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Governor

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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

January 12, 2012

Mr. Amado, Owner
Amado Recycling
2522 Coors Blvd
Albuquerque, New Mexico 87121

RE: Industrial Storm Water; SIC 5093; NPDES Compliance Evaluation Inspection; Amado Recycling; NMU001783; January 4, 2012

Dear Mr. Amado:

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

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report and required to correct any problems noted during the inspection and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify, in writing, both USEPA (Diana McDonald, USEPA (6EN-WM), 1445 Ross Ave., Dallas, Texas 75202) and NMED (at above address) regarding modifications and compliance schedules.

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

Thank you for your cooperation and assistance during this inspection. If you have any questions about this inspection report, please contact me at (505) 827-2575.

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Surface Water Quality Bureau

Cc: Marcia Gail Adams, EPA, Enforcement Section by e-mail
Carol Peters-Wagnon, EPA by e-mail
Diana McDonald, EPA by e-mail
Samual Tates, EPA, by e-mail
Darlene Whitten-Hill, EPA, by e-mail
NMED District I by e-mail

EPA

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

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
N	NMU0017837	120104	~	S	2

Remarks: SCRAP METAL RECYCLING

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
	2	N	N	

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
Amado Recycling, 2522 Coors Blvd, Albuquerque, New Mexico 87121 **Bernalillo County**	**1000 Hours / 1-4-2011**	**9-29-2008**
	Exit Time/Date **1032/ 1-4-2011**	Permit Expiration Date **9-29-2013**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Mr. Amado/Owner/505-274-2822	**N. 35° 02' 33.54"** **W. -106° 42' 36.42"**
Name, Address of Responsible Official/Title/Phone and Fax Number **Mr. Amado, 2522 Coors Blvd, Albuquerque, New Mexico 87121/Owner/505-274-2822**	Contacted: Yes * No **SIC 5093** **Sector N**

Section C: Areas Evaluated During Inspection

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

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

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

At the time of this inspection Amado Recycling does not have permit coverage under the USEPA NPDES industrial stormwater 2008 Multi-Sector General Permit (MSGP).

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
DANIEL VALENTA */s/Daniel Valenta*	NMED/SWQB 505-827-2575	1/12/2012
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
RICHARD E. POWELL */s/Richard Powell*	505-827-2798	1/12/2012

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Further Explanation

Introduction

On January 4, 2012, a Compliance Evaluation Inspection (CEI) was conducted at Amado Recycling 2522 Coors Blvd, Albuquerque, New Mexico in Bernalillo County by Daniel Valenta of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the operator's status regarding the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges associated with industrial activity under 40 Code of Federal Regulations (CFR) 122.26 and the industrial stormwater Multi-Sector General Permit (MSGP). Amado Recycling is a Scrap Recycling and Waste Recycling facility (see Standard Industrial Classification (SIC) code 5093) that meets the description in Category 40 CFR 122.26(b)(14)(vi), and Sector N of the MSGP.

Upon arrival at 1000 hours on January 4, 2012 the inspector made introductions, stated the purpose of the inspection and presented credentials to the Owner, Mr. Amado. He had limited English language proficiency so his daughter Rube translated. This was the second visit to the facility, the first on 12/28/2011, the Owner was not present. Arrangements had been made to meet on this day. The inspector briefly toured the facility. Following the tour, an on-site exit interview to discuss preliminary findings was conducted with Mr. Amado. The inspector left the facility at approximately 1032 hours.

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

Clean Water Act (CWA) and Industrial Stormwater Permit Requirements

Section 301 (a) of the Federal Water Pollution Control Act states that *"Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this Act, the discharge of any pollutant by any person shall be unlawful."* Federal regulations in 40 CFR Part 122.21(a) Duty to apply (1) states: *"Any person who discharges or proposes to discharge pollutants…must submit a complete application to the Director in accordance with this section and part 124 of this chapter."*

USEPA's MSGP was re-issued effective September 29, 2008 (Federal Register/Vol. 73, No. 189/Monday, September 29, 2008 pg. 56572) and replaced the 2000 MSGP which expired on October 30, 2005. Common requirements for coverage under an industrial stormwater permit include development of a written stormwater pollution prevention plan (SWPPP), implementation of control measures, and sub-mittal of a request for permit coverage, usually referred to as the Notice of Intent or NOI. The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implemented at your facility to minimize the discharge of these pollutants in runoff from the site.

These control measures include site-specific best management practices (BMPs), maintenance plans, inspections, employee training, and reporting. The procedures detailed in the SWPPP must be implemented by the facility and updated as necessary, with a copy of the SWPPP kept on-site.

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These control measures include site-specific best management practices (BMPs), maintenance plans, inspections, employee training, and reporting. The procedures detailed in the SWPPP must be implemented by the facility and updated as necessary, with a copy of the SWPPP kept on-site.

The industrial stormwater permit also requires collection of visual, analytical, and/or compliance monitoring data to determine the effectiveness of implemented BMPs. For more information on EPA's industrial stormwater permit go to **www.epa.gov/npdes/stormwater** and click on "Industrial Activity."

