



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT
Surface Water Quality Bureau

Harold Runnels Building, N2050
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.nmenv.state.nm.us

Certified Mail - Return Receipt Requested



RYAN FLYNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

THOMAS SKIBITSKI
Acting Director
Resource Protection Division

June 7, 2013

Robert Davidson, President
Navajo Dam Domestic Water Consumers and Mutual Sewage Works Cooperative, Inc.
P.O. Box 6308
Navajo Dam, New Mexico 87419

RE: Minor Non-Municipal, SIC 4941, NPDES Compliance Evaluation Inspection, Navajo Dam DWC&MSW, Inc. /
Water Treatment Plant (WTP), NM0030953, May 15, 2013

Dear Mr. Davidson:

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. 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
Water Enforcement Branch (6EN-WM)
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin, Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section, Rm 2050
P.O. Box 5469
Santa Fe, New Mexico 87502

I appreciate the cooperation of you and Mr. Casimiro Ruybalid, Operator, Navajo Dam DWC&MSW, Inc. WTP during the inspection. If you have any questions about this inspection report, please contact me at 505-827-0418.

Sincerely,

/s/ Erin S. Trujillo

Erin S. Trujillo
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN) by e-mail
Hannah Branning and Darlene Whitten-Hill, USEPA (6EN-WC) by e-mail
Jan Walker, USEPA (6EN-WC) by e-mail
Carol Peters-Wagon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Brent Larsen and Larry Giglio, USEPA (6WQ-PP) by e-mail
Susanna Perea, USEPA (6WQ-PP) by e-mail
Robert Italiano, District Manager, NMED District II Santa Fe by e-mail



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 3 0 9 5 3 11 12 1 3 0 5 1 5 17 18 C 19 S 20 2					
Remarks					
W T P - E M E R G E N C Y F I L T E R B A C K W A S H					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 3	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Navajo Dam Domestic Water Consumers and Mutual Sewage Works Cooperative, Inc. dba Navajo Dam DWC&MSW, Inc., Water Treatment Plant, 4 County Road (CR) 4267 (Hardgrove Drive, Lot 2 & 3), Navajo Dam, NM 87419. San Juan County.	Entry Time /Date 1430 hours / 05/15/2013	Permit Effective Date September 1, 2007
	Exit Time/Date 1600 hours / 05/15/2013	Permit Expiration Date August 31, 2012 (Expired)
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Robert Davidson, President, Navajo Dam Water Board / 505-634-0236 Casimiro Ruybalid, Water Level 4 Operator, Navajo Dam DWC&NCW, Inc. / 505-334-4921	Other Facility Data Outfall 001 (Source Google Earth) Latitude 36.807939° Longitude -107.696695°	
Name, Address of Responsible Official/Title/Phone and Fax Number Robert Davidson, Navajo Dam Water Board, Navajo Dam Domestic Water Consumers and Mutual Sewage Works Cooperative, Inc., P.O. Box 6308, Navajo Dam, New Mexico 87419 / President / 505-634-0236	Yes <input type="checkbox"/> * <input checked="" type="checkbox"/> No <input type="checkbox"/>	Degree, Minute, Second 36°48'28.58"N, 107°41'48.10"W SIC 4941

Section C: Areas Evaluated During Inspection

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

M	Permit	N	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	N	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 CHECKLIST REPORT WITH FURTHER EXPLANATIONS AND PHOTO LOG.

