



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN  
Cabinet Secretary

BUTCH TONGATE  
Deputy Secretary

### Certified Mail - Return Receipt Requested

September 22, 2014

Mr. Ruben Salcido  
Operation Mgr. & Environmental Coordinator  
Water / Wastewater Utilities Division  
City of Farmington  
800 Municipal Road  
Farmington, NM 87401

Re: Major Municipal; SIC 4952; Compliance Evaluation Inspection; Farmington Wastewater Treatment Plant; NPDES Permit No. NM0020583; August 13, 2014

Enclosed please find a copy of the report and check list 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.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas  
US Environmental Protection Agency, Region VI  
Enforcement Branch (6EN-WM)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

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

City of Farmington  
September 22, 2014  
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If you have any questions about this inspection report, please contact Barbara Cooney at (505) 827-0212 or at [barbara.cooney@state.nm.us](mailto:barbara.cooney@state.nm.us).

Sincerely,  
*/S/ Bruce J. Yurdin*

Bruce J. Yurdin  
Program Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Raquel Douglas, USEPA (6EN-WM) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN) by e-mail  
NMED District II, 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	2	0	5	8	3	11	12	1	4	0	8	1	3	17	18 C	19 S	20 1
Remarks																						
F A R M I N G T O N W W T P																						
Inspection Work Days			Facility Evaluation Rating					BI	QA	Reserved												
67			1	69	70	3	71	N	72	N	73		74	75	M	A	J	O	R			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) Farmington WWTP NPDES # NM0020583--- 1395 South Lake Street; Farmington, NM 87401-2663 (go south on lake street, past the Hospital, make a jog to the east and past Murry Street turn south to gate of plant) San Juan County, New Mexico	Entry Time /Date 10:00 Hours / 13 August 2014	Permit Effective Date November 1, 2010
	Exit Time/Date 17:00 Hours / 13 August 2014	Permit Expiration Date October 31, 2015
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Dean Roquemore - OMI., Operation Manager 505-215-7027 Mr. Ron Rosin - OMI, Area Manager 505-326-1918 Ms. Monica Peterson -OMI, Laboratory Manager 505-325-6953 Mr. Ruben Salcido, City of Farmington Water/Waste Division O&M Manager 505-599-1284	Other Facility Data SIC Code: 4952 Coordinates in Decimal Degree For: Latitude: North 36.71719 Longitude: West108.22217	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Ruben Salcido, City of Farmington Water/Waste Division, O&M Manager 800 Municipal Drive ; Farmington, NM 87401-2663	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	M	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
U	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

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

See "Further Explanations" section for details.

Name(s) and Signature(s) of Inspector(s) /S/ Barbara Cooney	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212 /Fax 505-827-0160	Date Sept 22, 2014
Signature of Management or QA Reviewer /S/ Bruce J. Yurdin	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2819 / Fax 505-827-0160	Date 09/22/2014

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 NO)

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: The Unacceptable Rating is based on the continuing problem of Sanitary Sewer Overflows and the absence of any treatment process to reduce TDS.

1. TREATMENT UNITS PROPERLY OPERATED. Continuing problem with sanitary sewer overflows.  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. - No treatment process for the removal of TDS.  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 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 NO)

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: The Unacceptable Rating is based on the continuing problem of Sanitary Sewer Overflows and the absence of any treatment process to reduce TDS.

1. TREATMENT UNITS PROPERLY OPERATED. Continuing problem with sanitary sewer overflows.  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. - No treatment process for the removal of TDS.  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? Reports submitted w/DMR  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 NO ).  
 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.  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. (DATE OF LAST CALIBRATION within last year )  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

**SECTION F - LABORATORY (CONT'D)**2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED  Y  N  NA3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  S  M  U  NA4. QUALITY CONTROL PROCEDURES ADEQUATE.  S  M  U  NA5. DUPLICATE SAMPLES ARE ANALYZED. At least 10 % OF THE TIME.  Y  N  NA6. SPIKED SAMPLES ARE ANALYZED. \_\_\_ % OF THE TIME.  Y  N  NA7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Bio Aquatics  
 LAB ADDRESS Carrollton, TX  
 PARAMETERS PERFORMED Bio Monitoring

