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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARKLIN
Secretary

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Acting Deputy Secretary

Certified Mail - Return Receipt Requested

October 4, 2011

Mr. Bob Horacek, City Manager
P.O. Box 879, 600 W. Santa Fe
Grants, NM 87020

**RE: Industrial Storm Water; SIC 4581; NPDES Compliance Evaluation Inspection; Grants-Milan
Municipal Airport; NPDES Permit NMU001768; September 29, 2011**

Dear Mr. Horacek:

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 your cooperation and assistance during this inspection. If you have any questions about this inspection report, please contact me at (505) 827-2575.

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Surface Water Quality Bureau

Cc: Marcia Gail Adams, EPA, Enforcement Section by e-mail
Carol Peters-Wagnon, EPA by e-mail
Diana McDonald, EPA by e-mail
Samual Tate, EPA, by e-mail
Darlene Whitten-Hill, EPA, by e-mail
NMED District I 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 N 2 5 3 N M U 0 0 1 7 6 8 11 12 1 1 0 9 2 9 17 18 ~ 19 S 20 2					
Remarks					
M U N I C I P A L A I R P O R T					
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) Grants-Milan Airport: From Interstate 40 west of Grants, exist onto Horizon Blvd, south under the freeway to Motel, east on Motel which changes to Airport Road, Airport can be seen from road. Cibola County	Entry Time /Date 1044 Hours / 9-29-2011	Permit Effective Date 9-29-2008
	Exit Time/Date 1145/ 9-29-2011	Permit Expiration Date 9-29-2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Wes Hobbs/ Airport Director/ 505-287-4700	Other Facility Data N. 35° 10' 02.20" W. -107 °54' 07.40"	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Bob Horacek, P.O. Box 879, 600 W. Santa Fe Ave., Grants NM, 87020/City Manager/505-287-7927	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	

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
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
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

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

- 1) City of Grants (expired NPDES permit NMR05B128), operator of a transportation airport facility with limited maintenance and fueling activities, did not obtain coverage under the USEPA NPDES industrial stormwater 2008 Multi-Sector General Permit (MSGP) by the deadline of January 5, 2009.
- 2) An on-site Stormwater Pollution Plan (SWPPP) was prepared under the 2000 MSGP, but there was no documentation that required inspections, training, monitoring and evaluations were implemented.
- 3) See attached further explanations.

Name(s) and Signature(s) of Inspector(s) DANIEL VALENTA /s/Daniel Valenta	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2575	Date 10/4/2011
Signature of Management QA Reviewer RICHARD E. POWELL /s/Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 10/4/2011

**City of Grants-Milan Municipal Airport
Compliance Evaluation Inspection – Industrial Stormwater
NPDES Permit NMU001768
September 29, 2011**

Further Explanations

Introduction

On September 29, 2011, a Compliance Evaluation Inspection (CEI) was conducted at the Grants-Milan Municipal Airport by Daniel Valenta, of the 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 permit requirements for stormwater discharges associated with industrial activity under 40 Code of Federal Regulations (CFR) 122.26(b)(14) and the industrial stormwater Multi-Sector General Permit (MSGP).

Storm water runoff from this facility may discharge to a bar ditch alongside the airport, and thence to the Rio San Jose in segment 20.6.4.98 of the *State of New Mexico Standards for Interstate and Intrastate Surface Waters*, thence to the Rio Puerco, thence to the Rio Grande.

Upon arrival at 1044 hours on September 29, 2011, the inspector made introductions, stated the purpose of the inspection and presented credentials to Mr. Wes Hobbs, Airport Manager, Grants-Milan Municipal Airport. The Grants-Milan Municipal Airport is a Public-Use General Aviation Airport Facility located in Cibola County, New Mexico, approximately 3 miles northwest of Grants, New Mexico. The airport is governed by the City of Grants, NM.

The inspector toured the facility. An on-site exit interview to discuss preliminary findings was conducted with Mr. Hobbs. The inspector left the facility at approximately 1145 hours on the day of the inspection. This report is based on review of EPA's on-line notice of intent (eNOI) database, files maintained by the operator and NMED, and on-site observation by NMED personnel, and verbal information provided by the operator's on-site 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."*

Regulations in 40 Code of Federal Regulations (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."* In 40 CFR 122.26(b)(14)(i)-(xi), eleven (11) categories of stormwater discharges associated with industrial activity are identified that require to be covered under an NPDES permit. Category Eight (viii) are transportation facilities that have vehicle maintenance, equipment cleaning, or airport deicing operations.

