



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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RON CURRY  
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SARAH COTTRELL  
Deputy Secretary

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**Certified Mail – Return Receipt Requested**

October 4, 2010

Ms. Julie Gutierrez, President  
Roadrunner Redi-Mix Concrete  
106 Industrial Park Loop  
Rio Rancho, NM 87124

**Re: NPDES Industrial Stormwater, SIC 3273, NPDES Compliance Evaluation Inspection, Roadrunner Redi-Mix Concrete, NMR05GI72, September 23, 2010**

Dear Ms. Gutierrez,

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 (Marcia Gail Bohling, USEPA (6EN-WC), 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) was reissued effective September 29, 2008 (see **Federal Register/Vol. 73, No. 189/Monday, September 29, 2008 pg.56572**). For questions regarding permitting, please see: <http://cfpub2.epa.gov/npdes/stormwater/msgp.cfm>.

Thank you for the cooperation your representatives provided during the inspection. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 222-9587.

Sincerely,  
*/s/ Sarah Holcomb*  
Sarah Holcomb  
Environmental Scientist/Specialist  
Surface Water Quality Bureau

Cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Diana McDonald, USEPA (6EN-WM) by e-mail  
Samuel Tates, USEPA (6EN-AS) by e-mail  
NMED, District I, Albuquerque (by e-mail)



**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   R   0   5   G   I   7   2   11   12   1   0   0   9   2   3   17   18   ~   19   S   20   1					
Remarks					
S   I   C     3   2   7   3     R   E   A   D   Y     M   I   X     C   O   N   C   R   E   T   E					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67         69	70   2	71   N	72   N	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) <b>ROADRUNNER REDI-MIX CONCRETE, RIO RANCHO, NM, SANDOVAL COUNTY – FROM I-25, TAKE PASEO DEL NORTE WEST TO COORS BYPASS, THEN HEAD NORTH. COORS BYPASS TURNS INTO HWY 528. FOLLOW TO INDUSTRIAL PARK LOOP. FACILITY IS AT 106 INDUSTRIAL PARK LOOP.</b>	Entry Time /Date <b>1250 HOURS/ 09-23-2010</b>	Permit Effective Date <b>9-30-2008</b>
	Exit Time/Date <b>1430 HOURS/ 09-23-2010</b>	Permit Expiration Date <b>9-30-2013</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MS. TERI TAFOYA, MANAGER (505) 994-3830	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number MS. JULIE GUTIERREZ, PRESIDENT (505) 994-3830 106 INDUSTRIAL PARK RD., RIO RANCHO, NM 87124	GPS: N. 35° 15' 33.65" W. 106° 37' 53.96"	
<p style="text-align: center;">Contacted</p> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *		

**Section C: Areas Evaluated During Inspection**  
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	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)**

**3. SEE ATTACHED REPORT FOR FURTHER EXPLANATION/DETAILS.**

Name(s) and Signature(s) of Inspector(s) <b>SARAH HOLCOMB /s/ Sarah Holcomb</b>	Agency/Office/Telephone/Fax <b>(505) 222-9587</b>	Date <b>10-4-2010</b>
Signature of Management QA Reviewer <b>RICHARD POWELL /s/ Richard Powell</b>	Agency/Office/Phone and Fax Numbers <b>(505) 827-2798</b>	Date <b>10-4-2010</b>

## Further Explanations

### Introduction

On September 23, 2010, a Compliance Evaluation Inspection was conducted at Roadrunner Redi-Mix Concrete, a Ready Mix Concrete Facility (Standard Industrial Classification Code 3273) located in Rio Rancho, New Mexico, by Sarah Holcomb of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). **The purpose of this inspection was to document the facility's status regarding the NPDES storm water permit program and storm water regulations at 40 Code of Federal Regulations Part 122.26.**

This facility is engaged in the production of ready mix concrete products for use at numerous different sites. The facility also does some equipment/vehicle maintenance on site, including oil changes. The mixing operations are conducted indoors. There is a separate enclosed bay for vehicle maintenance procedures.

Storm water from this facility discharges to the Montoyas Arroyo, thence to the Rio Grande, in 20.6.4.105 NMAC of the Rio Grande Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*). Designated uses of the Rio Grande in this section are irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and secondary contact.

The inspector arrived at the facility at 1250 hours and conducted an entrance interview with Ms. Teri Tafoya, Site Manager for Roadrunner Redi-Mix Concrete. The inspector made introductions, presented her credentials and discussed the purpose of the inspection. Ms. Tafoya had one of the dispatchers take the inspector on a tour of the facility.

This report is based on verbal information reported by the facility representative, on-site observations made by NMED personnel, and records maintained by NMED and the USEPA.

