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Governor

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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Surface Water Quality Bureau

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KYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

May 19, 2016

Honorable Mayor, Justin Ingram
Village of Fort Sumner
Post Office Box 180
Fort Sumner, New Mexico 88119

**Re: Village of Fort Sumner Wastewater Treatment Plant; Minor Municipal Permit; SIC 4952;
NPDES Compliance Evaluation Inspection; NM0023477; March 17, 2016**

Dear Mayor Ingram:

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.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

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

Village of Fort Sumner Wastewater Treatment Plant

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If you have any questions about this inspection report, please contact Barbara Cooney at 505-827-0212 or at barbara.cooney@state.nm.us.

Sincerely,

/S/ Bruce J. Yurdin

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

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Brent Larsen, USEPA (6WQ-PP) by e-mail
Hannah Branning, USEPA (6EN-WC) by e-mail
Jan Walker, USEPA (6EN) by e-mail
NMED District II, Robert Italiano 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 3 4 7 7 11 12 1 6 0 3 1 7 17 18 C 19 S 20 1					
Remarks					
M I N O R M U N I C I P A L					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 1 69	70 2	71 N 72 N 73	74 75	80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) I-40 To Santa Rosa, then US 84 South to Ft. Sumner. Turn left onto US-60, Sumner Avenue. Turn right on South 17th Avenue (between Billy the Kid Museum and the Super 8 Motel). Travel approximately 1.5 miles, turn right at posted sign of WWTP. De Baca County	Entry Time /Date 11:00 Hours / 17 March 2016	Permit Effective Date 01 July 2012
	Exit Time/Date 14:30 Hours / 17 March 2016	Permit Expiration Date 30 June 2017
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Michael Lucero, Operator (575)355-2401 Steve Vigil, Operator Gabe Garcia, Operator	Other Facility Data SIC 4952 Latitude 34.445119 Longitude -104.234727 (GPS at Outfall to River)	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Justin Ingram, Mayor (575) 355-2401 Village of Fort Sumner Post Office Box 180 Fort Sumner, New Mexico 88119	Yes <input checked="" type="checkbox"/> Contacted 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	U	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	M	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
U	Effluent/Receiving Waters	U	Laboratory	N	Storm Water	N	Other:

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

SEE THE FURTHER EXPLANATIONS SECTION OF THE ATTACHED REPORT

Name(s) and Signature(s) of Inspector(s) /S/ Barbara Cooney	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212 / 505-827-0160	Date 5/11/2016
Signature of Management QA Reviewer /S/ Jennifer Foote	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-0187 / 505-827-0160	Date 5/11/2016

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

 S M U NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS: Signatory Not Updated – Notification Not Sent To Regulatory Authority

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE Signatory not updated

 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: Collection System is not maintained and resulted in a toxic load being released to the RBCs as well as sanitary sewer overflows

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. WET Tests Not Done – Require 24 Hour Composite 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 – Not observed Y N NA
- a) SAMPLES REFRIGERATED DURING COMPOSITING. – Not being collected Y N NA
- b) PROPER PRESERVATION TECHNIQUES USED.- Not observed, Y N NA
- c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. Not observed 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? Monitoring not being done at frequency required in permit 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 9-inch Parshall flume
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Not calibrated 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. 10 % OF THE TIME. Y N NA

6. SPIKED SAMPLES ARE ANALYZED. 10 % OF THE TIME. Y N NA

7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME _____ City of Tucumcari Municipal Laboratory

LAB ADDRESS _____ P.O. Box 1188 / Tucumcari, NM 88401

PARAMETERS PERFORMED E.coli Bacteria, BOD, TSS

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	Very slightly cloudy	none	none	slightly green	

RECEIVING WATER OBSERVATIONS Effluent sampling results have not been reported to the state nor to EPA most of the time. However a phone call of an E.coli exceedences made to the inspector by the operators the day following the inspection.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED YES.)
 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: Landfill (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

Village of Fort Sumner
Wastewater Treatment Plant
Compliance Evaluation Inspection
NPDES Permit Number NM0023477
17 March 2016
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Introduction

On March 17, 2016 a Compliance Evaluation Inspection (CEI) was conducted at the Village of Fort Sumner Wastewater Treatment Plant (WWTP) NM0023477 by Barbara Cooney and Jennifer Foote of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). 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 by EPA to evaluate compliance with the NPDES permit program. This inspection report is based on information supplied by the Village of Fort Sumner representatives (the permittee), observations made by the NMED inspector, reports and records kept by the permittee and/or NMED.

Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative section of this report titled, Further Explanations. The facility is classified as a minor municipal discharger, with a design flow of 0.21MGD. The facility discharges treated effluent directly to the Pecos River in Water Quality Segment 20.6.4.207 of the Pecos River Basin. The designated uses for the receiving stream are irrigation, marginal warm water aquatic life, livestock watering, wildlife habitat and secondary contact.

Inspection Details

NMED inspectors arrived at the Village office at 11:00 hours, and shortly after, traveled to the WWTP. Lead inspector Barbara Cooney showed credentials and explained the purpose of the inspection to Ms. Nichole Cortes and Ms. Alisha Segura, both of the village administration and utility billing department, and a few minutes later at the treatment plant credentials were shown again to Mr. Gabe Garcia - Operator, Mr. Michael Lucero - Operator, and Mr. Steve Vigil - Operator, who accompanied the inspectors as they toured the facility and outfall.

Following the inspection an exit interview was held at the village office with the aforementioned village representatives and Ms. Jean Moulton - Deputy Clerk, also joining on conference phone call was Mr. Justin Ingram – Mayor and Ms. Jamie Wall - Village Administrator. Preliminary findings were discussed. The Inspector left the village facilities at approximately 14:30 hours.

Treatment Scheme

The village sewage collection system has four lift stations, combined with gravity flow that transports waste to the treatment plant. The sewer system includes a combination of old cast iron and clay piping, some of it collapsing and failing with age. Raw sewage reaches the entrance works where a comminutor grinds large solids and a backup bypass channel to a mechanical bar screen. Solids and grit caught in the bar screen are collected in a hopper and sent to the De Baca County Landfill after passing the paint filter test for water content. The headworks also consist of an aerated grit chamber and a six-inch Parshall flume. The influent is then lifted by two alternating submersible pumps to the two parallel SBR (Sequencing Batch Reactors) basins.

Wastewater is processed through alternating cycles of first filling and mixing, then an aerobic, anaerobic, settling and finally a decant phase. Four small blowers which provide aeration to these two units. An aerobic sludge digester is located between the two SBR units. Decant water from the SBR basins enter a flow equalization unit (an old Schreiber unit) which ensures an even flow to the disinfection system.

Ultraviolet (UV) disinfection is used at the facility for bacterial control. A single bank of lights precedes the Parshall Flume with a staff gauge and an ultrasonic flow meter where effluent flow is measured. The treated wastewater flows several hundred yards through an enclosed pipe to the outfall at the Pecos River.

Plant operations are monitored and controlled by the Supervisory Control and Data Acquisition (SCADA) system. A diesel backup generator is tested every Sunday and ready for use if a power failure occurs. A call-out alarm system is activated by the SCADA system for any plant problems after hours.

Sludge

Sludge is wasted from the SBRs, and sent to the aerobic digester. Wasted sludge from the digester is then placed in the sludge drying beds for a period of at least 90 days. Decant from the digesters is sent back to the head of the SBR system. The drying beds have underdrains that send liquids back to the headworks.

Solids are also wasted from the old Schreiber system directly to the sludge drying beds. A sump pump with hose attached is used to move the wasted solids (See attached photo).

Dried sludge is moved to another cement pad, windrowed and allowed to sit on site. Previously sludge was taken to the De Baca County Landfill for final disposal. According to operators, solids have not been tested nor transported to the landfill for more than 5 years. Operators and town administrators are exploring alternative land application sites for final disposal.

Further Explanations

Note: The sections are arranged according to the format of EPA form 3560-3 and checklist, attached, rather than being ranked in order of importance

Permit Verification

Overall Rating For Permit Verification (Marginal)

Permit Requirement For Permit Verification

The permit requires in Part III.D.

11. SIGNATORY REQUIREMENTS

All applications, reports, or information submitted to the Director shall be signed and certified.

(3) FOR A MUNICIPALITY, STATE, FEDERAL, OR OTHER PUBLIC AGENCY - by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes:

(a) The chief executive officer of the agency, or

(b) A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

b. ALL REPORTS required by the permit and other information requested by the Director shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described above;

(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual or an individual

occupying a named position; and,
(3) The written authorization is submitted to the Director.

c. **CERTIFICATION**

Any person signing a document under this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Findings For Permit Verification

Notification has not been provided to the State and to EPA about a change in signatory authority. The current signatory authority for records including Discharge Monitoring Reports (DMR) should be the Mayor, City Administrator and/or by a designated authority chosen by the Mayor.

