NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

RYAN FLYNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

July 10, 2013

Ms. Dora M. Romero, School Superintendent
Mora Independent School District
PO Box 179
Mora, NM 87732-0179

Re: Minor Industrial, SIC 4971, NPDES Compliance Evaluation Inspection, Mora Independent School District Athletic Field, NM0031097, July 2, 2013

Dear Ms. Romero:

Enclosed, please find a copy of the report and checklist 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 Balthazar Olivas while at the Mora Independent School District. 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: Jan Walker, USEPA (6EN-AS) by e-mail
Darlene Whitten-Hill, USEPA (6EN-AS) by e-mail
Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Larry Giglio, USEPA (6EN-P) by e-mail
Bob Italiano, NMED District 1 Manager (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 9 7 11	12 1 3 0 7 0 2 17	18 C	19 S 20	2

Remarks

M	I	N	O	R		W	W	T	P																		

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 1	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)*
Mora Independent School District Athletic Field, Mora, San Miguel County, NM: From Albuquerque, take I-25 North to Las Vegas and take Exit 345. Turn left on University Blvd., then right on Hwy 518. Follow Hwy 518 to Mora and the school complex will be on the left side.

Entry Time /Date
1015 hours / 7-2-2013

Permit Effective Date
9-1-2012

Exit Time/Date
1115 hours / 7-2-2013

Permit Expiration Date
8-31-2017

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Mr. Balthazar Olivas, Maintenance Manager, Mora ISD (575) 447-2811

Other Facility Data

GPS:
N. 35° 58’ 34.26”
W -105° 19’ 59.13”

SIC: 4971

Name, Address of Responsible Official/Title/Phone and Fax Number
Ms. Dora M. Romero, Superintendent, Mora Independent School District
PO Box 179, Mora, NM 87732 (575) 387-3106

Contacted
Yes * No

Section C: Areas Evaluated During Inspection

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

S	Permit	U	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	U	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	U	Laboratory	N	Storm Water	N	Other:

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

1. **Inspectors arrived at the facility at 1015 hours on July 2, 2013. The inspectors conducted an entrance interview with Mr. Balthazar Olivas, Maintenance Manager, and Ms. Dora Romero, School Superintendent, where they made introductions, presented credentials and explained 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. Olivas and Ms. Romero at the facility at approximately 1100 hours on July 2, 2013.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sarah Holcomb */s/ Sarah Holcomb*	**505-222-9587**	**7-10-2013**
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Bruce Yurdin */s/ Bruce Yurdin*	**505-827-2795**	**7-10-2013**

Mora Independent School District Activity Field Project	PERMIT NO. NM0031097

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 YES)*
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 YES)*
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

Mora Independent School District Activity Field Project	PERMIT NO. NM0031097

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.	☐ 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. TYPE OF DEVICE In-line totalizer	☐ Y ☐ N ☐ NA
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 NO)*
DETAILS:

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

Mora Independent School District Activity Field Project	PERMIT NO. NM0031097

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

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	No Discharge	No Discharge	No Discharge	No Discharge	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 ___).*

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
Mora Independent School District Athletic Field Project
NPDES Permit No. NM0031097
July 2, 2013

Introduction

On July 2, 2013, Sarah Holcomb and Sandra Gabaldón of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Mora Independent School District Athletic Field Project. The Athletic Field Project has an intermittent flow design (the system is only used when the ground water table is high) 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 NM0031097. This permit regulates the WWTP discharge to the Mora River in the Canadian Basin in Segment 20.6.4.309 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 domestic water supply, irrigation, high quality coldwater aquatic life, livestock watering, wildlife habitat, and primary 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 facility at 1015 hours on July 2, 2013, the inspectors conducted an entrance interview with Ms. Dora Romero, School Superintendent, and Mr. Balthazar Olivas, Maintenance Manager, where they made introductions, presented credentials and explained the purpose of the inspection. Mr. Olivas conducted a tour of the facility. An exit interview was conducted with Ms. Romero and Mr. Olivas at the facility at approximately 1100 hours on July 2, 2013 to present the preliminary findings of the inspection.

Treatment Scheme

The Mora High School Athletic Field is located in an area where the ground water table is typically high during the spring runoff season. Historically, this would cause issues with standing water in the field. In 2012, a project was started to resolve the standing water issue.

There are three ground water pumps (with MagMeter flow meters) installed at the athletic field to pump groundwater that reaches a depth above 21 feet to the Mora River. According to facility representatives, their most recent discharge was for 3-4 weeks in May-June 2012. The NPDES permit for this facility was issued in September 2012, and according to the maintenance manager, there has not been a discharge since due to the drought conditions in the area.

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 B – Recordkeeping and Reporting Evaluation – Overall rating of *Unsatisfactory*

The permit states in Part I.C:

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 also be 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.*

Findings for Recordkeeping and Reporting:

The facility representatives indicated to the inspectors during the entrance interview and facility tour that they were unaware that they had been issued an NPDES permit. Consequently, there was no paperwork kept to show the maintenance and operation of the facility, and no Discharge Monitoring Reports had been submitted to EPA or NMED. The inspector also discussed the availability of the NetDMR system with the permittee's representatives and emailed information to Ms. Romero on July 3 on how to access training on this system.

