



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lt. Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.env.nm.gov



RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

July 29, 2016

Ms. Maryann Ustick, City Manager
City of Gallup
110 W. Aztec
Gallup, NM 87301

Re: Gallup Wastewater Treatment Plant; Major Municipal; SIC 4952; NPDES Compliance Evaluation Inspection; NM0020672; June 30, 2016

Dear Ms. Ustick:

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

Gallup WWTP
July 29, 2016
Page 2

If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Bruce Yurdin

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

cc: Carol Peters-Wagnon, USEPA (6EN-WM), by e-mail
Racquel Douglas, USEPA (6EN-WM), by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC), by e-mail
Brent Larsen, USEPA (6WQ-PP), by e-mail
Quang Nguyen, USEPA (6WQ-PP), by e-mail
Bill Chavez, NMED District I Manager, by e-mail
Brian Schall, NMED GWQB, by e-mail
Richard Matzke, City of Gallup, by e-mail
Peter Strimple, Severn Trent, by e-mail
Pamela Brotheridge, Severn Trent, by e-mail



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 6 7 2 11 12 1 6 0 6 3 0 17 18 C 19 S 20 1					
Remarks					
M A J 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) GALLUP WASTEWATER TREATMENT PLANT, MCKINLEY COUNTY: FROM WESTBOUND I-40 TAKE EXIT 16 AND MAKE A LEFT (HEADED EAST) ON W. HISTORIC HWY 66. TRAVEL ABOUT 0.5 MILES TO INDUSTRY RD (NEXT TO SUNRISE II SELF STORAGE). MAKE A LEFT ON INDUSTRY, TAKE BRIDGE OVER THE TRAIN TRACKS & MAKE A RIGHT ON SWEETWATER AND PROCEED THROUGH THE ONE LANE TUNNEL. TREATMENT PLANT IS STRAIGHT AHEAD.	Entry Time /Date 10:40am 6/30/16	Permit Effective Date October 1, 2011
	Exit Time/Date Approximately 4pm 6/30/16	Permit Expiration Date September 30, 2016
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Peter Strimple, Transition Compliance Specialist (321)733-5249 Fax (321)733-5249 Mr. Robert Galaviz, Operator (505) 726-2440 Ms. Anna Plese, Lab Technician (505) 726-2440	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Ms. Maryann Ustick, City Manager City of Gallup 110 W. Aztec Gallup, NM 87301 (505) 863-1220	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	GPS: N. 35° 31.062' W. -108° 49.047' SIC 4952

Section C: Areas Evaluated During Inspection

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

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

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

See attached sheets.

Name(s) and Signature(s) of Inspector(s) Jennifer Foote /s/ Jennifer Foote	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0596	Date 7/29/16
Signature of Management QA Reviewer Bruce Yurdin, Program Manager /s/ Bruce Yurdin	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2795	Date 7/29/16

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED **_no_**)
 DETAILS: **Permit application was submitted in June**

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

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 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 yes.)
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE 18" parshall flume
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 _____) 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 Yes.)
 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. 10 % OF THE TIME. Y N NA6. SPIKED SAMPLES ARE ANALYZED. 10 % OF THE TIME. Y N NA7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME	BioAquatic	Hall Environmental
LAB ADDRESS	2501 Mayes Rd Ste 100, Carrollton TX 75006	4901 Hawkins NE / Albuquerque, NM 87109
PARAMETERS PERFORMED	WET	COPPER, BOD, TDS

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	None	Not observed	Opaque	minor	yes	brown	

RECEIVING WATER OBSERVATIONS: Clarifier #3 had discharged solids due to an equipment malfunction overnight and solids were still visible in effluent at time of inspection. Samples were not taken during the time of discharge to quantify quantity.**SECTION H - SLUDGE DISPOSAL**SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED yes).
DETAILS: Landfill and land application1. SLUDGE MANAGEMENT ADEQUATE. S M U NA2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. S M U NA3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: injection site adjacent to plant (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 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

Further Explanations
Gallup Wastewater Treatment Plant NPDES Permit No. NM0020672
Inspection Date: June 30, 2016

INTRODUCTION:

On June 30, 2016, Jennifer Foote and Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Gallup Wastewater Treatment Plant (WWTP). The Gallup WWTP has a design flow capacity of 3.5 million gallons per day (MGD) and is classified as a major municipal 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 NM0020672. This permit regulates the WWTP discharges to the Puerco River Segment 20.6.4.99, which was previously referred to as Rio Puerco of the West in the current permit. This segment includes the designated uses of warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

The NMED performs a certain number of inspections 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 NMED staff, and records and reports kept by the permittee and/or NMED.

INSPECTION DETAILS:

Upon arrival at the facility, the inspectors made introductions, stated the purpose of the inspections and Mr. Valenta presented credentials to Mr. Peter Strimple, Transition Compliance Specialist. The regular Project Manager, Ms. Pam Brotheridge (WW4 certified operator), was out for the week. The city manages the collection system, while the contractor, Severn Trent, manages the Plant and lift stations. We were told that the Severn Trent contract was now month to month until a new contractor is finalized. Mr. Robert Galaviz (WW2) gave us a tour of the plant and Ms. Anna Plese (WW Lab Tech 2) guided us through their laboratory procedures. At the end of the tour, the inspector conducted an exit interview with Mr. Strimple, Ms. Plese, and Mr. Fred Kriess of Severn Trent (via phone) to discuss preliminary findings of the inspection. A follow up conference call was conducted with Ms. Brotheridge and Mr. Strimple on 7/12/16.

