



Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT

Inspection Date(s):	9/13/2018		
Media:	Water		
Regulatory Program(s)	CWA – NPDES		
Company Name:	Mora Independent School District		
Facility Name:	Mora High School – Athletic Field Project		
Facility Physical Location:	Highway 518 and Ranger Drive		
(city, state, zip code)	Mora, NM 87732		
Mailing address:	P.O. Box 179		
(city, state, zip code)	Mora, NM 87732		
County/Parish:	Mora County		
Facility Contact:	Ella Arellano	Superintendent	
	earellano@mora.k12.nm.us		
FRS Number:	110064609927		
Identification/Permit Number:	NM0031097		
Media Number:			
NAICS:			
SIC:	8211		
Personnel participating in inspection:			
Amy Andrews, P.E.	USEPA/6EN-WMH	Environmental Engineer	214-907-0638
Eugene Abeyta	Mora Independent School District	Facilities Maintenance and Transportation Supervisor	575-387-3108
Beverly Montoya	Mora Independent School District	Special Projects Coordinator	575-387-3146
EPA Lead Inspector Signature/Date			
	Amy Andrews		Date
Supervisor Signature/Date			
	Carol Peters		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Environmental Protection Agency (EPA) Region 6 inspector Amy Andrews arrived at the Mora Independent School District / Mora High School Athletic Field Project at 9:00 AM on September 13, 2018 for an unannounced inspection. I met with Mr. Eugene Abeyta, the Facilities Maintenance and Transportation Coordinator, and Ms. Beverly Montoya. I presented my credentials to Mr. Abeyta and Ms. Montoya and informed them that this was an EPA inspection to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act (CWA). The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA. This report is based on information supplied by Mora Independent School District representatives (the permittee), observations made by the EPA inspector, and records and reports maintained by the permittee and the EPA.

FACILITY DESCRIPTION

The Mora Independent School District Athletic Field Project is classified as a minor industrial discharger with an intermittent design flow (the system is only used when the ground water table is high) which would 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, primary contact, and public water supply.

Section II - OBSERVATIONS

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, the Athletic Field Project was implemented to resolve the standing water issue. Three groundwater extraction wells were installed around the athletic field to remove water from the subsurface when the groundwater reached a depth of 21 feet below ground level. Each of the wells contains an inline flow meter. After the water is pumped out of the wells it goes to one of two unlined reservoirs (with an unknown capacity) prior to being discharged to the river.

Section III – AREAS OF CONCERN

Requirement 1

NPDES Permit NM0031097, Part I: A.1. Final Effluent Limits – Intermittent Flow: *Flow is to be reported in million gallons per day (MGD) with a measurement frequency of daily.*

NPDES Permit NM0031097, Part III: C.6. Flow Measurements: *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.

Concern 1

There is no flow meter on the discharge amount that flows through Outfall 001. Although each individual flow meter on each of the groundwater extraction wells qualifies as an appropriate flow measurement device in accordance with the above requirement, the summation of the flows recorded by the three well flow meters is not equal to the amount of water that is actually discharged to the Mora River, due to the presence of the reservoirs located between the wells and the discharge. Total flow amounts are recorded once a month from the groundwater wells. The original NPDES permit was issued September 2012, and the permittee has not reported on their DMRs that they have ever had a discharge (there are, however, a significant number of DMRs that were not received). Flow pumped out of the groundwater wells between 7/5/2017 and 8/4/2017 was recorded at 49,000 gallons total, however the permittee reported "NODI-4" on their DMRs, which stands for "no discharge, Discharge to Lagoon/Groundwater." Permittee verbally stated that the water was pumped out of the wells and into the reservoirs, but a once per day visual check confirmed that no water was discharged to the river out of Outfall 001. Flow pumped out of the groundwater wells between 8/4/2017 and 9/6/2017 was recorded at 19,000 gallons, and "NODI-C" was reported on the DMRs, which would mean that there was no discharge at all.

