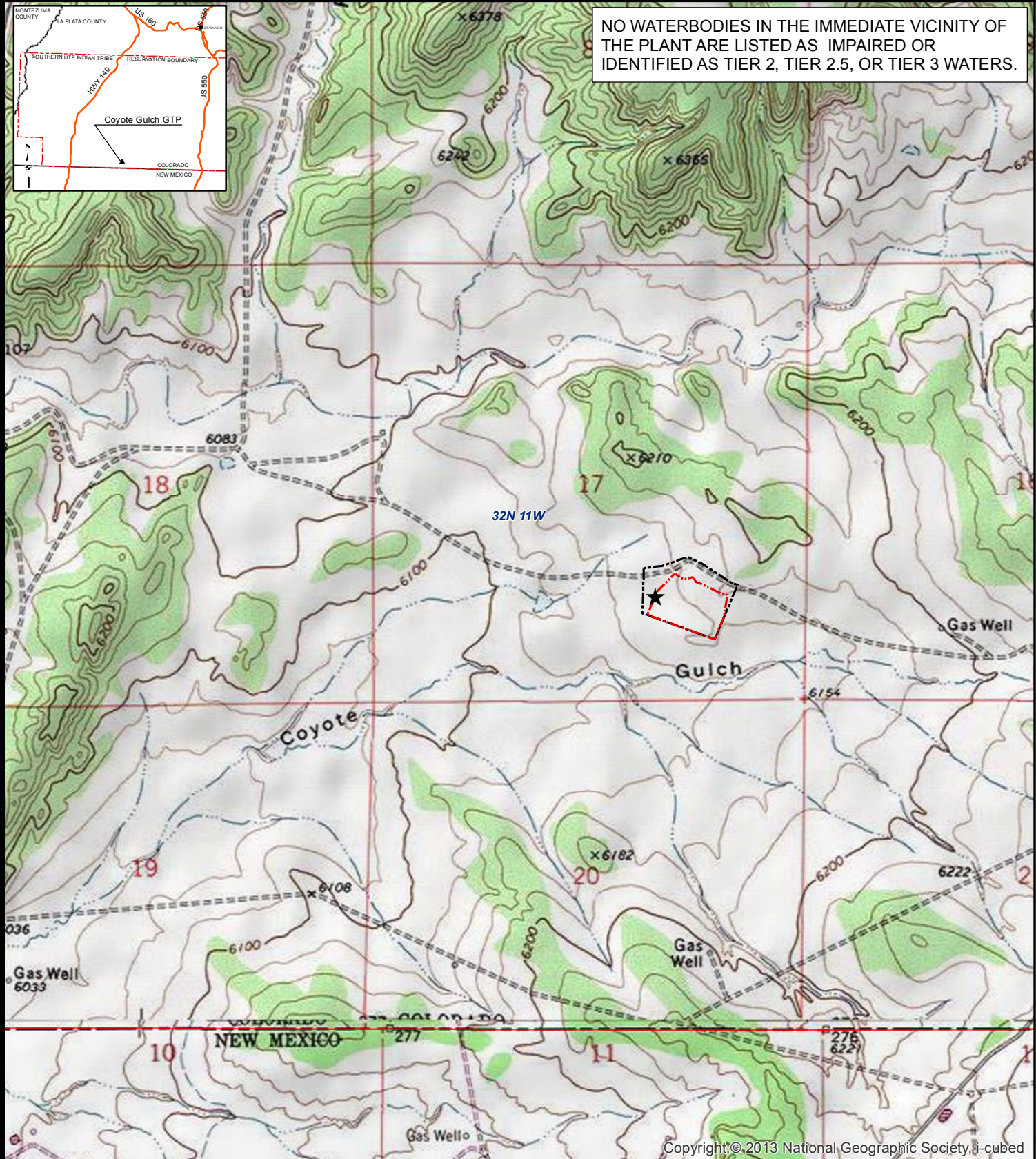
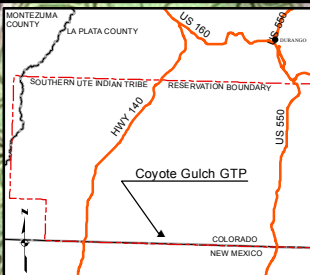
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COYOTE GULCH GAS TREATING PLAT  
STORMWATER POLLUTION PREVENTION PLAN**

**AMENDMENT LOG**

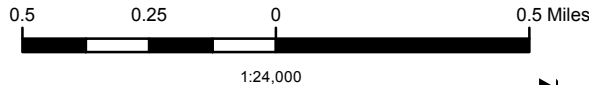
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1			
2			
3			
4			
5			
6			
7			
8			

**APPENDIX C  
SITE MAPS**

NO WATERBODIES IN THE IMMEDIATE VICINITY OF THE PLANT ARE LISTED AS IMPAIRED OR IDENTIFIED AS TIER 2, TIER 2.5, OR TIER 3 WATERS.



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**LEGEND**

- - - - - INDUSTRIAL ACTIVITY/PERMIT AREA
- - - - - LEASE BOUNDARY
- ★ OUTFALL NO. 001

Prepared By: SECMG-NK  
 Date: 8/05/2015  
 Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere  
 Projection: Mercator Auxiliary Sphere  
 Datum: WGS 1984





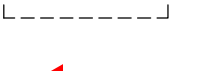



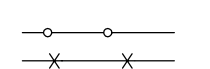
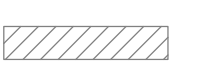
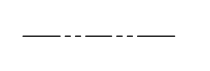
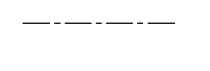



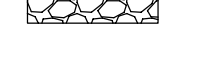



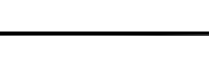
**COYOTE GULCH GAS TREATING PLANT**

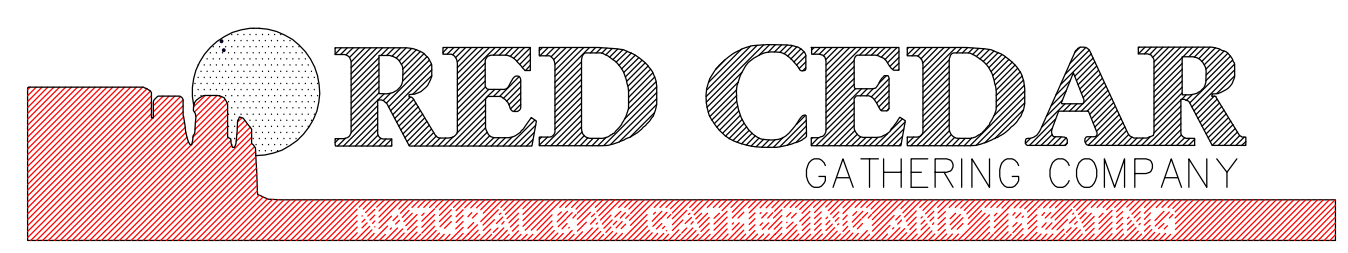
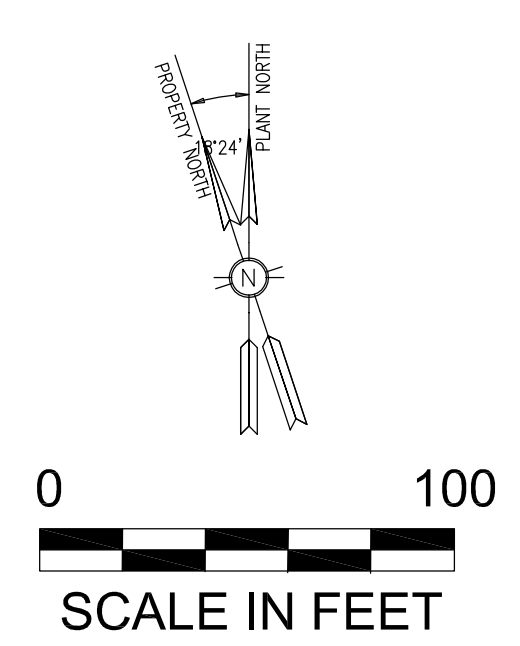
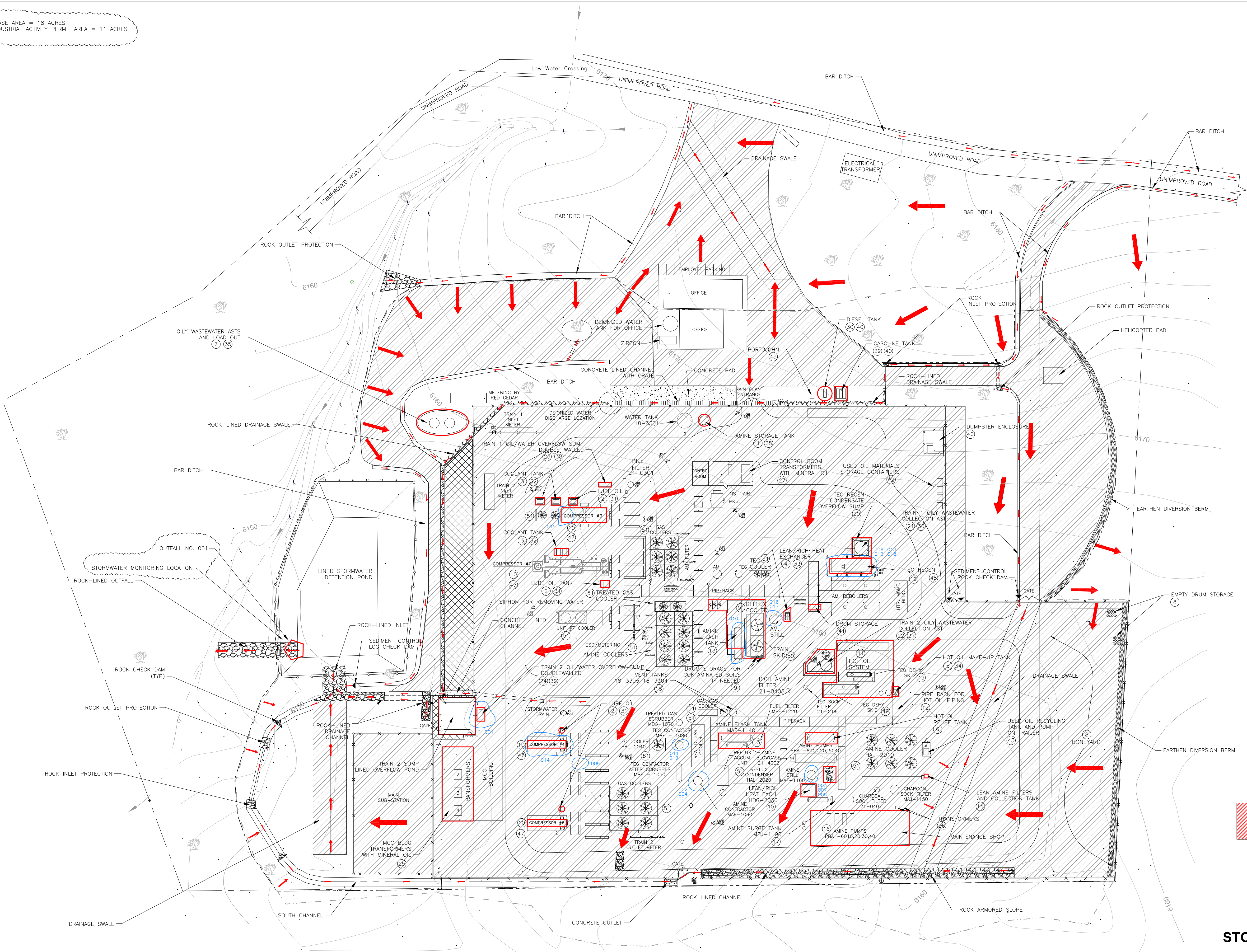
Southern Ute Indian Reservation  
 SE/4 Section 17, T32N, R11W N.M.P.M.  
 La Plata County, Colorado

**FIGURE 1 LOCATION MAP**

LEASE AREA = 18 ACRES  
INDUSTRIAL ACTIVITY PERMIT AREA = 11 ACRES

**LEGEND**

-  CHECK DAM
-  CONCRETE
-  CULVERT
-  DIRECTION OF FLOW
-  DRAINAGE
-  DRAINAGE BOUNDARY
-  EARTHEN BERM
-  FENCE
-  GRAVEL SURFACE
-  INDUSTRIAL ACTIVITY / PERMIT AREA
-  LEASE BOUNDARY
-  NATURAL VEGETATION
-  POTENTIAL POLLUTANT SOURCE IDENTIFICATION NUMBER (REF. TABLE 1)
-  ROCK
-  SECONDARY CONTAINMENT/CURBING
-  SIGNIFICANT SPILL LOCATION
-  STORMWATER OUTFALL
-  TURF REINFORCEMENT MAT



**Coyote Gulch Gas Treating Plant**

Southern Ute Indian Reservation  
La Plata County, Colorado

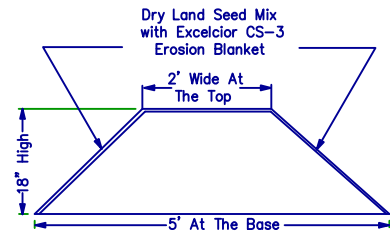
**STORMWATER POLLUTION PREVENTION PLAN**

**FIGURE 2 - SITE MAP**

PREPARED BY: GF SECMG  
DATE: AUGUST 11, 2015  
REVISION: ADDED NOTES

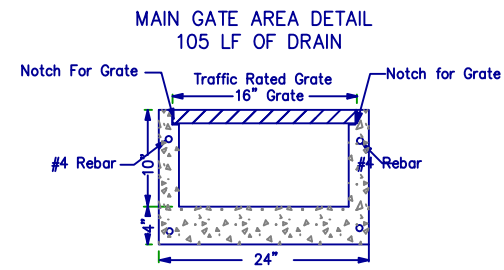


DETAIL (A)



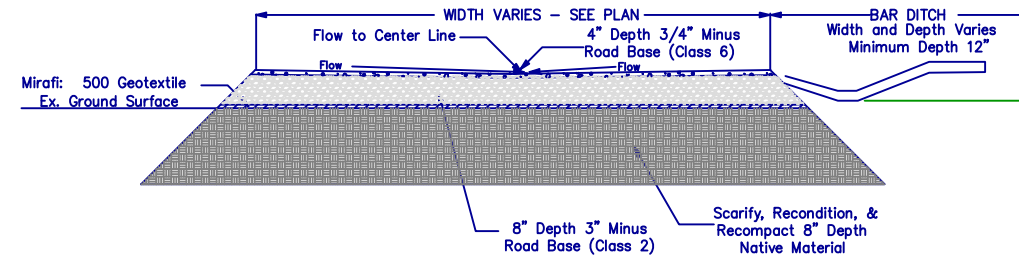
BERM DETAIL  
Not To Scale

DETAIL (B)



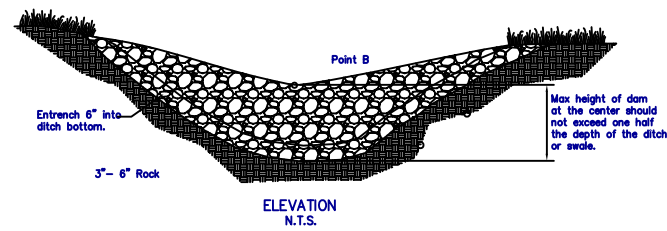
CONCRETE DRAIN DETAIL  
Not To Scale

DETAIL (C)

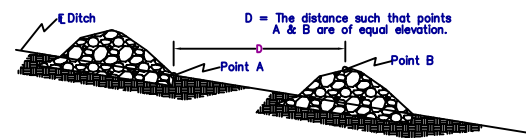


EXISTING ROADWAY REINFORCEMENT/  
BAR DITCH DETAIL  
Not To Scale

DETAIL (D)

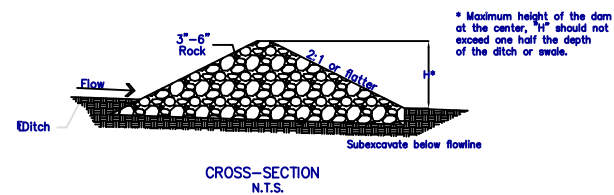


ELEVATION  
N.T.S.



SPACING BETWEEN CHECK DAMS  
N.T.S.

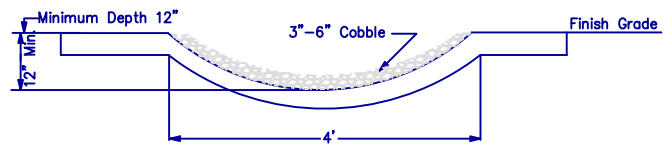
NOTE  
Distance between check dams (D) can be calculated by the following formula:  
 $D = 100 \times \text{Height of Dam at Point B} / \text{Slope of Channel in percent}$



CROSS-SECTION  
N.T.S.

