



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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Deputy Secretary

JAMES H. DAVIS, Ph.D.  
Director  
Resource Protection Division

**Certified Mail - Return Receipt Requested**

October 25, 2012

Mr. Matt Allen, Owner  
Wood You Recycle  
P.O. Box 3131  
Milan, New Mexico 87021

**RE: Industrial Storm Water; SIC 2499; NPDES Compliance Evaluation Inspection; Wood You Recycle; NPDES Permit NMU001805; October 3, 2012**

Dear Mr. Allen:

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: Carol Peters-Wagnon, EPA by e-mail  
Diana McDonald, EPA by e-mail  
Hannah Branning, EPA by e-mail  
Rashida Bowlin, EPA by e-mail  
Darlene Whitten-Hill, EPA, by e-mail  
NMED District I 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 8 0 5 11 12 1 2 1 0 0 3 17 18 ~ 19 S 20 2					
Remarks T I M B E R P R O D U C T 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)	Entry Time /Date	Permit Effective Date
Wood You Recycle, 4201 Williams S.E., Albuquerque, New Mexico 87105	1045/ 10-3-2012	9-29-2008
Bernalillo County	Exit Time/Date	Permit Expiration Date
	1125/ 10-03-2012	9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number	Other Facility Data	
Mr. Brett Kramer/ Manager/505-270-8093	N. 35° 01' 10.00" W. -106 °39' 30.26"	
Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted	SIC 2499 Sector A
Mr. Matt Allen, P.O. Box 3131, Milan, New Mexico/ 87021/Company President/ 505-287-9469 ex 2	Yes <input 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
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)

- Inspector arrived on site at 1045 on 10/3/2012, conducted entrance interview with Mr. Brett Kramer, during which the Inspector made introductions, showed credentials and explained the purpose of the inspection.
- Wood You Recycle is a division of Mt. Taylor Millworks, Inc. a Milan-based company, see NMU001767.
- This report is based on a review of the files maintained by the permittee and NMED, on-site observations by NMED personnel, and verbal information provided by the facility's representative.
- An exit interview to discuss the preliminary finding of the inspection was conducted at approximately 1125 on 10/3/2012 with Mr. Brett Kramer at the site.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
DANIEL VALENTA /s/Daniel Valenta	NMED/SWQB 505-827-2575	10/25/2012
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
RICHARD E. POWELL /s/Richard Powell	505-827-2798	10/25/2012

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**Further Explanations**

**Introduction**

On October 3, 2012, a Compliance Evaluation Inspection (CEI) was conducted at the business Wood You Recycle by Daniel Valenta and Sandra Gabaldon 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 NPDES permit requirements for stormwater discharges associated with industrial activity under 40 Code of Federal Regulations (CFR) 122.26(b)(14) and the industrial stormwater Multi-Sector General Permit (MSGP).

Upon arrival at 1045 hours on October 3, 2012 the inspector made introductions, stated the purpose of the inspection and presented credentials to Mr. Brett Kramer, Facility Manager. The inspector toured the facility. An on-site exit interview to discuss preliminary findings was conducted with Mr. Kramer. The inspector left the facility at approximately 1125 hours on the day of the inspection.

Stormwater from this site may discharge to the Albuquerque MS4 thence to the Rio Grande in the Rio Grande Basin, Segment 20.6.4.105 of the State of New Mexico Standards for Interstate and Intrastate Surface Waters, New Mexico Administrative Code (NMAC). Designated uses are irrigation, marginal warm water aquatic, livestock watering, public water supply, wildlife habitat, and primary contact.

**On-site Industrial Activity Description**

Wood You Recycle opened for business in 2007 and has 4 employees. The facility buys and collects clean wood waste; this material is then ground up on site and shipped to Mt. Taylor Machine, LLC, a wood pellet manufacturing company just outside Milan, New Mexico. Since opening the facility, it has processed approximately 10 to 12 million pounds of wood waste per year, which is then converted into burning wood pellets. No chemicals are used at the facility in the processing of their scrap wood.

The facility produces sawdust, this is stored in an outdoor bin, (see photo 1). This material is exposed to stormwater. Pollutants resulting from lumber and residue generation and storage activities are typically conventional in nature. Low pH levels can result from the leachate of decaying organic materials. TSS and BOD5 may be elevated in this leachate. In addition to leachate, washed away residue particles contribute to TSS loadings. Equipment and machinery at the facility site may result in the discharge of oil and grease.

The site is on a fairly flat area with a slight slope to the northwest. On the west side of the property are the storage area and grinding operation. Just outside the property on the west side is an elevated train track bed that acts as a barrier. The northwest corner of the property appeared to be the low point of the site. Erosion rills could be seen in this area where stormwater exits the property, (see photo 2). There is a culvert through the railroad bed toward the public streets.

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**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.

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](http://www.epa.gov/npdes/stormwater) and click on “Industrial Activity.”

An industrial stormwater fact sheet for Sector A: Timber Products 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](http://www.epa.gov/npdes/pubs/sector_n_scraprecycling.pdf)

A SWPPP should include the following information:

- **A description of potential pollutant sources** – 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

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- **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.

**Finding**

**Wood You Recycle does not have permit coverage and has not prepared the required documents to file for and receive a permit.**

As of the time of the inspection the facility does not have an active MSGP. Per Table 1.2 of the permit NOI Submittal Deadlines/Discharge Authorization Dates, new dischargers or new sources that commenced discharging between October 30, 2005 and January 5, 2009 must submit an NOI as soon as possible but no later than January 5, 2009.

**NMED/SWQB  
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 10/3/2012	Time: 1105 hours
City/County: Albuquerque/Bernalillo		
Location: 4201 Williams SE, Albuquerque, New Mexico, facing north.		
Subject: Black pile of decaying wood material, holding bin for new sawdust, pile of raw material.		



**NMED/SWQB  
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 10/3/2012	Time: 1122 hours
City/County: Albuquerque/Bernalillo		
Location: 4201 Williams SE, Albuquerque, New Mexico, facing northwest corner of property.		
Subject: Stormwater falling on the site flows toward the northwest corner.		