Storm water discharges can be regulated by either an individual or a general USEPA NPDES permit. USEPA's Storm Water Multi-Sector General Permit (MSGP) for industrial activities re-issued effective September 29, 2008 authorizes stormwater discharges from 29 sectors of industrial activity. The 29 sectors are defined by either the facility's Standard Industrial Classification (SIC) code and/or a general description of the facility's industrial activities.

**City of Grants-Milan Municipal Airport
Compliance Evaluation Inspection – Industrial Stormwater
NPDES Permit NMU001768
September 29, 2011**

Establishments primarily engaged in operating and maintaining airports and flying fields are described in SIC 4581 Airports, Flying Fields, and Airport Terminal Services (see Sector S, Appendix D of the 2008 MSGP). Part 8.S.2.1 (Limitations on Coverage) of the 2008 MSGP states, *“This permit 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.”*

To obtain permit coverage for stormwater discharges, 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). If eligible, operators may also submit a No Exposure Certification to USEPA once every five years.

USEPA’s MSGP is available at http://cfpub1.epa.gov/npdes/stormwater/msgp.cfm#permit_factsheet. Also, USEPA’s industrial fact sheet series at <http://cfpub1.epa.gov/npdes/stormwater/swsectors.cfm> provides 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 for each industrial sector.

On-site Industrial Activity Description

The facility has fueling activities and minor repairs take place that meet the description of transportation industrial activity in 40 CFR 122.26(b)(14)(xiii) and Sector S of the MSGP. The City of Grants owns and operates the Grants-Milan Municipal Airport, which sits on 365 acres west of town, constructed in 1952 with 2 runways, a helipad, aircraft parking, administrative building, aircraft storage hangars and fuel facilities.

The city of Grants-Milan Municipal Airport conducts aircraft fueling on aircraft aprons. Aircraft are refueled at the above ground fuel tank (100LL fuel), located east of the apron, and anywhere on the aircraft apron by a fuel truck (Jet A fuel), which is normally parked near the maintenance building when not in-service. Fuel is stored in one above ground storage tank. The storage tank is located east of the apron, and is situated within a secondary containment sealed cinder block wall on a concrete pad. The secondary containment walls are capable of containing approximately 13,000 gallons. Fuel is transferred into the tank from tanker trucks. Minor aircraft maintenance takes place primarily indoors in the private hanger. Aircraft are washed outdoors by private owners. No aerial applicators of agricultural chemicals are based at the airport, and no anti- or de-icing activities occur.

There is only one drainage Channel through the airport. Runoff from this facility may discharge from an earthen ditch that has a fairly flat gradient. There is a potential for minor oil and grease deposits discharging from the apron surfaces as well as suspended solids once stormwater reaches and fills the earthen ditches.

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September 29, 2011**

Findings

The city of Grants submitted/certified a NOI on March 22, 2002 for the Grants-Milan Municipal Airport and obtained permit coverage under the 2000 MSGP (expired NPDES Permit NMR05B128). The deadline for submitting an NOI under the 2000 MSGP was December 29, 2000.

An on-site SWPPP dated February 2007 was prepared under the 2000 MSGP by Armstrong Consultants, Inc. in Grand Junction CO. There was no documentation contained in the 2007 SWPPP that the following 2000 MSGP conditions were implemented:

- Routine Facility Inspections (Part 4.2.7.2.1.5 of the 2000 MSGP)
- Employee Training (Part 4.2.7.2.1.6 of the 2000 MSGP)
- Quarterly Visual Monitoring (Part 5.1.1 of the 2000 MSGP)
- Yearly Comprehensive Site Compliance Evaluation (Part 4.9 of the 2000 MSGP)
- Documentation of Permit Eligibility Related to Endangered Species (see Part 4.5 of the 2000 MSGP) was also not contained in the SWPPP.

The city of Grants did not submit a NOI or obtain authorization to discharge industrial stormwater under the 2008 MSGP. The deadline for existing dischargers covered under the 2000 MSGP to update and complete a SWPPP, and submit a new NOI was no later than January 5, 2009. An updated/completed SWPPP in accordance with the 2008 MSGP requirements had not been developed. According to the on-site representative, the City of Grants had at one time contracted with a consultant to prepare a SWPPP.