TREATMENT SCHEME:

The City of Gallup has approximately 145 miles of collection system within its jurisdiction. About 0.64 miles of the collection system are concrete, and 92.58 miles of the collection system are comprised of clay pipe. The city experiences frequent Sanitary Sewer Overflows (SSO) and the older type of pipe may contribute to the issue. The city has experienced 18 reported SSOs in 2016, as of the time of the inspection. There are presently six lift stations that direct the wastewater flow to the Gallup WWTP from various locations around the city.

The Gallup WWTP accepts septic hauler dumping only, oil and grease must be hauled to another facility. Septic haulers can dump into the lines between 8am and 4pm once plant staff are notified and unlock the manhole. Initial tests for pH are done (septage between 5.5-9.5 SU is acceptable) to somewhat characterize the hauled waste before it is dumped into the system.

The equalization basin at the headworks of the facility has been out of service for several years. A lined basin west of the equalization basin was installed for the purpose of bypass/emergency flow storage, but is also not used. The influent flow is directed through an 18 inch Parshall flume where a flow sensor and recorder measure flow (currently not-functional). Supernatant from the sludge thickener is also reintroduced to the flow at the entrance works. An automatic alarm sensor activates the automatic dialer (via a SCADA system) in case of a high water emergency at the entrance works. Influent is then lifted by two of three screw pumps (two online and one for backup) to two Monster mechanical bandscreens, operated in parallel. Flow can also be diverted through a manual bar screen. The flow then enters one of two grit chambers, one a traditional basin grit removal system, and one a vortex grit removal system, where coarse grit is allowed to settle out and is collected. The screenings from the automated bar screens and grit from the grit chambers are collected into waiting receptacles, which are taken to the city landfill after a paint filter test is conducted.

Flow from the entrance works is split between three primary clarifiers. Flow from the vortex grit chamber is directed to primary clarifier #4 and flow from the basin grit chamber is directed to primary clarifiers #1 and #2. Each clarifier has a skimmer arm and a skirt to contain floating materials. At the bottom of the units, scrapers are utilized to move the sludge to a hopper in the center of the units. Waste Activated Sludge (WAS) is piped to a primary digester and then to a secondary digester. Scum and other floating material are also pumped to the primary digester.

After the primary clarifiers, the flow is recombined and sent to the aeration basins. The first aeration basin consists of four separate chambers which employ diffused air to enhance the activated sludge process. This unit is used to further reduce BOD levels and to provide additional control of filamentous bacteria, if needed. The flow then travels to the oxidation ditch, which contains four mechanical brush aerators to supply air for the activated sludge process.

After the oxidation ditch, the flow is split between three secondary clarifiers. The secondary clarifiers are sized as follows: #1 = 75 feet in diameter with a depth of 12 feet, #2 = 65 feet in diameter with a depth of 12 feet, and #3 = 65 feet in diameter with a depth of 15 feet. The sludge from these units is also sent to the primary aerobic digester if the plant is wasting. If not wasting, the sludge is continuously sent to the aeration basins by the use of two RAS screw pumps. The flow from the clarifiers is then recombined and directed to a cloth filter building (currently offline) to further filter the wastewater before being sent to disinfection. These filters are operated in parallel and they are backwashed on a daily basis. The backwash water is then sent to the headworks to be recombined with the influent flow. Flow from the cloth filters then enters the chlorine contact chamber. There are two separate serpentine chlorine contact chambers, which are operated in parallel. Chlorine gas is added to the effluent at the entrance to the contact basins for disinfection and sulfur dioxide is used as a dechlorinating agent at the exit of the basins to eliminate chlorine after disinfection has taken place. Some effluent is used periodically as reuse water in the city golf course and the city sports complex for irrigation. The effluent is measured by a 18-inch Parshall flume and ultrasonic totalizer.

SLUDGE:

After passing through the digestion basins, sludge is sent to the belt press, where it is brought up to a 17% solids level. It ranges from 14-25% solids on a regular basis. The facility has a few different options for handling their solids, but currently sends it to the landfill. Previously after the drying process, sludge was taken out to the adjacent 100 acre plot and incorporated into the soil for land application disposal. This facility has fourteen unlined sludge beds that are equipped with an underdrainage system and currently not in use. Sludge could also be hauled from the digestion units by injector truck to the same 100-acre plot. An incinerator is also located on site but is not functional.

Section B – Recordkeeping and Reporting Evaluation – Overall Rating of “Marginal”

The permit requires, in Part I.B.1 Schedule of Compliance:

b. No later than 14 calendar days following the date for compliance for Total Copper, the permittee shall submit a written notice of compliance or noncompliance. The written notice shall report on all tasks that were done to achieve compliance.

The permit requires, in Part I.B.1 Signatory Requirements:

b. ALL REPORTS required by the permit and other information requested by the Director shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if: (1) The authorization is made in writing by a person described above;

The permit requires, in Part III, Section C.5.Monitoring Procedures:

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.

