NEW MEXICO
ENVIRONMENT DEPARTMENT

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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

March 30, 2016

Dr. Susan Davis-Wilkinson
Jemez Valley Public Schools
8501 Highway 4
Jemez Pueblo, NM 87024

RE: Minor Municipal, SIC 4952, NPDES Compliance Evaluation Inspection, Jemez Valley Springs Schools, NM0028479, March 17, 2016

Dear Dr. Davis-Wilkinson:

Enclosed please find a copy of the report and check list 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.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

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

If you have any questions about this inspection report, please contact Sandra Gabaldon at (505) 827-1041 or at sandra.gabaldon@state.nm.us.

Sincerely,

/s/ Bruce J. Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson (6EN-WC) by e-mail
NMED District I, Bill Chavez, Manager, by e-mail

Ms. Barbara Perry, Administrator
bperry@jvps.org

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	2	3	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
Transaction Code													
N	5	N	MN0028479			160317			C		S		1

MINOR PRIVATE DOMESTIC

Inspection Work Days	67–69	Facility Evaluation Rating	70	BI	71	QA	72		73–74	Reserved	75–80
			2		N		N				

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
Jemez Valley Public Schools – 851 Hwy 4, Jemez Pueblo, NM 87024 Interstate 25 South, Exit 242, West on 550 to State Road 4.	0950 Hours / 03-17-2016	November 1, 2013
	Exit Time/Date	Permit Expiration Date
	1305 Hours / 03-17-2016	October 31, 2018

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Louis Gachupin / Operator, Level I / (575) 834-7391 Barbara Perry / Administrator / (575) 834-3310	Lat : 34.3924 N Long: -10.4419 W
Name, Address of Responsible Official/Title/Phone and Fax Number Dr, Susan Davis – Wilkinson 8501 Highway 4 Jemez Pueblo, NM 87024 (575) 834-7391 / (575) 687-4219 (fax)	SIC: 4952
Contacted: Yes * No *	

Section C: Areas Evaluated During Inspection

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

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

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

Please see checklist and further explanations for details of findings

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sandra Gabaldon */s/ Sandra Gabaldon*	NMED/SWQB/(505) 827-1041/(505) 827-0160	March 30, 2016
Signature of Management QA Reviewer Jennifer Foote, Municipal Team Lead /s/ Jennifer Foote	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-0596 /(505) 827-0160	Date March 30, 2016

JEMEZ VALLEY PUBLIC SCHOOLS	PERMIT NO. NM0028479

SECTION A – PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED NO)*

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	☒ Y ☐ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	☒ Y ☐ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED	☒ Y ☐ N ☐ NA

SECTION B – RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☐ S ☐ M ☒ U ☐ NA (*FURTHER EXPLANATION ATTACHED YES)*
DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☒Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☐S ☐ M ☒ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☐ Y ☒ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☐ Y ☒ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☐ Y ☒ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☐ Y ☒ N ☐ NA
e) DATES AND TIMES OF ANALYSES.	☐ Y ☒ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☐ Y ☒ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☐ S ☐ M ☒ U ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	☐ S ☐ M ☒ U ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☒ Y ☐ N ☐ NA

SECTION C – OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED YES)*
DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	☒ S ☐ M ☐U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .	☐ S ☐ M ☒ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☐ S ☐ M ☒ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE	☒ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	☐ S ☒ M ☐U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	☐ Y ☒ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	☐ Y ☒ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	☐Y ☒ N ☐ NA

JEMEZ VALLEY PUBLIC SCHOOLS	PERMIT NO. NM0028479

SECTION C – OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	☐ Y ☐ N ☒ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ☐ N ☒ NA

SECTION D – SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	☐ Y ☐ N ☒ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	☒ Y ☐ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☐ Y ☐ N ☒ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☒ Y ☐ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☒ Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☐ Y ☐ N ☒ NA

SECTION E – FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED YES)*
DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE: V-notch weir	☒ Y ☐ N ☐ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☐ Y ☒ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE.	☐ Y ☒ N ☐ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☐ Y ☒ N ☐ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	☐ Y ☒ N ☐ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	☒ Y ☐ N ☐ NA
6. HEAD MEASURED AT PROPER LOCATION.	☒ Y ☐ N ☐ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED YES)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	☒ Y ☐ N ☐ NA

JEMEZ VALLEY PUBLIC SCHOOLS	PERMIT NO. NM0028479

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☐ S ☐ M ☒ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☐ S ☐ M ☒ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 0 % OF THE TIME. ☐ Y ☒ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. 0 % OF THE TIME. ☐ Y ☒ N ☐ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

LAB NAME Hall Environmental Department of Health, Scientific Laboratory Division

LAB ADDRESS 4901 Hawkins, NE; Albuquerque, NM 700 Camino de Salud; Albuquerque, NM

