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Deputy Secretary

THOMAS SKIBITSKI
Acting Director
Resource Protection Division

June 12, 2013

Barry Longwell, Manager
Four Corners Construction Office
U.S. Department of Interior (USDOI), Bureau of Reclamation (BOR)
2200 Bloomfield Highway
Farmington, New Mexico 87401

RE: Minor Non-Municipal, SIC 4941, NPDES Compliance Evaluation Inspection, USDOI BOR / Navajo Gallup
Water Supply Pilot Plant Project, NM0031089, May 15, 2013

Dear Mr. Longwell:

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
P.O. Box 5469
Santa Fe, New Mexico 87502

I appreciate the cooperation of Darryl Good and Robert A. Jurenka, both of USDOI BOR, during and after 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
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 1 0 8 9 11 12 1 3 0 5 1 5 17 18 C 19 S 20 2					
Remarks					
W A T E R S U P P L Y P I L O T P L A N T					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 2	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>) U.S. Department of Interior (USDOI) Bureau of Reclamation, Navajo Gallup Water Supply Pilot Plant Project, previously located on Public Service Company of New Mexico owned land at 3891 US Hwy 64, Fruitland, New Mexico. San Juan County.	Entry Time /Date ~1115 hours / 05/15/2013	Permit Effective Date February 24, 2011
	Exit Time/Date ~1320 hours / 05/15/2013	Permit Expiration Date February 23, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Darryl Good, P.E., Civil Engineer / Contract Administrator, USDOI, Bureau of Reclamation / 505-324-5056	Other Facility Data <u>Previous Outfall Location</u> Latitude 36.750108° Longitude -108.413117° SIC 4941	
Name, Address of Responsible Official/Title/Phone and Fax Number Barry Longwell, Four Corners Construction Office, U.S. Department of Interior, Bureau of Reclamation, 2200 Bloomfield Highway, Farmington, New Mexico 87401 / Manager / 505-325-1794	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	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	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	U	Laboratory	N	Storm Water	N	Other:

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

- Navajo Gallup Water Supply Pilot Plant Project's NPDES permit has expired.
- Discharge stopped on 08/31/2013. Associated treatment works, equipment and outfall have been dismantled and removed.
- See attached checklist report, further explanations and photo log.
- The permittee submitted a letter dated 06/07/2013 to USEPA Region 6 to terminate the permit.

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 06/12/2013
Signature of Management QA Reviewer Bruce J. Yurdin /s/Bruce J. Yurdin	Agency/Office/Telephone/Fax NMED/SWQB/505-827-2795	Date 06/12/2013

US BOR Navajo Gallup Water Supply Pilot Plant Project - May 15, 2013

PERMIT NO. **NM0031089**

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS: **Permit expired. No discharge on day of inspection. Pilot plant equipment and outfall dismantled and removed.**

- 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: **Record keeping and analytical laboratory results for April 2012 provided on 06/03 and 06/10/2013.**

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. Y N NA
- 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. **pH, TRC and Ammonia** S M U NA
 - a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING **pH, TRC and Ammonia (times)** Y N NA
 - b) NAME OF INDIVIDUAL PERFORMING SAMPLING **pH, TRC and Ammonia** Y N NA
 - c) ANALYTICAL METHODS AND TECHNIQUES. **pH, TRC and Ammonia** Y N NA
 - d) RESULTS OF ANALYSES AND CALIBRATIONS. **pH, TRC and Ammonia** Y N NA
 - e) DATES AND TIMES OF ANALYSES. **pH, TRC and Ammonia (times)** Y N NA
 - f) NAME OF PERSON(S) PERFORMING ANALYSES. **pH, TRC and Ammonia** Y N NA
- 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. **Not evaluated** S M U NA
- 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. **Not evaluated** S M U NA
- 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. **See Table 2** Y N NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS: **Pilot plant dismantled and removed.**

- 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 Yes).
 DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. **Not evaluated (outfall removed/dismantled)** Y N NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. **Not evaluated (outfall removed/dismantled)** Y N NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. **Grab 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. **Sample collected and analyzed, but one TSS in April 2012 invalid** Y N NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE Y N NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. Y N NA

b) PROPER PRESERVATION TECHNIQUES USED. **Not documented for Ammonia** Y N NA

Holding times for pH & TRC not documented.
 c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. **One TSS sample exceeded holding time.** 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: **Pilot plant flow measurement device removed. April 2012 recordkeeping consistent w/ DMR (see Section B).**

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: **Reviewed record keeping and analytical data for April 2012 provided on 06/03 and 06/10/2013.**

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) **pH and TRC not documented** 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. **Not evaluated** S M U NA

Chain of Custody used for contract laboratory. TSS had QC summary.