Since the time the permit was issued, a new Mayor, the Honorable Justin Ingram was elected and a new Village Administrator, Ms. Jamie Wall has taken office.

Record Keeping & Reporting

Overall Rating For Record Keeping and Reporting (Unsatisfactory)

Permit Requirements for Record Keeping and Reporting

The permit requires in Part III c. MONITORING AND RECORDS

3. RETENTION OF RECORDS

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report, or application. This period may be extended by request of the Director at any time.

4. RECORD CONTENTS

Records of monitoring information shall include:

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

D. REPORTING REQUIREMENTS

4. DISCHARGE MONITORING REPORTS AND OTHER REPORTS

Monitoring results must be reported to EPA on either the electronic or paper Discharge Monitoring Report (DMR) approved formats. Monitoring results can be submitted electronically in lieu of the paper DMR Form. To submit electronically, access the NetDMR website at www.epa.gov/netdmr and contact the R6NetDMR.epa.gov in-box for further instructions. Until you are approved for Net DMR, you must report on the Discharge

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Monitoring Report (DMR) Form EPA No. 3320-1 in accordance with the "General Instructions" provided on the form. No additional copies are needed if reporting electronically, however when submitting paper form EPA No. 3320-1, the permittee shall submit the original DMR signed and certified as required by Part III.D.11 and all other reports required by Part III.D. to the EPA at the address below. Duplicate copies of paper DMR's and all other reports shall be submitted to the appropriate 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 5469
1190 Saint Francis Drive
Santa Fe, NM 87502-5469*

7. TWENTY-FOUR HOUR REPORTING

a. The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall be provided within 5 days of the time the permittee becomes aware of the circumstances. The report shall contain the following information:

- (1) A description of the noncompliance and its cause;*
- (2) The period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and,*
- (3) Steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.*

b. The following shall be included as information which must be reported within 24 hours:

- (1) Any unanticipated bypass which exceeds any effluent limitation in the permit;*
- (2) Any upset which exceeds any effluent limitation in the permit; and,*
- (3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Director in Part II (industrial permits only) of the permit to be reported within 24 hours.*

c. The Director may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

Findings for Recordkeeping & Reporting

1. DMRs have not been submitted since September 2014. Though according to operators and the commercial laboratory at the City of Tucumcari WWTP, samples have been taken and analyzed.

2. The filing system for the WWTP appeared to be: all documents stored in a drawer without any order. Operators could not locate many sampling records, daily O& M logs and monitoring records. Operators did provide some records for January and February 2016 at the inspectors' request.

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3. There are no pH records. pH sampling has not been done at the facility according to operators in more than a year. The operators indicated that a pH meter was recently purchased and they hoped to have training using the unit from the New Mexico Rural Water Association.
4. At least one large sanitary sewer overflow was not reported. Operators did not know the exact date but indicated it occurred in the month preceding the Compliance Evaluation Inspection by NMED. This overflow resulted in a large amount of raw sewage and accumulated sludge to overflow at a lift station in town as well as to inundate the treatment headworks, followed by a toxic mix entering the SBR system.
5. Twenty four hour and five day reporting of effluent exceedences have not been reported. According to the contract Laboratory at the City of Tucumcari WWTP, who conducts analysis for the BOD, TSS and E.coli samples, several bacteria exceedences have occurred over the last few years though an exact number and date of exceedences was not provided.
6. Flow measurements are stored electronically, though no records of flow meter calibration and checks were available.

Effluent /Receiving Waters

Overall Rating For Effluent/Receiving Waters (Unsatisfactory)

Permit Requirements for Effluent / Receiving Waters

The permit requires in Part I.

