



SUSANA MARTINEZ  
Governor

JOHN SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

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

RAJ SOLOMON, P.E.  
Deputy Secretary

*Certified Mail - Return Receipt Requested*

April 1, 2011

Colonel Stephen A. Clark, Commander  
Cannon Air Force Base New Mexico  
100 S DL Ingram Blvd., Suite 1000  
Cannon AFB, New Mexico 88103-5214

**RE: Industrial Stormwater, SIC 4581 & 9711, NPDES Compliance Evaluation Inspection, Cannon Air Force Base, New Mexico, NMU001720, March 1, 2011**

Dear Colonel Clark,

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) 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 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 to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald  
US Environmental Protection Agency  
Allied Bank Tower  
Region VI Enforcement Branch (6EN-WM)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

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

I appreciate the cooperation of Mr. John Redman during the inspection. If you have any questions about this inspection report, please contact me at (505) 827-0418.

Sincerely,

/s/ Erin S. Trujillo  
Erin S. Trujillo  
Surface Water Quality Bureau

- cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail
- Samuel Tates, USEPA (6EN-AS) by e-mail
- Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
- Diana McDonald, USEPA (6EN-WM) by e-mail
- Frank Fiore, NMED Environmental Health Division (NMED District IV) by e-mail
- John Rebman, Water Quality Program Manager, Environmental, CAFB by e-mail



### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1   N   2   5   3   N   M   U   0   0   1   7   2   0   11   12   1   1   0   3   0   1   17			18   ~	19   S   20	4
Remarks					
U   S   A   I   R   F   O   R   C   E   B   A   S   E					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67       69	70   2	71   N	72   N	73       74	75         80

#### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Cannon Air Force Base NM 88103. From US 60/84 (west of Clovis, NM), take CAFB exit, turn south and follow signs to Visitor Entrance Station. Curry County	Entry Time /Date 0830 hours / 03/01/2011	Permit Effective Date September 29, 2008
	Exit Time/Date 1330 hours / 03/01/2011	Permit Expiration Date September 29, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) John Rebman, Water Quality Program Manager, Environmental, CAFB / 575-784-1099, fax 784-1093	Other Facility Data <u>Facility Entrance</u> Latitude N. 34.405498° Longitude W. -103.317550°	
Name, Address of Responsible Official/Title/Phone and Fax Number Colonel Stephen A. Clark, Cannon Air Force Base New Mexico, 100 S DL Ingram Blvd., Suite 1000, Cannon AFB, New Mexico 88103-5214 / Commander / 575-784-2727	Yes <input type="checkbox"/> Contacted No <input checked="" type="checkbox"/> *	MSGP Sector S / SIC 4581

#### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

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

- Cannon Air Force Base, an operator conducting aircraft maintenance and deicing operations, did not obtain coverage under the USEPA NPDES 2008 industrial stormwater Multi-Sector General Permit (MSGP).**
- See attached further explanations and general area map.**
- A Compliance Evaluation Inspection report for the facility's Waste Water Treatment Plant (WWTP), which has a permit to discharge treated effluent to North Playa Lake and Golf Course Pond (NPDES Permit No. NM0030236), will be submitted under a separate EPA 3560 Form.**

Name(s) and Signature(s) of Inspector(s) <b>Erin S. Trujillo /s/ Erin S. Trujillo</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB/505-827-0418</b>	Date <b>04/01/2011</b>
Signature of Management QA Reviewer <b>Richard E. Powell /s/ Richard E. Powell</b>	Agency/Office/Phone and Fax Numbers <b>NMED/SWQB/505-827-2798</b>	Date <b>04/01/2011</b>

**Cannon Air Force Base  
Compliance Evaluation Inspection – Industrial Stormwater  
NPDES Tracking No. NMU001720**

**March 1, 2011**

**Further Explanations**

**Introduction**

On March 1, 2011, Erin Trujillo of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Cannon Air Force Base (CAFB) New Mexico approximately 5 miles west of Clovis in Curry County, New Mexico. The purpose of this inspection was to document the facility operator's status regarding the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges associated with industrial activity under 40 Code of Federal Regulations (CFR) 122.26 and the industrial stormwater Multi-Sector General Permit (MSGP).

