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Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Surface Water Quality Bureau

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DAVE MARKLIN
Secretary

BUTCH TONGATE
Deputy Secretary

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

Certified Mail - Return Receipt Requested

October 29, 2012

Mr. Mel Watkins Jr., Vice President
Riteway Pallet MFG Co,
3524 Broadway S.E.
Albuquerque, New Mexico 87105

RE: Industrial Storm Water; SIC 2448; NPDES Compliance Evaluation Inspection; Riteway Pallet MFG Company; NPDES Permit NMU001806; October 3, 2012

Dear Mr. Watkins:

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 6 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 1400/ 10-3-2012	Permit Effective Date 9-29-2008
Riteway Pallet MFG Co., 3524 Broadway S.E., Albuquerque, NM 87105 Bernalillo County	Exit Time/Date 1456/ 10-03-2012	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number	Other Facility Data	
Mr. Mel Watkins, Jr./Vice President/505-842-5054/888-238-5534 fax 505-842-6532	N. 35° 02' 12.77" W. -106° 38' 41.08"	
Name, Address of Responsible Official/Title/Phone and Fax Number	SIC 2448 Sector A	
Mr. Mel Watkins, Jr./ 3524 Broadway S.E., Albuquerque, NM 87105/Vice President/505-842-5054/888-238-5534 fax 505-842-6532	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
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 1400 on 10/3/2012, conducted entrance interview with Mr. Mel Watkins, Jr., during which the Inspector made introductions, showed credentials and explained the purpose of the inspection
- 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 1456 on 10/3/2012 with Mr. Mel Watkins, Jr. 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	10/29/2012
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
BRUCE YURDIN /s/Bruce Yurdin	505-827-2795	10/29/2012

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Further Explanations

Introduction

On October 3, 2012, a Compliance Evaluation Inspection (CEI) was conducted at the Riteway Pallet MFG Company business 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 1400 hours on October 3, 2012 the inspector made introductions, stated the purpose of the inspection and presented credentials to Mr. Mel Watkins, Jr., Vice President. The inspector toured the facility. An on-site exit interview to discuss preliminary findings was conducted with Mr. Mel Watkins, Jr. The inspector left the facility at approximately 1456 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

Riteway Pallet Manufacturing Co., Inc. builds new pallets from scratch as well as stripping and disassembling old pallets to recover all the reusable lumber to be used to build new pallets. New pallets are made from two basic types of lumber: hardwood or softwood. The saw dust generated by the process is recovered with a saw dust recovery system that captures the dust from all related machinery. Non-Standard and un-repairable pallets are run through dismantling machines where all salvageable wood is removed, inspected and re-cut for reuse. All of the facilities unusable scrap lumber is recycled into burning wood stove pellets. The facility currently employe's from 40 to 45 people for its operation and is the largest in the state. It is a family owned business in operation since 1990.

Much of the facility's assembly process is outdoors, under a roof but exposed on the sides. Finished products and used pallets are stored outdoors (see photo 2-4). The site slopes from east to west, towards Broadway Blvd. On the west side is a raised railroad bed which acts as a barrier to stormwater flowing onto the property. Stormwater falling on the property flows to the east or southeast to discharge along Broadway Blvd, (see photo 3-5).

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.

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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 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

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

Riteway Pallet MFG. Co. does not have permit coverage and has not prepared the required documents to file for and receive a permit. You are encouraged to review the permit, complete your SWPPP and apply for coverage under the eNOI system.

The deadline for a facility to be covered under the 2008 MSGP per Table 1.2 which outlines NOI Submittal Deadlines/Discharge Authorization Dates. “Eligible Dischargers in operation prior to October 30, 2005, but not covered under the 2000 MSGP or another NPDES permit. NOI submission deadlines, immediately, to minimize the time discharges from the facility will continue to be unauthorized.”

NMED/SWQB
Site Overview

City/County:	Albuquerque/Bernalillo	
Location:	3524 Broadway S. E., Albuquerque, New Mexico 87105.	
Subject:	Overview of Riteway Pallets MFG, Co. Inc. Discharge point in photos below.	



**NMED/SWQB
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 10/3/2012	Time: 1421 hours
City/County: Albuquerque/Bernalillo		
Location: 3524 Broadway S. E., Albuquerque, New Mexico 87105, facing east.		
Subject: Raw lumber being brought in, oil containers, broken or salvage equipment.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 10/3/2012	Time: 1418 hours
City/County: Albuquerque/Bernalillo		
Location: 3524 Broadway S. E., Albuquerque, New Mexico 87105, facing south.		
Subject: Assemble line and storage of new/rebuilt pallets.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 10/3/2012	Time: 1434 hours
City/County: Albuquerque/Bernalillo		
Location :	3524 Broadway S. E., Albuquerque, New Mexico 87105, facing south.	
Subject:	South side of facility drains to this point to discharge to Broadway Blvd.	



**NMED/SWQB
Official Photograph Log**

Photo # 4

Photographer: Daniel Valenta	Date: 10/3/2012	Time: 1437 hours
City/County: Albuquerque/Bernalillo		
Location: 3524 Broadway S. E., Albuquerque, New Mexico 87105, facing east.		
Subject: One discharge point onto Broadway Blvd from the site.		



**NMED/SWQB
Official Photograph Log**

Photo # 5

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, facing south.	
Subject:	One discharge point onto Broadway Blvd from the site.	

