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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARKLIN
Secretary

BUTCH TONGATE
Acting Deputy Secretary

Certified Mail - Return Receipt Requested

November 1, 2011

Mr. J.C. Tucker Jr., Owner
Salvage Plus Metal Recycling
4279 Hwy. 64
Kirtland, New Mexico 87417

RE: Industrial Storm Water; SIC 5093; NPDES Compliance Evaluation Inspection; Salvage Plus Metal Recycling; NPDES Permit NMU001771; October 12, 2011

Dear Mr. Tucker:

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



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 1 11 12 1 1 1 0 1 2 17 18 ~ 19 S 20 2					
Remarks					
S C R A P M E T A L R E C Y C L I N G					
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)	Entry Time /Date	Permit Effective Date
Salvage Plus Metal Recycling, 4279 Hwy 64, Kirtland, New Mexico 87417	1450 Hours / 10-12-2011	9-29-2008
San Juan County	Exit Time/Date	Permit Expiration Date
	1555/ 10-12-2011	9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
J.C. Tucker Jr. / Owner /505-598-6134 cell 970-259-4355	N. 36° 44' 16.83" W. -108° 20' 39.20"	
Name, Address of Responsible Official/Title/Phone and Fax Number	SIC 5093 Sector N	
J.C. Tucker Jr. /4279 Hwy 64, Kirtland, New Mexico 87417/ Owner/505-598-6134 cell 970-259-4355	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)

- At the time of this inspection Salvage Plus Metal Recycling did not have permit coverage under the USEPA NPDES industrial stormwater 2008 Multi-Sector General Permit (MSGP).
- Salvage Plus Metal Recycling applied for coverage shortly after this inspection, Permit Tracking Number NMR05HK35.
- Salvage Plus Metal Recycling had coverage under the 2000 USEPA NPDES industrial stormwater Multi-Sector General Permit (MSGP), NMR05B264.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
DANIEL VALENTA /s/Daniel Valenta	NMED/SWQB 505-827-2575	11/1/11
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
RICHARD E. POWELL /s/Richard Powell	505-827-2798	11/1/11

Salvage Plus Metal Recycling
NPDES Tracking No. NMU001771
October 12, 2011

Further Explanation

Introduction

On October 12, 2011, a Compliance Evaluation Inspection (CEI) was conducted at Salvage Plus Metal Recycling, 4279 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). Salvage Plus Metal Recycling is a Scrap Recycling and Waste Recycling facility (see Standard Industrial Classification (SIC) code 5093) that meets the description in Category 40 CFR 122.26(b)(14)(vi), and Sector N of the MSGP.

From Salvage Plus stormwater may discharge to the Coolidge Arroyo and thence to San Juan River. The Coolidge Arroyo discharge to the San Juan River in Segment 20.6.4.401 ID NM2401_10 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 a Total Maximum Daily Limit (TMDL) for Fecal coliform and E coli and has been assessed as not supporting marginal coldwater aquatic life, secondary contact and warmwater aquatic life.

Upon arrival at 1450 hours on October 12 the inspector made introductions, stated the purpose of the inspection and presented credentials to Mr. J. C. Tucker, Owner. The inspector briefly toured the facility. Following the tour, an on-site exit interview to discuss preliminary findings was conducted with Mr. Tucker. The inspector left the facility at approximately 1555 hours.

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. Common requirements for coverage under an industrial stormwater permit include development of a written stormwater pollution prevention plan (SWPPP), implementation of control measures, and submittal of a request for permit coverage, usually referred to as the Notice of Intent or NOI. The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implemented at your facility to minimize the discharge of these pollutants in runoff from the site.

Salvage Plus Metal Recycling
NPDES Tracking No. NMU001771
October 12, 2011

These control measures include site-specific best management practices (BMPs), maintenance plans, inspections, employee training, and reporting. The procedures detailed in the SWPPP must be implemented by the facility and updated as necessary, with a copy of the SWPPP kept on-site.

The industrial stormwater permit also requires collection of visual, analytical, and/or compliance monitoring data to determine the effectiveness of implemented BMPs. For more information on EPA's industrial stormwater permit go to www.epa.gov/npdes/stormwater and click on "Industrial Activity."

