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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

JAMES H. DAVIS, Ph.D.
Director
Resource Protection Division

Certified Mail – Return Receipt Requested

November 8, 2012

Mr. Reyes Romero, Deputy State Fire Marshall
New Mexico Firefighters Training Academy
600 Aspen Road
P.O. Box 239
Socorro, New Mexico 87801

Re: Minor Non-Municipal, SIC 9224, NPDES Compliance Evaluation Inspection, New Mexico Firefighters Training Academy, NM0029726, November 7, 2012

Dear Mr. Romero,

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, 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 and NMED regarding modifications and compliance schedules.

My thanks for the help and cooperation of Mr. Joey Anaya during this inspection. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 222-9587.

Sincerely,
/s/ Sarah Holcomb
Sarah S. Holcomb
Surface Water Quality Bureau

CC: Carol Peters-Wagnon, USEPA (6EN-WM) by email
Rashida Bowlin, USEPA (6EN-AS) by email
Diana McDonald, USEPA (6EN-WM) by email
Larry Giglio, USEPA (6EN-P) by email
Bill Chavez, NMED District I Manager, by email
Hannah Branning, USEPA (6EN-AS), by email
Darlene Whitten-Hill, USEPA (6EN-AS), by email



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 0 0 2 9 7 2 6 11 12 1 2 1 1 0 7 17 18 C 19 S 20 2					
Remarks					
N M F I R E F I G H T E R S T R A I N I N G					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 4	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) NEW MEXICO FIREFIGHTERS TRAINING ACADEMY, 600 ASPEN ROAD, SOCORRO, NEW MEXICO: FROM I-25 IN SOCORRO TAKE EXIT 150. CONTINUE TO FOLLOW BUSINESS I-25 TO US-60 WEST. TURN RIGHT AT SPRING STREET. CONTINUE TO FOLLOW SPRING STREET AND TURN RIGHT AT ASPEN ROAD TO ACADEMY. SOCORRO COUNTY.	Entry Time /Date 0900 HOURS / 11-7-2012	Permit Effective Date 7-1-2009
	Exit Time/Date 1025 HOURS / 11-7-2012	Permit Expiration Date 6-30-2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. JOEY ANAYA, PLANT MANAGER (575) 835-7520	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. REYES ROMERO, DEPUTY STATE FIRE MARSHALL (575) 835-7506 600 ASPEN ROAD, PO BOX 239, SOCORRO, NM 87801	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	GPS: N. 34° 03.352" W. -106° 55.093" SIC: 9224

Section C: Areas Evaluated During Inspection

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

S	Permit	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	N	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	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 REPORT AND FURTHER EXPLANATIONS.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date 11-8-2012
Signature of Management QA Reviewer Richard Powell /s/ Richard Powell	Agency/Office/Phone and Fax Numbers 505-827-2798	Date 11-8-2012

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED NO)

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. DETAILS: No discharges since last inspection. S M U NA (FURTHER EXPLANATION ATTACHED YES)

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. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED YES)

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

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: Permittee has not discharged.

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 NO.)
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE Not required.
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Permit requires estimate. 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 NO.)
 DETAILS: No discharges since last inspection.

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

4. QUALITY CONTROL PROCEDURES ADEQUATE. S M U NA

5. DUPLICATE SAMPLES ARE ANALYZED. 100 % OF THE TIME. Y N NA

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

7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME Hall Environmental

LAB ADDRESS 4901 Hawkins NE, Albuquerque, NM 87109

PARAMETERS PERFORMED All except pH (if there is a discharge).

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED _).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	No Flow						
002	No Outfall/No Flow						

RECEIVING WATER OBSERVATIONS

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED YES).

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

**Compliance Evaluation Inspection
New Mexico Firefighters Training Academy
NPDES Permit #NM0029726, November 7, 2012**

Further Explanations

Introduction

On November 7, 2012, Sarah Holcomb and Bruce Yurdin of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the New Mexico Firefighters Training Academy at 600 Aspen Road in Socorro, Socorro County, New Mexico. The New Mexico Firefighters Training Academy is classified as a minor industrial discharger under the federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0029726 which regulates discharge of treated effluent from Outfall 001 and Outfall 002 to an unclassified dry arroyo, thence to a diversion channel and to the Rio Grande in segment 20.6.4.105 of the *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC)*.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with the NPDES permit. This inspection report is based on information provided by the permittee's on-site representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

An entrance interview was conducted with Mr. Joey Anaya, Plant Systems Manager, at approximately 0900 hours on November 7, 2012. The inspector made introductions, presented her credentials and discussed the purpose of the inspection.

Treatment Scheme

The New Mexico Firefighters Training Academy was created as a part of the State Fire Marshall's Office under the Public Regulation Commission, and opened in January 1989. The facility offers year round courses ranging from entry-level to advanced management for chief officers. In addition to hands-on fire suppression, courses are conducted in various technical rescue, auto extrication, hazardous materials, and arson investigation. Specialized burn props are used on concrete burn pads or in buildings within the asphalt paved areas of the facility.

