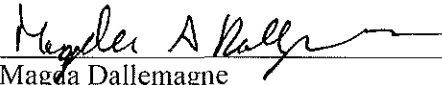
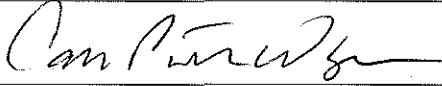


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	October 19, 2017		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	Jemez Valley Public School		
Facility Name:	Jemez Valley Public School Wastewater Treatment Plant		
Facility Physical Location:	8501 Highway 4		
(city, state, zip code)	Jemez Pueblo, NM 87024		
Mailing address:	8501 Highway 4		
(city, state, zip code)	Jemez Pueblo, NM 87024		
County/Parish:	Sandoval County		
Facility Contact:	Barbara Perry	Administrative Assistant to the Superintendent	
	bperry@jvps.org		
FRS Number:	110011027432		
Identification/Permit Number:	NM0028479		
Media Number:	none		
NAICS:	221320		
SIC:	4952		
Personnel participating in inspection:			
Magda Dallemagne	US EPA, 6EN-WS	Inspector	(214) 665-7396
David Esparza	US EPA, 6EN-WM	Inspector	(505) 366-8402
Barbara Perry	Facility Representative	Administrative Assistant to the Superintendent	(575) 834-7394
Louis A. Gachupin	Facility Representative	Maintenance Wastewater Operator	(505) 269-1049
Susan Wilkinson Davis	Facility Representative	Superintendent	(575) 834-7391
EPA Lead Inspector Signature/Date	 Magda Dallemagne		2-6-18 Date
Supervisor Signature/Date	 for Robert Houston		2/6/18 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Magda Dallemagne and David Esparza arrived at the Jemez Valley Public School Administrative Office (JVPS) at 9:30am on October 19, 2017, for an unannounced inspection of the Wastewater Treatment Plant (WWTP). We met with Barbara Perry, the Administrative Assistant to the Superintendent, and Louis A Gachupin, Maintenance Water and Wastewater Operator, at the Opening Conference. The inspectors, along with EPA inspector Amy Andrews, had entered the facility on October 17, 2017, as a brief overview as time permitted following another inspection in the area. Inspectors Dallemagne and Esparza returned to do an inspection October 19, 2017, as time permitted. On both occasions, I presented my credentials to Mrs. Perry and informed her that this was an EPA inspection to determine compliance with the facility's National Pollution Discharge Elimination System (NPDES) permit, NM0028479. The scope of the inspection is to evaluate the compliance of the facility's laboratory and sampling with its NPDES operating permit.

FACILITY DESCRIPTION

The JVPS WWTP laboratory is not accredited under National or Private programs. There is one employee who is responsible for maintaining the WWTP as well as sampling and testing, a second employee is undergoing the process of attaining certifications to provide assistance. The laboratory performs only pH and chlorine testing under their NPDES operating permit, the remaining required testing is sampled on site and sent to a contract laboratory, Hall Environmental, to satisfy the permit requirements.

Section II - OBSERVATIONS

The inspectors discussed the operations and management of the laboratory and observed as the technician walked them through the processes for testing and sampling per the NPDES permit.

The following observations were made.

1. All standard operating procedures (SOPs) covering testing and sampling are understood and are not written. The SOPs therefore do not reference the EPA or Standard Methods and are not regularly updated.
2. The data recorded daily was written on a generic monthly calendar, not a bench sheet. The data was not recoded under identifying titles or comments, just numbers written in a specific pattern the operator understood for recordkeeping. The calendar did not reference the correct EPA method used for testing and was not decipherable to the inspectors without clear instructions on how to interpret the numbers.
3. The data showed an unusual consistency in the daily flow rate. It is unusual for the flow rate to be exactly the same every day, even on occasions of heavy rain, according historical weather reports. During the inspection, the operator reported operations run

roughly 400 gallons a day with a school population of roughly 350 students and 90 staff members. The average person uses 35 gallons a day at work or school, meaning the expected flow rate for the student population alone would be 12, 250 gallons per day.

4. The facility does not have an internal training program in place, and has no methods devised to track internal training
5. The laboratory's ambient temperature is not adequately controlled for the storage of pH buffer solutions used in the calibration of pH probes.
6. The pH probe is not calibrated at every use, and is instead calibrated weekly.
7. The reagents were not properly labeled with the open and expiration dates. The expiration dates used did not meet the general one year after opening, or per manufacturer's expiration, rule. The pH buffer reagents were expired.

Section III – AREAS OF CONCERN

At the conclusion of the inspection, the EPA inspectors met with the representatives from JVPS for an exit interview at 2:15 pm October 19, 2017. At that time, the inspectors provided details of the inspection and reviewed areas of concern noted in the inspection that will require additional follow-up or correction. These areas of concern included:

1. Maintenance of SOPs and bench sheets
2. Regular calibration of instrumentation
3. Storage and handling of reagents
4. Internal training and tracking

Section IV – FOLLOW UP

Documents requested at time of inspection were received January 9, 2018, after exiting the facility on October 17, 2017. Additional information was received January 22, 2018. A copy of this report will be provided to the facility.