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 stormwater 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 stormwater. 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 stormwater management practices, where appropriate.

An industrial stormwater fact sheet for Sector N: Scrap Recycling and Waste Recycling 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_n_scraprecycling.pdf

Pollutants Associated With Material Stockpiling.

During material stockpiling, including the unloading and loading areas, the potential exists for some types of inbound recyclable materials to deposit residual fluids on the ground. Used automotive engines, radiators, brake fluid reservoirs, transmission housings, and lead-acid from batteries may contain residual fluids that, if not properly managed, can eventually come in contact with storm water runoff.

Another concern of outdoor stockpiling, including unloading and loading areas, is associated with deterioration of materials. Metal surfaces that are stockpiled for extended periods may be subject to corrosion. Corrosion is the deterioration of metal surfaces that typically results in the loss of metal to a solution, i.e., water.

Salvage Plus Metal Recycling
NPDES Tracking No. NMU001771
October 12, 2011

The following metals are referred to as the galvanic (or electromotive) series and have a tendency to corrode and become soluble in water; magnesium, aluminum, cadmium, zinc, steel or iron, cast iron, chromium, tin, lead, nickel, soft and silver solder, copper, stainless, steel, silver, gold, platinum, brass and bronze.

For some metals, the extent and rate of corrosion is dependent on whether it occurs in an oxygen-starved or oxygen-abundant atmosphere. Corrosion of stockpiled materials at scrap recycling facilities is a potential source of pollutants given that metals such as copper, lead, nickel, zinc, chromium and cadmium were frequently detected in sampling data. In addition, the majority of these metals are associated with recyclable materials handled by the scrap recycling industry.

Another significant material of concern is the acceptance and temporary storage of scrap lead acid batteries from automotive vehicles and equipment. If a battery casing becomes cracked or damaged, special precautions are necessary to ensure that the contents do not come in contact with storm water runoff. This includes battery terminals with visible corrosion. In all cases, used batteries should be handled and stored in such a manner as to prevent exposure to either precipitation or runoff

Findings

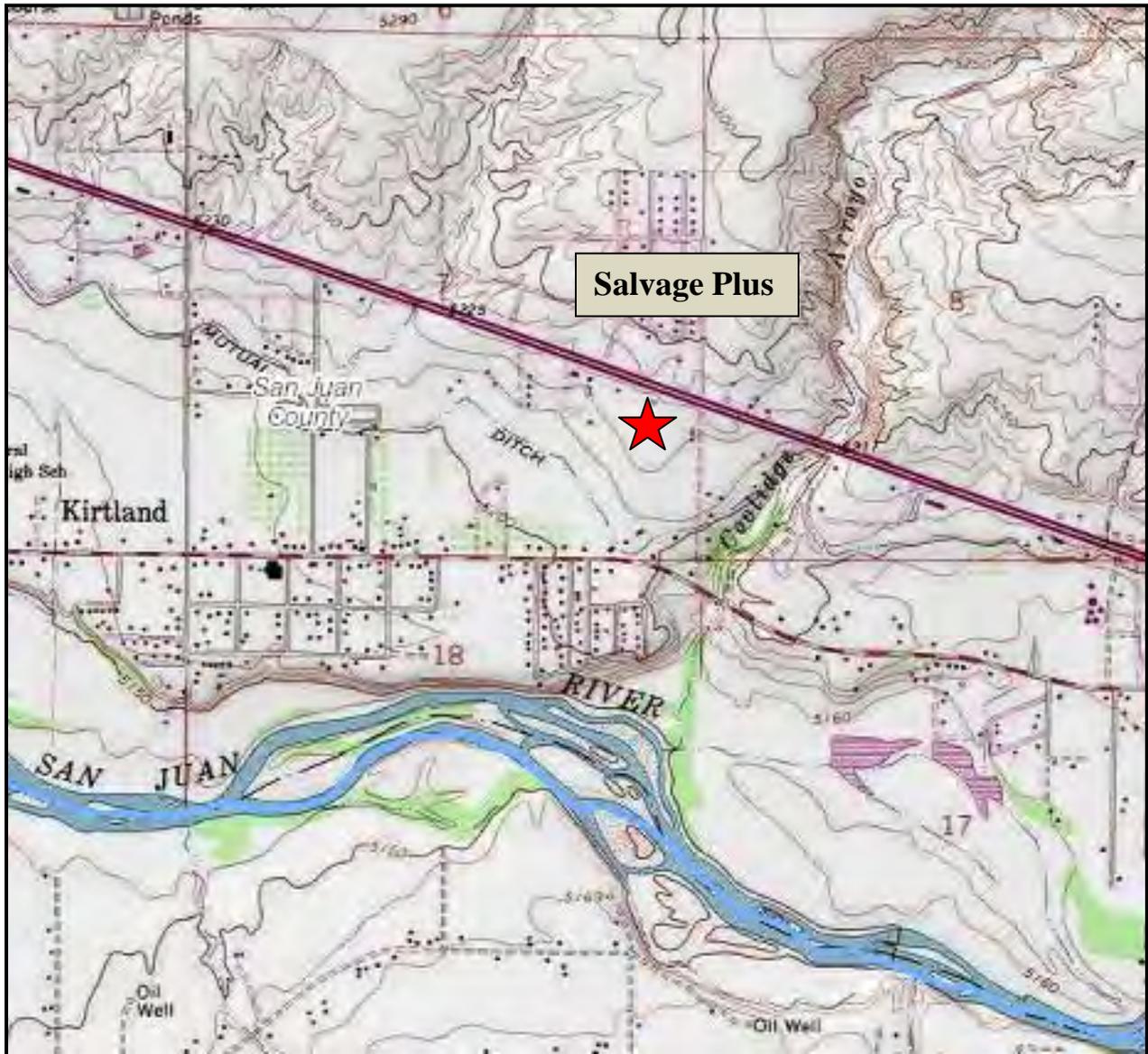
At the site a wide variety of materials are brought in to be sold and recycled. Some items observed were white goods, automotive rims and tires; radiators, see attached photos of assortment of items. Metal items were sorted into piles depending on the type of material, sorting involved cutting, crushing, and stacking.

