



SUSANA MARTINEZ  
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JOHN A. SANCHEZ  
Lieutenant Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN  
Cabinet Secretary

BUTCH TONGATE  
Deputy Secretary

### Certified Mail - Return Receipt Requested

September 2, 2014

Mr. Doug Powers,  
City Manager  
City of Tucumcari  
215 East Center Street  
Tucumcari, NM 88401

**Re: City of Tucumcari Waste Water Treatment Plant; Major; Municipal; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES Permit NM0020711; July 21, 2014**

Dear Mr. Powers:

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 Barbara Cooney at (505) 827-0212 or at [barbara.cooney@state.nm.us](mailto:barbara.cooney@state.nm.us).

Sincerely,

*/S/ Bruce J. Yurdin*

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

cc: Mr. Chuck Krause, Tucumcari Mountain Cheese Factory  
Rashida Bowlin, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Raquel Douglas, USEPA (6EN-WM) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN) by e-mail  
Robert Italiano, NMED District II, by e-mail



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

### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1   N   2   5   3   N   M   0   0   2   0   7   1   1   11   12   1   4   0   7   2   1   17   18   C   19   S   20   1					
Remarks					
T   U   C   U   M   C   A   R   I   W   W   T   P   M   A   J   O   R					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67       1   69	70   3	71   N	72   N	73	74   75   M   A   J   O   R   80

#### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>Tucumcari Wastewater Treatment Plant – North on 1<sup>st</sup> St., cross over RR tracks, 0.4 miles to Maple St., turn right onto Maple, left onto Rock Island to WWTP.</b>  Quay County	Entry Time /Date 11:50 Hours / 21 July 2014	Permit Effective Date <b>February 1, 2008</b>
	Exit Time/Date 17:10 Hours / 21 July 2014	Permit Expiration Date <b>January 31, 2013</b> EPA – administratively extended
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  Calvin Henson, Superintendent 575-461-4542  Janet Garcia, Laboratory Analyst 575-461-4372	Other Facility Data  Latitude N 35° 11' 48.90" Longitude W 103° 43' 04.94"  SIC 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number  Mr. Doug Powers, 215 East Center St., Tucumcari, NM 88401/ City Manager/ 575-461-3451, fax 575-461-2049	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

#### Section C: Areas Evaluated During Inspection

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

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

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

As part of the inspection a site visit was made to the Tucumcari Mountain Cheese Factory, located at 823 E. Main Street /Tucumcari, NM 88401/ Phone number 575-461-4045 Owner/Operator Mr. Chuck Krause. This business is a significant contributor to the domestic waste collection system and wastewater being treated at the Tucumcari Wastewater Treatment Plant.

See the Further Explanations Section of the report for details.

Name(s) and Signature(s) of Inspector(s) /S/ Barbara Cooney	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212 / 505-827-0160	Date 2 Sept 2014
Signature of Management QA Reviewer /S/ Shelly Lemon	Agency/Office/Phone and Fax Numbers 505-827-2819 / 505-827-0160	Date 9-2-2014

## SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

 S  M  U  NA (FURTHER EXPLANATION ATTACHED Yes)

DETAILS: EPA has administratively extended this expired permit. The permittee did not provide notification to EPA and the State about increase in waste received from the Cheese Factory)

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

(No notification made to EPA and State for receiving waste from Cheese Factory)

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: There are no records of the volume and the quality of waste entering the system from the Tucumcari Mountain Cheese Factory as required in Part II of the permit; Some DMR reports not received by NMED and/or EPA.

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.

 Y  N  NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.

 S  M  U  NA

a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING

 Y  N  NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING

 Y  N  NA

c) ANALYTICAL METHODS AND TECHNIQUES.

 Y  N  NA

d) RESULTS OF ANALYSES AND CALIBRATIONS.

 Y  N  NA

e) DATES AND TIMES OF ANALYSES.

 Y  N  NA

f) NAME OF PERSON(S) PERFORMING ANALYSES.

 Y  N  NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.

 S  M  U  NA

4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.

 S  M  U  NA

5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.

 Y  N  NA

## SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

 S  M  U  NA (FURTHER EXPLANATION ATTACHED Yes)

DETAILS: The permittee is not managing nor controlling the influent waste from the Tucumcari Mountain Cheese Factory. This influent can be causing interference with the proper operations of the WWTP.

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 Yes.)

DETAILS:

There are no records of the volume and the quality of waste entering the system from the Tucumcari Mountain Cheese Factory as required in Part II of the permit. This is the reason for the Unsatisfactory rating for this section.

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.  
TYPE OF DEVICE Y  N  NA

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.

 Y  N  NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Staff gauge is not affixed to flume.

 Y  N  NA4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION Unknown) 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  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. 8 % OF THE TIME. Once a year as part of the DMR-QA study  Y  N  NA
- 7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Bio Aquatics  
 2501 Mayes Rd. Ste. 100  
 LAB ADDRESS Carrollton, TX 75006  
 PARAMETERS PERFORMED WET Test

**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	None	None	None	None	Clear	

RECEIVING WATER OBSERVATIONS  
 Effluent Exceedence and WET Test Failures – See Further Explanation Section of the Report

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No).  
 DETAILS:

- 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.  S  M  U  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: Composted for town and domestic use (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

**SECTION I - SAMPLING INSPECTION PROCEDURES** (FURTHER EXPLANATION ATTACHED No).

- 1. SAMPLES OBTAINED THIS INSPECTION.  Y  N  NA
- 2. TYPE OF SAMPLE OBTAINED  
 GRAB \_\_\_\_\_ COMPOSITE SAMPLE \_\_\_\_\_ METHOD \_\_\_\_\_ FREQUENCY \_\_\_\_\_
- 3. SAMPLES PRESERVED.  Y  N  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

## **City of Tucumcari Wastewater Treatment Plant**

Compliance Evaluation Inspection  
NPDES Permit Number NM0020711

July 21, 2014

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### **Introduction**

On July 21, 2014 a Compliance Evaluation Inspection was conducted at the City of Tucumcari Waste Water Treatment Plant (WWTP) by Barbara Cooney and Shelly Lemon, of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB), Point Source Regulation Section (PSRS).

The inspection was conducted by NMED for the US Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. These inspections are conducted under contract with the USEPA and are used to evaluate compliance with the NPDES permit program. This inspection report is based on information supplied by the City of Tucumcari representatives (the permittee), observations made by the NMED Inspector, reports and records kept by the permittee and/or NMED and information provided by representative of the Tucumcari Mountain Cheese Factory.