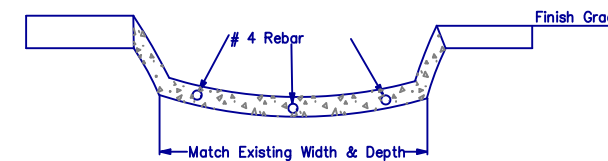
ROCK CHECK DAM DETAIL  
Not To Scale

DETAIL (E)



SWALE DETAIL  
W/3"-6" Cobble  
Not To Scale

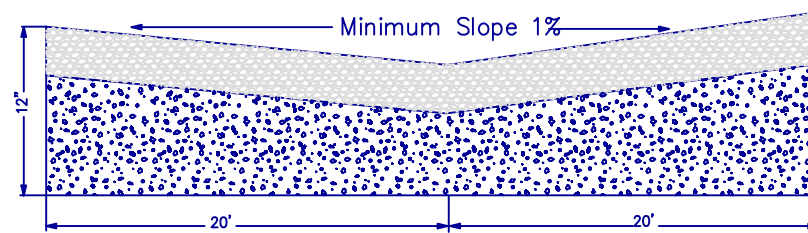
DETAIL (F)



CONCRETE SWALE - WESTSIDE  
Not To Scale

DETAIL (L)

Scarify to 12" Depth  
Using Existing Road Material  
to Reshape



CUT OUT DETAIL  
Not To Scale

BUCKEYE  
DESIGN  
GROUP

COYOTE GULCH GAS TREATING PLANT  
Red Cedar Gathering Company

11-JUNE-2010

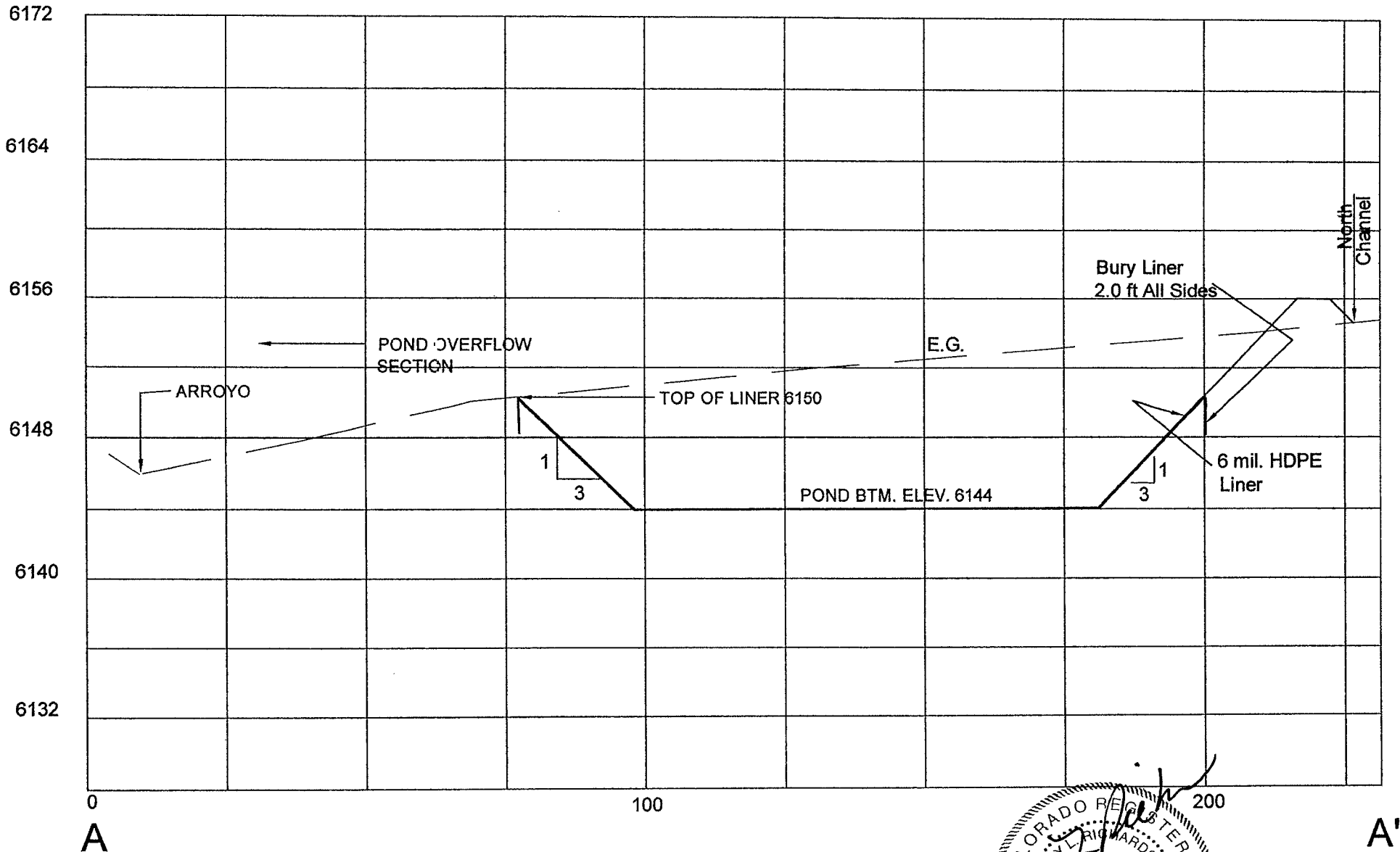
REVISIONS

28-MAY-2010

02-JUNE-2010

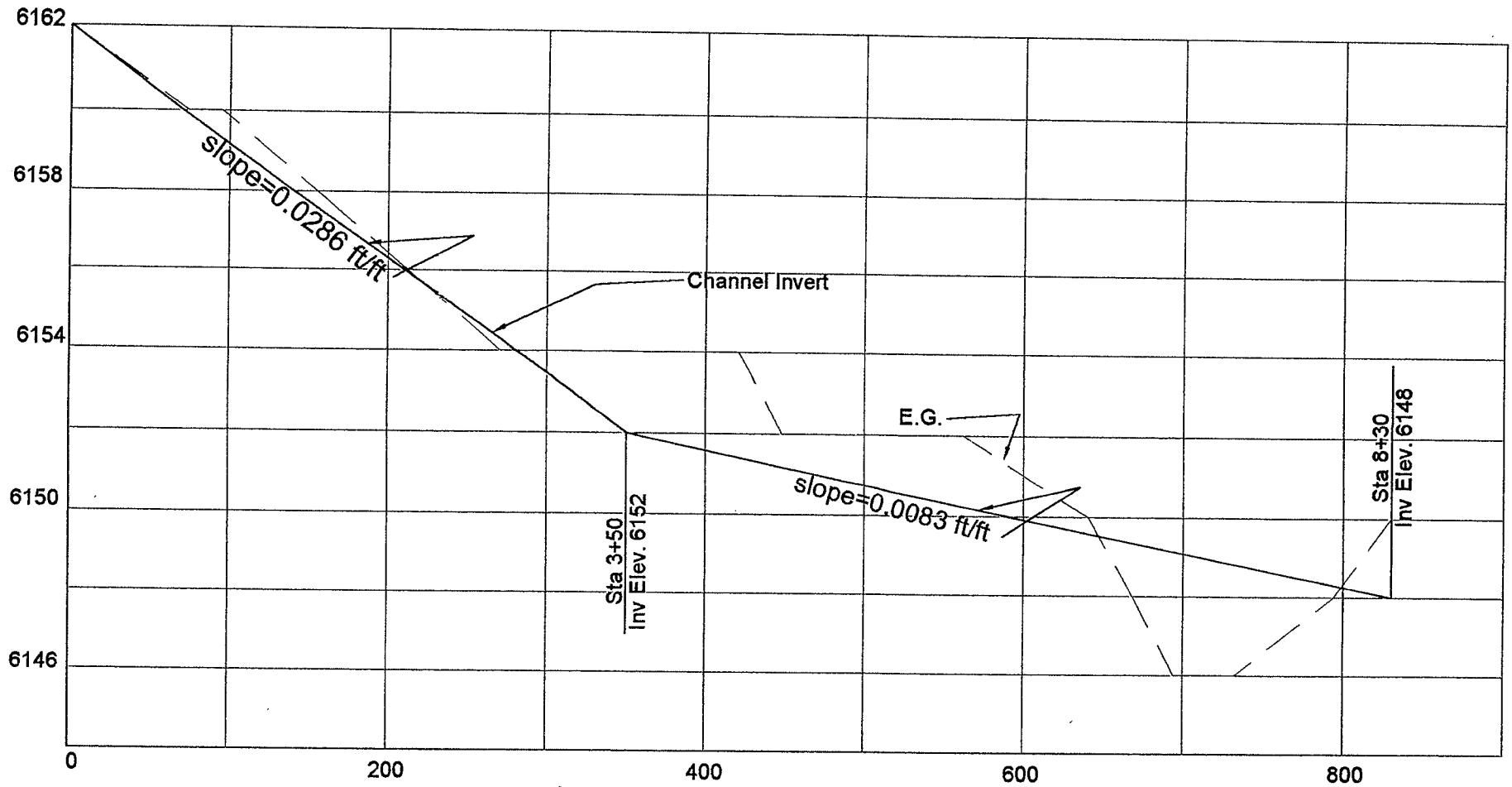
SHEET  
C-2





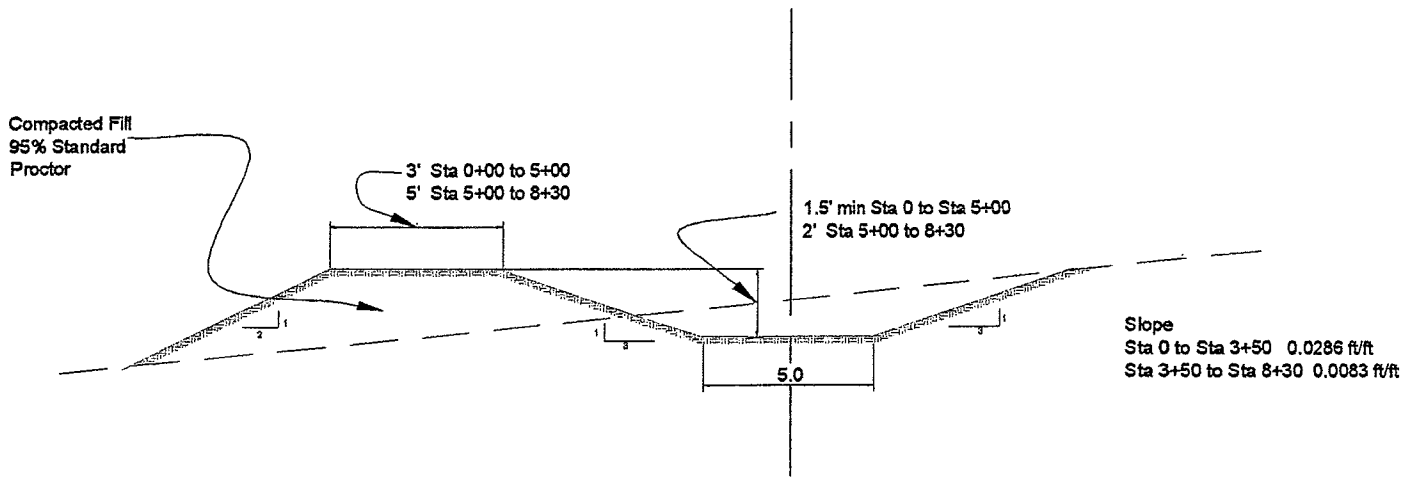
DRAWING 2  
 POND  
 CROSS SECTION





Drawing 3  
 Profile  
 South Channel





LOOKING DOWNSTREAM



Drawing 4  
 Typical Section  
 South Channel



**TABLE 1**

**POND STAGE-STORAGE  
COYOTE GULCH GAS TREATING PLANT**

<b>Elevation</b>	<b>Area (in<sup>2</sup>)</b>	<b>Area (Ac)</b>	<b>Volume (Ac-Ft)</b>	<b>Accumulative volume (Ac-Ft)</b>
6144	1.08	0.248		0
			0.53	
6146	1.29	0.285		0.53
			0.65	
6148	1.60	0.367		1.18
			0.79	
6150	1.86	0.427		<b>1.97</b>

TABLE 2

SOUTH CHANNEL HYDRAULICS  
COYOTE GULCH GAS TREATING PLANT

---

Q = 14.98 CFS  
n = 0.030  
b = 5'  
Z = 3:1

Sta 0 + 00 to 3 + 50  
S = 0.0286 ft/ft  
d = 0.50 ft  
Tw = 8.03 ft  
V = 4.57 fps

Sta 3 + 50 to 8 + 30  
S = 0.0083 ft/ft  
d = 0.71 ft  
Tw = 5.42 ft  
V = 2.97 fps

---

TABLE 3

NORTH CHANNEL HYDRAULICS  
COYOTE GULCH GAS TREATING PLANT

---

Q = 7.91 CFS  
n = 0.030  
b = 5 ft  
Z = 3:1

Sta 0 + 00 to 1 + 00  
S = 0.02 ft/ft  
d = 0.39 ft  
Tw = 7.33 ft  
V = 3.30 fps

Sta 1 + 00 to 3 + 25  
S = 0.0178 ft/ft  
d = 0.40 ft  
Tw = 7.41 ft  
V = 3.17 fps

Sta 3 + 25 to 4 + 10                      Riprap  
S = 0.0706 ft/ft  
n = 0.035  
d = 0.30 ft  
Tw = 6.78 ft  
V = 4.53 fps  
d<sub>50</sub> = 6" Round rock  
Riprap thickness = 1.5 ft (no bedding)

---

EXHIBIT 1  
HYDROLOGY DATA SHEET

Red Cedar

Prediction Point      A (North Channel)

Date 7/7/03

Drainage Area	A=	3.86 acres
Runoff Curve Number	CN=	86
Watershed Length	L=	850 feet
Elevation Difference	d=	31 feet
Tc	Tc=	0.12 hours
cfs/ac/in		1.30 cfs/ac/in
(REFERANCE SCS 1973)		

2-year 24-hour rainfall	p2=	1.30 inches
2-year 24-hour direct runoff	q2=	0.36 inches
2-year 24-hour volume	V2=	0.12 ac-ft
2-year 24-hour discharge	Q2=	1.83 cfs

5-year 24-hour rainfall	p5=	1.70 inches
5-year 24-hour direct runoff	q5=	0.63 inches
5-year 24-hour volume	V5=	0.20 ac-ft
5-year 24-hour discharge	Q5=	3.16 cfs

10-year 24-hour rainfall	p10=	1.90 inches
10-year 24-hour direct runoff	q10=	0.77 inches
10-year 24-hour volume	V10=	0.25 ac-ft
10-year 24-hour discharge	Q10=	3.88 cfs

25-year 24-hour rainfall	p25=	2.40 inches
25-year 24-hour direct runoff	q25=	1.16 inches
25-year 24-hour volume	V25=	0.37 ac-ft
25-year 24-hour discharge	Q25=	5.83 cfs

50-year 24-hour rainfall	p50=	2.70 inches
50-year 24-hour direct runoff	q50=	1.41 inches
50-year 24-hour volume	V50=	0.45 ac-ft
50-year 24-hour discharge	Q50=	7.07 cfs

100-year 24-hour rainfall	p100=	2.90 inches
100-year 24-hour direct runoff	q100=	1.58 inches
100-year 24-hour volume	V100=	0.51 ac-ft
100-year 24-hour discharge	Q100=	7.91 cfs



EXHIBIT 2

HYDROLOGY DATA SHEET

Red Cedar

Prediction Point	B (South Channel)	Date 7/7/03
Drainage Area		A= 7.42 acres
Runoff Curve Number		CN= 86
Watershed Length		L= 1050 feet
Elevation Difference		d= 15 feet
Tc		Tc= 0.14 hours
cfs/ac/in		1.28 cfs/ac/in
(REFERANCE SCS 1973)		
2-year 24-hour rainfall		p2= 1.30 inches
2-year 24-hour direct runoff		q2= 0.36 inches
2-year 24-hour volume		V2= 0.23 ac-ft
2-year 24-hour discharge		Q2= 3.47 cfs
5-year 24-hour rainfall		p5= 1.70 inches
5-year 24-hour direct runoff		q5= 0.63 inches
5-year 24-hour volume		V5= 0.39 ac-ft
5-year 24-hour discharge		Q5= 5.98 cfs
10-year 24-hour rainfall		p10= 1.90 inches
10-year 24-hour direct runoff		q10= 0.77 inches
10-year 24-hour volume		V10= 0.48 ac-ft
10-year 24-hour discharge		Q10= 7.35 cfs
25-year 24-hour rainfall		p25= 2.40 inches
25-year 24-hour direct runoff		q25= 1.16 inches
25-year 24-hour volume		V25= 0.72 ac-ft
25-year 24-hour discharge		Q25= 11.04 cfs
50-year 24-hour rainfall		p50= 2.70 inches
50-year 24-hour direct runoff		q50= 1.41 inches
50-year 24-hour volume		V50= 0.87 ac-ft
50-year 24-hour discharge		Q50= 13.38 cfs
100-year 24-hour rainfall		p100= 2.90 inches
100-year 24-hour direct runoff		q100= 1.58 inches
100-year 24-hour volume		V100= 0.98 ac-ft
100-year 24-hour discharge		Q100= 14.98 cfs