4. QUALITY CONTROL PROCEDURES ADEQUATE. **But, QA/QC for Ammonia, TRC, pH not documented on logs.** S M U NA

5. DUPLICATE SAMPLES ARE ANALYZED. **TSS 100** % OF THE TIME. **Ammonia = N (Not documented)** Y N NA

6. SPIKED SAMPLES ARE ANALYZED. **TSS 100** % OF THE TIME. **Ammonia = N (Not documented)** Y N NA

7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME **1) MWH Laboratories (626-386-1100)** **2) SeaCrest Group (303-661-9324)**
 LAB ADDRESS **760 Royal Oak Drive, Ste 100, Monrovia, CA 91016-3629** **1341 Cannon Street, Louisville, CO 80027-1455**
 PARAMETERS PERFORMED **TSS** **WET**

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
removed	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

**U.S. Department of Interior (USDOI) Bureau of Reclamation (BOR)
Navajo Gallup Water Supply Pilot Plant Project
NPDES Permit No. NM0031089
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 U.S. Department of Interior (USDOI), Bureau of Reclamation (BOR) Navajo Gallup Water Supply Pilot Plant Project previously located on Public Service Company of New Mexico owned land at 3891 U.S. Hwy 64, Fruitland, 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. NPDES permit number NM0031089 authorized discharge of treated wastewater to Outfall 001 to the San Juan River, from Navajo Nation boundary at the Hogback upstream to its confluence with the Animas River, in Segment 20.6.4.401 *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 public water supply, industrial water supply, irrigation, livestock watering, wildlife habitat, primary contact, marginal coldwater aquatic life and warmwater aquatic life.

Upon arrival at the BOR Four Corners Construction Office at 2200 Bloomfield Highway, Farmington, New Mexico at approximately 1115 hours on the day of this inspection, the inspector made introductions, presented credentials and explained the purpose of the inspection to Darryl Good, P.E., Civil Engineer, Four Corners Construction and Barry Longwell, Construction Office Manager. The inspector and Mr. Good traveled to and toured the location where the pilot plant and associated outfall was previously located. After the tour, an exit interview to discuss preliminary findings was conducted with Mr. Good. The inspector left the Four Corners Construction Office at approximately 1320 hours on the day of this inspection.

Not all records were retained and/or readily available for review at the Four Corners Construction Office. Summary and additional information on flow measurements and monitoring was received from Robert A. Jurenka, P.E., Environmental Engineer, BOR by e-mail on June 3 and June 10, 2013.

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.

Navajo Gallup Water Supply Pilot Plant Project

The short-term pilot scale demonstration project was to test various processes for treating San Juan River water to be used for a drinking water system for several small communities including City of Gallup, New Mexico. Treatment systems consisted of pre-sedimentation, coagulation, micro- and ultra- membrane filtration, and ultra-violet and chloramine disinfection. Discharge from the pilot plant occurred from March 2, 2012 to August 31, 2012. Reported effluent monitoring is summarized in Table 1. ARCADIS/Malcolm Pirnie, Inc. Denver, Colorado, the architectural and engineering firm contracted by BOR to conduct the pilot project, demobilized and was off site by mid-September of 2012. As observed on the day of this inspection, associated treatment works, equipment, and outfall had been dismantled and removed. Gravel covered the site. No remaining solids from the treatment systems were observed on site.

Section B - Recordkeeping and Reporting Evaluation – Overall Rating of “U = Unsatisfactory”
Section C – Self-Monitoring Evaluation – Overall Rating of “U = Unsatisfactory” and
Section E – Laboratory Evaluation – Overall Rating of “U = Unsatisfactory”

Permit Requirements for Recordkeeping and Reporting

Part I.C. (Monitoring and Reporting) of the permit states:

Monitoring results must be reported either using the electronic or paper Discharge Monitoring Report (DMR) approved formats to EPA. If using paper DMR forms, the report shall be also sent to NMED and shall be submitted quarterly. Each quarterly submittal shall include separate forms for each month of the reporting period. See Part III, D.4 of the permit. 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 quarterly reports as described above postmarked no later than the 28th day of the month following each reporting period.