The City of Tucumcari WWTP is classified as a major municipal discharger under the Federal Clean Water Act (CWA), section 402 National Pollutant Discharge Elimination System (NPDES) permit program, and is assigned permit number NM0020711. The Standard Industrial Classification Code (SIC) is 4952. Effluent flows through an underground pipe for approximately 2.0 miles to Breen's pond. Overflow from the pond is discharged to No Name Creek and travels approximately one mile to Pajarito Creek, a perennial tributary to the Canadian River in Water Quality Segment 20.6.4.303. The designated uses are irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

### **Inspection Details**

The inspectors arrived at the WWTP at 11:15 hours on July 21, 2014, showed credentials, and discussed the purpose of the inspection with Mr. Calvin Henson, Water and Wastewater Superintendent and Janet Garcia, Laboratory Analyst. A site visit was also made to the Tucumcari Mountain Cheese Factory from 13:00 to 13:50 hours, where inspectors met with Owners, Mr. Chuck Krause and Ms. Krause. Inspectors and City of Tucumcari representatives also made a site visit to Breen's Pond. An exit interview was conducted with Mr. Doug Powers, City Manager, Mr. Henson and Ms. Garcia. Inspectors left the City facilities at 17:10 hours.

### **Treatment Units (Historic & Present)**

There are eleven lift stations within the City's collection system that deliver wastewater to the WWTP. Each lift station has two pumps. Movable pumps are available for back-up if lift stations fail. Alarms are located at four of the eleven lift stations and are sounded in the event of an overflow. Two portable generators are available at the WWTP to provide power for the lift station pumps in the event of a power outage. The City also accepts industrial waste into the collection system from the Tucumcari Mountain Cheese Factory, motels, restaurants, gas stations, and laundromats. Influent from domestic and industrial sources enters the headworks where it passes through a fine mesh bar screen and aerated grit chamber equipped with an influent wet-well lift station that houses three 25-hp Flygt submersible pumps with variable frequency drives.

## **City of Tucumcari Wastewater Treatment Plant**

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The previous WWTP was built in 1982 and was a fixed media biological treatment system consisting of large solids removal at the headworks, primary clarification, trickling filters followed by a series of Rotating Biological Chambers (RBCs), secondary clarification, chlorine disinfection, and de-chlorination. The plant treatment works were badly worn and in need of constant repair. Several plant failures resulted in the discharge of effluent exceeding NPDES permit limits and at least one catastrophic failure resulted in the release of up to 300,000 gallons of untreated sewage in 2007. The City of Tucumcari received an Administrative Order CWA-06-2011-1764, from the USEPA on 5-10-2011 for Effluent Exceedences of the NPDES permit.

The City contracted with an engineering firm to update the facility and improve the water quality of the discharge. Construction was completed in the fall of 2011. At the same time, the City of Tucumcari also collaborated with New Mexico State University's Tucumcari Science Center to construct a water reuse storage pond, pump station, and pipeline for a water conservation and reuse project at the research facility.

The new Tucumcari WWTP is a Medium Rate Activated Sludge facility (MRAS). This system is a conventional activated sludge process that may also incorporate biological nutrient removal. The improvements at the WWTP are extensive and include upgrades to the headworks, new splitter boxes, rehabilitation of the primary clarifiers, new MRAS basins, secondary clarifiers, UV disinfection, a blower/pump building, sludge drying and composting pads, and a new laboratory and administration building. Rehabilitation of the anaerobic and aerobic sludge digesters, include replacement of the floating roof with a fixed roof over the anaerobic digester and reinforcement/repairs to the concrete structures.

The MRAS plant has a capacity of 1.2 MGD with an average daily flow of 0.48 MGD (the current, extended permit is based on 0.92 MGD). The current NPDES permit expired on January 31, 2013. The USEPA administratively extended this permit.

### **Sludge**

Following anaerobic then aerobic digestion and dewatering, solids are composted on site and given free of charge to local users. Grit and larger solids removed from the headworks are sent to the county landfill after passing the paint filter test.

### **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. A section for Pre Treatment is included in this report following Sludge Handling.

## **Section A – Permit Verification – Overall Rating of “Marginal”**

### **Permit Requirements for Permit Verification**

The permit requires in Part III. D. Reporting Requirements:

#### *1. PLANNED CHANGES*

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*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 exiting 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.*

**Findings for Permit Verification**

1. EPA has administratively extended this expired permit.
  
2. The permittee did not provide notification to EPA and the State about increase in waste received from the Tucumcari Mountain Cheese Factory. This is the reason for the Marginal rating for this section.

**Section B – Record Keeping and Reporting – Overall Rating of “Marginal”**

**Permit Requirements for Record Keeping and Reporting**

The permit states in Part III. D. Reporting Requirements:

*4. Discharge Monitoring Reports and other Reports*

*Monitoring results must be reported on Discharge Monitoring Report (DMR) Form EPA No. 3320-1 in accordance with the “General Instructions” provided on the form. The permittee shall submit the original DMR signed and certified as required in Part III.D. II and all other reports required by Part III.D. to the EPA at the address below. Duplicate copies of DMR’s and all other reports shall be submitted to the State agency (ies) at the following address (es):*

*EPA:*

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

*New Mexico:*

*Program Manager  
Surface Water Quality Bureau  
New Mexico Environment Department  
P.O. Box 26110  
1190 Saint Frances Drive  
Santa Fe, NM 87502*

The permit states in Part III. D. Reporting Requirements:

*1. PLANNED CHANGES*

**City of Tucumcari Wastewater Treatment Plant**  
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*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.*

**Findings for Record Keeping and Reporting**

1. Records were reviewed for the period of the first quarter 2014.
- 2... The US EPA is encouraging permittees to transition to the Net DMR paperless reporting system. Information may be found at the website: <http://www.epa.gov/netdmr/>
3. The permittee did not notify EPA and NMED about increases and changes to the influent waste stream from the Tucumcari Mountain Cheese Factory. This is the primary reason for the Marginal rating for this section.
4. DMRs have not been received by NMED nor by EPA for the month of November 2013. The EPA Net DMR system notes that DMRs have not been received for the month of May 2014. NMED records shows that DMRs for that month have been received. It is suggested that the permittee contact the EPA to clarify this discrepancy.