EXHIBIT 3  
HYDROLOGY DATA SHEET

Red Cedar

Prediction Point	POND VOLUMES	Date 7/7/03
Drainage Area		A= 11.95 acres
Runoff Curve Number		CN= 86
Watershed Length		L= 0 feet
Elevation Difference		d= 0 feet
Tc		Tc= 0.00 hours
cfs/ac/in		0.00 cfs/ac/in
(REFERANCE SCS 1973)		
2-year 24-hour rainfall		p2= 1.30 inches
2-year 24-hour direct runoff		q2= 0.36 inches
2-year 24-hour volume		V2= 0.36 ac-ft
2-year 24-hour discharge		Q2= 0.00 cfs
5-year 24-hour rainfall		p5= 1.70 inches
5-year 24-hour direct runoff		q5= 0.63 inches
5-year 24-hour volume		V5= 0.63 ac-ft
5-year 24-hour discharge		Q5= 0.00 cfs
10-year 24-hour rainfall		p10= 1.90 inches
10-year 24-hour direct runoff		q10= 0.77 inches
10-year 24-hour volume		V10= 0.77 ac-ft
10-year 24-hour discharge		Q10= 0.00 cfs
25-year 24-hour rainfall		p25= 2.40 inches
25-year 24-hour direct runoff		q25= 1.16 inches
25-year 24-hour volume		V25= 1.16 ac-ft
25-year 24-hour discharge		Q25= 0.00 cfs
50-year 24-hour rainfall		p50= 2.70 inches
50-year 24-hour direct runoff		q50= 1.41 inches
50-year 24-hour volume		V50= 1.40 ac-ft
50-year 24-hour discharge		Q50= 0.00 cfs
100-year 24-hour rainfall		p100= 2.90 inches
100-year 24-hour direct runoff		q100= 1.58 inches
100-year 24-hour volume		V100= 1.57 ac-ft
100-year 24-hour discharge		Q100= 0.00 cfs

**APPENDIX D  
SIGNIFICANT LEAKS AND SPILLS**

## SIGNIFICANT SPILLS AND LEAKS

Date/ Completed By	Spill or Leak	Location ID (as indicated on site map)/ Equipment	Description				Response Procedure		Preventive Measures Taken
			Type of Material	Quantity (gallons)	Source if known	Cause of Spill or Leak	Actions Taken to Respond to the Release	Material No Longer Exposed to Storm Water (Yes/No)	
8/21/2002	Spill	<b>001</b> Train 2 oil/ water overflow sump)	Oil	See Spill Incident Report in Appendix D.					
11/1/2009 <sup>1</sup>	Leak	<b>002</b> T2 Contactor	Amine/DI water mix	30	4" outlet valve pinhole leak	Erosion due to velocity	See Spill Report	Yes	Replaced carbon steel valve with stainless steel valve.
12/2/2009	Spill	<b>003</b> T2 CO <sub>2</sub> Vent	Amine/DI water mix	1416	CO2 vent stack	Foaming in stripper tower	See Spill Report	Yes	Recommend installing DP indicator in inches of mercury instead of pounds
4/27/2010	Leak	<b>004</b> T2 Amine Contactor Tower	Amine/DI water mix	3	10x4 Reducer downstream LCV	Erosion due to velocity	See Spill Report	Yes	Replaced carbon steels reducer with stainless steel reducer.
5/1/2010	Leak	<b>005</b> T2 Amine Contactor Tower	Amine/DI water mix	10	HV3604 Valve pinhole leak	Erosion due to velocity	See Spill Report	Yes	Replaced carbon steel valve with stainless steel valve
5/25/2010	Spill	<b>006</b> T1 Dehy	TEG	15	Reboiler still vent	Amine carryover to dehy contactor/contamination	See Spill Report	Yes	Clean-up amine through filtration
7/13/2010	Leak	<b>007</b> T2 Still	Amine/DI water mix	4	T2 Still pinhole leak	Erosion due to rich amine impingement	See Spill Report	Yes	Installed temporary plug to stop leak until repair could be scheduled
9/30/2010	Leak	<b>008</b> T2 Still	Amine/DI water mix	5	T2 Still pinhole temp repair leaking	Temp repair started leaking, re-plug	See Spill Report	Yes	Scheduled repair and cut out area and installed new section of wall.

<sup>1</sup> Spill reports for the time period covering 2007 through 8/17/2009 were provided to EPA in 2010

## SIGNIFICANT SPILLS AND LEAKS

Date/ Completed By	Spill or Leak	Location ID (as indicated on site map)/ Equipment	Description				Response Procedure		Preventive Measures Taken
			Type of Material	Quantity (gallons)	Source if known	Cause of Spill or Leak	Actions Taken to Respond to the Release	Material No Longer Exposed to Storm Water (Yes/No)	
10/11/2010	Leak	<b>009</b> T1 Outlet Piping	Oil	1	2" equalizing line of outlet block valve	Crack on 2" equalizing line	Pig mats, absorbent socks, bucket to catch leak	Yes	Removed equalizing line and capped ends
12/31/2010	Spill	<b>010</b> T1 Flashtank / T1 Still tower	Amine / DI Water	40	Flash tank relief valve & CO2 Vent stack	Reflux cooler freeze, and flashtank relief valve	Pig mats, absorbent socks, thaw cooler out	Yes	Develop Winterization checklist
1/1/2011	Spill	<b>011</b> T2 Glycol cooler	Triethylene Glycol	20	Cooler	Overpressure cooler	Shut down pump, pig mats, absorbent socks, buckets	Yes	Write procedure for switching Dehys T1 to T2. Car seal relief valve; add pressure indication on pump discharge line.
2/25/2011	Spill	<b>012</b> T1 Dehy	TEG	2	Dehy filter	Filter housing still had pressure	See Spill Report	Yes	Ensure LOTO is followed
3/27/2011	Spill	<b>013</b> T1 Dehy	TEG/Amine/ DI Water	40	Dehy still vent	Amine Carryover into dehy contactor	See Spill Report	Yes	Clean up amine through filtration
7/14/2011	Leak	<b>014</b> EC #4	Oil	10	2 <sup>nd</sup> stage vent	Purge cycle	Pig mats, clean up & removed impacted soil	Yes	Reprogram vent valve to cycle open slower
4/23/2012	Spill	<b>015</b> EC #3	Coolant	15	Coolant surge tanks	Engine overheated due to cooling fans were not on	Pigmats cleanup impacted soil	Yes	Develop Pre startup checklist
12/01/2012	Spill	<b>016</b> T1 Still	Amine/DI water mix	30	CO2 Vent stack	High differential foaming	Pigmats, called contractor to cleanup impacted	Yes	Clean up amine through filtration to remove contamination

### SIGNIFICANT SPILLS AND LEAKS

Date/ Completed By	Spill or Leak	Location ID (as indicated on site map)/ Equipment	Description				Response Procedure		Preventive Measures Taken
			Type of Material	Quantity (gallons)	Source if known	Cause of Spill or Leak	Actions Taken to Respond to the Release	Material No Longer Exposed to Storm Water (Yes/No)	
							soil		
1/18/2013	Leak	<b>019</b> T2 Glycol cooler	Triethylene Glycol	20	Crack bulk head in cooler	Cooler isolated/out of service, relief protection isolated from cooler, potential over pressure/cold temperatures.	Drain cooler, clean up impacted soil	Yes	Add additional support for bulkhead/piping, signs to prevent isolating unit from relief valve; Add relief valve cooler side.
5/24/2013	Spill	<b>017</b> T1 CO <sub>2</sub> Vent	Amine/DI water mix	123	MMI/computer froze, flashtank overfilled	Carryover from flashgas out CO <sub>2</sub> vent stack	Pigmats, absorbent socks, cleanup to remove impacted soil	Yes	Re-route flash gas from the CO <sub>2</sub> vent to the amine recovery tank.
6/01/2013	Spill	<b>018</b> T1	TEG	10	T1 Dehy	Contactora differential pressure, amine contamination caused carryover from Amine contactora to dehy	Clean up impacted soil	Yes	Consider revising anti-foam to prevent contactora carryover

## Inter-Office Memo

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**DATE:** 26 AUG 02  
**TO:** Frank Tsuru  
**CC:** Matt Berghorn  
Dan Girodo  
**FROM:** Shawn Young  
**SUBJECT:** Coyote Gulch Train 2 Sump Overflow – 21 AUG 02 – Initial Report

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### ***Introduction***

On Wednesday, August 21, 2002, the sump for the containment drains on Train 2 at the Coyote Gulch Treating Plant overflowed. This was the result of extremely heavy rainfall for about 20 minutes early in the morning. The rainwater mixed with some oil in the containments and sump; the sump pump was unable to keep up with the inflow. This resulted in the mixture overflowing the sump containment and traveling off-site and down an arroyo to the west of the plant. The mixture proceeded down the arroyo and stopped about ½ mile west of the plant. The mixture stopped approximately 100 feet east of a retention pond.

The impact of the event on the local environment was limited to saturation with oil of soils in the arroyo and nearby areas. The total estimated volume of soil impacted by the incident is 30 yards<sup>3</sup>. A diagram of the spill area is attached as *Appendix A*.

### ***Reporting***

The spill was reported to Mike Hanak, Remediation Manager for Kinder-Morgan, since the facility is owned by Kinder-Morgan. The spill was reported to Fran King-Brown, Department Head of Environmental Programs for the Southern Ute Indian Tribe (SUIT), since the spill occurred on the Southern Ute Indian Reservation. The spill was also reported the U.S. EPA's National Response Center since it effected an arroyo.

The SUIT requested that the impacted soils be excavated and that an audit of the facility's Spill Prevention, Control, and Countermeasure Plan (SPCC) be conducted.

### ***Remediation***

Shawn Young, Environmental & Safety Manager; Steve Herrera, West Plants Operations Foreman; and Dan Girodo, West Plants Manager developed a Remediation Action Plan (*Appendix B*). Oil absorbent pads were placed in areas where the oil had pooled. Oil absorbent socks were placed at the terminus of the overflow streams. Once all free liquids had evaporated or been absorbed by the pads or soils, the impacted soils were excavated using hand shovels and a front-end loader.

Excavated soils were placed on a plastic-lined and bermed location at the facility until the soil can be profiled and permission to transport the soil to the Crouch Mesa Land Farm in Aztec, New Mexico is obtained.

### ***Investigation***

Cordilleran Compliance Services was contracted to audit the facility's SPCC. Dave Cloutier, Senior Project Manger with Cordilleran arrived at the facility on Thursday, August 22, 2002. Preliminary findings are as follows:

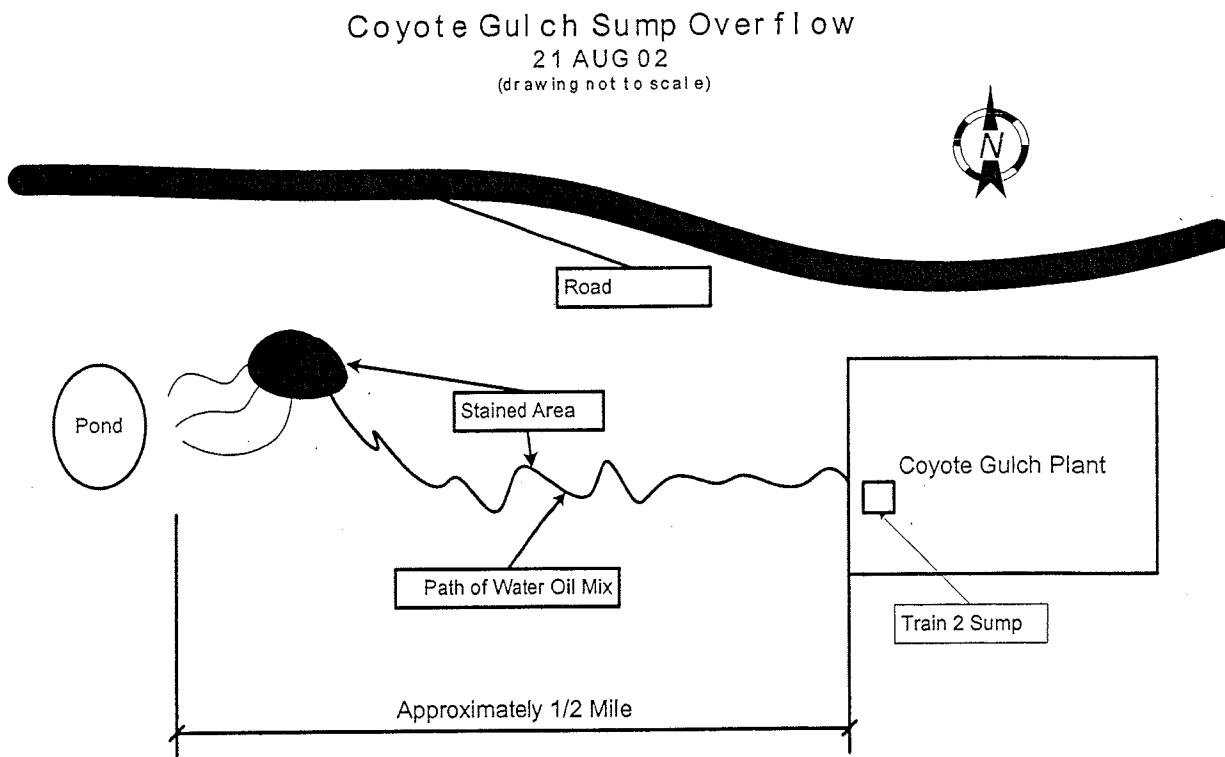
- The deluge may have been greater than a 100-year event. A 24 hour, 100-year event is the design criteria for an SPCC.
- The valve on the pipe leading from the containment drains to the sump were open which allowed a significant amount of rainfall to enter the sump from the containments.
- The pump on the sump did not have a sufficient flow rate to keep up with the inflow of water.

Cordilleran will be sending another associate to the site the week of September 16, 2002 to gather additional data to complete the revision of the SPCC.

The Remediation Action Plan was discussed with Cordilleran. They had no additional recommendations.



### Appendix A – Coyote Gulch Sump Overflow Diagram



**Appendix B: Remediation Action Plan**

## I. Background Data

## A. Location and extent of Spill

1. Coyote Gulch Treating Plant (Sec. 17 T32N R11W).
2. The spill starts at the Train 2 sump and extends down the arroyo to the west for approximately ½ mile.

## B. Date of Spill

1. 21 AUG 02

## C. Time of Spill

1. Early A.M.

## D. Substance spilled.

1. Mixture of Water and Oil

## E. Brief description of spill.

1. A major rainstorm caused an excessive amount of water to mix with oil in containments and in the containment drain sump. Consequently, the sump overflowed and the mixture traveled offsite to the west along the arroyo to a distance of approximately ½ mile west of the plant.

## F. Contributing Factors

1. A significant amount of rain fell within a small amount of time. Initial estimates based on meteorological data from a weather station in Durango indicate 0.16 inches of rain fell in 20 minutes. This equates to 11 ½ inches in 24 hours.
2. The rate of rainfall resulted in the flow rate from the containments exceeding the pump rate from the sump and the subsequent overflowing of the sump.
3. The rate of transfer of the pump is low due to the difference in elevation between the sump and the waste tank and the design of the pump.
4. The valves on the drainpipes from the concrete containments were open which allowed all of the rainwater falling on the area of the containment to enter the sump.

