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RYAN FLYNN
Cabinet Secretary
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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 9, 2015

Mr. Steve Miceli,
District Landfill Manager
Waste Management of New Mexico, Inc.
2300 Grande Blvd SE
Rio Rancho, New Mexico 87124

**RE: Four Corners Regional Ecocenter Recycling Facility; Industrial Permit; SIC 5093;
NPDES Compliance Evaluation Inspection; NPDES NMU001891; March 25, 2015**

Dear Mr. Miceli:

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 listed in the inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address above) in writing within 30 days from the date of this letter. Further, notify in writing both USEPA (Racquel Douglas, USEPA (6EN), 1445 Ross Ave., Dallas, Texas, 75202), NMED (at the 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>.

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NMU001891

If you have any questions about this inspection report, please contact Daniel Valenta at 505-827-2575 or at daniel.valenta@state.nm.us.

Sincerely,

/s/Bruce Yurdin

Bruce J, Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

Cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Brent Larsen, USEPA (6WQ-PP) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) e-mail
NMED District II, Robert Italiano by e-mail

Four Corners Regional Ecocenter Recycling Facility
NPDES Tracking No. NMU001891
March 25, 2015

Further Explanation

Introduction

On March 25, 2015, a Compliance Evaluation Inspection (CEI) was conducted at the Four Corners Regional Ecocenter Recycling Facility at 78 County Road 1340, New Mexico in San Juan County by Mr. 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). Four Corners Regional Ecocenter Recycling Facility is a Scrap 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 the facility at 1335 hours the inspector made introductions and stated the purpose of the inspection with Mr. Verlyn Horton, Recycling Lead, Mr. Lonnie Duncan, Operations Manager, arrived shortly afterward, credentials were presented. The Inspector and Messrs. Horton and Duncan toured the facility. Following the tour an on-site exit interview to discuss preliminary findings was conducted. The Inspector left the facility at approximately 1445 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 facility owner.

From a company, see attached, [news release](#) the Four Corners Regional Ecocenter facility officially began operations on June 4, 2012. The facility is a new 12,000 square foot building that houses the region's first full service recyclables processing center. The building will house state of the art equipment used in the sorting and storage of recyclable material which will then be shipped to a material recovery facility. The 34' tall metal building accommodates large recycling drop off trucks as well as individual drop offs.

When the facility opened it was processing 200 to 300 tons of recyclable materials a month, but Waste Management hoped to increase recycling capacity to 1,100 to 1,200 tons a month in the next year. The facility is located at the San Juan County Regional Landfill, which is operated by Waste Management but owned by San Juan County. Waste Management owns and operates the Four Corners Regional Ecocenter facility. The center will increase the life of the landfill and allow the county to collect recycling at its 12 waste stations.

Stormwater may discharge from the site into an unnamed arroyo thence into the Burns Arroyo or the Jones Arroyo and thence the Animas River into the San Juan River in the San Juan River Basin, Segment 20.6.4.403 of the State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC). Designated uses are public water supply, industrial water supply, irrigation, livestock watering, wildlife habitat, marginal coldwater aquatic life, primary contact, and warmwater aquatic life.

Clean Water Act (CWA) and Industrial Stormwater Permit Requirements

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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.”*

Industrial stormwater has been regulated since the promulgation of EPA’s 1990 stormwater regulations, which established NPDES permit requirements for “stormwater discharges associated with industrial activity.” EPA’s first MSGP for stormwater discharges associated with industrial activity was issued on September 29, 1995, and has since been reissued in 2000 and 2008. The 2008 MSGP expired at midnight on September 29, 2013. The Federal Register notice announcing the proposed reissuance of the MSGP was published on September 27, 2013. Because of this timing, the new MSGP was not finalized prior to the expiration of the 2008 MSGP. Facilities that obtained coverage under the 2008 MSGP prior to its expiration were automatically granted an administrative continuance of permit coverage; the administrative continuance will remain in effect until a new permit is issued. Therefore, facilities already covered under the 2008 MSGP are not required to submit a new Notice of Intent (NOI) for permit coverage until the new MSGP is issued, and these facilities must continue to comply with all of the requirements in the 2008 permit, including requirements for monitoring and reporting. Until the new MSGP is issued, however, "new" facilities (*i.e.*, those facilities not covered under the 2008 MSGP) that begin discharging industrial stormwater **after September 29, 2013** are unable to file an NOI for general permit coverage. The No Action Assurance (NAAs) Memorandum dated March 27, 2014 covered these newly-discharging facilities, provided that these facilities: (1) meet the 2008 MSGP eligibility criteria; (2) notify the appropriate EPA permitting authority of their operator status and their intention to operate in accordance with the 2008 MSGP; and (3) comply with all requirements of the 2008 MSGP, including, but not limited to, stormwater pollution prevention plan (SWPPP) development and implementation and proper installation and maintenance of best management practices.

