



**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

***Surface Water Quality Bureau***

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Deputy Secretary**

**ERIKA SCHWENDER  
Director**

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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 13, 2013

Mr. Rob Perry, Chief Administrative Officer  
City of Albuquerque  
P.O. Box 1293  
Albuquerque, NM 87103

Re: Industrial Storm Water, SIC 4173, NPDES Compliance Evaluation Inspection, City of Albuquerque Pino Yards Maintenance Yard, NMU001861, August 2, 2013

Dear Mr. Perry,

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 Mr. Martin Raimondi 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  
Industrial and Stormwater Team Leader  
Surface Water Quality Bureau

Cc: Jan Walker, USEPA (6EN-AS) via email  
Rashida Bowlin, USEPA (6EN-AS) via email  
Carol Peters-Wagon, USEPA (6EN-WM) via email  
Bart Butler, PSTB, NMED, via email  
Darlene Whitten-Hill, USEPA, via email  
NMED District I Manager, via email  
Diana McDonald, USEPA (6EN-WM) via email  
Martin Raimondi, CABQ, via email



**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   8   6   1   11   12   1   3   0   8   0   2   17   18   ~   19   S   20   2					
Remarks					
M   U   N   I   C   I   P   A   L   M   A   I   N   T   E   N   A   N   C   E   Y   A   R   D					
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 ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) CITY OF ALBUQUERQUE PINO MAINTENANCE YARD; ALBUQUERQUE, BERNALILLO COUNTY, NM: In ABQ, at the intersection of I-25 and Paseo del Norte, head East on Paseo del Norte and turn south on San Pedro. Turn west on Pino Ave and the entrance to the yards is on the right.	Entry Time /Date 0820 hours/8-2-2013	Permit Effective Date 9-29-2008
	Exit Time/Date 0920 hours/8-2-2013	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Martin Raimondi, Assistant Fleet Manager (505) 857-8013	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Rob Perry, Chief Administrative Officer, City of Albuquerque PO Box 1293, Albuquerque, NM 87103	<p>GPS at facility office: N. 35° 10' 6.91" W. -106° 34' 50.86"</p> <p>SIC 4173</p>	<p>Contacted</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>

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

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

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

- Inspector arrived at the facility at 0820 hours on August 2, 2013, and conducted an entrance interview with Mr. Martin Raimondi, Assistant Fleet Manager, where the inspector made introductions, presented credentials, and discussed the purpose of the inspection. Mr. Raimondi accompanied the inspectors on a tour of the site. The inspector conducted an exit interview with Mr. Raimondi at the facility at approximately 0905-0910 hours, where the preliminary findings of the inspection were discussed.
- Please see report for further information.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 8-13-2013
Signature of Management QA Reviewer Bruce Yurdin /s/ Bruce Yurdin	Agency/Office/Phone and Fax Numbers 505-827-2795	Date 8-13-2013

Compliance Evaluation Inspection  
City of Albuquerque Pino Yards, Sector P  
NPDES Permit #NMU001861, August 2, 2013

**Further Explanations**

**Introduction**

On August 2, 2013, a Compliance Evaluation Inspection was conducted at the City of Albuquerque Pino Maintenance Yards (Standard Industrial Classification Code 4173) located in Albuquerque, NM by Sarah Holcomb of the State of New Mexico Environment Department (NMED) Surface Water Quality Bureau (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 P) and stormwater regulations at **40 Code of Federal Regulations (CFR) Part 122.26**.

This inspection was triggered by a report made to the NMED emergency hotline due to a 100+ gallon oil spill on the property. The inspector arrived at the facility at 0820 hours. An entrance interview was conducted with Mr. Martin Raimondi, Assistant Fleet Manager, during which the inspector made introductions, presented her credentials and discussed the purpose of the inspection. Mr. Raimondi, as well as a representative from the subcontractor RMCI, accompanied the inspector on a tour of the facility and explained processes and management measures already in place, in addition to the procedures followed on Thursday, August 1, that created the spill.

The City of Albuquerque has hired a subcontractor, RMCI, Inc. who is performing maintenance activities at the Pino Yards site, and was in the process of removing an old oil/water separator. According to facility representatives, RMCI staff attempted to pump out the materials in the separator, but were not successful in removing all of the material. When pulling the separator out of the ground, the gaskets on the separator broke, spilling the residual oil/water mixture that the staff were not successful in removing. Notification was made to the NMED Emergency Hotline, and Mr. Bart Butler of the NMED Petroleum Storage Tank Bureau (PSTB) initially responded to the report and documented the spill, as well as cleanup efforts later in the afternoon on August 1.

Storm water from this facility collects in an onsite retention pond, and 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, wildlife habitat, public water supply 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."*

According to a review of EPA's NOI database, 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 P – Land Transportation and Warehousing – under SIC 4173 (Terminal and Service Facilities for Motor Vehicle Passenger Transportation) but may also have other secondary SIC codes that apply due to the presence of other industrial activities on site. Part of this facility is also leased to the Albuquerque Bernalillo County Water Utility Authority, who mainly uses offices on site, but also houses their vehicles at the facility.

