



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

August 14, 2015

The Honorable David Venable, Mayor
Village of Cloudcroft
Post Office Box 317
Cloudcroft, New Mexico 88317

Re: Village of Cloudcroft Wastewater Treatment Plant; Minor; Municipal Individual Permit; SIC 4952; Compliance Evaluation Inspection; NPDES Permit NM0023370; July 30, 2015

Dear Mayor Venable:

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)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

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

If you have any questions about this inspection report, please contact Sandra Gabaldon at (505) 827-1041 or at sandra.gabaldon@state.nm.us.

Sincerely,

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

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson (6EN-WC) by e-mail
Tung Tguyen, (6EN-WQ) by email
NMED District I 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
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SECTION A – PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED NO)

DETAILS:

- 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE Y N NA
- 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES Y N NA
- 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT Y N NA
- 4. ALL DISCHARGES ARE PERMITTED Y N NA

SECTION B – RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. S M U NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS:

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. Y N NA
- 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. S M U NA
 - a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING Y N NA
 - b) NAME OF INDIVIDUAL PERFORMING SAMPLING Y N NA
 - c) ANALYTICAL METHODS AND TECHNIQUES. Y N NA
 - d) RESULTS OF ANALYSES AND CALIBRATIONS. Y N NA
 - e) DATES AND TIMES OF ANALYSES. Y N NA
 - f) NAME OF PERSON(S) PERFORMING ANALYSES. Y N NA
- 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. S M U NA
- 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. S M U NA
- 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. Y N NA

SECTION C – OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. S M U NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS:

- 1. TREATMENT UNITS PROPERLY OPERATED. S M U NA
- 2. TREATMENT UNITS PROPERLY MAINTAINED. S M U NA
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. S M U NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. S M U NA
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE S M U NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. S M U NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. S M U NA
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. Y N NA
- STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. Y N NA
- PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. Y N NA

SECTION C – OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? Y N NA
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? Y N NA
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? Y N NA

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

SECTION D – SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED YES)
 DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. Y N NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. Y N NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. Y N NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. Y N NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. Y N NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE Y N NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. Y N NA

b) PROPER PRESERVATION TECHNIQUES USED. Y N NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. Y N NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? Y N NA

SECTION E – FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED YES)
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE – 3" Parshall Flume

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

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

4. CALIBRATION FREQUENCY ADEQUATE. 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. 0 % 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 Aqua Environmental Testing Laboratory

LAB ADDRESS 103 Via Aguila, Ruidoso, NM

PARAMETERS PERFORMED BOD, TSS, E. coli

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED NO).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001							

RECEIVING WATER OBSERVATIONS Outfall location is in a canyon and inaccessible to the inspector with brush and rough terrain. Effluent was observed at manhole prior to discharge to canyon.

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: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED).

No Samples taken during this inspection.

- 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

VILLAGE OF CLOUDCROFT WASTEWATER TREATMENT PLANT

NPDES PERMIT NUMBER: NM0023370

COMPLIANCE EVALUATION INSPECTION

DATE OF INSPECTION: July 30, 2015

FURTHER EXPLANATIONS:

Introduction:

On July 30, 2015, Sandra Gabaldón of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQP), conducted a Compliance Evaluation Inspection (CEI) at the Village of Cloudcroft Wastewater Treatment Plant (WWTP) in Otero County, Cloudcroft, New Mexico.

The Cloudcroft WWTP is classified as a minor 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 NM0023370. This permit regulates the WWTP discharge to a dry canyon, thence to Fresnal Canyon in Segment 20.6.4.801 of the Tularosa Basin according to the *State of New Mexico Standards for Intersate and Intrastate Surface Waters, 20.6.4. NMAC (as amended June 5, 2013)*. This segment is classified as a *CLOSED BASIN, with designated uses of: Irrigation, domestic water supply, high quality coldwater aquatic life, livestock water, wildlife habitat, and primary contact*.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with the NPDES permit. This inspection report is based on information provided by the Permittee's representatives, observations made by the NMED personnel and records and reports kept by the permittee and / or NMED.

