



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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Resource Protection Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 11, 2013

Mr. Dave Grim, Plant Manager
Georgia Pacific Corrugated
17 Kitty Hawk Blvd.
Santa Teresa, NM 88008

Re: Industrial Storm Water, SIC 2653, NPDES Compliance Evaluation Inspection, Georgia Pacific Corrugated, NMU001843, January 29, 2013

Dear Mr. Grim,

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 the cooperation and assistance that Ms. Susy Vega and Mr. Paul Ives 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,
/s/ Sarah Holcomb
Sarah Holcomb
Environmental Scientist/Specialist
Surface Water Quality Bureau

Cc: Hannah Branning, USEPA (6EN-AS) via email Darlene Whitten-Hill, USEPA, via email
Rashida Bowlin, USEPA (6EN-AS) via email NMED District III Manager, via email
Carol Peters-Wagnon, USEPA (6EN-WM) via email Sam Barket, Regional EHS Manager, GP, via email
Diana McDonald, USEPA (6EN-WM) via 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	
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Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved		
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Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) General Pacific Corrugated, Santa Teresa, Doña Ana County, NM: From I-10, travel into Texas, then take Exit 8 to TX-178W. Travel about 4 miles (back into NM) to McNutt Rd., turn left. Travel one mile, turn right on Airport Rd. Turn left on Kitty Hawk Blvd.	Entry Time /Date 0943 hours / 1-29-2013	Permit Effective Date 9-29-2008
	Exit Time/Date 1110 hours / 1-29-2013	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Ms. Susy Vega, EHS Manager, 575-874-1000 Mr. Paul Ives, Reliability Manager	Other Facility Data SIC: 2653	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Dave Grim, Plant Manager (575) 874-4012 17 Kitty Hawk Blvd., Santa Teresa, NM 88008	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	GPS: N. 31° 51' 41.93" W. -106° 41' 36.99"

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
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

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

- The inspector arrived at the facility at 0943 hours on January 29, 2013 and conducted an entrance interview with Ms. Susy Vega, EHS Manager, and Mr. Paul Ives, Reliability Manager, where she presented credentials, made introductions and explained the purpose of the inspection. An exit interview was conducted the same day with Ms. Vega, Mr. Ives and over the phone with Mr. Sam Barket, Regional EHS Manager for General Pacific, where she explained the preliminary findings of the inspection.
- Please see report for further details.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 2-11-2013
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 2-11-2013

Compliance Evaluation Inspection
General Pacific Corrugated, Sector B
NPDES Permit #NMU001843, January 29, 2013

Further Explanations

Introduction

On January 29, 2013, a Compliance Evaluation Inspection was conducted at the Georgia Pacific Corrugated facility (Standard Industrial Classification Code 2653) located in Santa Teresa, NM 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 B) and stormwater regulations at **40 Code of Federal Regulations (CFR) Part 122.26**.

Georgia Pacific has operated in this location since 2007, when they bought out the previous business, Vista Corrugated. During the entrance interview, the permittee representatives, Ms. Susy Vega and Mr. Paul Ives indicated that they did not currently have coverage under the MSGP due to the perception that they were exempt due to the location of stormwater detention basins on site. A review of the EPA NOI database located at <http://cfpub.epa.gov/npdes/stormwater/noi/noisearch.cfm> indicated that Vista Corrugated did have coverage under the 2000 permit, but permittee representatives indicated that they did not know of a stormwater pollution prevention plan in place under the old permit. The tracking number assigned to Vista Corrugated under the 2000 permit was NMR05B200.

Storm water from this facility discharges into an unnamed arroyo, thence to the Rio Grande in segment 20.6.4.101 NMAC (*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 primary contact.

The inspector arrived at the facility at 0943 hours. The inspector conducted an entrance interview with Ms. Susy Vega, EHS Manager, and Mr. Paul Ives, Reliability Manager, during which the inspector made introductions, presented her credentials and discussed the purpose of the inspection. Ms. Vega and Mr. Ives accompanied the inspector on a tour of the facility and explained processes and management measures already 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. the 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 Sector B – Paper and Allied Products – under SIC 2653 (Corrugated and Solid Fiber Boxes).