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 06/07/2013
Signature of Management QA Reviewer Bruce J. Yurdin /s/Bruce J. Yurdin	Agency/Office/Telephone/Fax NMED/SWQB/505-827-2795	Date 06/07/2013

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

 S M U NA (FURTHER EXPLANATION ATTACHED Yes)DETAILS: **Permit expired 08/31/2012. 180 days prior to expiration was 03/04/2012. Application signed 12/21/2012 received by USEPA has not been determined administratively complete as of the writing of this report.**1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE. **See further explanations for complete name and address.** Y N NA2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES. Y N NA3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT. Y N NA4. ALL DISCHARGES ARE PERMITTED. **No discharge** 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: **NMED SWQB files do not contain DMRs after November 2012. No documentation that missing DMRs submitted.**1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. Y N NA2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. S M U NAa) DATES, TIME(S) AND LOCATION(S) OF SAMPLING Y N NAb) NAME OF INDIVIDUAL PERFORMING SAMPLING Y N NAc) ANALYTICAL METHODS AND TECHNIQUES. Y N NAd) RESULTS OF ANALYSES AND CALIBRATIONS. Y N NAe) DATES AND TIMES OF ANALYSES. Y N NAf) NAME OF PERSON(S) PERFORMING ANALYSES. Y N NA3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. S M U NA4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. S M U NA5. 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: **Water level in settling basin was below outlet pipe on day of this inspection. Procedures for water treatment system. But, no written procedures for inspections (e.g., routine or daily logs) and maintenance for ponds to avoid discharge.**1. TREATMENT UNITS PROPERLY OPERATED. S M U NA2. TREATMENT UNITS PROPERLY MAINTAINED. **Backwash basin needed to be cleaned of accumulated solids.** S M U NA3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. **No, but does not appear required for ponds.** S M U NA4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. **SCADA operational** S M U NA5. ALL NEEDED TREATMENT UNITS IN SERVICE S M U NA6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. **Two certified water utility operators** S M U NA7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. S M U NA8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. Y N NASTANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. **But, no written/routine procedures for ponds.** Y N NAPROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. **MSDSs on site, but no other written procedures.** 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 Yes).
 DETAILS: **Last inspection occurred on 08/17/2011. No reported discharge.**
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: **If discharge had occurred, expired permit requires once/day estimate flow measurement subject to accuracy and reliability conditions in Part III.C.6 (flow measurement).**
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE _____
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. 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 Yes)
 DETAILS: **If discharge had occurred, expired permit requires monitoring (e.g., on-site pH & TRC, other analysis by contract lab).**
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. ____% 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
LAB ADDRESS
PARAMETERS PERFORMED

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
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

Navajo Dam DWC&MSW, Inc. Water Treatment Plant
NPDES Permit No. NM0030953
Compliance Evaluation Inspection
May 15, 2013

Further Explanations

Introduction

On May 15, 2013, Erin Trujillo, of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Navajo Dam DWC&MSW, Inc. public water treatment plant in Navajo Dam, San Juan County, New Mexico. The permit 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 NM0030953 which regulates emergency discharge of "backwash and flush water" to outfall 001 to the San Juan River (Cañon Largo to Navajo Reservoir) in Segment 20.6.4.405 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC)*. This segment includes the designated uses of high quality coldwater aquatic life, irrigation, livestock watering, wildlife habitat, public water supply, industrial water supply and primary contact.

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 representatives, observations made by the NMED inspector, and records and reports kept by the Permittee and/or NMED.

Upon arrival at the water treatment plant at approximately 1430 hours on the day of this inspection, the inspector made introductions, presented credentials and explained the purpose of the inspection. The inspector, Mr. Robert Davidson, President, Navajo Dam Water Board and Mr. Casimiro Ruybalid, Operator, both of the Navajo Dam DWC&MSW, Inc. toured the plant. After the tour, an exit interview to discuss preliminary findings was conducted with Mr. Davidson and Mr. Casimiro on site. The inspector left the facility at approximately 1600 hours on the day of this inspection.

Treatment Scheme

The public drinking water system of the Navajo Dam DWC&MSW, Inc. serves approximately 300 customers (population of 458 is indicated on NMED Drinking Water Bureau web site). The plant was upgraded with holding ponds installed in 2006. In March of 2012, upgrades to the water treatment plant were completed. Testing of the new Supervisory Control and Data Acquisition (SCADA) control system was in progress on the day of this inspection.