Upon arrival at approximately 1100 hours, the inspector contacted Mr. Scott Powell and asked him to meet her at the WWTP. When Mr. Powell arrived, the inspector, Ms. Gabaldon, made introductions, explained the purpose of the inspection and presented her credentials to Mr. Scott Powell. The inspector and operator proceeded with a tour of the facility, records review and an exit conference with Mr. Powell and the Honorable David Venable, Mayor, Village of Cloudcroft.

Issues facing the WWTP:

Cloudcroft has a population of approximately 667 people (2010 Census) year round, but that increases to approximately 2,000 during the tourist season when golfing during the summer and skiing during the winter are activities enjoyed at this high mountain village (approximately 9,000 feet above sea level). The Village of Cloudcroft depends on snowmelt to regenerate their aquifers and springs. During the prolonged drought, snowmelt decreased and the Village has had a shortage of water. In a state of emergency in 2004, the Village was forced to haul water in tankers to sustain the population. Because of this, the Village requested and received funds to build a new treatment facility in order to provide the Village with non-potable and potable water sources. These funds came from the Water Innovation Fund under former Governor Bill Richardson. Other funds came from the State Water Trust Board and annual grants from the State Legislature. The new treatment facility was supposed to be completed years ago, but because of issues with building the facility, it is now set to be completed in December 2015.

The new system will consist of preliminary filtration through fine screens to exclude grit, and then will undergo aerobic biological treatment, and then the membrane bioreactor (MBR) which separates the liquid from any suspended solids. The membrane's pores will admit no particles greater than 0.1 microns which is capable of removing bacteria, pathogens and viruses. The water will then be disinfected and moved to a storage tank prior to being pumped to the water treatment facility. At the water treatment facility, the water will go through reverse osmosis (RO) which further filters out particles larger than 0.001 microns and will undergo ultrafiltration (UF). At this point, the permeate (water which has passed through the filter) is disinfected again and sent to a covered storage tank where it mixes 50/50 with well/spring water to be used by the Village. Again, the Village hopes to have this completed by December 2015.

Treatment Scheme (at the time of this inspection):

The Cloudcroft WWTP consists of the headworks, fine filtration, a clarifester, trickling filter, secondary clarifier, and chlorine contact chamber.

There are a total of three lift stations for this facility. The influent enters the headworks where grit and large debris are removed. The grit and debris are bagged and sent to the land fill for final disposal. There is a 6" Parshall flume that measures the influent flow.

The flow then enters the circular clarigester for primary settling. After the leaving the clarigester, the flow is directed through a valve box and then to a covered trickling filter with rock media. Following the trickling filter, wastewater is sent to a circular secondary clarifier. Then, the flow is sent to the serpentine chlorine contact chamber where it is disinfected with sodium hypochlorite and then sent through a 3" Parshall flume for effluent flow measurement with a totalizing meter. After traveling through the flume, effluent is de-chlorinated with sodium bisulfite and sent to the outfall.

Sludge:

Sludge from the clarigester is gravity fed through a drain line and then to a pit. There is a pump station located on HWY 182 for pumping the pit. The location of the pump station allows the septic hauler to remove waste twice a month without concerns of weather. Ruidoso Septic removes the waste and hauls it to the landfill for final disposal.

Further Explanations:

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

Section B – Recordkeeping and Reporting – Overall rating “Unsatisfactory”

Part II, Section D. Pollution Prevention Plan requires:

The permittee shall institute a program within 12 months of the effective date of the permit (or continue an existing one) directed towards optimizing the efficiency and extending the useful life of the facility. The permittee shall consider the following items in the program:

- a. The influent loadings, flow and design capacity;*
- b. The effluent quality and plant performance;*
- c. The age and expected life of the wastewater treatment facility's equipment;*
- d. Bypasses and overflows of the tributary sewerage system and treatment works;*
- e. New developments at the facility;*
- f. Operator certification and training plans and status;*
- g. The financial status of the facility;*
- h. Preventive maintenance programs and equipment condition and;*
- i. An overall evaluation of conditions at the facility.*

In Part III, Standard Conditions, Section C.4 Record Contents requires:

Records of monitoring information shall include:

- a. The date, exact place, and time of sampling or measurement;*
- b. The individual(s) who performed the sampling or measurement;*
- c. The date(s) and time(s) analyses were performed;*
- d. The individual who performed the analyses;*
- e. The analytical technique or methods used; and*
- f. The results of such analyses.*

Findings for Recordkeeping and Reporting:

The permittee has failed to institute a pollution prevention program within 12 months of the effective date of the permit, September 12, 2012. The permittee is required to institute the pollution prevention plan to cover the items above as soon as possible. This pollution prevention plan should be updated when the new facility comes online.

