



**NEW MEXICO  
ENVIRONMENT DEPARTMENT**



***Surface Water Quality Bureau***

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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

**Certified Mail - Return Receipt Requested**

September 14, 2011

Mr. David Atencio  
Superintendent  
Jemez Valley Public Schools  
8501 Hwy 4  
Jemez Pueblo, NM 87024

Re: Minor Industrial SIC 4952, NPDES Compliance Evaluation Inspection, Jemez Valley Schools,  
NM0028479 Sandoval County, New Mexico May 26, 2011

Dear Mr. Atencio:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) 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, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate.

I wish to thank you for your cooperation and the cooperation of the Jemez Valley Schools representatives Barbara Perry and Louis Gachupin during this inspection.

If you have any questions about this inspection report, please contact me at (505) 827-0212.

Sincerely,  
/S/

Barbara Cooney  
Surface Water Quality Bureau

cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail  
Samuel Tate, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Diana McDonald, USEPA (6EN-WM) by e-mail  
Larry Giglio, USEPA (6WQ-PP) by e-mail  
Sonia Hall and Hannah Branning, USEPA (6EN-WC)  
NMED District II Manager 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 8 4 7 9 11 12 1 1 0 5 2 6 17 18 C 19 S 20 2					
Remarks					
M I N 0 R I N D U S T R I A L W W T P					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 1 69	70 3	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) Jemez Valley Public Schools / 8501 Highway 4/ Jemez Pueblo, NM 87024 Driving Directions: From Rio Rancho go North on HWY 550 –21.2 miles to State Road NM 4 Turn Right – go 8.5 miles through Jemez Pueblo to Canon. The School’s Administrative Offices are on the Left Side of the Road at the School	Entry Time /Date 12:35 / May 26, 2011	Permit Effective Date November 1, 2006
	Exit Time/Date 15:30 / May 26, 2011	Permit Expiration Date October 31, 2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Barbara Perry, Administrator (575) 834-7391 Louis Gachupin, Operator (575) 834-7391	Other Facility Data LAT 35° 39' 24"N LONG -106° 44' 19"W SIC 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. David Attencio (575) 834-7391 Jemez Valley Public Schools 8501 Highway 4 Jemez Pueblo, NM 87024	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

#### Section C: Areas Evaluated During Inspection

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

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

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

SEE FURTHER EXPLANATIONS SECTION OF THIS REPORT FOR DETAILS

Name(s) and Signature(s) of Inspector(s) Barbara Cooney /S/	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212 Fax 505-8270160	Date 9-14-2011
Signature of Management QA Reviewer Richard Powell /S/	Agency/Office/Phone and Fax Numbers 505- 827-2798	Date 9-15-2011

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS  S  M  U  NA (FURTHER EXPLANATION ATTACHED No )

DETAILS: The Current Superintendent is Mr. David Atencio.

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: Daily logs and sampling records are hand written on a monthly calendar. Some sample collection information is missing.

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 Sample location not clearly written.  Y  N  NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING Louis Gauchupin is the only person who collects samples but it is not written on the collection info  Y  N  NA

c) ANALYTICAL METHODS AND TECHNIQUES.  Y  N  NA  
Commercial Lab = Hall – Does not list edition of Standard Methods being used -18th, 19th & 20th Ed are approved

d) RESULTS OF ANALYSES AND CALIBRATIONS.  Y  N  NA

e) DATES AND TIMES OF ANALYSES. Date of sample collection are recorded but not time of analysis for pH & TRC  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  
Alarm is a flashing light that no one would see unless they are at the WWTP. Operator checks WWTP daily.

5. ALL NEEDED TREATMENT UNITS IN SERVICE.  S  M  U  NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. One trained and certified operator. There is no back up operator.  S  M  U  NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. Some parts are on site but most would have to be ordered for replacement.  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

## 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: Flow measurements are essentially an estimate. A hand held rule w/ a square weir box is the official method.

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  
 TYPE OF DEVICE  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. (DATE OF LAST CALIBRATION \_\_\_\_\_)  
 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

**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  
 Chlorine buffer is expired, pH calibrations not done in more than 6 months - should be done every time.