CAFB has aircraft maintenance and deicing activities that meet the description in 40 CFR 122.26(b)(14) category (viii), and Sector S (Air Transportation Facilities) of the MSGP. Stormwater discharges are to unclassified surface waters, then to Blackwater Draw in the Brazos Headwaters Sub-basin, Texas-Gulf Basin tributary to the Brazos River in Texas.

The inspector arrived at the CAFB at approximately 0830 hours on the day of the inspection. The inspector made introductions, explained the purpose of the inspection and presented credentials to Mr. John Rebman, Water Quality Program Manager, Environmental, CAFB. On the day of the inspection, a CEI was also conducted at the facility's Waste Water Treatment Plant (WWTP) to determine compliance under the facility's individual NPDES permit (NM0030236) for discharge of treated effluent to North Playa Lake and Golf Course Pond (findings will be submitted under a separate EPA 3560 Form). The inspector and Mr. Rebman also toured the surface waters receiving stormwater runoff at the facility. Following the inspection, an exit interview to discuss preliminary findings was conducted with Mr. Rebman. The inspector left the facility at approximately 1330 hours on March 1, 2011.

This report is based on review of EPA's on-line notice of intent (eNOI) database, files maintained by NMED, on-site observation by NMED personnel, and verbal information provided by the operator representative.

**Clean Water Act (CWA) and Industrial Stormwater Permit Requirements**

Section 301 (a) of the Federal Water Pollution Control 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."* Federal regulations in 40 CFR 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."*

To obtain permit coverage under USEPA MSGP, an operator must complete a Stormwater Pollution Prevention Plan (SWPPP) that among other things documents eligibility for permit coverage, and submit a Notice of Intent (NOI) to the USEPA. USEPA's MSGP was re-issued effective September 29, 2008 (Federal Register/Vol. 73, No. 189/Monday, September 29, 2008 pg. 56572) and replaced the 2000 MSGP which expired on October 30, 2005.

USEPA's MSGP and additional information is available at:

[http://cfpub1.epa.gov/npdes/stormwater/msgp.cfm#permit\\_factsheet](http://cfpub1.epa.gov/npdes/stormwater/msgp.cfm#permit_factsheet)

Under the MSGP, a SWPPP is intended to describe the potential pollutant sources and document the selection, design, and installation of control measures. In addition, USEPA's MSGP requires routine facility inspections, quarterly visual assessment of discharges, comprehensive site inspections, documentation, recordkeeping and annual reporting. Operators must also comply with Part 8 sector-specific requirements associated with the facility's primary industrial activity and any co-located industrial activities, as defined in Appendix A of the 2008 MSGP, including benchmark monitoring of stormwater discharges as applicable.

The following sectors have specific requirements for stormwater discharges associated with industrial activity under the MSGP:

- Sector S (air transportation facilities, including SIC 4581 airports, flying fields, and airport terminal services). The MSGP authorizes stormwater discharges from only those portions of the air transportation facility that are involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication), equipment cleaning operations or deicing operations.
- Sector K (hazardous waste treatment, storage, or disposal facilities (TSDFs), including those that are operating under interim status or a permit under subtitle C of RCRA). Disposal facilities that have been properly closed and capped, and have no significant materials exposed to stormwater, are considered inactive and do not require permits.
- Sector N (scrap recycling and waste recycling facilities)
- Sector T (treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage, treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that are located within the confines of the facility, with a design flow of 1.0 million gallons per day (MGD) or more, or required to have an approved pretreatment program under 40 CFR Part 403). Not included are farm lands, domestic gardens or lands used for sludge management where sludge is beneficially reused and which are not physically located in the confines of the facility, or areas that are in compliance with section 405 of the CWA.

