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RYAN FLYNN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

**Certified Mail - Return Receipt Requested**

March 30, 2015

Francisco Espinoza, Director  
Public Utilities Department  
Town of Taos  
400 Camino de la Placita  
Taos, New Mexico 87571

**Re: Town of Taos Wastewater Treatment Plant; Major; Individual Permit; SIC 4952;  
Compliance Evaluation Inspection; NPDES Permit NM0024066; March 19, 2015**

Dear Mr. Espinoza:

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](mailto:sandra.gabaldon@state.nm.us).

Sincerely,

*/s/ Bruce J. Yurdin*

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 II by e-mail



### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1   N   2   5   3   N   M   0   0   2   4   0   6   6   11   12   1   5   0   3   1   9   17   18   C   19   S   20   1					
M   A   J   O   R   W   W   T   P   -   T   O   W   N   O   F   T   A   O   S					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67   0   1   69	70   3	71   N	72   N	73	74   75

#### 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>TOWN OF TAOS WASTEWATER TREATMENT PLANT</b> On Hwy 68 travel north to Ranchitos Road – Turn Left at the light, and follow road to WWTP.  <b>TAOS COUNTY</b>	Entry Time /Date 0935 Hours / March 19, 2015	Permit Effective Date September 1, 2012
	Exit Time/Date 1340 Hours / March 19, 2015	Permit Expiration Date August 31, 2017
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Anthony Martinez, Operation Manager, CH2Hill / (575) 758-8401 Celsa Vigil, Lab Technician, CH2Hill / (575) 758-8401 Jerome Salazar, Operator / (575) 758-8401	Other Facility Data LAT 36° 22' 24.21" N LONG -105° 39' 21.38"W  SIC Code: 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Francisco "French" Espinoza, Public Utilities Director / (505) 575-751-2047 / (575) 751-2049 400 Camino de la Placita Taos, New Mexico 87571	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)

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

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

Please see checklist and further explanations for details of findings

Name(s) and Signature(s) of Inspector(s) <b>Sandra Gabaldon /s/ Sandra Gabaldon</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB/(505) 827-1041/(505) 827-0160</b>	Date <b>March 31, 2015</b>
Signature of Management QA Reviewer /s/ <b>Michelle Lemon</b> <b>Michelle Lemon, Municipal Team Lead</b>	Agency/Office/Phone and Fax Numbers <b>NMED/SWQB/(505) 827-2819/(505) 827-0160</b>	Date <b>March 31, 2015</b>



SECTION C – OPERATIONS AND MAINTENANCE (CONT'D)

- |   |   |
|---|---|
| 9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?<br>IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?<br>HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? | <input type="radio"/> Y <input checked="" type="radio"/> N <input type="radio"/> NA<br><input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA<br><input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA |
| 10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?<br>IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?  | <input type="radio"/> Y <input checked="" type="radio"/> N <input type="radio"/> NA<br><input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA  |

SECTION D – SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO).  
DETAILS:

- |   |  |
|---|--|
| 1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.  | X Y <input type="radio"/> N <input type="radio"/> NA |
| 2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.   | X Y <input type="radio"/> N <input type="radio"/> NA |
| 3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.  | X Y <input type="radio"/> N <input type="radio"/> NA |
| 4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.   | X Y <input type="radio"/> N <input type="radio"/> NA |
| 5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.  | X Y <input type="radio"/> N <input type="radio"/> NA |
| 6. SAMPLE COLLECTION PROCEDURES ADEQUATE  | X Y <input type="radio"/> N <input type="radio"/> NA |
| a) SAMPLES REFRIGERATED DURING COMPOSITING.   | X Y <input type="radio"/> N <input type="radio"/> NA |
| b) PROPER PRESERVATION TECHNIQUES USED.   | X Y <input type="radio"/> N <input type="radio"/> NA |
| c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.   | X Y <input type="radio"/> N <input type="radio"/> NA |
| 7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? | X Y <input type="radio"/> N <input type="radio"/> NA |

SECTION E – FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO).  
DETAILS:

