NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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RON CURRY
Secretary
SARAH COTTRELL
Deputy Secretary

Certified Mail – Return Receipt Requested

October 22, 2010

Mr. Alfredo Sandoval, Owner
Solo Auto Repair
120 East Walnut
Roswell, NM 88201

Re: Industrial Stormwater, SIC 5015, NPDES Compliance Evaluation Inspection, Solo Auto Repair Car Storage Lot, NMU001688, October 8, 2010

Dear Mr. Sandoval,

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

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

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	yr/mo/day	17	Inspec. Type	18	Inspector	19	Fac Type	20
	N	5	NMU0016888	12	101008		~		S		1	

Remarks: AUTO RECYCLING

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	Reserved	74	75	Reserved	80
			1			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)*
SOLO AUTO REPAIR STORAGE LOT, ROSWELL, NM, CHAVES COUNTY –
LOCATED ON US 70 EAST OF HIGHWAY 285.

Entry Time /Date
0915 HOURS/ 10-8-2010

Permit Effective Date
9-30-2008

Exit Time/Date
1000 HOURS/ 10-8-2010

Permit Expiration Date
9-30-2013

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
MR. ALFREDO SANDOVAL, OWNER (575) 622-7080

Name, Address of Responsible Official/Title/Phone and Fax Number
MR. ALFREDO SANDOVAL, OWNER (575) 622-7080
120 EAST WALNUT, ROSWELL, NM 88201

Contacted: Yes * No

Other Facility Data

GPS: N. 33° 29’ 3.38”
W. 104° 30’ 9.15”
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)

1. **THIS FACILITY HAD NOT APPLIED FOR REQUIRED NPDES PERMIT COVERAGE.**
2. **THIS FACILITY HAS NOT PREPARED NOR IMPLEMENTED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP).**
3. **SEE ATTACHED REPORT FOR FURTHER EXPLANATION/DETAILS.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
SARAH HOLCOMB */s/ Sarah Holcomb*	**(505) 222-9587**	**10-22-2010**
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
RICHARD POWELL */s/ Richard Powell*	**(505) 827-2798**	**10-22-2010**

Further Explanations

Introduction

On October 8, 2010, a Compliance Evaluation Inspection was conducted at an empty lot used to store crushed cars owned by Alfredo Sandoval of Solo Auto Repair. This lot is basically an Automobile Salvage Yard (Standard Industrial Classification Code 5015) located in Roswell, New Mexico, and was inspected 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.**

Solo Auto Repair is engaged in the storage of vehicles that may in the future be used in salvage operations 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 irrigation, livestock watering, wildlife habitat, secondary contact and warmwater aquatic life

The inspectors arrived at the facility at 0915 hours and conducted an entrance interview with Mr. Alfredo Sandoval, Owner of Solo Auto Repair, and this particular lot. 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."

Mr. Sandoval did not have NPDES permit coverage for this storage lot on the date of this inspection, although he indicated that he was planning in the future to operate a auto salvage facility and was currently trying to obtain permit coverage. 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 lot consists of approximately 5 acres of land, which contain approximately 20 cars that were crushed within the past few months. Mr. Sandoval indicated that he would like to enter the salvage business in the future but does not currently engage in parts sales from the crushed vehicles at this time.

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 storage of vehicles directly on the ground. Mr. Sandoval did indicate to the inspectors that he does fully drain all of his automobiles of all fluids before they are crushed and stored on the property. He contracts with a hazardous waste company to remove the drums full of fluid from his auto repair business.

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. 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. Sandoval at approximately 0950-1000 hours. The inspectors informed Mr. Sandoval 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).