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	Standard Units		MEASUREMENT FREQUENCY	SAMPLE TYPE
POLLUTANT	MINIMUM	MAXIMUM		
pH	6.6	9	Five/Week	Instantaneous Grab

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS						MONITORING REQUIREMENTS	
	lbs/day, unless noted			mg/l, unless noted			MEASUREMENT FREQUENCY	SAMPLE TYPE
POLLUTANT	30-DAY AVG	DAILY MAX	7-DAY AVG	30-DAY AVG	DAILY MAX	7-DAY AVG		
Flow	Report MGD	Report MGD	Report MGD	***	***	***	Daily	Totalizing Meter
Biochemical Oxygen Demand, 5-day	52.54	N/A	78.81	30	N/A	45	Twice/Month	Grab
Biochemical Oxygen Demand, 5-day % removal, minimum	≥ 85% (1)	---	---	---	---	---	Once/Month	Calculation (1)
Total Suspended Solids	52.54	N/A	78.81	30	N/A	45	Twice/Month	Grab
Total Suspended Solids % removal, minimum	≥ 85% (1)	---	---	---	---	---	Once/Month	Calculation (1)
E. Coli Bacteria	N/A	N/A	N/A	548 (2)	2507 (2)		Twice/Month	Grab
Total Residual Chlorine	N/A	N/A	N/A	N/A	19 ug/l (3)	N/A	Daily (3)	Instantaneous Grab (3)

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EFFLUENT CHARACTERISTICS	DISCHARGE MONITORING		MONITORING REQUIREMENTS	
	30-DAY AVG MINIMUM	7-DAY MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
WHOLE EFFLUENT TOXICITY (PCS 22414) (7-Day NOEC) (4)	37 %	37 %		
Ceriodaphnia dubia (4)	Report	Report	Once/6 Months	24-Hr Composite
Pimephales promelas	Report	Report	Once/6 Months	24-Hr Composite

FOOTNOTES:

1. *Percent removal is calculated using the following equation: (average monthly influent concentration – average monthly effluent concentration) ÷ average monthly influent concentration.*
2. *Colony forming units (cfu) per 100 ml*
3. *TRC shall be measured during periods when chlorine is used as either backup bacteria control or when disinfection of plant treatment equipment is required. Regulations at 40 CFR Part 136 define "instantaneous grab" as analyzed within 15 minutes of collection. The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes.*
4. *Monitoring and reporting requirements begin on the effective date of this permit. Compliance with the Whole Effluent Toxicity limitations is required on the effective date of the permit with the exception of the C. dubia's sublethal endpoint which is required to comply 3 years after the effective date of the permit. See PART I, Compliance Schedules, and PART II, Whole Effluent Toxicity Testing Requirements for additional WET monitoring and reporting conditions*

There shall be no discharge of oils, scum, grease and other floating materials that would cause the formation of a visible sheen or visible deposits on the bottom or shoreline, or would damage or impair the normal growth, function or reproduction of human, animal, plant or aquatic life.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the discharge from the final treatment unit prior to the discharge into the receiving stream from the following approximate location: Outfall 001.

The permit requires in Part II.D.

OVERFLOW REPORTING

The permittee shall report all overflows with the DMR submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: date, time, duration, location, estimated volume, and cause of the overflow. They shall also include observed environmental impacts from the overflow; actions taken to address the overflow; and, the ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary).

Overflows that endanger health or the environment shall be orally reported to EPA at (214) 665- 6595, Pueblo of Taos at (575) 751-4601 and NMED Surface Water Quality Bureau at (505) 827- 0187, within 12 hours from the time the permittee becomes aware of the circumstance. A written report of overflows that endanger health or the environment shall be provided to EPA, Pueblo of Taos, and NMED Surface Water Quality Bureau within 5 days of the time the permittee becomes aware of the circumstance.

Findings for Effluent / Receiving Waters

1. The last Compliance Evaluation Inspection by NMED on October 29, 2013, a review of the Discharge Monitoring Reports since that date show the facility has not submitted DMRs since September 2014. A single effluent exceedence was reported by the permittee to the inspectors the week of the inspection. Other than that no reports have been received by NMED nor EPA. According to discussions with operators and with the contract laboratory, The City of Tucumcari

WWTP (who does laboratory work for many small systems), there have been unreported effluent exceedences for bacteria during that time.

2. An overflow of the lift station at the WWTP and a blockage in the collection system was reported to the inspectors at the time of the inspection. The actual date of the blockage was not provided. It is unclear if the raw sewage reached any surface water. The sewer blockage, once cleared released large amounts of suspended solids that inundated the treatment plant and caused an overflow at the head works. The large volume of septic influent also adversely affected the entire WWTP. Microbial populations are not monitored at this facility as part of the process control. However visual observations of the aeration basins indicated a very dark blackish sludge that is typical of low aerobic microbial populations and reduced or ineffective treatment. The pH was not being monitored. The decant from the basins being sent to the old Schreiber system, now being called the equalization basin, appeared to have large amounts of unsettled solids flowing through the system. Following the EQ is the UV system and the water appeared to be very cloudy as it passed through the UV lights (see attached photo). This typically results in ineffective disinfection and high E.coli bacteria results.