**Section C - Operation and Maintenance – Overall Rating of “Unsatisfactory”**

**Permit Requirements for Operation and Maintenance**

The permit requires, in Part III, Section B.3. , Proper Operation and Maintenance:

*a. The permittee shall at all times properly operate and maintain all facilities and system 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...*

**5. UPSET CONDITIONS**

**a. EFFECT OF AN UPSET**

*An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of Part III.B.5.b. are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.*

**b. CONDITIONS NECESSARY FOR A DEMONSTRATION OF UPSET**

*A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:*

*(1) An upset occurred and that the permittee can identify the cause(s) of the upset;*

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- (2) *The permitted facility was at the time being properly operated;*
- (3) *The permittee submitted notice of the upset as required by Part III.D.7; and,*
- (4) *The permittee complied with any remedial measures required by Part III.B.2.*

**Findings for Operation and Maintenance**

During the site visit and the records review of the WWTP, the following observations were made:

1. Coating of white material on the surface of the primary clarifier.
2. No monitoring of influent flow from industrial contributors.
3. Flow Measurement –The effluent Parshall Flume does not have a fixed staff gauge. Operators are using a hand held ruler to take back up flow readings. The ultrasonic meter is checked monthly against the hand held ruler. It is advisable for the permittee to work with an engineer to install a fixed staff gauge and to develop conversions from the depth of the head to million gallons per day.
4. Inadequate staffing. The permittee currently has some vacant operator positions. Recommended staff levels can be found through the NMED Utility Operators Certification Program at: <http://www.nmenv.state.nm.us/swqb/UOCP/>
5. Cheese Factory - The permittee is advised, that this additional influent waste stream to the WWTP should be monitored closely. They are required in the permit to reject any waste that could potentially cause harm to or interfere with the treatment process. It is advisable for the city to adopt local limits for the collection system and industrial contributors. Additionally a sanitary sewer survey of contributors could also assist in protecting the function of the WWTP and the effectiveness of the treatment process.

Information on the local limits and sewer survey can be found at the EPA website for Pretreatment at

<http://water.epa.gov/polwaste/npdes/pretreatment/index.cfm>

and

<http://www.nmcpr.state.nm.us/nmac/parts/title20/20.007.0004.htm>

**Section D – Self Monitoring – Overall Rating of “Unsatisfactory”**

**Permit Requirements for Self Monitoring**

The permit requires in Part 1. C. Monitoring and Reporting:

*1. Monitoring and Reporting*

- a. The permittee shall effectively monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the treated discharge.*

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**Findings for Self Monitoring**

1. The permittee is not monitoring the volume and content of the pollutants entering the collection system from the contributing industry, The Tucumcari Mountain Cheese Factory nor from other potential industrial contributors, such as gas stations, motels and laundromats. This is the reason for the Unsatisfactory rating.
  
2. A review of facility record shows the permittee is conducting the sampling and monitoring on the effluent as required.

**Section E – Flow Measurements – Overall Rating of “Marginal”**

**Permit Requirements for Flow Measurements**

*The permit requires in Part III 5. MONITORING PROCEDURES*

**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 Measurements**

1. Flow Measurement –The effluent Parshall Flume does not have an affixed staff gauge. Operators are using a hand held ruler to take backup flow readings. The ultrasonic meter is checked monthly against the hand held ruler. It is advisable for the permittee to work with an engineer to install a fixed staff gauge and to develop conversions from the depth of the head to million gallons per day. This finding is also noted in the section above for Operation and Maintenance.

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

**Permit Requirements for Laboratory**

The permit requires, in Part III, Section B.3. , Proper Operation and Maintenance

*a. ...Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures...*

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

*a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in the permit or approved by the Regional Administrator.*

**Findings for Laboratory**

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1. The laboratory was inspected and records were reviews for the month of March 2014. There were no adverse findings.
2. The permittee is collecting samples and analyzing them for Total Nitrogen and Total Phosphorous for operational and engineering purposes. These are not permit requirement. The methods being used are not EPA or NMED approved for these pollutants. Even though these are not reported for the current NPDES permit, it is suggested the permittee use EPA and NMED approved methods for these analyses.

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

**Permit Requirements for Effluent / Receiving Waters**

1. Final Effluent limits – 0.92 MGD design flow  
 During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from outfall serial number 001. Such discharges shall be limited and monitored by the permittee as specified below

<u>Effluent Characteristics</u>	<u>Discharge Limitations</u>				<u>Monitoring Requirements</u>	
	<i>Mass (lbs/day, unless otherwise specified)</i>		<i>Concentration (mg/l, unless otherwise specified)</i>		<i>Frequency</i>	<i>Sample Type</i>
	<i>30-Day Avg.</i>	<i>7-Day Avg.</i>	<i>30-Day Avg.</i>	<i>7-Day Avg.</i>		
<i>Flow<sup>(1)</sup> STORET: 50050</i>	<i>Report</i>	<i>Report</i>	<i>N/A</i>	<i>N/A</i>	<i>Daily</i>	<i>Totalizing Meter</i>
<i>Biochemical Oxygen Demand (BOD<sub>5</sub>) STORET:00310</i>	<i>230</i>	<i>345</i>	<i>30</i>	<i>45</i>	<i>One/Week</i>	<i>6-hr Composite</i>
<i>Total Suspended Solids (TSS) STORET:</i>	<i>230</i>	<i>345</i>	<i>30</i>	<i>45</i>	<i>One/Week</i>	<i>6-hr Composite</i>
<i>Total Residual Chlorine<sup>(2)</sup> (TRC) STORET: 50060</i>	<i>N/A</i>	<i>N/A</i>	<i>11 ug/l<sup>(2)</sup></i>		<i>One/Day</i>	<i>Grab</i>
<i>E. coli<sup>(3)</sup> STORET: 51040</i>	<i>N/A</i>	<i>N/A</i>	<i>126<sup>(3)</sup></i>	<i>410<sup>(3)</sup> (Daily Max)</i>	<i>One/Week</i>	<i>Grab</i>
<i>pH<sup>(4)</sup> STORET: 00400</i>	<i>N/A</i>	<i>N/A</i>	<i>6.6 s.u. Minimum</i>	<i>9.0 s.u. Maximum</i>	<i>One/Week</i>	<i>Grab</i>

<u>EFFLUENT CHARACTERISTICS</u>	<u>DISCHARGE MONITORING</u>		<u>MONITORING REQUIREMENTS</u>	
<i>WHOLE EFFLUENT TOXICITY TESTING (7-Day Static Renewal)<sup>(5)</sup></i>	<i>30-DAY AVG MINIMUM</i>	<i>48-HR MINIMUM</i>	<i>MEASUREMENT FREQUENCY</i>	<i>SAMPLE TYPE</i>
<i>Ceriodaphnia dubia</i>	<i>Report</i>	<i>Report</i>	<i>Once/Quarter<sup>(0)</sup></i>	<i>6-hr</i>
<i>Pimephales promelas</i>	<i>Report</i>	<i>Report</i>	<i>Once/Quarter<sup>(0)</sup></i>	<i>6-hr</i>

