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

May 23, 2016

Mr. Juan Fuentes, City Manager
City of Truth or Consequences
505 Sims Road
Truth or Consequences, NM 87901

Re: Truth or Consequences Wastewater Treatment Plant; Major Municipal; SIC 4952; NPDES Compliance Evaluation Inspection; NM0020681; May 12, 2016

Dear Mr. Fuentes:

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

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 (6EN-WC) by e-mail
Brent Larsen, USEPA (6WQ-PP) by e-mail
Tung Nguyen, USEPA (6WQ-PP) by e-mail
NMED District III, Mike Kesler by e-mail
Sandra Whitehead, Mayor Pro-Tem by email

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	3	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	N	MJ0020681			160512			C		S		1

Remarks: MAJOR WWTP

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
				4		N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

TRUTH OR CONSEQUENCES WASTEWATER TREATMENT PLANT:
From I-25, take the Williamsburg Exit (Exit 75) and follow Broadway St. Turn right on Radium Street to the end.
SIERRA COUNTY

Entry Time /Date
11:57
May 12, 2016

Exit Time/Date
4:00 pm
May 12, 2016

Permit Effective Date
March 1, 2009

Permit Expiration Date
February 28, 2014
Administratively continued

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
JESUS SALAYANDIA, WASTEWATER DIVISION DIRECTOR (575) 894-7331
JERRY BONNER, OPERATOR, LAB MANAGER (575) 740-5272

Name, Address of Responsible Official/Title/Phone and Fax Number

MR. JUAN FUENTES, CITY MANAGER (575) 894-6673
505 SIMS STREET
TRUTH OR CONSEQUENCES, NM 87901

Contacted
Yes [ ] No [x]

Other Facility Data

GPS outfall:
N 33° 06' 49.66"
W -107° 16' 54.64"
SIC 4952

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
S	Effluent/Receiving Waters	S	Laboratory	N	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)	Agency/Office/Telephone/Fax	Date
Jennifer Foote */s/ Jennifer Foote*	**NMED/SWQB 505-827-0596**	
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Bruce Yurdin, Program Manager */s/Bruce Yurdin*	**NMED/SWQB 505-827-2795**	

Truth or Consequences WWTP	PERMIT NO. NM0020681

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* **_yes** *)*
DETAILS: **Administratively continued**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE ☒ Y ☐ N ☐ NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES **Planned increased design flow.** ☐ 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

Truth or Consequences WWTP	PERMIT NO. NM0020681

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 _).*
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 __)*
DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. ☒ Y ☐ N ☐ NA
TYPE OF DEVICE **9" parshall flume**

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. ☒ Y ☐ N ☐ NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. **Isco 4210 Ultrasonic** ☒ Y ☐ N ☐ NA

4. CALIBRATION FREQUENCY ADEQUATE. *(DATE OF LAST CALIBRATION* **Nov 2, 2015**) **Calibration completed within 10% error** ☒ 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

Truth or Consequences WWTP	PERMIT NO. NM0020681

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.. ☐ S ☒ M ☐ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☒ S ☐ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 10 % OF THE TIME. ☐ Y ☒ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. __ % OF THE TIME. ☐ Y ☐ N ☒ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

LAB NAME	Wilkins Environmental	INTERLAB
LAB ADDRESS	832 NW 67th St #1, Oklahoma City, OK 73116	3655 S. RESEARCH DR, GENESIS B; LAS CRUCES, NM; 88003
PARAMETERS PERFORMED	WET	COPPER

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED __).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	none	none	none	none	none	

RECEIVING WATER OBSERVATIONS: Carp were gathering at the outfall.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED __).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA

2. 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 __).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE __ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☐ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☐ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☐ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☐ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☐ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☐ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☐ NA

Further Explanations
Truth or Consequences Wastewater Treatment Plant NPDES Permit No. NM0020681
Inspection Date: May 12, 2016

INTRODUCTION:
On May 12, 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 Truth or Consequences (T or C) Wastewater Treatment Plant (WWTP). A compliance inspection for the facility's MSGP was conducted concurrently. The T or C WWTP has a design flow capacity of 1.06 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 NM0020681. This permit regulates the WWTP discharge to the Rio Grande in Water Quality Segment 20.6.4.103 of the New Mexico Administrative Code (NMAC). This segment includes the designated uses of irrigation, livestock watering, wildlife habitat, marginal coldwater aquatic life, secondary contact, and warmwater aquatic life. Flow in this reach of the Rio Grande main stem is dependent upon releases from Elephant Butte Dam.

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. Jesus Salayandia, Wastewater system Director and Ms. Tracy Burnette, Administrative Assistant. Plans for upgrades to the facility were discussed and then inspectors and Mr. Salayandia toured the facility. At the end of the tour, the inspector conducted an exit interview with Mr. Salayandia, Ms. Burnette, Mr. Jerry Bonner, Lab Technician, and Ms. Sandra Whitehead Mayor Pro-Tem to discuss preliminary findings of the inspection.