**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
01	no	no	no	no	no	Slightly green	

RECEIVING WATER OBSERVATIONS Effluent Exceedences for TDS and TSS and E.coli

**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  NA2. 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  NA2. TYPE OF SAMPLE OBTAINED  
GRAB \_\_\_\_\_ COMPOSITE SAMPLE \_\_\_ METHOD \_\_\_\_\_ FREQUENCY \_\_\_\_\_3. SAMPLES PRESERVED.  Y  N  NA4. FLOW PROPORTIONED SAMPLES OBTAINED.  Y  N  NA5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.  Y  N  NA6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.  Y  N  NA7. SAMPLE SPLIT WITH PERMITTEE.  Y  N  NA8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.  Y  N  NA9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.  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? Reports submitted w/DMR  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 NO ).  
 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.  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. (DATE OF LAST CALIBRATION within last year )  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



**SECTION F - LABORATORY (CONT'D)**2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED  Y  N  NA3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  S  M  U  NA4. QUALITY CONTROL PROCEDURES ADEQUATE.  S  M  U  NA5. DUPLICATE SAMPLES ARE ANALYZED. At least 10 % OF THE TIME.  Y  N  NA6. SPIKED SAMPLES ARE ANALYZED. \_\_\_ % OF THE TIME.  Y  N  NA7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Bio Aquatics  
 LAB ADDRESS Carrollton, TX  
 PARAMETERS PERFORMED Bio Monitoring

**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
01	no	no	no	no	no	Slightly green	

RECEIVING WATER OBSERVATIONS Effluent Exceedences for TDS and TSS and E.coli

**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  NA2. 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  NA4. FLOW PROPORTIONED SAMPLES OBTAINED.  Y  N  NA5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.  Y  N  NA6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.  Y  N  NA7. SAMPLE SPLIT WITH PERMITTEE.  Y  N  NA8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.  Y  N  NA9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.  Y  N  NA

## **INTRODUCTION**

A Compliance Evaluation Inspection (CEI) was conducted at the City of Farmington Waste Water Treatment Plant (WWTP) by Ms. Barbara Cooney of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) on 13 August 2014. The inspection was conducted by NMED for the U. S. Environmental Protection Agency (USEPA), Region 6, under the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the Federal Clean Water Act. These inspections are conducted under agreement with USEPA and are used by the USEPA to determine compliance with the NPDES permit program.

This facility is a major municipal waste water treatment plant (WWTP) under the Federal Clean Water Act (CWA), section 402 National Pollutant Discharge Elimination system (NPDES) permit program and is assigned NPDES permit number NM0020583. The Standard Industrial Classification Code (SIC) is 4952. The facility has a design flow of 6.67 Million Gallons per Day (MGD) and discharges into the San Juan River in water quality segment 20.6.4.401 of the San Juan River Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*). The designated uses for the segment are public and industrial water supply, irrigation, livestock watering, wildlife habitat, primary contact, marginal coldwater aquatic life and warmwater aquatic life.

## **INSPECTION DETAILS**

The inspector arrived at the Farmington WWTP at 10:00 hours on 13 August 2014. The inspector showed her credentials and discussed the purpose of the inspection with Monica Peterson, Analytical Laboratory Manager for CH2MHill and with Mr. Dean Roquemore, also of CH2MHill who accompanied the inspector throughout the facilities. CH2MHill is the contact operator of the WWTP for the City of Farmington. Two sites in the collection system where sanitary sewer overflows have occurred were inspected. The laboratory was also inspected and accompanied by Monica Peterson and other laboratory personnel. Records were provided to the inspector for review. Following the inspection of the facility an exit interview was conducted with: Ron Rosin, CH2MHill Area Manager, Dean Roquemore, Monica Peterson, and Ruben Salcido, City of Farmington Water/Wastewater Utilities Division O&M Manager. The inspector left the facility at approximately 17:00 hours.

## **TREATMENT SCHEME**

The influent enters the WWTP through a collection system that is largely gravity flow and supplemented with a network of fifteen lift stations where necessary. A lift station is located directly preceding the headworks of the treatment plant. The headworks consist of grinder air scrubber, and aerated grit chamber. The solids removed are conveyed to a hopper and sent to the landfill after passing the paint filter test. Septage is received before the headworks and is sent directly to the anaerobic digesters. Decant from the digesters is sent back to the headworks and mixed with the raw influent.