## II. Safety Considerations

## A. Other than ordinary hazards

1. Skin contact with oil.
2. Walking on uneven surfaces (rough terrain)
3. Walking on slippery surfaces (wet / oily ground)

- B. Safety Precautions
  - 1. Wear nitrile, latex, rubber or other glove impervious to liquids (II.A.1.)
  - 2. Plan each step and ensure that one foot is securely placed before taking the next step (II.A.2 and II.A.3)
- III. Actions to stop further environmental impact
  - A. Oil absorbent pads will be placed in locations where oil has accumulated.
  - B. Oil absorbent socks will be placed on each of the minor drainages on the westernmost extent of the spill.
- IV. Actions to mitigate environmental impact
  - A. Oil absorbent pads will be placed in locations where oil has accumulated.
  - B. All impacted (stained) soils will be excavated and stockpiled onsite until all excavation is completed.
  - C. The stockpile shall have a plastic liner and will be bermed to prevent leaching and runoff.
  - D. Samples of the excavated areas and the stockpile will be taken by the Environmental and Safety Manager to profile the stockpile and ensure that adequate cleanup was performed.
- V. Action to prevent future occurrence of similar event (all contributing factors should be addressed)
  - A. Cordilleran Compliance Services will conduct an audit of the SPCC. Any deficiencies found or recommendations made will be addressed.
  - B. The pump will be replaced on both train 1 and train 2 sumps with a model that has a higher rate of flow.
  - C. The drainpipe valves on the large concrete containments will normally be kept closed. The containments had sufficient freeboard to handle this storm event. If any accumulation occurs in the containment, the valves will be opened in a manner that does not overflow the sump.

## SPILL INCIDENT REPORT

Date of Spill: 4/28/2003	Time of Spill: 3:30 PM
Date of Report: 4/29/2003	Time of Report: 4:05 PM
Reported By: Dan Girodo	Title of Reporting Party: Antler / Coyote Plant Manager
Name(s) of Chemical(s) Spilled: DOW Chemical Amine AP-814, DI Water, and small amount of oil mix	
Estimated Quantity of Chemical(s) Spilled (indicate units): DOW AP-814 (Amine) 520 gallons, DI Water 680 gallons, Approximately 5gal. oil	
Name of Facility: Coyote Gulch	Location of Facility (Section, Township, Range): 37* 00'52.0"N 108*03'36.0"W GPS
Location of Spill (within facility): Train 2 Amine Surge Tank and area to south and southwest	
Did the spill leave containment? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Did the spill migrate off-site? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Did the spill reach a waterway (river, arroyo, etc.)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, please describe:
Describe the impact of the spill on the Environment or Personnel:	
Describe what happened: Amine booster pump started without command following an ESD of facility.	
What actions were taken immediately to contain / cleanup the spill: Earthen dam was placed in ditch to stop advance of spill and vacuum truck was brought in to pickup free liquids from ditch and associated ground. Flint Energy was called to bring in clean up crew for contaminated soil.	
What actions are planned to remediate the spill: Contaminated soil will be hauled to landfarm after tests have been completed and fresh dirt and gravel will be hauled in to replace.	
What was the cause of the spill (contributing factors): Bad switch on Amine booster pump allowing it to start while in Hand mode after ESD was reset	
What actions will be taken to prevent recurrence of a similar incident: Investigation determines we need to have a periodic check on all switches to make sure that equipment does not start without command and that our SPCC Plan is complete.	

**APPENDIX E**  
**CERTIFICATION OF NON-STORMWATER DISCHARGES**

## NON-STORMWATER DISCHARGE ASSESSMENT AND CERTIFICATION

Name of Facility: Coyote Gulch Gas Treating Plant

Completed by:

Title:

*Instructions:* The plant site must be tested or evaluated for non-stormwater discharges whenever there are any changes to the facility that may result in a new non-stormwater discharge. The evaluation should be conducted on a dry day after a period of several days with no precipitation. The evaluation will consist of a visual inspection of the perimeter of the plant site, all drainage ditches/channels/swales that ultimately discharge to the stormwater detention pond, and the inlet and outfall of the stormwater detention pond for the presence of any discharges. If there is a discharge, identify the source of the discharge and determine whether it is an allowable non-stormwater discharge. The results of the evaluation should be recorded below.

Date of Non-Stormwater Discharge Assessment:

Weather during Assessment:

Location Directly Observed During the Test <small>(identify as indicated on the Site Map)</small>	Method Used to Test or Evaluate Discharge	Describe Results From Test for the Presence of Non- Stormwater Discharge	Identify Potential Significant Sources	Name of Person Who Conducted the Test or Evaluation

### CERTIFICATION

I, Dan Jefferson, certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that a qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

Name & Official Title (type or print)

Dan Jefferson, Director of Environmental, Health & Safety

Area Code and Telephone No.

(970) 764-6972

Signature

Date Signed

**APPENDIX F**  
**EMPLOYEE TRAINING RECORDS**

**APPENDIX G**  
**ROUTINE FACILITY INSPECTIONS**







## CHECKLIST FOR MONTHLY SPCC & SW3P INSPECTIONS

Facility name: <b>Coyote Gulch Treating Plant</b>	Location: <b>SE ¼ , Sec 17, T 32N, R11 W</b>	Inspection Date: _____
---	--	------------------------

Item	Description	Yes	No	Remarks:
5	Is the equipment and overall system functioning properly?			
<b>Storage Tanks and Containers (all products):</b>				
6	Are there dents or other signs of physical damage?			
7	Are there visible leaks or drips from tank seams, valves, gaskets, rivets or bolts?			
8	Are fluid level indicators functioning properly?			
9	Are tank or container surfaces or joints corroded?			
10	Are drain valves corroded or damaged?			
11	Are hose connections corroded, loose or leaking?			
12	Are hoses damaged or leaking?			
13	Are tank supports corroded or damaged?			
14	Are vent pipes clear of obstructions and in good condition?			
15	Are fill ports corroded or damaged?			
16	Is there evidence of overfills?			
17	Is the insulation on heated tanks in good condition?			
18	Are out-of-service tanks clearly labeled as such?			



## CHECKLIST FOR MONTHLY SPCC & SW3P INSPECTIONS

Facility name: <b>Coyote Gulch Treating Plant</b>	Location: <b>SE ¼ , Sec 17, T 32N, R11 W</b>	Inspection Date: _____
---	--	------------------------

Item		Yes	No	Remarks:
<b>Dikes, Berms, Curbing and other Physical Barriers for Controlling Spills or Storm Water:</b>				
<b>19</b>	Are the various barriers functioning properly?			
<b>20</b>	Are there signs of damage or deterioration?			
<b>21</b>	Are berms and dikes free of washed out areas?			
<b>22</b>	Is there evidence of animals digging in dike areas?			
<b>23</b>	Is the pond liner in good condition, (not torn or frayed)?			
<b>24</b>	Are the oil booms within the pond connected on the inlet and outlet serviceable?			
<b>Aboveground Pipes and Appurtenances (includes exposed portions of heating-oil piping):</b>				
<b>25</b>	Are there visible leaks or drips from pipes or pipe fittings?			See Item 1
<b>26</b>	Are any pipes or pipe fittings corroded or damaged?			
<b>27</b>	Are any flange or expansion joints corroded or damaged?			
<b>28</b>	Are any pipes unsupported?			
<b>29</b>	Are any pipe supports bent or broken?			
<b>30</b>	Is there wear or corrosion where pipe supports contact the pipes?			
<b>31</b>	Is insulation on heated pipes present and in good condition?			

**CHECKLIST FOR MONTHLY SPCC & SW3P INSPECTIONS**

Facility name: <b>Coyote Gulch Treating Plant</b>	Location: <b>SE ¼ , Sec 17, T 32N, R11 W</b>	Inspection Date: _____
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Item	Yes	No	Remarks:
<b>32</b> Are out-of-service pipes blank flanged and properly labeled?			
<b>Pumps:</b>			
<b>33</b> Are there visible leaks or drips from pumps, pump fittings or hoses?			See Item 1
<b>34</b> Are pump bodies or fittings corroded?			
<b>35</b> Are catch pans present and in good condition?			
<b>36</b> Do any catch pans need to be emptied? (>= ½ full)			
<b>Valves and Fittings:</b>			
<b>37</b> Are there visible leaks or drips from valves or valve fittings?			See Item 1
<b>38</b> Are valve glands or bodies corroded or damaged?			
<b>39</b> Are valve fittings corroded or damaged?			
<b>40</b> Are any valves not closing properly?			
<b>41</b> Are valves properly locked in the closed position when not in use?			
<b>42</b> Are catch pans present and in good condition?			
<b>43</b> Do any catch pans need to be emptied? (>= ½ full)			
<b>Ground Surface (container-storage areas, and filling and dispensing areas):</b>			
<b>44</b> Is there evidence of spills, leaks or drips on the ground?			See Item 1



## CHECKLIST FOR MONTHLY SPCC & SW3P INSPECTIONS

Facility name: <b>Coyote Gulch Treating Plant</b>	Location: <b>SE ¼ , Sec 17, T 32N, R11 W</b>	Inspection Date: _____
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Item		Yes	No	Remarks:
<b>Liquids accumulated within Secondary-Containment Structures:</b>				
<b>45</b>	Are there liquids accumulated in the secondary-containment structures?			
<b>46</b>	Are there fuels or oils present in the secondary-containment structures (e.g., oil sheen)?			
<b>47</b>	How deep are the liquids and do they need to be removed?			
<b>Physical Barriers and Warning Signs around Tanks and Aboveground Pipes:</b>				
<b>48</b>	Are barriers present and in good condition?			
<b>49</b>	Are warning signs present and in good condition?			Warning signs are posted at the main entrance gate.
<b>Portable Containers (capacities of 55-gallons or greater):</b>				
<b>50</b>	Do all portable containers have secondary containment?			
<b>51</b>	Has the inventory of portable containers been updated this month?			
<b>Spill-Response Equipment and Supplies:</b>				
<b>52</b>	Are spill response equipment and supplies available in all operations areas?			
<b>53</b>	Do any of the supplies need to be replenished?			
<b>Training:</b>				
<b>54</b>	Are spill-prevention briefings being held regularly?			
<b>55</b>	Do any staff need to have introductory or operations training?			
<b>56</b>	Have this year's annual refresher training sessions been held?			



## CHECKLIST FOR MONTHLY SPCC & SW3P INSPECTIONS

Facility name: <b>Coyote Gulch Treating Plant</b>	Location: <b>SE ¼ , Sec 17, T 32N, R11 W</b>	Inspection Date: _____
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Item	Yes	No	Remarks:
<b>Security:</b>			
57			Are fences and gates in good condition?
58			Are gates locked when not in use?
59			Are valves on ASTs locked when not in use?
60			Are pump controls locked when not in use?
61			Are lights in good condition and providing adequate coverage of work areas?
<b>Inspections and Integrity Testing:</b>			
62			Have weekly inspections been performed as scheduled?
63			Has an inspection been performed this year during a storm event?
64			Has all integrity testing required this year been performed?
<b>Corrective Actions:</b>			
65			Have previously scheduled corrective actions been completed?
66			Are additional resources needed to complete previously scheduled corrective actions?
<b>Storage Tank and Container Labeling:</b>			
67			Do all storage tanks, vessels and containers have appropriate labeling as to their contents and potential hazard(s) or are they labeled as "empty"

**CHECKLIST FOR MONTHLY SPCC & SW3P INSPECTIONS**

Facility name: <b>Coyote Gulch Treating Plant</b>		Location: <b>SE ¼ , Sec 17, T 32N, R11 W</b>		Inspection Date: _____
Item		Yes	No	Remarks:
68	For chemicals that are stored in their original container, are the original labels still on the containers and are they legible?			
<b>Other conditions, situations or procedures that might contribute to or increase the likelihood of a spill or a discharge from the facility:</b>				
69	Were any other conditions observed during the inspection?			
<b>Stormwater Quality and Erosion/Sediment Control Measures/BMPs</b>				
70	Are all exposed areas of the entire facility in a clean, orderly manner where such exposed areas could contribute pollutants to storm water?			
71	Are all sediment and erosion control measures functioning and in good working order?			
72	Are all material and chemical storage areas in good condition to prevent or minimize contamination of stormwater?			
73	Are all drainage ditches clear with no obstructions?			
74	<b><u>Cooler Fans Washing Activities:</u></b> Were cooler fans washed during the previous month?			
	If yes, were washing activities monitored to ensure that the washwater infiltrated or evaporated and that no washwater flowed into the stormwater detention pond?			
75	Are there any discharges (stormwater or other) from the plant occurring at the time of inspection? If YES, describe.			



**CHECKLIST FOR MONTHLY SPCC & SW3P INSPECTIONS**

**ALL NEGATIVE FINDINGS REQUIRE A CORRECTIVE ACTION FORM TO BE PREPARED SO THAT CORRECTIVE ACTIONS ARE TRACKED AND CORRECTED WITHIN 14 DAYS. SEE CORRECTIVE ACTION PROCEDURES IN STORMWATER POLLUTION PREVENTION PLAN.**

**Additional Remarks:**

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**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Dan Jefferson Title: Director of Environmental, Health & Safety Date: \_\_\_\_\_

Signature: \_\_\_\_\_



**2015 EPA MSGP  
EROSION & SEDIMENT CONTROL INSPECTION REPORT**

General Information			
Project Name	<i>Coyote Gulch Gas Treating Plant</i>		
NPDES Tracking No.		Date of Inspection	
Inspector's Name(s) and Title(s)			
Inspector's Contact Information			
Inspector's Qualifications	<p>An inspector is qualified if the inspector:</p> <ul style="list-style-type: none"> <li>Is knowledgeable in the principles and practices of industrial stormwater controls and pollution prevention, AND</li> <li>Who possess the education and ability to assess conditions at the industrial facility that could impact stormwater quality AND</li> <li>Who possess the education and ability to assess the effectiveness of stormwater controls selected and installed to meet the requirements of the permit.</li> </ul>		
<p>Type of Inspection:</p> <p><input type="checkbox"/> Quarterly    <input type="checkbox"/> Quarterly during a runoff event</p>			
Weather Information			
<p>Weather at time of this inspection?</p> <p><input type="checkbox"/> Clear    <input type="checkbox"/> Cloudy    <input type="checkbox"/> Partly Cloudy    <input type="checkbox"/> Rain    <input type="checkbox"/> Sleet    <input type="checkbox"/> Fog    <input type="checkbox"/> Snow    <input type="checkbox"/> High Winds</p> <p><input type="checkbox"/> Other: _____    Temperature: __°</p>			
<p>Have any previously unidentified discharges of pollutants occurred since the last inspection?    <input type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If yes, describe: _____</p>			
<p>Are there any discharges occurring at the time of inspection?    <input type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If yes, describe: _____</p>			

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**EROSION & SEDIMENT CONTROL INSPECTION REPORT**

EROSION AND SEDIMENT CONTROL INSPECTION REPORT

- See Figure 2 – SW3P Site Map for location of each numbered BMP below.
- Describe the maintenance or corrective action required.
- If routine maintenance is required, describe the needed maintenance and repairs or any failed control measures that need replacement. Provide the dates for when the maintenance was initiated and completed.
- If corrective action is required (i.e., a BMP was never installed, was installed incorrectly, or not in accordance with 2015 MSGP Part 2, or is not being properly operated or maintained), complete a Corrective Action Report.
- If BMPs are in need of maintenance, you must conduct necessary maintenance immediately<sup>1</sup>. If BMPs need to be repaired or replaced, you must immediately take all reasonable steps<sup>2</sup> to minimize or prevent the discharge of pollutants until the final repair or replacement can be implemented. Final repairs/replacement of BMPs should be completed as soon as feasible but no later than within 14 days<sup>3</sup>.

BMP #	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Routine Maintenance or Corrective Action Needed and Notes
1	Earthen diversion berm to the east side of plant	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
2	Earthen diversion berm on east side of boneyard	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
3	Drainage swale to west of boneyard and east of amine coolers and amine pumps	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
4	Rock armored slope on south side of plant	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	

<sup>1</sup> The term “immediately” requires you to, on the same day you identify that a control measure needs to be maintained, take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational. However, if a problem is identified at a time in the work day when it is too late to take action, the initiation of action must begin no later than the following work day.

<sup>2</sup> “All reasonable steps” means that you have undertaken initial actions to assess and address the condition that could result in a discharge of pollutants, including, for example, cleaning up any exposed materials that may be discharged in a storm event or making arrangements (i.e., scheduling) for a new best management practice (BMP) to be installed at a later date.

<sup>3</sup> If it is infeasible to complete the necessary installations or repairs within the 14 calendar day timeframe, document why it is infeasible to complete the installation or repair. Provide the schedule for installing the controls and making them operational. Work must be done as soon as practicable after the 14-day timeframe but no longer than 45 days after discovery. Provide the dates for when each action was initiated and completed.