PARAMETERS PERFORMED BOD, TSS E.coli, Arsenic, Boron

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	None	Slight	None	None	Clear	

RECEIVING WATER OBSERVATIONS: Receiving water – Jemez Creek, appeared clear of any foam, grease, or oil sheen. It had a muddy color, which is normal in this area.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. Sludge is removed by a septic hauler 2x yearly. ☐ S ☐ M ☐ U ☒ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☒ N ☐ NA

2. TYPE OF SAMPLE OBTAINED

GRAB COMPOSITE SAMPLE METHOD FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☐ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☐ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☐ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☐ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☐ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☐ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☐ NA

Jemez Valley Public Schools
NPDES Permit NM0028479
Compliance Evaluation Inspection
Date of Inspection: March 17, 2016

INTRODUCTION:

A Compliance Evaluation Inspection (CEI) was conducted at the Jemez Valley Public Schools Wastewater Treatment Plant (WWTP) on March 17, 2016 by Sandra Gabaldón and Daniel Valenta, of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is classified as a minor discharger under the federal Clean Water Act (CWA), Section 402. This facility is regulated under the National Pollutant Discharge Elimination System (NPDES) permit program, and is assigned NPDES permit number NM0028497. The facility design flow is 0.03 million gallons per day (MGD).

The Jemez Valley Public Schools WWTP discharges into the Jemez River in Segment 20.6.4.107 of the Rio Grande Basin. This segment, as classified under the *Standards for Interstate and Intrastate Surface Water 20.6.4 NMAC*, has designated uses of: Irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat, primary contact, and public water supply on the Rio Grande.

The inspectors arrived at Jemez Valley Schools at approximately 0905 hours and conducted an entrance interview with Mr. Louis Gachupin, Level I Operator. The inspectors made introductions, presented Ms. Gabaldón's credentials, and discussed the purpose of the inspection with Mr. Gachupin. An exit interview to discuss preliminary findings of the inspection was conducted with Ms. Barbara Perry, Administrator, at the facility.

The NMED performs a specific number of CEI's annually for the United States Environmental Protection Agency (USEPA). The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with their NPDES permit. The enclosed inspection report is based on verbal information supplied by the permittee's representatives, observations made by the NMED inspector, and a review of records maintained by the permittee, commercial laboratories, and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative Further Explanations section of the report

TREATMENT SCHEME:

The Jemez Public Schools Wastewater Treatment Plant services only the schools. There is one lift station that brings influent to the treatment plant. This is a small activated sludge package plant. The WWTP has five chambers. Influent enters the first chamber where solids are separated out. The solids are sent to the second chamber for sludge thickening. Influent then flows to the third chamber for aeration and continues on to the fourth chamber. The system has two blowers, which are alternated in a cycle of six hours on, six hours off. Solids are pumped from the aeration basin back into the sludge thickening basin. The treated effluent enters the chlorination basin for disinfection. Chlorine is added at the beginning of the chamber via a

“dosing box” where tablets of sodium hypochlorite are fed. De-chlorination occurs after the chlorination basin via a dispenser of sodium sulfite tablets. The flow then enters a v-notch weir prior to discharging through a six inch pipe directly to the Jemez River.

SLUDGE MANAGEMENT:

Sludge is removed directly from the treatment plant on an as needed basis by a private septage hauler.

Jemez Valley Public Schools
NPDES Permit No. NM0028476
Compliance Evaluation Inspection
Date of Inspection: March 17, 2016

Further Explanations:

Note: The sections are arranged according to the format of the enclosed EPA inspection checklist (Form 3560-3), rather than being ranked in order of importance.

Section B – Recordkeeping & Reporting Evaluation – Overall Rating of "Unsatisfactory"

The permit requires in Part III.C.4 Records Contents:

Records of Monitoring Information shall include:

a. The date, exact place, and time of sampling or measurement;
b. The individual(s) who performed the sampling or measurements;
c. The date(s) and time(s) analyses were performed;
d. The individual(s) who performed the analyses;
e. The analytical techniques or methods used; and
f. The results of such analyses.

The permit requires in Part III.C.5 Monitoring Procedures:

a. Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.

c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

Findings for Recordkeeping and Reporting:

The WWTP does pH and total residual chlorine onsite. They send all other parameters (Biochemical Oxygen Demand, Total Suspended Solids, E. coli, Boron, and Arsenic) to contract laboratories. The facility has pH and total residual chlorine records that they keep in a calendar. The calendar does not provide a complete record of the required items in Part III.C.4 of the permit. The missing items include:

a. The exact place and time of sampling or measurement;
b. The individual(s) who performed the sampling or measurements;
c. The date(s) and time(s) analyses were performed;
d. The individual(s) who performed the analyses;
e. The analytical techniques or methods used.

