SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARTIN
Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 23, 2011

Mr. Bill Nickell, Adminstrator
Paa-Ko Communities Sewer Association
45 Storyteller Court
Sandia Park, NM 87047

Re: Minor Industrial, SIC 4952, NPDES Compliance Evaluation Inspection, Paa-Ko Wastewater Treatment Plant, NM0030724, May 18, 2011

Dear Mr. Nickell,

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 to modify your operational and/or administrative procedures, as appropriate.

I wish to thank you for the cooperation extended to the NMED personnel by Mike Butler while at the Paa-Ko Wastewater Treatment Plant. If you have any questions about this inspection report, please contact me at (505) 222-9587 or sarah.holcomb@state.nm.us.

Sincerely,
/s/ Sarah Holcomb
Sarah Holcomb
Environmental Scientist/Specialist
NMED Surface Water Quality Bureau

Cc: Marcia Adams, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Samuel Tates, USEPA (6EN-AS) by e-mail
Larry Giglio, USEPA (6EN-P) by e-mail
Jennifer Ickes, NMED District 1 Manager (by e-mail)
Cynthia Arnold, New Mexico American Water, P.O. Box 370, Edgewood, NM 87015

EPA

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

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	yr/mo/day	17	Inspec. Type	18	Inspector	19	Fac Type	20
	N	5	NM0003072	12	110518		C		S		2	

Remarks: MINOR INDUSTRIAL

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
			3			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)*
PAA-KO WASTEWATER TREATMENT PLANT, BERNALILLO COUNTY: FROM ALBUQUERQUE, HEAD WEST ON I-40. TAKE THE CEDAR CREST EXIT TO HIGHWAY 14. FOLLOW HWY 14 TO SANDIA PARK. TAKE FIRST ENTRANCE TO PAA-KO ON PAA-KO DRIVE. PLANT ENTRANCE IS AT THE INTERSECTION OF PAA-KO DR AND KIVA. GATE IS LOCATED ON THE RIGHT.

Entry Time /Date
0830 hours / 5-18-2011

Permit Effective Date
5-1-2007

Exit Time/Date
1015 hours / 5-18-2011

Permit Expiration Date
4-30-2012

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
MR. MIKE BUTLER, FIELD SUPERVISOR, NEW MEXICO AMERICAN WATER (505) 281-3294

Other Facility Data

GPS:
N. 35° 11' 43.43"
W. -106° 18' 57.59"

SIC: 4952

Name, Address of Responsible Official/Title/Phone and Fax Number
MR. BILL NICKELL, ADMINSTRATOR
45 STORYTELLER COURT, SANDIA PARK, NM 87047 (505) 286-5775

Contacted
Yes [ ] No [*]

Section C: Areas Evaluated During Inspection

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

M	Permit	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	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. **INSPECTOR ARRIVED AT THE FACILITY AT 0830 HOURS ON MAY 18, 2011. THE INSPECTOR CONDUCTED AN ENTRANCE INTERVIEW WITH MR. MIKE BUTLER, FIELD SUPERVISOR FOR NEW MEXICO AMERICAN WATER, WHERE SHE PRESENTED CREDENTIALS AND DISCUSSED THE PURPOSE OF THE INSPECTION.**
2. **PLEASE SEE REPORT FOR FURTHER EXPLANATIONS.**
3. **AN EXIT INTERVIEW TO DISCUSS THE PRELIMINARY FINDINGS OF THE INSPECTION WAS CONDUCTED WITH MR. BUTLER ON MAY 18, 2011 AT THE FACILITY.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sarah Holcomb ***/s/ Sarah Holcomb***	**NMED/SWQB 505-222-9587**	**4-24-2011**

Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
Richard Powell ***/s/ Richard Powell***	**NMED/SWQB 505-827-2798**	**4-24-2011**

EPA Form 3560-3 (Rev. 9-94) Previous editions are obsolete.