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*FOOTNOTES:*

- 1 *Report monthly average and daily maximum as million gallons per day (MGD) by instantaneous measurement.*
- 2 *The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes.*
- 3 *Colonies/100 ml.*
- 4 *Standard unit.*
- 5 *See Part II.E., Whole Effluent Toxicity Testing Requirements for additional WET monitoring and reporting conditions.*
- 6 *Once/quarter for the first four quarters. If all tests pass, reduce the frequency to once/6-months for Ceriodaphnia dubia and to once/year for Pimephales promelas. If fails any test, frequency returns to once/quarter for the remainder of the permit term. Frequency reverts to once/quarter on the last day of the permit.*

**Finding for Effluent / Receiving Waters**

1. An effluent exceedence was reported on the DMRs for BOD - January 2013, 7 day average of 46 mg/L.
2. DMRs have not been received by NMED nor by EPA for the month of November 2013. The EPA Net DMR system notes that DMRs have not been received for the month of May 2014. NMED records shows that DMRs for that month have been received. It is suggested that the permittee contact the EPA to clarify this discrepancy (this is also noted in the section above for Record Keeping and Monitoring).
3. Whole Effluent Toxicity (WET) Test failures:  
Fourth Quarter 2012, October thru December  
First Quarter 2013, January thru March  
First Quarter 2014, January thru March

**Section H - Sludge Handling and Disposal - Overall Rating of “Satisfactory”**

**Section Addition – Pre Treatment – Overall Rating of “Unsatisfactory”**

**Permit Requirements for Pre Treatment**

The City of Tucumcari does not have a Pre Treatment program. The permit does however require that the city not allow pollutants that will interfere with the collection system and the WWTP treatment processes. The city has contributing industries including a cheese factory, restaurants, motels and laundromats. The inspectors visited one of these contributors, the Tucumcari Mountain Cheese Factory, a substantial contributor to the influent waste stream, as part of this inspection.

*The permit requires, in Part Part II C. CONTRIBUTING INDUSTRIES :*

1. *The following pollutants may not be introduced into the treatment facility:*

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- a. Pollutants which create a fire or explosion hazard in the publicly owned treatment works (POTW), including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;*
  - b. Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0, unless the works are specifically designed to accommodate such discharges;*
  - c. Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW, resulting in Interference;*
  - d. Any pollutant, including oxygen demanding pollutants (e.g., BOD), released in a discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW;*
  - e. Heat in amounts which will inhibit biological activity in the POTW resulting in Interference but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40 degrees Centigrade (104 degrees Fahrenheit) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits;*
  - f. Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;*
  - g. Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems; and*
  - h. Any trucked or hauled pollutants, except at discharge points designated by the POTW.*
- 2. The permittee shall require any indirect discharger to the treatment works to comply with the reporting requirements of Sections 204(b), 307, and 308 of the Act, including any requirements established under 40 CFR Part 403.*
  - 3. The permittee shall provide adequate notice of the following:*
    - a. Any new introduction of pollutants into the treatment works from an indirect discharger which would be subject to Sections 301 and 306 of the Act if it were directly discharging those pollutants; and*
    - b. Any substantial change in the volume or character of pollutants being introduced into the treatment works by a source introducing pollutants into the treatment works at the time of issuance of the permit.*
- Any notice shall include information on (i) the quality and quantity of effluent to be introduced into the treatment works, and (ii) any anticipated impact of the change on the*

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*quality or quantity of effluent to be discharged from the POTW.*

**Findings for Pre Treatment**

A site visit was made to the Tucumcari Mountain Cheese Factory from 13:00 to 13:50 hours, where inspectors met with Owners, Mr. Chuck Krause and Ms. Sylvia Krause. During the site visit inspectors observed a combination of 7 floor drains and sinks with drains that flow to the City of Tucumcari WWTP collection system (see attached photos # 25 through # 44). Inspectors also observed onsite chemical storage and records of Material Safety Data Sheets (MSDS) made available by the facility representatives. Also observed during the site visit, were storm drainage areas around the property.

1. There are no operational controls beyond the drain covers for any liquid and solids waste going down the drains. There is no treatment of waste going down the drains. Mr. Krause discussed adjusting for pH in the future. The facility does pH adjustment as part of the feta cheese manufacturing process, however there is no additional adjustment to waste that leaves the factory.
2. There are no flow measurement devices to monitor nor determine the volume of waste going down the drains.
3. There is no chemical monitoring for waste going down the drain.
4. There is no control for the volume of waste going down the drains so potentially large amounts of waste can reach the collection system and the WWTP causing shock effects to the biological and mechanical waste removal processes in the treatment works.
5. The city does not monitor the waste content and volume. Nor does the city limit the waste volume and content.
6. Chemical storage is in areas where open drains are present and without secondary containment.
7. The City has records of water used from the Drinking Water use meters, but does not account for any volume of milk and other substances used in this facility.

**The following information is arranged in the same format as the EPA Pre Treatment Site Visit form.**

**Name of Facility for site visit:**

Tucumcari Mountain Cheese Factory

**Location in Town:**

823 E. Main Street /Tucumcari, NM 88401/ Phone number 575-461-4045

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**Facility Produces:**

Feta Cheese – 20,000 pounds to 23,000 pounds of cheese are processed daily according to factory representatives. The factory is in production six days a week. This business has been in operation at this location for 19 years; has recently increased production and plans additional expansion in the future.

**Treatment processes in place to prevent undesirable discharge to collection system:**

None observed. Solids and Whey are sent to a facility in Clovis, New Mexico for processing.

**Facility Classification SIC:**

2022

According to the US Department of Labor this code applies:

Industry Group 202: Dairy Products

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**2022 Natural, Processed, and Imitation Cheese**

Establishments primarily engaged in manufacturing natural cheese (except cottage cheese), processed cheese, cheese foods, cheese spreads, and cheese analogs (imitations and substitutes). These establishments also produce by-products, such as raw liquid whey. Establishments primarily engaged in manufacturing cottage cheese are classified in Industry 2026, and those manufacturing cheese-based salad dressings are classified in Industry 2035.

Cheese analogs

Cheese products, imitation or substitutes

Cheese spreads, pastes, and cheese-like preparations

Cheese, except cottage cheese

Cheese, imitation or substitutes

Cheese, processed

Dips, cheese-based

Processed cheese

Sandwich spreads, cheese

Whey, raw: liquid

**Facility Operations:**

Feta Cheese processing.

**Flow Changes:**

Flows are not monitored.

**Process Changes:**

The facility increased production in the last year and has plans for additional expansion in the future.

**Raw Materials Used:**

Dairy Milk.

