



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**

May 1, 2014

Mayor Dale W. Janway  
City of Carlsbad  
P.O. Box 1569  
Carlsbad, NM 88221

**Re: City of Carlsbad Waste Water Treatment Plant; Major-Municipal; NPDES Compliance Evaluation; SIC 4952; NPDES Permit NM0026395; April 3, 2014**

Dear Mayor. Janway:

Enclosed, please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the Federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas  
US Environmental Protection Agency, Region VI  
Enforcement Branch (6EN-WM)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

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

Carlsbad WWTP  
May 1, 2014  
Page 2

If you have any questions about this inspection report, please contact Daniel Valenta at 505-827-2575 or at [daniel.valenta@state.nm.us](mailto:daniel.valenta@state.nm.us).

Sincerely,

*/s/Bruce 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, USEPA (6EN-WM) by e-mail  
Brent Larsen, USEPA (6WQ) by e-mail  
Racquel Douglas, USEPA (6EN-WM) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail  
NMED District III, Mike Kesler 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 6 3 9 5 11 12 1 4 0 4 0 3 17 18 C 19 S 20 1					
Remarks					
M A J O R	W W T P				
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 [ ] [ ] [ ] 69	70 3	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)	Entry Time /Date	Permit Effective Date
Carlsbad WWTP – From US 62- Hobbs Highway towards Hobbs, 2.5 miles SE of Carlsbad, right on county road 605 ( US Refinery Rd), then take next right on country Rd 606 (Blackfoot Rd), Eddy County, New Mexico 88221	0910/April 3, 2014	January 1, 2014
	Exit Time/Date	Permit Expiration Date
	1330/April 3, 2014	December 31, 2018
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
Joe Harvey, Wastewater & Collections Superintendent/ (575) 887-5412 Richard Aguilar, Superintendent of Environmental Services/ cell (575)-361-1347, (575)887-5412 Joe Ramirez/ Senior Lab Technician/ (575) 887-5412 Mark Goad/ Lab Technician/ (575) 887-5412	GPS: N. 32° 24' 34.91" W. -104° 10' 44.60"	
Name, Address of Responsible Official/Title/Phone and Fax Number	SIC: 4952 Activity code: TW	
Mr. Dale W. Janway, P.O. Box 1569, Carlsbad, NM 88221/ Mayor/(575) 887-1191 fax (575) 885-1101	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

#### Section C: Areas Evaluated During Inspection

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

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

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

1. SEE REPORT AND FURTHER EXPLANATIONS.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
DANIEL VALENTA /s/Daniel Valenta	NMED/SWQB 505-827-2575	5/1/2014
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
SARAH HOLCOMB /s/Sarah Holcomb	NMED/SWQB 505-827-2798	5/1/2014

**SECTION A - PERMIT VERIFICATION**

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS:  S  M  U  NA (FURTHER EXPLANATION ATTACHED **YES**)

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  
**EPA not notified of increase in the design flow rate.**

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 **NO**)

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. DETAILS:  S  M  U  NA (FURTHER EXPLANATION ATTACHED (**YES**))

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  N

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

**Spare parts inventory needs to be updated.**

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.  Y  N  NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. **New SOP need to be established to reflect the new upgrades.**  Y  N  NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. **New procedures need to be established to reflect the new upgrades.**  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. **Quarterly Aluminum sample not taken.**  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 No)  
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  Y  N  NA  
 TYPE OF DEVICE **18 inch 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  
**Drexelbrook USonic-R by Ametek in use.**
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION Quarterly)  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. 100 % OF THE TIME. ( Not for pH)  Y  N  NA
- 6. SPIKED SAMPLES ARE ANALYZED.    % OF THE TIME. **Sample for aluminum now required.**  Y  N  NA
- 7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME                      **BioAquatic Laboratories**  
 LAB ADDRESS                      **2501 Mayes Rd # 100, Carrollton, TX 75006-1378**  
 PARAMETERS PERFORMED            **Biomonitoring**

**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
<b>001</b>	<b>N0</b>	<b>N0</b>	<b>NO</b>	<b>N0</b>	<b>NO</b>	<b>CLEAR</b>	

RECEIVING WATER OBSERVATIONS: **Discharge pipe is high above receiving water, effluent cascades down to river.**