The wastewater then flows to one of two primary clarifiers known as A & B. From the primary clarifiers the decant is sent to either the trickling filters (25% to each of two trickling filters) or to the Medium Rte Activated Sludge (MRAS) treatment unit (50% of the total flow). The MRAS is a modified aerated race track design that came on line in 2004. The unit has both aerobic treatment and an anoxic zone. The Dissolved Oxygen in the aerated sections is 2.5 to 3.0 mg/L. The flow from the trickling filter is mixed with that from the MRAS and sent to the final or secondary clarifiers. Gravity flow carries the treated wastewater to the chlorine contact chamber for disinfection, followed by dechlorination with sodium hypochlorite. The chlorine dosing as well as the dechlorination dosages are now distributed by an automated system. A radio signal sends the flow rates to the dosing unit for flow proportioning. The treated water then passes through the Parshall flume for effluent flow measurement, then is discharged to the San Juan River.

## **SLUDGE**

The solids from the primary clarifiers and the MRAS are wasted to the anaerobic digester. The solids from the secondary clarifiers are sent back as Return Activated Sludge (RAS) to the head of the treatment plant. Digested solids are passed through a mobile belt press to aid in dewatering before they are sent to the drying beds. Final surface disposal for the solids is at the San Juan County Regional Landfill.

## **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 A – Permit Verification – Overall Rating “Satisfactory”**

### **Section B – Record Keeping and Reporting – Overall Rating “Satisfactory”**

### **Section C - Operation and Maintenance – Overall Rating “Marginal”**

#### **Permit Requirements for Operation and Maintenance**

The permit requires on page 2 of Part III. 3. Proper Operations and Maintenance:

- 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 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.*

#### **Findings for Operation and Maintenance**

1. Two sites were inspected that had sanitary sewer overflows.

(a) Kiwanis Park – Sewer overflow 8 June 2014. The overflow was reported by Mr. Deane Roquemore.

Time of Overflow: 2300 hours

Duration: 30 minutes at 20 gallons per minute

Estimated volume: 600 gallons

Location: 3540 East 30<sup>th</sup> St., Kiwanis Park

Cause: Main sewer line had rags in it. Sewer line got plugged at manhole.

Action Taken: Rodded main line and unplugged. Raked up toilet paper and put lime on spill area. At the time of this inspection the area was clean and clear of any debris. A storm drain is located downhill from the overflow and some amount of raw sewage did enter the storm drain that flows to the San Juan River. It is unknown how much may have reached the river.

(b) The Farmington Country Club, a privately owned and operated community has a lift station inside the development gates. There have been complaints from residents in the area in past years that sewer overflows occurred frequently at the lift station. At the time of this inspection, the area was clear of sewage debris and the lift station appeared to be functioning properly. According to City of Farmington representatives, the causes for this lift station failures are large volumes of adult diapers, rags and towels.

2. The City of Farmington and other communities in the Four Corners area are developing regional wide plans for wastewater management. Within the last few years the town of Kirkland and the community of Magee Park have come on line to the collection system and the wastewater is now being processed through the Farmington WWTP. The WWTP is currently operating at 83% to 84% of it's total capacity of 6.67MGD. As the plant takes on more of the wastewater from surrounding communities it is necessary for the permittee to continue to notify EPA and NMED of the changes. If there is a point when the permittee intends to increase the design capacity of the WWTP it will be necessary through the NPDES

permit process to undergo an Antidegradation review as found in the State of New Mexico Standards for Interstate and Intrastate Surface Waters 20.6.4 NMAC.

3. The secondary clarifier following the MRAS treatment system had an excessive amount of algae growth in the basin and clogging the weirs. According to facility representatives, the regular weekly scheduled cleaning of the weirs was not done because an operator was out that day. The unit was scheduled to be cleaned later that week.

4. The aerators in the MRAS race track are fixed in location and run full time. The anoxic zone is approximately 20 feet wide and makes up an estimated 10% of basin treatment. This limited ability for operators to adjust the size of the anoxic zone reduces some of the potential for denitrification from the unit.

5. The City of Farmington has worked on an educational program and with sewer system contributors throughout the city to reduce Total Dissolved Solids (TDS). However no treatment modifications were observed at the WWTP. The TDS program is being addressed largely through the Pretreatment Program. This inspection did not include a Pretreatment Survey.

