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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARKLIN
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TOM SKIBITSKI
Acting Director
Resource Protection Division

Certified Mail – Return Receipt Request

January 15, 2013

Mr. Mark Mosher, Owner
Amfabsteel, Inc
100 Calle Industrial
Bernalillo, New Mexico 87004

**RE: Industrial Storm Water; SIC 3441; NPDES Compliance Evaluation Inspection; Amfabsteel, Inc.;
NPDES Permit NMU001837; January 9, 2013**

Dear Mr. Mosher:

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 Finding 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>.

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: Carol Peters-Wagnon, EPA by e-mail
Diana McDonald, EPA by e-mail
Hannah Branning, EPA by e-mail
Rashida Bowlin, EPA by e-mail
Darlene Whitten-Hill, EPA, by e-mail
NMED District I by e-mail



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

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code			NPDES										yr/mo/day			Inspec. Type		Inspector		Fac Type								
1	N	2	5	3	N	M	U	0	0	1	8	3	7	11	12	1	3	0	1	0	9	17	18	~	19	S	20	2
Remarks																												
F A B R I C A T E D S T R U C T U R A L M E T A L																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----												
67						70						71		72		73 74 75 80												

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time /Date		Permit Effective Date	
Amfabsteel., 100 Calle Industrial, Bernalillo, New Mexico 87004		1340 Hours / 1-9-2013		9-29-2008	
Bernalillo County		Exit Time/Date		Permit Expiration Date	
		1425 Hours/ 1-9-2013		9-29-2013	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
Mr. Mark Mosher/Owner/505-867-6737 fax 505-867-3008 Mr. John Calvert/Shop Foreman/505-328-4285 fax 505-867-3008 Mr. Robert Contreras/ Finance Manager/ 505-867-6737 fax 505-867-3008				N. 35° 17' 40.12" W. -106° 33' 20.25" SIC 3441 Sector AA	
Name, Address of Responsible Official/Title/Phone and Fax Number				Contacted	
Mr. Mark Mosher, 100 Calle Industrial, Bernalillo, New Mexico 87004/Owner/ 505-867-6737 fax 505-867-3008				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

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

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

- Inspector arrived on site at 12340 on 1/9/2013, conducted entrance interview with Mr. John Calvert, during which the Inspector made introductions, showed credentials and explained the purpose of the inspection.
- This report is based on a review of the files maintained by the permittee and NMED, on-site observations by NMED personnel, and verbal information provided by the facility's representative.
- An exit interview to discuss the preliminary finding of the inspection was conducted at approximately 1425 on 1/9/2013 with Mr. John Calvert, and Mr. Robert Contreras at the site on 1/9/2013.

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Telephone/Fax		Date	
DANIEL VALENTA /s/Daniel Valenta		NMED/SWQB 505-827-2575		1/15/2013	
Signature of Management QA Reviewer		Agency/Office/Phone and Fax Numbers		Date	
RICHARD E. POWELL /s/Richard Powell		505-827-2798		1/15/2013	

Amfabsteel Inc.
NPDES Compliance Evaluation
Inspection NMU001837
January 9, 2013

Introduction:

On January 9, 2013, a Compliance Evaluation Inspection (CEI) was conducted at Amfabsteel Inc. at 100 Calle Industrial, Bernalillo, New Mexico in Sandoval County by Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The purpose of this inspection is to document the facility's status regarding the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges associated with industrial activities under 40 CFR 122.26 and the industrial stormwater Multi-Sector General Permit (MSGP). Amfabsteel Inc. is classified as fabricated structural metal (see Standard Industrial Classification [SIC] code 3441) that meets the description in Sector AA of the MSGP.

Upon arrival at 1340 hours on January 9, 2013, the inspector met with Mr. John Calvert, Shop Foreman. The inspector presented his credentials, and explained the purpose of the inspection. The inspector informed Mr. Calvert of the requirements of the Multi-Sector General Permit (MSGP).

Storm water may discharge from the facility into the stormwater inlets on the south side of the property (see photo 1) or into the Bernalillo stormwater system. This area discharges to the Rio Grande in the Rio Grande Basin in Segment 20.6.4.106 of the State of New Mexico Standards for Interstate and Intrastate Surface Waters, New Mexico Administrative Code (NMAC). Designated uses are irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and primary contact; and public water supply on the Rio Grande.

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, 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 on September 29, 2008, (Federal Register/Vol. 73, No. 189/Monday, September 29, 2008 pg. 56572). This 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 submittal of a request for permit coverage, usually referred to as the Notice of Intent (NOI). The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implanted 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.