**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: \_\_\_\_\_ (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

**Compliance Evaluation Inspection  
Carlsbad Waste Water Treatment Plant  
NPDES Permit No. NM0026395  
April 3, 2014**

**Introduction**

On April 3, 2014 a Compliance Evaluation Inspection (CEI) was conducted at the City of Carlsbad Wastewater Treatment Plant (WWTP) by Mr. Daniel Valenta of the State of New Mexico Environment Department (NMED). This facility is classified as a Major Municipal under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned permit number NM0026395. According to the permit application the updated WWTP has a design flow capacity of 6.5 Million Gallons Day (MGD). The present permit lists the plant as a 5.0 MGD facility. The permit maintains the discharge limits of a 5.0 MGD facility.

This facility discharges to the Pecos River in Segment 20.6.4.202 (*State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC)*) of the Pecos River Basin. This segment has designed uses of industrial water supply, irrigation, livestock watering, wildlife habitat, secondary contact, and warm water aquatic life.

The NMED performs a certain number of CEI's for the U.S. Environmental Protection Agency (USEPA) each year. The purpose of this inspection is to provide USEPA with information to evaluate the permittee's compliance with the NPDES permit. This report is based on review of files maintained by the permittee and NMED, on-site observation by NMED personnel, and verbal information provided by the permittee's representative. Finding of the inspection are detailed on the attached EPA form 3560-3 and in the narrative Further Explanations section of the report.

At 0910 hours on April 3, 2014 the inspector arrived at the facility and made introductions, presented credentials and explained the purpose of this inspection to Mr. Joe Harvey, Wastewater & Collections Superintendent and Mr. Richard Aguilar, Superintendent of Environmental Services. The Inspector and Messrs. Harvey and Aguilar toured the facility; an exit interview to discuss preliminary findings was conducted at the WWTP office at 1330 hours on April 3, 2014.

**Treatment Scheme**

There are approximately 10 to 11 lift stations within the entire collection system. Seven of these lift stations feed directly to the primary lift station located at the west side of the Pecos River. All raw sewage from the City is lifted by this primary lift station to the WWTP on the east side of the Pecos River. The primary lift station is at the City's former WWTP. It has two lift pumps and backup power. The WWTP has a headworks that consists of an automatic bar screen, with an automatic overflow bypass to either of two primary clarifiers. Grit and screening are hauled to the landfill after being dried on the drying beds. The flow is divided between the two primary clarifiers, then combines and is treated in four aeration basins. The basins have both anoxic and aeration zones for nitrogen removal. The wastewater flows into two secondary clarifiers. After solids are dropped out in the two secondary clarifiers it flows through the dual bank UV system for final disinfection. The effluent flow is measured using an 18-inch Parshall flume with a secondary Drexelbrook flow totalizing meter. The final effluent is discharged to the Pecos River through an effluent pipeline above the river.

**Compliance Evaluation Inspection  
Carlsbad Waste Water Treatment Plant  
NPDES Permit No. NM0026395  
April 3, 2014**

**Sludge**

The sludge from the two primary clarifiers is pumped to the primary sludge digesters for anaerobic treatment. The Return activated Sludge (RAS) from the secondary clarifiers is pumped up to the head of the activated sludge basins. When wasting is necessary, the Waste Activated Sludge (WAS) can be directed to the belt thickener, or can be pumped back to the entrance works for resettling in the primary clarifiers. A polymer is added prior to the belt thickener for enhanced dewatering. The digester is heated by burning gas collected during primary digestion. It can be used to fuel one of the two recirculation water boilers. The second boiler is fueled by natural gas only; the first can be fueled by natural gas or digester gas.

The facility has solid bottom sludge beds with drains for decanting liquid. The decant water from the sludge beds is pumped back to the head of the WWTP, along with the decant water from the belt press. The sludge on the solids beds is mixed and turned to enhance drying using newly purchased equipment for turning compost solids. It is then stockpiled and composted to meet Class A pathogen reduction requirements. The composted sludge is used by the City golf course as well as other city properties.