A Storm Water Pollution Prevention Plan (SWPPP) had not been prepared 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 this facility, and identification of specific potential pollutants; and
- **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, preventative 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 corrugated cardboard manufacturing facility can result in the creation of various pollutant sources that include, but are not limited to, the following:

- **Outdoor loading and unloading**
- **Raw and/or waste material storage areas**
- **Log, lumber and other wood product storage areas**

These activities could be a source of pollutants such as Biochemical Oxygen Demand, Chemical Oxygen Demand, Nitrate + Nitrite Nitrogen, Total Kjeldahl Nitrogen, Oil & Grease, pH, Total Phosphorus, and Total Suspended Solids.

If not properly managed or treated in accordance with an NPDES permit, activities associated with this facility could be a potential threat to water quality through storm water discharges.

Site Inspection Summary

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: 1) outdoor storage of raw materials (please see Photo #6), and 2) loading areas (although these generally appeared to be under cover). The materials stored outside were numerous rolls of raw paper used in the manufacturing process.

An exit interview to discuss the preliminary findings of this inspection was conducted onsite with Ms. Vega and Mr. Ives at approximately 1100-1110 hours. The inspector also spoke with Mr. Sam Barket, Regional EHS Manager for General Pacific, over the phone regarding permitting requirements. Mr. Barket informed the inspector that GP did not obtain permit coverage for this particular facility because of the presence of five detention ponds at the site. However, the inspector inquired as to the availability of engineering calculations to show the size of storm that the ponds were designed to hold, and Mr. Barket indicated on 2-7-2013 that he was unable to find any engineering calculations for those ponds. 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). The inspector also discussed the availability of the No Exposure Certification, if all of the outdoor storage was under cover.

On February 8, 2013, the inspector was provided with engineering calculations showing that the on-site ponds were designed to retain a 100 year storm. According to these documents, the 100 year storm for the Santa Teresa area is calculated as 3.8 inches. Going back through rainfall records in Santa Teresa, June and September 2009 appear to be close, but there were no 100 year events during this particular time frame. Copies of these documents are included with this report as Appendix A.

After returning to the office, the inspector sent the company 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 left a business card with Ms. Vega in case there were questions at a later time.

NMED/SWQB

Official Photograph Log
Photo # 1-5

Photographer: Sarah Holcomb	Date: 1-29-2013	Time: 1029-1039 hours
City/County: Santa Teresa, Doña Ana County		
Location: General Pacific Corrugated, Kitty Hawk Blvd. (near Airport Rd.)		
Subject: The five retention ponds located on the facility's grounds.		



NMED/SWQB

Official Photograph Log

Photo # 6

Photographer: Sarah Holcomb	Date: 1-29-2013	Time: 1033 hours
City/County: Santa Teresa, Doña Ana County		
Location: General Pacific Corrugated, Kitty Hawk Blvd. (near Airport Rd.)		
Subject: Raw paper outdoor storage area and loading dock.		



NMED/SWQB

Official Photograph Log

Photo # 7

Photographer: Sarah Holcomb	Date: 1-29-2013	Time: 1036 hours
City/County: Santa Teresa, Doña Ana County		
Location: General Pacific Corrugated, Kitty Hawk Blvd. (near Airport Rd.)		
Subject: The facility's boneyard – materials kept for equipment maintenance purposes.		



Appendix A



*Vista Corrugated
17 Kitty Hawk Blvd
Santa Teresa, NM 88008*

January 31, 2013

7012 1010 0001 3992 8105
VIA CERTIFIED MAIL/RETURN RECEIPT

Ms. Sarah Holcomb
New Mexico Environment Dept.
Industrial Point Source Reg. Section
5500 San Antonio NE
Room 158
Albuquerque, NM 87109

**RE: Georgia-Pacific Corrugated III LLC
Storm Water Permit Coverage**

Dear Ms. Holcomb:

Please find enclosed a site drawing for the Georgia-Pacific Corrugated III LLC (GP) facility located in Santa Teresa, NM. Please note that the drawing shows the design of the on-site storm water retention ponds, and indicates the engineering calculations completed to demonstrate that the ponds should capture and retain runoff from a 100-year event.

