

Region 6 Compliance Assurance and Enforcement Division

sMS4 Inspection Report

Inspection Date(s):	12/9/2019		
Media:	Water		
Regulatory Program(s)	CWA Storm Water		
Company Name:	City of Santa Fe		
Facility Name:	City of Santa Fe		
Facility Physical Location:	500 Market Street, Suite 200		
(city, state, zip code)	Santa Fe, New Mexico 87501		
Mailing address:	500 Market Street, Suite 200		
(city, state, zip code)	Santa Fe, New Mexico 87501		
County/Parish:	Santa Fe County		
Facility Contact:	Melissa McDonald	River and Watershed Manager	
	mamcdonald@santafenm.gov		
FRS Number:	N/A		
Identification/Permit Number:	NMR040000		
Media Number:	N/A		
NAICS:	921110		
SIC:	9111		
Personnel participating in inspection:			
Stephanie Meyers	US EPA/6ECDWR	Life Scientist	214-665-6496
Carol Johnson	US EPA/6ECDWR	Life Scientist	214-665-8471
David Esparza	US EPA/6ECDWM	Environmental Engineer	505-366-8402
Jennifer Foote	NMED	Supervisor	505-827-0596
Melissa McDonald	City of Santa Fe	Rivers and Watershed Manager	505-955-6840
Dee Beingessner	City of Santa Fe	City Engineer	505-955-6641
Alex Puglisi	City of Santa Fe	NPDES Compliance Specialist	505-955-4232
Victor Lucero	City of Santa Fe	Program Manager	505-955-2117
Dave Pike	City of Santa Fe	Stormwater Project Admin	505-955-2134
Sam Burnett	City of Santa Fe	Project Administrator	505-955-6853
EPA Lead Inspector Signature/Date			
	Stephanie Meyers		Date
Supervisor Signature/Date			
	Curry Jones		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Stephanie Meyers, Carol Johnson, and David Esparza, as well as New Mexico Environment Department Industrial and Stormwater Team Supervisor, Jennifer Foote arrived at the City of Santa Fe (City) offices at 9:00am on December 9, 2019, for an announced inspection. We met with Melissa McDonald, Rivers and Watershed Manager; Dee Beingessner, City Engineer; Alex Puglisi, NPDES Compliance Specialist; Victor Lucero, Program Manager; David Pike, Stormwater Project Admin; and Sam Burnett, Project Administrator. I informed representatives of the City that this was an EPA inspection to determine compliance with the City's NPDES Small Municipal Separate Storm Sewer System (MS4) Phase II Permit and the Clean Water Act. The inspection was conducted under the authority of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the Federal Clean Water Act.

FACILITY DESCRIPTION

The City of Santa Fe is a Phase II MS4 that discharges to surface waters of the United States. The City is responsible for compliance with permit conditions relating to discharges from portions of the MS4 for which it is the operator, and Storm Water Management Program (SWMP) implementation on portions of the MS4 for which it is the operator.

Section II - OBSERVATIONS

The areas evaluated during the inspection will be rated in the sMS4 Overview found in Appendix 3. Before exiting the facility, an exit briefing was conducted to discuss our findings. During the exit briefing, we informed the City of areas of concerns noted during the inspection.

Section III – AREAS OF CONCERN

Several areas of concern were found during the inspection:

- 1) At the City's Service Center, we observed that overall, good housekeeping was lacking. Paint storage containers were left exposed and open (Photo 1), paint storage tanks were also exposed (Photo 2), runoff from the Service Center drains to two ditches, one of which is directly connected to an irrigation channel (Photo 4), vehicle wash materials covered a portion of the site and were draining to the ditch next to the irrigation channel (Photos 7, 8, and 10), road paint was being tested not far from the drain connected to the ditch (Photo 11), and the spill kit is not easily accessible as it is locked inside a building (Photo 13).

- 2) The Service Center does not have a Multi-Sector General Permit.
- 3) The City does not have an electronic database to maintain records.
- 4) The City's storm water team seems to be understaffed with just one full time employee, and unorganized regarding each individual's role on the team.