The permittee provided no records of pH calibration. The permittee is required to calibrate their pH meter to bracket the expected pH. For example, the pH at the Jemez Valley Public Schools is approximately 7.6 S.U. The bracketed pH would be between the 7and 10 buffers. The operator would calibrate their pH meter for 7 and 10 and check with a buffer of 4. The pH meter the facility is using is an Oakton pH Testr 30. It states in their instruction manual that the pH calibration should be done at least weekly. (Instructions attached as Attachment 1).

The permittee is doing their effluent loading calculations correctly (concentration X 8.34 X flow). There is a problem in how the operator is using their flow calculation, however. The operator takes a measuring stick and measures the flow over the V-notch weir. It is not so much an issue that he is reading it this way, the issue lies in the fact that he was told and is unsure where the numbers are coming from to convert the inches over the weir into flow in million gallons per day. The operator should be using the discharge (head vs. flow rate) equation for free flowing V-notch weirs:

$Q = K H^{2.5}$

Where: Q = flow rate
H = head on the weir
K = constant, dependent on the angle of the notch and units of measure.

K constant for a 30° V-notch = 0.4359 (MGD)
K constant for 45° V-notch = 0.6689 (MGD)
K constant for a 60° V-notch = 0.9326 (MGD)
K constant for a 90° V-notch = 1.616 (MGD)

It appears that the V-notch weir at this facility may be a 90° degree V-notch weir. The operator must verify this by measuring the angle of the V-notch. Attached is a picture of a triangular V-notch weir and where the angle should be measured. Also attached are the 90° discharge tables for easy conversion of flow.

Because of the issues with the measurement of flow, it is unclear if the permittee is using the correct effluent daily flow as required for the loading calculation. The flow reading is imperative to provide the facility with the exact loading measures that are reported on their Discharge Monitoring Reports (DMRs).

The permittee is not sending DMR reports or their WET testing results to The U.S. Fish and Wildlife Service, Pueblo of Jemez, Pueblo of Zia and Pueblo of Santa Ana as required in Part II, Section F. The permittee is submitting their DMRs electronically at this time; however, this does not absolve their requirement to send their DMRs to the above entities.

Section C – Operations and Maintenance – Overall Rating of "Unsatisfactory"

The permit requires in Part III.B.3 Proper Operation and Maintenance:

a. *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and Related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also include adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

b. *The permittee shall provide adequate staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.*

Findings for Operation and Maintenance:

The permittee does not have standby power or other equivalent equipment onsite for any electrical outages that may occur.

The permittee does not have an alarm system for any issues that may occur at the treatment plant that may require immediate attention.

Mr. Gachupin is the operator onsite. He stated that there is another Wastewater Level I certified operator available when needed. However, Mr. Gachupin is not certified as a Wastewater Laboratory Tech I as required by NMAC 20.7.4 which states: "In order to perform wastewater analysis for regulatory compliance at public wastewater facilities after January 1, 2011, the indicated level of certification shall be required." Mr. Gachupin should be certified to do the pH and TRC onsite.

The permittee lacks documentation of their operation and maintenance manuals (O & M), standard operating procedures (SOPs) or any procedures for emergency treatment control as required by the permit.

Section E – Flow Measurement – Overall Rating of "Unsatisfactory"

The permit requires in Part III.C.6 Flow Measurements:

> *Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of devices. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.*

Findings for Flow Measurement:

Please see Section B. Recordkeeping and Reporting for at length discussion of flow measurement at this facility.

No calibration records are available for the flow measurement device. It is unknown if the procedures in place for measurement meet the 10% from true discharge rates throughout the range of expected discharges.

Section F – Laboratory – Overall Rating of "Unsatisfactory"

The permit requires in Part III.B.3 Proper Operation and Maintenance:

> *a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and Related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit.* ***Proper operation and maintenance also include adequate laboratory controls and appropriate quality assurance procedures****. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

Findings for Laboratory:

The permittee is required to maintain an adequate laboratory quality control / quality assurance program. The permittee does not do duplicate samples of any of their parameters. The

permittee should do at least duplicate samples 10% of the time. This would include one extra sample per year for samples required at a frequency of once per month.