- Salvage Plus Metal Recycling did not meet the requirement as an existing discharger to file an NOI by the required deadline of January 5, 2009.
- Salvage Plus Metal Recycling had coverage under the 2000 USEPA NPDES industrial stormwater Multi-Sector General Permit (MSGP), NMR05B264. However no SWPPP or inspection reports were available for review under the expired permit.
- The new NOI filed on 10/25/2011, NMR05HK35, incorrectly notes this segment of the San Juan is not impaired. This segment of the river is impaired and has a TMDL for E coli and Fecal coliform, see details in the introduction section above.

The site slopes toward the south, towards the river. Hwy 64 in front of the business drains towards the site, (see photo 1). The 4 acre site has a small sand berm at the back of the property (see photo 2). At both back corners of the property there appears to be small unmaintained containment ponds. These have been partially filled in by blowing sand. It is unknown when these Best Management Practices (BMP's) were installed. During the writing of this report the Inspector was contacted by a stormwater consultant who has been contracted to review the site and develop a SWPPP. An NOI was filed on 10/25/2011 with coverage beginning on 11/24/2011, NMR05HK35.

**NMED/SWQB
Map of Area**

City/County: Kirtland/San Juan	
Location: 4279 Hwy 64, Kirtland, New Mexico	
Subject: The Salvage Plus Metal Recycling yard is north of the San Juan River, east of the site is Coolidge Arroyo.	



**NMED/SWQB
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 10/12/2011	Time: 1510 hours
City/County: Kirtland/San Juan		
Location: Salvage Plus Metal Recycling, 4279 Hwy 64, Kirtland, New Mexico, facing north.		
Subject: Main entrance road into the salvage yard, note slope is inward.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 10/12/2011	Time: 1532 hours
City/County: Kirtland/San Juan		
Location: Salvage Plus Metal Recycling, 4279 Hwy 64, Kirtland, New Mexico, facing east.		
Subject: At the back of property is an unmaintained berm.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 10/12/2011	Time: 1514 hours
City/County: Kirtland/San Juan		
Location:	Salvage Plus Metal Recycling, 4279 Hwy 64, Kirtland, New Mexico, facing south.	
Subject:	Looking across the property, north to south, various sorting, crushing, and cutting activities.	