The permit requires, in Part III, Section D.9 Other Information:

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

Findings for Recordkeeping and Reporting:

- A written notice of compliance for Total Copper was not provided. The report is being prepared.
- A delegation of authority letter to sign DMRs and other permit documents, for the Project Manager who began in November 2015, was dated July 8 2016 and provided after the inspection.
- The thermometer in the effluent refrigerated sampler had expired calibration records. Calibration is scheduled to occur in the next month.
- During the ongoing document review for the turnover, Severn Trent determined that copper has been reported in the wrong units on the DMR reports. Corrected DMR and quarterly reports are being prepared.

Comments on Electronic Reporting

USEPA is encouraging Permittees to transition from submitting paper DMRs to the electronic reporting NetDMR system. Information on the NetDMR training can be found at <http://epa.gov/netdmr/about/training.html>.

Section C - Operations and Maintenance - Overall rating of "Unsatisfactory"

The permit requires, in Part III.B.3 Proper Operation 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. 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.*
- b. *The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to ensure compliance with the conditions of this permit.*

Comments for Operations and Maintenance:

- The facility maintains some backup equipment. The facility has an electronic maintenance schedule and tracking system.

Findings for Operations and Maintenance:

- During the visit the facility was discharging partially treated sludge. Mr. Galaviz stated that the RAS pump at secondary clarifier #3 had turned off sometime the afternoon before, the Scada system had malfunctioned, and the sludge blanket had overtopped the weirs by morning. TSS samples are only required to be taken once a week and were not scheduled to be taken this day, so estimates of the amounts of the solids released are not available. **See attached 5 day written report/notification from Severn Trent dated July 5, 2016 for additional information on the cause and follow up actions.**
- On January 21, 2016 a plugged line at the WWTP led to a 400 gallon sludge discharge to the Rio Puerco.
- Of the 16 reported SSOs that have occurred through June 2016 (see attachment), two reached a watercourse.
- Several items of equipment normally included in the treatment scheme were not functioning at the time of the inspection: one of the two chlorination contact chambers was offline, the cloth filter unit is offline, the RAS pumps for #1 and #2 final clarifiers don't function and an air siphon is used to drain the solids. Final clarifier #2 was offline, two of the four mechanical brush aerators on the oxidation ditch were not functional due to electrical problems. The influent meter was not functioning.
- There is an open manhole next to the influent lift station that was awaiting repairs. What appears to be sludge is visible on the ground.
- There were indications of a backup and overflow at the band screen area, which flows towards a storm drain that discharges to the river rather than back to the plant headworks. The facility stated that the SWPPP was under revision and a Stormwater NOI would be submitted in the future.
- A written procedure for emergency treatment control was not available. A bypass/emergency flow storage basin is present but not used.
- A New Mexico Level 4 Wastewater Operator is required to operate this facility. Facility is staffed by a single Level 4 Wastewater Operator who was out on leave at the time of inspection.

Section E – Flow Measurement - Overall rating of "Marginal"

The permit requires, in Part III, Section 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.

Findings for Flow Measurement:

- No records of flow meter calibration were provided. Facility staff stated they do not compare the parshall flume reading to the flow meter on a regular basis.

Section F - Laboratory - Overall rating of "Marginal"

The permit requires, in Part III, Section C.5. Monitoring Procedures:

c. 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.

Comments for Laboratory:

- E-coli, Chlorine and TSS are performed at the facility. The remainder of samples are sent to an outside lab.

Findings for Laboratory:

- Duplicate and spike samples are not being submitted.

Section G – Effluent/Receiving Water Observations - Overall rating of "Unsatisfactory"

The permit requires, in Part I.A.3 Floating Solids, Visible Foam And/Or Oils:

There shall be no discharge of floating solids or visible foam in other than trace amounts. There shall be no discharge of visible films of oil, globules of oil, grease or solids in or on the water, or coatings on stream banks.

Findings for Effluent/Receiving Water Observations:

- Effluent contained suspended solids.
- Reuse water did not appear clear, bubbles were rising to the surface indicating denitrification was occurring in solids at the bottom, and visible globules of oil or grease were present.

Section H - Sludge - Overall rating of "Unsatisfactory"

The permit requires, in Part IV, Major - Sewage Sludge Requirements:

If your facility utilizes more than one type of disposal or reuse method (for example, Element I and Element II apply) or the quality of your sludge varies (for example, Section II and Section III of Element I apply) use a separate Discharge Monitoring Report (DMR) for each Section that is applicable.

The permit requires, in Part IV Section II, Requirements Specific To Surface Disposal Sites Without A Liner And Leachate Collection System.

1. Pollutant limits - Sewage sludge shall not be applied to a surface disposal site if the concentration of the listed pollutants exceed the corresponding values based on the surface disposal site boundary to the property line distance:

TABLE 5 Pollutant Concentrations*

<i>Unit boundary to property line distance (meters)</i>	<i>Arsenic (mg/kg)</i>	<i>Chromium (mg/kg)</i>	<i>Nickel (mg/kg)</i>	<i>PCB's (mg/kg)</i>
<i>25 to less than 50</i>	<i>34</i>	<i>220</i>	<i>240</i>	<i>49</i>

Findings for Sludge:

- The Production and Use DMR Form SLD-P shows that sludge was both land applied and disposed in a landfill in the last year. DMR form SLS-A was submitted showing surface disposal for all four quarters.
- The surface disposal DMR forms SLS-A showed incorrect values for allowed concentrations (200 instead of 34 for Arsenic, 427 instead of 240 for nickel, and 70.7 instead of 220 for Chromium).
- The values submitted in the DMRs exceeded the actual allowable values for nickel in the second quarter, and arsenic in the fourth and third quarters.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: J. Foote	Date: 6/30/16	Time: 12:04 pm
City/County: Gallup/McKinley County	State: New Mexico	
Location: Gallup WWTP		
Subject: thermometer in effluent composite cooler- calibration certification is expired		



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: D. Valenta	Date: 6/30/16	Time: 11:42 am
City/County: Gallup/McKinley County	State: New Mexico	
Location: Gallup WWTP		
Subject: secondary clarifier #1		



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: D. Valenta	Date: 6/30/16	Time: 12:14 pm
City/County: Gallup/McKinley County	State: New Mexico	
Location: Gallup WWTP		
Subject: pump in clarifer #3 malfunctioned leading to weirs overtopping and releasing solids		



NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: J. Foote

Date: 6/30/16

Time: 12:00 pm

City/County: Gallup/McKinley County

State: New Mexico

Location: Gallup WWTP

Subject: Chlorine contact chamber with partially treated effluent



NMED/SWQB
Official Photograph Log
Photo # 5

Photographer: D. Valenta

Date: 6/30/16

Time: 12:01 pm

City/County: Gallup/McKinley County

State: New Mexico

Location: Gallup WWTP

Subject: effluent flume



NMED/SWQB
Official Photograph Log
Photo # 6

Photographer D. Valenta	Date: 6/30/16	Time: 12:11 pm
City/County: Gallup/McKinley County	State: New Mexico	
Location: Gallup WWTP		
Subject: effluent at discharge to Puerco River		



NMED/SWQB
Official Photograph Log
Photo # 7

Photographer D. Valenta	Date: 6/30/16	Time: 11:53 am
City/County: Gallup/McKinley County	State: New Mexico	
Location: Gallup WWTP		
Subject: reuse water storage		



**NMED/SWQB
Official Photograph Log
Photo # 8**

Photographer: J. Foote	Date: 6/30/16	Time: 11:09 am
City/County: Gallup/McKinley County	State: New Mexico	
Location: Gallup WWTP		
Subject: open manhole		



**NMED/SWQB
Official Photograph Log
Photo # 9**

Photographer D. Valenta	Date: 6/30/16	Time: 11:11 am
City/County: Gallup/McKinley County	State: New Mexico	
Location: Gallup WWTP		
Subject: storm drain to Puerco River in foreground, manhole and bandscreen in background		



Jenni Fer



RECEIVED

JUL 07 2016

SURFACE WATER
QUALITY BUREAU

Severn Trent – North America
Western US Regional Office
402 North Neely Street
Gilbert, AZ 85233
(623 572 8550)

July 5, 2016

Via E Mail

Original Copy Sent Via Certified Mail

Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75702-2733

Re: City of Gallup, New Mexico Wastewater Treatment Plant/5 Day Written Report/Notification of Discharge of Elevated Total Suspended Solids/NPDES Permit NM0020672

To whom it may concern:

This letter is being submitted pursuant to the five (5) day notification requirement in the above-referenced permit related to certain effluent discharges from the City of Gallup Wastewater Treatment Plant. This letter also follows up on the required 24 hour notification of the event, which was submitted via e mail transmission on Friday, July 1st at 11:17 Mountain Time. The 24 hour notification (to Region 6) was sent via e mail to R6_NPDES_reporting@epa.gov, a copy of which is attached for reference.

Verbal notification was also provided to the New Mexico Environmental Department and the Navajo Nation EPA via telephone as required in the permit.

The following is a description of the event:

On June 29th, at 1400 hours multiple alarms were received simultaneously by the plant SCADA system. Plant staff acknowledged the multiple alarms and, based on operational observations, it was believed that these were a result of a false alarm condition. However, one alarm was related to an actual failure of the Return Activated Sludge ("RAS") Pump Unit for Final Clarifier #3. Please note that the plant is not staffed 24/7 and plant staff leaves the facility at approximately 1530 hours. On Thursday morning (June 30th) plant staff noted the failure upon arrival to the facility (discovering an elevated sludge blanket) and immediately began to diagnose the failure and initiate corrective actions. Our staff restored the RAS pump at approximately 0745 hours. As plant flows began to increase, staff diverted all flows to Final Clarifier #2 as an interim step to control the elevated sludge blanket in Final Clarifier #3. As a result of the RAS unit failure, elevated total suspended solids were observed in the effluent leaving the facility.

It is important to note that plant flows diminish significantly between midnight and 0600 hours with very little to no discharge. It is difficult to determine the duration of the elevated total suspended solids



Severn Trent – North America
Western US Regional Office
402 North Neely Street
Gilbert, AZ 85233
(623 572 8550)

discharge, but we suspect that this began to occur as flows picked up on the morning of June 30th and continued while the plant conditions were being stabilized and returned to normal.

As actions were taken to clean the chlorine contact basin and reduce the sludge blanket level, the clarity of the effluent began to improve. By the morning of July 1st, the visible condition of the plant effluent was noticeably improved. This improvement has continued and the plant effluent has returned to a normal condition.

