



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

Harold Runnels Building, N2050  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, NM 87502-5469  
Phone (505) 827-0187 Fax (505) 827-0160  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)



DAVE MARTIN  
Secretary

BUTCH TONGATE  
Deputy Secretary

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

**Certified Mail – Return Receipt Request**

November 8, 2012

Mr. Edward Luna, Owner  
Rio Rancho Iron Works  
412 Frontage Road, NE  
Suite #C  
Rio Rancho, New Mexico 87124

**RE: Industrial Stormwater Inspection; SIC 3446; NPDES Compliance Evaluation Inspection; Rio Rancho Iron Works; NPDES Permit NMU001815 ; October 31, 2012**

Dear Mr. Luna:

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>.

Rio Rancho Iron Works

Page -2-

November 8, 2012

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

Sincerely,

*/s/ Sandra Gabaldon*

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



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   8   1   5   11   12   1   2   1   0   3   1   17   18   ~   19   S   20   2					
Remarks					
A   R   C   H   I   T   E   C   T   U   R   A   L   /   O   R   N   A   M   E   N   T   A   L     W   O   R   K					
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) RIO RANCHO IRON WORKS, INC. 412 Frontage Road, NE Rio Rancho New Mexico 87124  BERNALILLO COUNTY	Entry Time /Date 1130 Hours / 10-31-2012	Permit Effective Date 9-29-2008
	Exit Time/Date 1155 Hours – 10/31/2012	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Rachelle Anaya, Business Manager / (505) 994-0776 / (505) 994-0545	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Edward Luna, Owner / (505) 994-0776 / (505) 994-0545 412C Frontage Road, NE Highway 528 Rio Rancho, NM 87124	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	GPS: N. 35°15'49.11" W. -106°37'51.69"  SECTOR AA SIC 3446

#### Section C: Areas Evaluated During Inspection

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

U	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	N	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		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 11-08-2012
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 11-08-2012

**Rio Rancho Iron Works, Inc.**  
**NPDES Compliance Evaluation Inspection**  
**NPDES Permit NMU001815**  
**Inspection Date: October 31, 2012**

**Introduction:**

On October 31, 2012, a Compliance Evaluation Inspection (CEI) was conducted at Rio Rancho Iron Works, 412 Frontage Road, Rio Rancho, New Mexico in Bernalillo County by Sandra Gabaldón 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). Rio Rancho Iron Works is classified as architectural and ornamental metal work (see Standard Industrial Classification [SIC] code 3446) that meets the description in Sector AA of the MSGP.

Upon arrival at 1130 hours on October 31, 2012, the inspector met with Ms. Rachele Anaya, Business Manager. The inspector, Ms. Gabaldón, presented her credentials, and explained the purpose of the inspection. The inspector informed Ms. Anaya of the requirements of the Multi-Sector General Permit (MSGP). Ms. Anaya stated that she was not aware of the Multi-Sector General Permit. However, when Ms. Gabaldón returned to the office and researched Rio Rancho Iron Works further, it was discovered that Rio Rancho Iron Works was previously inspected on December 3, 2010, by Ms. Sarah Holcomb. This is a second inspection this facility has undergone. During the December 3, 2010 inspection, Ms. Holcomb met with Mr. Luna, owner and Ms. Anaya, Business Manager. (Please see attached inspection report).

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 Ms. Anaya.

**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 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 (NOI). The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implanted at your facility to minimize the discharge of these pollutants in runoff from the 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. Architectural and Ornamental Metal Work falls under Sector AA. The Fact Sheet will provide further information regarding pollutants and requirements of the MSGP.

There are a number of factors that influence to what extent fabricated metal products can affect water quality. Some of these factors include: geographic location, topography, hydrogeology, extent of impervious surfaces, type of ground cover, outdoor activities, the size of your facility, and the type and duration of precipitation events.