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**EROSION & SEDIMENT CONTROL INSPECTION REPORT**

BMP #	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Routine Maintenance or Corrective Action Needed and Notes
5	Rocklined channel on south side of plant	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
6	Rocklined drainage swale on south side of Train 2 gas coolers and north side of South channel	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
7	South Channel	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
8	Concrete outlet on east end of South Channel	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
9	Rock check dams in south channel	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
10	Rock inlet protection for culvert in south channel	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
11	Rock outlet protection for culvert in south channel	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
12	Drainage swale on west side of Main Sub-Station	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
13	Rocklined drainage to the north of the drainage swale on west side of Main Sub-Station	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
14	Rocklined drainage swale on west side of	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	

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**EROSION & SEDIMENT CONTROL INSPECTION REPORT**

BMP #	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Routine Maintenance or Corrective Action Needed and Notes
	Train 2 Sump Lined Overflow Pond			
15	Concrete lined channel of the north side of Train 2 Sump Lined Overflow Pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
16	Rocklined inlet to stormwater detention pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
17	Rocklined outlet to stormwater detention pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
18	Stormwater detention pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
19	Turf reinforcement mat around Train 2 Sump Lined Overflow Pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
20	Turf reinforcement mat on west side of the plant.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
21	Check dams in the bar ditch on the east side of the stormwater detention pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
22	Bar ditch on the east side of the stormwater detention pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
23	Rocklined drainage swale on west side of plant and to the east of	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	

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EROSION & SEDIMENT CONTROL INSPECTION REPORT

BMP #	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Routine Maintenance or Corrective Action Needed and Notes
	stormwater detention pond			
24	Bar ditch on south and east side of road to oily wastewater ASTs and stormwater detention pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
25	Bar ditch on north side of road to oily wastewater ASTs and stormwater detention pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
26	Rock outlet protection at west end of bar ditch on north side of road to oily wastewater ASTs and stormwater detention pond	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
27	Rocklined drainage swale on north side of the northern plant fence	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
28	Concrete lined channel with grate on north side of plant and in vicinity of main plant entrance	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
29	Site grading in northwest corner of facility for drainage control as shown on Site Map	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
30	Drainage swale within area to north of office	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	

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**EROSION & SEDIMENT CONTROL INSPECTION REPORT**

BMP #	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Routine Maintenance or Corrective Action Needed and Notes
31	Site grading to north of office for drainage control as shown on Site Map	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
32	Rock inlet protection at culvert at east gate	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
33	Rock inlet protection at culvert under entrance road	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
34	Rock outlet protection at culvert under entrance road	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
35	Bar ditch on north and west side of entrance road	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
36	Bar ditch on east side of entrance road	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
37	Bar ditch on west side of road to gate to the west of boneyard	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
38	Rock check dam at south end of bar ditch on west side of road to gate to the west of boneyard	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
39	Rock check dams by man gate to east of amine reboilers	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
40	Gravel surfaces throughout plant	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair	

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**EROSION & SEDIMENT CONTROL INSPECTION REPORT**

BMP #	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Routine Maintenance or Corrective Action Needed and Notes
			<input type="checkbox"/> Replacement	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	

2015 MSGP  
EROSION AND SEDIMENT CONTROL INSPECTION REPORT  
Stormwater Detention Pond

1. Is there any evidence of, or the potential for, pollutants being discharged at the Stormwater Detention Pond outfall?

Yes  No

If yes, describe and indicate if any corrective action is needed.

\_\_\_\_\_

2. Outfall Maintenance

Does the outfall need maintenance, e.g., replacement of spill boom?  Yes  No

Is there evidence of any channel and bank erosion and/or scour in the immediate vicinity of the discharge point in the drainage due to discharges from the stormwater detention pond?  Yes  No

Does the rock outlet protection need maintenance, e.g., any erosion around the structure or rocks dislodged?  Yes  No

If yes to any of the above, describe and indicate if any corrective action is needed.

3. Is there evidence of pollutants in the drainage?  Yes  No

If yes, describe and indicate if any corrective action is needed:

\_\_\_\_\_

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

\_\_\_\_\_

Additional Control Measures

Describe any additional control measures needed to comply with the 2015 MSGP requirements:

\_\_\_\_\_



2015 MSGP  
EROSION AND SEDIMENT CONTROL INSPECTION REPORT

**INSPECTOR CERTIFICATION**

*Qualified Inspector's signature certifying that the project was in compliance with the SW3P and the 2015 MSGP on the above inspection date, except as noted above).*

**Signature:** \_\_\_\_\_

**Date** \_\_\_\_\_

**CERTIFICATION STATEMENT**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

**Print name and title:** \_\_\_\_\_

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**APPENDIX H**  
**QUARTERLY VISUAL ASSESSMENTS**

## QUARTERLY VISUAL ASSESSMENT REPORT

Name of Facility: Coyote Gulch Gas Treating Plant		
Inspector(s)'s Name(s):		
Sample Location/Outfall:		
Date Pond Discharge Began:	Time Pond Discharge Began:	
Sample Collection Date:	Sample Collection Time:	
Sample Examination Date:	Sample Examination Time:	
Substitute Sample? <input type="checkbox"/> No <input type="checkbox"/> Yes (Identify quarter/year when sample was originally scheduled to be collected.)		
Nature of Discharge: Rainfall <input type="checkbox"/> Snowmelt <input type="checkbox"/>		
Date of Rainfall Event Sampled:		
Duration of Rainfall Event that resulted in the pond discharging (hours)(not applicable to snowmelt):		
Rainfall Amount (inches) (not applicable to snowmelt):		
Estimate of the Total Volume of the Stormwater Discharged from the Pond (Gallons):		
Time in days since the end of the last rainfall event that resulted in a discharge from the pond:		
<b>Visual Quality of Stormwater Discharge<sup>1</sup></b>		
Parameter	Description	Probable Source of Observed Contamination
Color		
Odor		
Clarity		
Floating Solids	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Settled Solids	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Suspended Solids	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Foam	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Oil Sheen <sup>2</sup>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Other		
<sup>1</sup> See attached instruction on determining Visual Quality.		
NOTE: If an oil sheen is visible, the sample will be tested for oil and grease concentration as per Section 10.5.1 of the SW3P.		
Was a grab sample collected during the first 30 minutes of stormwater discharging from the pond? Yes <input type="checkbox"/> No <input type="checkbox"/>		
If not, explain why a grab sample was not collected during the first 30 minutes of discharge.		

## QUARTERLY VISUAL ASSESSMENT REPORT

<p>Detail any concerns, additional comments, descriptions or pictures taken, and any corrective actions taken below (Attach additional sheets as necessary.)</p>
<p>Additional sample data collected as per Section 9.2 of the SW3P:</p> <p>Sample pH: _____</p> <p>Oil and Grease Concentration (if applicable): _____</p>
<p>Inspector's Signature(s): _____</p>
<p style="text-align: center;">CERTIFICATION</p> <p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p> <p>Name: <u>Dan Jefferson</u> Title: <u>Director of Environmental, Health &amp; Safety</u> Date: _____</p> <p>Signature: _____</p>

# QUARTERLY VISUAL ASSESSMENT REPORT

## SAMPLING INSTRUCTIONS

- Frequency: Once per quarter during normal working hours for the entire permit term. However, sampling may be conducted more frequently during seasons when discharges from the pond is more likely to occur. At least one sampling event must capture snowmelt discharge. A minimum of 4 samples must be collected each year.
- Sample Location: At stormwater detention pond outfall
- Sample Type: Grab sample collected within the first 30 minutes of when the pond begins to discharge.
- If it is not possible to collect the samples within the first 30 minutes of discharge, the sample must be collected as soon as practicable but not to exceed 1 hour. It must be documented why it was not possible to take samples within the first 30 minutes
- Sample Volume: Approximately 1 Liter
- Sample Container: Clear plastic
- Sample Collection: Grab samples are collected by direct submersion of a sample container or sampling device. Grab samples should be collected by holding an appropriate container (bucket, sample bottle, etc.) under the outfall of a discharge pipe or by dipping the container downstream of a discharge with the container opening facing upstream.
- If collecting a sample from a natural drainage channel or ditch, be careful not to collect water that has sediment from bottom disturbance. Collect the water sample mid-way between the surface and bottom. Hold the container near its base and plunge it (opening downward) below the water surface. Turn the container under water into the current and bring to the surface.
- Examination of the sample needs to take place in a well-lit area. If the examination cannot take place at the sample site, the sample will need to be prepared for transport to another location. If the sample was collected in a sample bottle, recap bottle. Otherwise, pour sample into a spill proof container for transport. Examine sample in a well-lit area and record your observations on the Quarterly Visual Assessment Report.

## QUARTERLY VISUAL ASSESSMENT REPORT

### INSTRUCTIONS FOR DESCRIBING VISUAL QUALITY OF SAMPLE

Parameter	Method	Results	Source of Contamination
Color	Visual	Clear, Yellow, Red, Blue, Green, Brown, Black, Milky, etc.	If an unusual color is sensed, compare the color to the color of chemicals and other materials used at the facility.
Odor	Smell	None, musty, sewage, earthy, rotten eggs/sulfur, solvents, chlorine, soap, putrescence, sewage, sour, solvents, petroleum/gasoline, musty, etc	If an unusual odor is sensed, compare the odor to the odors of chemicals and other materials used at the facility.
Clarity or Turbidity	Fill clear plastic bottle with stormwater sample and try to see things through it (e.g., newsprint).	<ol style="list-style-type: none"> <li>1) Can't see through the bottle.</li> <li>2) Can see through the bottle but could not read newsprint.</li> <li>3) Can see through bottle and can read newsprint.</li> <li>4) Pretty clear, but not as clear as bottled water.</li> <li>5) Clear as bottled water.</li> </ol>	Look for sources of fine particulate material, such as dust, ash, or other pulverized, ground or powdered chemicals found on the site.
Floating Solids	Visual	Yes/No – Describe what they are.	Compare to raw materials, waste materials, or other known products stored or used on site.
Settled Solids	Use same 1 liter bottle. Let sample set for approximately one-half hour.	Yes/No – if there are solids on the bottom of bottle.	If large amounts, check unpaved, unstabilized areas or areas of erosion.
Suspended Solids	Look through the clear plastic bottle. What do you see?	Yes/No	Look for sources of fine particulate material, such as dust, ash, or other pulverized, ground or powdered chemicals found on the site.
Foam	Visual. Gently shake sample.	Yes/No How thick is the foam? How much of the surface does it cover? What color is the foam?	
Oil Sheen	Visual	Yes/No Flecks, globs, sheen, slick, other.	Look for sources of spilled oil, leaks, etc.
Other obvious indicators of stormwater pollution	Indicate what you observed that would lead a reasonable person to believe that the stormwater is polluted.	Tell it like you see it.	

## QUARTERLY VISUAL ASSESSMENT DOCUMENTATION OF THE RATIONALE FOR NO VISUAL ASSESSMENT

Name of Facility: Coyote Gulch Gas Treating Plant
Inspector's Name(s): _____ Report Date: _____ This report cannot be completed until after the quarter has ended to ensure that there were no discharges from the facility. For example, if there were no discharges for the quarter that began on January 15, 2015 and ended on March 31, 2015, the report date should be dated April 1, 2015 or later.
<b>Reporting Quarter</b> (Select the applicable reporting quarter during which there was no visual monitoring of stormwater discharges) <input type="checkbox"/> October 1, 2015 to December 31, 2015 <input type="checkbox"/> January 1, 2016 to March 31, 2016 <input type="checkbox"/> April 1, 2016 to June 30, 2016 <input type="checkbox"/> July 1, 2016 to September 30, 2016 <input type="checkbox"/> October 1, 2016 to December 31, 2016 <input type="checkbox"/> January 1, 2017 to March 31, 2017 <input type="checkbox"/> April 1, 2017 to June 30, 2017 <input type="checkbox"/> July 1, 2017 to September 30, 2017 <input type="checkbox"/> October 1, 2017 to December 31, 2017
Indicate the outfall(s) where no visual assessment of stormwater discharges were conducted during the monitoring reporting quarter indicated above: <input type="checkbox"/> Outfall <u>No. 001- Stormwater Detention Pond Outfall</u> <input type="checkbox"/> Outfall _____
The 2015 MSGP allows for temporary waivers from monitoring based on adverse climatic conditions. Adverse conditions, including those that are dangerous or create inaccessibility for personnel, may include: <ul style="list-style-type: none"> <li>• local flooding,</li> <li>• high winds,</li> <li>• electrical storms, or</li> <li>• situations which otherwise make sampling impracticable such as drought or extended frozen conditions.</li> </ul>
When adverse weather conditions prevent the collection of samples during a quarter, <b><i>a substitute sample must be collected during the next discharge from the stormwater detention pond.</i></b>
Describe the rationale for why no visual monitoring was conducted during quarter indicated above: <input type="checkbox"/> Drought/No precipitation during the quarter <input type="checkbox"/> No discharge from the stormwater detention pond during the quarter; all runoff during the quarter has been contained in the pond. <input type="checkbox"/> It was impracticable to collect samples within the first 30 minutes of a discharge from the pond <sup>1</sup> . Explain: _____ <input type="checkbox"/> Other reason. Explain: _____
Inspector's Signature: _____

<sup>1</sup> One example is that the discharge occurred at night.

**QUARTERLY VISUAL ASSESSMENT  
DOCUMENTATION OF THE RATIONALE FOR NO VISUAL ASSESSMENT**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Dan Jefferson Title: Director of Environmental, Health & Safety Date: \_\_\_\_\_

Signature: \_\_\_\_\_



**APPENDIX I  
CORRECTIVE ACTION REPORTS**

2015 MSGP  
CORRECTIVE ACTION REPORT

Project Name: COYOTE GULCH GAS TREATING PLANT
Complete this form for each condition requiring a corrective action. Questions 1-5 must be completed within <b>24 hours</b> of discovering the occurrence of one of the triggering conditions.
1. Identify the triggering condition(s):
<input type="checkbox"/> A required control measure was never installed;
<input type="checkbox"/> A required control measure was installed incorrectly;
<input type="checkbox"/> A required control measure is not properly operated or maintained;
<input type="checkbox"/> A required control measure was not installed in accordance with the requirements in Parts 2 and/or 8 of the 2015 MSGP;
<input type="checkbox"/> An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit) to a water of the U.S.
<input type="checkbox"/> Control measure is not stringent enough for the discharge to meet applicable water quality standards.
<input type="checkbox"/> Control measure is inadequate to meet non-numeric effluent limits in this permit.
<input type="checkbox"/> A visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam)
2. Briefly describe the condition triggering the need for corrective action review.  For any spills, leaks or releases that resulted in discharges of pollutants to waters of U.S., through stormwater or otherwise, include the following information: a description of the incident including material, date/time, amount, location, and reason for spill. If a spill report has been completed which includes this information, the spill report can be attached instead and this section can be filled out with "See attached spill report".
3. Date the condition was identified:    /    /
4. Time the condition was identified:
5. Immediate Actions Taken
a. Non-spill condition: Describe the immediate actions taken to minimize or prevent the discharge of pollutants.

2015 MSGP  
CORRECTIVE ACTION REPORT

b. Spills or leaks condition: Describe the immediate actions taken to minimize or prevent the discharge of pollutants.	
i. Describe response actions:	
ii. Date the cleanup was completed:    /    /	
iii. Time the cleanup was completed:	
iv. Notifications made to:	
v. Names of plant personnel involved:	
vi. Describe measures taken to prevent the reoccurrence of similar release:	
<b>CERTIFICATION STATEMENT</b>	
<p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>	
Name: _____	Title: _____
Signature: _____	Date: _____

2015 MSGP  
CORRECTIVE ACTION REPORT

Questions 6-9 must be completed as soon as possible after discovering the occurrence of one of the triggering conditions

6. Describe any corrective actions taken or to be taken within 14 days from the time of discovery of the condition. Provide dates for when each action was initiated and completed.

7. If it is infeasible to complete the necessary installations or repairs within the 14 calendar day timeframe, document why it is infeasible to complete the corrective action. Provide the schedule for installing the controls and making them operational. Work must be done as soon as practicable after the 14-day timeframe but no longer than 45 days after discovery. Provide the dates for when each action was initiated and completed.

8. If the completion of corrective action will exceed the 45 day timeframe, the EPA Regional Office must be notified of your intention to exceed 45 days, the rationale for an extension, and a completion date for the corrective action(s).  
Document the rationale for the extension and the completion date that was provided to EPA below. Provide the actual dates for when each action was initiated and completed.

9. Did/will this corrective action require modification of the SW3P? Yes  No   
If yes, the SW3P must be completed within 14 calendar days of completing the corrective action work.

2015 MSGP  
CORRECTIVE ACTION REPORT

**CERTIFICATION STATEMENT**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**APPENDIX J**  
**ANNUAL REPORTS**

**APPENDIX K**  
**T&E AND HISTORICAL PLACES DOCUMENTATION**

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**Subject:** FW: COMPLETE - Criterion C Eligibility Form Forwarded to the Services, Coyote Gulch Gas Treating Plant, CO

**From:** "Naeser, Robert" <[robert.naeser@tetratech.com](mailto:robert.naeser@tetratech.com)>

**Date:** July 24, 2015 at 4:04:14 PM MDT

**To:** "[djefferson@redcedargathering.com](mailto:djefferson@redcedargathering.com)" <[djefferson@redcedargathering.com](mailto:djefferson@redcedargathering.com)>

**Cc:** MSGPESA <[MSGPESA@epa.gov](mailto:MSGPESA@epa.gov)>

**Subject:** COMPLETE - Criterion C Eligibility Form Forwarded to the Services, Coyote Gulch Gas Treating Plant, CO

This email is in response to the Criterion C Eligibility Form (Form) submitted to U.S. EPA as part of the industrial stormwater Multi-Sector General Permit (MSGP) requirements. The Form submitted for Coyote Gulch Gas Treating Plant was complete and forwarded to the Services (FWS and NMFS) for review on July 24, 2015. You may submit the NOI for permit coverage if no response is received by August 22, 2015.