The permit requirement stipulates compliance of a weekly average for composite samples (45 mg/L). There is no daily maximum level stipulated in the permit. None of the available data indicates that this weekly average limit was exceeded. A composite effluent total suspended solids result was analyzed with a sample date of June 29th and a recorded result of 3.2 mg/L. Subsequent samples were collected on July 1st and are preserved for analysis by the plant laboratory technician. Should any of the samples indicate that the weekly average permit limit was exceeded, this will be reported, as required, on the Discharge Monitoring Report submitted for the month of June.

A detailed root cause analysis is being completed by plant staff to identify any more corrective actions that are required to prevent and minimize any future failures of the pump which had failed in this instance. Additionally, the instrumentation technician will perform a diagnostic review of the plant SCADA system to determine the cause of the multiple alarms that had occurred.

Please contact our Project Manager, Pamela Brotheridge at (505) 726 2440 should you have any questions regarding the event or require additional details regarding the corrective actions.

Sincerely,

Fred Kriess
Regional Manager

cc Richard Matzke, City of Gallup
New Mexico Environmental Department
Navajo Nation, EPA office
Pamela Brotheridge, Severn Trent Services

Kriess, Fred

From: Strimple, Peter
Sent: Friday, July 01, 2016 11:17 AM
To: R6_NPDES_reporting@epa.gov
Cc: Turnbull, Chris; Hoban, Matthew; Kriess, Fred; Brotheridge, Pamela
Subject: City of Gallup WWTP; NPDES permit #NM0020672

Good morning.

Severn Trent Environmental Services operates the wastewater treatment plant in Gallup, NM. The WWTP operates under NPDES permit #NM0020672.

The facility address is 800 Sweetwater Place, Gallup, NM 87301.

This email is being sent to report a plant upset, caused by a clarifier pump failure, that was discovered on the morning of Thursday, June 30. As a result of the pump failure, excess solids were discharged through the plant effluent. The problem has been corrected and the effluent is now clear.

As required by the permit, a written report will be submitted within 5 days of the time we became aware of this circumstance.

Contact phone numbers:

Pam Brotheridge (Project Manager): (505)236-2309

WWTP office: (505)726-2440

Thank you.

Peter Strimple

Transition Compliance Specialist – Technical Solutions Group

Severn Trent – North America

www.severntrentservices.com

Tracking Log Gallup Reported SSOs

Date overflow	Location	Estimated volume	Discharge to watercourse
2/5/2016	Rte 66	30gal	no sewage to watercourse
2/9/2016	800 S Country Club Drive	100 gal	no sewage to watercourse
2/22/2016	402 Valentino	10gal	no sewage to watercourse
2/24/2016	Clark +Gold	30 gal	no sewage to watercourse
2/28/2016	1907 Mark	20	no sewage to watercourse
3/2/2016	N5th +Maloney	2800	Rio Puerco
3/7/2016	107 W Aztec	10	no sewage to watercourse
3/18/2016	Hwy 66	50	no sewage to watercourse
4/9/2016	301 Patton	50	no sewage to watercourse
5/19/2016	107 W Green	720	Little Puerco
5/29/2016	108 Morgan	30	no sewage to watercourse
5/29/2016	309 E NM118	6000	no sewage to watercourse
5/31/2016	105 Apache	50	no sewage to watercourse
6/21/2016	406 S. Puerco	100gal (5 gal to storm drain)	no sewage to watercourse
6/22/2016	Hwy 66	20 gal	no sewage to watercourse
6/25/2016	manhole 2000 W Hwy 66	20 gal	no sewage to watercourse



Mayor Jackie McKinney
Councilor Linda Garcia, District 1
Councilor Allan Landavazo, District 2
Councilor Yogash Kumar, District 3
Councilor Fran Palochak, District 4

Maryann Ustick, City Manager
George W. Kozeliski, City Attorney

July 8, 2016

Ms. Hannah Branning
EPA Region 6(6EN-WC)
Water Enforcement Branch
Compliance Monitoring Section
1445 Ross Avenue
Dallas, Texas 75202

RE: City of Gallup Permits Signature Authority

The City of Gallup wishes to inform the USEPA that as of November 1, 2015 the new Project and Plant Manager is Mrs. Pamela Brotheridge. Mrs. Brotheridge is hereby granted signature authority of City of Gallup Permits: NPDES NM0020672, Groundwater DP-418, DP-95, DP-1068 and DP-1342.

Severn Trent Environmental Services (STES), Mrs. Pamela Brotheridge and all correspondence related to the aforementioned permits may be contacted through and sent to the City of Gallup- Gallup Joint Utilities Administration, Wastewater Treatment Plant, P.O. Box 1270, Gallup, New Mexico 87305. If you have additional questions you may call the Gallup Joint Utilities Administration office at (505) 863-1289.

Sincerely,

Richard Matzke,
Acting Water/Wastewater Director

Xc: Pamela Brotheridge, Project & Plant Manager
Ernest Thompson, Water/Wastewater Superintendent
Gary Munn, Chief Engineer
File



Severn Trent
PO Box 478
Gallup, NM 87305
United States

T: +1 505 726 2440
F: +1 505 726 2441

February 19th, 2016

Ms. Hannah Branning
Compliance Assurance and Enforcement Division
Water Enforcement Branch (6EN-WC)
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

RE: City of Gallup
NPDES Permit No. NM 0020672
2015 Annual 503 Sludge Report

Dear Ms. Branning,

Please find enclosed the 2015 Annual 503 Sludge Report, Certification Statement and the 2015 Sludge DMR.