**Further Explanations**

**Section A-Permit Verification-Overall Rating of “Unsatisfactory”**

Per Part II.C.c: Contributing Industries and Pretreatment Requirements

*c. The permittee shall provide adequate notice of the following:*

*Any new introduction of pollutants into the treatment works from an indirect discharger which would be subject to Sections 301 and 306 of the Act if it were directly discharging those pollutants; and*

*Any substantial change in the volume or character of pollutants being introduced into the treatment works by a source introducing pollutants into the treatment works at the time of issuance of the permit. Any notice shall include information on (i) the quality and quantity of effluent to be introduced into the treatment works, and (ii) any anticipated impact of the change on the quality or quantity of effluent to be discharged from the POTW.*

**Finding:** The facility at the time of the inspection is accepting waste from waste haulers at the WWTP at no charge. This free service, while being helpful to the community has been an incentive for other waste haulers beyond the community to truck their waste to the facility. This secondary waste stream may increase with the discharges becoming larger. The waste stream is only being tested for pH and oil/grease at the present time.

Many POTWs accept trucked wastes and, in a few instances, wastes received by train. As stipulated in 40 CFR 403.1(b)(1), pollutants from nondomestic sources that are transported to the POTW by truck or rail are also subject to the General Pretreatment Regulations. They may also be subject to categorical pretreatment standards. Therefore, hauled wastes from CIUs or hauled waste that otherwise qualifies the discharger as an IU must be regulated in accordance with the requirements of the General Pretreatment Regulations, including any applicable requirements for permitting and inspecting the generating facility. Hauled wastes, like wastes received through the collection system, have the potential to negatively affect the POTW, making regulatory control of the wastes necessary.

**Compliance Evaluation Inspection  
Carlsbad Waste Water Treatment Plant  
NPDES Permit No. NM0026395  
April 3, 2014**

Certain industrial discharge practices can interfere with the operation of POTWs, leading to the discharge of untreated or inadequately treated wastewater into rivers, lakes, and other waters of the United States. A discharge that causes *interference* inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use, or disposal and therefore causes a violation of any requirement of the POTW's NPDES permit.

Some pollutants are not amenable to biological wastewater treatment at POTWs and can pass through the treatment plant untreated. This *pass through* of pollutants affects the receiving water and might cause fish kills or other deleterious effects. Even when a POTW has the capability to remove toxic pollutants from wastewater, the pollutants can end up in the POTW's sewage sludge, which might then be processed into a fertilizer or soil conditioner that is land-applied to food crops, parks, or golf courses or elsewhere.

The General Pretreatment Regulations of the National Pretreatment Program require all large POTWs **(those designed to treat flows of more than 5 million gallons per day)** and smaller POTWs **(that accept wastewater from Industrial Users( IUs) that could affect the treatment plant or its discharges)** to establish local pretreatment programs. These local programs must enforce all national pretreatment standards found at 40 CFR 403 in addition to any more stringent local requirements necessary to protect site-specific conditions at the POTW. To renew their NPDES permit an application was submitted to NMED, October 12, 2010, and the EPA. In the application the design flow rate has been increased to 6.5 MGD from the old facilities design flow rate of 5.0 MGD. This increase over 5 MGD, see above, requires the City under 40 CFR 403 to establish a pretreatment program that meets these requirements. Information about establishing a Pretreatment Program can be found at: [http://cfpub.epa.gov/npdes/home.cfm?program\\_id=3](http://cfpub.epa.gov/npdes/home.cfm?program_id=3).

### **Section C-Operations and Maintenance – Overall Rating of “Unsatisfactory**

Per Part I.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 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 and NMED Surface Water Quality Bureau within 5 days of the time the permittee becomes aware of the circumstance.”*

**Compliance Evaluation Inspection  
 Carlsbad Waste Water Treatment Plant  
 NPDES Permit No. NM0026395  
 April 3, 2014**

**Finding:**

1. After speaking with the facility staff it appears they have not been reporting spills and overflows to the NMED Surface Water Quality Bureau as required above. On February 17, 2014 a spillage of approximately 1500 gallons of digested sludge occurred at the facility, no call or report was submitted to NMED.
2. A spill occurred at the WWTP when a lift station overflowed, (see photo 1). The spill was contained however no report was submitted to NMED.
3. Speaking with the staff minor spills have occurred in the city collection system. No reports have been filed with NMED as required above. Staff may have been unaware of this requirement with procedures discussed to correct this oversight.