**Robert B. Naeser** | Senior Environmental Scientist  
Direct: 720.407.1543 | Main: 303.217.5700 | Fax: 303.217.5705  
[robert.naeser@tetratech.com](mailto:robert.naeser@tetratech.com)

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# Criterion C Eligibility Form

## Instructions:

In order to be eligible for coverage under criterion C, you must complete the following form and you must submit it to EPA following the instructions in Section VII a **minimum of 30 days prior to filing your NOI for permit coverage**. After you submit your form, you may be contacted by EPA with additional measures (e.g., additional stormwater controls or modifications to your discharge-related activities) that you must implement in order to ensure your eligibility under criterion C.

If after completing this worksheet you cannot make a determination that your discharges and discharge-related activities are not likely to adversely affect listed threatened or endangered species or designated critical habitat, you must submit this completed worksheet to EPA, and you may not file your NOI for permit coverage until you receive a determination from EPA that your discharges and/or discharge-related activities are not likely to adversely affect listed species and critical habitat.

**Note:** Much of the information needed for this form can be obtained from your draft SWPPP which will be needed when you file your NOI.

## SECTION I. OPERATOR, FACILITY, AND SITE LOCATION INFORMATION.

### 1) Operator Information

a) Operator Name: Red Cedar Gathering Company

b) Point of Contact

First Name: Dan Last Name: Jefferson

Phone Number: 970-764-6972

E-mail: djefferson@redcedargathering.com

### 2) Facility Information

a) Facility Name: Coyote Gulch Gas Treating Plant

b) Check which of the following applies:

I am seeking coverage under the MSGP as a new discharger or as a new source

I am seeking coverage under the MSGP as an existing discharger and my facility has modifications to its discharge characteristics (e.g., changes in discharge flow or area drained, different pollutants) and/or discharge-related activities (e.g., stormwater controls)

Indicate the number of years the facility has been in operation: \_\_\_\_\_ years

Provide your NPDES ID (i.e., permit tracking number) from your previous MSGP coverage: \_\_\_\_\_

I am seeking coverage under the MSGP as an existing discharger and there are no modifications to my facility.

Indicate the number of year the facility has been in operation: 17 years

Provide your NPDES ID (i.e., permit tracking number) from your previous MSGP coverage: COR05A07I

c) Facility Address:

Address 1: Southeast ¼, Section 17, Township 32 North, Range 11 West, New Mexico Principal Meridian

Address 2: La Plata County

City: \_\_\_\_\_ State: CO Zip Code: 81303

d) Identify the primary industrial sector to be covered under the 2015 MSGP:

SIC Code 1311 or Primary Activity Code \_\_\_\_\_

Sector I and Subsector I1

e) Identify the sectors of any co-located activities to be covered under the 201r MSGP:

Sector \_\_\_\_\_ Subsector \_\_\_\_\_

Sector \_\_\_\_\_ Subsector \_\_\_\_\_

Sector \_\_\_\_\_ Subsector \_\_\_\_\_

Sector \_\_\_\_\_ Subsector \_\_\_\_\_

Sector \_\_\_\_\_ Subsector \_\_\_\_\_

Sector \_\_\_\_\_ Subsector \_\_\_\_\_

f) Estimated area of industrial activity exposed to stormwater: 11 acres

g) Provide a general description of the industrial activities that are taking place at this facility:

The facility removes carbon dioxide and dehydrates in the inlet gas stream to meet pipeline specifications. Approximately 260 million standard cubic feet per day of natural gas is recompressed and sent to the TransColorado natural gas transmission line.

3) Receiving Waters Information

List all the stormwater outfalls from your facility.				For each outfall, provide the following receiving water information:	
Outfall ID	Design Capacity (if known)	Latitude (decimal degrees)	Longitude (decimal degrees)	Name of the receiving water that receives stormwater from the outfall and/or from the MS4 that the outfall discharges to	Type of Waterbody (e.g., lake, pond, river/stream/creek, estuarine/marine water)
1		<u>37.0140</u>	<u>108.0627</u>	Coyote Gulch	Ephemeral Drainage
		____.____	____.____		
		____.____	____.____		
		____.____	____.____		
		____.____	____.____		

## SECTION II. ACTION AREA

Ensure that your action area is described in [Attachment 1](#), as required in [Step 2](#).

## SECTION III. LISTED SPECIES AND CRITICAL HABITAT LIST

Ensure that the listed species and critical habitat list is included in [Attachment 2](#), as required in [Step 3](#).

Review your species list in Attachment 2, choose one of the following three statements, and follow the corresponding instructions:

The species list includes only terrestrial species and/or their designated critical habitat. No aquatic or aquatic-dependent species or their critical habitat are present in the action area. **You may skip to [Section IV](#) of this form. You are not required to fill out [Section V](#).**

The species list includes only aquatic and/or aquatic-dependent species and/or their designated critical habitat. No terrestrial species or their critical habitat are present in the action area. **You may skip to [Section V](#) of this form and are not required to fill out [Section IV](#).**

The species list includes both terrestrial and aquatic or aquatic-dependent species and/or their designated critical habitat. **You must fill out both [Sections IV](#) and [V](#) of this form.**

**Note:** For the purposes of this permit, "terrestrial species" would not include animal or plant species that 1) spends any portion of its life cycle in a waterbody or wetland, or 2) if an animal, depends on prey or habitat that occurs in a waterbody or wetland. For example, shorebirds, wading birds, amphibians, and certain reptiles would not be considered terrestrial species under this definition. Please also be aware that some terrestrial animals (e.g., certain insects, amphibians) may have an aquatic egg or larval/juvenile phase.

## SECTION IV. EVALUATION OF DISCHARGE-RELATED ACTIVITIES EFFECTS

*Note: You are only required to fill out this section if your facility's action area contains terrestrial species and/or their designated critical habitat. If your action area only contains aquatic and/or aquatic-dependent species and/or their designated critical habitat, you can skip directly to [Section V](#).*

Most of the potential effects related to coverage under the MSGP are assumed to occur to aquatic and/or aquatic-dependent species. However, in some cases, potential effects to terrestrial species and/or their critical habitat should be considered as well from any discharge-related activities that occur during coverage under the MSGP. Examples of discharge-related activities that could have potential effects on listed terrestrial species or their critical habitat include the storage of materials and land disturbances associated with stormwater management-related activities (e.g., the installation or placement of stormwater control measures).

### A. Select the applicable statement(s) below and follow the corresponding instructions:

There are no discharge-related activities that are planned to occur during my coverage under the MSGP. You can conclude that your discharge-related activities will have no likely adverse effects, and:

- If there are any aquatic or aquatic-dependent species and/or their critical habitat in your action area, you must skip to [Section V](#), *Evaluation of Discharge Effects*, below.
- If there are no aquatic or aquatic-dependent species you may skip to [Section VI](#) and verify that your activities will have no likely adverse effects. You must submit this form to EPA as specified in [Section VII](#) of this form. You may select criterion C on your NOI form and may submit your NOI for permit coverage 30 days after you have submitted this *Criterion C Eligibility Form*. You must also provide a description of the basis for the criterion you selected on your NOI form, **including the species and critical habitat list(s) in your action area**, as well as any other documentation supporting your eligibility. You must also include this completed *Criterion C Eligibility Form* in your SWPPP.

There are discharge-related activities planned as part of the proposal. Describe your discharge-related activities in the following box and continue to (b) below.

*Describe discharge-related activities:*

Maintenance of existing structural and nonstructural erosion and sediment control and stormwater runoff management BMPs.

**B. In order to ensure any discharge-related activities will have no likely adverse effects on listed species and/or their designated critical habitat, you must certify that all the following are true:**

Discharge-related activities will occur:

- on previously cleared/developed areas of the site where maintenance and operation of the facility are currently occurring or where existing conditions of the area(s) in which the discharge-related activities will occur precludes its use by listed species (e.g., work on existing impervious surfaces, work occurring inside buildings, area is not used by species), and
- if discharge-related activities will include the establishment of structures (including, but not limited to, infiltration ponds and other controls) or any related disturbances, these structures and/or disturbances will be sited in areas that will not result in isolation or degradation of nesting, breeding, or foraging habitat or other habitat functions for listed animal species (or their designated critical habitat), and will avoid the destruction of native vegetation (including listed plant species).

If vegetation removal (e.g., brush clearing) or other similar activities will occur, no terrestrial listed species that use these areas for habitat would be expected to be present during vegetation removal.

**If all the above are true, you can conclude that your discharge-related activities will have no likely adverse effects, and:**

- If there are any aquatic or aquatic-dependent species and/or critical habitat in your action area, you must skip to [Section V](#), *Evaluation of Discharge Effects*, below.
- If there are no aquatic or aquatic-dependent species you may skip to [Section VI](#) and verify that your activities will have no likely adverse effects. You must submit this form to EPA as specified in [Section VII](#) of this form. You may select criterion C on your NOI and may submit your NOI for permit coverage 30 days after you have submitted this completed form. You must also provide a description of the basis for the criterion you selected on your NOI form, **including the species and critical habitat list(s)**, and any other documentation supporting your eligibility. You must also include this completed *Criterion C Eligibility Form* in your SWPPP.
- **If any of the above are not true**, you cannot conclude that your discharge-related activities will have no likely adverse effects. You must complete the rest of this form (if applicable), and must submit the form to EPA for assistance in determining your eligibility for coverage.

## SECTION V. EVALUATION OF DISCHARGE EFFECTS

**Note:** You are only required to fill out this section if your facility's action area includes aquatic and/or aquatic-dependent species and/or their critical habitat.

In this section, you will evaluate the likelihood of adverse effects from your facility's discharges. The scope of effects to consider will vary with each facility and species/critical habitat characteristics. The following are examples of discharge effects you should consider:

- **Hydrological Effects.** Stormwater discharges may adversely affect receiving waters from pollutant parameters such as turbidity, temperature, salinity, or pH. These effects will vary with the amount of stormwater discharged and the volume and condition of the receiving water. Where a stormwater discharge constitutes a minute portion of the total volume of the receiving water, adverse hydrological effects are less likely.
- **Toxicity of Pollutants.** Pollutants in stormwater may have toxic effects on listed species and may adversely affect critical habitat. Exceedances of benchmarks, effluent limitation guidelines, or state or tribal water quality requirements may be indicative of potential adverse effects on listed species or critical habitat. However, some listed species may be adversely affected at pollutant concentrations below benchmarks, effluent limitation guidelines, and state or tribal water quality standards. In addition, stormwater pollutants identified in Part 5.2.3.2 of your SWPPP, but not monitored as benchmarks or effluent limitation guidelines, may also adversely affect listed species and critical habitat.

As these effects are difficult to analyze for listed species, their prey, habitat, and designated critical habitat, this form helps you to analyze your discharges and make a determination of whether your discharges will have likely adverse effects and whether there are any additional controls you can implement to ensure no likely adverse effects.

**A. Evaluation of Pollutants and Controls to Avoid Adverse Effects.** In this section, you must document all of your pollutant sources and pollutants expected to be discharged in stormwater. You must also document the controls you will implement to avoid adverse effects on listed aquatic and aquatic-dependent species. You must include specific details about the expected effectiveness of the controls in avoiding adverse effects to the listed aquatic-and aquatic-dependent species. Attach additional pages if needed.

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species. Include information supporting why the control(s) will ensure no adverse effects, including any data you have about the effectiveness of the control(s) in reducing pollutant concentrations. You may also attach photos of your controls to this form.
e.g., vehicle and equipment fueling	e.g., <ul style="list-style-type: none"> <li>• Oil &amp; grease</li> <li>• Diesel</li> <li>• Gasoline</li> <li>• TSS</li> <li>• Antifreeze</li> </ul>	e.g., <ul style="list-style-type: none"> <li>• Fueling operators (including the transfer of fuel from tank trucks) will be conducted on an impervious or contained pad or under cover</li> <li>• Drip pans will be used where leaks or spills of fuel can occur and where making and breaking hose connections</li> <li>• Spill kit will be kept on-site in close proximity to potential spill areas</li> <li>• Any spills will be cleaned-up immediately using dry clean up methods</li> <li>• Stormwater runoff will be diverted around fueling areas using diversion dikes and curbing</li> </ul>