4. QUALITY CONTROL PROCEDURES ADEQUATE.  S  M  U  NA

5. DUPLICATE SAMPLES ARE ANALYZED. 10 % OF THE TIME. Commercial Lab Samples duplicated no duplicates for pH and TRC  Y  N  NA

6. SPIKED SAMPLES ARE ANALYZED. 10 % OF THE TIME.  Y  N  NA

7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Hall Environmental Lab  
 LAB ADDRESS 4901 Hawkins NE Suite D  
 Albuquerque, NM 87109  
 PARAMETERS PERFORMED BOD, TSS, E.coli

**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
01	None	None	None	None	None	Clear, slight green	NA

RECEIVING WATER OBSERVATIONS

**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.  S  M  U  NA

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

**SECTION I - SAMPLING INSPECTION PROCEDURES** (FURTHER EXPLANATION ATTACHED No.).

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  
May 26, 2011  
Page 1 of 5

### **Introduction**

On May 26, 2011 a Compliance Evaluation Inspection (CEI) was conducted at the Jemez Valley Public Schools Wastewater Treatment Plant (WWTP) located in Canon, New Mexico by Barbara Cooney of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB).

The inspection was conducted by NMED for the US Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. These inspections are conducted under contract with the USEPA and are used by EPA to evaluate compliance with the NPDES permit program. This inspection report is based on information supplied by the Jemez Valley Public School representatives (the permittee), observations made by the NMED inspector, reports and records kept by the permittee and/or NMED.

The Jemez Valley Public Schools Wastewater Treatment Plant is classified as a minor industrial discharge with a design flow of 0.03 MGD. The discharge for the WWTP enters the Jemez River in Water Quality Segment 20.6.4.107 NMAC, at Latitude 35.95573 North, Longitude -106.73868 West. The Designated Uses for this segment of the river are: Coldwater aquatic life, primary contact, irrigation, livestock watering and wildlife habitat.

### **Inspection Details**

The inspector arrived at the Jemez Valley Public Schools administrative office at 12:35 hours and met with Barbara Perry- Administrative Assistant To The Superintendent. An entrance interview was conducted with Ms. Perry. The inspector presented credentials and explained the purpose of the inspection. Mr. Louis Gachupin, WWTP Operator joined Ms. Cooney for the inspection of the WWTP. Directly following the inspection, Ms. Cooney met with Ms. Perry for a records review. An exit interview was held with Ms. Perry and Mr. David Atencio, Superintendent. The inspector left the site at 15:05 hours.

### **Treatment Scheme**

The collection system serves the schools and does not include any additional residences or businesses. The teacher housing units are on a septic system according to Barbara Perry. In the collection system there is one lift station. From other points in the collection system and from the lift station, wastewater flows via gravity to the activated sludge package plant. The WWTP has five chambers: the influent enters the first chamber where solids are separated out and sent to the second chamber for sludge thickening. The liquids flow to the third chamber then to the fourth chamber that serves as the two aeration basins. The aeration basins and the sludge thickener are feed by two blowers that alternate in a cycle of 6 hours on and 6 hours off, so each blower is rested for 14 hours a cycle. From the aeration basin, solids are pumped from the bottom of the chamber back to the sludge thickener. The liquids are decanted into the chlorine contact chamber for disinfection. Chlorine is added at the beginning of the chamber via a "dosing box" where tablets of Sodium Hypochlorite are fed. It is difficult to determine the detention time in the chlorine contact chamber. De-chlorination occurs past the chlorine contact chamber in the effluent line via a dispenser of Sodium Sulfite tablets. The flow continues approximately 30 feet to the Jemez River.

### **Sludge Handling**

Solids are wasted from the secondary clarifier to the digester on a six hour cycle. Solids from the digester are removed by Vactor truck and hauled to the Albuquerque 2nd Street Reclamation facility for final disposal. The scrapings from the influent bar screen are dried and disposed of at the Rio Rancho land fill.

### **Further Explanations**

Note: The sections are arranged according to the format of USEPA Form 3560-3 and checklist, attached, rather than being ranked in order of importance.

### **Permit Verification**

Overall Rating For Permit Verification (Satisfactory)

### **Record Keeping and Reporting**

Overall Rating For Record Keeping and Reporting (Marginal)

#### **Permit Requirements For Recordkeeping and Reporting**

The permit requires in Part III.C. RETENTION OF RECORDS:

*The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instruments, 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 data of the samples, measurement, report, or application. This period may be extended by request of the Director at any time.*

The permit requires in Part III.C.4. RECORDS CONTENT:

*Records of monitoring information shall include:*

- a. The date, exact place, and time of sampling or measurements;*
- 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 technique or methods used; and*
- f. The results of such analyses.*

#### **Findings For Record Keeping and Reporting**

1) Maintenance logs are kept on a calendar the operator carries with him. The logs were just brief notes on the day of the month. This is fine if there are back up maintenance orders and receipts, but they are not kept together.