PAA-KO WASTEWATER TREATMENT PLANT	PERMIT NO. NM0030724

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS O S X M ¨ U ¨ NA (*FURTHER EXPLANATION ATTACHED YES*)
DETAILS:

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

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. X S ¨ M ¨ U ¨ NA (*FURTHER EXPLANATION ATTACHED NO*)
DETAILS:

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

SECTION C - OPERATIONS AND MAINTENANCE

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

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

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	O Y X N ¨ NA

PAA-KO WASTEWATER TREATMENT PLANT	PERMIT NO. NM0030724

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

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

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. X S ¨ M ¨ U ¨ NA *(FURTHER EXPLANATION ATTACHED no).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	X Y ¨ N ¨ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	X Y ¨ N ¨ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	X Y ¨ N ¨ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	X Y ¨ N ¨ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	X Y ¨ N ¨ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	X Y ¨ N ¨ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	X Y ¨ N ¨ NA
b) PROPER PRESERVATION TECHNIQUES USED.	X Y ¨ N ¨ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	X 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?	O Y ¨ N X NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. X S ¨ M ¨ U ¨ NA *(FURTHER EXPLANATION ATTACHED NO)*
DETAILS:

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

SECTION F – LABORATORY

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

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

PAA-KO WASTEWATER TREATMENT PLANT | PERMIT NO. NM0030724

SECTION F - LABORATORY (CONT'D)

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

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. X S O M ¨ U ¨ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. X S ¨ M ¨ U ¨ NA

5. DUPLICATE SAMPLES ARE ANALYZED. __ % OF THE TIME. O Y ¨ N X NA

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

7. COMMERCIAL LABORATORY USED. X Y ¨ N ¨ NA

LAB NAME HALL ENVIRONMENTAL

LAB ADDRESS 4901 HAWKINS ST NE, ALBUQUERQUE, NM 87109

PARAMETERS PERFORMED BOD, TSS, E.COLI

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

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	N/A	N/A	N/A	N/A	N/A	N/A	

RECEIVING WATER OBSERVATIONS Receiving water had a slightly milky white color

SECTION H - SLUDGE DISPOSAL

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

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. X S ¨ M ¨ U ¨ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. O S ¨ M ¨ U X NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: HAULED OFF TO ABQ WWTP (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

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

1. SAMPLES OBTAINED THIS INSPECTION. ¨ Y ¨ N X 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
Paa-Ko Communities Wastewater Treatment Plant
NPDES Permit No. NM0030724

Introduction

On May 18, 2011, Sarah Holcomb of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) accompanied by Sandra Gabaldón (also of NMED SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Paa-Ko Wastewater Treatment Plant (WWTP). The Paa-Ko WWTP has a design flow capacity of 0.10 MGD (million gallons per day) and 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 NM0030724. This permit regulates the WWTP discharge to San Pedro Creek in the Rio Grande Basin in Segment 20.6.4.125 according to the *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC*. This segment includes the designated uses of coldwater aquatic life, irrigation watering, wildlife habitat and secondary contact.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

Upon arrival at the WWTP at 0830 hours on May 18, 2011, the inspector conducted an entrance interview with Mr. Mike Butler, Field Superintendent for New Mexico American Water, where she presented credentials and explained the purpose of the inspection. Mr. Butler conducted a tour of the facility. An exit interview was conducted with Mr. Butler at the facility at approximately 1015 hours on May 18, 2011 to present the preliminary findings of the inspection.

Treatment Scheme

This facility was previously a subsurface flow constructed wetland with infiltration beds. It was retrofitted with a membrane bioreactor (MBR) microfiltration system and became functional in December 2007. The wastewater treatment plant serves about 345 homes at the time of this inspection. This facility has a total of 9 lift stations. The inflow passes through a storage tank of 22,000 gallons which is kept empty to provide a 12 hour emergency storage capacity. The collection system drains the residential septic systems, which are primarily used as small settling basins. After final grit removal and filtration at the WWTP, the influent then flows to an anoxic basin where denitrification takes place. From the anoxic basin, influent then enters a MBR microfiltration basin. Through the use of a permeate pump, a vacuum is applied to a header connected to the membranes. The vacuum draws treated water through the hollow fiber ultrafiltration membranes. Permeate is then directed to the UV disinfection unit. Intermittent air flow is introduced to the bottom of the membrane module, producing turbulence that scours the external surface of the hollow fibers. This scouring action transfers rejected solids away from the membrane surface. The system is controlled by a programmable logic controller (SCADA) system, which if necessary, can be manually operated. If a system malfunction or power outage problem occurs, the system will call the operators. There is a back up call system in place if the primary system fails. The outside UV system is not connected to the programmable logic system, but plans are in the works to remedy this. Effluent flows to a lined pond for storage, or can be pumped directly to the Paa-Ko Ridge golf course pond.