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species.
Material storage: Amine Storage Tank; Lube oil above ground storage tank (AST); Coolant AST; Triethylene glycol AST; Oily wastewater AST; Contaminated soil	Amine Oil Glycol Triethylene glycol (TEG) Oily Wastewater	<ol style="list-style-type: none"> <li>1. Tanks, drums and containers are visually inspected daily and whenever used. Corrective action is taken as necessary.</li> <li>2. Formal tank and container inspections are conducted monthly and are documented on checklists.</li> <li>3. Spill prevention and response for oil and oil related liquids stored at the Coyote Gulch GTP are conducted in accordance with the Spill Prevention Control and Countermeasures (SPCC) regulations. A SPCC plan is in place and fully implemented.</li> <li>4. Spills and leaks are cleaned up following the procedures specified in the SW3P for this facility and in the Southern Ute Growth Fund "Spill Response, Reporting and Prevention Procedures" manual which provides guidance on response, handling, remediation, and reporting of spill of chemicals, oils or wastes.</li> <li>5. Spill response training is provided to employees as part of the employee stormwater and SPCC training. Spill cleanup equipment is readily available. Spills or leaks that occur outside of secondary containment are cleaned up immediately and the materials contaminated by the spill are disposed of according to Federal regulations.</li> <li>6. High level shut down prevents overflow from the amine surge tanks.</li> <li>7. High level alarm on Train 1 oil/water overflow sump will notify operator in the control room.</li> <li>8. Steel or concrete secondary containments are provided at storage tank locations.</li> <li>9. 55 gallon drums or 5 gallon containers of petroleum products are stored in secondary containment.</li> <li>10. Any contaminated soil will be stored in lined 55 gallon drums with bolt closure rings and placed within the secondary containment at the Train 1 skid until disposed of at a permitted facility.</li> <li>11. All stormwater runoff discharges into a 1.97 acre foot stormwater detention pond prior to discharging offsite. In the event that a spill or leak occurs that cannot be cleaned up immediately due to winter conditions or safety concerns, any pollutants associated with the spill or leak that comes in contact with runoff from a storm event will be discharged into the pond. This will allow for the removal and disposal of the stormwater collected in the pond if analysis of the stormwater pond samples indicates there are pollutants at concentrations of concern. A spill boom is installed and maintained at the outfall of the pond to capture any oily substances that got past the other control measures.</li> </ol>
Processing: Gas compression; Hot oil system; Gas treatment system; Oily wastewater collection system; Transformers	Amine Oil Glycol TEG Oily Wastewater	<ol style="list-style-type: none"> <li>1. Concrete curbing or a steel drip tray is provided at processing equipment locations to prevent commingling of stormwater with potential spills or leaks which could be discharged from the plant site. Material from spills and leaks within the secondary containment is collected and sent to the oily wastewater AST.</li> <li>2. The amine surge tanks overflow into the vent tanks. The amine in the vent tanks is pumped back into the system. The vent tanks are kept empty so that they have plenty of capacity for the next upset.</li> <li>3. Spill prevention and response for oil and oil related liquids stored at the Coyote Gulch GTP are conducted in accordance with the SPCC regulations. A SPCC plan is in place and fully implemented.</li> <li>4. Spills and leaks are cleaned up following the procedures in the Southern Ute Growth Fund "Spill Response, Reporting and Prevention Procedures" manual.</li> <li>5. Spill response training is provided to employees as part of the employee stormwater and SPCC training. Spill cleanup equipment is readily available at strategic locations. Spills or leaks that occur outside of secondary containment are cleaned up immediately and the materials contaminated by the spill are disposed of according to Federal regulations.</li> <li>6. Process alarms on the hot oil system and pipe rack notify plant personnel when there are problems which could result in an upset.</li> <li>7. Personnel tour the facility daily and visually inspect ASTs, compressors, pumps, piping and valves for obvious signs of potential leaks and take action as appropriate.</li> <li>8. Transformers are sealed. The larger transformers are located within concrete secondary containment.</li> <li>9. All stormwater runoff discharges into a 1.97 acre foot stormwater detention pond prior to discharging offsite. In the event that a spill or leak occurs that cannot be cleaned up immediately due to winter conditions or safety concerns, any pollutants associated with the spill or leak that comes in contact with runoff from a storm event will be discharged into the pond. This will allow for the removal and disposal of the stormwater collected in the pond if analysis of the stormwater pond samples indicates there are pollutants at concentrations of concern. A spill boom is installed and maintained at the outfall of the pond to capture any oily substances that got past the other control measures.</li> </ol>
Material handling - loading: Amine Storage Tank; Gasoline AST; Diesel AST; Lube Oil AST; Compressor Coolant AST; TEG AST; Hot Oil System Oil AST	Amine Oil Glycol TEG	<ol style="list-style-type: none"> <li>1. Spill prevention and response for oil and oil related liquids stored at the Coyote Gulch GTP are conducted in accordance with the SPCC regulations. A SPCC plan is in place and fully implemented.</li> <li>2. Spills and leaks are cleaned up following the procedures specified in the SW3P for this facility and in the Southern Ute Growth Fund "Spill Response, Reporting and Prevention Procedures" manual.</li> <li>3. Spill response training is provided to employees as part of the employee stormwater and SPCC training. Spill cleanup equipment is readily available at strategic locations. Spills or leaks that occur outside of secondary containment are cleaned up immediately and the materials contaminated by the spill are disposed of according to Federal regulations.</li> <li>4. The filling of the lube oil ASTs at the compressors, the gasoline AST, the diesel AST, the amine tank, and the TEG AST must be visually monitored to prevent the occurrence of an overflow.</li> <li>5. Secondary containment, i.e., drip pan, will be used to catch spills or leaks that could occur at the connection point for filling.</li> <li>6. All stormwater runoff discharges into a 1.97 acre foot stormwater detention pond prior to discharging offsite. In the event that a spill or leak occurs that cannot be cleaned up immediately due to winter conditions or safety concerns, any pollutants associated with the spill or leak that comes in contact with runoff from a storm event will be discharged into the pond. This will allow for the removal and disposal of the stormwater collected in the pond if analysis of the stormwater pond samples indicates there are pollutants at concentrations of concern. A spill boom is installed and maintained at the outfall of the pond to capture any oily substances that got past the other control measures implemented to prevent the release of oil products used at the facility.</li> </ol>
Material handling - unloading: Oily Wastewater AST; Oil Wastewater Collection AST; Oil/Water Overflow Sump Tank	Oil	<ol style="list-style-type: none"> <li>1. Spill prevention and response for oil and oil related liquids stored at the Coyote Gulch GTP are conducted in accordance with the SPCC regulations. A SPCC plan is in place and fully implemented.</li> <li>2. Spills and leaks are cleaned up following the procedures specified in the Southern Ute Growth Fund "Spill Response, Reporting and Prevention Procedures" manual.</li> <li>3. Spill response training is provided to employees as part of the employee stormwater and SPCC training. Spill cleanup equipment is readily available at strategic locations. Spills or leaks that occur outside of secondary containment are cleaned up immediately and the materials contaminated by the spill are disposed of according to Federal regulations.</li> <li>4. Unloading of the Train 1 and Train 2 oily wastewater collection ASTs, the oily wastewater ASTs, and the Train 1 and 2 Oil/Water Overflow Sump Tanks must be visually monitored.</li> <li>5. Secondary containment, i.e., drip pan, will be used to catch spills or leaks at the loadout location.</li> <li>6. All stormwater runoff discharges into a 1.97 acre foot stormwater detention pond prior to discharging offsite. In the event that a spill or leak occurs that cannot be cleaned up immediately due to winter conditions or safety concerns, any pollutants associated with the spill or leak that comes in contact with runoff from a storm event will be discharged into the pond. This will allow for the removal and disposal of the stormwater collected in the pond if analysis of the stormwater pond samples indicates there are pollutants at concentrations of concern. A spill boom is installed and maintained at the outfall of the pond to capture any oily substances that got past the other control measures implemented to prevent the release of oil products used at the facility.</li> </ol>
Equipment fueling and maintenance	Oil Heavy metals Solvents	<ol style="list-style-type: none"> <li>1. Small quantities (hand size containers) of petroleum products, lubricants, and other chemicals are stored out of the weather in enclosures. All containers will be labeled appropriately. Damaged or otherwise illegible labels will be replaced.</li> <li>2. For non oil-related materials, only de minimus quantities of hazardous materials such as lubricants and solvents are stored on site or the materials are not listed in 40 CFR Parts 110, 117, or 302.</li> <li>3. Oily rags, used oil filters and absorbents are disposed of in a special dumpster and are picked up monthly by a waste contractor.</li> <li>4. Other wastes such as batteries, etc. are disposed of as per Southern Ute Growth Fund's Waste Management Procedures manual.</li> <li>5. Diesel and gasoline fuel tanks have secondary containment.</li> <li>6. All equipment is monitored for leaks and receives regular scheduled maintenance to reduce the chance of leakage.</li> <li>7. All equipment maintenance is conducted in a manner such that secondary containment, i.e., drip pan, will be used to catch spills or leaks when removing or changing liquids.</li> <li>8. The oil recycling tank on a trailer which is used to collect oil that is drained from equipment is emptied to the Train 1 or 2 Oily Wastewater ASTs after each use.</li> <li>9. All equipment maintenance waste (including used oil, grease containers, oil filters, etc.) is hauled offsite by waste contractors for disposal at permitted waste facilities.</li> <li>10. Spill prevention and response for oil and oil related liquids stored at the Coyote Gulch GTP are conducted in accordance with the SPCC regulations. A SPCC plan is in place and fully implemented.</li> <li>11. Spills and leaks are cleaned up following the Southern Ute Growth Fund "Spill Response, Reporting and Prevention Procedures" manual</li> <li>12. RCGC's Process Safety Management Mechanical Integrity Program (PSM) ensures that the facility's process equipment and system is properly maintained. This program ensures that the regular inspection and maintenance schedules required for each piece of equipment are conducted. It also is used to maintain the records of the maintenance and repairs performed on all RCGC equipment.</li> </ol>

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species.
Equipment cleaning:	TSS TDS Oil Grease pH	<ol style="list-style-type: none"> <li>1. An alkaline detergent is used for cleaning the compressors, Trains 1 and 2 TEG dehy skids and equipment, and the Train 1 amine skid and related equipment. Washwater from the cleaning of equipment is collected and disposed of at a regulated facility.</li> <li>2. All cooler fans are washed once a year with a mixture of potable water and a scale remover containing phosphoric acid. Washwater is not collected but either infiltrates or evaporates in the immediate vicinity of the fans. Washing activities are monitored to ensure that no washwater flows into the stormwater detention pond.</li> </ol>
Facility roads, Exposed soils	TSS TDS Turbidity	<ol style="list-style-type: none"> <li>1. The facility roads are surfaced with gravel.</li> <li>2. Gravel or concrete is used to stabilize most other areas located within the facility fence that are not occupied by buildings or equipment.</li> <li>3. The speed limit within the facility is 5 miles per hour to reduce the generation of dust.</li> <li>4. Turf reinforcement mat is installed at several locations on the west side of the facility that are susceptible to erosion.</li> <li>5. The cut slope on the south side of the south channel located within the facility fence is armored with rock to reduce erosion of the slope.</li> <li>6. Many of the drainage channels within the facility are lined with rock or concrete to reduce the potential for erosion.</li> <li>7. Check dams are installed in the unlined drainage channels to reduce erosion in the channel and subsequent sedimentation in the stormwater detention pond.</li> <li>8. The drainage control plan for the plant consists of a stormwater detention pond and numerous drainage channels. All stormwater runoff from the industrial activity area of the facility discharges into the pond. The detention pond is sized to store 1.97 acre feet of stormwater, which is in excess of the calculated runoff volume from a 100 year 24-hr storm event. The excess volume is available for sediment storage and accumulated runoff from previous storms.</li> <li>9. Berms, ditches, and site grading are used to divert stormwater run-on away from the industrial activity area of the facility.</li> </ol>
Portable sanitary facility	Untreated raw septage Bacteria Disinfectants	<ol style="list-style-type: none"> <li>1. A licensed sanitary waste management contractor services the portable sanitary facility once per month.</li> <li>2. The portable sanitary facility is staked to the ground to prevent the facility from being tipped over during high winds and spilling raw septage onto the ground.</li> </ol>
Solid waste	Metals Floatables	<ol style="list-style-type: none"> <li>1. Dumpsters and trash cans have lids.</li> <li>2. Trash cans are located at strategic locations around the site to reduce potential litter.</li> <li>3. Litter and other wastes are picked up and disposed of properly on a regular basis.</li> <li>4. The solid waste dumpsters are located inside of a chain link cage to control windblown waste.</li> <li>5. A local solid waste disposal company regularly pickups and disposes of wastes in the dumpster(s) once per month.</li> </ol>

Check if you are not able to make a preliminary determination that any of your pollutants will be controlled to a level necessary to avoid adverse effects on aquatic and/or aquatic-dependent listed species and their designated critical habitat. You must check in [Section VI](#) that you are unable to make a determination of no likely adverse effects, and must complete the rest of the form. You must submit your completed form to EPA for assistance in determining your eligibility for coverage.

**B. Analysis of Effects Based on Past Monitoring Data.** Select which of the following applies to your facility:

- I have no previous monitoring data for my facility because there are no applicable monitoring requirements for my facility's sector(s).
- I have no previous monitoring data for my facility because I am a new discharger or a new source, but I am subject to monitoring under the 2015 MSGP. You must provide information to support a conclusion that your facility's discharges are not expected to result in benchmark or numeric effluent limit exceedances that will adversely affect listed species or their critical habitat:
- My facility has not had any exceedances under the 2008 MSGP of any required benchmark(s) or numeric effluent limits.
- My facility has had exceedances of one or more benchmark(s) or numeric effluent limits under the 2008 MSGP, but I have addressed them during my coverage under the 2008 MSGP, or in my evaluation of controls to avoid adverse effects in (A) above. Describe all actions (including specific controls) that you will implement to ensure that the pollutants in your discharge(s) will not result in likely adverse effects from future exceedances.
- Check if your facility has had exceedances of one or more benchmarks or numeric effluent limits under the 2008 MSGP and you have not been able to address them to avoid adverse effects from future exceedances, or if you are a new discharger or a new source but you are not sure if you can avoid adverse effects from possible exceedances. You must check in [Section VI](#) that you are unable to make a determination of no likely adverse effects. You must submit your completed form to EPA for assistance in determining your eligibility for coverage. You may not file your NOI for permit coverage until you are able to make a determination that your discharges will avoid adverse effects on listed species and designated critical habitat.

**SECTION VI VERIFICATION OF PRELIMINARY EFFECTS DETERMINATION**

Based on Steps I – V of this form, you must verify your preliminary determination of effects on listed species and designated critical habitat from your discharges and/or discharge-related activities :

- Following the applicable Steps in I – V above, I have made a preliminary determination that my discharges and/or discharge-related activities are not likely to adversely affect listed species and designated critical habitats.
- Following the applicable Steps in I – V above, I am **not** able to make a preliminary determination that my discharges and/or discharge-related activities are not likely to adversely affect listed species and designated critical habitats.

**Certification Information**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.





## Attachment 1

Include a map **and a written description** of the action area of your facility, as required in [Step 2](#). You may choose to include the map that is generated from the FWS' on-line mapping tool IPaC (the *Information, Planning, and Consultation System*) located at <http://ecos.fws.gov/ipac/>.

The written description of your action area that accompanies your action area map must explain your rationale for the extent of the action area drawn on your map. For example, your action area written description may look something like this:

*The action area for the (name of your facility)'s stormwater discharges extends downstream from the outfall(s) in (name of receiving waterbody) (# of meters/feet/kilometers/miles). The downstream limit of the action area reflects the approximate distance at which the discharge waters and any pollutants would be expected to cause potential adverse effects to listed species and/or critical habitat because (insert rationale). The action area does/does not extend to the (name of receiving waterbody)'s confluence with (name of confluence waterbody) because (insert rationale).*

Note that your action area written description will be highly site-specific, depending on the expected effects of your facility's discharges and discharge-related activities, receiving waterbody characteristics, etc.

The action area for the Coyote Gulch Gas Treating Plant is limited to the plant's lease boundary, as shown on the attached map. The control measures implemented at the plant and listed in Part V.A. of this form will minimize the exposure of stormwater runoff to pollutant sources. Therefore, the stormwater discharges from the action area are not expected to have any pollutants at concentrations that could have an adverse effect on listed aquatic species.

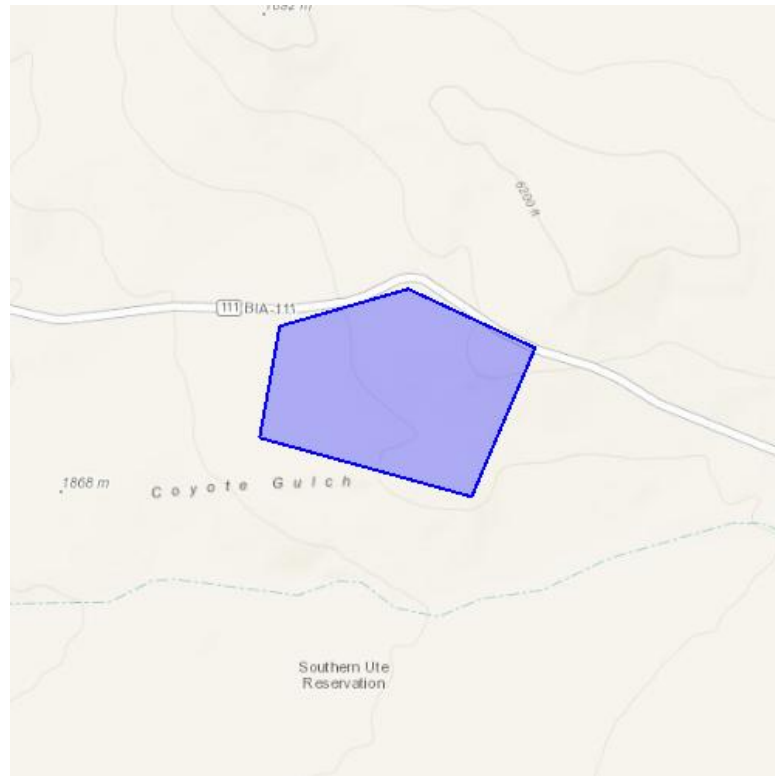
The Coyote Gulch Gas Treating Plant is located in an area of dry washes. Stormwater discharges from the plant will flow into one of these dry washes. The closest river is the La Plata River, which is over 16 miles to the southwest of the plant, through a winding series of dry washes and canyons. Stormwater from the plant is not expected to ever reach the La Plata River. Therefore, there will be no impacts to receiving waterbodies in which listed aquatic species may be present due to stormwater discharges or discharge related activities from this facility.



United States Department of Interior  
Fish and Wildlife Service

Project name: Coyote Gulch Gas Treating Plant MSGP

### Project Location Map:



**Project Coordinates:** MULTIPOLYGON (((-108.06135177612305 37.015150224134985, -108.06341171264648 37.014670486197076, -108.06375503540039 37.01323125421216, -108.06032180786133 37.01247735991362, -108.05929183959961 37.01439634887279, -108.06135177612305 37.015150224134985)))

**Project Counties:** La Plata, CO

## Attachment 2

List or attach the listed species and critical habitat in your action area on this sheet, as required in [Step 3](#). You must include a list for applicable listed NMFS and FWS species and critical habitat. If there are listed species and/or critical habitat for only one Service, you must include a statement confirming there are no listed species and/or critical habitat for the other Service. For FWS species, include the full printout from your IPaC query. *Note: If your Official Species List from the USFWS indicated no species or critical habitat were present in your action area, include the full consultation tracking code at the top of your Official Species List in your NOI submittal in the question "Provide a brief summary of the basis for the criterion selected in Appendix E." If an Official Species List was not available on IPaC, list the contact date and name of the Service staff with whom you corresponded to identify the existence of any USFWS species or critical habitat present in your action area.*

The IPaC species list for the action area is attached. There are six listed species with the potential to occur in the action area. Of these, four are terrestrial species and will not be impacted, since there is no new land disturbance associated with stormwater management related activities planned at the Coyote Gulch Gas Treating Plant. Any land disturbance will be located in previously cleared/developed areas at the facility.

Two species are aquatic and will not be impacted since control measures implemented at the plant will minimize the discharge of any pollutants from the plant. Due to the distance (at least 16 miles) to the first perennial surface water (La Plata River), any pollutants present in the plant's discharge that have not been removed by natural processes will be at such insignificant concentrations when and if the plant's discharge reaches the confluence with the La Plata River as to have no impact on surface water quality.

Therefore, the discharges and/or discharge-related activities at Coyote Gulch Gas Plant are not likely to adversely affect listed species. There is no critical habitat in the action area.