Section IV – FOLLOW UP

After the December 9, 2019 inspection, EPA received an email from Melissa McDonald on January 3, 2020, containing information on the City's Storm Water Management Program.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log

Appendix 2 – Sign-in Sheet

Appendix 3 – SMS4 Overview

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0697

Date and Time of Photo: 12/9/2019, 12:12pm

Photographer: Stephanie Meyers

Description: Road paint storage uncovered, some containers open



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0699

Date and Time of Photo: 12/9/2019, 12:14pm

Photographer: Stephanie Meyers

Description: Underground road paint storage tanks



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0707

Date and Time of Photo: 12/9/2019, 12:45pm

Photographer: Stephanie Meyers

Description: Salt and other de-icing materials stored on site, contained by concrete barrier



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0710

Date and Time of Photo: 12/9/2019, 12:54pm

Photographer: Stephanie Meyers

Description: First ditch where materials from Service Center drain to, overflow pipe and spillway connecting ditch to irrigation channel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0711

Date and Time of Photo: 12/9/2019, 12:56pm

Photographer: Stephanie Meyers

Description: Low point at the Service Center, which drains to a second ditch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0713

Date and Time of Photo: 12/9/2019, 1:02pm

Photographer: Stephanie Meyers

Description: Minimal staining where vehicles are stored



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0714

Date and Time of Photo: 12/9/2019, 1:03pm

Photographer: Stephanie Meyers

Description: Drainage inlet, which empties to ditch near irrigation channel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0715

Date and Time of Photo: 12/9/2019, 1:04pm

Photographer: Stephanie Meyers

Description: Vehicle wash materials inside drainage inlet



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0717

Date and Time of Photo: 12/9/2019, 1:05pm

Photographer: Stephanie Meyers

Description: Oil leaking near drainage inlet



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0718

Date and Time of Photo: 12/9/2019, 1:07pm

Photographer: Stephanie Meyers

Description: Vehicle wash materials puddling near drainage inlet



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0720

Date and Time of Photo: 12/9/2019, 1:08pm

Photographer: Stephanie Meyers

Description: Testing road paint near drainage inlet that goes to ditch next to irrigation channel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM

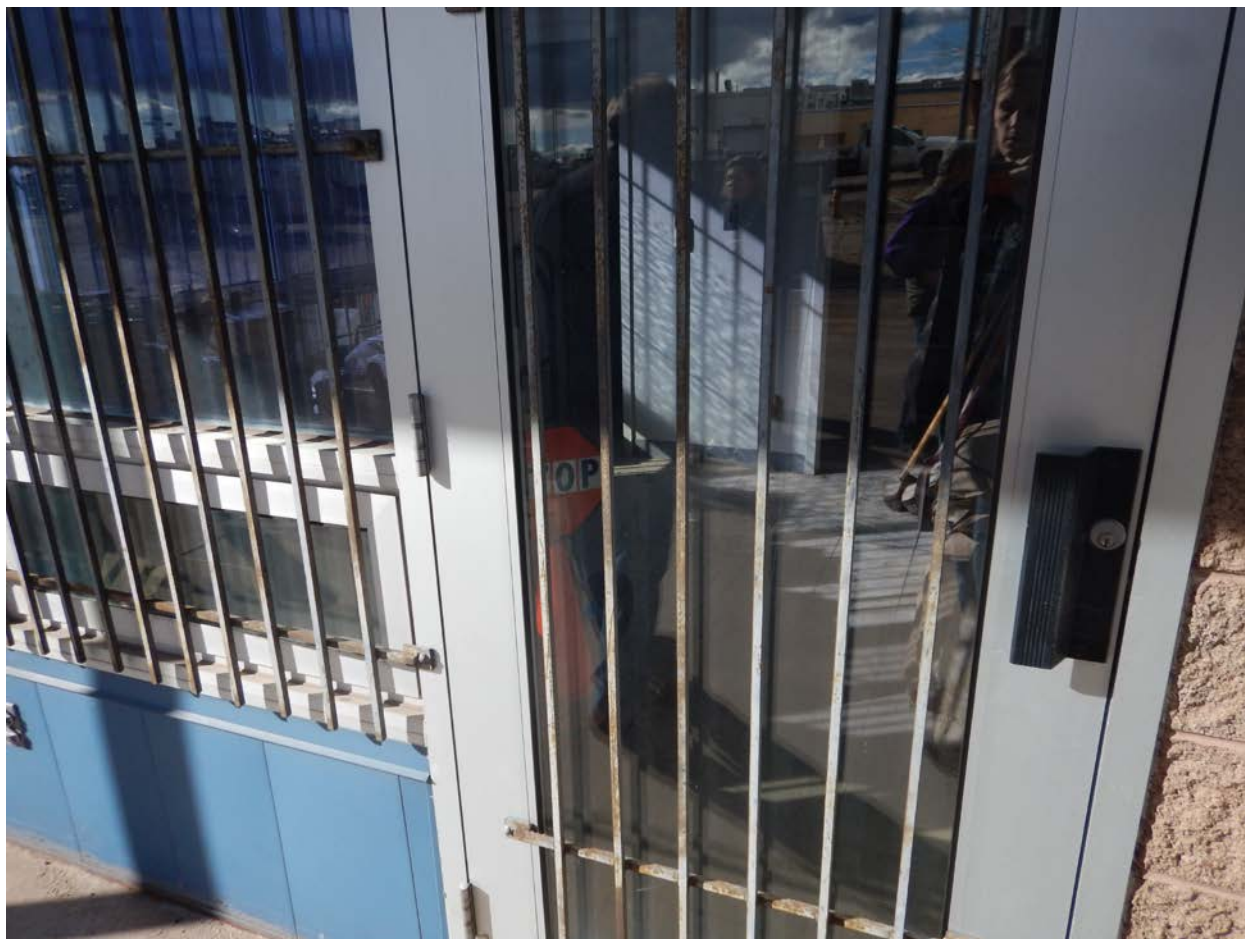


Photo File Name: DSCN0722

Date and Time of Photo: 12/9/2019, 1:19pm

Photographer: Stephanie Meyers

Description: Spill kit not easily accessible inside locked building



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: City of Santa Fe Service Center		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: DSCN0723

Date and Time of Photo: 12/9/2019, 1:20pm

Photographer: Stephanie Meyers

Description: Fueling station

Appendix 2

Sign-In Sheet



City of Santa Fe



EPA ASSESSMENT

DATE: December 9, 2019 TIME: 9 am LOCATION: Market Street

	NAME	ORGANIZATION	PHONE NO.	OTHER NO.	E-MAIL ADDRESS
1	DEE BEINGESSNER	CITY OF SF	505 855-6641		DEE BEINGESSNER@SANTAFENM.GOV
2	ALEX PUGLISI	CITY OF SANTA FE	505-955-4232		
3	Jennifer Foote	NMED	505 827 0596		jennifer.foote@state.nm.us
4	Carol Johnson	EPA	(214) 665-8471 214 404 8276		Johnson, Carol@epa.gov
5	Stephanie Meyers	EPA	214-665-6496		meyers.stephanie@epa.gov
6	DAVID ESPARZA	EPA	505-366-8402		esparza.Dav.1@epa.gov
7	Victor Lucero	City of Santa Fe	505-955-2117		vlucero@santafenm.gov
8	DAVE FIRE	City of SF	505-955-2134		dnpilke@SANTAFENM.GOV
9	Sam Burnett	Co SF	(955) 955 6853		jsburnett@Santafenm.gov
10					
11					
12					

Appendix 3

sMS4 Overview



United States Environmental Protection Agency
Dallas, Texas
sMS4 OVERVIEW

Section A: sMS4 Information

Name of sMS4 and Address:	City of Santa Fe 500 Market Street, Suite 200, Santa Fe, NM	Permit Number:	NMR040000
Pre-Assessment Date:	December 9, 2019		

Section B: Summary of the Interview

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

M	SWMP implemented	S	Illicit Discharge Detection and Elimination program
M	SWMP management trained	U	Municipal Good Housekeeping program
S	Construction Site Runoff program	S	Inspection schedule established for applicable Control Measures
S	Post-Construction Site Runoff program	S	Public Education, Outreach and Participation
S	Enforcement Actions	M	Data Management
N	Inspection of Industrial facilities	S	Structural Controls/Green Infrastructures/Pollutant Reduction Projects

Section C: Summary of the sMS4 Inspection

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

U	Permit	S	Records/Reports/Inventory
M	SWPPP, SOP, Management Guidelines or Good Housekeeping Manual in place	M	Trained Staff (emergency spill response, storm water)
M	Spill Kit	M	Scheduled facility inspection and clean up
S	Fueling Station	M	Trash bins and disposal areas
U	Equipment and Vehicle Wash area	U	Outfalls
M	Storage Bins	U	Training programs
M	Vehicle Maintenance area	U	General Good Housekeeping

Section D: Summary of the Inspection Observation

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

S	Uses an Inspection form or Checklist	S	Checks inspection reports for completion: date, signature
S	Takes appropriate and timely enforcement action	S	Notifies operator about areas of concern
S	Determines that a SWPPP is on site	M	Files the completed inspection report in a database
S	Determines NOI submitted or Permit on site	S	Follows-up with the operator if corrective action/s required
S	Checks for storm water discharges	S	Checks frequency of inspections
S	Checks storm water conveyances for protective covers		