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

Activities, such as material handling and storage, equipment maintenance and cleaning, industrial processing or other operations that occur at industrial facilities are often exposed to stormwater. The runoff from these areas may discharge pollutants directly into nearby waterbodies or indirectly via storm sewer systems, thereby degrading water quality.

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 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.

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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

Findings:

At the site a wide variety of materials are brought in to be bailed and recycled. The majority of the items at the facility appeared to be paper products and plastics. These are then bailed and shipped off site for further processing. The Four Corners Regional Ecocenter facility officially began operations on June 4, 2012 before the expiration of the 2008 MSGP. The facility did not obtain permit coverage when it was available. Thus it may be ineligible for coverage under the NAA first issued on September 27, 2013 and reissued again on September 30, 2014.

**NMED/SWQB
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 3-25-2015	Time: 1431 hours
City/County: Southwest of Aztec New Mexico/San Juan County		
Location: 78 County Road 3140, Aztec, New Mexico, Four Corners Regional Ecocenter Recycling Facility, facing northwest.		
Subject: Entry doors, trucks can enter the facility and discharge recyclable materials.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

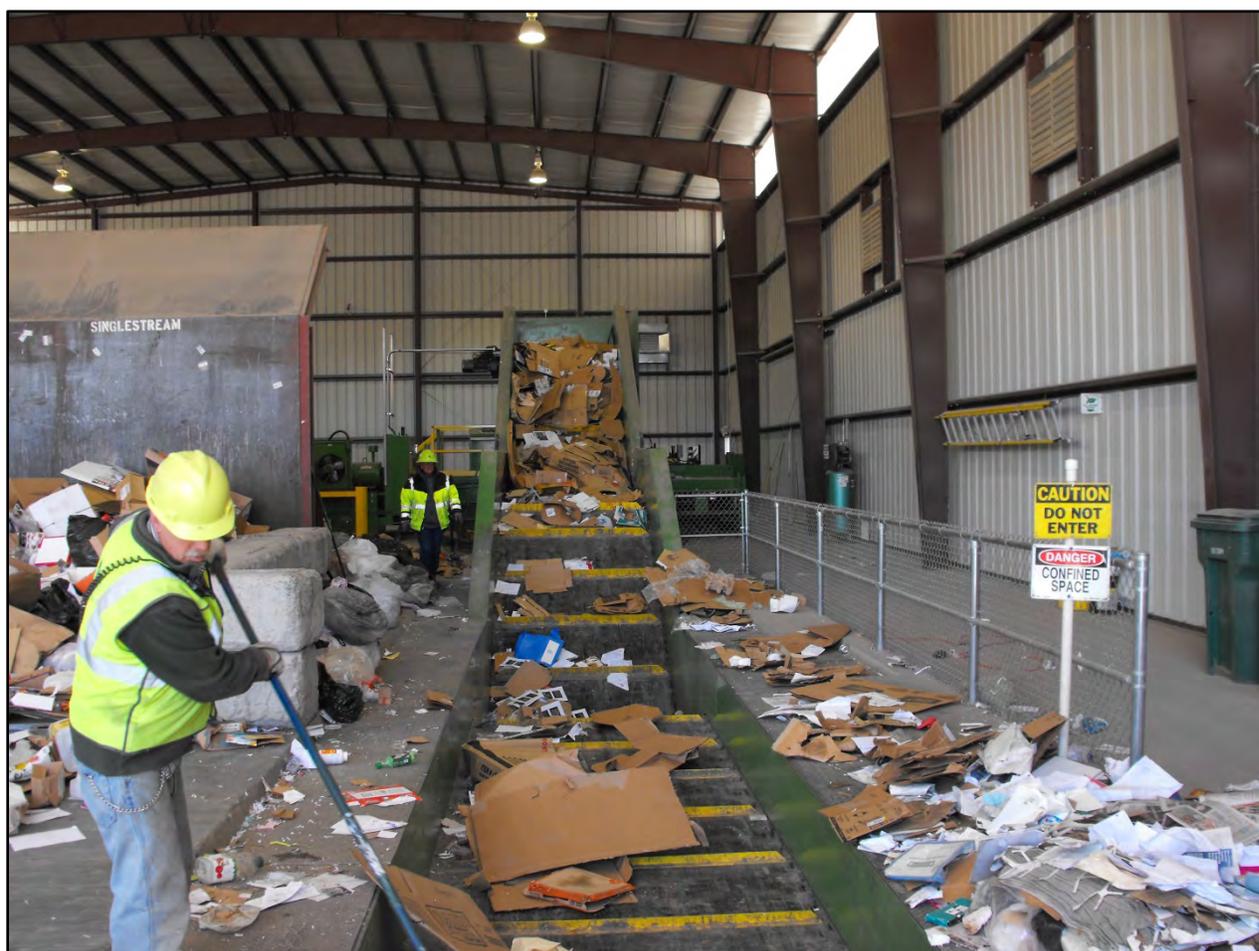
Photographer: Daniel Valenta	Date: 3-25-2015	Time: 1433 hours
City/County: Southwest of Aztec New Mexico/San Juan County		
Location: 78 County Road 3140, Aztec, New Mexico, Four Corners Regional Ecocenter Recycling Facility, facing northeast.		
Subject: Heavy equipment can be used to sort materials for bailing.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 3-25-2015	Time: 1434 hours
City/County: Southwest of Aztec New Mexico/San Juan County		
Location: 78 County Road 3140, Aztec, New Mexico, Four Corners Regional Ecocenter Recycling Facility, facing north.		
Subject: Material is sorted and conveyed to bailing machine.		



