

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/11/2022	
Media Program:	Water	
Regulatory Program(s)	NPDES	
Company Name:	Amazon	
Facility Name:	Amazon-Project Charli	
Facility Physical Location:	0.43-miles West of Jubilee Blvd on New Mexico State Road 6 (SR-6)	
(city, state, zip code)	Los Lunas, New Mexico	
Mailing address:	3900 East Camelback Road, Suite 100	
(city, state, zip code)	Phoenix, AZ 85018	
County/Parish:	Maricopa	
Facility Phone Number	602-322-6166	812-309-8798 (mobile telephone)
Facility Contact:	Brock Reckelhoff	Project Manager
	brock.reckelhoff@ryancompanies.com	
FRS Number:	110071083406	
Identification/Permit Number:	NMR1004GS	
Media Identifier Number:	N/A	
NAICS:	236220	
SIC:	1541	
Personnel participating in inspection:		
Tomas Garcia	Ryan Companies US, Inc.	Senior Project Engineer
Dana Museus	Ryan Companies US, Inc.	Superintendent
Bryan Myers	Ryan Companies US, Inc.	Senior Superintendent
Jeremiah Tyson	Safety Counselling, Inc.	Safety Consultant
Levi Dean	New Mexico Environment Department	Industrial and Stormwater Team Supervisor
David Esparza, PE	USEPA-ECDWM	Environmental Engineer
EPA Lead Inspector Signature/Date		
	David Esparza	Date
Supervisor Signature/Date		
	Roberto Bernier	Date

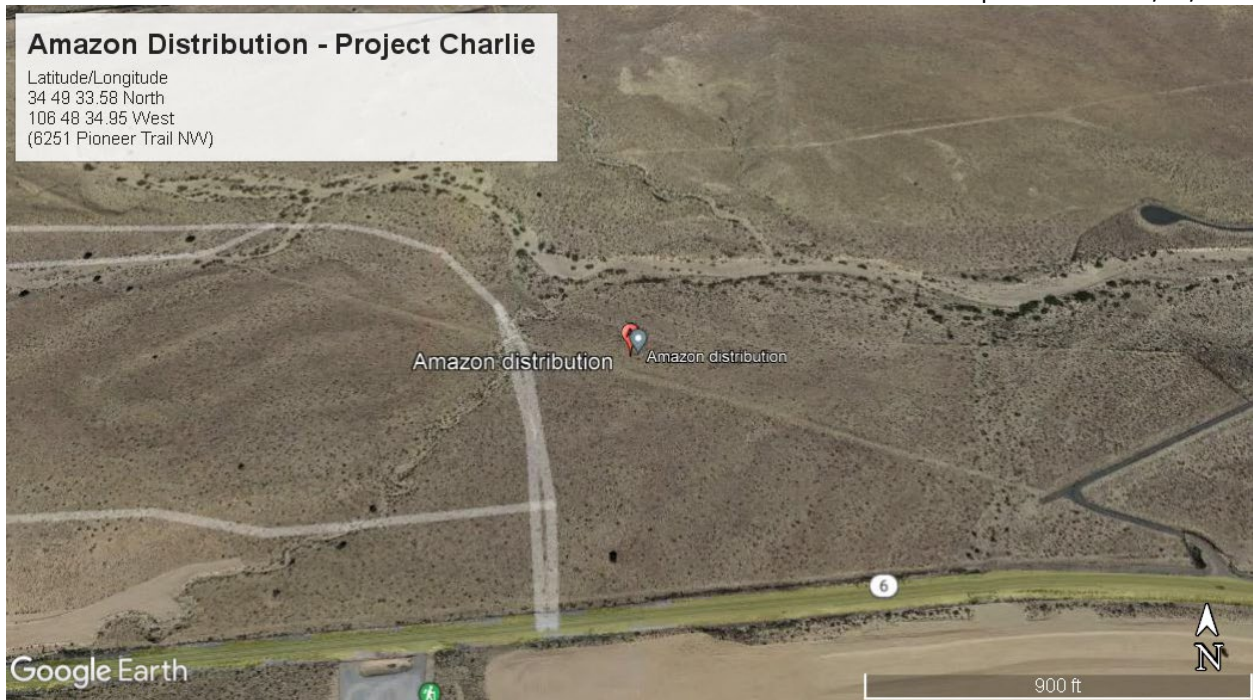
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspector David Esparza, PE, and Levi Dean, New Mexico Environment Department (NMED) – Industrial and Stormwater Team Supervisor, arrived at Amazon-Project Charli (Project Charli) at approximately 1200 PM on March 11, 2022, for an unannounced inspection. I presented my credentials to Mr. Garcia, Senior Project Engineer, Mr. Museus, Superintendent, and Mr. Myers, Senior Superintendent all of Ryan Companies US, Inc., and Mr. Tyson of Safety Counselling. I informed them that this was an EPA inspection to determine the facility's compliance under the Clean Water Act (CWA) and the requirements of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the CWA. The generation of this report is based on information supplied by Project Charli representatives, observations made by the EPA and NMED inspectors, and records and reports maintained by the permittee (Project Charli) and the EPA. Before leaving the facility on March 11, 2022, an exit briefing was held with Mr. Garcia and the other identified individuals above, to explain areas of concern noted at the time of the inspection.