3. Effluent exceedences for E.coli bacteria were reported in a phone call to the inspectors by a facility operator March 18, 2016.

Flow Measurement

Overall Rating For Flow Measurement (Marginal)

Permit Requirements for Flow Measurement

The permit requires in Part III.C.

6. FLOW MEASUREMENTS

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

Findings for Flow Measurement

There were no records of flow meter calibration.

The flow meter must be calibrated on an annual basis.

The permittee does not do calibration checks to assure the flows measured are within 10% of the actual effluent flow.

The effluent flow recorded for January 20, 2016 was 0.0400 MGD and for February 17, 2016 was 0.0200 MGD. There was no explanation on why the flow in February was half the daily flow in January.

Permit Requirements for Self Monitoring

Overall Rating For Self Monitoring (Unsatisfactory)

Permit Requirements for Self Monitoring

The permit requires in Part III. C. MONITORING AND RECORDS

2. REPRESENTATIVE SAMPLING

Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.

3. RETENTION OF RECORDS

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report, or application. This period may be extended by request of the Director at any time.

Findings for Self Monitoring

1. Many records could not be located and organized by the operators during the inspection. Without adequate recordkeeping there is no way to confirm or validate compliance with self monitoring requirements in the permit.
2. There were no records of pH sampling at the facility.
3. There was not a working pH meter.
4. See the sections on Recordkeeping and Reporting and on Effluent and Receiving Water in this report for additional information about self monitoring,
5. It is suggested the permittee work with a contractor to assist in developing proper self monitoring procedures.

Laboratory

Overall Rating For Laboratory (Unsatisfactory)

Permit Requirements for Laboratory

The permit requires in Part III.

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 this permit or approved by the Regional Administrator.*
- 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 the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.*

Findings For Laboratory

1. No records were provided for pH. There is no verification that an approved method for this test can be performed by this facility.
2. No records were provided for Total Residual Chlorine (TRC). Though UV disinfection is used at this facility, there was no mechanism evident for TRC analysis in the event that use is necessary. Operators indicated if the UV system goes down the chlorine contact chamber could be used for disinfection.
3. The records that were provided for the dates January 20, 2016 and February 17, 2016 included records for BOD, TSS including the laboratory bench sheets for those pollutants, and results but no bench sheets for E.coli bacteria, from the contract laboratory. The permittee should also retain bench sheets for E.coli bacteria.

4. No records were provided indicating an adequate quality control program for sample analysis is being followed.

Operation and Maintenance

Overall Rating For Operation and Maintenance (Unsatisfactory)

Permit Requirements For Operation and Maintenance

The permit requires in Part III. 3. PROPER OPERATION AND MAINTENANCE

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

1. The lead operator for this facility recently retired and has not been replaced, resulting in inadequate operations staff. There was one Level 1 Wastewater Operator at the facility and two laborers. The laborers were working toward their operator's certification and hoped to test in May 2016. It is advisable for the permittee to work with the NMED Facility Operators Program to determine the adequate staffing requirements as well as to advertise to hire certified operators if necessary.
2. UV lights appeared to be too dim and there was no record of maintenance and/or replacement of the bulbs. There was no apparent buildup of algae in the UV chamber, nor on the bulbs.
3. Sanitary sewer overflows have occurred though not reported.
4. The sanitary sewers system has not been surveyed to evaluate the full condition of the pipes throughout. It is advisable that the permittee establish a maintenance schedule and survey schedule to evaluate the condition of the entire system to avoid the type of catastrophic overload that occurred at the WWTP in early 2016.
5. Aeration Basins – dark brownish black, indicating low growth of aerobic bacteria after toxic loads from the collection system inundated the basins in the month prior to the inspection.
6. Flow meters are not calibrated.
7. There were no Standard Operating Procedures available.
8. There were no process control samples being taken, nor a process control strategy.

