



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
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

DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

TOM SKIBITSKI
Acting Director
Resource Protection Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 12, 2013

Mr. John Wright, Owner
Southwest Fireproofing and Acoustical Co., Inc.
5119 Edith Blvd. NE
Albuquerque, NM 87107

Re: Industrial Storm Water, SIC 3275 or 3295, NPDES Compliance Evaluation Inspection, Southwest Fireproofing and Acoustical Co., Inc., NMU001846, February 5, 2013

Dear Mr. Wright,

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 your wife, Nira, 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 Bill Chavez, NMED District I, via email
Carol Peters-Wagnon, USEPA (6EN-WM) via email
Diana McDonald, USEPA (6EN-WM) via email

Compliance Evaluation Inspection
Southwest Fireproofing, Sector E
NPDES Permit #NMU001846, February 5, 2013

Further Explanations

Introduction

On February 5, 2013, a Compliance Evaluation Inspection was conducted at the Southwest Fireproofing and Acoustical Co., Inc. facility (Standard Industrial Classification Code 3275 or 3295) located in Albuquerque, NM by Sarah Holcomb of the State of New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB), accompanied by Daniel Valenta, also of NMED 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 E) and stormwater regulations at **40 Code of Federal Regulations (CFR) Part 122.26**.

The inspectors arrived at the facility at 0945 hours. An entrance interview was conducted with Mrs. Nira Wright, Owner, during which the inspectors made introductions, presented their credentials and discussed the purpose of the inspection. Mrs. Wright accompanied the inspectors on a tour of the facility and explained processes and management measures already in place.

Southwest Fireproofing manufactures cementitious fireproofing products using vermiculite and gypsum to form various types of products. The final materials are pelletized and shrink wrapped, and sent out to customers. The raw materials are brought in to the facility via rail and are offloaded immediately into the building and stored inside.

Southwest Fireproofing has operated in this location since September of 1976, when they bought out the previous business, LyleCo. During the entrance interview, Mrs. Wright indicated that she had no knowledge of the NPDES stormwater program and did not currently have coverage under the MSGP. The inspectors provided Mrs. Wright with an EPA fact sheet explaining why coverage was required for this type of facility.

Storm water from this facility discharges to the Albuquerque MS4, thence to the Rio Grande in segment 20.6.4.105 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, public water supply, wildlife habitat and primary contact.

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 E – Glass, Clay, Cement, Concrete and Gypsum Products – under either SIC 3275 (Gypsum Products, Treated) or SIC 3295 (Minerals or Earths, Ground or Otherwise).

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 fireproofing manufacturing facility can result in the creation of various pollutant sources that include, but are not limited to, the following:

- **Material storage:** This activity can be a source of pollutants such as Total Suspended Solids (TSS), pH, Chemical Oxygen Demand (COD), potassium and sulfate. These pollutants can come from sources such as exposed kiln dust, limestone, shale, coal, clinker, gypsum, clay, slag and sand.
- **Material handling at concrete product manufacturing facilities:** This activity can be a source of pollutants such as TSS, COD, pH, lead, iron and zinc. These pollutants can come from sources such as exposed aggregate, concrete, shale, clay, slate, slag, pumice, and limestone, as well as spills or leaks of cement, fly ash, admixtures and baghouse settled dust.
- **Material storage and material handling (including bagging and packaging) at gypsum manufacturing facilities:** This activity can be a source of pollutants such as TSS, COD and pH. These pollutants can come from sources such as exposed gypsum rock, synthetic gypsum, recycled gypsum and wallboard, stucco, perlite ore/expanded perlite and coal.
- **Equipment and vehicle maintenance:** This activity can be a source of pollutants such as oil and grease, BOD, COD, pH, lead, iron, zinc, aluminum, arsenic, cadmium, chromium, and benzene. These pollutants can come from sources such as gasoline, diesel, fuel and fuel oil, parts cleaning, waste disposal of solvents, oily rags, oil and gas filters, batteries, coolants, and degreasers, and fluid replacement including lubricating oils, hydraulic fluid, oil, transmission fluid, radiator fluids, solvents and grease.

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 #2), and 2) loading areas (although these generally appeared to be under cover). The materials stored outside refuse from the process (in an uncovered dumpster) and various metal parts which are pieced out for equipment repairs as needed. Otherwise, it appeared all industrial processes were located inside the facility's building. Raw materials are delivered via rail spur but are offloaded immediately into the building.

An exit interview to discuss the preliminary findings of this inspection was conducted onsite with Mrs. Wright at approximately 1010-1015 hours. The inspectors informed the Mrs. Wright 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 material was stored under cover.

After returning to the office, the inspector sent Mrs. Wright 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 inspectors left business cards with Mrs. Wright in case there were questions at a later time.

NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Sarah Holcomb	Date: 2-5-2013	Time: 1003 hours
City/County: Albuquerque, Bernalillo County		
Location: Southwest Fireproofing, Edith Blvd.		
Subject: Outdoor trash receptacle.		



NMED/SWQB

Official Photograph Log

Photo # 2

Photographer: Daniel Valenta	Date: 1-29-2013	Time: 1006 hours
City/County: Albuquerque, Bernalillo County		
Location: Southwest Fireproofing, Edith Blvd.		
Subject: Outdoor storage of metal and old equipment stored for parts.		