**Source Water:**

City of Tucumcari Water

**City of Tucumcari Wastewater Treatment Plant**

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**Chemicals (Hazardous Materials) On Site and discharged:**

A complete chemical list was not compiled during this site visit. The following chemicals were observed on site, and in records provided by the facility owners:

Milk products, Phosphoric Acid, Sulfuric Acid, Sodium Hypochlorite, Caustic Solution, Cleaning Products, including "Diton B" a chlorinated "Divos 110" Alkaline detergent, Liquid Caustic Detergent, cleaner and "Dibac" liquid bleach sanitizer, deodorizing cleaning additive and fogging sanitizer.

**Water Waste – Discharges to WWTP:**

A full inventory of products used, was not made during this site visit. This is a list of what was observed:

Milk products, Phosphoric Acid, Sodium Hypochlorite, Sulfuric Acid, Caustic Solution, Cleaning Products, including "Diton B" a chlorinated, "Divos 110" Alkaline detergent, Liquid Caustic Detergent, cleaner and "Dibac" liquid bleach sanitizer, deodorizing cleaning additive and fogging sanitizer.

Wastewater volumes and quality are not monitored by Tucumcari Mountain Cheese Factory nor by the City of Tucumcari so actual waste conditions being delivered to the WWTP are unknown.

NMED/SWQB  
Official Photograph Log  
Photo # 1

Photographer: B. Cooney

Date: 21 July 2014

Time: 11:43 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Headworks grit removal.



NMED/SWQB  
Official Photograph Log  
Photo # 2

Photographer: B. Cooney

Date: 21 July 2014

Time: 11:53 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Headworks large solids removal system.



NMED/SWQB  
Official Photograph Log  
Photo #3

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:16 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Primary Clarifier Weirs were level and no short circuiting was observed.



NMED/SWQB  
Official Photograph Log  
Photo #4

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:15 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Primary Clarifier has a coating of white milk products floating on the surface.



NMED/SWQB  
Official Photograph Log  
Photo # 5

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:18

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Past the primary clarifiers - a splitter box allows the flow to be sent to the two basins for Medium Rate Activated Sludge (MRAS) treatment.



NMED/SWQB  
Official Photograph Log  
Photo # 6

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:16 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Medium Rate Activated Sludge (MRAS) treatment – aeration basin. The south unit is in operation.



NMED/SWQB  
Official Photograph Log  
Photo # 7

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:19 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Medium Rate Activated Sludge (MRAS) treatment – aeration basin. The north unit is not in operation because the volume of wastewater does not necessitate its use. A small amount of treated effluent is kept in the basins to protect the treatment works. The bubble patterns seen show the air diffusers locations.



NMED/SWQB  
Official Photograph Log  
Photo # 8

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:21 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Medium Rate Activated Sludge (MRAS) treatment – aeration basin.



NMED/SWQB  
Official Photograph Log  
Photo # 9

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:25 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Secondary Clarifier. There is an excessive amount of floating cheese waste products in the basin. The scraper arm does capture most so it is not being discharged.



NMED/SWQB  
Official Photograph Log  
Photo # 10

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:33 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: The anaerobic sludge digester. Repairs have been made to the original unit, including converting the floating roof to a fixed roof. Also repairs to the concrete have been made.



NMED/SWQB  
Official Photograph Log  
Photo # 11

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:34 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Aerobic solids digestion follows the anaerobic sludge digester.



NMED/SWQB  
Official Photograph Log  
Photo # 12 & 13

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:36 Hours & 14:37

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Ultraviolet Disinfection Units. Chlorine is no longer the primary disinfection treatment process. There are two banks of 10 cartridges each.



NMED/SWQB  
Official Photograph Log  
Photo # 14

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:39 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Effluent flow meter. There is not an affixed staff gauge that is readable. Operators use a metal ruler to take readings as a backup check to the primary sensor.



NMED/SWQB  
Official Photograph Log  
Photo # 15

Photographer: B. Cooney

Date: 21 July 2014

Time: 14:41 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Effluent Sample location is at the Parshall flume. Flow weighted and grab samples are taken.





NMED/SWQB  
Official Photograph Log  
Photo # 18

Photographer: B. Cooney

Date: 21 July 2014

Time: 15:34 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Wastewater Treatment Plant

Subject: Dual reuse pumps send treated effluent to the New Mexico State Research Center approximately 2 miles east of the WWTP.



NMED/SWQB  
Official Photograph Log  
Photo # 19

Photographer: B. Cooney

Date: 21 July 2014

Time: 15:24 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Breen's Pond below Tucumcari WWTP

Subject: Tributary to Breen's Pond has riparian vegetation, distinctly different from the surround upland.



NMED/SWQB  
Official Photograph Log  
Photo # 20

Photographer: B. Cooney

Date: 21 July 2014

Time: 15:24 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Breen's Pond below Tucumcari WWTP

Subject: Tributary to Breen's Pond has riparian vegetation, distinctive from the upland and surrounding area.



NMED/SWQB  
Official Photograph Log  
Photo # 21

Photographer: B. Cooney

Date: 21 July 2014

Time: 15:14 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Breen's Pond below Tucumcari WWTP

Subject: Breen's Pond – the receiving water for the effluent from the Tucumcari WWTP. The outfall location to No Name Creek and the white piping is for diversion to irrigation.



NMED/SWQB  
Official Photograph Log  
Photo # 22

Photographer: B. Cooney

Date: 21 July 2014

Time: 15:14 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Breen's Pond below Tucumcari WWTP

Subject: Breen's Pond outfall Parshall Flume. A barrier was put into the flume to reduce discharge volumes and debris is also caught behind the barrier.



NMED/SWQB  
Official Photograph Log  
Photo # 23

Photographer: B. Cooney

Date: 21 July 2014

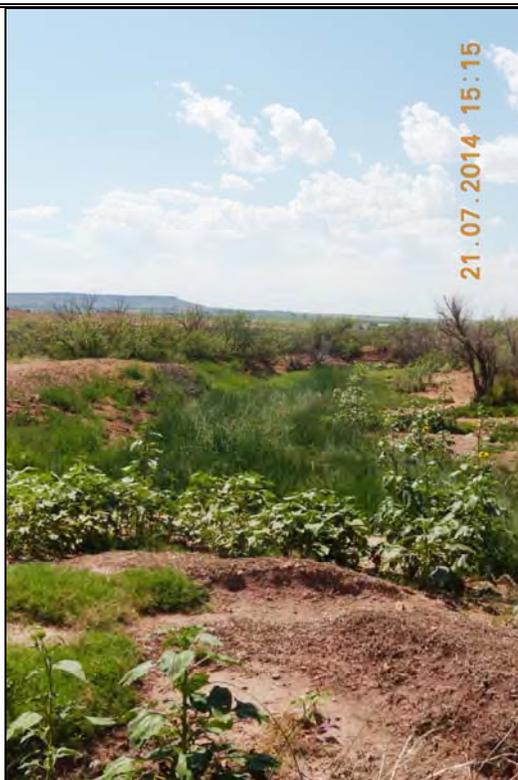
Time:

City/County: Tucumcari / Quay

State: New Mexico

Location: Breen's Pond below Tucumcari WWTP

Subject: No Name Creek below Breen's Pond outfall.



