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Governor

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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARKLIN
Secretary

BUTCH TONGATE
Acting Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 23, 2011

Mr. Dick Loma
Homeowner Association President
P.O. Box 6395
Navajo Dam, NM 87419

Re: **Minor Non-Municipal; SIC 4941; Compliance Evaluation Inspection; Navajo Dam DWC & MSW Inc. Water Treatment Plant; NM0030953; August 17, 2011**

Dear Mr. Loma,

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.

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. Further, you are encouraged to notify in writing, both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald
US Environmental Protection Agency, Region VI
Suite 1200, 1445 Ross Avenue
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
P.O. Box 5469
Santa Fe, New Mexico 87502

I appreciate the cooperation of Mr. John Eckley while at the Navajo Dam Water Treatment Plant. If you have any questions about this inspection report, please contact me at (505) 827-2575.

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Environmental Scientist/Specialist
Surface Water Quality Bureau

cc: -Marcia Gail Adams, USEPA (6EN-AS) by e-mail
-Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
-Larry Giglio, USEPA (6EN-P) by e-mail
-Samuel Tates, USEPA (6FS) by e-mail
-Diana McDonald, USEPA (6EN-WM) by e-mail
-Robert Italiano, NMED District II Manager (Santa Fe) 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	3	0	9	5	3	11	12	1	1	0	8	1	7	17	18	C	19	S	20	2
Remarks																								
N A V A J O D A M D W C & M S W I N C W T P																								
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) Navajo Dam DWC & MSW, Inc. – Drinking Water Treatment Plant NM0030953 P.O. Box 6395 Navajo Dam, NM 87419	Entry Time /Date 1235 hours/ 8-17-2011	Permit Effective Date 7-30-2007
	Exit Time/Date 1335 hours/ 8-17-2011	Permit Expiration Date 8-31-2012
Driving Directions: From Bloomfield – drive west on HWY 64 to HWY 511 turn left – north, drive to CR 4265, turn left. Go to CR 4267, turn right to WTP on right.		
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. John Eckley/Operations Superintendent/505-634-0539 cell 505-320-7182 fax 505-632-1116	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Dick Loma/ P.O. Box 6395, Navajo Dam, NM 87419/ Homeowners Association President/505-632-0474	GPS: N. 36.80780 W. -107.6971 SIC: 4941	
Contacted 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	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	S	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) Daniel Valenta /s/Daniel Valenta	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2575	Date 8/23/2011
Signature of Management QA Reviewer Richard Powell /s/Richard Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 8/23/2011

Navajo Dam DWC & MSW Inc. Water Treatment Plant
NPDES Permit Number NM0030953
Compliance Evaluation Inspection
August 17, 2011

Introduction

A Compliance Evaluation (CEI) was conducted at the Navajo Dam DWC & MSW Inc. Water Treatment Plant(WTP) on August 17, 2011 by Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The inspection was conducted by NMED for the U. S. Environmental Protection Agency (USEPA), Region 6, under the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the Federal Clean Water Act. These inspections are conducted by NMED under agreement with U.S.EPA and are used by the U.S.EPA to determine compliance with the NPDES permit program. 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 and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative Further Explanations section of this report.

Navajo Dam DWC & MSW Inc. is classified as a minor non-municipal industrial discharger; with a process water capacity of a maximum of 83,000 Gallons Per Day (GPD) during the summer, holiday, and weekends. The average production is 45,000 GPD, and the low is 13,000 GPD in the off season. The plant treats raw water by coagulation, sedimentation, filtration, and disinfection. The facility's discharge location is to the San Juan River in Water Quality Segment 20.6.4.405 NMAC of the San Juan River Basin. The designated uses of the receiving water are: municipal and industrial water supply, irrigation, livestock watering, wildlife habitat, primary contact, and high quality coldwater aquatic life.

The NMED inspector Daniel Valenta arrived at the WTP at 1235 p.m. on August 17, 2011. The inspector showed his credentials and explained the purpose of the inspection to Mr. John Eckley, Operations Superintendent. After touring the plant, an exit interview was held with Mr. Eckley. The inspector left the treatment plant at 1335 p.m.

Treatment Scheme

Raw water enters the treatment plant from an infiltration gallery in the San Juan River just upstream from the treatment plant to a wet well. Raw water is then pumped into two separate pressure filter systems for treatment. Liquid polymer and alum mix is added for coagulation. Liquid chlorine is added for disinfection. Backwash and rinse water is pumped into a 90,000 gallon backwash pond that is earthen bermed with a High Density Polyethylene Fabrication (HDPF) liner. Overflow from the pond is discharged into a 200,000 gallon earthen bermed settling pond with an HDPE liner.

The Navajo Dam water system is designed to reuse all water in the treatment process and to eliminate all discharges to the San Juan River. An overflow line was installed at the plant as an emergency measure, to protect the area around the plant from unanticipated leaks or spills that might cause the pond to overflow. The discharge pipe is capped at this time. In the event the pond was to fill to the point of needing to discharge, an operator would hand remove the cap to allow discharge. An operator is on site daily and would be able to observe the water level in the pond and respond to high water conditions.

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 NO)

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 NO)

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

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. **Site has not discharged.** 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 **Flow measured by estimate only.**
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. **No Discharge** 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:

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

No samples taken.

LAB ADDRESS

PARAMETERS PERFORMED

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

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	No Discharge						

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