



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail – Return Receipt Requested

June 13, 2016

Dr. Colleen W. Bowman, Interim Superintendent
Central Consolidated School District
P.O. Box 1199
Shiprock, New Mexico 87420

**Re: Central Consolidated School District, Wastewater Treatment Plant, Minor Non-Municipal;
SIC 4952; NPDES Compliance Evaluation Inspection; NM0029319; May 19, 2016**

Dear Dr. Bowman:

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.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the “Further Explanations” section of the inspection report.

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 Erin Trujillo at 505-827-0418 or at erin.trujillo@state.nm.us.

Dr. Bowman, Central Consolidated School District, NM0029319

June 13, 2016

Page 2 of 2

Sincerely,

/s/Bruce J. Yurdin

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

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
Robert Italiano, NMED District II by e-mail
Sharon Ray, Secretary for Superintendent/Board, Central Consolidated School District by e-mail
Dennis Fieldstead, Director of Construction, Central Consolidated School District by 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	0	0	2	9	3	1	9	11	12	1	6	0	5	1	9	17	18	C	19	S	20	2
Remarks																												
S C H O O L W A S T E W A T E R T R E A T M E N T																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----												
67						70						71		72		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)		Entry Time /Date	Permit Effective Date
Central Consolidated School District No. 22, Kirtland High School and Middle School and associated facilities, 538 CR 6100, Kirtland, New Mexico. San Juan County.		~1155 hours / 05/19/2016	08/01/2012
		Exit Time/Date	Permit Expiration Date
		~1245 hours / 05/19/2016	07/31/2017
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)			Other Facility Data
-Dennis Fieldstead, Director of Construction / Central Consolidated School District / 505-368-4984 Ext # 20162, cell 505-793-6407 -Michael Moss / Plumber / Central Consolidated School District			Outfall Latitude: 36.731389° Longitude: -108.368611°
Name, Address of Responsible Official/Title/Phone and Fax Number			SIC 4952 Sewerage Systems
Dr. Colleen W. Bowman, Interim Superintendent / Central Consolidated School District / P.O. Box 1199, Shiprock, New Mexico 87420 / 505-368-4984			SIC 8211 Elementary and Secondary Schools
<p style="text-align: center;">Contacted</p> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			

Section C: Areas Evaluated During Inspection

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

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

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

1. See attached further explanations.

Name(s) and Signature(s) of Inspector(s) Erin S. Trujillo /s/Erin S. Trujillo	Agency/Office/Telephone/Fax NMED/SWQB/505-827-0418	Date 06/13/2016
Signature of Management QA Reviewer Sarah Holcomb /s/Sarah Holcomb	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798	Date 06/13/2016

Central Consolidated School District No. 22 / Kirtland Schools
Compliance Evaluation Inspection
NPDES Permit No. NM0029319
May 19, 2016

Further Explanations

Introduction

On May 19, 2016, a Compliance Evaluation Inspection (CEI) was conducted by Erin S. Trujillo of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) at the Central Consolidated School District No. 22 (CCSD), Kirtland High School, Kirtland Middle School and associated facilities at 538 CR 6100, Kirtland, New Mexico in San Juan County. CCSD is classified as a minor facility discharger under the federal Clean Water Act, Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned NPDES Permit No. NM0029319. The permit authorizes discharges of treated domestic wastewater to the San Juan River in Segment 20.6.4.401 New Mexico Administrative Code (NMAC) Standards for Interstate and Intrastate Surface Waters of the San Juan River Basin.

NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA) each year. The purpose of this inspection is to provide USEPA with information to evaluate the permittee's compliance with the NPDES permit. This report is based on review of files maintained by the permittee and NMED, on-site observation by NMED personnel, and information provided by the permittee's representatives.

Upon arrival of the announced inspection at approximately 1155 hours on May 19, 2016, Ms. Trujillo, made introductions, presented credentials and explained the purpose of the inspection to Mr. Dennis Fieldstead, Director of Construction, CCSD. Ms. Trujillo, Mr. Fieldstead and Mr. Michael Moss, Plumber, CCSD toured the lift station area at the Kirtland schools and associated facilities. After an on-site exit interview, the inspector left the facility at approximately 1240 hours on the day of the inspection. Additional requested information on the demolition and capping of the outfall line was provided by Mr. Robert (Bob) Echols, Cheney-Walters-Echols, Inc., Farmington, New Mexico, 505-327-3303 on June 3, 2016. Additional information was provided by phone by Mr. Fieldstead to Ms. Trujillo on June 9, 2016.