**Section D - Self Monitoring - Overall Rating "Satisfactory"**

**Section F - Laboratory - Overall Rating "Satisfactory"**

**Section G Effluent and Receiving Water - Overall Rating "Unsatisfactory"**

**Permit Requirements for Effluent/Receiving Waters**

The permit requires in Part I. A. Effluent Limitations and Monitoring Requirements:

Parameter	Quantity Loading Lbs/day			Quality Concentration Mg/L (unless otherwise specified)			Frequency	Sample Type
	30 day avg	7day avg	Daily Max	30 day avg	7day avg	Daily max		
pH					Minimum 6.6 s.u.	Maximum 9.0 s.u.	5/week	Grab
Flow	Report	Report						
BOD	1,669	2,504		30	45			12 hr composite
TSS	1,669	2,504		30	45			12 hr composite
E.coli Bacteria	31.9*		31.9*	126 cfu		410 cfu	5/week	grab
Total Residual Chlorine						19 µg/L	Daily	grab
TDS						<400mg/L inc	1/week	12 hr composite

\* Billion (1.0 × 10<sup>9</sup>) cfu/day. Loading limit calculated as follows: [Flow in MGD × cfu /100 ml in effluent × 3.79 × 10<sup>7</sup>] / 1.0 × 10<sup>9</sup>.

**Finding for Effluent / Receiving Waters**

From the time of the last inspection conducted by NMED at this facility there have been effluent exceedences for E. coli Bacteria, Total Dissolved Solids (TDS) and Total Suspended Solids (TSS).

**Effluent Exceedences: From July 2014 to September 19, 2014**

Administrative Order Docket Number: CWA-06-2014-1834 has identified exceedence for the time period of February 29, 2012 through June 30, 2014. Any exceedences listed in the Administrative Order are not included in this report.

<b>Date</b>	<b>Parameter</b>	<b>Effluent Exceedence</b>
September 17, 2014	<i>E. coli Daily Max</i>	920.8 MPN/100ml
August 25, 2014	<i>E-coli Daily Max</i>	1,013 MPN/100 mL
August 21, 2014	<i>E-coli Daily Max</i>	2,419.6 MPN/100 mL

**Section H - Sludge Disposal - Overall Rating "Satisfactory"**

NMED/SWQB  
Official Photograph Log  
Photo # 1 and 2

Photographer: B. Cooney

Date: 13 August 2014

Time: 10:35 / 10:36 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Kiwanis Park

Subject: Sewer Overflow 8 June 2014 area has been cleaned, disinfected and is free of debris.



NMED/SWQB  
Official Photograph Log  
Photo # 3 and 4

Photographer: B. Cooney

Date: 13 August 2014

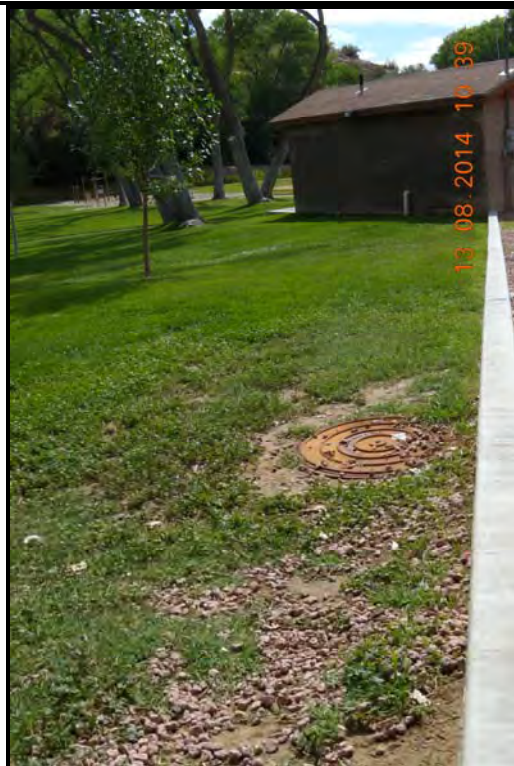
Time: 10:39 10:38 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Kiwanis Park

Subject: Sewer Overflow 8 June 2014 area has been cleaned, disinfected and is free of debris.



NMED/SWQB  
Official Photograph Log  
Photo #5

Photographer: B. Cooney

Date: 13 August 2014

Time: 10:35 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Kiwanis Park

Subject: Storm water drain that flows to the San Juan River. A sewer overflow 8 June 2014. The sewer overflow did reach the storm drain and possible to the River. At the time of the inspection the area was clean and clear of debris.