**NMED/SWQB
Official Photograph Log**

Photo # 4

Photographer: Daniel Valenta	Date: 3-25-2015	Time: 1437 hours
City/County: Southwest of Aztec New Mexico/San Juan County		
Location: 78 County Road 3140, Aztec, New Mexico, Four Corners Regional Ecocenter Recycling Facility, facing south.		
Subject: Bailed material ready to be shipped.		



**NMED/SWQB
Official Photograph Log**

Photo # 5

Photographer: Daniel Valenta	Date: 3-25-2015	Time: 1431 hours
City/County: Southwest of Aztec New Mexico/San Juan County		
Location: 78 County Road 3140, Aztec, New Mexico, Four Corners Regional Ecocenter Recycling Facility, facing northeast.		
Subject: Waste material not usable is stored in dumpsters and disposed of in the landfill.		



Waste Management of New Mexico Unveils Four Corners Regional Ecocenter Recycling Facility

FOR MORE INFORMATION

Waste Management

Janette Coates
480-457-4702
jcoates@wm.com

Frank Santiago
505-891-6548
fsantia1@wm.com

AZTEC, NM - June 21, 2012 - Waste Management's sustainability commitment and focus on recycling combined with increased recycling participation in the Four Corners area of New Mexico resulted in the construction, completion and recent operation of the Four Corners Regional Ecocenter, a 12,000-square-foot facility processing recyclables for the City of Farmington and surrounding communities. A grand opening ceremony was held earlier today and featured remarks from officials with the City of Farmington, San Juan County and Waste Management. Guests were able to tour the Ecocenter to see how recyclables enter the facility, move along the conveyor and are bailed to send out for processing.

Waste Management of New Mexico entered into an agreement with the City of Farmington to construct the facility for the City's recyclables processing. Waste Management also provides the City of Farmington with residential waste and curbside recycling service, commercial service and roll off service.

"The City of Farmington is setting the pace and more advanced than many areas in the country for rural municipal recycling," said Waste Management Desert Area AZ-NM Area Vice President, Pat DeRueda. "Waste Management's Four Corners Regional Ecocenter will foster further recycling growth in the area."

The facility, which officially began operations on June 4, is currently processing 200 to 300 tons of recyclable materials a month, but hopes to grow recycling capacity to process 1100 to 1200 tons a month in the next year. The Ecocenter adds more opportunities for City of Farmington businesses to recycle, and San Juan County and Four Corners communities to adopt or expand their recycling programs.

"The Four Corners Regional Ecocenter elevates recycling for the City to another level, and is a result of the ongoing vision of City, County and Waste Management leadership," said City of Farmington Mayor Tommy Roberts.

"This recycling hub significantly expands our recycling efforts and allows for the mining of materials that used to be considered waste," said City of Farmington Councilor Jason Sandel. "When the public and private sector work together we get the most resources from an environmental and economic standpoint."

The Ecocenter site is located at the San Juan County Regional Landfill, which is operated by Waste Management and owned by the County. Waste Management owns and operates the Four Corners Regional Ecocenter.

"The opening of the Four Corners Regional Ecocenter will increase the life of the San Juan County Regional Landfill and allows the County to now collect recycling at our 12 waste stations to be brought to this facility so we can all be cleaner and more eco-friendly citizens," said San Juan County Commission Chairman Dr. Jim Henderson.



Waste Management worked with contractor Jaynes Corporation to construct the facility, which took just eight months from groundbreaking to operation.

The Four Corners Region joins Waste Management in our quest to extract the maximum value from the waste stream by diverting recycling materials from the landfill.

About Waste Management

Waste Management of New Mexico and its 200 statewide employees provide services to nearly 147,000 customers throughout the state. For information, visit newmexico.wm.com.

Waste Management, Inc., based in Houston, Texas, is the leading provider of comprehensive waste management services in North America. Through its subsidiaries, the company provides collection, transfer, recycling and resource recovery, and disposal services. It is one of the largest residential recyclers and also a leading developer, operator and owner of waste-to-energy and landfill gas-to-energy facilities in the United States. The company's customers include residential, commercial, industrial, and municipal customers throughout North America. To learn more information about Waste Management visit www.wm.com or www.thinkgreen.com.

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