### Findings

*Section 301(a) of the Federal Water Pollution Control Act (a.k.a. Clean Water 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.*

*40 Code of Federal Regulations 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."*

This concrete facility did have NPDES permit coverage on the date of this inspection. Storm water discharges from this facility can be regulated by either an individual NPDES permit or the Storm Water Multi-Sector General Permit for Industrial Activities (MSGP). This type of facility is covered under Section E – Glass, Clay, Cement, Concrete and Gypsum Products.

A Storm Water Pollution Prevention Plan (SWPPP) had been prepared in written form, was available at the site for inspection, however, it appeared that it was not being implemented on site. 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 storm water 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 BMPs (Best Management Practices) selected for each of the areas where industrial materials or activities are exposed to storm water. 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 storm water management practices, where appropriate.

**Activities at this ready mix concrete facility can result in the creation of various pollutant sources that include, but are not limited to, the following:**

- **Material Handling for the Manufacture of Ready Mix Concrete:** These activities can be a source of pollutants such as Total Suspended Solids (TSS), Chemical Oxygen Demand (COD), pH, lead, iron and zinc. These pollutants can come from exposed materials such as aggregate, concrete, shale, clay, slate, slag, pumice and limestone, as well as spills or leaks of cement, fly, admixtures and baghouse settled dust.
- **Mixing Concrete:** These activities can be a source of pollutants such as Total Suspended Solids (TSS), Chemical Oxygen Demand (COD), lead, iron, zinc and pH. These pollutants can come from sources such as spilled aggregate, cement and admixture.
- **Vehicle and Equipment Washing at Concrete Product Manufacturing Facilities:** These activities can be a source of pollutants such as Total Suspended Solids (TSS), oil & grease, pH, Chemical Oxygen Demand (COD). These pollutants can come from sources such as residual aggregate, concrete, admixture and oil & grease.
- **Equipment and Vehicle Maintenance:** These activities can be a source of pollutants such as oil & grease, Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD), pH, lead, iron, zinc, aluminum, arsenic, cadmium, chromium and benzene. These pollutants can come from sources such as gasoline, diesel fuel & fuel oil, parts cleaning, waste disposal of solvents, oily rags, oil and gas filters, batteries, coolants & degreasers, and fluid replacement including lubricating fluids, hydraulic fluid, oil, transmission fluid, radiator fluid, solvents and grease.

**If not properly managed or treated in accordance with an NPDES permit, activities associated with the preparation of concrete products at this facility are a potential threat to water quality through storm water discharges.**

### **Site Inspection Summary**

This inspection was prompted by a complaint alleging that the facility was washing out a concrete truck into a storm drain located on Industrial Park Rd. When the allegation was brought up during the inspection, the facility manager and the dispatchers indicated that they perform dust control activities. The facility is unpaved and the trucks drag sediment out into the street. Street cleaning is performed every morning and is usually done with a broom. According to facility representatives, when the dirt is excessive, clean water is used to clean the sediment off the road.

Although the facility did apply for permit coverage, Ms. Tafoya signed the NOI. The permit specifies in Appendix B.11.A.1 that a corporate officer of the company must sign the NOI. Due to the fact that a corporate officer did not sign the NOI, the facility has essentially not had permit coverage this entire time.

The SWPPP was available for review, but there were no documented inspections or monitoring activities and results of analyses. More information needed to be included on the site map for the facility, such as site size, locations of receiving waters, spill locations, and storm water monitoring points.

On the day of the inspection, some pollutant sources observed on site that were exposed outside and could potentially come into contact with storm water included: 1) raw materials storage; 2) residual concrete and contaminated washdown water from truck washdown; 3) used oil containers and concrete color containers that were not secondarily contained.

It appears that the way the facility is graded and walled in enables them to keep some of the stormwater on site. In rare events, it may be possible that the facility would discharge to the Montoyas Arroyo.

For additional information on BMPs and SWPPPs for Sector E, please refer to pages 50867-50877 in the document entitled *Final NPDES Storm Water Multi-Sector General Permit for Industrial Activities* (*Federal Register/Vol. 60, No. 189, Friday, September 29, 1995*). This document can be downloaded from “Storm Water Archived Publications” at:

[https://cfpub2.epa.gov/npdes/docs.cfm?view=archivedprog&program\\_id=6&sort=date\\_published](https://cfpub2.epa.gov/npdes/docs.cfm?view=archivedprog&program_id=6&sort=date_published). This is an older, discontinued permit (1995 MSGP) but contains helpful background information that was not included in the 2008 MSGP.

An exit interview to discuss the preliminary findings of this inspection was conducted on-site with Ms. Tafoya at approximately 1420 hours. The inspector informed the facility representative of the requirements under the NPDES storm water program regarding permitting requirements, preparation of a SWPPP, and installation of appropriate storm water runoff control practices (per the SWPPP).