This information demonstrates that GP does not discharge storm water associated with industrial activity, and therefore is exempt from coverage under the US EPA multi-sector general storm water permit. If you need any additional assistance, please call Susy Vega at (575) 874-1000, or Sam Barket at 714-228-3453.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dave Grim', written over a horizontal line.

Dave Grim
Plant Manager

Enclosure

PASO DEL NORTE LIMITED PARTNERSHIP
(BOOK 373, PAGES 870-892)

FIRST NATIONAL BANK PROPERTY
(BOOK 346, PAGES 228-230)

SOUTHERN PACIFIC R.R. 100' R.O.W.

KITTYHAWK BLVD.

SET 5/8" REBAR WITH
YELLOW CAP NO. 5948

CUT "VEE" TYPE DITCH
TO DRAIN TO BOTTOM OF
POND #1.

ASPHALT ENDS FOR PHASE I

FINISH

SEC
2 C-3

SEC
3 C-3

SEC
4 C-3

PONDING
AREA #2

PONDING
AREA #3

PONDING
AREA #4

TOC 05.0

TOC 05.0

FS 03.75

FS 04.0

FS 07.75

FS 07.25

FS 08.0

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SOUTHERN PACIFIC RAILROAD
RIGHT-OF-WAY

UNDERGROUND MSJ CABLE
(TYPICAL)

POWER POLE (TYP.)
W/ OVERHEAD LINE

FOUND 5/8" REBAR WITH
YELLOW CAP NO. 5948

SOUTHERN PACIFIC RAILROAD
RIGHT-OF-WAY

FOUND 5/8" REBAR WITH
YELLOW CAP NO. 5948

POWER POLE (TYP.)
W/ OVERHEAD LINE

SOUTHERN PACIFIC RAILROAD
RIGHT-OF-WAY

SOUTHERN PACIFIC R.R. 200' R.O.W.

FS 07.3
RAMP
TOC 07.5
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07.2
07.5
07.5
FS

