



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

BILL RICHARDSON  
Governor  
DIANE DENISH  
Lieutenant Governor

Harold Runnels Building, N2050  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, NM 87502  
Phone (505) 827-0187 Fax (505) 827-0160  
www.nmenv.state.nm.us

RON CURRY  
Secretary  
SARAH COTTRELL  
Deputy Secretary

---

**Certified Mail – Return Receipt Requested**

October 22, 2010

Mr. John Monafo, Owner  
US 70 Auto Salvage and Towing  
6338 Clovis Hwy.  
Roswell, NM 88201

**Re: Industrial Stormwater, SIC 5015, NPDES Compliance Evaluation Inspection, US 70 Auto Salvage and Towing, NMU001687, October 8, 2010**

Dear Mr. Monafo,

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 your cooperation 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 email  
Carol Peters-Wagnon, USEPA (6EN-WM) by email  
Diana McDonald, USEPA (6EN-WM) by email  
Samuel Tates, USEPA (6EN-AS) by email



### 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   6   8   7   11   12   1   0   1   0   0   8   17   18   ~   19   S   20   1						
Remarks						
A   U   T   O   R   E   C   Y   C   L   I   N   G						
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----		
67         69	70   1	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>US 70 AUTO SALVAGE AND TOWING, ROSWELL, NM, CHAVES COUNTY – LOCATED ON US 70 EAST OF HIGHWAY 285.</b>	Entry Time /Date <b>0905 HOURS/ 10-8-2010</b>	Permit Effective Date <b>9-30-2008</b>
	Exit Time/Date <b>0915 HOURS/ 10-8-2010</b>	Permit Expiration Date <b>9-30-2013</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. JOHN MONAFO, OWNER (575) 317-8792	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. JOHN MONAFO, OWNER (575) 317-8792 6338 CLOVIS HIGHWAY ROSWELL, NM 88201	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	GPS: N. 33° 29' 5.63" W. 104° 30' 5.77" SIC 5015

#### 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	N	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)

- THIS FACILITY HAD NOT APPLIED FOR REQUIRED NPDES PERMIT COVERAGE.
- THIS FACILITY HAS NOT PREPARED NOR IMPLEMENTED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP).
- 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>10-22-2010</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>10-22-2010</b>

## Further Explanations

### Introduction

On October 8, 2010, a Compliance Evaluation Inspection was conducted at US 70 Auto Salvage and Towing, an Automobile Salvage Yard (Standard Industrial Classification Code 5015) located in Roswell, New Mexico, by Sarah Holcomb (accompanied by Richard Powell) 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 salvage operation of vehicles for parts sales. The facility also conducts a towing business in the Roswell area.

Storm water from this facility discharges to the Middle Berrendo Creek, thence to Berrendo Creek, thence to the Hondo River, in 20.6.4.206 NMAC of the Pecos Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*). Designated uses of the Hondo River in this section are irrigation, livestock watering, wildlife habitat, secondary contact and warmwater aquatic life.

The inspectors arrived at the facility at 0905 hours and conducted an entrance interview with Mr. John Monafo, Owner of US 70 Auto Salvage and Towing. The inspector made introductions, presented her credentials and discussed the purpose of the inspection.

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 auto salvage facility did not have NPDES permit coverage on the date of this inspection, although Mr. Monafo indicated that his consultant was currently working on the SWPPP for the facility and would file the NOI for permit coverage in the near future. 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 M – Automobile Salvage Yards.

A Storm Water Pollution Prevention Plan (SWPPP) had not been prepared in written form, was not available at the site for inspection, and 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 auto salvage yard can result in the creation of various pollutant sources that include, but are not limited to, the following:**

- **Vehicle Dismantling:** These activities can be a source of pollutants such as oil and grease, ethylene glycol, and heavy metals. These pollutants can come from oil, anti-freeze, batteries, gasoline, diesel fuel and hydraulic fluids.
- **Used Parts Storage:** These activities can be a source of pollutants such as sulfuric acid, galvanized metals, heavy metals, petroleum hydrocarbons, and suspended solids. These pollutants can come from sources such as batteries, chrome bumpers, wheel balance weights, tires, rims, filters, radiators, catalytic converters, engine blocks, hub caps, doors, drivelines, galvanized metals, and mufflers.
- **Outdoor Vehicle and Equipment Storage:** These activities can be a source of pollutants such as oil and grease, arsenic, organics, heavy metals, and Total Suspended Solids (TSS). These pollutants can come from sources such as leaking engines, chipping/corroding bumpers, chipping paint and galvanized metals.
- **Vehicle and Equipment Maintenance:** These activities can be a source of pollutants such as chlorinated solvents, oil and grease, heavy metals, acid/alkaline wastes, ethylene glycol, arsenic, and organics. These pollutants can come from sources such as parts cleaning, waste disposal of greasy rags, oil filters, air filters, batteries, hydraulic fluids, transmission fluids, radiator fluids, degreasers, spills of oil, and fluids replacements.
- **Vehicle, Equipment, and Parts Washing Areas:** These activities can be a source of pollutants such as oil and grease, detergents, heavy metals, chlorinated solvents, phosphorus, salts and suspended solids. These pollutants can come from sources such as washing and steam cleaning waters.
- **Liquid Storage in Above Ground Storage Tanks:** These activities can be a source of pollutants such as fuel, oil and grease, heavy metals, and materials being stored. These pollutants can come from sources such as external corrosion and structural failure, installation problems, and spills and overfills due to operator error.
- **Illicit Connection to Storm Sewer:** These activities can be a source of pollutants such as bacteria, Biochemical Oxygen Demand (BOD), suspended solids, oil and grease, heavy metals, chlorinated solvents, fuel, ethylene glycol, detergents, phosphorus, and materials stored or previously used. These pollutants can come from sources such as process wastewater, sanitary water, floor drains, vehicle washwaters, radiator flushing washwater, and leaking underground storage tanks.

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

## Site Inspection Summary

The facility consists of approximately 5 acres of land across which are stored multiple junk cars, some crushed, some whole. There are a couple of trailers located on site which are used for an office.

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) storage of vehicles directly on the ground; 2) oily residuals on the road in front of the facility (please see attached photo); and 3) no apparent BMPs on site to control discharges of fluids to the ground and other pollutants.

For additional information on BMPs and SWPPPs for Sector M, please refer to pages 50945-50952 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 Mr. Monafo at approximately 0915 hours. The inspector informed Mr. Monafo 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).