TREATMENT SCHEME:
The Truth or Consequences (T or C) WWTP serves the city of Truth or Consequences and the Village of Williamsburg with an approximate, combined population of 7,900 people. The WWTP is an extended aeration activated sludge treatment system with chlorine disinfection and dechlorination. This plant was built in 1977 and the City is currently preparing and scheduling for rehabilitation (Phase I of the renovation is planned to start within the next month). Wastewater gravity flows into the facility from five lift stations and enters the headworks where a mechanical bar screen and back up manual screen are located. Materials collected from the bar screen are stored in a trash bin, and then are spread out in one of the facility's sludge beds to dry. Once dry, the material is sent to the Corralitos Landfill near Las Cruces, NM for final disposal.

Wastewater passes through the screen to a grit separator and removal system, which is currently offline. The grit system consists of a cylindrical circulating tank where grit settles out and then passes through a fine mesh screen. The grit waste is collected in a dumpster and any liquid is returned to the headworks.

Wastewater from the grit chamber gravity flows into a racetrack type extended aeration basin equipped with three surface power brush rotors that are used for aeration. A scum trough in the aeration basin collects excess foam that is sent directly to the foam drying beds, until landfill disposal occurs.

Wastewater exits the aeration basin and gravity flows into a splitter box and is then equally divided between two parallel secondary clarifiers. The splitter box contains a manual bar screen for additional solids removal before the wastewater enters the clarifiers. Metal rectangular weirs are used in the clarifiers. The weirs and clarifiers are showing their age with some fingers missing and short circuiting occurring, which allows some solids and floatables to pass through this stage to the disinfection unit. Return Activated Sludge (RAS) from the clarifiers is continuously returned to the aeration basin at the corner opposite from the grit chamber.

The effluent enters a chlorine contact chamber that consists of two parallel rectangular concrete basins. There is approximately 45 minutes of contact time in each basin. The plant uses water to spray down their contact chamber in order to keep the scum down. Disinfected wastewater is dechlorinated with sulfur dioxide gas in a basin following the chlorine chamber. Both gas tanks for chlorine and sulfur dioxide are equipped with an automatic switchover device to ensure there are no lapses in chemical feed, quantities are set to uniform rates.

Dechlorinated effluent flows through a 9" Parshall flume where flow is measured by an ultrasonic totalizer meter. Effluent is then discharged through outfall 001 to the Rio Grande. Rip-rap has been installed directly below the outfall pipe to increase aeration and reduce bank erosion. At certain times of the year, a portion of the effluent is diverted to an effluent reuse pond for land application on city parks and the municipal golf course. This effluent flow is metered and subtracted from the daily flows.

The planned Phase I Construction scheduled to begin this month include: renovating the headworks, influent flow meter, VFD, and mechanical bar screen; replacing the power brush rotors in the aeration basin with bubble diffusers; upgrading to an ultraviolet light disinfection system; incorporating a belt filter press to dry solids; and upgrading the SCADA system. Phase 2A will replace the circular clarifiers, phase 2B will replace the digester basin, and rehabilitate the oxidation oval and emergency overflow pond.

SLUDGE:
Waste activated sludge (WAS) from the clarifiers is sent to two vacuum assisted drying beds where a cationic polymer is added and liquid is drawn through the porous blocks that make up the beds. Solids stay on top of the blocks and recovered liquid is returned to the headworks. Sludge is then removed and stockpiled on concrete drying beds and spread out for further drying. Class A is achieved by meeting the temperature requirements for pathogen reduction and the percent solids requirement for vector attraction reduction. The Class A material is made available free to the public and applied to city parks and golf course.

Section A – Permit Verification – Overall Rating of "Satisfactory"

The permit requires, in Part III, Section D.1. Planned Changes:

b. MUNICIPAL PERMITS Any change in the facility discharge (including the introduction of any new source or significant discharge or significant changes in the quantity or quality of existing discharges of pollutants) must be reported to the permitting authority. In no case are any new connections, increased flows, or significant changes in influent quality permitted that will cause violation of the effluent limitations specified herein.

Comments for Permit Verification:

- Upgrades scheduled to begin in the next month will include a 23% increase in capacity to a 1.3 MGD design flow. The permit application submitted in 2013 included information with the existing 1.06 MGD design flow. The EPA permit writer should be notified by the facility that the application is outdated and an amendment submitted if necessary.

Section B – Recordkeeping and Reporting Evaluation – Overall Rating of "Satisfactory"

The permit requires, in Part I, Section C. Monitoring and Reporting:

Monitoring information shall be on Discharge Monitoring Report Form(s) EPA 3320-1 as specified in Part III.D.4 of this permit and shall be submitted monthly.

The permit requires, in Part II, Section B. Minimum Quantification Level (MQL):

If any individual analytical test result is less than the minimum quantification level listed in Appendix A, a value of zero (0) may be used for that individual result for the Discharge Monitoring Report (DMR) calculations and reporting requirements.

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.