If you have any questions or concerns, please call me at (505)726-2440.

Thank you,

Pam Brotheridge
Project Manager – Gallup Project
Severn Trent – North America
P.O. Box 478 | Gallup, NM 87305
O: 505-726-2440 | M: 505-236-2309 | www.severntrentservices.com

cc: Vince Tovar, Executive Director of Water & Sanitation, City of Gallup
File

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305
FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

NM0020672	SLD-P
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

MONITORING PERIOD	
MM/DD/YYYY	MM/DD/YYYY
01/01/2015	12/31/2015

PRODUCTION AND USE
External Outfall

ATTN: ROBERT SEKIYA, SUPERINTENDENT

No Discharge

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS				
Polychlorinated biphenyls (PCBs) 39516 SL 0 Sludge	SAMPLE MEASUREMENT							<0.5	mg/kg	0	01/YR	BATCH
	PERMIT REQUIREMENT							49.99 ANNL MAX	mg/kg		See Permit	BATCH
Toxicity characteristic leaching procedure 46390 SL 0 Sludge	SAMPLE MEASUREMENT			0				N/A		0	01/5yr	N/A
	PERMIT REQUIREMENT			Req. Mon. VALUE				pass=0/fail =1			See Permit	BATCH
Ann. amt sludge disposed by other method 49017 V 0 See Comments	SAMPLE MEASUREMENT		217	metric T/yr						0	01/yr	EST
	PERMIT REQUIREMENT		Req. Mon. ANNL TOT	metric T/yr							Annual	ESTIMA
Annual amt of sludge incinerated 49018 SL 0 Sludge	SAMPLE MEASUREMENT		0	metric T/yr						0	N/A	N/A
	PERMIT REQUIREMENT		Req. Mon. ANNL TOT	metric T/yr							Annual	ESTIMA
Annual sludge production, total 49019 SL 0 Sludge	SAMPLE MEASUREMENT		772	metric T/yr						0	01/yr	Est.
	PERMIT REQUIREMENT		Req. Mon. ANNL TOT	metric T/yr							Annual	ESTIMA
Annual amount of sludge land applied 49020 SL 0 Sludge	SAMPLE MEASUREMENT		555	metric T/yr						0	01/yr	Est.
	PERMIT REQUIREMENT		Req. Mon. ANNL TOT	metric T/yr							Annual	ESTIMA
Annual amt. sludge disposed surface unit 49021 SL 0 Sludge	SAMPLE MEASUREMENT		N/A	N/A						0	N/A	N/A
	PERMIT REQUIREMENT		Req. Mon. ANNL TOT	metric T/yr							Annual	ESTIMA

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER <i>Pamela Bratteridge</i> TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	<i>Pamela Bratteridge</i> SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE	DATE	
			505 236 2389	02/11/2016	
			AREA Code	NUMBER	MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
V = IF ANNUAL SLUDGE DISPOSED BY OTHER METHODS IS APPLICABLE, EXPLAIN METHOD OF DISPOSAL.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305
FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

NM0020672	SLD-P
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

ATTN: ROBERT SEKIYA, SUPERINTENDENT

MONITORING PERIOD	
MM/DD/YYYY	MM/DD/YYYY
FROM 01/01/2015	TO 12/31/2015

PRODUCTION AND USE
External Outfall

No Discharge

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Annual amt sludge disposed in landfill 49022 SL 0 Sludge	SAMPLE MEASUREMENT	*****	217	metric/yr	*****	*****	*****	*****	0	01/yr	EST
	PERMIT REQUIREMENT	*****	Req. Mon. ANNL TOT	metric/yr	*****	*****	*****	*****		Annual	ESTIMA
Annual amt sludge transported interstate 49023 SL 0 Sludge	SAMPLE MEASUREMENT	*****	217	metric/yr	*****	*****	*****	*****	0	01/yr	EST
	PERMIT REQUIREMENT	*****	Req. Mon. ANNL TOT	metric/yr	*****	*****	*****	*****		Annual	ESTIMA

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER <i>Tamela Bratheridge</i> TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted hereon is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE	DATE
		585 236 2309	02/19/2016
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>Tamela Bratheridge</i>		ARBA Code	NUMBER
			MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
V = IF ANNUAL SLUDGE DISPOSED BY OTHER METHODS IS APPLICABLE, EXPLAIN METHOD OF DISPOSAL.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305
FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