NMED/SWQB  
Official Photograph Log  
Photo #6

Photographer: B. Cooney

Date: 13 August 2014

Time: 10:54 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Country Club

Subject: The Farmington Country Club, a privately owned and operated community has a lift station inside the development gates. There have been complaints from residents in the area in past years that sewer overflows occurred frequently at the lift station. At the time of this inspection, the area was clear of sewage debris and the lift station appeared to be functioning properly.



NMED/SWQB  
Official Photograph Log  
Photo # 7

Photographer: B. Cooney

Date: 13 August 2014

Time: 11:00 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Country Club

Subject: The Farmington Country Club, a privately owned and operated community has a lift station inside the development gates. There have been complaints from residents in the area in past years that sewer overflows occurred frequently at the lift station. At the time of this inspection, the area was clear of sewage debris and the lift station appeared to be functioning properly.



NMED/SWQB  
Official Photograph Log  
Photo # 8

Photographer: B. Cooney

Date: 13 August 2014

Time: 10:56 Hours

City/County: Farmington / San Juan

State: New Mexico

Location:

Subject: Farmington Country Club Wet Well





NMED/SWQB  
Official Photograph Log  
Photo # 9

Photographer: B. Cooney

Date: 13 August 2014

Time: 10:55 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Country Club

Subject: The Farmington Country Club, a privately owned and operated community has a lift station inside the development gates. There have been complaints from residents in the area in past years that sewer overflows occurred frequently at the lift station. At the time of this inspection, the area was clear of sewage debris and the lift station appeared to be functioning properly.



NMED/SWQB  
Official Photograph Log  
Photo # 10

Photographer: B. Cooney

Date: 13 August 2014

Time: 12:43 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Sludge Digester



NMED/SWQB  
Official Photograph Log  
Photo # 11

Photographer: B. Cooney

Date: 13 August 2014

Time: 12:44 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Covered trickling filter in the distance. The treatment plant was bermed and contained any run off on site.



NMED/SWQB  
Official Photograph Log  
Photo # 12

Photographer: B. Cooney

Date: 13 August 2014

Time: 12:44 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Headworks air scrubber.



NMED/SWQB  
Official Photograph Log  
Photo # 13

Photographer: B. Cooney

Date: 13 August 2014

Time: 12:45 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Headworks biological and water suspended media air scrubber is scheduled for replacement in the next year.



NMED/SWQB  
Official Photograph Log  
Photo # 14

Photographer: B. Cooney

Date: 13 August 2014

Time: 12:47 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Headworks parallel enclosed bar screens. The influent is split evenly through these units.



NMED/SWQB  
Official Photograph Log  
Photo # 15

Photographer: B. Cooney

Date: 13 August 2014

Time: 12:51 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Septage Receiving Station is bermed so there is no run off from the site. It is attended by an operator during business hours.



NMED/SWQB  
Official Photograph Log  
Photo # 16

Photographer: B. Cooney

Date: 13 August 2014

Time: 12:59 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Primary Clarifier weirs were level and short circuiting was not observed.



NMED/SWQB  
Official Photograph Log  
Photo # 17

Photographer: B. Cooney

Date: 13 August 2014

Time: 13:07 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Medium Rate Activated Sludge (MRAS) system.



NMED/SWQB  
Official Photograph Log  
Photo # 18

Photographer: B. Cooney

Date: 13 August 2014

Time: 13:11 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Medium Rate Activated Sludge (MRAS) system. The anoxic zone is only approximately 20 feet wide under the bridge, limiting the effectiveness of Nitrogen removal.



NMED/SWQB  
Official Photograph Log  
Photo # 19

Photographer: B. Cooney

Date: 13 August 2014

Time: 13:43 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Secondary Clarifier for the MRAS system had excessive amounts of algae in the weirs.



NMED/SWQB  
Official Photograph Log  
Photo # 20

Photographer: B. Cooney

Date: 13 August 2014

Time: 13:02 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: The sludge belt press is in operation daily, as solids are wasted from the digester.



NMED/SWQB  
Official Photograph Log  
Photo # 21

Photographer: B. Cooney

Date: 13 August 2014

Time: 13:57 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Sludge Drying Beds. Solids are disposed of at the County Landfill and at the Landfill in Bondad, Colorado.



NMED/SWQB  
Official Photograph Log  
Photo # 22

Photographer: B. Cooney

Date: 13 August 2014

Time: 14:00 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Chlorine contact chambers are cover with cloth tarps to prevent excessive algae growth in the basins.