The permittee provided bench sheets for the month of April 2015. The inspector reviewed the bench sheets for Total Residual Chlorine (TRC) and pH, which are done onsite by the operator, Mr. Powell.

The bench sheets for TRC provide the Time of Sampling, but do not have a Time of Analysis provided on the sheet. The inspector spoke with Mr. Powell regarding this and he stated that the Time of Analysis is provided on the same line as the Time of Sampling. It may be necessary for Mr. Powell to distinguish both the Time of Sampling and Time of Analysis rather than having it on the same line.

The permittee did do daily samples for TRC, however; the inspector finds it odd that the sample and analysis time for all the bench sheets is 3 minutes apart every day. Also, on April 18th and 19th, there is no analysis time recorded (as stated previously by Mr. Powell).

The pH bench sheets provided have the time but do not specify if this is the time of sample or time of analysis. There are initials for the "sampler", but it is not known who the "analyzer" of the sample is. The bench sheet should provide all the information required in Part III, Section C.4 in order to verify that the sample is being analyzed according to the holding time. The holding time for pH is 15 minutes. The inspector cannot verify that the analysis is performed according to the required holding time in 40 CFR 136.

Section C – Operations and Maintenance – Overall Rating of "Unsatisfactory"

The Permit requires in Part III, Section B.3:

- a. *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a*

manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

- b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.*

Findings for Operation and Maintenance:

The permittee does not have standby power for any failures that may occur at the facility. The permittee suggested that this will be part of the new MBR system.

The permittee has failed to implement emergency control procedures. This is an imperative part of the operation at the facility since it is located within the National Forest. Any fire that may occur needs to be addressed as an emergency and all employees need to be aware of any procedures that need to be taken with the chemicals that are onsite.

Because this facility is over 30 years old, the permittee no longer has spare parts and excess inventory for this wastewater treatment plant. This has caused some issues with maintaining the facility. This issue should be resolved in December when they anticipate the operation of the new MBR will be online.

The facility is struggling at this time to maintain the treatment units for proper operation and maintenance. For example, the chlorine contact chamber has a sludge blanket of approximately one foot. There should be no sludge in a chlorine contact chamber. There is short circuiting occurring in the secondary clarifier and there are also floatable solids seen in the secondary clarifier.

On this date, July 30, 2015, the sodium bisulfate was turned off when the inspector checked the building in which it is stored and pumped to the effluent. The operator stated that he was cleaning the building the day before and must have accidentally turned it off. The inspector

asked that the operator take a TRC sample that day to see what the TRC was in the effluent. The sodium bisulfate was immediately turned on during the inspection.

Section D – Self-Monitoring – Overall rating of “Marginal”

The Permit requires in Part III, Section C.5:

- a. Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in this permit or approved by the Regional Director.*
- 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.*
- c. An adequate analytical quality control program, including analysis 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.*

The chain of custody records from Aqua Environmental Testing Laboratory do not provide the temperature of the samples upon arrival at their laboratory. Samples for BOD analysis may degrade significantly during storage between collection and analysis, resulting in low BOD levels. It is unknown if the sample was at or below 4° C from the time of collection. TSS should also be stored at 4° C up to the time of analysis to minimize microbiological decomposition of solids. The laboratory should report the length and temperature of storage with the results provided to the permittee.

The permittee is collecting their E. coli sample in one bottle and transferring it to another rather than collecting it in the bottle provided by the commercial laboratory which is prepared with sodium thiosulfate to remove all chlorine residual. The permittee was instructed that this collection procedure does not follow 40 CFR 136 sample collection requirements.

Section E – Flow Measurement – Overall rating of “Unsatisfactory”

The Permit requires in Part III.C.6, Flow Measurement:

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.

