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NEW MEXICO
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DAVE MARTIN
Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

Certified Mail – Return Receipt Requested

February 17, 2011

Mr. Adrian Montoya, Operations Manager
Summit Industries
2900 Stanford NE
Albuquerque, NM 87107

Re: Industrial Storm Water, SIC 3625, NPDES Compliance Evaluation Inspection, Summit Industries, NMU001710, February 15, 2011

Dear Mr. Montoya,

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-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>.

Thank you for the cooperation and assistance that you provided during my visit to your site. 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 Bohling, USEPA (6EN-AS) via e-mail
Samuel Tate, USEPA (6EN-AS) via e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail
Diana McDonald, USEPA (6EN-WM) via e-mail
Jennifer Ickes, NMED District I Manager (via e-mail)
Kathy Verhage, City of Albuquerque DMD (via 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	U	0	0	1	7	1	0	11	12	1	1	0	2	1	5	17	18	~	19	S	20	1			
Remarks																													
E L E C T R I C A L C O M P O N E N T S																													
Inspection Work Days							Facility Evaluation Rating					BI	QA	-----Reserved-----															
67							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) SUMMIT INDUSTRIES, ALBUQUERQUE, NM: FROM I-25, TAKE THE CANDELARIA EXIT AND HEAD EAST ON CANDELARIA. TURN RIGHT ON STANFORD, AND LEFT ON CLAREMONT. FACILITY IS AT 2120 CLAREMONT.	Entry Time /Date 1050 hours / 2-15-2011	Permit Effective Date 09-28-2008
	Exit Time/Date 1120 hours / 2-15-2011	Permit Expiration Date 09-28-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. ADRIAN MONTOYA, OPERATIONS MANAGER (505) 881-8375	Other Facility Data N. 35° 6' 46.37" W. -106° 37' 6.35"	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. VICTOR R. JURY JR, PRESIDENT AND CEO (505) 881-8375 2900 STANFORD NE, ALBUQUERQUE, NM 87107	SIC:3625	
<p style="text-align: center;">Contacted</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *</p>		

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

U	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	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	U	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- INSPECTOR ARRIVED ONSITE AT 1050 HOURS ON FEBRUARY 15, 2011 AND CONDUCTED THE ENTRANCE INTERVIEW WITH MR. ADRIAN MONTOYA, OPERATIONS MANAGER, WHERE THE INSPECTOR MADE INTRODUCTIONS, PRESENTED CREDENTIALS AND DISCUSSED THE PURPOSE OF THE INSPECTION.
- PLEASE SEE REPORT FOR FURTHER DETAILS.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax NMED/SWQB 505-222-9587	Date 2-17-2011
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 2-17-2011

**Compliance Evaluation Inspection
Summit Industries, Sector AC
NPDES Permit #NMU001710, February 15, 2011**

Further Explanations

Introductions

On February 15, 2011, a Compliance Evaluation Inspection was conducted at the Summit Industries facility (Standard Industrial Classification 3625, North American Industrial Classification Code 335314) located in Albuquerque, New Mexico by Sarah Holcomb of the State of New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the operator's status regarding the NPDES multi-sector general storm water permit (MSGP) for industrial activities (this facility has industrial activities being conducted on-site that meet the description of industrial activities in Sector AC) and stormwater regulations at **40 Code of Federal Regulations (CFR) Part 122.26**.

Summit Industries has been in business since 1977, and the Albuquerque facility is the company's headquarters. This facility is engaged in the manufacturing of electrical components. The facility receives shipped electrical components, and assembles those parts (which include wiring and switches) to form relay panels, combination starters, motor starters, lighting control cabinets and other electrical control panels. According to the company's website, some metal fabrication does occur, relating to computer protection distribution panels, bussed gutters for electrical distribution, electronic rack assemblies, lighting panels and panel boxes, electrical distribution junction boxes, and custom enclosures. Additional services listed on the website include variable frequency drives, programmable logic controls for various plc applications and custom name plate fabrication. It appears that all activity is conducted indoors, except for the storage of pallets outside. Some assembly is also done outside but this is rare, according to the facility representative.

Storm water from this facility discharges to the Albuquerque MS4, 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 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 1050 hours. The inspector conducted an entrance interview with Mr. Adrian Montoya, Operations Manager, during which the inspector made introductions, presented her credentials and discussed the purpose of the inspection. Mr. Montoya accompanied the inspector on a tour of the entire facility and explained processes and waste management measures already in place.

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 facility 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 AC – Electronic and Electrical Equipment and Components, Photographic and Optical Goods – under SIC 3625.

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 electrical component production 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 (Total Suspended Solids), oil and grease, and organics. These pollutants can come from sources such as wooden pallets, spills/leaks from material handling equipment, raw materials, finished products and solvents.
- **Outdoor Material and Equipment Storage:** These activities can be a source of pollutants such as organics, oil and grease, acids, alkalinity, and heavy metals. These pollutants can come from sources such as sulfuric acid, alkaline solutions, solvents, miscellaneous chemicals, oily wastes, lead, silver, copper, zinc, spent solvents and acids, scrap metal and wire, and oily rags.

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

Site Inspection Summary

The MSGP was reissued in 2008.

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) pallets stored outside of the building.

For additional information on BMPs and SWPPPs for Sector AC, please refer to pages 51061-51064 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 carried over to either the 2000 or 2008 MSGP.

An exit interview to discuss the preliminary findings of this inspection was conducted on-site with Mr. Montoya at approximately 1115-1120 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).

After returning to the office, the inspector sent Mr. Montoya an email with information on the permitting process, including links to the permit, an example Storm Water Pollution Prevention Plan, guidance documents, Best Management Practices and how to file for coverage using the eNOI system. The inspector also left a business card with Mr. Montoya in case there were questions at a later time.