PART II.D.3.c (Whole Effluent Toxicity (WET) Testing Reporting) of the permit states:

The permittee shall report the following results of each valid toxicity test...i. Pimephales promelas (Fathead minnow) (A) If the No Observed Effect Concentration (NOEC) for survival is less than the critical dilution, enter a "1"; otherwise, enter a "0" for Parameter No. TEM6C. (B) Report the NOEC value for survival, Parameter No. TOM6C. (C) Report the highest (critical dilution or control) Coefficient of Variation, Parameter No. TQM6C. ii. Daphnia pulex (A) If the NOEC for survival is less than the critical dilution, enter a "1"; otherwise, enter a "0" for Parameter No. TEM3D. (B) Report the NOEC value for survival, Parameter No. TOM3D. (C) Report the highest (critical dilution or control) Coefficient of Variation, Parameter No. TQM3D.

Part III.A.3 (Retention of Records) of the permit states:

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

Part III.C.4 (Monitoring and Records, Record Contents) of the permit states:

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 techniques or methods used; and*
- f. The results of such analyses.*

Part III.D.8 (Other Noncompliance) of the permit states:

The permittee shall report all instances of noncompliance not reported under Parts III.D.4 and D.7 and Part I.B (for industrial permits only) at the time monitoring reports are submitted. The reports shall contain the information listed at Part III.D.7.

Permit Requirements for Self-Monitoring and Laboratory Evaluation

Part I of the permit states:

NPDES PERMIT No. NM0031089						Page 1 of PART I	
<u>PART I – REQUIREMENTS FOR NPDES PERMITS</u>							
<u>SECTION A. LIMITATIONS AND MONITORING REQUIREMENTS</u>							
1. FINAL Effluent Limits – Intermittent Flow							
During the period beginning the effective date of the permit and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge treated wastewater to the San Juan River, in Segment Number 20.6.4.401, from Outfall 001. Such discharges shall be limited and monitored by the permittee as specified below:							
EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
		Standard Units					
POLLUTANT	STORET CODE	MINIMUM		MAXIMUM		MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	00400	6.6		9.0		Once/Week (*1)	Grab
EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
		lbs/day, unless noted		mg/l, unless noted (*2)			
POLLUTANT	STORET CODE	30-DAY AVG	DAILY MAX	30-DAY AVG	DAILY MAX	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	50050	Report MGD	Report MGD	***	***	Daily	Estimate (*3)
Total Suspended Solids (*8)	00530	Report	Report	20	30	Once/Week (*1)	Grab
Ammonia, Total as N	00610	Report	Report	Report	Report	Once/Week (*1)	Grab
Total Residual Chlorine	50060	N/A	N/A	N/A	19 ug/l	Daily (*1, *4)	Instantaneous Grab (*4)

Part III.C.5 of the permit states:

Monitoring must be conducted according to test procedures approved under 40 CFR Part 136.

Part III.C.5 (Monitoring Procedures) of the permit states:

- 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.*
- c. *An adequate analytical quality control program, including the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.*

Findings

NMED SWQB files did not contain Discharge Monitoring Reports (DMRs) after September 2012 on the day of this inspection. “No Discharge” DMRs from October 2012 to the expiration date of permit were submitted USEPA following this inspection (letter dated May 24, 2013).

NMED SWQB files contained a full report of WET bio-monitoring, but did not contain a DMR with bio-monitoring results for each species (i.e., Pimephales promelas parameters NOEC, TEM6C, TOM6C, TQM6C and Daphnia pulex parameters NOEC, TEM3D, TOM3D, TQM3D).

Daily and weekly logs for April 4, April 11, April 19 (w/data for April 18), April 24, and April 30, 2012 was provided for review. Logs included pH, Total Residual Chlorine and Ammonia analytical results, but did not contain time of sampling or measurements; the individual(s) who performed the sampling or measurements; time(s) analyses; individual(s) who performed the analyses; or analytical techniques or methods used.

One TSS sample, collected on April 4, 2012, did not conform to holding times for approved methods. Table II of 40 CFR 136.3 lists required containers, preservation techniques, and holding times. In Table II, the maximum holding time for TSS is 7 days with the following footnote: *“Samples should be analyzed as soon as possible after collection. The times listed are the maximum times that samples may be held before the start of analysis and still be considered valid.”* Summary information for April 4, 2012 used by BOR to complete DMRs indicated *“TSS Sample analyzed past holding time.”* The contract laboratory result report and chain of custody form indicate that a TSS sample was collected on 04/04/2012 at 1430 hours and analyzed on 04/13/2012 at 1426 hours. BOR’s April 2012 DMR did not indicate any non-compliance for invalid data that resulted in TSS not being performed at frequency, in this case TSS once/week, required in the permit.

