

Cherne, Curtis

From: Cherne, Curtis
Sent: Friday, October 05, 2012 8:43 AM
To: 'Zachary Lacombe'
Subject: FW: Site Audit Albuquerque, NM (ABQ-120) 9-12-12

Zachary,
 Please see below from the City's EPA/SWPPP group. I concur with their recommendation.

Curtis

From: Penttila, Roland V.
Sent: Thursday, October 04, 2012 3:04 PM
To: Cherne, Curtis
Cc: Verhage, Kathleen M.
Subject: FW: Site Audit Albuquerque, NM (ABQ-120) 9-12-12

I get the impression that the old Rowland's Nursery site is NOT a city project. Therefore, we did not have an interest in the SWPPP, inspection or enforcement. (That will come once the new Storm Drainage Ordinance is approved by the Council).

If any site is thought to be violating its SWPPP, even after the work is completed, NMED is the EPA's local enforcement arm. I would suggest that ABF contact Sarah Holcomb to have her visit and inspect the site. She'll get their attention. Her number is 1-505-222-9587.

forwarded by:

Roland Penttila, P.E.

Manager, Stormwater Management Section
 Engineering Division; City of Albuquerque
 505-768-2778

From: Verhage, Kathleen M.
Sent: Thursday, October 04, 2012 2:32 PM
To: Cherne, Curtis ; 'info@smokc.com'
Cc: 'zlacombe@abf.com'; Penttila, Roland V.
Subject: RE: Site Audit Albuquerque, NM (ABQ-120) 9-12-12

Hi Curtis-

The construction SWPPP for activities adjacent to the facility should have addressed the issue of sediment control. Post-construction stabilization is one of the issues that we struggle to deal with in our arid climate. Unfortunately, there are no ordinances or regulations in place that allow the COA to enforce construction SWPPPs. It's up to the owner and operator of the construction SWPPP to choose effective BMPs and implement them during the permit duration. I can send a letter to the site owner that the BMPs chosen appear to be ineffective and that the silt fence needs to be repaired or removed but I have no mechanism to enforce compliance. I can also alert the NMED to the situation. Although the state doesn't have

10/5/2012

primacy, EPA Region 6 has authorized NMED surface water personnel to serve as inspectors for enforcement actions. Silt fence is also required per fugitive dust permitting. The Air Quality Division has enforcement capability. Would they be able to require new silt fencing if blowing dirt is an issue?

Kathy

From: Cherne, Curtis
Sent: Tuesday, October 02, 2012 4:22 PM
To: Verhage, Kathleen M.; 'info@smokc.com'
Cc: 'zlacombe@abf.com'
Subject: FW: Site Audit Albuquerque, NM (ABQ-120) 9-12-12

Kathy/Terence Haynes,
I have reviewed the photographs and the attached audit. It appears that ABF's concern could be mitigated with an improved and effective SWPPP. What do you recommend?

Curtis

From: Zachary Lacombe [<mailto:zlacombe@abf.com>]
Sent: Tuesday, September 25, 2012 4:24 PM
To: Cherne, Curtis
Cc: Shaun McCaffrey
Subject: FW: Site Audit Albuquerque, NM (ABQ-120) 9-12-12

Curtis,

Per our conversation, here is the Facility Audit we recently had that addressed a few issues regarding our compliance with EPA. One of which was the adjoining properties to the SE of our terminal (the old Roland's Nursery site). The property is still not leveled correctly and it's allowing debris to overflow into our culverts. Here are a few pictures I have taken along with some from the audit. Please let me know your thoughts

Zak LaCombe
Branch Manager
ABF Freight System, Inc.
Albuquerque, NM 87109
505-883-1010

From: Shaun McCaffrey
Sent: Wednesday, September 19, 2012 2:31 PM
To: Zachary Lacombe
Cc: Todd Foster
Subject: FW: Site Audit Albuquerque, NM (ABQ-120) 9-12-12

Zach

Please address Item 1 under the Facility Audit Results and Recommendations. Overall, good audit.

Thanks
Shaun479-785-6142

10/5/2012

From: Kevin Laws [<mailto:klaws@meritprofessional.com>]
Sent: Friday, September 14, 2012 3:37 PM
To: Shaun McCaffrey; Zachary Lacombe
Subject: Site Audit Albuquerque, NM (ABQ-120) 9-12-12

Please see the attached audit response.

Kevin Laws
Industrial Account Manager
Merit Professional Services
(214) 862-5633
klaws@meritprofessional.com

10/5/2012

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To: Verhage, Kathleen M.; 'info@smokc.com'
Cc: 'zlacombe@abf.com'
Subject: FW: Site Audit Albuquerque, NM (ABQ-120) 9-12-12
Attachments: Albuquerque 9-12-12 ABF Facility Audit Response.doc; 1D2373B3-2D96-435F-93BF-B4E6C502DE28.jpeg; 3842F6D1-E152-429D-AE3B-0FC4A988F1DD.JPEG; 901C9B9E-F941-4CBB-9655-2B185BFC794F.JPEG; BCF6C498-50C3-4AFA-9DA3-30584DE3D721.jpeg; C1D42B90-3032-4961-B46C-EA06427FE91E.JPEG; 7E92637B-8432-4881-92D0-9BF716260645.jpeg

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 Shaun479-785-6142

10/2/2012

From: Kevin Laws [mailto:klaws@meritprofessional.com]
Sent: Friday, September 14, 2012 3:37 PM
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Subject: Site Audit Albuquerque, NM (ABQ-120) 9-12-12

Please see the attached audit response.

Kevin Laws
Industrial Account Manager
Merit Professional Services
(214) 862-5633
klaws@meritprofessional.com

10/2/2012



Merit Professional Services Facility Audit
4800 Lincoln Road NE
Albuquerque, NM 87109

Dear Shaun McCaffrey,

The terminal facility located at 4800 Lincoln Road NE, Albuquerque, NM 87109 was audited by Kevin Laws with Merit Professional Services on September 12, 2012 to assist with compliance of storm water regulations. Below you will find my findings and recommendations for this facility. Please feel free to contact me with any questions at (214) 862-5633.

Facility Audit Results and Recommendations:

- 1) Oil drums located just outside of bay door on east side of the maintenance building being stored on the ground. (See Picture 1)
 - a. All drums should be elevated to minimize exposure to runoff during a rain event.
- 2) Due to construction just west of the Terminal Facility, sediment is being transported on-site. No sediment was on site at the Terminal Facility at the time of audit, but the issue will be recurring unless addressed. See Pictures (2, 3, & 4)
 - a. Construction appears to have finished, but the site was not completely stabilized.
 - b. Existing silt fence is no longer functioning to prevent sediment from flowing on to the terminal facility property.
 - c. Zach Lacombe stated that sediment has been cleaned from the Terminal Facility several times after flowing from the adjacent property.
 - d. The NPDES Storm Water General Permit states that before filing the Notice of Termination of coverage final stabilization must be reached and all BMPs (Silt fence) must be removed.

SWPPP changes / revisions (Items were either addressed on-site or will be corrected and mailed / emailed by Merit)

- 1) Page 2 in SWPPP tab contained outdated information
 - a. Page 2 will be replaced to reflect Shaun McCaffrey as SWPPP contact.
- 2) Map pages needed updating.
 - a. Trailer Storage, Truck Storage, POD storage, Propane Storage, corrected flow arrows, empty recovery drums used for potential HAZMAT response, drainage swale, dolly storage, corrected flow arrows, corrected outfall locations, corrected site dimensions, and corrected inlet locations will be added to corrected maps and sent to the terminal facility.



Picture 1



Picture 2



Picture 3



Picture 4