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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

January 25, 2012

Gabriela Martinez/Alberto Barraza
Owners
South Valley Metals
1540 Bridge Blvd SW
Albuquerque, New Mexico 87105

RE: Industrial Storm Water; SIC 5093; NPDES Compliance Evaluation Inspection; South Valley Metals; NMU001784; January 4, 2012

Dear Gabriela Martinez/Alberto Barraza:

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 I 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 8 4 11 12 1 2 0 1 0 4 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) South Valley Metals, 2327 2nd. Street SW, Albuquerque, NM 87105 Bernalillo County | Entry Time /Date 1418 Hours / 1-4-2011 | Permit Effective Date 9-29-2008 |
| | Exit Time/Date 1440/ 1-4-2011 | Permit Expiration Date 9-29-2013 |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Alberto Barraza/Owner/ 505-907-5476 | Other Facility Data N. 35° 03' 33.10" W. -106° 39' 13.36" | |
| Name, Address of Responsible Official/Title/Phone and Fax Number Gabrieia Martinez & Alberto Barraza, 1540 Bridge Blvd SW, Albuquerque, New Mexico/Owners/ 505-907-5476 | Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | SIC 5093 Sector N |

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 |
| U | 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 South Valley Metals 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 1/25/2012 |
| Signature of Management QA Reviewer RICHARD E. POWELL /s/Richard Powell | Agency/Office/Phone and Fax Numbers 505-827-2798 | Date 1/25/2012 |

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Further Explanation

Introduction

On January 4, 2012, a Compliance Evaluation Inspection (CEI) was conducted at South Valley Metals, 2327 2nd Street SW, Albuquerque, New Mexico in Bernalillo 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). South Valley Metals 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.

Upon arrival at 1418 hours on January 4, the inspector made introductions, stated the purpose of the inspection and presented credentials to Alberto Barraza, Owner. The inspector briefly toured the facility. Following the tour, an on-site exit interview to discuss preliminary findings was conducted with Mr. Barraza. The inspector left the facility at approximately 1440 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.

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.

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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.

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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, and electric appliances. See attached photos of assortment of items. Metal items were sorted into piles depending on the type of material. Sorting the materials involved cutting, crushing, and stacking.

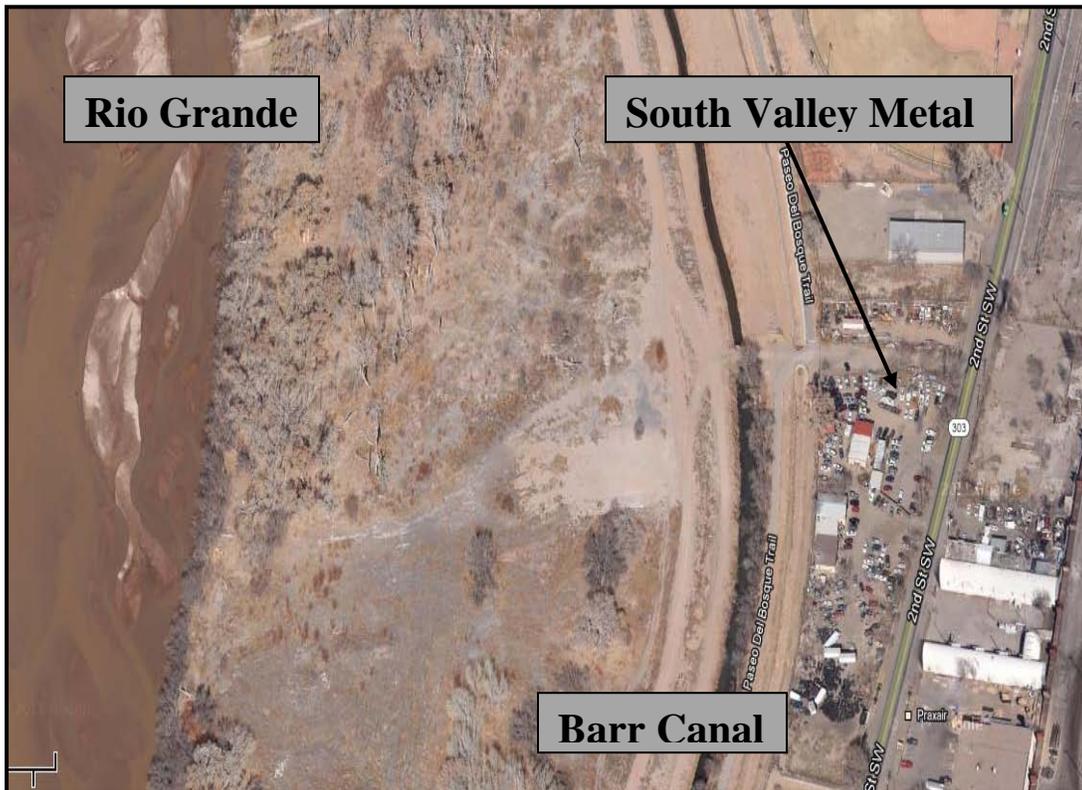
This small, less than a half acre site is set up for customers to drive in, unload and drive out. Material is then separated and piled up. As the yard fills a wholesale recycler is called who takes the material offsite. Although not a large site, the majority of the collected material is exposed to stormwater. It appears the site in the past may have been an auto salvage yard/auto repair business.