Sludge Management

The mixed liquor concentration (MLSS) for this type of system can run from 8,000 to 35,000 mg/L (but is optimally run between 12-18,000 mg/L). The wasting is infrequent (1-2 times per quarter) and is accomplished by contracting a septic hauler to pump solids directly out of the MBR basin. The pumped sludge is then hauled to the Albuquerque Water Reclamation Facility.

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 A – Permit Verification Evaluation – Overall rating of *Marginal*

The permit requires in the footnote of Part I.A (*1):

The permittee shall install effluent flow meter downstream from the Golf Course pond and upstream from the arroyo to monitor the flow(s). The flow(s) must be monitored and reported for Outfall 001 when discharge occurs.

Findings for Permit Verification:

The prior inspection of this facility found that the outfall from the facility may not be in the appropriate place to adequately monitor the discharge. The facility is set up so that the effluent travels through the UV system and is discharged to the golf course pond at the Paa-Ko golf course. A discharge occurs when the pond overflows. The effluent flow meter is located on the pipe leaving the golf course pond, which goes to the unnamed ephemeral arroyo, and then to San Pedro Creek. The wastewater treatment plant has no control over any chemicals that may enter the effluent from the pond itself (i.e. pesticides, herbicides, etc.) and during priority pollutant testing for NPDES permit reapplication, these substances are evaluated. There is a sampling port directly after the UV system, so it is possible to consider the discharge from the UV system the final outfall. The discharge from the golf course pond does not accurately reflect the discharge from the wastewater treatment plant as it is greatly diluted with the groundwater that the pond is supplemented with. The permittee's representative indicated that the wastewater treatment plant provides about 40,000 gallons of water per day for irrigation purposes, but the golf course needs about a million gallons per day to meet its watering needs.

Section C - Operations and Maintenance Evaluation – Overall rating of *Satisfactory*

The permit requires in Part III.B.3.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 dsicharges of excessive pollutants and will achieve compliance with the conditions of this permit.

Findings for Operations and Maintenance :

This facility appears to be very well run. The problem currently occurring at the facility is that they are dealing with high influent TDS (~500 mg/L). This is most likely coming from the residents' water softening systems. The community is set up that any discharges from a residence are first sent to a septic tank, which is used as a primary treatment system to settle out solids and other materials. However, the facility has directed residents to discharge the high TDS backwash water from their water softening systems to their septic leach fields to attempt to alleviate the problem. The high TDS influent at the plant is starting to destroy the influent mechanisms at the plant. The operators have replaced the stainless steel of the solids separator at the headworks, but are still dealing with leaks from that piece of machinery.

The facility still does not keep an inventory of spare parts in the event of an emergency. The operator mentioned during the inspection that they have the capability to utilize the EQ basin prior to the headworks in the event of an emergency, which would give the operators twelve hours to fix a problem. However, if the facility needs to order a part, it is unlikely that the operators could get the part within that time frame. The facility should strongly consider having parts, such as extra UV bulbs, on site and readily accessible. There is also still not an emergency generator onsite, but it is stored at the New Mexico American Water storage yard and can be towed to the facility in the event of a power failure. There is an adequate alarm system to immediately notify the operators of a problem at the plant, and there is the capability to retain twelve hours of influent in order to implement a fix.

Section F – Laboratory Evaluation – overall rating of *Satisfactory*

The permit requires in Part III.C.2:

Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.

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

Findings for Laboratory:

The permittee's representative indicated during the inspection that he routinely takes samples for compliance with the facility's ground water discharge permit prior to the UV disinfection system. According to Mr. Butler, the discharge is extremely high quality at this location, including non-detect findings for *E. coli* bacteria. However, there is an access point for sampling after the water has been through the UV system and this sampling point would be utilized if there was ever a discharge from the facility. Since the last inspection in 2009, there has been no discharge.

The inspector quizzed the facility's representative on proper procedure for pH testing in the event of a discharge. The operator was not familiar with the approved method for pH in Part 136, which requires bracketing the expected pH during calibration of the meter. The operators at this facility should review the approved method (Standard Methods 4500 H+ B) and make sure they are familiar with it in the event of a discharge. The facility has contracted Hall Environmental Laboratories in Albuquerque to perform all other testing for them.