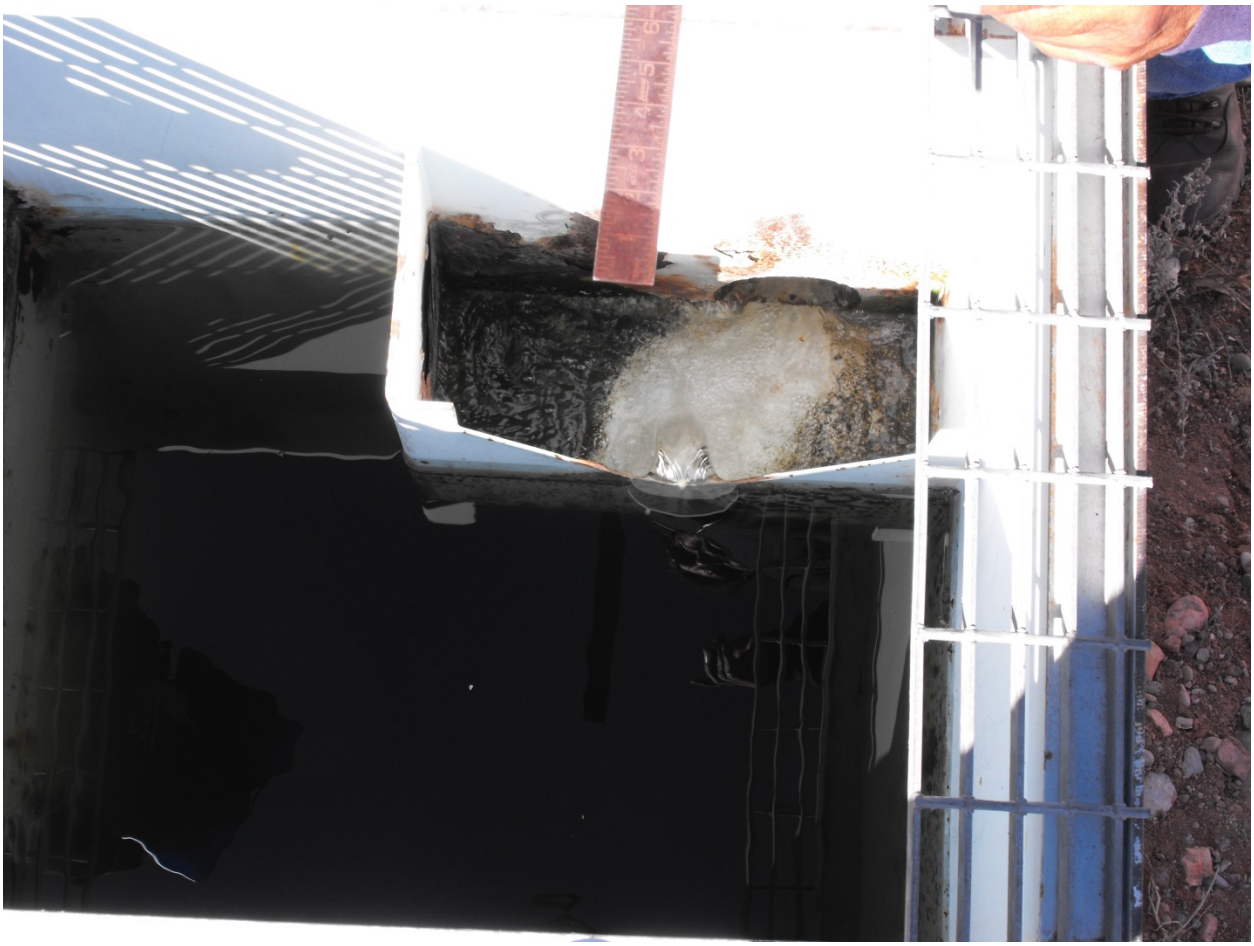
There are no calibration records for their pH analyses. pH calibration is suggested at least once per week for the Oakton pH testr 30.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Daniel Valenta	Date: March 17, 2016	Time: 1015 Hours
City/County: Jemez Springs / Sandoval		State: New Mexico
Location: Jemez Valley Schools Wastewater Treatment Plant		
Subject: Overview of plant.		

NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Daniel Valenta	Date: March 17, 2016	Time: 1056 Hours
City/County: Jemez Springs / Sandoval		State: New Mexico
Location: Jemez Valley Schools Wastewater Treatment Plant		
Subject: Effluent flow measurement at V-notch weir.		



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Daniel Valenta	Date: March 17, 2016	Time: 1035 Hours
City/County: Jemez Springs / Sandoval		State: New Mexico
Location: Jemez Valley Schools Wastewater Treatment Plant		
Subject: Discharge into Jemez River.		

NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Daniel Valenta	Date: March 17, 2016	Time: 1036 Hours
City/County: Jemez Springs / Sandoval		State: New Mexico
Location: Jemez Valley Schools Wastewater Treatment Plant		
Subject: Jemez River.