BMP's have been constructed and are still present at the site although the present owner appeared unaware of their purpose. On the north side of the yard is a sediment pond that may contain most of the stormwater falling on the site and most of the run on, (see photo 4). Mr. Barraza said that during a rain event the depression will fill up. The back of the property leading to the river has a small berm present that has not been maintained and may be breached. The manager did not know it was there or its purpose. Batteries, copper wire, and brass are stored in a shipping container that can be locked and out of the weather.

There are some structural BMP's in place which will aid the manager in meeting the requirements of the MSGP; however, knowledge of the permit requirements and maintenance and evaluation of BMP's will be required. Due to the close proximity of the river and irrigation canal there is a high potential for the release of contaminated stormwater if these measures fail.

**NMED/SWQB
Map of Area**

| | |
|--|--|
| City/County: Albuquerque/Bernalillo | |
| Location: 42327 2 nd Street SW, Albuquerque, New Mexico | |
| | |



**NMED/SWQB
Official Photograph Log**

Photo # 1

| | | |
|--|----------------|------------------|
| Photographer: Daniel Valenta | Date: 1/4/2012 | Time: 1421 hours |
| City/County: Albuquerque/Bernalillo | | |
| Location: South Valley Metals, 2327 2 nd Street SW, Albuquerque, New Mexico, facing west. | | |
| Subject: Entrance to storage yard, loading/unloading zone. | | |