NMED/SWQB  
Official Photograph Log  
Photo # 23

Photographer: B. Cooney

Date: 13 August 2014

Time: 14:05 Hours

City/County: Farmington / San Juan

State: New Mexico

Location: Farmington Wastewater Treatment Plant

Subject: Effluent from the WWTP is sent to the San Juan River.





Attachments  
Comments from Permittee

**CITY OF FARMINGTON**800 Municipal Drive  
Farmington, NM 87401-2663

Phone: (505) 599-1308

Fax: (505) 599-1299

www.fmtn.org

October 22, 2014

Certified Mail – Return Receipt Requested

Mr. Bruce Yurdin  
New Mexico Environment Department  
Surface Water Quality Bureau  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, NM 87502

Re: Major Municipal; SIC 4952; Compliance Evaluation Inspection; Farmington Wastewater Treatment Plant; NPDES Permit No. NM0020583; August 13, 2014

Dear Mr. Yurdin,

This letter is The City of Farmington's response to the Compliance Evaluation Inspection report dated September 22, 2014 for the inspection performed at the Farmington Wastewater Treatment Plant on August 13, 2014 by Ms. Barbara Cooney of the New Mexico Environment Department.

**Regarding the NPDES Compliance Inspection Report, EPA Checklist:**

- Section C – Operations and Maintenance - Item 1: *Treatment Units Properly Operated.* Ms. Cooney assigned a Marginal rating based upon "*continuing problem with sanitary sewer overflows.*"

The City of Farmington has committed more than \$3,100,000 over the past 3 years in an effort to minimize the potential of sanitary sewer overflows (SSOs). This has proved successful in significantly reducing the number of SSOs caused by pump failures and malfunctioning alarms at lift stations within the Farmington collection system. As noted in the report, the SSO which occurred at a manhole in Kiwanis Park was caused by rags and debris in the line downstream. Clogging of lines due to the presence of rags is preventable by jet-rodding the sewer lines. The City of Farmington has an aggressive jet-rodding program. However, excessive rag accumulations may certainly occur between scheduled cleanings in any section of the system.

The report also states that the "*raw sewage did enter the storm drain that flows to the San Juan River.*" The sewage did not flow towards the storm drain, but followed the terrain and flowed towards the volleyball court.

The San Juan Country Club facility is not owned or operated by the City of Farmington. The home owner's association is responsible for the operation of this facility and any upgrades which may be necessary to prevent SSOs.

Further, SSOs should not factor into the evaluation of the Treatment Facility. SSOs in the collection system should be addressed distinctly from the Treatment Facility.

Given the above, it is respectfully requested that the Inspection Report be amended to a Satisfactory rating for Item 1.

- Section C – Operations and Maintenance - Item 5: *All needed treatment units in service* was rated as unsatisfactory with the explanation “No treatment Process for the removal of TDS”.

All needed treatment units available at the facility were operational at the time of the inspection. The City’s WWTP is not designed to remove TDS.

The U.S. Environmental Protection Agency’s (EPA) Region 6 Office has issued an Administrative Order (AO) to the City of Farmington to deal with the TDS limit in the NPDES Permit. The City is in full compliance with the agreed-upon activities in the AO that have been identified as steps that are to be taken to reduce the TDS concentration in the effluent of the WWTP. Additionally, the City has submitted studies to EPA regarding the costs of upgrades to the WWTP or Water Treatment Facilities which would be required to reduce TDS concentrations in the Farmington system.

The AO represents an enforcement agreement with the primacy agency, the Environmental Protection Agency. As such, it is not appropriate for the Inspection Report to cite “No treatment process for the removal of TDS” given that such a finding carries potential enforcement implications on the part of NMED. It is therefore respectfully requested that the Inspection Report be amended to a Satisfactory rating for Item 5.

- Section G – Effluent / Receiving Waters Observations: *Unsatisfactory*. There have been no Total Suspended Solids (TSS) exceedances since the last inspection conducted by NMED in April 22, 2013. It is respectfully requested that the Inspection Report be amended to remove TSS exceedances from the report.

**Regarding the Compliance Evaluation Inspection Report:**

**TREATMENT SCHEME** - Page 1 of 4 of the report contains a number of inaccurate statements. The first paragraph states, “*The influent enters the WWTP through a collection system that is largely gravity flow and supplemented with a network of fifteen lift stations where necessary.*” The City has a total of seventeen lift stations.