Comments for Recordkeeping and Reporting:

- A letter was sent by EPA to the facility on March 11, 2016 noting that copper was not reported on June 2015 DMR. The facility responded with a corrected report on March 22, 2016.
- The permit requires testing for Total Residual Chlorine (TRC) five times a week when chlorine is being used. The chlorine meter in use displays sample measurements in (mg/l). The reporting requirement in the permit is in (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 in the permit is 33(µg/L). When using this meter any value less than

0.04 (mg/L) can be recorded as 0.0 on the DMR report. All other measurements must be converted to (ug/l) and reported on the DMR.

Findings for Recordkeeping and Reporting:

- Standard method used for measuring pH was not noted on the bench sheet.
- Sample thermometers are calibrated quarterly but no records are maintained. Thermometer used for calibration had proper records.

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 "Marginal"

The permit requires, in Part III.B.3 Proper Operation and Maintenance) of the 2010 and 2015 Permits state:

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.

Comments for Operations and Maintenance:

- Emergency generators must be manually started, this is scheduled to be upgraded in Phase 1.
- The influent flow meter has not been used for many years as it is very difficult to safely use. A new influent flow meter will be installed with the Phase 1 upgrades.
- Facility is currently adequately staffed with certified operators, but may be losing one of their certified operators in the near future.

Findings for Operations and Maintenance: Currently effluent is within limits. However:

- The automated bar screen (photo 2) and grit separator are both being bypassed due to equipment issues.
- The facility has a lined emergency overflow pond (photo 3). The liner appeared to have some damage near the inflow pipe and may not contain all fluids if used for emergency overflow before it is replaced as part of Phase 2B upgrades.
- Many teeth on the clarifier weirs are broken (photo 5) allowing some floatables to get past the system. The teeth had been replaced two years ago and are planned to be replaced with fiberglass teeth.
- March 13, 2016 the headworks VFD stopped operating and the SCADA system did not alarm, resulting in a sewage back up out of a manhole. The spill did not reach a watercourse and was cleaned up and reported.

Section F - Laboratory - Overall rating of "Satisfactory"

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.

As noted in NPDES Reporting Requirements Handbook, Section H.3, Calculating Fecal Coliform Geometric Mean:

Fecal coliform bacteria daily average is the geometric mean of the fecal coliform samples collected in a calendar month.

nth Root The geometric mean can be calculated as the nth root of the product of n data points. In this case, n is the number of fecal coliform bacteria sample results. Geometric Mean = $\sqrt[n]{X_1X_2X_3X_4X_5...X_n}$

For example, if five fecal coliform bacteria samples are taken and the samples results are 99, 126, 90, 420, and 2200 colonies/mL, the calculated geometric mean is 253. $\sqrt[5]{(99)(126)(90)(420)(2200)} = 253$

Findings for Laboratory:

- E.coli is currently being calculated as an arithmetic mean, not as a geometric mean as required.
- Duplicate and spike samples are not being submitted.

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Google Earth	Date: 4/1/16	Time: n/a
City/County: Truth or Consequences/Sierra Co.		State: New Mexico
Location: Truth or Consequences Wastewater Treatment Plant		
Subject: overview		

NMED/SWQB Official Photograph Log Photo # 2		
Photographer: D. Valenta	Date: 5/12/16	Time: 12:56pm
City/County: Truth or Consequences/Sierra Co.		State: New Mexico
Location: Truth or Consequences Wastewater Treatment Plant		
Subject: manual bar screen		

NMED/SWQB Official Photograph Log Photo #3		
Photographer: D. Valenta	Date: 5/12/16	Time: 1:04pm
City/County: Truth or Consequences/Sierra Co.		State: New Mexico
Location: Truth or Consequences Wastewater Treatment Plant		
Subject: Emergency overflow pond, gravel missing near outfall pipe (hole not visible in this photo) and possible damage in other areas.		

NMED/SWQB Official Photograph Log Photo #4		
Photographer: D. Valenta	Date: 5/12/16	Time: 1:07pm
City/County: Truth or Consequences/Sierra Co.		State: New Mexico
Location: Truth or Consequences Wastewater Treatment Plant		
Subject: Rotors in oxidation oval		

NMED/SWQB Official Photograph Log Photo # 5		
Photographer: D. Valenta	Date: 5/12/16	Time: 1:20pm
City/County: Truth or Consequences/Sierra Co.		State: New Mexico
Location: Truth or Consequences Wastewater Treatment Plant		
Subject: broken teeth on clarifier		

NMED/SWQB Official Photograph Log Photo # 6		
Photographer: D. Valenta	Date: 5/12/16	Time: 1:28pm
City/County: Truth or Consequences/Sierra Co.		State: New Mexico
Location: Truth or Consequences Wastewater Treatment Plant		
Subject: chlorine contact chamber		

NMED/SWQB Official Photograph Log Photo # 7		
Photographer: D. Valenta	Date: 5/12/16	Time: 1:46pm
City/County: Truth or Consequences/Sierra Co.		State: New Mexico
Location: Truth or Consequences Wastewater Treatment Plant		
Subject: Fish in river at outfall 001