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

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

Findings for Operations and Maintenance :

The permittee appeared to be operating the facility as they should in accordance with the permit, however, proper operation and maintenance also includes requirements for recordkeeping to document that proper operation is occurring. Recordkeeping in this instance should be in the form of a spare parts and supply inventory that is up to date, an operations and maintenance manual for the mechanical equipment, a standard operating procedure for staff, and procedures to follow in the event of an emergency situation.

Section D – Self Monitoring Evaluation – overall rating of *Unsatisfactory*

The permit states in Part I.A.1:

EFFLUENT	DISCHARGE LIMITATIONS Standard		MONITORING REQUIREMENTS	
POLLUTANT	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	6.6	8.8	Once/Month (*1)	Grab

EFFLUENT CHARAC	DISCHARGE LIMITATIONS				MONITORING REQUIREME	
	lbs/day, unless noted		mg/l, unless noted (*2)			
POLLUTANT	30-DAY AVG	DAILY MAX	30-DAY AVG	DAILY MAX	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	Report MGD	Report MGD	*	***	D	Measure

TSS (*3)	Report	Report	Report	Report	Once/Month (*1)	Gra
TSS (*4)	318	Report	8.	Report	Once/Month (*1)	Gra
TDS (*3)	Report	Report	Report	Report	Once/Month (*1)	Gra
TDS (*4)	12,970	Report	3	Report	Once/Month (*1)	Gra

EFFLUENT CHARACTERISTICS	DISCHARGE MONITORING		MONITORING REQUIREMENTS	
Whole Effluent Toxicity Testing (48-Hour Static Renewal) (*5)	30-DAY AVG MINIMUM	48-HOUR MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Daphnia pulex	Report	Report	Once (*6, 7)	24-Hour
Pimephales promelas	Report	Report	Once (*6, 7)	24-Hour

And, the permit states in Part I.B.1:

1. *TSS and TDS:*
   The permittee shall comply with the following schedule of activities for the attainment of state water quality standards-based interim effluent limitations for TSS and TDS, at Final Outfall 001.
   a. Develop control options, if needed;
   b. Evaluate and select control mechanisms;
   c. Implement corrective action; and
   d. Attain interim effluent limitations no later than two (2) years from the permit effective date (PED).
   The permittee shall submit quarterly progress reports, to both EPA and NMED, in accordance with the following schedule. The requirement to submit quarterly progress reports shall expire two (2) years from the PED. No later than 14-days after the date compliance with the TDS and TSS limits have been met; the permittee shall submit a written final report to both the EPA and State, stating that compliance has been completed. If at any time during the two (2) years compliance period the permittee determines that full compliance will not be met within the time allowed, a separate report shall be sent to both EPA and the State stating the explanation for this delay and proposed remedial actions.

The compliance schedules shown above shall report progress reports (sic) according to the following schedule:

PROGRESS REPORT DATES
January 1
April 1
July 1
October 1

Findings for Monitoring and Reporting:

As mentioned earlier in this report, the permittee's representatives were unaware that an NPDES permit had been issued for the ground water purge discharge. As such, no records of maintenance, operations, or any other paperwork had been created or kept for the purpose of compliance with the NPDES permit. DMRs had not been submitted to either EPA or NMED, and progress reports as required in the permit (above) also had not been submitted. At the time of this inspection report, the progress reports for January 1, April 1 and July 1 were missing.

Section E – Flow Measurement Evaluation – overall rating of *Marginal*

The permit states in Part III.C.6:

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.

Findings for Flow Measurement:

Although the flow meters on site looked to be in good repair, there was no documentation available of the calibration or overall functionality of the meters. When the discharge occurred prior to this permit's issuance, no records were kept of the accuracy of the flow meters as well. Flow is a critical measurement in assessing what impact this discharge has on the receiving water.

Section G – Effluent/Receiving Waters Observation Evaluation – overall rating of *Marginal*

The permit states in Part III.A.2:

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Findings for Effluent/Receiving Waters Observations:

According to the permittee's representatives, there has been no discharge from this facility since the permit was issued in September 2012. The only discharge occurred in May and June 2012, prior to coverage under the NPDES permit. The permittee must take care to ensure that the proper procedures are in place to adequately sample and evaluate the discharge as per the permit terms prior to the next discharge occurring.

NMED/SWQB

Official Photograph Log
Photo # 1

Photographer: Sarah Holcomb	Date: 7-2-2013	Time: 1044 hours
City/County: Mora, Mora County		
Location: Mora Independent School District, High School Athletic Field		
Subject: Backup generator and one of three pumps to dewater the field.		

NMED/SWQB

Official Photograph Log
Photo # 2

Photographer: Sarah Holcomb	Date: 7-2-2013	Time: 1043 hours
City/County: Mora, Mora County		
Location: Mora Independent School District, High School Athletic Field		
Subject: Close up view of pump system. The same system is replicated three times for this facility. The pump controller starts pumping groundwater when it reaches a depth of 21 feet from the surface.		

NMED/SWQB

Official Photograph Log
Photo # 3

Photographer: Sarah Holcomb	Date: 7-2-2013	Time: 1049 hours
City/County: Mora, Mora County		
Location: Mora Independent School District, High School Athletic Field		
Subject: Outfall to the Mora River, which was dry at the time of this inspection.