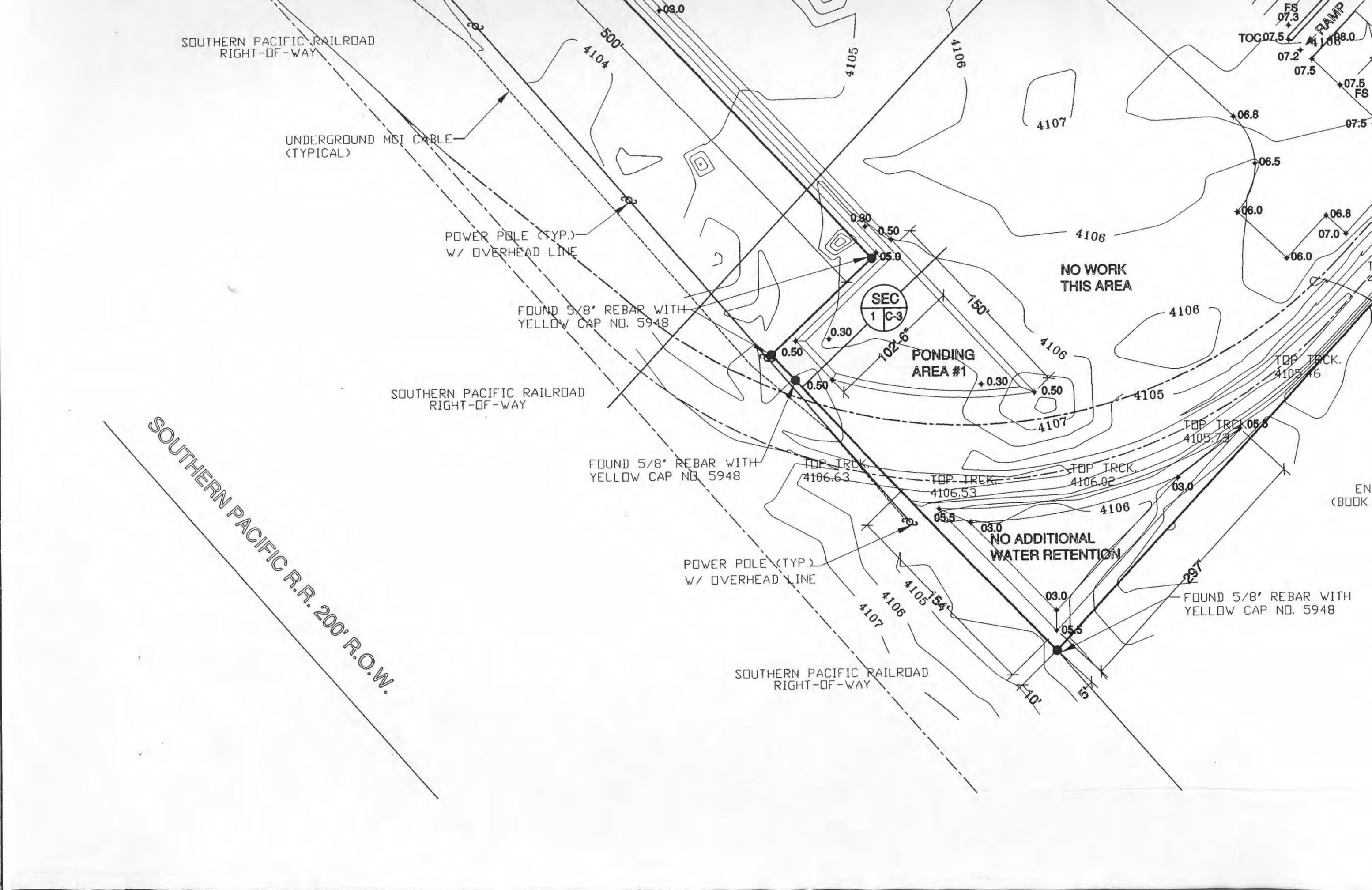
NO WORK
THIS AREA

PONDING
AREA #1

NO ADDITIONAL
WATER RETENTION

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EN
(BOOK

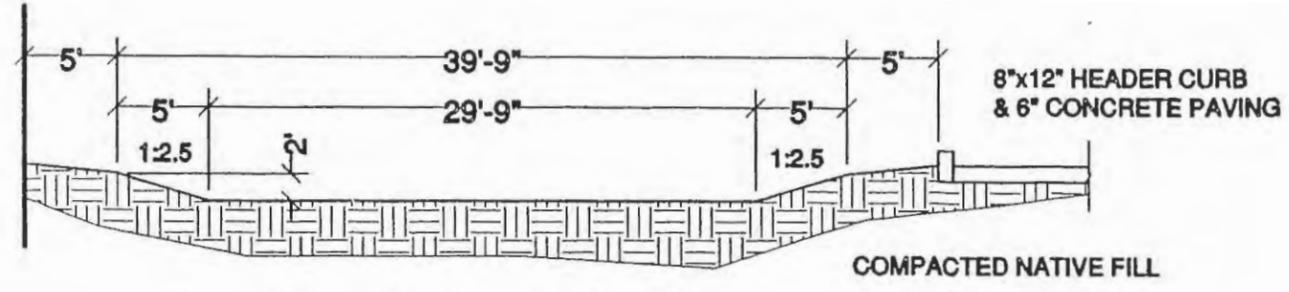


08.0 FS
 SEC C-C-5
 SEC A-A-C-5
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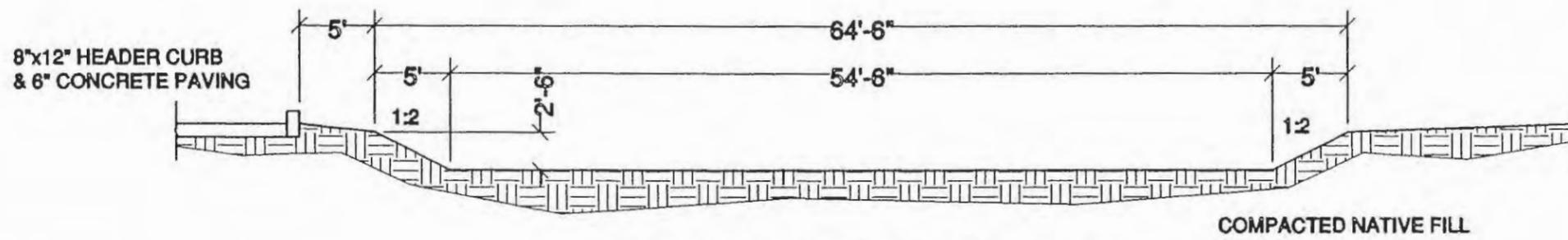
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FOUND 5/8" REBAR WITH YELLOW CAP NO. 5948