A SWPPP should include the following information:

- A description of potential pollutant sources – includes a site map, an identification of the types of pollutants that are likely to be present in stormwater discharges, an inventory of the types of materials handled at the site that potentially may be exposed to precipitation, a list of significant spills and leaks of toxic or hazardous pollutants, sampling data, a narrative description of the potential pollutant sources from specific activities at the facility, and identification of specific potential pollutants; and

- A description of appropriate measures and controls – includes the type and location of existing and proposed non-structural and structural best management practices (BMPs) selected for each of the areas where industrial materials or activities are exposed to stormwater. Non-structural and structural BMPs to be described and implemented include such things as good housekeeping, preventive maintenance, spill prevention and response procedures, periodic inspections, employee training, record keeping, non-storm water evaluations and certifications, sediment and erosion control, as well as implementation/maintenance of traditional stormwater management practices, where appropriate.

An industrial stormwater fact sheet for Sector N: Scrap Recycling and Waste Recycling Facilities including a summary of typical pollutants associated with activities and types of stormwater control measures (BMPs) used to minimize the discharge of those pollutants is available at USEPA's website: http://www.epa.gov/npdes/pubs/sector_n_scraprecycling.pdf

Pollutants Associated With Material Stockpiling.

During material stockpiling, including the unloading and loading areas, the potential exists for some types of inbound recyclable materials to deposit residual fluids on the ground. Used automotive engines, radiators, brake fluid reservoirs, transmission housings, and lead-acid from batteries may contain residual fluids that, if not properly managed, can eventually come in contact with storm water runoff.

Another concern of outdoor stockpiling, including unloading and loading areas, is associated with deterioration of materials. Metal surfaces that are stockpiled for extended periods may be subject to corrosion. Corrosion is the deterioration of metal surfaces that typically results in the loss of metal to a solution, i.e., water.

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The following metals are referred to as the galvanic (or electromotive) series and have a tendency to corrode and become soluble in water; magnesium, aluminum, cadmium, zinc, steel or iron, cast iron, chromium, tin, lead, nickel, soft and silver solder, copper, stainless, steel, silver, gold, platinum, brass and bronze.

For some metals, the extent and rate of corrosion is dependent on whether it occurs in an oxygen-starved or oxygen-abundant atmosphere. Corrosion of stockpiled materials at scrap recycling facilities is a potential source of pollutants given that metals such as copper, lead, nickel, zinc, chromium and cadmium were frequently detected in sampling data. In addition, the majority of these metals are associated with recyclable materials handled by the scrap recycling industry.

Another significant material of concern is the acceptance and temporary storage of scrap lead acid batteries from automotive vehicles and equipment. If a battery casing becomes cracked or damaged, special precautions are necessary to ensure that the contents do not come in contact with storm water runoff. This includes battery terminals with visible corrosion. In all cases, used batteries should be handled and stored in such a manner as to prevent exposure to either precipitation or runoff

Findings

At the site a wide variety of materials are brought in to be sold and recycled. Some items observed were white goods, automotive tires; radiators, batteries, and electric appliances. See attached photos of assortment of items. Metal items were sorted into piles depending on the type of material. Sorting the materials involved cutting, crushing, and stacking.

This small, less than a half acre, is set up for customers to stop in the front, unload and drive away. Material is then separated and piled up. As the yard fills a wholesale recycler is called who takes the material offsite. The site is mostly covered by a high tin roof which helps in preventing the majority of the rain water from coming in contact with salvage material. The roof is angled for rain to drain away from the site. The shelter does not cover all salvage material, (see photo 3). At the back of the site is a wood truss company and behind them is the Arenal Main Canal. The sides of the canal are elevated. The land slopes from Coors Blvd in the front of the Recycling yard toward the east, the Arenal Main Canal. Mr. Amado said he had not heard of the Multi-Sector General Permit (MSGP) for stormwater discharges associated with industrial activity.

NMED/SWQB
Official Photograph Log

Photo # 1

Photographer: Daniel Valenta	Date: 12/28/2011	Time: 1432 hours
City/County: Albuquerque/Bernalillo		
Location: Amado Recycling, 2522 Coors Blvd, Albuquerque, New Mexico, facing east.		
Subject: Front of Amado Recycling		

NMED/SWQB
Official Photograph Log

Photo # 2

Photographer: Daniel Valenta	Date: 1/4/2012	Time: 1020 hours
City/County: Albuquerque/Bernalillo		
Location: Amado Recycling, 2522 Coors Blvd, Albuquerque, New Mexico, facing west.		
Subject: Assorted scrap in storage area.		

NMED/SWQB
Official Photograph Log

Photo # 3

Photographer: Daniel Valenta	Date: 1/4/2012	Time: 1022 hours
City/County: Albuquerque/Bernalillo		
Location: Amado Recycling, 2522 Coors Blvd, Albuquerque, New Mexico, facing west.		
Subject: Assorted scrap in storage area, not all scrap material is stored under shelter.