Requirement 2

NPDES Permit NM0031097, Part I: C. Monitoring and reporting (Minor Dischargers): *All DMRs shall be electronically reported ... 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 no later than the 28th day of the month following each reporting period.*

NPDES Permit NM0031097, Part III: A.2. Duty to Comply: *The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and its grounds for enforcement action; for permit termination; revocation and reissuance, or modification; or for denial of a permittee renewal application.*

Concern 2

DMRs were not received for the periods between September 2012 and December 2013 or October 2014 and October 2016. Even though the reporting period is over, the permittee needs to go back and report overdue data.

Requirement 3

NPDES Permit NM0031097, Part I: A.1. Final Effluent Limitations: *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 groundwater to the Mora River, in Segment Number*

20.6.4.309, from Outfall 001. Such discharges shall be limited and monitored by the permittee as specified below:

POLLUTANT	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	6.6 s.u.	8.8 s.u.	Once/Month (*1)	Grab

POLLUTANT (*2)	30-DAY AVG	DAILY MAX	30-DAY AVG	DAILY MAX	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	Report MGD	Report MGD	***	***	Daily (*1)	Measure
TSS	318 lbs/day	Report	8.83 mg/l	Report	Once/Month (*1)	Grab
TDS	12,970 lbs/day	Report	360 mg/l	Report	Once/Month (*1)	Grab

Whole Effluent Toxicity Testing (7-Day Chronic NOEC Freshwater) (*1,*3)	30-DAY AVG MINIMUM	7-DAY MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
<i>Ceriodaphnia dubia</i>	Report	Report	Once (*4, *5)	24-Hour Composite
<i>Pimephales promelas</i>	Report	Report	Once (*4, *5)	24-Hour Composite

Footnotes:

- *1 When discharging.
- *2 See Appendix A of Part II of the permit for the required Minimum Quantification Level.
- *3 Monitoring and reporting requirements begin on the effective date of this permit. See Part II, Whole Effluent Toxicity Testing Requirements for additional WET monitoring and reporting conditions.
- *4 Once per permit term. This permit does not establish requirements to automatically increase the WET testing frequency after a test failure, or to begin a toxicity reduction evaluation (TRE) in the event of multiple test failures. However, upon failure of any WET test, the permittee must report the test results to EPA and NMED, Surface Water Quality Bureau, in writing, within 5-business days of notification the test failure. EPA and NMED will review the test results and determine the appropriate action necessary, if any. (See Part II, Section D).
- *5 The test is to be conducted within the first 12-months after the permit effective date between November 1 and April 30.

Concern 3

The permittee has Limitations and Monitoring Requirements in the permit. The permittee is not prepared to take samples or have analyses done. There is no alarm on either the discharge point or the well pumps to warn the permittee that a discharge will or has occurred, and the only way to know if discharge to the river has occurred is for someone to be physically standing by the outfall when it happens. If a discharge does occur, the permittee is responsible for monitoring the discharge. It is necessary for the permittee to find a laboratory, contract the laboratory, and prepare for any discharge that may occur. This is a repeat finding from previous inspection reports dated 7/2/2013, 3/6/2014, and 4/27/2016 conducted by the New Mexico State Environment Department (NMED), on the behalf of the EPA.

Section IV – FOLLOW UP

No information was received by EPA after exiting the Facility on 9/13/2018.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 3 photos taken 9/13/2018.

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Mora Independent School District – Athletic Field Project		
City: Mora	County/Parish: Mora County	State: New Mexico



Photo File Name: DSCN0665.JPG

Date of Photo: 9/13/2018

Time of Photo: 9:39 AM

Photographer: Amy Andrews

Description: Groundwater extraction well, with pump and flow meter, located at the Athletic Field.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Mora Independent School District – Athletic Field Project		
City: Mora	County/Parish: Mora County	State: New Mexico



Photo File Name: DSCN0668.JPG

Date of Photo: 9/13/2018

Time of Photo: 9:41 AM

Photographer: Amy Andrews

Description: Unlined reservoir where the groundwater is stored prior to being discharged to the river through Outfall 001.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Mora Independent School District – Athletic Field Project		
City: Mora	County/Parish: Mora County	State: New Mexico



Photo File Name: DSCN0669.JPG

Date of Photo: 9/13/2018

Time of Photo: 9:47 AM

Photographer: Amy Andrews

Description: Outfall 001, which discharges to the Mora River.