



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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



DAVE MARKLIN
Secretary

BUTCH TONGATE
Acting Deputy Secretary

Certified Mail - Return Receipt Requested

October 20, 2011

Mr. Tom Link, President
Southwest Building Blocks, Inc.
522 S. Miller Avenue
Farmington, New Mexico 87401

RE: Industrial Storm Water; SIC 3271; NPDES Compliance Evaluation Inspection; Southwest Building Blocks Kirtland Manufacturing Plant; NPDES Permit NMU001770; October 12, 2011

Dear 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 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 (Diana McDonald, USEPA (6EN-WM), 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 your cooperation and assistance during this inspection. If you have any questions about this inspection report, please contact me at (505) 827-2575.

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Surface Water Quality Bureau

Cc: Marcia Gail Adams, EPA, Enforcement Section by e-mail
Carol Peters-Wagnon, EPA by e-mail
Diana McDonald, EPA by e-mail
Samual Tate, EPA, by e-mail
Darlene Whitten-Hill, EPA, by e-mail
NMED District II 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
1 N 2 5 3 N M U 0 0 1 7 7 0 11 12 1 1 1 0 1 2 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 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 Building Blocks Kirtland Plant, 4343 Hwy 64, Kirtland, New Mexico San Juan County	Entry Time /Date 1355 Hours / 10-12-2011	Permit Effective Date 9-29-2008
	Exit Time/Date 1420/ 10-12-2011	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) David Chavez/Site Manager		Other Facility Data N. 36° 44' 12.18" W. -108° 20' 00.92" SIC 3271 Sector E
Name, Address of Responsible Official/Title/Phone and Fax Number Thomas Link, President, Southwest Building Blocks, Inc., 522 S. Miller Avenue, Farmington, New Mexico 87401 / President / 505-325-5064 and fax 325-5065		Contacted Yes <input type="checkbox"/> No <input checked="" 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)

Southwest Building Blocks, Inc., is the operator of a concrete building blocks manufacturing facility does not have permit coverage under the USEPA NPDES industrial stormwater 2008 Multi-Sector General Permit (MSGP).

Name(s) and Signature(s) of Inspector(s) DANIEL VALENTA /s/Daniel Valenta	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2575	Date 10/20/2011
Signature of Management QA Reviewer RICHARD E. POWELL /s/Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 10/20/2011

**Southwest Building Blocks
Compliance Evaluation Inspection
October 19, 2011**

Further Explanation

Introduction

On October 12, 2011, a Compliance Evaluation Inspection (CEI) was conducted at the Kirtland Southwest Building Blocks Manufacturing Facility, 4343 Hwy 64, Kirtland New Mexico in San Juan County by Daniel Valenta 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 may discharge to the Coolidge Arroyo and thence to the San Juan River in the San Juan River Basin, Segment 20.6.4.401 of the State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC). Designated uses are public water supply, industrial water supply, irrigation, livestock watering, wildlife habitat, marginal coldwater aquatic life, secondary contact, and warmwater aquatic life. This segment has been assessed as not supporting marginal coldwater aquatic life, secondary contact and warmwater aquatic life.

Upon arrival at 1355 hours the inspector made introductions, stated the purpose of this inspection and presented credentials to Mr. David Chavez, Site Manager. The inspector and Mr. Chavez toured the facility. Following the tour, an on-site exit interview to discuss preliminary findings was conducted with Mr. Chavez. The inspector left the facility at approximately 1420.

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:

**Southwest Building Blocks
Compliance Evaluation Inspection
October 19, 2011**

- 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

A previous concrete building block manufacturing facility has been in operation at this site since 1997. Southwest Building Blocks bought the site and began using it to store blocks and material. The manufacturing line at the facility is only used when the other two lines at the Farmington, Miller Avenue facility cannot meet demand.

Various aggregate, iron oxide colorant (pigments) and surfactants are used in the manufacturing of concrete blocks on site. Other activities include outside storage and stockpiling of raw materials; concrete block cutting; 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), 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.