2) Sampling records are kept by the operator on a calendar with some hand written info on the dates. Sampling and analysis logs do not list the approved method for Total Residual Chlorine (TRC), pH.

- 3) Sample and analysis records do not identify both the person who collected the samples and the person who analyzed the samples for TRC and pH.
- 4) Sampling and analysis records do not identify the time, and date the sample was collected and the time and date the sample was analyzed.

### **Operation and Maintenance**

Overall Rating For Operation and Maintenance (Marginal)

There has been an overall improvement in the Operations and Maintenance since the time of the last inspection. However there are some areas that still need attention.

#### **Permit Requirements For Operation and Maintenance (O&M)**

The permit requires in Part III.B.3. PROPER OPERATIONS AND MAINTENANCE:

*a. The permittee shall at all times properly operate and maintain all facilities and systems of the 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 includes 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 an adequate operation staff which is duly qualified to carry out the operation, maintenance and testing functions required to insure compliance with the conditions of this permit.*

#### **Findings for Operation and Maintenance**

- 1) The aeration basin looked somewhat grey instead of a rich brown color that indicates health bacterial growth necessary for biological treatment. This is a very small package plant and there may not be adequate "food" available to maintain the desired microbial growth. Solids had not been wasted from the digester portion of the plant since 2009 according to plant representatives.
- 2) There was moderate growth of algae on the side walls of the chlorine contact chamber at the time of the inspection. Mr. Gachupin stated that the chamber was scrubbed down every two weeks.
- 3) Solids are pumped and removed from the chlorine contact chamber once a month, though some floating solids and grease were observed in the chamber. There were no Standard Operating Procedures.
- 4) The Emergency Plan is to shut down the School in the event of a WWTP failure.
- 5) There is one plant operator, Mr. Louis Gachupin, who is certified as a Level 1 Wastewater Operator through the State of New Mexico Operators certification program. Mr. Gachupin is the person who is responsible for all maintenance and sampling of the WWTP. There is no back up person who is knowledgeable in the event Mr. Gachupin is not available.

- 6) There were a few spare parts on site but most parts would need to be ordered if necessary.
- 7) There is an inadequate alarm system in the event of WWTP overflows or power failures.

### **Self-Monitoring**

Overall Rating For Self Monitoring (Satisfactory)

### **Flow Measurement**

Overall Rating For Flow Measurement (Marginal)

#### **Permit Requirements For Flow Measurements:**

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 device. Devices selected shall be capable of measuring flow with a maximum deviation of less than 10% fro true discharge rates throughout the range of expected discharge volumes.*

#### **Findings For Flow Measurement**

The flow measurement device is a square weir box that measures approximately 12 inches by 7 inches deep. The measurements are taking with a hand held ruler. There was no conversion chart available. Mr. Gachupin said he knew the conversions by memory, although he did not know how the conversion is derived. The flow through the weir box was not a smooth uninterrupted laminar flow. There were definite ripples because the weir box is too small to provide the kind of flow necessary for accuracy.

Due to the design of the weir box, the lack of a fixed measuring device, the uneven flow, and no records of flow conversion factors, this device does not produce a reliable flow reading. The flow readings are estimates.

### **Laboratory**

Overall Rating For Laboratory (Marginal)

#### **Permit Requirements For Laboratory**

The permit requires in Part III. C. 5. MONITORING PROCEDURES

*a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 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.*

**Findings For Laboratory**

There has been an overall improvement in the Laboratory since the time of the last inspection, including the purchasing and use of updated equipment for monitoring of pH and TRC. However there are some areas that still need attention.

The laboratory analysis for E. coli, TSS, and BOD are conducted by the contract laboratory Hall Environmental. Two parameters are conducted by the operator in the field. These parameters are pH and Total Residual Chlorine (TRC).

- 1) There was no record that the TRC and pH analysis was conducted within the 15 minute holding time. However, Mr. Gauchupin demonstrated how he did the sampling for these procedures. He collects a sample and immediately runs the analysis on either the TRC or the pH. He then collects another sample for the remaining test. From his demonstration, the samples are being run within the 15 minute holding time but the collection time and the analysis times are not recorded.
- 2) The buffer for the TRC analysis was expired.
- 3) According to Mr. Gauchupin, the last time he calibrated the pH meter was more than 6 months earlier. The meter should be calibrated each time it is used.

**Effluent and Receiving Waters**

Overall Rating For Effluent and Receiving Water (Satisfactory)

**Sludge Handling and Disposal**

Overall Rating For Sludge Handling and Disposal (Satisfactory)