NMED/SWQB  
Official Photograph Log  
Photo # 24

Photographer: B. Cooney

Date: 21 July 2014

Time: 15:15 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Breen's Pond below Tucumcari WWTP

Subject: Breen's Pond outfall Parshall flume.



NMED/SWQB  
Official Photograph Log  
Photo # 25

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:02

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari, New Mexico, Rock Island Street

Subject: Manhole to the Tucumcari collection system below the Tucumcari Mountain Cheese Company.



NMED/SWQB  
Official Photograph Log  
Photo # 26

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:03

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari, New Mexico, Rock Island Street

Subject: Manhole to the Tucumcari collection system below the Tucumcari Mountain Cheese Factory. The factory is two blocks up the alley way.



NMED/SWQB  
Official Photograph Log  
Photo # 27

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:06

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari, New Mexico, Rock Island Street.

Subject: Manhole to the Tucumcari collection system below the Tucumcari Mountain Cheese Factory. The waste from the factory on the left is white with mild by products. It is mixing with the domestic waste coming from residences.



NMED/SWQB  
Official Photograph Log  
Photo # 28

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:10

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari, New Mexico

Subject: Tucumcari Mountain Cheese Factory. 823 E. Main / Tucumcari, NM 88401



NMED/SWQB  
Official Photograph Log  
Photo # 29

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:29

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Floor drain in the factory that goes to the City of Tucumcari WWTP collection system and eventually to the WWTP



NMED/SWQB  
Official Photograph Log  
Photo # 30

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:30

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Floor drain in the factory that goes to the City of Tucumcari WWTP collection system and eventually to the WWTP



NMED/SWQB  
Official Photograph Log  
Photo # 31

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:35 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Acid Chemical storage and use in an area with open floor drains that go to the City of Tucumcari WWTP collection system and eventually to the WWTP.



NMED/SWQB  
Official Photograph Log  
Photo # 32

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:35 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Pasteurizing System.



NMED/SWQB  
Official Photograph Log  
Photo # 33

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:36 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Chemical storage near the pasteurizing system. A floor drain is near the stored drums, that goes to the City of Tucumcari WWTP collection system and eventually to the WWTP.



NMED/SWQB  
Official Photograph Log  
Photo # 34

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:36 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Sink and drain that goes to the City of Tucumcari WWTP collection system and eventually to the WWTP.



NMED/SWQB  
Official Photograph Log  
Photo # 35

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:37 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Drain in the factory that goes to the City of Tucumcari WWTP collection system and eventually to the WWTP



NMED/SWQB  
Official Photograph Log  
Photo # 36

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:37 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Drain in the factory that goes to the City of Tucumcari WWTP collection system and eventually to the WWTP.



NMED/SWQB  
Official Photograph Log  
Photo # 37

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:59 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Sink and drain. Cleaning supplies are stored on the shelf to the right of the sink.



NMED/SWQB  
Official Photograph Log  
Photo # 38

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:38 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Caustic solution used in cleaning processes in the factory. The used chemicals are sent down the drain and eventually to the WWTP.



NMED/SWQB  
Official Photograph Log  
Photo # 39

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:38 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: The used chemicals are sent down the drain and eventually to the WWTP.



NMED/SWQB  
Official Photograph Log  
Photo # 40

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:39 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: The used chemicals are sent down the drain and eventually to the WWTP.



NMED/SWQB  
Official Photograph Log  
Photo # 41

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:44 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Alley drainage area from factory. The wet areas were a result of heavy rain fall. There is a potential for some drainage from the factory site to mix with rain water in this location.



NMED/SWQB  
Official Photograph Log  
Photo # 42

Photographer: B. Cooney

Date: 21 July 2014

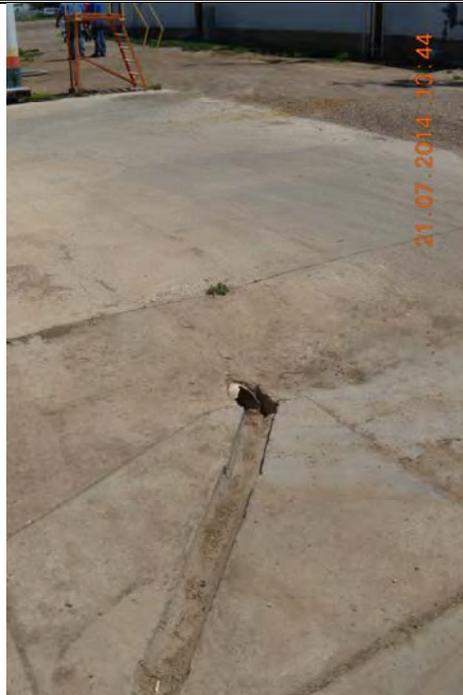
Time: 13:44 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Storm water drain on property.



NMED/SWQB  
Official Photograph Log  
Photo # 43

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:46 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Outside view of factory.



NMED/SWQB  
Official Photograph Log  
Photo # 44

Photographer: B. Cooney

Date: 21 July 2014

Time: 13:46 Hours

City/County: Tucumcari / Quay

State: New Mexico

Location: Tucumcari Mountain Cheese Factory

Subject: Storm water drain on property.



Attachments  
Comments from Permittee

Gladys Gooden-Jackson

EPA Region 6 (6EN-WC)

Water Enforcement Branch  
1445 Ross Avenue  
Dallas, TX 75020-2733



This letter is in response to Compliance Evaluation Inspection; NPDES Permit NM00020711

July 21, 2014.

The section E on flow measurement.

Calibration procedures and records are kept on site. The calibration records were not requested during the inspection. The staff gauge was not mounted at this time, but was the correct staff gauge for the effluent partial flume. A hand held ruler was not used to calibrate flows. The staff gauge is now mounted permanently.

The sludge process paragraph , page 2 of 12.

We have an anaerobic digester and sludge is transferred to a storage tank where supernatant is drained back to the head works and sludge is then pumped to the drying beds.

On page 5 of 12 Number of operators

We currently have 5 full time operators and have added 1 part time employee for weekends that started on May 3, 2014 to help operators and for safety of personnel on weekend duty.

On page 7 of 12.