Southwest Building Blocks
NPDES Tracking No. NMU001770
October 19, 2011

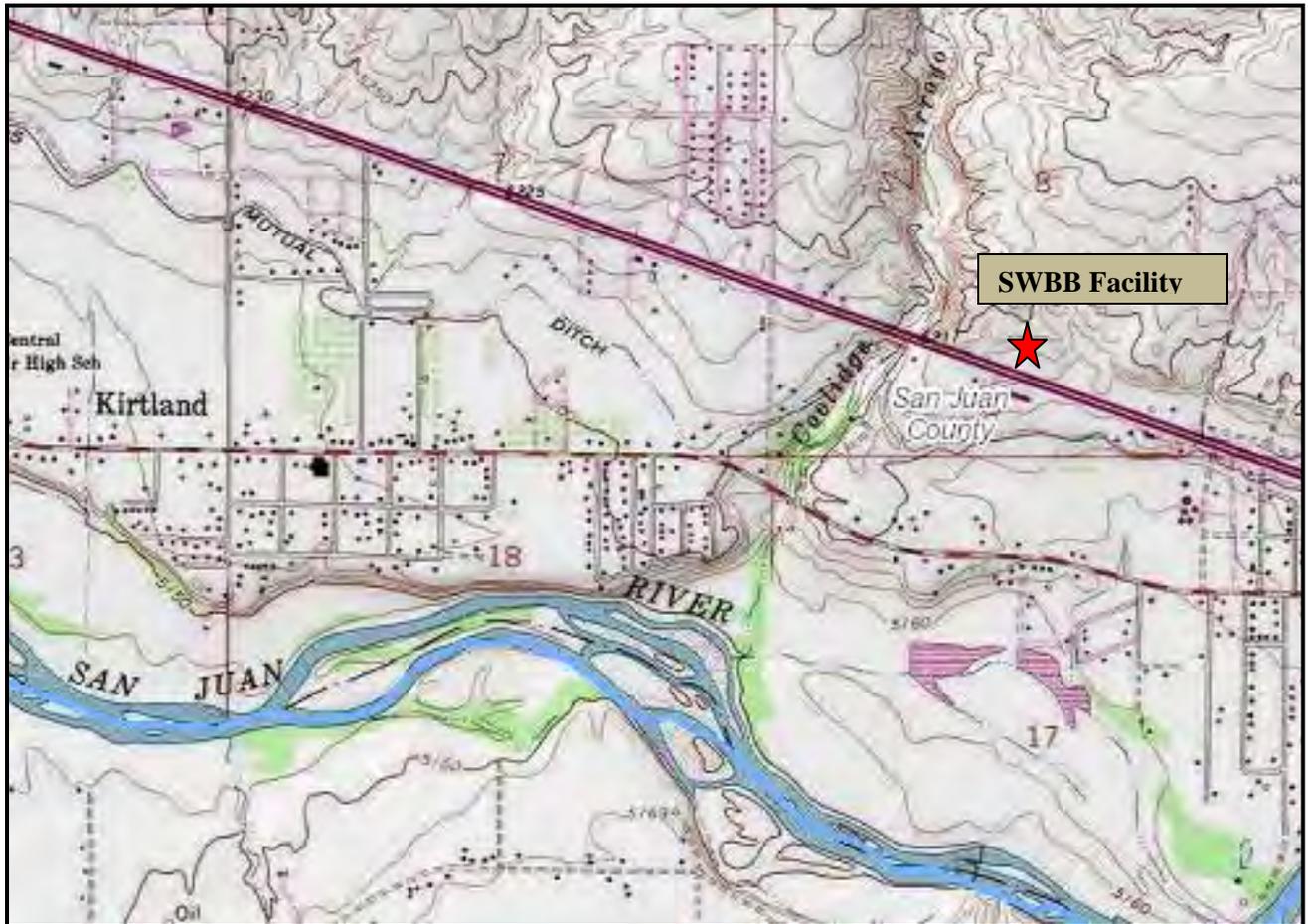
Findings

The operator did not obtain coverage under the USEPA 2008 MSGP when the permit became available. Generally, the site appeared to have good housekeeping practices for waste materials and garbage. There was no observed windblown trash or debris. Pollutant sources were stored outside exposed to rain, snow, snowmelt, and runoff including aggregate materials and broken blocks. There were no measures to control dust generation from the raw material aggregate stored on site, some solids tracking was observed. The process line for the manufacture of blocks is covered and not exposed to stormwater.

Inspections have been completed at their larger Farmington, Miller Avenue facility, NMU001747 and at Valley Scrap Metals which is next door to the Kirtland Southwest Building Blocks facility, NMU001769. Valley Scrap Metals is also owned by Mr. Tom Links.

**NMED/SWQB
Map of Area**

City/County: Kirtland/San Juan	
Location: 4343 Hwy 64, Kirtland, New Mexico	
Subject: Kirtland Southwest Building Blocks site is north of the San Juan River, west of the site is the Coolidge Arroyo.	



NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Daniel Valenta	Date: 10/12/2011	Time: 1406 hours
City/County: Kirtland/San Juan		
Location: 4343 Hwy 64, Kirtland, New Mexico		
Subject: Entrance to site with storage bins of materials and finished products.		



NMED/SWQB

Official Photograph Log

Photo # 2

Photographer: Daniel Valenta	Date: 10/12/2011	Time: 1406 hours
City/County: Kirtland/San Juan		
Location: 4343 Hwy 64, Kirtland, New Mexico		
Subject: Process line to produce blocks, drying racks.		