FACILITY DESCRIPTION

Amazon.com, Inc, (Amazon) has started construction on a fulfillment center of more than 1 million square feet. The warehouse facility, where items will be stored, packed, and shipped, is scheduled to open in 2023. The Amazon site - or Project Charli - sits on part of the 2,000-acre Huning Ranch Business & Tech Park, in an expanding industrial corridor. The project site is located at 6251 Pioneer Trail NW or Northwest of Jubilee Blvd on New Mexico State Road 6 (SR-6) in Los Lunas, Valencia County, New Mexico (denoted in **Aerial Image 1** and **Albuquerque Journal Photograph** below). Coordinates to the project location are in the vicinity of: Latitude 34°49'33.58" North, Longitude 106°48'34.95" West. This location can be further described as approximately 25-miles south of Albuquerque, New Mexico.



Aerial Image #1- Overall view of the Amazon-Project Charli Development. Aerial from Google Earth (2021).



The Amazon fulfillment center under construction in Los Lunas from Roberto E. Rosales/Journal, February 23, 2022.

Section II – OBSERVATIONS

The following points of discussion are derived from review of information provided by Project Charli representatives, their consultant, or on-site visual observation. **Note:** the entire Stormwater Pollution Prevention Plan (SWPPP) was reviewed, inclusive of updated versions, inspection reports, product “cut sheets” and site plans/maps.

- The property/landowner is ET Los Lunas; LLC and the occupant is Amazon Services LLC (a subsidiary of Amazon.com, Inc).
- There are two (2) Stormwater Pollution Prevention Plans (SWPPPs), one (1) identified as Bh DevCo- Project Charli and the second as Bh DevCo- Project Charli Offsite. Both prepared on January 20, 2022 and indicating the estimated area to be disturbed as 16.75-acres.
- The original Notice of Intent (NOI) (NMR1004GS) was filed on January 24, 2022 and became effective on February 6, 2022. Note: This NOI cites the Beginning of Project date (BOP) as February 7, 2022, and the End of Project date (EOP) as September 30, 2022. **Appendix 2**
- An additional Notice of Intent (NOI) (NMR1004GU) was filed on January 24, 2022 and became effective on February 6, 2022. Note: This NOI cites the Beginning of Project date (BOP) as February 7, 2022, and the End of Project date (EOP) as September 30, 2022. **Appendix 2**
- A review of the Project Charli-Site Logistics Plan dated June 4, 2021 delineates the project footprint or area of potential effect (APE) within the “orange temporary fencing” (**Appendix 3**). Within this defined area approximately 12,500-gallons of fuel are also indicated as stored. Additionally, the Project’s concrete washout is identified approximately to the left and immediately adjacent to the K Company 500-gallon fuel storage tank. Note: the washout exhibited evidence of recent clean-out efforts, however those efforts compromised the integrity of the liner (Appendix 1 Photograph #1 and Photograph #2).
- Several on-site Inspection Reports (**Appendix 4**) pre-date the effective dates of both NOIs.

Section III – AREAS OF CONCERN

The entire evaluation can be summarized as follows:

- The NOI indicates a BOP of February 7, 2022, but the Project Charli-Site Logistics Plan indicates a date of June 4, 2021.
- The two (2) NOIs list the “Estimated area to be disturbed: as 16.75-acres, is this quantity 16.75-acres each (33.50-acres) or a total of 16.75-acres.
- There is No Spill Prevention, Control and Countermeasure (SPCC) plan for this project. The Project Charli-Site Logistics Plan identifies approximately 12,500-gallons of fuel storage. In accordance with §311 of the Clean Water Act (CWA) (<https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations>) and the SPCC Rule (40 CFR 112), a SPCC plan is required.
- The Project’s concrete washout exhibited evidence of recent clean-out efforts; however, those efforts compromised the integrity of the liner.
- Several on-site Inspection Reports pre-date the effective dates of both NOIs, indicating earthwork activity began prior to approval.

EPA Region 6 inspector David Esparza conducted a closing conference Mr. Garcia and the other individuals identified above at Amazon- Project Charli on March 11, 2022, for the inspection.

Section IV – FOLLOW UP

The following information was received by EPA on March 16, 2022, after exiting the Facility on March 11, 2022:

- Identification of property owner, building (structure) owner, and occupant
- A current copy of the updated SWPPP, inclusive of all on-site inspection reports
- A current copy of the project Site Map delineating the building foot-print area, adjacent “cut material” wasting area, locations/volumes of the on-site fuel storage tanks, and concrete washouts

Section V – LIST OF APPENDICES

Appendix 1 – Amazon-Project Charli Photographic Log
Appendix 2 – NMR1004GS Notice of Intent and NMR1004GU Notice of Intent
Appendix 3 – Project Charli-Site Logistics Plan
Appendix 4 – E2RC On-site Inspection Reports