Treatment Scheme and Lift Station Area

At Kirtland, CCSD operated a domestic wastewater treatment plant (WWTP) with a design flow of 0.05 million gallons per day (MGD). The CCSD Kirtland schools and associated facilities domestic wastewater collection system was connected to Valley Water & Sanitation District (VWSD), Kirtland, New Mexico on September 6, 2012. Waste water is now treated at the City of Farmington WWTP (NPDES Permit No. NM0020583). The CCSD WWTP was demolished and decommissioned; and the outfall pipe was capped. See Attachment A of this report for details.

CCSD continues to own and operate a domestic sewage lift station that was modified when connected to the VWSD force main. Overflows at the lift station had been reported in the past. The modified lift station has a light alarm and a diesel generator for back up power. Bioxide Plus 71 (odor control) chemical storage tank and feed at the lift station feed is maintained by VWSD according to the on-site Permittee representatives. A storm water drop inlet is in the lift station area. The inlet is connected to a pipe with an outlet south of CR 6100 according to the on-site Permittee Representatives. Flow (stormwater, groundwater infiltration and/or other possible irrigation sources) continues from the pipe outlet to a pond in a residential area south of the Kirtland schools and facilities.

Permit Verification – Overall Rating of “Satisfactory”

Comment

To terminate an NPDES Permit, the Permittee may submit a request in writing to USEPA Region 6 with copy to NMED SWQB. It is recommended that applications, termination letters, reports, and other information be submitted using mail tracking and delivery confirmation.

Recordkeeping and Reporting Evaluation and Self-Monitoring – Both Overall rating of “Unsatisfactory”

Permit Requirements

Part I.A.1 (Effluent Limitations and Monitoring Requirements) of the Permit states “...During the period beginning on the effective date of this permit and lasting through the expiration date of this permit...the permittee is authorized to discharge treated municipal wastewater to San Juan River, in Segment Number 20.6.4.401, from outfall number 001. Such discharges shall be limited and monitored....” The following are excerpts from Part I.A.1 of the Permit:

Permit No. NM0029319			Page 3 of Part I		
PART I					
SECTION A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS.					
1. Effluent limits – 0.05 MGD design flow – OUTFALL 001					
During the period beginning on the effective date of this permit and lasting through the expiration date of this permit (unless otherwise noted), the permittee is authorized to discharge treated municipal wastewater to San Juan River, in Segment Number 20.6.4.401, from outfall number 001. Such discharges shall be limited and monitored by the permittee as specified below:					
EFFLUENT CHARACTERISTICS POLLUTANT	DISCHARGE LIMITATIONS Standard Units			MONITORING REQUIREMENTS	
	MINIMUM	MAXIMUM		MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	6.6	9		Five/Week	Instantaneous Grab

EFFLUENT CHARACTERISTICS POLLUTANT	DISCHARGE LIMITATIONS						MONITORING REQUIREMENTS	
	lbs/day, unless noted			mg/l, unless noted			MEASUREMENT FREQUENCY	SAMPLE TYPE
	30-DAY AVG	DAILY MAX	7-DAY AVG	30-DAY AVG	DAILY MAX	7-DAY AVG		
Flow MGD	Report	Report	Report	***	***	***	Daily	Instantaneous
Biochemical Oxygen Demand, 5-day	12.5	N/A	18.8	30	N/A	45	Once/Month	Grab
Biochemical Oxygen Demand, 5-day % removal, minimum	≥ 85% (1)	---	---	---	---	---	Once/Month	Calculation (1)
Total Suspended Solids	12.5	N/A	18.8	30	N/A	45	Once/Month	Grab
Total Suspended Solids % removal, minimum	≥ 85% (1)	---	---	---	---	---	Once/Month	Calculation (1)
E. Coli Bacteria	0.24 x 10 ⁹ (2)	N/A	N/A	126 (3)	235 (3)	N/A	Once/Month	Grab
Total Residual Chlorine	N/A	N/A	N/A	N/A	19 ug/l (4)	N/A	Once/3-Months (4)	Instantaneous Grab (4)
Total Dissolved Solids (*5, 6)	Report	N/A	N/A	Report	N/A	N/A	Once/3-Months	Grab
Total Dissolved Solids (*5, 7)	Report	N/A	N/A	Report	N/A	N/A	Once/3-Months	Grab

Part I.C.1 (Monitoring and Reporting) of the Permit states:

1. Monitoring and Reporting

- a. The permittee shall effectively monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the treated discharge.*
- b. Monitoring information shall be on Discharge Monitoring Report Form(s) EPA 3320-1 as specified in Part III.D.4 of this permit and shall be submitted quarterly. Each quarterly submittal shall include separate forms for each month of the reporting period.*
- c. Reporting periods shall end on the last day of the months March, June, September, and December.*
- d. The permittee is required to submit regular quarterly reports as described above postmarked no later than the 28th day of the month following each reporting period.*

e. NO DISCHARGE REPORTING

If there is no discharge at Outfall 001 during the sampling month, place an "X" in the NO DISCHARGE box located in the upper right corner of the Discharge Monitoring Report.