The facility has four separate concrete pads. The pads are bermed and sloped toward an underground pipe system. A flammable liquid pad and liquid petroleum gas pad are currently used in firefighting scenarios. Diesel and "Micro-Blaze", a surfactant foaming agent, is used to set and extinguish training fires at the liquefied petroleum gas pad. Fire suppression is not conducted at the pseudo hazmat pad and fourth pad. The fourth pad is used for extrication exercises. A junkyard in Albuquerque supplies the vehicles for the exercise and recovers them after the academy has finished with them.

Diesel is used to light pallets on fire in the Burn Building. After extinguishing the fire, ash and cinders are flushed through cut drainage holes in the Burn Building to the paved areas. The paved area is sloped to drain toward a gate above the underground pipe system. This grate would also receive storm water runoff.

The pipe system leads to a foam separator and an oil and water separator before continuing to two lined and aerated lagoons (primary and secondary lagoon). The capacity of the primary and secondary lagoons is 0.5 million gallons and 1 million gallons, respectively, according to the permittee's on-site representative. The primary or north lagoon receives wastewater created from the firefighting activities and contains three aerators. The secondary or south lagoon receives gravity overflow from the primary lagoon, potable water from hose training exercises, make-up potable water and occasionally pumpage from the primary lagoon when it is drained and cleaned. This pond contains four aerators. Potable water is supplied from the City of Socorro.

Sediments in the water are allowed to settle in the lagoons before the water is pumped from the secondary lagoon and reused in training exercises. Wastewater in the secondary lagoon has also been land applied to on-site fields. The permittee has applied for and received a NMED Ground Water Quality Bureau Discharge Permit (DP-510) for additional discharges to on-site fields.

A concrete outfall structure for Outfall 001 is located on the northeast side of the primary lagoon. No discharges into the receiving stream have been reported to have occurred from Outfall 001. The NPDES permit authorizes discharges from Outfall 002 from the secondary lagoon, but no outfall structure has been installed. No discharges into the receiving stream have been reported to have occurred from the secondary lagoon.

Solids Removal

The facility has applied for a temporary discharge permit with the NMED Ground Water Quality Bureau when it comes time for solids removal from the ponds. The wastewater from the ponds is applied to the ground during this process, and the solids are removed from the bottom of the pond, put into barrels and hauled offsite to a landfill by Advanced Environmental Solutions, Inc out of Belen, NM. The facility usually conducts this activity during June of each year, but is looking to change their timeframe to February or March to reduce the water strain on the City of Socorro.

Further Explanations

Section B – Recordkeeping and Reporting Evaluation – Overall Rating of Satisfactory

The permit requires in Part III.D.4:

Monitoring results must be reported on Discharge Monitoring Report (DMR) Form EPA 3320-1 in accordance with the General Instructions on the form...

Findings for Recordkeeping and Reporting:

The permittee is not required to monitor their discharge except for when they are discharging, and there has not been a discharge from the facility in quite some time. However, the permittee has made the switch to EPA's NetDMR reporting system and indicated during the inspection that this tool has made their reporting load more manageable.

Section C – Operations and Maintenance Evaluation – Overall Rating of Satisfactory

The permit requires in Part III.B.3.b:

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

Findings for Operations and Maintenance:

The permittee currently does an excellent job of running and maintaining the facility. The staff are certified wastewater operators from the time the sanitary waste was treated onsite – the facility has since hooked into the City's sanitary sewer system. Two of the three maintenance staff are certified as small wastewater operators. However, during discussions with the permittee's representative during the course of the inspection, it was apparent that the staff sometimes have a difficult time keeping up with all the required duties. It is recommended that the facility consider hiring an additional maintenance staff person to cover duties and ensure that all equipment is maintained in working order.

NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Sarah Holcomb	Date: 11-7-2012	Time: 0938 hours
City/County: Socorro/Socorro County		
Location: NM Firefighters Training Academy, 600 Aspen Rd., Socorro, NM		
Subject: Primary lagoon which receives wastewater from the firefighting activities. View is from one of the burn pads, showing the concrete ditch conveying water from the pad to the lagoon.		



NMED/SWQB

Official Photograph Log

Photo # 2

Photographer: Sarah Holcomb	Date: 11-7-2012	Time: 0945 hours
City/County: Socorro/Socorro County		
Location: NM Firefighters Training Academy, 600 Aspen Rd., Socorro, NM		
Subject: ARFF (Aircraft Rescue and Fire Fighting) burn certification conducted on the day of this inspection. Diesel is used as the accelerant and the firefighters were using water (not foam) to put out the fire. The drain is located at the back (right side) of the burn pad.		