Combined Sewer Overflow / Sanitary Sewer Overflow

Overall Rating for Combined Sewer Overflow/Sanitary Sewer Overflow (Unsatisfactory)

Permit Requirements for Combined Sewer Overflow / Sanitary Sewer Overflow

The permit requires in Part III. 3. PROPER OPERATION AND MAINTENANCE

a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

Findings for Combined Sewer Overflow / Sanitary Sewer Overflow

1. Sanitary sewer overflows have occurred but have not been reported.

2. The aging sewer system not being maintained. The collection system is a combination of old clay pipes and old metal pipes. The system has not been upgraded and a failure in the collection system occurred in early 2016. The exact date was not recorded nor provided to inspectors by the permittee, however the system failure was evident as overflows at the headworks of the WWTP which effected the operations in the SBR units.

Sludge Disposal

Overall Rating For Sludge Disposal (Marginal)

Permit Requirements for Sludge Disposal

Part IV of the permit requires:

ELEMENT 2- SURFACE DISPOSAL

SECTION I. REQUIREMENTS APPLYING TO ALL SEWAGE SLUDGE SURFACE DISPOSAL

A. General Requirements

1. The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal regulations to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic pollutants which may be present.

40CRF Part 503 Subpart A. General Provisions states:

(y) Store or storage of sewage sludge is the placement of sewage sludge on land on which the sewage sludge remains for two years or less. This does not include the placement of sewage sludge on land for treatment.

Findings for Sludge Disposal

1. Sludge sampling has not been done and there are no records of sludge sample results nor of sludge final disposal.

According to the operators sludge was last disposed of at the De Baca County landfill 5 years earlier. Since that time, sludge has been stored onsite in the drying beds of the facility. Solids should be kept on site for no longer than 2 years. Keeping solids on site for longer is considered long term by EPA.

The permittee indicated during an exit interview that they are interested in utilizing agricultural land as a location of land application of the processed sludge disposal. No composting was taking place at the facility at the time of the inspection.

Part IV of the permit identifies the requirements for land application. The permittee is encouraged to read these requirements. Additionally there may be additional requirements from the NMED Ground Water Quality Bureau and the NMED Solid Waste Bureau for land application. The permittee is encouraged to contact those bureaus for additional information.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Google Earth

Date: Unknown

Time: Unknown

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: Aerial View of WWTP



Google earth

feet 600
meters 200



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Google Earth

Date: March 17, 2016

Time: 12:42 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: Backup diesel generator exercised weekly and ready for use if an electrical failure occurs at the facility.



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: B.Cooney

Date: March 17, 2016

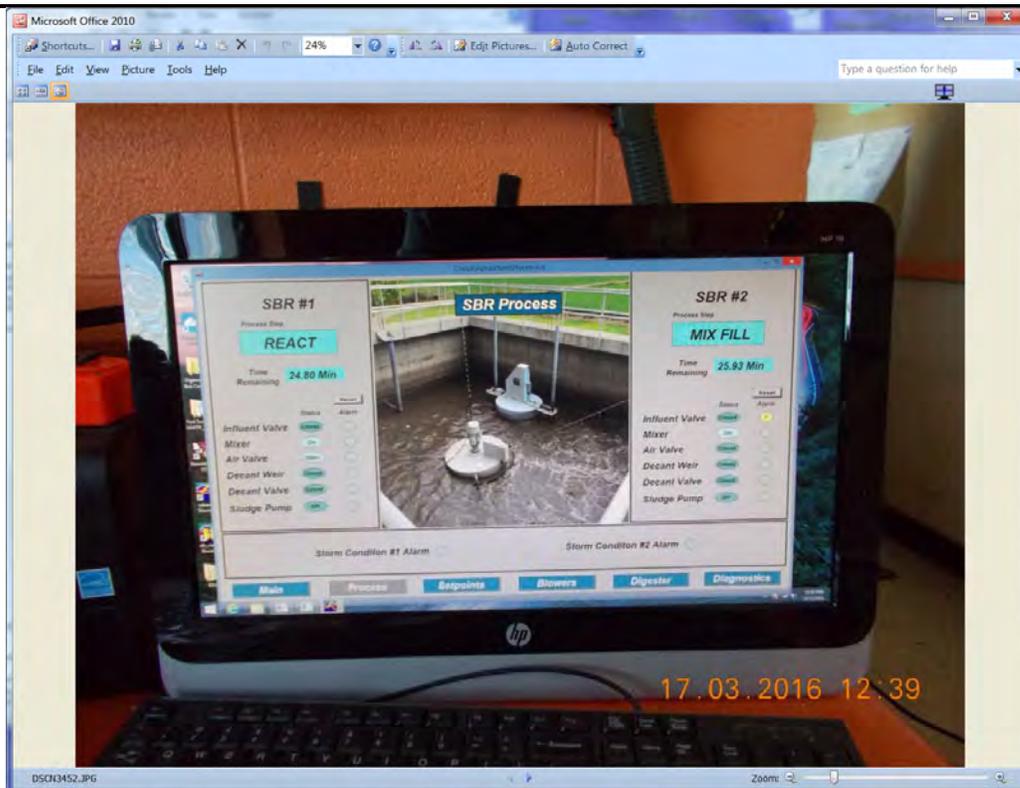
Time: 12:39 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: SCADA system monitors plant operations.