Amfabsteel Inc.
NPDES Compliance Evaluation
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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 AA, Fabricated Metal Products Manufacturing 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_aa_fabmetal.pdf

Findings:

Amfabsteel is a private company in business at this location since 1984 and has 34 employees. The site appeared to be fairly level with no discernible slope except at the entrance/exit. There are storm drains just outside the facility on the street (see photo 1). These were reported to be plugged and not working. The condition of the drains is unknown at this time. There were no containment berms or other BMPs in place at this time. The area appeared clean and organized except for metal cutting and trash around the dumpster (see photo 2) and what appeared to be used motor oil left in an open 5 gallon container. There was no lid on the dumpster to prevent contact with rainwater. The majority of industrial processes/activities, grinding, cutting, painting, welding, shaving, and metal treating, are performed under covered sheds (see photo 3). These areas are swept and the waste placed in containers to be landfilled.

Your facility does not have permit coverage for the industrial activities associated with Sector AA. You are strongly encouraged to review the permit, complete your SWPPP and apply for coverage under the eNOI system.

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Some common activities, pollutant sources and pollutants that may be associated with this facility include:

Activity	Pollutant Source	Pollutants
Tool workpiece interface/shaving, chipping	Used metal working fluid with fine metal dust	Total suspended solids (TSS), chemical oxygen demand (COD), oil and grease
Parts/tools cleaning, sand blasting, metal surface cleaning, removal of applied chemicals	Solvent cleaners, abrasive cleaners, alkaline cleaners, acid cleaners, rinse waters	Spent solvents, TSS, acid, alkaline waste, oil
Making structural components	Cutting, scraps, turnings, fines	Paints, spent solvents, heavy metals, TSS
Painting operations	Paint and paint thinner spills, sanding, spray painting. Empty containers, paint application wastes, spills, over spraying, storage areas	Paints, spent solvents, heavy metals, TSS, paint wastes, thinner, varnish, heavy metals, spent chlorinated solvents.
Cleanup of spills and drips	Used absorbent materials	TSS, spilled materials
Metal Preparation	Grinding, welding, sawing, shaving, brazing, bending cutting, etching	Steel scraps, aluminum scraps, brass, copper, dust, chips and borings, steel scale, Teflon, manganese.
Surface Treatment	Finishing, plating, case hardening, chemical coating, polishing, rinsing, abrasive cleaning	Acid, aromatic solvent, corn cob, lubricants, sand, oil, pH, nitrates, nitrites, carbon, phosphates, borates, nitrogen, oily sludge, nickel, chromium, hydrofluoric fluid.
Equipment/vehicle maintenance	Leaking fluids, fluids replacement	Oil and grease
Storage of uncoated structural steel	Structural steel being placed on porous pavement	aluminum, lead, zinc, copper, iron, oxide, oil, nickel, and manganese
Storage of galvanized steel directly on the ground	Galvanized material dripping/leaking	Zinc, nickel, cadmium and chromium
Storage areas	Unidentifiable drums/chemicals, extended exposure to weather conditions, tank corrosion and open containers	Benzene, toluene, xylene, and other volatile organics and solvents

**NMED/SWQB
Site Overview**

Google Earth (3/21/2012)

City/County: Bernalillo/Sandoval County		
Location: 100 Calle Industrial, Bernalillo, New Mexico		
Subject: Amfabsteel Inc. facility		



**NMED/SWQB
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 1/9/2013	Time: 1340 hours
City/County: Bernalillo/ Sandoval County		
Location: 100 Calle Industrial, Bernalillo, New Mexico, facing northeast.		
Subject: Amfabsteel storage yard of raw steel materials and finished items.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 1/9/2013	Time: 1316 hours
City/County: Bernalillo/ Sandoval County		
Location: 100 Calle Industrial, Bernalillo, New Mexico, facing east.		
Subject: Amfabsteel storage yard of raw steel materials and finished items.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 1/9/2013	Time: 1350 hours
City/County: Bernalillo/ Sandoval County		
Location: 100 Calle Industrial, Bernalillo, New Mexico, facing east.		
Subject: Amfabsteel facility, oily metal shaving scattered around the waste dumpster.		



**NMED/SWQB
Official Photograph Log**

Photo # 4

Photographer: Daniel Valenta	Date: 1/9/2013	Time: 1347 hours
City/County: Bernalillo/ Sandoval County		
Location: 100 Calle Industrial, Bernalillo, New Mexico, facing east.		
Subject: Amfabsteel facility, majority of the industrial processing of metal is completed under cover.		