Part II.C.3 (Retention of Records) states:

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report, or application. This period may be extended by request of the Director at any time.

Part III.D.8 (Other Noncompliance) of the Permit states *"The permittee shall report all instances of noncompliance not reported under Parts III.D.4 and D.7 ...at the time monitoring reports are submitted. The reports shall contain the information listed at Part III.D.7."* Part III.D.7.a (...Reporting) states *"...The report shall contain the following information: (1) A description of the noncompliance and its cause; (2) The period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and, (3) Steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge."*

Per Part III.D.11 (Signatory Requirements), reports or information submitted to the Director shall be signed and certified. The following is the certification language:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Findings for Recordkeeping and Reporting and Self Monitoring

- Discharge Monitoring Reports (DMRs) were not submitted. This is a **Repeat Finding**.

Additional Notes: Permittee's subscriber agreement to submit electronic DMRs was approved April 19, 2011. A summary of DMR submittal information from USEPA Integrated Compliance Information System database indicates that USEPA did not receive the July 2012 monthly DMR, and did not receive monthly and quarterly DMRs, including "No Discharge" DMRs, as applicable, under the 2013 Permit thru the date of this CEI. Not submitting required DMRs to USEPA is a repeat finding of the August 2012 CEI available at:

<https://www.env.nm.gov/swqb/documents/swqbdocs/NPDES/Inspections/NM0029319-20120801.pdf>

- Monitoring measurements, results and calculations of possible discharge after July 2012 is not documented. Monitoring records after June 2012, if any, were either not kept, or were not readily available on the day of this CEI based on information from Mr. Fieldstead following this CEI.
- Non-compliance reports for not submitting DMRs were not submitted to USEPA with copy to NMED. Reports may also need to include periods of non-compliance with monitoring conditions of the permit as discussed above.

Additional Information: Permittee may contact USEPA Region 6 Enforcement and Compliance coordinator if there are questions on the DMR and non-compliance reporting requirements. Information in reports include, but is not limited to, exact dates of when discharged stopped, exact dates that monitoring occurred, information on retained records, certification and signatures. It is recommended that reports and information be submitted using mail tracking and delivery confirmation.

Facility Site Review – Overall Rating of “Marginal”

Permit Requirements

Part III.B.3.a (Proper Operation and Maintenance) of the Permits states:

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.

Part I.C.5 (Overflow Reporting) of the Permit states:

The permittee shall report all overflows with the Discharge Monitoring Report submittal. These reports shall be summarized and reported in a tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; observed environmental impacts from the overflow; action taken to address the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary).

Overflows which endanger health or the environment shall be orally reported to EPA at (214) 665-6595, and to the NMED Surface Water Quality Bureau at (505) 827-0187 within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows which endanger health or the environment shall be provided within five (5) days of the time the permittee becomes aware of the circumstance. The written reports shall be sent to both EPA, and the NMED Surface Water Quality Bureau.

Findings for Facility Site Review

- Dried sewage was observed on the ground in the lift station area. This is a **Repeat Finding**.

Additional Notes: The 2012 CEI report states “Numerous overflows from the lift station in front of the junior high school have occurred. These failures have resulted in raw sewage flowing across the road, into a storm drain, to a holding pond, past houses and a residential area and potentially to the San Juan River. No preventive measures have been taken to stop future overflows. Debris on the ground near the lift station shows dried sewage solids.” Based on the amount observed during this CEI and information from the on-site Permittee representatives, the sewage appeared to be from a spill during work to remove air from the system and not from a back up, high level or electrical outage causing an overflow at the lift station.

- No control measures were observed in the lift station area to prevent or minimize potential pollutants from chemical storage spills, raw sewage spills, or overflows from entering the storm water drop inlet and off-site surface waters.

Additional Information: Examples for control measures may include, but are not limited to, constructed or temporary inlet berms, wattles, spill kits, etc.). Also, written standard operating procedures should include updated contacts and procedures for spill or overflow clean up, notifications and reporting (e.g., VWSD, local residents, irrigation districts, state and/or federal agencies).

**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Erin S. Trujillo	Date: 05/19/2016	Time: 1211 hours
City/County: Kirtland / San Juan County	State: New Mexico	
Location: Central Consolidated School District / Kirtland Schools, Lift Station Area		
Subject: Diesel generator and Bioxide Plus 71 above-ground storage tank in school's lift station area.		