Some common activities, pollutant sources and pollutants that may be associated with this include:

Activity	Pollutant Source	Pollutants
Tool workpiece interface/shaving, chipping	Used metal working fluid with fine metal dust	Total suspended solids (TSS), chemical oxygen demand (COD), oil and grease
Parts/tools cleaning, sand blasting, metal surface cleaning, removal of applied chemicals	Solvent cleaners, abrasive cleaners, alkaline cleaners, acid cleaners, rinse waters	Spent solvents, TSS, acid, alkaline waste, oil
Making structural components	Cutting, scraps, turnings, fines	Paints, spent solvents, heavy metals, TSS
Painting operations	Paint and paint thinner spills, sanding, spray painting. Empty containers, paint application wastes, spills, over spraying, storage areas	Paints, spent solvents, heavy metals, TSS, paint wastes, thinner, varnish, heavy metals, spent chlorinated solvents.
Cleanup of spills and drips	Used absorbent materials	TSS, spilled materials
Metal Preparation	Grinding, welding, sawing, shaving, brazing, bending cutting, etching	Steel scraps, aluminum scraps, brass, copper, dust, chips and borings, steel scale, Teflon, manganese.
Surface Treatment	Finishing, plating, case hardening, chemical coating, polishing, rinsing, abrasive cleaning	Acid, aromatic solvent, corn cob, lubricants, sand, oil, pH, nitrates, nitrites, carbon, phosphates, borates, nitrogen, oily sludge, nickel, chromium, hydrofluoric fluid.
Equipment/vehicle maintenance	Leaking fluids, fluids replacement	Oil and grease
Storage of uncoated structural steel	Structural steel being placed on porous pavement	aluminum, lead, zinc, copper, iron, oxide, oil, nickel, and manganese
Storage of galvanized steel directly on the ground	Galvanized material dripping/leaking	Zinc, nickel, cadmium and chromium
Storage areas	Unidentifiable drums/chemicals,	Benzene, toluene, xylene, and

	extended exposure to weather conditions, tank corrosion and open containers	other volatile organics and solvents
--	-----------------------------------------------------------------------------	--------------------------------------

**Findings:**

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



NEW MEXICO  
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

BILL RICHARDSON  
Governor  
DIANE DENISH  
Lieutenant Governor

Harold Runnels Building, N2050  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, NM 87502-5469  
Phone (505) 827-0187 Fax (505) 827-0160  
www.nmenv.state.nm.us

RON CURRY  
Secretary  
SARAH COTTRELL  
Deputy Secretary

December 6, 2010

Mr. Edward Luna, Owner  
Rio Rancho Iron Works Inc.  
412-C Frontage Rd.  
Rio Rancho, NM 87124

**Re: Industrial Storm Water, SIC 3446, NPDES Compliance Evaluation Inspection, Rio Rancho Iron Works Inc., NMU001696, December 3, 2010**

Dear Mr. Luna,

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 (Marcia Gail Bohling, USEPA (6EN-WC), 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 the cooperation and assistance provided during my visit to your site. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 222-9587.

Sincerely,

*Sarah Holcomb*

Sarah Holcomb  
Environmental Scientist/Specialist  
Surface Water Quality Bureau

Cc: Marcia Gail Bohling, USEPA (6EN-AS) via e-mail  
Stacey Bennett-Dwyer, USEPA (6EN-AS) via e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail  
Diana McDonald, USEPA (6EN-WM) via e-mail

7008 3230 0000 2810 2987

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)  
For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To *EDWARD LUNA*  
Street, Apt. No.,  
or PO Box No.  
City, State, ZIP+4

PS Form 3800, August 2006 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.  
Print your name and address on the reverse so that we can return the card to you.  
Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Edward Luna  
412-C Frontage Rd.  
Rio Rancho, NM  
87124

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee

B. Received by (Printed Name) C. Date of Delivery  
Ed Luna 12-9-10

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Transfer from service label) 7008 3230 0003 2810 7987



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	6	9	6	11	12	1	0	1	2	0	3	17	18 -	19 S	20 2	
Remarks																							
S E C T O R A A																							
Inspection Work Days						Facility Evaluation Rating						BI	QA	Reserved									
67						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) <b>RIO RANCHO IRON WORKS, RIO RANCHO, SANDOVAL COUNTY - FROM HWY 528 HEADED NORTH. TURN RIGHT ONTO THE FRONTAGE ROAD AT THE SUNDT LIGHT. CONTINUE NORTH ON THE FRONTAGE RD UNTIL 412-C.</b>	Entry Time /Date 1230 hours / 12-3-2010	Permit Effective Date 9-29-2008
	Exit Time/Date 1250 hours / 12-3-2010	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>MR. EDWARD LUNA, OWNER (505) 994-0776</b>	Other Facility Data SIC CODE: 3446	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>MR. EDWARD LUNA, OWNER (505) 994-0776 RIO RANCHO IRON WORKS INC 412 C FRONTAGE RD., RIO RANCHO, NM 87124</b>	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	GPS: N. 35° 15' 48.55" W. 106° 37' 49.69"

#### Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	N	Flow Measurement	M	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)

- FACILITY HAS NOT APPLIED FOR AND RECEIVED REQUIRED NPDES PERMIT COVERAGE AND HAS NOT PREPARED AND IMPLEMENTED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP).
- SEE ATTACHED REPORT AND FURTHER EXPLANATIONS.

Name(s) and Signature(s) of Inspector(s) <b>Sarah Holcomb</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB 505-221-9587</b>	Date <b>12-6-10</b>
Signature of Management QA Reviewer 	Agency/Office/Phone and Fax Numbers <b>NMED/SWQB 505-827-2798</b>	Date <b>12-6-10</b>

**Compliance Evaluation Inspection**  
**Rio Rancho Iron Works Inc., Sector AA**  
**NPDES Permit #NMU001696, December 3, 2010**

**Further Explanations**

**Introductions**

On December 3, 2010, a Compliance Evaluation Inspection was conducted at the Rio Rancho Iron Works Inc. facility (Standard Industrial Classification code: 3446) located in Rio Rancho, New Mexico by Sarah Holcomb of the State of 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 multi-sector general storm water permit (MSGP) for industrial activities (this facility has industrial activities being conducted on-site that meet the description of industrial activities in Sector AA) and stormwater regulations at **40 Code of Federal Regulations (CFR) Part 122.26**.

Rio Rancho Iron Works Inc. has been in business since 1997. This facility is engaged in the manufacturing of various iron materials, including gates and fences.

Storm water from this facility discharges to the Rio Rancho MS4, thence to the Rio Grande in 20.6.4.106 NMAC of the Rio Grande Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*). Designated uses of the Rio Grande in this section are irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and secondary contact.

The inspector arrived at the facility at 1230 hours. The inspector conducted an entrance interview with Mr. Edward Luna, Owner, and Ms. Rochelle Anaya, Office Manager, during which the inspector made introductions, presented her credentials and discussed the purpose of the inspection. Ms. Anaya accompanied the inspector on a tour of the facility and explained processes in place.

This report is based on verbal information reported by the facility representative, on-site observations made by NMED personnel, and records maintained by NMED and the USEPA.

**Findings:**

*Section 301(a) of the Federal Water Pollution Control Act (a.k.a. Clean Water 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.*

*40 Code of Federal Regulations 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."*

This facility did not have NPDES permit coverage on the date of this inspection. Storm water discharges from this facility can be regulated by either an individual NPDES permit or the Storm Water Multi-Sector General Permit for Industrial Activities (MSGP). This type of facility is covered under Section AA – Fabricated Metal Products – under SIC 3446.

A Storm Water Pollution Prevention Plan (SWPPP) had not been prepared in written form, was not available at the site for inspection, and was not being implemented on site. 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 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

- A description of appropriate measures and controls – include 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.

**Activities at this iron manufacturing facility can result in the creation of various pollutant sources that include, but are not limited to, the following:**