- |  |  |
|--|--|
| 1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.<br>TYPE OF DEVICE <u>Parshall Flume</u>  | X Y <input type="radio"/> N <input type="radio"/> NA   |
| 2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.  | X Y <input type="radio"/> N <input type="radio"/> NA   |
| 3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.   | X Y <input type="radio"/> N <input type="radio"/> NA   |
| 4. CALIBRATION FREQUENCY ADEQUATE. <u>Totalizer calibrated on March 19, 2015</u><br>RECORDS MAINTAINED OF CALIBRATION PROCEDURES.<br>CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. | X Y <input type="radio"/> N <input type="radio"/> NA<br>X Y <input type="radio"/> N <input type="radio"/> NA<br>X Y <input type="radio"/> N <input type="radio"/> NA |
| 5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.  | X Y <input type="radio"/> N <input type="radio"/> NA   |
| 6. HEAD MEASURED AT PROPER LOCATION.   | X Y <input type="radio"/> N <input type="radio"/> NA   |
| 7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.   | X Y <input type="radio"/> N <input type="radio"/> 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) | X Y <input type="radio"/> N <input type="radio"/> NA |
|---|--|

**TOWN OF TAOS WASTEWATER TREATMENT PLANT**

**PERMIT NO. NM0024066**

**SECTION F - LABORATORY (CONT'D)**

- 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED Y N X NA
- 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. S X M U NA
- 4. QUALITY CONTROL PROCEDURES ADEQUATE. X S M U NA
- 5. DUPLICATE SAMPLES ARE ANALYZED. 0 % OF THE TIME.(For commercial laboratory analyses) O Y X N NA
- 6. SPIKED SAMPLES ARE ANALYZED. 10 % OF THE TIME. X Y N O NA
- 7. COMMERCIAL LABORATORY USED. X Y N NA

LAB NAME Hall Environmental CH2MHill OMI Analytical Laboratory Bio-Aquatics  
 LAB ADDRESS Albuquerque, NM Corvallis, Oregon Carrollton, TX  
 PARAMETERS PERFORMED BOD TN, TP, Hg, Ammonia WET Testing

**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.** X S M O 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 Receiving water is clear at discharge; however, at the ditch there is a lot of algal growth. time. No TMDL has been approved for limitations on Nitrogen or Phosphorus in this segment.

**SECTION H - SLUDGE DISPOSAL**

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

- 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. X S M U NA
- 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. X S M U NA
- 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A- Sludge is taken to the landfill in Rio Rancho. (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

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

- 1. SAMPLES OBTAINED THIS INSPECTION. Y N X 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

**Town of Taos Wastewater Treatment Plant (WWTP)**  
**Compliance Evaluation Inspection**  
**NPDES Permit No. NM0024066**  
**Inspection Date: March 19, 2015**

**Introduction:**

A compliance evaluation inspection (CEI) was conducted at the Taos Wastewater Treatment Plant (WWTP) on March 19, 2015 by Sandra Gabaldón and Mr. Daniel Valenta of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is a major facility classified under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned NPDES permit number NM0024066. The facility design flow is 2.0 million gallons a day (MGD).

The Taos WWTP discharges to an unnamed ditch, thence to the Rio Pueblo de Taos in NMAC Segment 20.6.4.122 of the Rio Grande Basin. The unnamed ditch is now classified as a perennial water in NMAC Segment 20.6.4.99. The designated uses include: Warmwater aquatic life, livestock watering, wildlife habitat, and primary contact.

The NMED performs a certain number of CEI's annually for the United States Environment Protection Agency (USEPA). The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with their NPDES permit. The enclosed inspection report is based on verbal information supplied by the permittee's representative, observations made by the NMED inspectors, and a review of records maintained by the permittee, commercial laboratory, and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative further explanations section of this report.

The inspector arrived at the facility at 0935 hours and conducted an entrance interview with the on-site supervisor, Mr. Jerome Salazar, Operator. Sandra Gabaldon, lead inspector, provided her credentials to Mr. Salazar and discussed the impending inspection, which included a tour of the facility, inspection of laboratory equipment and methods, and records review. Mr. Salazar gave the tour of the facility and explained the treatment scheme. Once completed, Mr. Anthony Martinez, Supervisor, had returned from a meeting and an explanation of the inspection was given to him as well. He was available to answer any questions at this time. Then, we began to discuss the laboratory. Ms. Celsa Vigil, Laboratory Tech, provided information for the laboratory as well as records. Closing interview was held with Mr. Anthony Martinez.

### Treatment Scheme:

The raw wastewater flows by gravity to the enclosed entrance works. The sewage is screened through parallel channels with mechanical bar screens and grinders. There is no manual bypass channel for influent flow. The removed solids are compacted by the grinder and screening process and sent to a hopper for final disposal at the Rio Rancho Landfill. Influent flow volume is measured past the bar screen, where it then enters the aerated grit chamber.