NM0020672	SLS-A
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

MONITORING PERIOD	
MM/DD/YYYY	MM/DD/YYYY
FROM 01/01/2015	TO 12/31/2015

SURFACE DISPOSAL
External Outfall

ATTN: ROBERT SEKIYA, SUPERINTENDENT

No Discharge

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Arsenic, dry weight 01003 SL 0 Sludge	SAMPLE MEASUREMENT					200	19	mg/kg	0	01/YR	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Unit w/liner/leachate collection system 49028 SL 0 Sludge	SAMPLE MEASUREMENT						N/A	0	0	N/A	N/A
	PERMIT REQUIREMENT						Req. Mon. VALUE	Y=1;N=0			
Unit boundary to property line distance 49029 SL 0 Sludge	SAMPLE MEASUREMENT						27	m	0	01/YR	N/A
	PERMIT REQUIREMENT						Req. Mon. VALUE	m			
Nickel, dry weight 78468 SL 0 Sludge	SAMPLE MEASUREMENT					427	55	mg/kg	0	01/90	BATCH
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Chromium, dry weight 78473 SL 0 Sludge	SAMPLE MEASUREMENT					70.7	42	mg/kg	0	01/90	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Level of pathogen requirements achieved 84368 T 0 See Comments	SAMPLE MEASUREMENT						2	T	0	01/90	Batch
	PERMIT REQUIREMENT						Req. Mon. SINGSAMP	state class		Contingent	BATCH
Description of pathogen option used 84369 SL 0 Sludge	SAMPLE MEASUREMENT						1	ALT	0	01/90	Batch
	PERMIT REQUIREMENT						Req. Mon. VALUE	alt #		Contingent	BATCH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER <i>Pamela Brothendy</i> TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>Pamela Brothendy</i>	TELEPHONE	DATE
			AREA Code	NUMBER
			5052362309	02/19/2016

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

T = STATE CLASS: A = 1, B = 2, NONE = 0.

1st Quarter

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305
FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

ATTN: ROBERT SEKIYA, SUPERINTENDENT

NM0020672
PERMIT NUMBER

SLS-A
DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

MONITORING PERIOD
MM/DD/YYYY TO MM/DD/YYYY
FROM 01/01/2015 TO 12/31/2015

SURFACE DISPOSAL
External Outfall

No Discharge

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Vector attraction reduction alternative used B4370 SL 0 Sludge	SAMPLE MEASUREMENT	*****	*****	*****	*****	*****	10	10	0	02/05	Batch
	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	Req. Mon. VALUE	alt #		Contingent	BATCH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER <i>Pamela Brothridge</i> TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted in the form of my knowledge and belief, was accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>Pamela Brothridge</i>	TELEPHONE	DATE
			AREA Code	NUMBER

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

T = STATE CLASS: A = 1, B = 2, NONE = 0.

1st Quarter

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305
FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

NM0020672
PERMIT NUMBER

SLS-A
DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

MONITORING PERIOD
MM/DD/YYYY TO MM/DD/YYYY
FROM 01/01/2015 TO 12/31/2015

SURFACE DISPOSAL
External Outfall

No Discharge

ATTN: ROBERT SEKIYA, SUPERINTENDENT

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Arsenic, dry weight 01003 SL 0 Sludge	SAMPLE MEASUREMENT					200	19	mg/kg	17	01/yr	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Unit w/liner/leachate collection system 49028 SL 0 Sludge	SAMPLE MEASUREMENT					N/A	0		0	N/A	N/A
	PERMIT REQUIREMENT						Req. Mon. VALUE	Y=1;N=0			
Unit boundary to property line distance 49029 SL 0 Sludge	SAMPLE MEASUREMENT					27	m		0	N/A	N/A
	PERMIT REQUIREMENT						Req. Mon. VALUE	m			
Nickel, dry weight 78469 SL 0 Sludge	SAMPLE MEASUREMENT					427	299	mg/kg	0	01/90	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Chromium, dry weight 78473 SL 0 Sludge	SAMPLE MEASUREMENT					70.7	3	mg/kg	0	01/90	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Level of pathogen requirements achieved 84368 T 0 See Comments	SAMPLE MEASUREMENT					2	T		0	01/90	Batch
	PERMIT REQUIREMENT						Req. Mon. SINGSAMP	state class		Contingent	BATCH
Description of pathogen option used 84369 SL 0 Sludge	SAMPLE MEASUREMENT					1	ALT		0	01/90	Batch
	PERMIT REQUIREMENT						Req. Mon. VALUE	all#		Contingent	BATCH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER <i>Pamela Broderidge</i> TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, in the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE		DATE	
		505 236 2309	02/19/2016	AREA Code	NUMBER
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>Pamela Broderidge</i>					

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

T = STATE CLASS: A = 1, B = 2, NONE = 0.

2nd Quarter

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305

NM0020672
PERMIT NUMBER

SLS-A
DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

MONITORING PERIOD
FROM 01/01/2015 TO 12/31/2015

SURFACE DISPOSAL
External Outfall

ATTN: ROBERT SEKIYA, SUPERINTENDENT

No Discharge

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Vector attraction reduction alternative used 84370 SL 0 Sludge	SAMPLE MEASUREMENT						10	10	0	02/05	Batch
	PERMIT REQUIREMENT						Req. Mon. VALUE	alt #		Contingent	BATCH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE	DATE
<i>Pamela Brothridge</i> TYPED OR PRINTED		<i>Pamela Brothridge</i> SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	5052362389
		AREA Code	NUMBER
		MM/DD/YYYY	

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

T = STATE CLASS: A = 1, B = 2, NONE = 0.

