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Governor

JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

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RYAN FLYNN  
Cabinet Secretary-Designate

BUTCH TONGATE  
Deputy Secretary

ERIKA SCHWENDER  
Director  
Resource Protection Division

**Certified Mail - Return Receipt Requested**

March 25, 2014

Mr. J. Lawton Davis  
Galles and Davis Motor Company, Inc.  
6401 San Mateo Blvd. NE  
Albuquerque, NM 87109

**Re: Galles and Davis Motor Company Illicit Discharge; Major; MS4; SIC 5201; NPDES Compliance Evaluation Inspection; NMS000101; March 12, 2014**

Dear Mr. Davis:

Enclosed please find a copy of the report and check list 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.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Everett Spencer  
US Environmental Protection Agency, Region VI  
Enforcement Branch (6EN-WM)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Bruce Yurdin  
New Mexico Environment Department  
Surface Water Quality Bureau  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sarah Holcomb at 505-827-2798 or at [sarah.holcomb@state.nm.us](mailto:sarah.holcomb@state.nm.us).

Galles and Davis Motor Company

March 25, 2014

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Sincerely,

*Bruce J. Yurdin*

Bruce J. Yurdin  
Program Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

cc: Gladys Gooden-Jackson, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Everett Spencer, USEPA (6EN-WM) by e-mail  
Brent Larsen, USEPA (6WQ-PP) by e-mail  
Raquel Douglas, USEPA (6EN-WC) by e-mail  
NMED District 1, William Chavez by e-mail  
Timothy Parker, NMDOT District 3 Manager, by e-mail  
Ted Barber, Drainage Bureau Manager, NMDOT, by e-mail



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 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="S"/> 4 <input type="text" value="0"/> 5 <input type="text" value="0"/> 6 <input type="text" value="0"/> 7 <input type="text" value="1"/> 8 <input type="text" value="0"/> 9 <input type="text" value="1"/> 10 <input type="text" value="1"/> 11 <input type="text" value="1"/> 12 <input type="text" value="4"/> 13 <input type="text" value="0"/> 14 <input type="text" value="3"/> 15 <input type="text" value="1"/> 16 <input type="text" value="1"/> 17 <input type="text" value="1"/> 18 <input type="text" value="-"/> 19 <input type="text" value="S"/> 20 <input type="text" value="2"/>																					
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Inspection Work Days					Facility Evaluation Rating					BI	QA	-----Reserved-----									
67 <input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	70 <input type="text" value="4"/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	74 <input type="text" value=""/>	75 <input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	80 <input type="text" value=""/>		

#### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Galles and Davis Motor Company, Inc., Albuquerque, Bernalillo County, NM:	Entry Time /Date 1400 hours / 3-12-2014	Permit Effective Date 3-1-2012
	Exit Time/Date 1435 hours / 3-12-2014	Permit Expiration Date 2-28-2017
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. J. Lawton Davis, Owner, Galles and Davis Motor Company, Inc. 505-837-5200	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. J. Lawton Davis, Galles and Davis Motor Company, Inc. 6401 San Mateo Blvd NE, Albuquerque, NM 87109	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

#### Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="text" value="N"/>	Permit	<input type="text" value="N"/>	Flow Measurement	<input type="text" value="N"/>	Operations & Maintenance	<input type="text" value="N"/>	CSO/SSO
<input type="text" value="N"/>	Records/Reports	<input type="text" value="N"/>	Self-Monitoring Program	<input type="text" value="N"/>	Sludge Handling/Disposal	<input type="text" value="N"/>	Pollution Prevention
<input type="text" value="S"/>	Facility Site Review	<input type="text" value="N"/>	Compliance Schedules	<input type="text" value="N"/>	Pretreatment	<input type="text" value="N"/>	Multimedia
<input type="text" value="S"/>	Effluent/Receiving Waters	<input type="text" value="N"/>	Laboratory	<input type="text" value="S"/>	Storm Water	<input type="text" value="N"/>	Other:

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

1. Please see report for further details.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-827-2798	Date 3-25-2014
Signature of Management QA Reviewer Bruce J. Yurdin /s/ Bruce Yurdin	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 3-25-2014

**Galles and Davis Motor Company, Inc.**  
**Compliance Evaluation Inspection**  
**NPDES Permit No. NMS000101**  
**March 12, 2014**

**Further Explanations**

**Introduction**

On March 12, 2014, Sarah Holcomb, accompanied by Shelly Lemon, of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Galles and Davis Motor Company dealership at 6401 San Mateo Blvd NE, Albuquerque, NM 87109 in Bernalillo County. This facility was contacted by the NMDOT District 3 office regarding an illicit discharge into the NMDOT Right of Way along I-25. NMDOT has coverage under the Municipal Separate Storm Sewer System (MS4) permit NMS000101, which requires identification and cessation of illicit non-stormwater discharges within its jurisdiction.