We do total nitrogen and total phosphorous sampling for our ground water permit. The samples are sent to ASK Laboratories, Inc located in Amarillo ,TX. SEE attached lab results for methods used.

On page 8 of 12

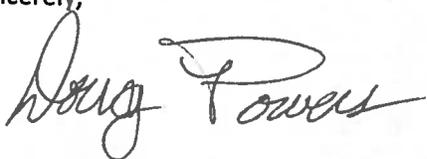
On the missing DMR's for NOV 2013 and MAY 2014, I have contacted EPA and sent missing DMR's to you and also the missing WET DMR's.

We are currently working with an engineering company to get a pretreatment ordinance created to help regulate the discharge of the cheese factory.

The city has helped the cheese factory acquire funds to help put a pretreatment process in place to control the discharge from the cheese factory.

Please contact me for any other information or comments you may have by calling me at (575) 461-3451.

Sincerely,

A handwritten signature in cursive script that reads "Doug Powers". The signature is written in black ink and is positioned below the word "Sincerely,".

Doug Powers  
City Manager, City of Tucumcari

Cc: NM Environment Department

Calvin Henson, Wastewater Superintendent

9-9-2014

Gladys Gooden-Jackson

Water Enforcement Branch  
1445 Ross Avenue  
Dallas, TX 75020-2733



This Letter is in response to Compliance Evaluation Inspection; NPDES Permit NM00020711.  
These are the lab results for nitrogen and phosphorous and the methods used by ASK Laboratories.  
I forgot to put them in with the original response letter.

Sincerely

A handwritten signature in black ink, appearing to read "Calvin Henson".

Calvin Henson  
Wastewater Superintendant

**ASK Laboratories, Inc.**

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T104704346-14-6

City of Tucumcari  
Work Order ID: 14-08-0058  
Date: 08/15/2014 09:27  
Page: 1 of 6

City of Tucumcari  
P.O. Box 1188  
Tucumcari, NM 88401  
Attn: Michael Rivera

Re: Project Name: City of Tucumcari WWTP

**Sample Cross Reference and Identification**

<u>Lab ID</u>	<u>Customer ID</u>	<u>Matrix</u>	<u>Collected</u>
14080058-001	WWTP Effluent Ground Water Permit DP-1700	Liquid	08/12/2014 09:51

**Sample(s) Received: 08/12/2014 12:56**

A handwritten signature in black ink, appearing to read 'Vincent R Barnes'.

Certified By  
Vincent R Barnes  
Quality Officer

The results provided with this report solely reflect the analysis of the samples provided. ASK Laboratories, Inc. is not responsible for the use or characterization of this data as representative for any sample or material not specifically analyzed by the laboratory or its subcontractors.

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T104704346-14-6

City of Tucumcari  
 Work Order ID: 14-08-0058  
 Date: 08/15/2014 09:27  
 Page: 2 of 6

**Analytical Report**

ASKLabs ID: 14080058-001

Customer ID: WWTP Effluent Ground Water Permit DP-1700

Sample Collected: 08/12/2014 09:51

Analyte	Run	Result	Flag	Units	MQL	SQL	FAC	Analyst	Analysis Date	QC Batch ID
Chloride	2	121	N1	mg/L	3.00	3.00	10	TDR	08/12/2014 12:00	IONC01-14-08-05
Nitrate as N	2	8.17		mg/L	2.50	1.20	10	TDR	08/12/2014 12:00	IONC01-14-08-05
Ammonia	1	1.90		mg/L	0.5	0.5	1	ORL	08/14/2014 11:00	WCPRB03-14-08-06
Total Kjeldhal Nitrogen as N	1	2.79		mg/L	0.5	0.5	1	ORL	08/14/2014 11:00	WCPRB02-14-08-05
Total Phosphorous as P	1	2.24	N1	mg/L	0.13	0.13	5	ORL	08/14/2014 12:30	WCSPC02-14-08-02

Analyte	Run	Result	Analyst	Analysis Date
TPhos Sample Preparation	1	NA	ORL	08/13/2014 16:00

**QC Summary**

**Blank and Laboratory Control Samples**

QC Batch ID:	Blank	LCS Conc	Units	LCS Results	LCS Recov	LCSD Results	LCSD Recov	RPD	Flags
IONC01-14-08-05	ND	5.0	mg/L	4.62	92%	4.71	94%	1.9%	
Chloride	ND	2.5	mg/L	2.61	104%	2.37	95%	9.6%	
Nitrate as N									
			Limits: 90%-110%		90%-110%		20%		

QC Batch ID:	Blank	LCS Conc	Units	LCS Results	LCS Recov	LCSD Results	LCSD Recov	RPD	Flags
WCPRB02-14-08-05	ND	10	mg/L	8.75	88%	8.75	88%	0.0%	
Total Kjeldhal Nitrogen as N									
			Limits: 80%-120%		80%-120%		20%		

QC Batch ID:	Blank	LCS Conc	Units	LCS Results	LCS Recov	LCSD Results	LCSD Recov	RPD	Flags
WCPRB03-14-08-06	ND	10.0	mg/L	8.75	88%				
Ammonia									
			Limits: 80%-120%		80%-120%		20%		

QC Batch ID:	Blank	LCS Conc	Units	LCS Results	LCS Recov	LCSD Results	LCSD Recov	RPD	Flags
WCSPC02-14-08-02	ND	0.25	mg/L	0.250	100%	0.280	112%	11.3%	
Total Phosphorous as P									
			Limits: 75%-125%		75%-125%		20%		

**Batch Duplicates**

QC Batch ID:	Reference	Results	Dup Results	RPD	Flags
WCSPC02-14-08-02	14080058-001B Run 1	2.24	2.28	1.8%	
Total Phosphorous as P					
			Limits: 20%		

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Email: asklabs@amaonline.com



T104704346-14-6

City of Tucumcari  
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## QC Summary

### Matrix Spike

QC Batch ID:	Sample ID	Result	Spike Conc	Units	MS Result	MS Recov	MSD Result	MSD Recov	RPD	Flags
IONC01-14-08-05	14080055-001A	50.6	65.0	mg/L	115	99%	113	96%	1.8%	
Chloride	14080055-001A	ND	25.0	mg/L	26.8	107%	23.8	95%	11.8%	
Nitrate as N										
					Limits: 90%-110%		90%-110%		20%	
QC Batch ID: WCPRB02-14-08-05	14080055-001B	1.85	40.0	mg/L	35.0	83%	36.6	87%	4.5%	
Total Kjeldhal Nitrogen as N					Limits: 70%-130%		70%-130%		20%	
QC Batch ID: WCPRB03-14-08-06	14080058-001B	1.90	40.0	mg/L	37.8	90%	34.5	81%	9.1%	
Ammonia					Limits: 80%-120%		80%-120%		20%	
QC Batch ID: WCSPC02-14-08-02	14080058-001B	2.24	1.25	mg/L	3.23	79%	3.22	78%	0.3%	
Total Phosphorous as P					Limits: 75%-125%		75%-125%		20%	