2nd Quarter

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305
FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

NM0020672	SLS-A
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

MONITORING PERIOD	
MM/DD/YYYY	MM/DD/YYYY
01/01/2015	12/31/2015

SURFACE DISPOSAL
External Outfall

ATTN: ROBERT SEKIYA, SUPERINTENDENT

FROM

TO

No Discharge

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Arsenic, dry weight 01003 SL 0 Sludge	SAMPLE MEASUREMENT					200	98		0	01/yr	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/lg		Contingent	BATCH
Unit w/liner/leachate collection system 49028 SL 0 Sludge	SAMPLE MEASUREMENT						N/A	0	0	N/A	N/A
	PERMIT REQUIREMENT						Req. Mon. VALUE	Y=1;N=0			
Unit boundary to property line distance 49029 SL 0 Sludge	SAMPLE MEASUREMENT					27		m	0	01/yr	N/A
	PERMIT REQUIREMENT						Req. Mon. VALUE	m			
Nickel, dry weight 78469 SL 0 Sludge	SAMPLE MEASUREMENT					427	60	mg/kg	0	01/90	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Chromium, dry weight 78473 SL 0 Sludge	SAMPLE MEASUREMENT					76.7	60	mg/kg	0	01/90	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Level of pathogen requirements achieved 84368 T 0 See Comments	SAMPLE MEASUREMENT						2	T	0	01/90	Batch
	PERMIT REQUIREMENT						Req. Mon. SINGSAMP	state class		Contingent	BATCH
Description of pathogen option used 84369 SL 0 Sludge	SAMPLE MEASUREMENT						1	A11	0	01/90	Batch
	PERMIT REQUIREMENT						Req. Mon. VALUE	all #		Contingent	BATCH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER <i>Vanella Brothridge</i> TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, in the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>James J. [Signature]</i>	TELEPHONE	DATE
			AREA Code	NUMBER

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

T = STATE CLASS: A = 1, B = 2, NONE = 0.

3rd Quarter

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0001

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305
FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

NM0020672	SLS-A
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

MONITORING PERIOD			
MM/DD/YYYY		MM/DD/YYYY	
FROM 01/01/2015	TO	12/31/2015	

SURFACE DISPOSAL
External Outfall

No Discharge

ATTN: ROBERT SEKIYA, SUPERINTENDENT

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Vector attraction reduction alternative used 84370 SL 0 Sludge	SAMPLE MEASUREMENT	*****	*****	*****	*****	*****	10	10	0	01/05	Batch
	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	Reg. Mon. VALUE	alt #		Contingent	BATCH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER <i>Pamela Brothridge</i> TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and verified the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE	DATE
		5052362309	02/19/2016
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>Pamela Brothridge</i>	AREA Code	NUMBER	MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

T = STATE CLASS: A = 1, B = 2, NONE = 0.

3rd Quarter

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305
FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

NM0020672	SLS-A
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

MONITORING PERIOD	
MM/DD/YYYY	MM/DD/YYYY
FROM 01/01/2015	TO 12/31/2015

SURFACE DISPOSAL
External Outfall

No Discharge

ATTN: ROBERT SEKIYA, SUPERINTENDENT

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Arsenic, dry weight 01003 SL 0 Sludge	SAMPLE MEASUREMENT					200	64	mg/kg	0	01/yr	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Unit w/liner/leachate collection system 49028 SL 0 Sludge	SAMPLE MEASUREMENT					N/A	0		0	N/A	N/A
	PERMIT REQUIREMENT						Req. Mon. VALUE	Y=1;N=0			
Unit boundary to property line distance 49029 SL 0 Sludge	SAMPLE MEASUREMENT					27	m		0	01/yr	N/A
	PERMIT REQUIREMENT						Req. Mon. VALUE	m			
Nickel, dry weight 78469 SL 0 Sludge	SAMPLE MEASUREMENT					427	13	mg/kg	0	01/90	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Chromium, dry weight 78473 SL 0 Sludge	SAMPLE MEASUREMENT					70.7	7.7	mg/kg	0	01/90	Batch
	PERMIT REQUIREMENT					Req. Mon. ALLWCONC	Req. Mon. SINGSAMP	mg/kg		Contingent	BATCH
Level of pathogen requirements achieved 84368 T 0 See Comments	SAMPLE MEASUREMENT					2	T		0	01/90	Batch
	PERMIT REQUIREMENT						Req. Mon. SINGSAMP	state class		Contingent	BATCH
Description of pathogen option used 84369 SL 0 Sludge	SAMPLE MEASUREMENT					1	AH		0	01/90	Batch
	PERMIT REQUIREMENT						Req. Mon. VALUE	alt#		Contingent	BATCH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER TAMELA BROTHSIDGE TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE	DATE
		505 236 2389	02/19/2016
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>Tamela Brothsidge</i>		AREA Code	NUMBER
			MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

T = STATE CLASS: A = 1, B = 2, NONE = 0.

4th Quarter

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: CITY OF GALLUP
ADDRESS: P.O. BOX 1270
GALLUP, NM 87305
FACILITY: GALLUP, CITY OF
LOCATION: 800 SWEETWATER PL
GALLUP, NM 87301

NM0020672	SLS-A
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 87305
MAJOR

MONITORING PERIOD			
MM/DD/YYYY		MM/DD/YYYY	
01/01/2015	FROM	12/31/2015	TO

SURFACE DISPOSAL
External Outfall

No Discharge

ATTN: ROBERT SEKIYA, SUPERINTENDENT

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS				
Vector attraction reduction alternative used 84370 SL 0 Sludge	SAMPLE MEASUREMENT							10	10	0	01/05	Batch
	PERMIT REQUIREMENT							Reg. Mon. VALUE	alt #		Contingent	BATCH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE	DATE
<i>Pamela Brothridge</i> TYPED OR PRINTED		<i>Pamela Brothridge</i> SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	5052362389
		AREA Code	NUMBER
		MM/DD/YYYY	

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

T = STATE CLASS: A = 1, B = 2, NONE = 0.

4th Quarter