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

- **Fueling:** This activity can be a source of pollutants such as fuel, oil, and heavy metals. These pollutants can come from sources such as spills and leaks during fuel delivery, spills caused by “topping off” fuel tanks, rainfall falling on the fuel area or storm water running onto the fuel area, hosing or washing down fuel area, or leaking storage tanks.
- **Vehicle and Equipment Maintenance:** This activity can be a source of pollutants such as chlorinated solvents, oil, heavy metals, acid/alkaline wastes, ethylene glycol, arsenic, and organics. These pollutants can come from sources such as parts cleaning, waste disposal of greasy rags, oil filters, air filters, batteries, hydraulic fluids, transmission fluids, radiator fluids, degreasers, spills of oil, and fluids replacement.
- **Outdoor Vehicle and Equipment Storage and Parking:** This activity can be a source of pollutants such as oil, hydraulic fluids, arsenic, heavy metals, organics and fuel. These pollutants can come from sources such as leaking vehicle fluids, leaking or improperly maintained locomotive onboard drip collection systems, and brake dust.
- **Painting Areas:** This activity can be a source of pollutants such as paint, spent chlorinated solvents, heavy metals, and dust. These pollutants can come from sources such as paint and paint thinner spills, spray painting, sanding or paint stripping, and paint cleanup.
- **Vehicle or Equipment Washing Areas:** This activity can be a source of pollutants such as oil, detergents, heavy metals, chlorinated solvents, phosphorus, salts and suspended solids. These pollutants can come from sources such as washing or steam cleaning.
- **Liquid Storage in Above Ground Storage:** This activity can be a source of pollutants such as fuel, oil, heavy metals, and materials being stored. These pollutants can come from sources such as installation problems, spills or overfills due to operator error, and failure of piping systems.
- **Asphalt Material Storage and Handling:** This activity can be a source of pollutants such as Total Suspended Solids (TSS), oil and grease, pH and Chemical Oxygen Demand. These pollutants can come from sources such as additives, asphalt, asphalt cement, asphalt concrete, asphalt products, asphalt release agents, crushed stone, fuel, granite, granules, gravel, limestone, lubricants, mineral spirits, oil, quartzite rock, reclaimed asphalt pavement, sand, sandstone, and slag.

**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.**

Among other things, this facility is required to monitor storm water discharges from this site in accordance with Part 8.D.4 (Sector-Specific Benchmarks) of the permit to include analytical results for Total Suspended Solids (TSS), pH and oil and grease.

### **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) oil and residuals from the reported oil spill, 2) vehicles stored outdoors, and 3) wash water being discharged to the asphalt pavement.

An exit interview to discuss the preliminary findings of this inspection was conducted onsite with Mr. Raimondi at approximately 0905-0910 hours. The inspector informed Mr. Raimondi 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).

NMED/SWQB

**Official Photograph Log**

Photo # 1

Photographer: Bart Butler	Date: 8-1-2013	Time: 1123 hours
City/County: Albuquerque, Bernalillo County		
Location: City of Albuquerque Pino Yards near I-25 and Paseo del Norte, Albuquerque, NM		
Subject: Area where the spill originated by removal of an underground oil/water separator.		



NMED/SWQB

**Official Photograph Log**

Photo # 2

Photographer: Bart Butler	Date: 8-1-2013	Time: 1109 hours
City/County: Albuquerque, Bernalillo County		
Location: City of Albuquerque Pino Yards near I-25 and Paseo del Norte, Albuquerque, NM		
Subject: Amount of oil that initially made it to the on-site retention pond. Outlet of the pond (which goes directly to the North Pino Arroyo via a non-functioning (according to facility representatives) oil/water separator.		



**Official Photograph Log**

Photo # 3

Photographer: Sarah Holcomb	Date: 8-2-2013	Time: 0912 hours
City/County: Albuquerque, Bernalillo County		
Location: City of Albuquerque Pino Yards near I-25 and Paseo del Norte, Albuquerque, NM		
Subject: Area where the spill originated. Oil had been absorbed with kitty litter/absorbent material and swept for most of the spill. Inspector instructed the yards staff that the absorbent material should also be removed promptly to avoid being transported to the MS4 in the event of rain.		



**Official Photograph Log**

Photo # 4

Photographer: Sarah Holcomb	Date: 8-2-2013	Time: 0918 hours
City/County: Albuquerque, Bernalillo County		
Location: City of Albuquerque Pino Yards near I-25 and Paseo del Norte, Albuquerque, NM		
Subject: On-site retention pond on the day of the inspection. Oil that flowed to the pond had been captured and soils that were contaminated were removed and were awaiting proper disposal in a dumpster located on the property.		

