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## NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

### **Certified Mail - Return Receipt Requested**

September 21, 2015

Mr. Dan Campbell  
General Manager, Raton Water Works  
P.O. Box 99  
Raton, New Mexico 87740

Re: **Raton Wastewater Treatment Plant; Minor Municipal; NPDES Compliance Evaluation; SIC 4952; NPDES Permit NM0020273, August 27, 2015**

Dear Mr. Campbell:

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 USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas  
US Environmental Protection Agency, Region VI  
Enforcement Branch (6EN-WM)  
Fountain Place  
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

Mr. Campbell  
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If you have any questions about this inspection report, please contact Daniel Valenta at (505) 827-2575 or at [daniel.valenta@state.nm.us](mailto:daniel.valenta@state.nm.us).

Sincerely,

*/s/Bruce 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, USEPA (6EN-WM) by e-mail  
Brent Larsen, USEPA (6WQ) by e-mail  
Racquel Douglas, USEPA (6EN-WM) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail  
NMED District II, Robert Italiano by e-mail  
Dan Campbell, WWTP General 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 2 0 2 7 3 11 12 1 5 0 9 2 7 17 18 C 19 S 20 1					
Remarks					
M I N O R W W T P					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 3	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)  <b>RATON WASTEWATER TREATMENT PLANT; COLFAX COUNTY – 1-25 NORTH TO EXIT 450 INTO RATON. CONTINUE, TURNING RIGHT ON HEREFORD RD. DRIVE PAST THE STATE POLICE STATION INTO WWTP.</b>	Entry Time /Date <b>0915/August 27, 2015</b>	Permit Effective Date <b>July 1, 2015</b>
	Exit Time/Date <b>1212/August 27, 2015</b>	Permit Expiration Date <b>June 30, 2020</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  MR. NICK ARAGON, WASTEWATER SUPERINTENDENT (575) 445-2292	Other Facility Data  <b>LAT N. 36° 52'14.02" LONG W. -104° 25'38.81'</b>	
Name, Address of Responsible Official/Title/Phone and Fax Number  MR. DAN CAMPBELL, GENERAL MANAGER (575) 445-3860 P.O. BOX 99, RATON, NM 87740	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <b>SIC 4952</b>	

#### 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
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	M	Laboratory	N	Storm Water	N	Other:

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

1. SEE REPORT AND FURTHER EXPLANATIONS.

Name(s) and Signature(s) of Inspector(s)  Daniel Valenta /s/Daniel Valenta	Agency/Office/Telephone/Fax  NMED/SWQB 505-827-2575	Date  9/16/2015
Signature of Management QA Reviewer  Sarah Holcomb /s/Sarah Holcomb	Agency/Office/Phone and Fax Numbers  NMED/SWQB 505-827-2798	Date  9/21/2015

**SECTION A - PERMIT VERIFICATION**

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS:  S  M  U  NA (FURTHER EXPLANATION ATTACHED *no.*)

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. DETAILS:  S  M  U  NA (FURTHER EXPLANATION ATTACHED *No*)

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. DETAILS:  S  M  U  NA (FURTHER EXPLANATION ATTACHED *No*)

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  N

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?  
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?  
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?

Y  N  NA  
 Y  N  NA  
 Y  N  NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?  
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?

Y  N  NA  
 Y  N  NA

**SECTION D - SELF-MONITORING**

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.  
 DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED No.)

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.  
 DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED No.)

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  
 TYPE OF DEVICE

Y  N  NA

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.

**6" Parshall flume**

Y  N  NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED

**Totalizer Meter**

Y  N  NA

4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION \_\_\_\_\_)  
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.

Y  N  NA  
 Y  N  NA  
 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.  
 DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED YES.)

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	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
4. QUALITY CONTROL PROCEDURES ADEQUATE.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
5. DUPLICATE SAMPLES ARE ANALYZED. <u>0</u> % OF THE TIME. <b>No duplicate samples taken for Nitrogen and Phosphorus.</b>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA
6. SPIKED SAMPLES ARE ANALYZED. <u>0</u> % OF THE TIME.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
7. COMMERCIAL LABORATORY USED.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
LAB NAME <u>Seacrest Group</u>	<b>American Interplex</b>
1341 Cannon St. Louisville, CO 80027-1455	8600 Kanas Rd. Little Rock AR 72204-2322
LAB ADDRESS <u></u>	
PARAMETERS PERFORMED <u>Whole Effluent Toxicity</u>	<b>Nitrogen &amp; Phosphorus</b>

**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
001	NO	NO	NO	NO	NO	CLEAR	

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.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> 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.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA
2. TYPE OF SAMPLE OBTAINED GRAB _____ COMPOSITE SAMPLE _____ METHOD _____ FREQUENCY _____	
3. SAMPLES PRESERVED.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
4. FLOW PROPORTIONED SAMPLES OBTAINED.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
7. SAMPLE SPLIT WITH PERMITTEE.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA

**Raton WWTP**  
**NPDES Permit NM0020273**  
**Compliance Evaluation Inspection**  
**August 27, 2015**

**Introduction**

On August 27, 2015, Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Raton Wastewater Treatment Plant (WWTP). The Raton WWTP has a design flow capacity of 0.9 MGD (million gallons per day) and is classified as a minor 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 NM0020273. This permit regulates the WWTP discharge to Doggett Creek, an unclassified tributary of the Canadian River Basin in Segment 20.6.4.98 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 livestock watering, wildlife habitat, limited aquatic life, 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 WWTP at 0915 hours on August 27, 2015, the inspector conducted an entrance interview with Mr. Dan Campbell, General Manager, and Mr. Nick Aragon, Chief Plant Operator, where he presented credentials and explained the purpose of the inspection. Mr. Campbell conducted a tour of the facility, including the laboratory and records kept onsite. An exit interview was conducted with Mr. Campbell and Mr. Aragon at the facility at approximately 1205 on August 27, 2015 to present the preliminary findings of the inspection.

**Treatment Scheme**

The Raton Wastewater Treatment Plant (WWTP) consists of the headworks including a screw pump/auger and grit removal, SBR basins and UV disinfection, as well as a reuse system to irrigate the city's golf course. For this purpose a splitter box and retention basin are located on site. The effluent is chlorinated in line on the way to the golf course.

Influent enters the headworks through a 9" Parshall flume. Grits, solids, and rags are removed from the influent and collected in a container which is later disposed in a landfill.

The flow then enters a splitter box where it is evenly divided between two basins of the Sequencing Batch Reactor (SBR). These two units run in parallel. The water enters equalization chambers after leaving the splitter box. This gives the operator control of the wastewater levels in the reactor basins. In the first phase, the water fills the reactor chambers. The water entering the chambers mixes with the biomass that has settled from the last treatment phase. Once the chambers are full, in the second phase, air is added to the mixture through fine bubble diffusers to facilitate biological growth and waste reduction/treatment of the wastewater.

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In the third phase, the air is turned off and the treated wastewater is allowed to settle. In the decant phase, the now clarified effluent is discharged from this part of the plant. The total cycle run time can be changed to meet the needs of the facility. The effluent is then sent through a Sunlight Systems UV treatment system. This is an enclosed UV system where the bulbs are fixed and are periodically cleaned with an internal scrubber, which is part of the unit. This system is housed below ground and has been enclosed within a building to protect it from the elements. After disinfection by UV, the water proceeds to the outfall. It is measured by a 6" Parshall flume and totalizer meter.

### **Sludge Management**

Waste sludge from the SBR basins is decanted during the idle phase and is directed to a holding basin on site. This was one of the former aeration basins from the old plant footprint. Sludge is then surface injected at an adjacent plot of land.

### **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 F - Permit Requirements for Laboratory – overall rating of Marginal.**

1. The method used per the worksheet to determine Total Suspended Solids is Standard Methods 20<sup>th</sup> edition page 2-57 method 2540 D.

*“Selection of filter and sample size: Choose sample volume to yield between 2.5 and 200 mg dried residue. If volume fails to meet minimum yield, increase sample volume up to 1 liter. If complete filtration takes more than 10 minutes, increase filter diameter or decrease sample volume.”*

Reviewing the Total Suspended Solids Worksheets it was found the above Standards Methods were not always being applied. In some cases the water sample did not yield the 2.5 to 200 mg dried residue. An increase in sample volume may be needed.

2. The permit requires testing for Total Residual Chlorine (TRC) once a day when chlorine is being used. The chlorine meter in use displays sample measurements in (mg/l). The reporting requirement in the permit is (ug/l). After talking with the operator concerning the chlorine meter and following the process from data sampling to the recording of the data it appears the conversion from (mg/l) to (ug/l) was not completed. The listed MQL for TRC is 33(ug/L). When using this meter any value less than 0.04 (mg) can be recorded as 0.0 on the DMR report.

$$\underline{1(\text{mg}) = 1,000 (\text{ug})}$$

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3. The Permit requires in Part III, Section B.3.a, PROPER OPERATION AND MAINTENANCE: *“Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.”*

The Permit requires in Part III, Section C.5.c, MONITORING PROCEDURES: *“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”*.

Duplicate samples have not been collected and analyzed for Total Phosphorus and Total Nitrogen. An adequate quality assurance-quality control (QA/QC) program should include a minimum of 10% duplicate sample analyses for all parameters.

**NMED/SWQB  
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 8/27/2015	Time: 0947 hours
City/County: Raton / Colfax County		
Location: City of Raton WWTP, 1750 East Hereford Ave. Raton, NM. Facing west.		
Subject: Grits, solids, and rags are removed from the influent and collected in a container.		



**NMED/SWQB  
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 8/27/2015	Time: 1002 hours
City/County: Raton / Colfax County		
Location: City of Raton WWTP, 1750 East Hereford Ave. Raton, NM. Facing east.		
Subject: Waste sludge basin, bubbler aeration basin, and the third basin in the decant phase.		



**NMED/SWQB  
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 8/27/2015	Time: 0900 hours
City/County: Raton / Colfax County		
Location: City of Raton WWTP, 1750 East Hereford Ave. Raton, NM. Facing southeast.		
Subject: Outfall 001 to Doggett Creek.		