## Methods Cross Reference

IONC-01-07-05	Anions by Ion Chromatography F <sup>-</sup> , Cl <sup>-</sup> , NO <sub>2</sub> <sup>-</sup> , NO <sub>3</sub> <sup>-</sup> , o-PO <sub>4</sub> <sup>-</sup> , SO <sub>4</sub> <sup>-</sup> , Br <sup>-</sup> Reference Methods: EPA 300.0, SW846-9056 NELAC Laboratory # T104704227 if SUB Performed using ASK Laboratories, Inc. SOP# IONC01-07-05 if onsite
WCPRB-02-07-05	Total Kjeldhal Nitrogen [TKN] Reference Method: SM 4500-Norg 18th Edition Performed using ASK Laboratories, Inc. SOP# WCPRB02-07-05 NELAC Laboratory # T104704227 if SUB
WCPRB-03-07-04	Total Ammonia as Nitrogen [NH <sub>3</sub> as (n)] Reference Method: SM 4500-NH3F 18th Edition Performed using ASK Laboratories, Inc. SOP# WCPRB03-07-04 NELAC Laboratory # T104704227 if SUB
WCSPC-02-07-05	Total Phosphorous, Phosphorous other forms Reference Methods: SM 4500-P 18th Edition NELAC Laboratory # T104704227 if SUB Performed using ASK Laboratories, Inc. SOP# WCSPC02-07-05 if onsite

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T104704346-14-6

City of Tucumcari  
Work Order ID: 14-08-0058  
Date: 08/15/2014 09:27  
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## Definitions

### Abbreviations

[ T ]	Analyte determined using method protocols for Tentatively Identified compounds. Results should be considered estimated values only.
[...]	Analyte accreditation not currently available through NELAC protocols.
[T]	Analyte determined using method protocols for Tentatively Identified compounds. Results should be considered estimated values only.
BATCH	A sample other than the order number listed was spiked within this analytical run. Alternately, a post preparation matrix spike may have been used on a diluted sample due to high matrix constituents.
CCV	Continuing Calibration Verification
Conc	Concentration
CV	Calibration Verification
FAC	Preparation and/or Dilution factor for the analysis listed.
ICS	Interference Control Sample...A = Control Matrix, B = Spiked Control Matrix
LCS/LCSD	Laboratory control spike/Laboratory control spike duplicate
LFB/LFBD	Lab fortified blank/duplicate
MQL	Method quantitation limit (reflects any laboratory adjustments made to the sample during analysis such as dry weight or dilutions) i.e. the Method reporting Limit.
MS/MSD	Matrix spike/Matrix spike duplicate
NA	Not Applicable/Not Analyzed
ND	Analyte not detected at or above SQL
PMS/PMSD	Post Preparation Matrix spike/duplicate
QC	Quality Control
RPD	Relative percent difference
SQL	Sample quantitation limit (reflects any laboratory adjustments made to the sample during analysis such as dry weight or dilutions) i.e. the Sample Detection Limit for the method as prepared.
Sub	Analysis performed by subcontract laboratory

### Units of Measurement

mg/L                      mg/L = milligrams per liter (ppm)

### Flags

N1                      For multi-analyte methods, laboratory is approved for methods, but analyte not in laboratory NELAC accredited list. Results provided may be considered estimated values, and/or QC information should be used to validate results where available.  
For single analyte methods, analyte not in laboratory NELAC accredited list. Results provided may be considered estimated values, and/or QC information should be used to validate results where available.

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T104704346-14-6

City of Tucumcari  
Work Order ID: 14-08-0058  
Date: 08/15/2014 09:27  
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**Sample Preservation Verification**

Shipping Method: Hand Delivered

Chain of Custody Included

Chain of Custody Completed Correctly

All Listed Containers Received

Cooler # 1  Ice Present  
 Cooler Seal Present  
 Cooler Seal Intact

Temperature: Wet Ice 5.6° C  
 Bottle Seals Present  
 Bottle Seals Intact

Thermometer: IR 122162967  
 Broken Bottles Present  
 Loose Caps On Bottles

Fraction ID	Matrix	Grab/Comp	Cooler(s)	Properly Preserved	Correct Container	Head Space	Indicated Preservative	pH	pH Source
14080058-001A	Liquid	Grab	1	Yes	Yes	NA	Chilled 4° ± 2° C	NA	
14080058-001B	Liquid	Grab	1	Yes	Yes	NA	H2SO4	<= 2	Paper 10B419
14080058-001D	Liquid	Grab	1	Yes	Yes	NA	H2SO4	NA	

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City of Tucumcari  
 Work Order ID: 14-08-0058  
 Date: 08/15/2014 09:27  
 Page: 6 of 6

**Chain of Custody Record**

**ASK Laboratories**  
 Analytical Services Kwiki

Work Order No. \_\_\_\_\_  
 Client Name CITY OF TUCUMCARI  
 Project I.D./Location WWTTP  
 Address 1100 N. BUCK ST. BOX 1888  
 Telephone 574030618  
 Sampled By ML

5935 Glenoak Lane  
 Amarillo, Texas 79109  
 Telephone: (806) 353-4425  
 Facsimile: (806) 352-6454

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Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analyst Required	Remarks
01	8-12-14	09:51	Liquid		<input checked="" type="checkbox"/>	WWTTP EFFLUENT	2	<input checked="" type="checkbox"/>	
02						Ground Water Permit DP-1700			
03									
04									
05									
06									
07									
08									
09									
10									

Received by (Signature)	Time	Received by (Signature)	Time	Received by (Signature)	Time
<i>[Signature]</i>	12:00	<i>[Signature]</i>	12:00	<i>[Signature]</i>	12:00

Client Agrees to:	Headspace	Yes	No
Accept Returned Sample	Preserved	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Pay for sample Disposal (\$30 per 100 grams)	Wet Ice	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Client's Signature	Temper Seal	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Additional Comments: *[Handwritten notes]*

The results provided with this report for Work Order 14-08-0058 are consistent with the National Environment Laboratory Accreditation Program, except where otherwise noted, and solely reflect the analysis of the samples provided. ASK Laboratories, Inc. is not responsible for the use or characterization of this data as representative for any sample or material not specifically analyzed by the laboratory or its subcontractors. ipage Number6 is the last ipage of the report.

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