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JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Deputy Secretary

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

**Certified Mail – Return Receipt Requested**

October 25, 2012

Mr. Ken Hakes, Chief Operating Officer  
Superlite – An Oldcastle® Company  
4150 W. Turney Avenue  
Phoenix, AZ 85019

**RE: Industrial Stormwater Inspection; SIC 3721; NPDES Compliance Evaluation  
Inspection; Superlite – an Oldcastle® Company; NPDES Permit NMU001810 ;  
October 17, 2012**

Dear Mr. Hakes:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB), 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 the requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanation section of the inspection report. You are encouraged to review the inspection report and required to correct any problems noted during the inspection and 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 Avenue, Dallas Texas 75202) and NMED (at the address above) regarding modifications and compliance issues.

The NPDES Stormwater Multi-Sector General Permit (MSGP) for industrial activities was re-issued on September 29, 2008. The MSGP, fact sheet and other information in the industrial stormwater program can be accessed at <http://cfpub2.epa.gov/npdes/stormwater/msgp.cfm>.

Superlite  
Page -2-  
October 25, 2012

If you have any questions about this inspection report, please do not hesitate to contact me at (505) 827-1041.

Sincerely,

*/s/ Sandra Gabaldón*

Sandra Gabaldón  
Surface Water Quality Bureau

Cc: Carol Peters-Wagnon, (6EN-WM), USEPA, by email  
Rashida Bowlin, (6EN-AS), USEPA, by email  
Diana McDonald, (6EN-WM), USEPA, by email  
Hannah Branning, (6EN-WC), USEPA, by email  
Darlene Whitten-Hill, (6EN-AS), USEPA, by email  
District I, NMED, by email



### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="U"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="1"/> <input type="text" value="8"/> <input type="text" value="1"/> <input type="text" value="0"/> 11 <input type="text" value="1"/> 12 <input type="text" value="2"/> <input type="text" value="1"/> <input type="text" value="0"/> <input type="text" value="1"/> <input type="text" value="7"/> 17			18 <input type="text" value="~"/>	19 <input type="text" value="S"/>	20 <input type="text" value="2"/>
Remarks					
<input type="text" value="C"/> <input type="text" value="O"/> <input type="text" value="N"/> <input type="text" value="C"/> <input type="text" value="R"/> <input type="text" value="E"/> <input type="text" value="T"/> <input type="text" value="E"/> <input type="text" value="B"/> <input type="text" value="L"/> <input type="text" value="O"/> <input type="text" value="C"/> <input type="text" value="K"/> <input type="text" value="S"/> <input type="text" value="E"/> <input type="text" value="C"/> <input type="text" value="T"/> <input type="text" value="O"/> <input type="text" value="R"/> <input type="text" value="E"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69	70 <input type="text"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text"/>	74 <input type="text"/> 75 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 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) SuperliteBlock – an Oldcastle® Company 6140 Second Street, NW Albuquerque, NM 87120  BERNALILLO COUNTY	Entry Time /Date 1320 Hours – 10/17/2012	Permit Effective Date 9-29-2008
	Exit Time/Date 1425 Hours - 10/17/2012	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Fabian Campas, Production Manager (505) 345-4451 / Fax (505) 345-4459	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Ken Hakes, Chief Operating Officer Superlite Block 4150 W. Turney Avenue Phoenix, AZ 85019	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	GPS: N. 35.14547° W. -106.63314°  Sector E SIC 3721

#### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="text" value="U"/> Permit	<input type="text" value="N"/> Flow Measurement	<input type="text" value="S"/> Operations & Maintenance	<input type="text" value="N"/> CSO/SSO
<input type="text" value="U"/> Records/Reports	<input type="text" value="N"/> Self-Monitoring Program	<input type="text" value="N"/> Sludge Handling/Disposal	<input type="text" value="N"/> Pollution Prevention
<input type="text" value="S"/> Facility Site Review	<input type="text" value="N"/> Compliance Schedules	<input type="text" value="N"/> Pretreatment	<input type="text" value="N"/> Multimedia
<input type="text" value="N"/> Effluent/Receiving Waters	<input type="text" value="N"/> Laboratory	<input type="text" value="M"/> Storm Water	<input type="text"/> Other:

#### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldón /s/ Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041 / (505) 827-0160	Date
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB/ (505) 827-2798 / (505) 827-0160	Date

