



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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RON CURRY
Secretary
SARAH COTTRELL
Deputy Secretary

Certified Mail – Return Receipt Requested

December 6, 2010

Mr. Gary Boyd, Vice President
Southwest Custom Acrylics
3455 Princeton NE, Suite B
Albuquerque, NM 87107

Re: Industrial Stormwater, SIC 3089, NPDES Compliance Evaluation Inspection, Southwest Custom Acrylics, NMU001696, December 1, 2010

Dear Mr. Boyd,

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 you 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



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 9 6 11 12 1 0 1 2 0 1 17 18 ~ 19 S 20 1					
Remarks					
P L A S T I C P R O D U C T S					
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) SOUTHWEST CUSTOM ACRYLICS, ALBUQUERQUE, NM, BERNALILLO COUNTY – NEAR INTERSECTION OF CARLISLE AND MENAUL. FROM MENAUL, TURN NORTH ON PRINCETON TO 3455 ON THE WEST SIDE OF THE STREET.	Entry Time /Date 0850 HOURS/ 12-1-2010	Permit Effective Date 9-30-2008
	Exit Time/Date 0900 HOURS/ 12-1-2010	Permit Expiration Date 9-30-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. GARY BOYD, VICE PRESIDENT (505) 881-2989	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. GARY BOYD, VICE PRESIDENT (505) 881-2989 3455 PRINCETON NE, SUITE B, ALBUQUERQUE, NM 87107	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	GPS: N. 35° 07.172" W. 106° 37.222" SIC 3089

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
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	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) SARAH HOLCOMB /s/ Sarah Holcomb	Agency/Office/Telephone/Fax (505) 222-9587	Date 12-6-2010
Signature of Management QA Reviewer RICHARD POWELL /s/ Richard Powell	Agency/Office/Phone and Fax Numbers (505) 827-2798	Date 12-6-2010

Further Explanations

Introduction

On December 1, 2010, a Compliance Evaluation Inspection was conducted at Southwest Custom Acrylics, a custom plastic fabricator (Standard Industrial Classification Code 3089) located in Albuquerque, New Mexico, and was inspected 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.**

Storm water from this facility discharges to the Albuquerque MS4 (specifically into the North Diversion Channel), thence to the Rio Grande in 20.6.4.106 NMAC of the Rio Grande Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*). Designated uses of the segment are irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat, and secondary contact.

The inspector arrived at the facility at 0850 hours and conducted an entrance interview with Mr. Gary Boyd, Vice President. 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."

Southwest Custom Acrylics did not 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 Y – Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries.

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 plastics manufacturing facility can result in the creation of various pollutant sources that include, but are not limited to, the following:

- **Outdoor Material Loading/Unloading:** These activities can be a source of pollutants such as TSS, oil and grease, and organics. These pollutants can come from wooden pallets, spills/leaks from material handling equipment, solvents and resins.
- **Outdoor Material and Equipment Storage:** These activities can be a source of pollutants such as organics, zinc, hydrocarbons, oil and grease, acids, and alkalinity. These pollutants can come from sources such as solvents, acids and caustic, plasticizers, paint, lubricating oils, processing oils, resins, rubber compounds, mineral spirits, zinc, scrap metal, scrap plastic and rubber, plastic pellets, PVC pipe and rags.

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

Site Inspection Summary

The manufacturing and storage of raw materials at this facility is completely indoors. It is feasible that the facility could apply for coverage under a No Exposure Certification.

For additional information on BMPs and SWPPPs for Sector M, please refer to pages 51035-51041 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. Boyd at approximately 0900 hours. The inspector informed Mr. Boyd 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).

