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ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARTIN
Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

Certified Mail Return Receipt Requested

July 26, 2011

Thomas Link, President
SWBB, Inc.
522 S. Miller Avenue
Farmington, New Mexico 87401

RE: Industrial Storm Water, SIC 3271, NPDES Compliance Evaluation Inspection, SWBB, Inc. / Southwest Building Blocks, Farmington, NMU001747, June 30, 2011

Mr. Link:

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, 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 the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald (6EN-WM)
U.S. Environmental Protection Agency
Allied Bank Tower
Region VI Enforcement Branch
1445 Ross Avenue
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

I appreciate your cooperation during this inspection. If you have any questions about this inspection report, please contact me at 505-827-0418.

Sincerely,

/s/Erin S. Trujillo

Erin S. Trujillo
Surface Water Quality Bureau

cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail
Samuel Bates, EPA (6EN-AS) by e-mail
Carol Peters-Wagon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Jennifer Ickes, NMED District I Manager by e-mail



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

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
N 2 5 3	N M U 0 0 1 7 4 7	11 12 1 1 0 6 3 0 17	18 ~	19 S 20	2
Remarks					
C O N C R E T E B U I L D I N G B L O C K					
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) SWBB, Inc. (Southwest Building Blocks), 522 S. Miller Avenue Farmington, New Mexico 87401. San Juan County	Entry Time /Date 1120 hrs / 06/30/2011	Permit Effective Date September 29, 2008
	Exit Time/Date 1240 hrs / 06/30/2011	Permit Expiration Date September 29, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Thomas Link, President, SWBB, Inc., 505-325-5064	Other Facility Data Main Entrance Latitude 36.725085° Longitude -108.202585° SIC 3271, MSGP Sector E	
Name, Address of Responsible Official/Title/Phone and Fax Number Thomas Link, President, SWBB, Inc., 522 S. Miller Avenue, Farmington, New Mexico 87401 / President / 505-325-5064 and fax 325-5065	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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	U	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)

SWBB, Inc., operator of a concrete building blocks manufacturing facility, did not obtain coverage under the USEPA NPDES industrial stormwater 2008 Multi-Sector General Permit (MSGP) by the deadline of January 5, 2009 or the date of this inspection. The operator's permit coverage under the 2000 MSGP (NPDES Tracking No. NMR05A775) submitted January 8, 2001 expired. The operator did not provide a copy of a Stormwater Pollution Prevention Plan (SWPPP) or other documentation required under the 2000 MSGP. See attached further explanations and general location map.

Name(s) and Signature(s) of Inspector(s) Erin S. Trujillo /s/Erin S. Trujillo	Agency/Office/Telephone/Fax NMED/SWQB/505-827-0418	Date 07/26/2011
Signature of Management QA Reviewer Richard E. Powell /s/Richard E. Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798	Date 07/26/2011

SWBB, Inc. / Southwest Building Blocks
Compliance Evaluation Inspection – Industrial Stormwater
NPDES Tracking No. NMU001747
June 30, 2011

Further Explanation

Introduction

On June 30, 2011, a Compliance Evaluation Inspection (CEI) was conducted at the Southwest Building Blocks, 522 S. Miller Avenue, Farmington, New Mexico in San Juan County by Erin S. Trujillo of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the operator's status regarding the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges associated with industrial activity under 40 Code of Federal Regulations (CFR) 122.26 and the industrial stormwater Multi-Sector General Permit (MSGP).

The facility manufactures concrete building block on-site (see Standard Industrial Classification (SIC) code 3271) that meets the description in Category 40 CFR 122.26(b)(14)(ii), and Sector E (Concrete Products) of the MSGP. Stormwater discharges are to the City of Farmington Municipal Separate Storm Sewer System (MS4), thence to the Animas River in Segment 20.6.4.403 of the State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC).

Animas River from San Juan River to Estes Arroyo includes the designated uses of public water supply, industrial water supply, irrigation, livestock watering, wildlife habitat, marginal coldwater aquatic life, primary contact and warmwater aquatic life. This segment does not support marginal coldwater aquatic life. The listed probable causes of impairment include nutrient/eutrophication biological indicators. Probable sources of impairment include: drought-related impacts, flow alterations from water diversions, municipal (urbanized high density area), municipal point source discharges, and streambank modifications/destabilization. Total maximum daily loads for Total Phosphorus and Total Nitrogen in the Animas River were approved by USEPA on August 26, 2005.