A septage receiving station is located at the head works. In order to protect the WWTP process, septage haulers must test their loads for pH before being allowed to dump the waste at the treatment plant. A log is kept of these loads and is also used for billing by the Town of Taos.

Flow is then directed through a splitter box that sends the wastewater to either the East or West aeration basin. The basins are from the old treatment plant. They have been reconfigured so that ½ of each basin has a series of fine bubble diffusers to create an aerated zone, and the other ½ of each basin has mixers only that constitute the anoxic zone. The water enters the basins in the anoxic zone and exits the basin past the aerobic zone. The east basin is currently off line due to some fine bubble diffusers inoperable at this time. The facility is working on repair of the diffusers at this time.

The partially treated wastewater then enters the Membrane Biological Reactor (MBR) system. The MBR consists of four basins with filters, aerators and mixers. The basins are run simultaneously. Return Activated Sludge (RAS) is sent back to the splitter box past the grit removal basin. Waste Activated Sludge (WAS) is pulled from the return line. Wasting of solids is done every day for one to five hours depending on flow and Mixed Liquor Suspended Solids (MLSS). The MBR system can accommodate a much higher MLSS than other activated sludge processes, from 7,000 mg/L to 13,000 mg/L according to operators. The processed water is called permeate water. Permeate water is continuously sent to the Ultraviolet Disinfection system prior to discharge.

The UV chamber consists of two banks of lights with 14 modules of 8 bulbs each, which are kept submerged by a weighted check dam. The lights are turned on 100% of the time. Following in the treatment train is a 12-inch Parshall flume and staff gauge with a secondary Drexelbrook flow measurement device. A portion of the flow is diverted to a golf course storage pond for reuse irrigation during the warm months of the year.

### Sludge Management:

Waste Activated Sludge (WAS) is pulled from the return line. Wasting of solids is done every day for one to five hours depending on flow and Mixed Liquor Suspended Solids (MLSS). The sludge that consists of 2% - 5% solids, is sent to the belt press for dewatering. A polymer coagulant is added to the solids. From the belt press solids are deposited into a large roll-off bin. When filled, the bin is transported to the Rio Rancho Landfill for final disposal.

**Town of Taos Wastewater Treatment Plant (WWTP)**  
**Compliance Evaluation Inspection**  
**NPDES Permit No. NM0024066**  
**Inspection Date: March 19, 2015**

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 Evaluation – Overall Rating of “Marginal”**

**Permit Requirements** for Recordkeeping and Reporting:

Part I, Section E of the Permit states:

*The permittee shall institute a program within 12 months of the effective date of the permit (June 1, 2013) 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. Preventative maintenance programs and equipment conditions and;*
- i. An overall evaluation of conditions at the facility.*

**Findings** for Recordkeeping and Reporting:

A facilities pollution prevention program should eliminate or reduce the generation of pollutants and wastes at the source by carefully considering material usage, production processes, and waste management practices. The facility's pollution prevention program should identify opportunities for reducing the use of hazardous materials and waste generation or releases, as well as opportunities to protect natural resources by conserving and efficiently using energy and water.

To be most effective, a facility's pollution prevention program should focus on implementing source reduction. Where source reduction cannot be achieved, reuse and recycling projects should be implemented. If there is no feasible pollution prevention alternative, treatment and disposal should be used as a last resort.

The permittee has not instituted a pollution prevention program within 12 months of the effective date of the permit as required in Part I, Section E.

The permittee does not have a spare parts and supplies inventory list maintained.

**Section C – Operations and Maintenance: Overall Rating of “Marginal”**

**Permit Requirements** for Operation and Maintenance:

Part III, Section B.3 states:

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.*

Part I, Section D states:

*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, Governor – Taos Pueblo, War Chief - Taos Pueblo, Environmental Program – Taos Pueblo, and NMED Surface Water Quality Bureau at (505) 827-0187, within 24 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, Governor – Taos Pueblo, War Chief - Taos Pueblo, Environmental Program – Taos Pueblo, and NMED Surface Water Quality Bureau within 5 days of the time the permittee becomes aware of the circumstance.*

Part II, E.6 states:

MONITORING FREQUENCY REDUCTION (For Ceriodaphnia dubia ONLY)