Raw water from a San Juan River infiltration gallery enters an intake wet well. From the wet well, raw water is pumped into two separate pressure filter systems for treatment. Water is reused in the treatment process. Primary and secondary coagulants (liquid polymer and alum mix) and Potassium Permanganate to reduce trihalomethanes is added to the water. Water enters a flocculation tank with variable speed paddle mixer, then settling tank with tube settlers. Water then flows through one of two 150 micron self-cleaning filters installed in parallel. Additional chemical cleaning and water treatment chemicals (Sodium Hypochlorite, caustics and/or acid to control algae) are fed into the water treatment system. Liquid chlorine is added for disinfection prior to distribution.

Backwash (filter to waste) and rinse water is pumped to a 90,000-gallon earthen bermed backwash pond (pond 1) with High Density Polyethylene Fabrication (HDPE) liner. Overflow from the backwash pond flows to a 200,000-gallon earthen-bermed settling pond (pond 2) with HDPE liner. A floor drain near the flocculation and settling tank inside the treatment plant is connected to a pipe that enters the settling pond. An overflow line (pipe) was installed at the top of the settling pond with an outfall on a braid of the San Juan River (see Figure 1: Vicinity

Map). To allow a discharge at the outfall, the cap of the overflow line pipe would need to be removed by hand. If discharge were to occur, the following discharge flows were estimated on the Navajo Dam DWC&MSW, Inc. 2012 application: maximum daily flow of 4,000 gallons and average daily flow of 3,600 gallons (i.e., 0.004 and 0.0036 million gallons per day (MGD), respectively).

Figure 1: Vicinity Map



Section A - Permit Verification – Overall Rating of “M = Marginal”

Permit Requirements for Permit Verification

Part III.A.4 (Standard Conditions, Duty to Reapply) of the permit states:

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application shall be submitted at least 180 days before the expiration date of this permit. The Director may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date. Continuation of expiring permits shall be governed by regulations promulgated at 40 CFR Part 122.6 and any subsequent amendments.

Findings for Permit Verification

According to New Mexico Public Regulation Commission (NMPRC) on-line corporation query, Navajo Dam’s public water and sewage nonprofit is listed as Navajo Dam Domestic Water Consumers and Mutual Sewage Works Cooperative, Inc. as of September 29, 1980. Based on applications, the nonprofit also does business as Navajo Dam DWC&MSW, Inc.

Navajo Dam DWC&MSW, Inc. emergency discharge permit expired August 31, 2012. An application signed/certified on December 21, 2012 was received by USEPA Region 6. The application has not been determined administratively complete by USEPA Region 6 as of the writing of this report. As indicated on the application, changes to correct addresses on the permit will be needed.

Section B - Recordkeeping and Reporting Evaluation – Overall Rating of “M = Marginal”

Permit Requirements for Recordkeeping and Reporting

Part II.C of the permit states:

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. 1. Reporting periods shall end on the last day of the months March, June, September, and December. 2. The permittee is required to submit regular monthly reports as described above postmarked no later than the 28th day of the month following each reporting period. 3. NO DISCHARGE REPORTING If there is no discharge from any outfall during the sampling month, place an "X" in the NO DISCHARGE box located in the upper right corner of the Discharge Monitoring Report.

Findings for Recordkeeping and Reporting

NMED SWQB files do not contain DMRs after October 2012. Documentation that DMRs were submitted after October 2012 was not available on site.

Section C - Operations and Maintenance – Overall Rating of “M = Marginal”

Permit Requirements for Operations and Maintenance

Part I.A.1 of the permit states:

...the permittee is NOT authorized to discharge backwash and flush water to the San Juan River...permittee shall take all reasonable steps to prevent a discharge.

Part II.C (Affirmative Defense for Emergency Discharge) states:

This is a “No Discharge” permit. The permittee shall take all reasonable steps to prevent a discharge. In case a discharge occurs due to emergency conditions, the permittee shall submit an affirmative defense which includes: 1. The cause of emergency conditions occurring; 2. The operating logs or relevant evidences which demonstrate that the facility was at the time being properly operated; 3. Documentation showing that all reasonable steps have been taken to minimize the discharge; and 4. Whether or not any flow reached the San Juan River.