Upon arrival at 1120 hours on the day of this inspection, the inspector made introductions, stated the purpose of this inspection and presented credentials to Mr. Thomas Link, President, SWBB, Inc. The inspector and Mr. Link toured the facility. Following the tour, an on-site exit interview to discuss preliminary findings was conducted with Mr. Link. The inspector left the facility at approximately 1240 hours on the day of this inspection.

This report is based on review of EPA's on-line notice of intent (eNOI) database, files maintained by NMED, and on-site observation by NMED personnel, and verbal information provided by the operator's on-site representative.

Clean Water Act (CWA) and Industrial Stormwater Permit Requirements

Section 301 (a) of the Federal Water Pollution Control 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.”* Federal regulations in 40 CFR 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.”*

USEPA's MSGP was re-issued effective September 29, 2008 (Federal Register/Vol. 73, No. 189/Monday, September 29, 2008 pg. 56572) and replaced the 2000 MSGP which expired on October 30, 2005. To obtain permit coverage under the MSGP, an operator must complete a Stormwater Pollution Prevention Plan (SWPPP) that among other things documents eligibility for permit coverage, and submit a Notice of Intent (NOI) to the USEPA. 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 best management practices (BMPs) 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.

An industrial stormwater fact sheet for Sector E: Glass, Clay, Cement, Concrete, and Gypsum Product Manufacturing Facilities including a summary of typical pollutants associated with activities and types of stormwater control measures (BMPs) used to minimize the discharge of those pollutants is available at USEPA's website:

http://www.epa.gov/npdes/pubs/sector_e_glass.pdf.

On-site Industrial Activity and Potential Pollutants

Southwest Building Blocks, a concrete building block manufacturing facility, has been in operation at this site since 1997. Various aggregate, iron oxide colorant (pigments) and surfactants are used in the manufacturing of concrete blocks on site. On-site activities also include outside storage and stockpiling of raw materials; concrete block cutting using water; and vehicle/equipment maintenance and fueling.

Potential pollutants associated with storage of materials, material handling and mixing concrete at concrete manufacturing facilities include total suspended solids (TSS), chemical oxygen demand (COD), biological oxygen demand (BOD), oil and grease (O&G), pH, lead, iron, and zinc. Also, potential pollutants (COD, BOD, O&G, pH, metals and benzene) are associated with equipment/vehicle maintenance activities.

Findings

SWBB, Inc. permit coverage under the USEPA 2000 MSGP submitted January 8, 2001 expired (NPDES Tracking No. NMR05A775). The operator did not obtain coverage under the USEPA 2008 MSGP by the deadline of January 5, 2009 or the date of this inspection. The operator's on-site representative indicated he was unaware that the permit had expired and needed to re-apply.

A copy of a site-specific SWPPP was not made available at the time of this inspection or the date of this report (see Part 4.11 for SWPPP and Part 8 for records retention requirements of the 2000 MSGP). There was no documentation that MSGP requirements were implemented (e.g., inspections, quarterly visual monitoring, analytical benchmark monitoring, comprehensive compliance site evaluation, etc.). The

operator's on-site representative stated that a SWPPP was prepared by a consultant and inspections had been conducted; but, the plan was not found on the day of this inspection. The operator's on-site representative also stated that inspections had stopped. No consultant contacts, specific inspection dates or written reports of inspections were provided by the operator's on-site representative by the date of this report.

Generally, the site appeared to have good housekeeping practices for waste and garbage. There was no observed windblown trash or debris. A trash dumpster and several trash containers were located on site. Trash is picked up on a regular schedule (twice a week) and sweeping of the paved surfaces is contracted once a month according to the operator's on-site representative.

Pollutant sources were stored outside exposed to rain, snow, snowmelt, and runoff including aggregate materials and broken blocks. Hydraulic oils, diesel, and waste antifreeze were stored outside in closed containers and tanks. Waste and fuel storage tanks did not have secondary containment in case of spills or leaks. There were no measures to control dust generation from the raw material aggregate stored on site. Some solids tracking was observed at the facility's back entrance on East Pinon Street.

There was no evidence of non-storm water discharges on the day of this inspection, but waters used to cut block are not captured and could become a source of pollutants. Additional structural or non-structural control measures may be needed to ensure that there are no unauthorized discharges.

If not properly managed or minimized in accordance with USEPA's NPDES MSGP, pollutants in stormwater and any allowable non-stormwater discharges from this facility's industrial activity are a potential threat to water quality.

NMED/SWQB General Aerial Map		
Created by: Erin Trujillo		
City/County: Farmington / San Juan County		State: New Mexico
Location: SWBB, Inc., Southwest Building Blocks, 522 S. Miller Avenue		