**NMED/SWQB
Official Photograph Log**

Photo # 2

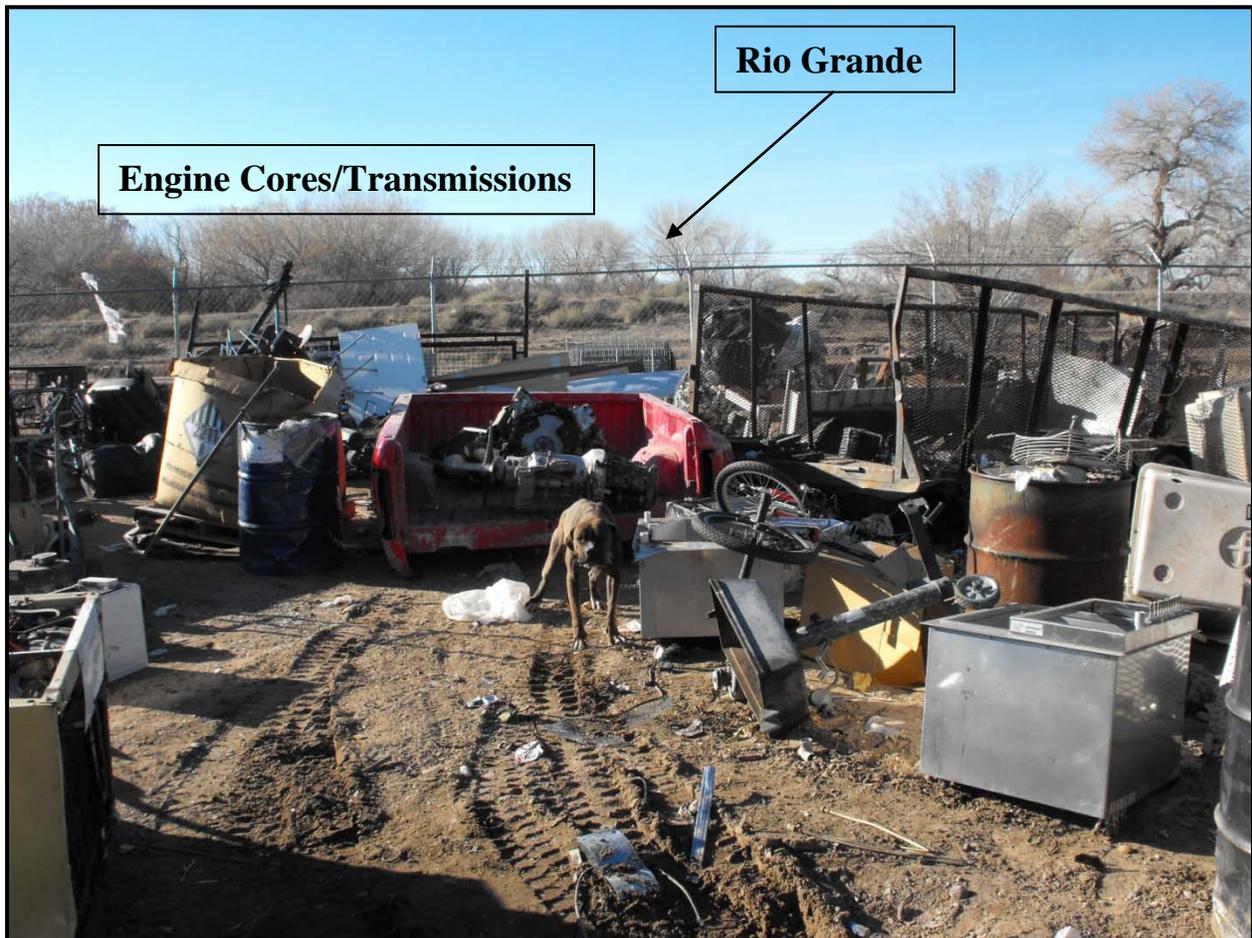
| | | |
|---|----------------|------------------|
| Photographer: Daniel Valenta | Date: 1/4/2012 | Time: 1436 hours |
| City/County: Albuquerque/Bernalillo | | |
| Location: South Valley Metals, 2327 2 nd Street SW, Albuquerque, New Mexico, facing southwest. | | |
| Subject: Scrap storage yard, oil and grease spills, debris, and waste material of various sorts. | | |



**NMED/SWQB
Official Photograph Log**

Photo # 3

| | | |
|---|----------------|------------------|
| Photographer: Daniel Valenta | Date: 1/4/2012 | Time: 1439 hours |
| City/County: Albuquerque/Bernalillo | | |
| Location: South Valley Metals, 2327 2 nd Street SW, Albuquerque, New Mexico, facing west. | | |
| Subject: Scrap storage yard, oil and grease spills, debris, and waste material of various sorts, and an insane dog. | | |



**NMED/SWQB
Official Photograph Log**

Photo # 4

| | | |
|--|----------------|------------------|
| Photographer: Daniel Valenta | Date: 1/4/2012 | Time: 1434 hours |
| City/County: Albuquerque/Bernalillo | | |
| Location: South Valley Metals, 2327 2 nd Street SW, Albuquerque, New Mexico, facing west. | | |
| Subject: Unmaintained containment pond. | | |