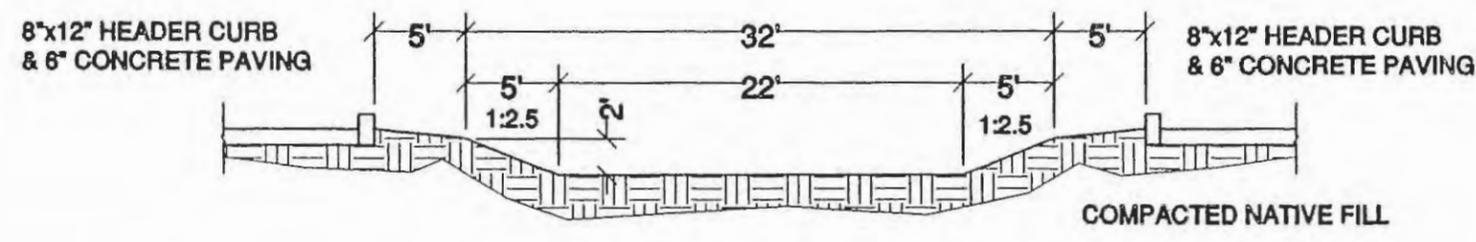
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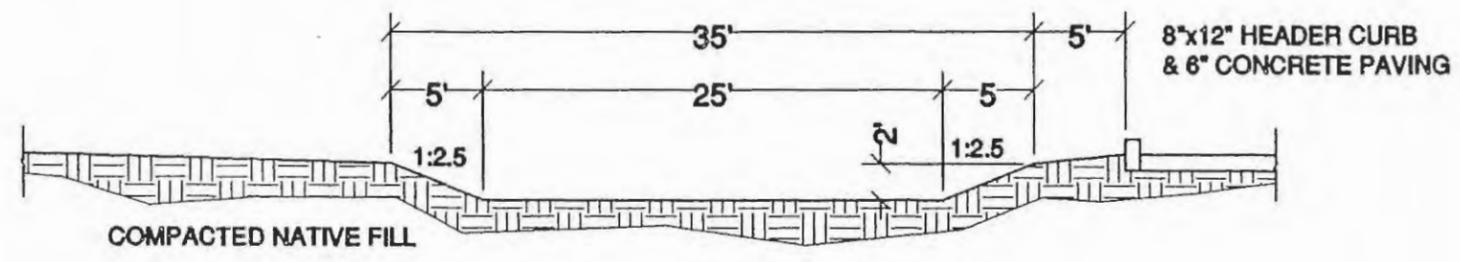
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 SCALE 1" = 10'-0"



POND #3 SECTION 3 / C-3
 SCALE 1" = 10'-0"

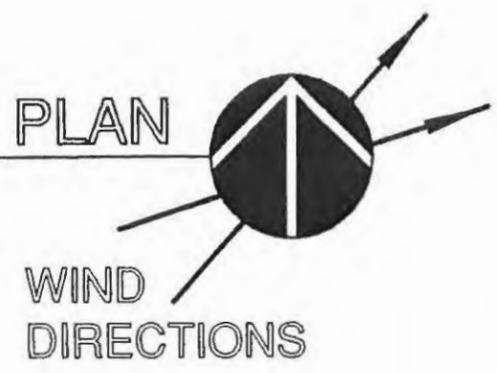


POND #4 SECTION 4 / C-3
 SCALE 1" = 10'-0"



POND #5 SECTION 5 / C-3
 SCALE 1" = 10'-0"

GRADING PLAN
 SCALE 1" = 60'-0"



Revi	Date: 04/26/96	Rev'd: 05/13/96
Sheet No.	C-3	
LUNDEEN & associates inc. Architects <small>Solar, Geothermal, Commercial, Industrial, Residential Architecture</small> <small>618 South Alameda Blvd, Las Cruces, N.M. 88005 (505) 526-3326</small>		
<small>9617C-3E.DWG P.DWG 1" = 60'</small>		