- **Metal Preparation:** These activities can be a source of pollutants such as steel scraps, aluminum scraps, brass, copper, dust, chips and borings, steel scale, Teflon, and manganese. These pollutants can come from sources such as grinding, welding, sawing, shaving, brazing, bending, cutting and etching.
- **Parts Cleaning:** These activities can be a source of pollutants such as acid, coolants, clean composition, degreaser, mineral spirits, pickle liquor, spent caustic, and sludge. These pollutants can come from sources such as solvents, hot and cold dips, cleaning parts, and degreasing.
- **Surface Treatment:** These activities can be a source of pollutants such as acid, aromatic solvents, corn cob, lubricants, sand, oil, pH, nitrites, nitrates, carbon phosphates, borates, nitrogen, oily sludge, nickel, chromium, and hydrofluoric acid. These pollutants can come from sources such as finishing, plating, case hardening, chemical coating, coating, polishing, rinsing, abrasive cleaning and electroplating.
- **Galvanizing:** These activities can be a source of pollutants such as acid solution, phosphates, zinc chromate, hexavalent chromium, and nickel. These pollutants can come from sources such as spills, leaks and transporting materials.
- **Painting:** These activities can be a source of pollutants such as paint wastes, thinner, varnish, heavy metals, and spent chlorinated solvents. These pollutants can come from sources such as empty containers, paint application wastes, spills, over spraying and storage areas.
- **Heavy equipment use and storage:** These activities can be a source of pollutants such as oil, heavy metals, organics, fuels, TSS, hydraulic oil, diesel fuel and gasoline. These pollutants can come from sources such as leaking fluids, fluid replacement, washing equipment, use on poor surface area, and soil disturbance.
- **Equipment maintenance:** These activities can be a source of pollutants such as oil and grease. These pollutants can come from sources such as leaking fluids, fluid replacement, and washing equipment.
- **Storage of uncoated structural steel:** These activities can be a source of pollutants such as aluminum, lead, zinc, copper, iron, oxide, oil, nickel and manganese. These pollutants can come from sources such as being stored on porous pavements.
- **Storing galvanized steel directly on the ground:** This activity can be a source of pollutants such as zinc, nickel, cadmium and chromium. This comes from galvanized material dripping or leaking.
- **Vehicle/equipment traffic:** These activities can be a source of pollutants such as Total Suspended Solids (TSS) from erosion, and hydraulic fluid loss/spillage. These pollutants can come from sources such as soil disturbance and erosion.
- **Cleaning equipment/vehicles:** These activities can be a source of pollutants such as oil, grease, surfactants, chromates, acid, hydroxide, and nitric acid. These pollutants can come from sources such as chemicals disposed improperly and spillage.
- **Storage areas:** This activity can be a source of pollutants such as benzene, toluene, xylene, and other volatile organics, and solvents. These pollutants can come from sources such as unidentifiable drums, extended exposure to weather conditions, tank corrosion, and open containers.
- **Equipment usage:** This activity can be a source of pollutants such as oil, grease and lead. These pollutants can come from sources such as malfunctioning equipment, and stockpiled obsolete equipment.

- **Above ground storage tanks:** This activity can be a source of pollutants such as fuel oil and various chemicals. These pollutants can come from sources such as installation problems, spills, external corrosion and structural failure.

**If not properly managed or treated in accordance with an NPDES permit, activities associated with the treatment of wastewater at this facility are a potential threat to water quality through storm water discharges.**

### **Site Inspection Summary**

The MSGP was reissued in 2008.

On the day of the inspection, some pollutant sources observed on site that were exposed outside and could potentially come into contact with storm water included: a grinding operation for preparing the materials for construction.

For additional information on BMPs and SWPPPs for Sector AA, please refer to pages 51048-51055 in the document entitled *Final NPDES Storm Water Multi-Sector General Permit for Industrial Activities (Federal Register/Vol. 60, No. 189, Friday, September 29, 1995)*. This document can be downloaded from "Storm Water Archived Publications" at: [https://cfpub2.epa.gov/npdes/docs.cfm?view=archivedprog&program\\_id=6&sort=date\\_published](https://cfpub2.epa.gov/npdes/docs.cfm?view=archivedprog&program_id=6&sort=date_published). This is an older, discontinued permit (1995 MSGP) but contains helpful background information that was not carried over to either the 2000 or 2008 MSGP.

An exit interview to discuss the preliminary findings of this inspection was conducted on-site with Mr. Luna and Ms. Anaya at approximately 1245 hours. The inspector informed the facility representatives of the requirements under the NPDES storm water program regarding permitting requirements, preparation of a SWPPP, and installation of appropriate storm water runoff control practices (per the SWPPP).

After returning to the office, the inspector sent Mr. Luna an email with information on the permitting process, including links to the permit, an example Storm Water Pollution Prevention Plan, guidance documents, Best Management Practices and how to file for coverage using the eNOI system. The inspector also left a business card with Mr. Luna in case there were questions at a later time.