NMED/SWQB
Official Photograph Log
Photo # 4 & 5

Photographer: B. Cooney

Date: March 17, 2016

Time: 13:08 and 12:43 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: Headworks to the center right with the mechanical bar screen. To the center is main building and to the left is the UV disinfection and chlorine contact chamber.



NMED/SWQB
Official Photograph Log
Photo #6

Photographer: B. Cooney

Date: March 17, 2016

Time: 12:48 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: Influent overflow area to the lower left of photo and RBCs to the top center.



NMED/SWQB
Official Photograph Log
Photo # 7

Photographer: B. Cooney

Date: March 17, 2016

Time: 12:54 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: RBC aerator in the mixing phase – note the very dark brown/black color of the wastewater being treated as a result of a toxic load from the collection system entering the basin a few weeks earlier.



NMED/SWQB
Official Photograph Log
Photo # 8

Photographer: B. Cooney

Date: March 17, 2016

Time: 12:53 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: SBR in the Aeration phase. Again, not the blackish color of the basin water.



NMED/SWQB
Official Photograph Log
Photo # 9

Photographer: B. Cooney

Date: March 17, 2016

Time: 13:03 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: SBR in settling phase.



NMED/SWQB
Official Photograph Log
Photo # 10

Photographer: B. Cooney

Date: March 17, 2016

Time: 13:03 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: The cement lined sludge drying beds are maintained, however the sludge piles have been stored on site for more than 5 years. Note the white hose on the ground and filling the bed on the left – The solids being wasted are from the EQ basin, otherwise known as an old Schreiber treatment system, left over from the past WWTP.



NMED/SWQB
Official Photograph Log
Photo # 11

Photographer: B. Cooney

Date: March 17, 2016

Time: 13:08 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: The EQ basin, otherwise known as an old Schreiber treatment system, left over from the past WWTP, follows the SBRs and is before the UV disinfection system.



NMED/SWQB
Official Photograph Log
Photo #12

Photographer: B. Cooney

Date: March 17, 2016

Time: 13:11 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: A closer view, of the EQ basin, otherwise known as an old Schreiber treatment system, left over from the past WWTP, follows the SBRs and is before the UV disinfection system. The sump pump and white hose are being used to waste solids.



NMED/SWQB
Official Photograph Log
Photo # 13

Photographer: B. Cooney

Date: March 17, 2016

Time: 13:12 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: The UV system as seen from the EQ basin.



NMED/SWQB
Official Photograph Log
Photo # 14

Photographer: Gabe Garcia, Ft. Sumner

Date: March 17, 2016

Time: 13:16 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: The UV lights, appear to be dim and the water somewhat cloudy.



NMED/SWQB
Official Photograph Log
Photo # 15

Photographer: B. Cooney

Date: March 17, 2016

Time: 13:16 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: Effluent Parshall Flume with staff gauge and mechanical flow meter.



NMED/SWQB
Official Photograph Log
Photo # 16

Photographer: B. Cooney

Date: March 17, 2016

Time: 13:17 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: Though effluent appeared cloudy in the UV channel, it was fairly clear in this view.



NMED/SWQB
Official Photograph Log
Photo # 17

Photographer: Michael Lucero, Ft. Sumner

Date: March 17, 2016

Time: 13:30 Hours

City/County: Village of Fort Sumner / De Baca County

State: New Mexico

Location: Village of Fort Sumner, New Mexico Wastewater Treatment Plant

Subject: Outfall pipe to the Rio Grande.