“*Septage is received before the headworks and is sent directly to the anaerobic digesters.*” Septage is mixed with the influent flow, goes through the headworks, then gravity flows to the primary clarifiers.

The statement “*The flow from the trickling filter is mixed with that from the MRAS and sent to the final or secondary clarifiers.*” is not accurate. The trickling filter effluent flows into the A-Secondary Clarifier. Flow from the MRAS basin goes into the C-Secondary Clarifier.

It is also stated “*Gravity flow carries the treated wastewater to the chlorine contact chamber for disinfection, followed by dechlorination with sodium hypochlorite.*” The dechlorination chemical used is sodium bisulfite.

It is respectfully requested that the Inspection Report be amended to reflect the corrections cited above.

**SLUDGE** – Page 2 of 4: The statement “*The solids from the secondary clarifiers are sent back as Return Activated Sludge (RAS) to the head of the treatment plant,*” is incorrect. Solids from the A-Secondary Clarifier are pumped to the grit basin which flows into the primary clarifiers. Solids from the C-Secondary Clarifier are pumped to the primary digesters as Waste Activated Sludge (WAS). Also, digested solids are stockpiled after being dewatered by the belt filter press. The drying beds are utilized only in the winter months when the weather prohibits the use of the belt filter press.

It is respectfully requested that the Inspection Report be amended to reflect the corrections cited above.

### **Findings for Operation and Maintenance**

Finding 1. *Two sites were inspected that had sanitary sewer overflows.*  
Please refer to the earlier-referenced comments on this topic

Finding 4. *The aerators in the MRAS race track are fixed in location and run full time. The anoxic zone is approximately 20 feet wide and makes up an estimated 10% of basin treatment. This limited ability for operators to adjust the size of the anoxic zone reduces some of the potential for denitrification from the unit.*

Although this non-aerated zone could technically be considered an anoxic zone, the main purpose is to have an air free zone prior to mixing. Air bubbles would inhibit mixer performance. Because the treatment facility is still partially using the fixed film process, trickling filters, it is important to run the suspended growth in aeration mode only to reduce effluent ammonia in order to reduce the possibility of failing the permit-mandated biomonitoring test due to ammonia toxicity. The current NPDES permit does not have nitrogen limits. The City does have plans in the next phase of expansion to add valving to isolate aeration zones which will enable denitrification to occur should it be required.

Finding 5. “*...no treatment modifications were observed at the WWTP. The TDS program is being addressed largely through the Pretreatment Program.*”

In the earlier discussion about the Administrative Order between the City and EPA Region 6, the EPA has required the City to work towards compliance with the TDS limit via a citizen educational program and through its industrial pretreatment program (IPP). Through IPP mechanisms, two of the permitted industries will be discontinuing their discharges to the collection system by the end of 2014. Just recently, a third permitted industry received its first compliant TDS monitoring result as a result of process and chemical changes.

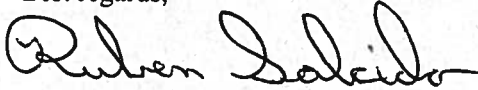
### **Official Photo Log**

Photo 21, Subject, “*Sludge Drying Beds. Solids are disposed at the County Land fill and at the Landfill in Bondad, Colorado.*” All solids are disposed of at the San Juan County Landfill. It is respectfully requested that the log be amended to reflect this correction.

The City of Farmington takes its responsibility to protect our environment very seriously. We continue to work towards compliance with the limits in the NPDES permit through both traditional and non-traditional methods. At this time, operational optimization at the water treatment facilities is being investigated with the goal of enhancing wastewater compliance, specifically with the Total Dissolved Solids limit.

If you have any questions regarding the above comments, please contact me at 505-599-1284 or our Contract Operations Manager, Dean Roquemore at 505-325-7027.

Best regards,



Ruben Salcido  
Operations Manager & Environmental Coordinator,  
Water/Wastewater Utilities, City of Farmington

cc: Gladys Gooden-Jackson, USEPA (6EN)  
David M. Sypher, P. E., Public Works Director, City of Farmington  
Jeffrey J. Smaka, P. E., Water/Wastewater Administrator, City of Farmington  
Bill Zimmerman, HDR  
Ron Rosen, CH2M HILL  
Dean Roquemore, CH2M HILL  
Monica Peterson, CH2M HILL  
File