**Superlite Block – an Oldcastle® Company**  
**NPDES Compliance Evaluation Inspection**  
**NPDES Permit NMU001810**  
**Inspection Date: October 17, 2012**

**Introduction:**

On October 17, 2012, a Compliance Evaluation Inspection (CEI) was conducted at Superlite Block – an Oldcastle® Company, 6140 Second Street, NW; Albuquerque, New Mexico in Bernalillo County by Sandra Gabaldón, accompanied by Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The purpose of this inspection is to document the facility's status regarding the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges associated with industrial activities under 40 CFR 122.26 and the industrial stormwater Multi-Sector General Permit (MSGP). Superlite Block is a concrete block manufacturer (see Standard Industrial Classification [SIC] code 3721) that meets the description in Sector E of the MSGP.

Upon arrival at 1320 hours on October 17, 2012, the inspector met with Fabian Campas, Production Manager. Ms. Gabaldón presented her credentials, and explained the purpose of the inspection. The inspectors then toured the facility with Mr. Campas. Following the tour, an exit interview was held with Mr. Campa to discuss the preliminary findings.

This report is based on review of EPA's on-line notice of intent (NOI) database and on-site observation by NMED personnel along with verbal information provided by Mr. Campas.

**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, 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 on September 29, 2008, (Federal Register/Vol. 73, No. 189/Monday, September 29, 2008 pg. 56572). This replaced the 2000 MSGP which expired on October 30, 2005. Common requirements for coverage under an industrial stormwater permit include the development of a written stormwater pollution prevention plan (SWPPP), implementation of best management practices (BMPs), and submittal of a Notice of Intent (NOI). The SWPPP includes a written assessment of potential sources of pollutants in stormwater runoff and includes best management practices that will be implemented to minimize such pollutants from discharging from your facility.

The plan also requires a site map, 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 to be kept on-site.

The MSGP also requires monitoring to include visual and analytical data to determine the effectiveness of BMPs on site. For further information regarding the NPDES MSGP please visit EPA's website: [www.epa.gov/npdes/stormwater](http://www.epa.gov/npdes/stormwater) and click on "industrial activity." Once you navigate to the MSGP on

the website, you will also find various Fact Sheets for industrial activities. Concrete block manufacturing falls under Sector E. The Fact Sheet will provide further information regarding pollutants and requirements of the MSGP.

Concrete block manufacturers combine cement, aggregate and water to form concrete. Aggregate generally consists of sand, gravel or crushed stone. Admixtures may include fly ash, calcium chloride, calcium salt, fatty acid glyceride and styrene copolymer or vinyl acetate may be added to obtain desired characteristics such as slower or more rapid curing times.

Potential sources of pollutants in stormwater from discharges associated with concrete block manufactures include: TSS, pH, COD, potassium, sulfate, lead, iron zinc and oil and grease. These pollutants are associated with the storage of materials exposed to stormwater. Superlite does not do any vehicle maintenance on-site. The site does have diesel gasoline stored in secondary containment and has a SPCC plan in place.

### **Findings:**

Your facility does not have permit coverage for the industrial activities associated with the manufacturing of concrete block. You are encouraged to review the permit, complete your SWPPP and apply for coverage under the eNOI system.

Although you do not have coverage, it is noted that the facility has begun to put together a SWPPP which was presented to the inspectors during the inspection. The facility also has constructed a retention pond on the northeast corner of the property. The retention pond will retain stormwater within the pond with no discharge except for when extreme rainfall events occur. The water collected in the retention pond either evaporates or infiltrates.

The property is well maintained and orderly. There are numerous stacks of block kept outside. All manufacturing occurs inside. Aggregate is stored outside in various distribution bins. The proportioned cement, aggregate, and admixtures are fed into an automatic block molding machine that presses the mixture into its final form. The blocks are stacked on iron framework racks where they cure of a number of hours.

On the north side of the property is a metal recycler which has a large amount of recyclable material. There may be some run-on from this facility that may impact Superlite's analytical samples, if and when they do sample.

NMED/SWQB  
Official Photograph Log  
Photo #1

Photographer: Daniel Valenta	Date: October 17, 2012	Time: 1416 Hours
City/County: Albuquerque / Bernalillo		
Location: Superlite Block, 6140 2 <sup>nd</sup> Street, NW; Albuquerque, NM		
Subject: Retention Basin on northeast side of property.		