An industrial stormwater fact sheet series is available at USEPA's website:

<http://cfpub1.epa.gov/npdes/stormwater/swsectors.cfm>

These fact sheets for each MSGP sector provide a brief summary of the NPDES industrial stormwater permitting program, the types of facilities included in that sector, a summary of typical pollutants associated with each sector, and types of stormwater control measures (best management practices or BMPs) used to minimize the discharge of those pollutants.

### **On-site Industrial Activities**

Runoff from vehicle maintenance, equipment cleaning operations and deicing operations at CAFB is to the on-site South Playa Lake. At air transportation facilities, examples of pollutants from common activities (e.g., aircraft and runway deicing/anti-icing, aircraft servicing and fueling, aircraft and ground vehicle equipment maintenance and washing, and runway maintenance) include:

- Biochemical oxygen demand, nitrogen and ammonia;
- Engine oil, hydraulic fluid, fuel, lavatory waste;
- Jet fuel, fuel additives, oil, lubricants, heavy metals;
- Engine oils, hydraulic fluids, transmission oil, radiator fluids, and chemical solvents;

- Batteries, oil, fuel filters, oily rags;
- Total Suspended Solids (TSS), metals, fuel, hydraulic fluid, oil, lavatory waste;
- Tire rubber, oil and grease, paint chips, jet fuel; and
- Chemical solvents.\*

According to the on-site operator representative, Sector N and K co-located activities no longer exist at the facility. CAFB obtained “No Further Action” status for 32 Solid Waste Management Units and Areas of Concern (NMED Hazardous Waste Bureau Permit NM7572124454 letter dated February 27, 2006).

Runoff from the WWTP is to the on-site North Playa Lake. CAFB is planning to increase the design flow of the on-site WWTP to 1 MGD. Examples of pollutants from common activities at treatment works (e.g., sludge drying beds and storage piles; sludge transfer; grit and scum piles from clarifiers, screens, exposed soil; and equipment/vehicle maintenance and storage) include Nitrate, Total Dissolved Solids (TDS), TSS, ammonia, pathogens, oil, fuel, hydraulic fluids, heavy metals, bacteria, and nitrate.\*

*\*Source: Table 1, Industrial Stormwater Fact Sheet Series for Sector S: Vehicle Maintenance Areas, Equipment Cleaning Areas, or Deicing Areas Located at Air Transportation Facilities and Sector T: Treatment Works, U.S. EPA Office of Water, EPA-833-F-06-034 and EPA-833-F-06-035, respectively, December 2006.*

## **Findings**

CAFB, an operator of aircraft maintenance and deicing activities, did not obtain coverage under the USEPA NPDES 2008 MSGP. CAFB submitted a NOI to obtain permit coverage under the 2000 MSGP on January 28, 2001 (expired NPDES Tracking No. NMR05A984). For existing dischargers covered under the 2000 MSGP, the deadline for submitting an NOI was January 5, 2009. According to the on-site operator representative, CAFB decided not to obtain permit coverage under the 2008 MSGP for stormwater discharges from air transportation facility industrial activity to the on-site South Playa Lake because they believe that there are no discharges to Waters of the U.S.

It is noted that upon completion of the WWTP facility upgrade, CAFB will become an operator of a treatment works. The NOI submission deadline for new dischargers that start discharging after January 5, 2009 is a minimum of 60 days prior to commencing discharge, or a minimum of 30 days if the SWPPP is posted on the Internet during this period.

If not properly managed or minimized in accordance with the USEPA’s NPDES MSGP, pollutants in stormwater and any allowable non-stormwater discharges from this facility’s industrial activity are a potential threat to water quality.

<b>NMED/SWQB General Area Map</b>		
Created by: Erin S. Trujillo		
City/County: Clovis / Curry County		State: New Mexico
Location: South and North Playa Lake at Cannon Air Force Base		