For Ammonia, 40 CFR 136.3 Table II lists preservation, in this case, cool, $\leq 6^{\circ}\text{C}$, H₂SO₄ to pH <2. Preservation was not recorded on provided April 2012 handwritten logs or summary information. No duplicate or spike quality control procedures documented were documented on daily or weekly logs.

For pH & TRC, 40 CFR 136.3 Table II lists instantaneous holding times, in this case, *“Analyze within 15 minutes.”* Holding times (times for sample collection and analysis) was not recorded on provided April 2012 handwritten logs or summary information.

BOR’s contracted firm may have additional information to document that quality control procedures during effluent monitoring were adequate. These records would also need to be retained by the Permittee per Part III.A.3 of the permit.

Table 1: Summary of Reported and Record Keeping for Effluent Monitoring

	pH		Flow		TSS				Ammonia Total as N,				TRC
	min	max	30-Day Avg	Daily Max	30-Day Avg	Daily Max	30-Day Avg	Daily Max	30-Day Avg	Daily Max	30-Day Avg	Daily Max	Daily Max
	s.u.	s.u.	MGD	MGD	lbs/day	lbs/day	mg/l	mg/l	lbs/day	lbs/day	mg/L	mg/L	ug/l
	6.6	9.0	Report	Report	Report	Report	20	30	Report	Report	Report	Report	19
08/2012	8.27	8.72	0.043	0.069	4.50	5.73	<10.0	<10.0	0.03	0.11	0.07	0.22	0.00
07/2012	7.98	8.70	0.042	0.071	5.29	5.85	<10.0	<10.0	0.02	0.04	0.04	0.07	0.00
06/2012	7.42	7.67	0.063	0.075	5.40	6.27	<10.0	<10.0	0.03	0.06	0.04	0.10	0.00
05/2012	7.36	7.63	0.054	0.067	4.98	5.60	<10.0	<10.0	0.01	0.02	0.02	0.04	0.00
04/2012	7.09	7.52	0.045	0.060	3.48	4.90	<10.0	<10.0	0.01	0.03	0.03	0.07	0.00
03/2012	7.23	7.52	0.046	0.066	4.6	5.5	<10.0	<10.0	0.01	0.03	0.02	0.07	0.00

Table 2: Loading Calculation Checks for April 2012

Date	Daily Flow (MGD)	x	TSS (mg/L)	x 8.34 =	Loading (lbs/day)
4/04/2012	0.023	x	Result Not Valid	x 8.34 =	Not Valid
4/11/2012	0.059	x	<10*	x 8.34 =	4.92 (Daily Max)
4/18/2012	0.028	x	<10	x 8.34 =	2.34
4/24/2012	0.028	x	<10	x 8.34 =	2.34
4/30/2012	0.051	x	<10	x 8.34 =	4.25
	Average		<10		3.46

*Based on summary information

Date	Daily Flow (MGD)	x	Ammonia Total as N (mg/L)	x 8.34 =	Loading (lbs/day)
4/04/2012	0.023	x	0.02	x 8.34 =	0.0038
4/11/2012	0.059	x	0.07 (Daily Max)	x 8.34 =	0.034 (Daily Max)
4/18/2012	0.028	x	0.04	x 8.34 =	0.0093
4/24/2012	0.028	x	0.02	x 8.34 =	0.0047
4/30/2012	0.051	x	0.00	x 8.34 =	0
	Average		0.03		0.010

**MED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Erin S. Trujillo	Date: 05/15/2013	Time: 1244 hours
City/County: Navajo Dam / San Juan County	State: New Mexico	
Location: Previous location of Navajo Gallup Water Supply Pilot Plant Project - NM0031089		
Subject: Location of previous outfall at San Juan River according to permittee representative. Treatment system and outfall removed.		



**NMED/SWQB
Official Photograph Log
Photo # 2**

Photographer: Erin S. Trujillo	Date: 05/15/2013	Time: 1248 hours
City/County: Fruitland / San Juan County	State: New Mexico	
Location: Previous location of Navajo Gallup Water Supply Pilot Plant Project - NM0031089		
Subject: Location of previous pilot plant according to permittee representative. Treatment system equipment removed.		