Findings for Flow Measurement:

After the inspection completed by NMED in 2014, the permittee contacted an electrical contractor to calibrate the effluent totalizer. At this time, the contractor provided the permittee a table of flow measurements that are taken from reading the staff gauge. The permittee has not done any calibration checks since the last inspection was performed. The inspector suggested that the permittee have two operators on site, one to read the totalizer and one to read the staff gauge at the same time and compare the results. The flow measurement is critical in calculating the mass loading for BOD and TSS.

The permittee has a 3" Parshall flume for effluent flow reading. According to Isco Open Channel Flow Measurement Handbook, the calculation for Million Gallons per Day (MGD), which is reported on the Discharge Monitoring Report (DMR) is:

$$\text{MGD} = 0.6411 H^{1.547}$$

WHERE H = Head in Feet

Section F – Laboratory – Overall rating of “Marginal”

The Permit requires in Part III, Section C.5:

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

- c. *An adequate analytical quality control program, including analysis 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.*

Findings for Laboratory:

The TRC bench sheets state the method used is 4500-Cl G DPD Colorimetric, but does not provide the Standard Methods Edition being cited. 40 CFR 136 has specific Standard Method (SM) Editions that are acceptable for compliance sampling. For instance, the TRC method was approved in 2000, and this is included in Standard Methods 21st Edition. Other SMs are outdated and no longer approved (18th, 19th, 20th) for TRC. It is unknown if the permittee is using the correct method for TRC.

The permittee provided bench sheets from the contract laboratory, Aqua Environmental Testing Laboratory, in Ruidoso, NM. The laboratory analyzes pH, Temperature, Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), E. coli and Ammonia (NH₃-N). The BOD method being used is Standard Methods for the Examination of Water and Wastewater, 20th Edition. However, the approved method in 40 CFR 136 is the Standard Method 21st Edition. EPA no longer accepts the 20th Edition for compliance sampling.

The permittee is not performing duplicate samples as required by the quality control program. The purpose of laboratory control procedures is to ensure high-quality analyses by the use of control samples, control charts, reference materials, and instrument calibration. The laboratory must initiate and maintain controls throughout the analysis of samples. Specifically, each testing batch must contain at least one blank, standard, duplicate, and spiked (as applicable) sample analysis. When a batch contains more than 10 samples, every tenth sample should be followed by a duplicate and a spike (as applicable).

The precision of laboratory findings refers to the reproducibility or degree of agreement among replicate measurements of the same quantity. The closer the numerical values of the measurements come to each other, the more precise are the measurements. In a laboratory QC program, precision is determined by the analysis of actual samples in duplicate. These may represent a range of concentrations and a variety of interfering materials usually encountered during the analysis.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Sandra Gabaldon	Date: July 30, 2015	Time: 1059 Hours
City/County: Village of Cloudcroft / Otero County		State: New Mexico
Location: Village of Cloudcroft WWTP		
Subject: Secondary Clarifier – Short circuiting		



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Sandra Gabaldon	Date: July 30, 2015	Time: 1059 Hours
City/County: Village of Cloudcroft / Otero County		State: New Mexico
Location: Village of Cloudcroft WWTP		
Subject: Secondary Clarifier – Floatable solids		



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Sandra Gabaldon	Date: July 30, 2015	Time: 1119 Hours
City/County: Village of Cloudcroft / Otero County		State: New Mexico
Location: Village of Cloudcroft WWTP		
Subject: Clarigester		



NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Sandra Gabaldon	Date: July 30, 2015	Time: 1122 Hours
City/County: Village of Cloudcroft / Otero County		State: New Mexico
Location: Village of Cloudcroft WWTP		
Subject: Covered Trickling Filter		



NMED/SWQB
Official Photograph Log
Photo # 5

Photographer: Sandra Gabaldon	Date: July 30, 2015	Time: 1127 Hours
City/County: Village of Cloudcroft / Otero County		State: New Mexico
Location: Village of Cloudcroft WWTP		
Subject: Serpentine Chlorine Contact Chamber		



NMED/SWQB
Official Photograph Log
Photo # 6

Photographer: Sandra Gabaldon	Date: July 30, 2015	Time: 1129 Hours
City/County: Village of Cloudcroft / Otero County		State: New Mexico
Location: Village of Cloudcroft WWTP		
Subject: Approximately 12" of sludge in Chlorine Contact Chamber		

