



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

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**Certified Mail – Return Receipt Requested**

August 10, 2011

Ms. Liz Sanchez, Senior Regional Vice President of Operations  
First Student, Inc.  
1192 N. 27<sup>th</sup> Ave.  
Phoenix, AZ 85009

**Re: Industrial Storm Water, SIC 4151, NPDES Compliance Evaluation Inspection, STS of New Mexico Facility, NMU001752, July 26, 2011**

Dear Ms. Sanchez,

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 was provided during my visit to your site by Mr. Rick Ramirez. 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  
Environmental Scientist/Specialist  
Surface Water Quality Bureau

Cc: Marcia Gail Adams, USEPA (6EN-AS) via e-mail  
Samuel Tate, USEPA (6EN-AS) via e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail  
Diana McDonald, USEPA (6EN-WM) via e-mail  
Frank Fiore, NMED District III (via 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   5   2   11   12   1   1   0   7   2   6   17   18   ~   19   S   20   2					
Remarks					
S E C T O R P					
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) <b>STS OF NEW MEXICO/FIRST STUDENT FACILITY: FROM I-25, TAKE THE N MAIN ST EXIT AND HEAD WEST. TURN RIGHT ON PICACHO. LEFT ON N 17<sup>TH</sup> ST. FACILITY IS AT 533 N. 17<sup>TH</sup>.</b>	Entry Time /Date 1315 HOURS / 7-26-2011	Permit Effective Date 9-29-2008
	Exit Time/Date 1350 HOURS / 7-26-2011	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. RICK RAMIREZ, MANAGER (575) 523-5686	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number MS.LIZ SANCHEZ, VICE PRESIDENT OF OPERATIONS (602) 484-7646 1192 N. 27 <sup>TH</sup> AVENUE, PHOENIX, AZ 85009	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	LAT/LONG: N. 32° 18' 24.37" W. -106° 48' 17.70"  SIC 4151

#### 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	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

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

1. PLEASE SEE FURTHER EXPLANATIONS FOR FURTHER DETAIL.

Name(s) and Signature(s) of Inspector(s) Sarah S. Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 8-10-2011
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 8-10-2011

**Compliance Evaluation Inspection  
STS of New Mexico/First Student Inc., Sector P  
NPDES Permit #NMU001752, July 26, 2011**

**Further Explanations**

**Introductions**

On July 26, 2011, a Compliance Evaluation Inspection was conducted at the STS of New Mexico/First Student Inc. facility (Standard Industrial Classification 4151) located in Las Cruces, New Mexico 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 facility is a school bus company located in Las Cruces, NM. There are approximately 156 buses at this site. Maintenance activities are housed indoors, with a grated drain that is directed to the sanitary sewer, under the city's Industrial Pretreatment Program. There are 2 structural ponds on site to contain stormwater. Drivers check the buses for leaks daily – if leaks are found, then the bus is brought into the maintenance area immediately for repairs. Mr. Rick Ramirez, the facility manager, does monthly comprehensive walking inspections of the site but does not document them.

Storm water from this facility discharges into the Rio Grande in 20.6.4.101 NMAC of the Lower Rio Grande Basin (*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 and primary contact.

The inspector arrived at the facility at 1315 hours. The inspector conducted an entrance interview with Mr. Rick Ramirez, Manager, during which the inspector made introductions, presented her credentials and discussed the purpose of the inspection. Mr. Ramirez explained that STS of New Mexico was leasing the property from First Student, Inc., who had left New Mexico about a year prior to this inspection, and had taken all permitting and compliance information with them at that time. However, Mr. Ramirez was aware of the requirement to obtain permit coverage and to conduct inspections. Mr. Ramirez indicated that he does conduct periodic walkaround inspections of the facility, but does not document them. Mr. Ramirez also accompanied the inspector on a tour of the entire facility and explained processes and management measures already in place.

This report is based on verbal information reported by the facility representatives, 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. 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."*

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 Section P – Land Transportation and Warehousing – under SIC 4151.

A Storm Water Pollution Prevention Plan (SWPPP) had allegedly been prepared in written form, however, it was not available at the site for inspection, 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 the 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, preventive 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 land transportation facility can result in the creation of various pollutant sources that include, but are not limited to, the following:**

- **Fueling:** These activities 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 onto the fuel area or storm water running onto the fuel area, hosing or washing down the fuel area, or leaking storage tanks.
- **Vehicle and equipment maintenance:** These activities can be a source of pollutants such as chlorinated solvents, oil, heavy metals, acid/alkaline wastes, ethylene glycol, organics and arsenic. 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, and spills of oil.
- **Outdoor vehicle and equipment storage and parking:** These activities 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 including hydraulic lines and radiators, leaking or improperly maintained locomotive on-board drip collection systems, and brake dust.
- **Painting areas:** These activities can be a source of pollutants such as paint, spent chlorinated solvents, dust and heavy metals. These pollutants can come from sources such as paint and paint thinner spills, spray painting, sanding or paint stripping and paint clean-up.
- **Vehicle or equipment washing areas:** These activities 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:** These activities can be a source of pollutants such as fuel, oil, heavy metals, and materials being stored. These pollutants can come from sources such as external corrosion and structural failure, installation problems, spills and overfills due to operator error, and failure of piping systems (pipes, pumps, flanges, couplings, hoses, and valves).

**If not properly managed or treated in accordance with an NPDES permit, activities associated with the activities at this facility could be a potential threat to water quality through storm water discharges.**

#### **Site Inspection Summary**

The MSGP was reissued in 2008.

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) outdoor vehicle storage and 2) an outside AST for fueling.

For additional information on BMPs and SWPPPs for Sector P, please refer to pages 50977-50984 in the document entitled *Final NPDES Storm Water Multi-Sector General Permit for Industrial Activities (Federal Register/Vol. 60, No. 189, Friday, September 29, 1995)*. This document can be downloaded from “Storm Water Archived Publications” at:

[https://cfpub2.epa.gov/npdes/docs.cfm?view=archivedprog&program\\_id=6&sort=date\\_published](https://cfpub2.epa.gov/npdes/docs.cfm?view=archivedprog&program_id=6&sort=date_published). This is an older, discontinued permit (1995 MSGP) but contains helpful background information that was not carried over to either the 2000 or 2008 MSGP.

An exit interview to discuss the preliminary findings of this inspection was conducted at the facility with Mr. Ramirez at approximately 1545-1550 hours. The inspector informed the facility representative 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). After the inspection, the inspector contacted Mr. Steve Wright by phone on August 9, 2011 to inform him of the inspection findings and subsequent inspection report.