



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 Request

December 10, 2012

Mr. Charles Quintana, President
Santa Fe Steel
201 Dinosaur Trail
Santa Fe, NM 87507

**RE: Industrial Stormwater Inspection; SIC 3441; NPDES Compliance Evaluation
Inspection; Santa Fe Steel; NPDES Permit NMU001823 ; November 21, 2012**

Dear Mr. Quintana:

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>.

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

Santa Fe Steel
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December 10, 2012

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 II, 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 2 3 11 12 1 2 1 1 2 1 17 18 ~ 19 S 20 2					
Remarks					
F A B R I C A T E D S T R U C T U R A L M E T A L					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 3	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) SANTA FE STEEL 201 Dinosaur Road Santa Fe, NM 87507 SANTA FE COUNTY	Entry Time /Date 0924 Hours / 11-21-2012	Permit Effective Date 9-29-2008
	Exit Time/Date 1100 Hours / 11-21-2012	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Chris Ortega / (505) 474-5997 / (505) 474-5665	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Charles Quintana / President / (505) 5997 / (505) 474-5665 201 Dinosaur Trail Santa Fe, NM 87507	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	GPS: N. 35°36'37.24" W. -106°01'31.20" SECTOR AA SIC 3441

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 12-07-2012
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 12-07-2012

Santa Fe Steel
NPDES Compliance Evaluation Inspection
NPDES Permit No. NMU001823
Inspection Date: November 21, 2012

Introduction:

On November 21, 2012, a Compliance Evaluation Inspection (CEI) was conducted at Santa Fe Steel, 201 Dinosaur Trail, Santa Fe, New Mexico in Santa Fe County by Sandra Gabaldón and 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). Santa Fe Steel is classified as fabricated structural metal (see Standard Industrial Classification [SIC] code 3441) that meets the description in Sector AA of the MSGP.

Upon arrival at 0924 hours on November 21, 2012, the inspectors met with Mr. Charles Quintana, President, and Mr. Chris Ortega. The inspector, Ms. Gabaldón, presented her credentials, and explained the purpose of the inspection. The inspector informed Mr. Quintana and Mr. Ortega of the requirements of the Multi-Sector General Permit (MSGP).

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 and click on "industrial activity." Once you navigate to the MSGP on the website, you will also find various Fact Sheets for industrial activities. Fabricated Structural Metal 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, extended exposure to weather conditions, tank corrosion and open containers	Benzene, toluene, xylene, and 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
Official Photo Log
Photo #1

Photographer: Daniel Valenta	Date: November 21, 2012	Time: 1032 Hours
City/County: Santa Fe/Santa Fe		
Location: Santa Fe Steel		
Subject: Oil containers and debris piled up on stormwater collection inlet (pipe crosses underneath road to unknown discharge point outside of property – unable to locate outlet due to overgrowth of brush)		



New Mexico Environment Department/Surface Water Quality Bureau
Official Photo Log
Photo #2

Photographer: Daniel Valenta	Date: November 21, 2012	Time: 1036 Hours
City/County: Santa Fe/Santa Fe		
Location: Santa Fe Steel		
Subject: Diesel Fuel Tank with no secondary containment		



New Mexico Environment Department/Surface Water Quality Bureau
Official Photo Log
Photo #3

Photographer: Daniel Valenta	Date: November 21, 2012	Time: 1034Hours
City/County: Santa Fe/Santa Fe		
Location: Santa Fe Steel		
Subject: Miscellaneous scrap metal stored outside of workshop.		



New Mexico Environment Department/Surface Water Quality Bureau
Official Photo Log
Photo #4

Photographer: Daniel Valenta	Date: November 21, 2012	Time: 1047 Hours
City/County: Santa Fe/Santa Fe		
Location: Santa Fe Steel		
Subject: Retention pond (18" inlet, 12" overflow, which enters stormwater collection inlet in Photo #1; 12,500 cu.ft. capacity)		



New Mexico Environment Department/Surface Water Quality Bureau
Official Photo Log
Photo #5

Photographer: Daniel Valenta	Date: November 21, 2012	Time: 1046 Hours
City/County: Santa Fe/Santa Fe		
Location: Santa Fe Steel		
Subject: Overview of site		