Part III.B.3.a (Standard Conditions, Proper Operation and Maintenance) of the permit 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.... 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.

Part III.B.6 (Standard Conditions, Removed Substances) of the permit states:

Unless otherwise authorized, solids, sewage sludges, filter backwash, or other pollutants removed in the course of treatment or wastewater control shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.

Findings for Operation and Maintenance

On the day of this inspection, settled solids had accumulated in the backwash pond reducing the capacity. Floating solids were also observed. According to the on-site representatives, solids from the backwash pond needed to be removed. The pond was last cleaned out in 2009 according to the on-site representatives.

Written operation and maintenance procedures and routine inspection logs of the water treatment plant did not include the ponds. Examples of procedures and record keeping include, but are not limited to: pond maintenance schedules, daily or routine pond inspection logs, dates of pond maintenance and repair, proper disposal of removed pond solids.

There were no written procedures for emergency treatment control (**this is a repeat finding**), or in this case, reasonable steps to minimize a discharge in the event of high water level conditions, spills within (floor drain) and outside the plant, etc.

Sections D - Self-Monitoring, E – Flow Measurement, and F – Laboratory

Permit Requirements

Part III.B.3.a (Standard Conditions, Proper Operation and Maintenance) of the permit also states:

Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.

Comments

Self-monitoring, flow measurement, and laboratory were not evaluated because there had been no reported discharge. Adequate laboratory controls and appropriate quality assurance procedures have also not been developed in the event of an emergency discharge. Examples of effluent monitoring procedure for flow measurement, sample collection, analytical procedures (see Parts III.B.3, C.2, C.5, and C.6 of the permit), that would need to be prepared prior to a discharge include, but are not limited to:

- Appropriate flow measurement methods consistent with accepted scientific practices to estimate (calculate) flows rates;
- Sample collection procedures, including locations for representative sampling;
- Sample collection preservation techniques, containers, and sample holding times;
- Copies of test procedures for pH and Total Residual Chlorine (TRC) approved under 40 CFR Part 136;
- Arrangements with contract laboratories, including Whole Effluent Toxicity testing, to ensure that other required monitoring is by methods approved under 40 CFR Part 136;
- Calibration and maintenance of instruments and equipment procedures; and
- Quality control procedures (e.g., duplicate samples, chain of custody).

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Erin S. Trujillo	Date: 05/15/2013	Time: 1457 hours
City/County: Navajo Dam / San Juan County	State: New Mexico	
Location: Navajo Dam DWC&MSW, Inc. Water Treatment Plant, NM0030953		
Subject: Drain inside treatment plant below tanks valve discharge. According to on-site representatives, drain is connected to pipe that flows to settling basin.		



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Erin S. Trujillo	Date: 05/15/2013	Time: 1528 hours
City/County: Navajo Dam / San Juan County	State: New Mexico	
Location: Navajo Dam DWC&MSW, Inc. Water Treatment Plant, NM0030953		
Subject: Floatable solids and settled solids in backwash basin (pond 1).		



**NMED/SWQB
Official Photograph Log
Photo # 3**

Photographer: Erin S. Trujillo	Date: 05/15/2013	Time: 1529 hours
City/County: Navajo Dam / San Juan County		State: New Mexico
Location: Navajo Dam DWC&MSW, Inc. Water Treatment Plant, NM0030953		
Subject: Capped outlet pipe in settling basin (pond 2). A dried solid line was observed at the pipe, but there was no evidence of overtopping of the pond.		



**NMED/SWQB
Official Photograph Log
Photo # 4**

Photographer: Erin S. Trujillo	Date: 05/15/2013	Time: 1539 hours
City/County: Navajo Dam / San Juan County		State: New Mexico
Location: Navajo Dam DWC&MSW, Inc. Water Treatment Plant, NM0030953		
Subject: Outfall 001. No discharge.		