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

Western Colorado Ecological Services Field Office

445 WEST GUNNISON AVENUE, SUITE 240

GRAND JUNCTION, CO 81501

PHONE: (970)243-2778 FAX: (970)245-6933

URL: [www.fws.gov/mountain-prairie/es/Colorado/](http://www.fws.gov/mountain-prairie/es/Colorado/);

[www.fws.gov/platteriver/](http://www.fws.gov/platteriver/)

Consultation Code: 06E24100-2015-SLI-0181

July 15, 2015

Event Code: 06E24100-2015-E-00342

Project Name: Coyote Gulch Gas Treating Plant MSGP

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

### To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment



United States Department of Interior  
Fish and Wildlife Service

Project name: Coyote Gulch Gas Treating Plant MSGP

## Official Species List

### Provided by:

Western Colorado Ecological Services Field Office

445 WEST GUNNISON AVENUE, SUITE 240

GRAND JUNCTION, CO 81501

(970) 243-2778

<http://www.fws.gov/mountain-prairie/es/Colorado/>

<http://www.fws.gov/platterriver/>

**Consultation Code:** 06E24100-2015-SLI-0181

**Event Code:** 06E24100-2015-E-00342

**Project Type:** WATER QUALITY MODIFICATION

**Project Name:** Coyote Gulch Gas Treating Plant MSGP

**Project Description:** updating to the new 2015 MSGP  
no new ground disturbance

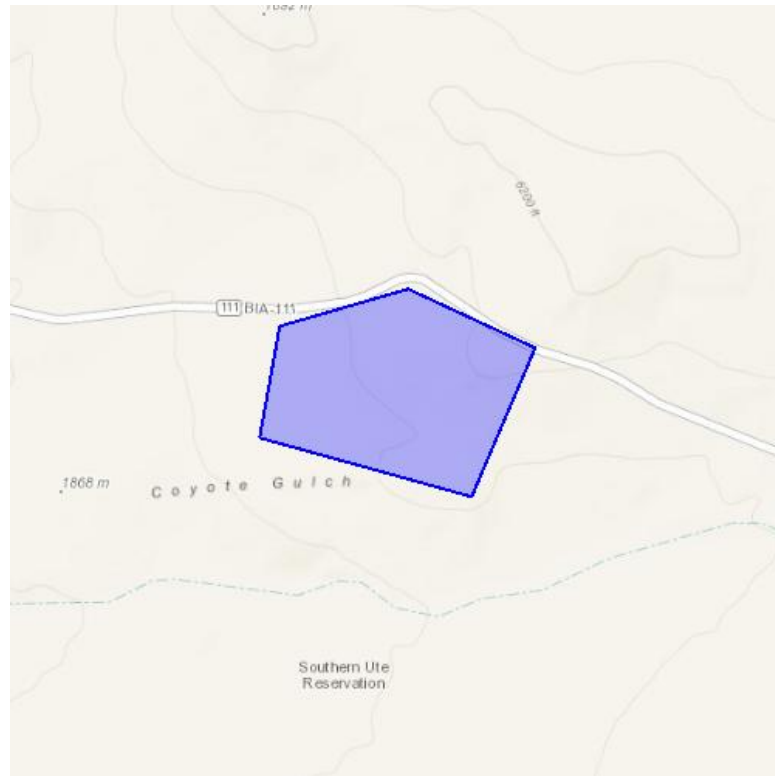
**Please Note:** The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.



United States Department of Interior  
Fish and Wildlife Service

Project name: Coyote Gulch Gas Treating Plant MSGP

### Project Location Map:



**Project Coordinates:** MULTIPOLYGON (((-108.06135177612305 37.015150224134985, -108.06341171264648 37.014670486197076, -108.06375503540039 37.01323125421216, -108.06032180786133 37.01247735991362, -108.05929183959961 37.01439634887279, -108.06135177612305 37.015150224134985)))

**Project Counties:** La Plata, CO





United States Department of Interior  
Fish and Wildlife Service

Project name: Coyote Gulch Gas Treating Plant MSGP

## Endangered Species Act Species List

There are a total of 6 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Birds	Status	Has Critical Habitat	Condition(s)
Mexican Spotted owl ( <i>Strix occidentalis lucida</i> ) Population: Entire	Threatened	Final designated	
Southwestern Willow flycatcher ( <i>Empidonax traillii extimus</i> ) Population: Entire	Endangered	Final designated	
Yellow-Billed Cuckoo ( <i>Coccyzus americanus</i> ) Population: Western U.S. DPS	Threatened	Proposed	
<b>Fishes</b>			
Colorado pikeminnow ( <i>Ptychocheilus lucius</i> ) Population: Entire, except EXPN	Endangered	Final designated	
Razorback sucker ( <i>Xyrauchen texanus</i> ) Population: Entire	Endangered	Final designated	
<b>Mammals</b>			
New Mexico meadow jumping mouse	Endangered	Proposed	



United States Department of Interior  
Fish and Wildlife Service

Project name: Coyote Gulch Gas Treating Plant MSGP

<i>(Zapus hudsonius luteus)</i>			
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United States Department of Interior  
Fish and Wildlife Service

Project name: Coyote Gulch Gas Treating Plant MSGP

## **Critical habitats that lie within your project area**

There are no critical habitats within your project area.

**HISTORIC PROPERTIES PRESERVATION ACT  
2015 MSGP ELIGIBILITY DOCUMENTATION**

Coyote Gulch GTP is an existing facility which was previously covered under the 2000 MSGP. Determination of whether cultural properties listed in the National Register of Historic Places, or eligible for listing, would be affected by stormwater discharges or stormwater discharge-related activities associated with Coyote Gulch Gas Treating Plant was conducted prior to obtaining permit coverage. A qualified contract archaeologist surveyed the plant site cultural resources. Results of the survey are reported in A Cultural Resources Inventory of the Proposed West Area Plant Site in La Plata County, Colorado, August 15, 1995, prepared by Southwest Archaeological Services, Inc., as Technical Report 95-SASI-091S. A single cultural resource, 5LP3942, was encountered during the survey, but was not considered to be National Register eligible. The Bureau of Indian Affairs Albuquerque Area Office (BIA), in a letter of September 28, 1995, and with the concurrence of the Colorado State Historic Preservation Officer, determined that no effect on any National Registered listed or eligible cultural resources would result. Based on this review by the BIA, there is no expected effect on places listed or eligible for listing on the National Register, and thus the plant meets eligibility for coverage under the permit.

This evaluation has addressed the intent and procedures outlined in Appendix F – Procedures Relating to Historic Properties Preservation, of the 2015 NPDES Multi-Sector General Permit for stormwater discharges associated with industrial activities.

**APPENDIX L**  
**2015 MSGP**

**APPENDIX M**  
**STORMWATER DETENTION POND SAMPLING PROCEDURES**

**RED CEDAR GATHERING COMPANY  
COYOTE GULCH GAS TREATING PLANT**

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**1 PURPOSE OF SAMPLING**

The stormwater detention pond must be sampled prior to discharge if the following conditions have occurred:

- A spill at the facility has flowed into the pond, OR
- Stormwater runoff or snowmelt that has been contaminated by flowing over an area where a spill has not been cleaned up (due to winter conditions, safety concerns, or some other reason) flows into the pond

If either of Condition 1 or 2 have occurred since the last discharge from the pond, a sample from the pond must be tested for the contaminants associated with the spill to determine if contaminant concentrations in the stormwater are below levels of concern and the pond is allowed to discharge. Since it takes time to obtain the test results, it will be important to sample well in advance of the water level in the pond reaching the elevation of outfall.

**2 SAMPLING LOCATION**

Samples should be collected near the stormwater detention pond outfall.

**3 SAMPLING PREPARATION**

An adequate stock of sampling supplies and equipment for sampling should be available prior to a sampling event. Supplies that will be needed include, but are not limited to, powder free nitrile or latex gloves, sample collection equipment, cooler, blue ice or ice, appropriate number and volume of sample bottles with labels, indelible ink pen, paper towels, Sampling Activity Log, and Chain of Custody (COC) forms.

**4 SAMPLE ANALYSIS**

Pond samples will be analyzed for the parameters identified by RCGC EHS Specialist (SECMG is also available to assist) based on the type of spill that has occurred. Potential parameters as well as analytical methods are identified in Table 1. Under extenuating circumstances, it may be necessary to contact EPA for consultation on the selection of the appropriate test parameters.

**5 SAMPLE COLLECTION PROCEDURES**

The collection and handling of stormwater samples requires care to ensure the integrity and validity of the samples. Every sample must be collected so as to ensure that the sample is representative of the pond water being tested, must be collected in the right kind of container, be preserved in accordance with the specifications of the analytical method to be used to test

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the sample, and stored cold until delivered to an analytical laboratory. Most laboratories can provide clean sample containers with labels, preservatives, Chain of Custody forms, and additional advice on sample handling and preservation.

Samples will be collected in the pond near the pond's outfall. Grab samples will be collected and preserved in accordance with the following sections and Table 1.

**5.1 Minimize Sample Contamination**

To maintain sample integrity and prevent cross contamination, sampling personnel should:

1. Always wear clean, powder free nitrile/latex gloves when handling the sampling device, sample bottles, and lids.
2. Not smoke, eat or drink during sample collection.
3. Never touch the inside surface of a sample bottle or lid, even with gloved hands.
4. Never touch the inside of a sampling device.
5. Never allow the inner surface of a sample bottle, lid, or sampling device to be contacted by any material other than sample water.
6. Never allow any object or material to fall into or contact the collected sample water.
7. Avoid allowing rain water to drip from rain gear or other surfaces into sample bottles.
8. Not sneeze or cough in the direction of an open sample bottle.
9. Minimize the exposure of the samples to direct sunlight.

**5.2 Sample Bottles**

A sample bottle order should be placed with the analytical laboratory that will be testing the samples. The bottles must be the proper size and material and contain preservatives as appropriate for the specified laboratory analytical methods. In order for the laboratory to fill out the bottle order, the following information must be provided to the laboratory:

- the parameter(s) that you will be sampling, e.g., oil and grease
- the sample matrix, i.e., stormwater
- the targeted reporting limit for each parameter, if available.

Table 1 provides the information needed by the analytical laboratory: potential parameters to be monitored at this facility and the targeted reporting limits for each parameter if available. Immediately following each sampling event, the bottle inventory should be checked and additional bottles ordered as needed. In order to have plenty of bottles on hand, additional bottles should be ordered in case of accidental breakage or contamination.



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**5.3 Sample Collection Equipment**

Sampling devices should be made of chemical resistant materials that will not affect the quality of the stormwater sample. In general suitable sampling devices should be constructed of one of three materials:

1. Teflon
2. glass
3. polyethylene

These materials are known to be the most inert in terms of adsorption or desorption of organic and inorganic compounds.

Suitable sampling equipment for the main groups of parameters monitored is as follows:

- Metals - All sampling equipment used for trace metal determinations such as total recoverable iron must be nonmetallic and free from any material that may contain metals. Acceptable materials include Teflon, polyethylene, and borosilicate glass (Pyrex).
- Organic Compounds - All sampling equipment used for trace organics determination must be glass or Teflon.
- Nutrients - Polyethylene (preferred) or glass sampling equipment and bottles should be used for collection of nutrients such as nitrate plus nitrite nitrogen or total phosphorus
- Conventional Parameters - Polyethylene (preferred) or glass sampling equipment and bottles should be used for collection of conventional parameters such as total suspended solids, total dissolved solids, turbidity, etc.

**5.4 Sample Collection**

Grab samples for parameters other than oil and grease should be collected using a polyethylene disposable bailer (36 inches long by 1.5 inches in diameter) or similar sampling device. The bailer should be placed about 10 feet from the outfall and allowed to slowly sink into the pond. The bailer should be retrieved such that the sample is withdrawn from 2 inches to 30 inches below the surface of the water. Sample containers should be slowly filled using the sampling attachment provided with the bailer.

If a sample is to be tested for oil and grease, the sample must be collected directly into the glass sample bottle. Never collect the sample in another container first and then transfer to the sample bottle because oily residue will collect along the inside of the first collection bottle and make the sample inaccurate. The sample should be collected near the outfall.

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**6 SAMPLE PRESERVATION**

Sample preservation ensures that the sample remains representative of the stormwater discharge at the time of sample collection by prolonging the stability of the constituents in the sample during storage. Sample preservation techniques consist of refrigeration and the addition of chemical preservatives for pH adjustment or chemical fixation.

All samples are to be kept on ice or refrigerated to 4° C from the time of sample collection until delivery to the analytical laboratory. Samples should be placed in an ice chest immediately following collection.

In addition to keeping stormwater samples cool, it is also important to minimize exposure to direct sunlight as sunlight may cause a biochemical transformation of the sample resulting in unreliable analytical results. Therefore all samples are covered or placed in an ice chest with a closed lid immediately following collection.

Samples to be analyzed for certain parameters (depending on the analytical method) require that special chemical preservatives be added to the sample, either in the bottle prior to collection or after collection. The laboratory can provide pre-labeled sample bottles with the chemical preservative already added. In this case, loss of preservative during sample collection must be avoided. This can be accomplished by collecting the sample with another sampling device that has a volume equal to or greater than the required sample volume and then carefully pouring the sample into the pre-preserved sample bottle being careful to not overfill the bottle.

**7 SAMPLE DELIVERY**

All samples must be kept on ice, or refrigerated, from the time of onset of sample collection to the time of receipt by laboratory personnel. If samples are being shipped to the laboratory, place sample bottles inside coolers with blue ice, ensure sample bottles are well packaged (with bubble wrap, foam, etc.) and secure cooler lids with packaging tape.

It is important that all samples be delivered to the analytical laboratory and analysis begun within the maximum holding times specified by laboratory analytical methods. Table 1 provides the maximum holding times for some of the types of sample that may be collected. Therefore, samples should be sent to the analytical laboratory as soon as possible after sampling. It may be necessary to coordinate activities with the analytical laboratory to ensure that holding times can be met. Results for a sample that exceeded the hold time are typically not valid. Sample collection may have to be repeated if possible.

**8 SAMPLE DOCUMENTATION**

Sampling activities will be documented using bottle labels, Sampling Activity Logs, and COC forms. All data documented on sample bottle identification labels, COC forms, and

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Sampling Activity logs will be recorded in waterproof ink. An example of a Sample Activity Log is attached. If an error is made, corrections should be made by drawing one line through the error and entering the correct information. All corrections will be initialed and dated.

**9 DATA MANAGEMENT**

All data including Sampling Activity Logs, COCs, and laboratory reports will be kept with the SW3P.

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**Table 1 Sample Collection, Preservation and Analysis for Stormwater Sampling at Coyote Gulch Gas Treating Plant Stormwater Detention Pond**

Parameter	Analytical Method <sup>1</sup>	Target Reporting Limit	Minimum Sample Volume <sup>2</sup>	Container <sup>3</sup>	Preservative	Holding Time
pH	EPA 150.1	6.5 to 9.0 s.u.	50 mL	50 mL polyethylene	None	15 minutes (Field Test)
Oil and Grease	EPA 413.1	10 mg/L	1000 mL	1 L glass	Add HCl or H <sub>2</sub> SO <sub>4</sub> to a pH < 2. Store in ice or refrigerator at 4°C	28 days
Amines	Modified EPA Method 300/ASTM D6919 by ion chromatography	Measure	500 mL	500 ml polyethylene	Store in ice or refrigerator at 4°C	28 days
Glycols – Triethylene glycol	EPA Method 8015	Measure	1 L	1 L glass	Store in ice or refrigerator at 4°C	7 days until extraction

Notes:

L                liter  
mg/L            milligrams per liter  
mL               milliliters  
HCL             Hydrochloric Acid  
H<sub>2</sub>SO<sub>4</sub>          Sulfuric Acid  
s.u.               Standard Units

<sup>1</sup> Testing may be conducted using other EPA approved analytical methods identified under 40 CFR 136.

<sup>2</sup> Minimum sample volume recommended. Specific volume requirements will vary by laboratory; please check with your laboratory when setting up bottle orders.

<sup>3</sup> Container size may vary by laboratory. Most laboratories can provide clean sample containers with labels, preservatives, chain of custody forms, and advise on sample handling and preservation.

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**SAMPLE ACTIVITY LOG**

Storm Event General Information				
Facility Name:				
Sampler's Name:				
Signature:				
Date of Sampling:				
Storm Data (If applicable)	Storm Start Date & Time:		Storm Duration:	
	Time elapsed since last storm:		Approximate Rainfall Amount:	
For rainfall information: <a href="http://www.cocorahs.org/ViewData/ListDailyPrecipReports.aspx">http://www.cocorahs.org/ViewData/ListDailyPrecipReports.aspx</a>				

Sample Log		
Sample Identification Number	Sample Location	Sample Collection Date and Time