This permit authorizes discharges of stormwater from multiple stormwater outfalls to the Rio Grande in segment 20.6.4.105 NMAC. This segment includes the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, public water supply, wildlife habitat and primary contact. Galles and Davis' illicit discharge was directed to the MS4.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate Galles and Davis' compliance with the NPDES permit. This inspection report is based on information provided by Galles and Davis, observations made by the NMED inspector, and records and reports kept by Galles and Davis, NMDOT, and/or NMED.

The inspectors arranged a meeting with Mr. J. Lawton Davis. Upon arrival at the dealership, the inspector made introductions, presented her credentials and explained the purpose of the inspection. Mr. Davis provided access to the facility. The inspectors and Mr. Davis toured the facility where concerns were noted. An exit interview to discuss preliminary findings was conducted with Mr. Davis on-site. The inspectors left the facility at approximately 1440 hours on the day of this inspection.

**Treatment Scheme**

NMDOT noted discoloration on riprap materials leading to their right of way during routine Illicit Discharge Detection and Elimination inspections. During investigation of the discoloration, NMDOT discovered that the maintenance employees at Galles and Davis were washing out engines onto the pavement at the facility, which was being directed to a drainage area, and then to NMDOT's right of way.

NMDOT contacted Galles and Davis and requested sampling of the water leaving the ponds. The analyses are attached as part of this inspection report (Attachment A).

The following table illustrates the sampling results as compared to New Mexico's Water Quality Standards for the Rio Grande in segment 20.6.4.105 NMAC:

Pollutant	NM Water Quality Standard	Designated Use Standard is Based On	Galles and Davis Monitoring Result
Iron	No standard	--	260 mg/L
Arsenic (dissolved)	100 ug/L	Irrigation	170 ug/L
Barium (dissolved)	2000 ug/L	Drinking water supply (does not apply to segment 20.6.4.105 NMAC)	12000 ug/L
Cadmium (dissolved)	10 ug/L	Irrigation	16 ug/L
Chromium (dissolved)	100 ug/L	Irrigation	86 ug/L
Lead (dissolved)	100 ug/L	Livestock watering	280 ug/L
Mercury (total)	0.77 ug/L	Wildlife habitat	ND (0.0002 mg/L LOQ)
Selenium (total)	5 ug/L	Wildlife habitat	ND (0.2 mg/L LOQ)
Silver (dissolved)	0.3 – 35 ug/L	Acute, hardness of 25 to >400 mg/L CaCO <sub>3</sub>	ND (0.02 mg/L LOQ)

NMDOT referred the issue to NMED to ensure compliance with the enforcement provision of their MS4 requirements, and the visit by NMED staff was then arranged with Mr. Davis.

During the onsite inspection, Mr. Davis informed the inspectors that engine washing is no longer occurring outdoors. The facility has a specific enclosed washing area with its own sump, which is pumped on a routine basis by a contract hauler. The car wash area's discharge consists primarily of water. Mr. Davis thought that at one time a biodegradable soap had been utilized in the operation of the car wash, but was informed by his employees that this is no longer the case. The vehicles are washed only with water, which mostly stays in the wash bay. There is some water that escapes the bay and travels to the discharge area, but Mr. Davis showed the inspectors where he had eliminated the possibility of a routine discharge by building up the concrete berm in that area. (Please see photo #1.)

Based on these observations, the NMED inspectors were satisfied that with the cessation of the engine washing and the elimination of the potential to discharge from the vehicle wash bay that NMDOT's concerns were mitigated.

**NMED/SWQB  
Official Photograph Log  
Photo # 1**

Photographer: Sarah Holcomb	Date: 3-11-2014	Time: 1426 hours
City/County: Albuquerque, Bernalillo County		
Location: Galles and Davis Motor Company on San Mateo		
Subject: The curbing was built up at the facility to prevent a discharge of water from the car wash into NMDOT's right of way.		