- a. *The permittee may apply for a testing frequency reduction upon the successful completion of the first four consecutive quarters of testing for the Ceriodaphnia dubia test species only, with no lethal or sub-lethal effects demonstrated at or below the critical dilution. If granted, the monitoring frequency for that test species may be reduced to not less than twice per year for the more sensitive Ceriodaphnia dubia test species.*
- b. *CERTIFICATION - The permittee must certify in writing that no test failures have occurred and that all tests meet all test acceptability criteria in item 3.a. above. In addition the permittee must provide a list with each test performed including test initiation date, species, NOECs for lethal and sub-lethal effects and the maximum coefficient of variation for the controls. Upon review and acceptance of this information the agency will issue a letter of confirmation of the monitoring frequency reduction. A copy of the letter will be forwarded to the agency's Permit Compliance System section to update the permit reporting requirements.*

**Findings** for Operations and Maintenance:

The permittee has had a manufacturing issue with their membranes elements. The membranes have broken consistently in the same location. Currently, approximately 20 membranes have had to be removed because of broken brackets. These spaces within the Membrane Bioreactor are left "blank", which decreases the efficiency of the MBR. The WWTP has contacted the manufacturer and they are in negotiations to get this issue resolved.

The east aeration basin is having some diffused aerators fixed. The basin is currently offline.

SSOs are discharges of wastewater (including that combined with rainfall induced infiltration/inflow) from a separate sanitary sewer prior to treatment at the wastewater treatment plant. SSOs typically release untreated sewage into basements or out of manholes and onto city streets, playgrounds, and into streams.

Sanitary sewer overflows (SSOs) from the collection system are not monitored by the WWTP. The Town of Taos has a separate department responsible for responding to any SSOs. However, any SSOs that occur within the collection system are not reported to the Taos Treatment Plant. It is imperative that communication between these two departments is made in order that all SSOs may be reported as required by the NPDES permit.

The Town of Taos WWTP has completed their first four consecutive quarters of testing for the Ceriodaphnia dubia test species only, with no lethal or sub-lethal effects demonstrated at or below the critical dilution. Therefore, the WWTP is eligible for a reduction in testing. The

facility should send a certified letter to EPA regarding their reduction. This will save the facility time and money.

### **Section E – Laboratory: Overall Rating of “Marginal”**

#### **Permit Requirements** for Laboratory:

Part III, Section 5 states:

##### *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:

The permittee has failed to implement an adequate analytical quality control program, including analyses of sufficient duplicate samples to insure the accuracy of all required analytical results. The permittee does not require the contracted commercial laboratory to perform at least 10% duplicate samples of BOD<sub>5</sub>, mercury, ammonia, phosphorus or nitrogen. The permittee does do 10% duplicate sampling for pH, TRC, TSS, E. coli and Fecal Coliform. These parameters are done in-house by CH2MHill, OMI.

On the day of the inspection, it was noted that the temperature of the TSS oven was below the required 103-105° F. The temperature was only 99°F. The permittee suggested that because operators are in and out of the laboratory, they may have bumped the dial on the oven. Once noted, the operator changed the temperature. The temperature should be checked daily when performing TSS analysis to insure 40 CFR 136 requirements are being met.

**NMED/SWQB  
Official Photograph Log  
Photo # 1**

Photographer: Daniel Valenta	Date: 03/19/2015	Time: 1056 Hours
City/County: Taos/Taos County		State: New Mexico
Location: Taos WWTP		
Subject: Septage haulers receiving station at the entrance works of the WWTP		



**NMED/SWQB**  
**Official Photograph Log**  
**Photo # 2**

Photographer: Daniel Valenta	Date: 03/19/2015	Time: 1101 Hours
City/County: Taos/Taos County		State: New Mexico
Location: Taos WWTP		
Subject: East Aeration Basin, currently offline		



**NMED/SWQB**  
**Official Photograph Log**  
**Photo # 3**

Photographer: Daniel Valenta	Date: 03/19/2015	Time: 1130 Hours
City/County: Taos/Taos County		State: New Mexico
Location: Taos WWTP		
Subject: Membrane element		



**NMED/SWQB**  
**Official Photograph Log**  
**Photo # 4**

Photographer: Daniel Valenta	Date: 03/19/2015	Time: 1151 Hours
City/County: Taos/Taos County		State: New Mexico
Location: Taos WWTP		
Subject: Discharge to unnamed ditch		