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Erin S. Trujillo	Date: 05/19/2016	Time: 1212 hours
City/County: Kirtland / San Juan County	State: New Mexico	
Location: Central Consolidated School District / Kirtland Schools, Lift Station Area		
Subject: Arrows point to examples of light gray dried raw sewage on ground and on vegetation at lift station.		



NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Erin S. Trujillo	Date: 05/19/2016	Time: 1214 hours
City/County: Kirtland / San Juan County	State: New Mexico	
Location: Central Consolidated School District / Kirtland Schools, Lift Station Area		
Subject: Storm water drop inlet in lift station area.		



NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Erin S. Trujillo	Date: 05/19/2016	Time: 1236 hours
City/County: Kirtland / San Juan County	State: New Mexico	
Location: Central Consolidated School District / Kirtland Schools, South of CR 6100		
Subject: Drop inlet shown in previous photo is connected to a pipe with an outlet according to on-site permittee representatives. Photo is of water at outlet of pipe south of schools and associated facilities.		



NMED/SWQB
Official Photograph Log
Photo # 5

Photographer: Erin S. Trujillo	Date: 05/19/2016	Time: 1236 hours
City/County: Kirtland / San Juan County	State: New Mexico	
Location: Central Consolidated School District / Kirtland Schools, Lift Station Area		
Subject: Flow from previous photo continues to ditch and pond in residential area.		



Attachment

From: [Lisa Sisson](#) on behalf of robert@c-w-e.com
To: [Trujillo, Erin S. NMENV](#)
Cc: [Dennis Fieldsted](#)
Subject: NM0023319, Central Consolidated Schools
Date: Friday, June 03, 2016 1:48:24 PM
Attachments: [DRAWING.pdf](#)
[Attachments.pdf](#)

June 3, 2016

Erin Trujillo
NMED
Surface Water Quality Bureau
erin.trujillo@state.nm.us

Reference: NM0023319, Central Consolidated Schools

Dear Erin:

I am attaching the drawing which we used to demolish the existing Kirtland High School Waste Water Treatment Plant as well as capping of the outfall line. We are also enclosing correspondence between our office and Hannah Branning with EPA. We trust you will contact our office if additional information is required in this matter.

Very truly yours,
CHENEY ▲ WALTERS ▲ ECHOLS, INC.
Robert A. Echols, Jr., P.E.
Vice President
robert@c-w-e.com

RAE/ata 13104

attachments

xc: Dennis Fieldsted

13104

Robert Echols

From: <Branning.Hannah@epamail.epa.gov>
To: <robert@c-w-e.com>
Sent: Wednesday, February 06, 2013 10:24 AM
Subject: Central Consolidated School District Permit Termination
Bob,

Please send your termination letter and copy of the contract to the Valley Sewer and Sanitation District to my address below.

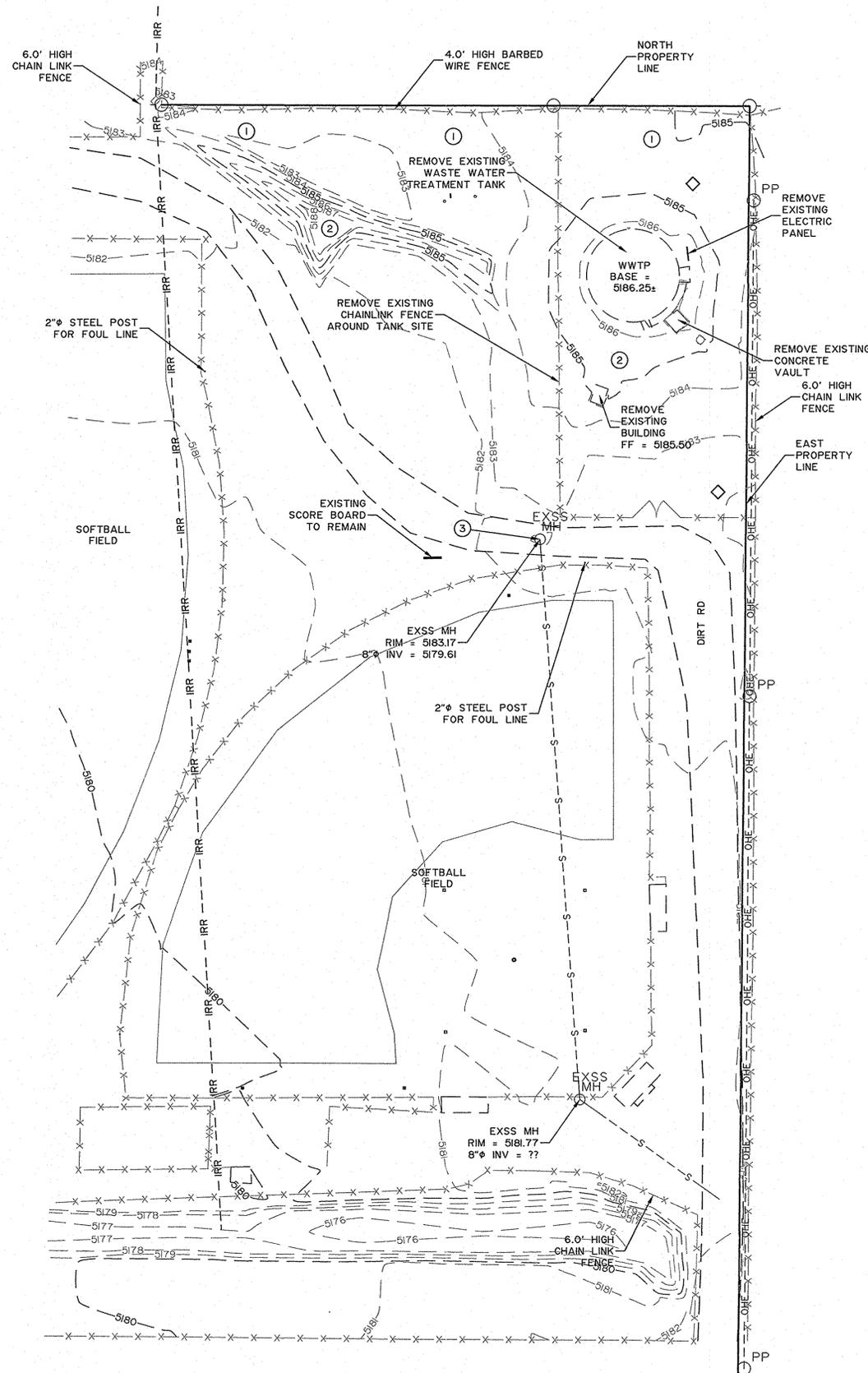
Please let me know if I can be of any assistance.

Thanks,

Hannah Branning, Environmental Scientist
New Mexico Coordinator
NPDES Compliance Section (6EN-WC)
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency Region 6
1445 Ross Ave. Ste 1200
Dallas, TX 75202-2733

Office: (214) 665-7489
Work Cell: (214) 557-3010
Fax: (214) 665-2168

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- DEMOLITION NOTES:**
- ① REMOVE ALL TREES, BUSHES AND VEGETATION IN AREA FROM NORTH PROPERTY LINE TO THE FENCE LINES AT THE SOFTBALL FIELDS AND EAST FROM THE SOFTBALL FIELDS FENCE LINES TO THE EAST PROPERTY LINE.
 - ② REGRADE AREA BACK TO ORIGINAL GRADE.
 - ③ CAP INLET PIPE AT MANHOLE - INSTALL CAP ON PIPE AND PLUG WITH CONCRETE.

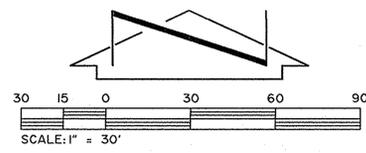
DATE	REVISION	BY

CHENEY WALTERS ECHOLS & ENGINEERS SURVEYORS
 909 W. APACHE • FARMINGTON, NEW MEXICO 87401 • (505)327-3303



DEMOLITION PLAN CENTRAL CONSOLIDATED SCHOOL KIRTLAND HIGH SCHOOL
 WASTE WATER TREATMENT PLANT
 KIRTLAND, NEW MEXICO

DATE: 04/02/2013
 DRAWN BY: HWS
 PROJ. 13104
 SCALE: 1" = 30'
 FILE: 13104SET
 SHEET
 1
 OF
 1



PRINTED: June 02, 2016
 FILE: \\wmyclouds4\public\TeraStation4\ARCHIVE\DWGS\DRAWINGS\DWG-

Valley

Water & Sanitation District

Chairman – Mark Duncan

PO Box 3015
4286 US Highway 64
Kirtland, NM 87417

February 11, 2013

Central Consolidated School District #22
PO Box 1199
Shiprock, NM 87420

RE: Kirtland, NM Schools

As of September 2012, all CCSD schools in Kirtland, NM are connected to and utilizing the Valley Water and Sanitation District's sewer system. Valley Water and Sanitation District is the only waste water system available for use in the Kirtland, NM area.

Thank you,

Jacque Foutz
Chairman