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

Per Part I.A.1: Limitations and Monitoring Requirements

	<i>DISCHARGE LIMITATIONS</i>				<i>MONITORING REQUIREMENTS</i>	
	<i>lbs/day, unless</i>		<i>mg/l, unless noted (*2)</i>		<i>MEASUM</i>	<i>SAMPLE TYPE</i>
<i>POLLUTANT</i>	<i>30-DAY AVG</i>	<i>DAILY MAX</i>	<i>30-DAY AVG</i>	<i>DAILY MAX</i>	<i>FREQU</i>	
			*	*	<i>Daily</i>	
<i>Aluminum</i>	<i>Report</i>	<i>Report</i>	<i>Report</i>	<i>Report</i>	<i>once/quarter</i>	<i>Grab</i>
<i>E. coli Bacteria</i>	<i>n/a</i>	<i>n/a</i>	<i>126</i>	<i>410</i>	<i>once/week</i>	<i>Grab</i>

**Finding:**

1. The new permit became effective on January 1, 2014. No sample was collected or analyzed for aluminum during the first quarter of the year as was required in the new permit.
2. The permit limit for E. coli was exceeded during the month of May 2012. The permit limit was 410 cfu the sample tested 871 cfu. Facility staff believed the exceedences was due to the retrofitting building project going on at the time. No other exceedences have occurred since.

**NMED/SWQB  
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: April 3, 2014	Time: 0931 hours
City/County: Carlsbad, NM/Eddy County		
Location: Carlsbad WWTP 2.5 miles SE of Carlsbad, NM. facing northwest.		
Subject: All effluent from the cities collection system is pumped to the lift station. Station overflowed and was contained by the use of berms. Spill was not reported.		



**NMED/SWQB  
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: April 3, 2014	Time: 0935 hours
City/County: Carlsbad, NM/Eddy County		
Location: Carlsbad WWTP 2.5 miles SE of Carlsbad, NM. facing southwest.		
Subject: Influent is screened at the headworks and flows to the equalization basin. Here fluids from the dump station mix with influent from the city collection system.		



**NMED/SWQB  
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: April 3, 2014	Time: 0939 hours
City/County: Carlsbad, NM/Eddy County		
Location: Carlsbad WWTP 2.5 miles SE of Carlsbad, NM. facing north.		
Subject: Primary clarifier.		



**NMED/SWQB  
Official Photograph Log**

Photo # 4

Photographer: Daniel Valenta	Date: April 3, 2014	Time: 0951 hours
City/County: Carlsbad, NM/Eddy County		
Location: Carlsbad WWTP 2.5 miles SE of Carlsbad, NM. facing southwest.		
Subject: One of four aeration basins.		



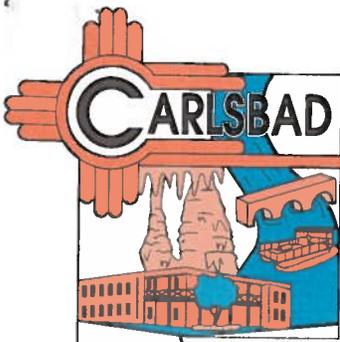
**NMED/SWQB  
Official Photograph Log**

Photo # 5

Photographer: Daniel Valenta	Date: April 3, 2014	Time: 1010 hours
City/County: Carlsbad, NM/Eddy County		
Location: Carlsbad WWTP 2.5 miles SE of Carlsbad, NM facing northwest.		
Subject: Secondary clarifier.		



Reply to Inspection received on June 4, 2014



*Daniel Valenta*

**DALE JANWAY**  
MAYOR

Post Office Box 1569  
Carlsbad, NM 88221-1569  
(575) 887-1191  
1-800-658-2713  
www.cityofcarlsbadnm.com

**STEVE MCCUTCHEON**  
CITY ADMINISTRATOR

May 28, 2014

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



Re: **NPDES Permit NM0026395** - Compliance Evaluation April 3, 2014

Dear Mr. Yurdin,

We recently received a written Compliance Evaluation done by Mr. Daniel Valenta. Below I have listed our responses to the unsatisfactory ratings we received.

**Section A-Permit Verification-Overall Rating of "Unsatisfactory"**

The reason stated for this unsatisfactory rating is that the permit application submitted to the EPA had the design flow at 6.5 MGD up from the 5 MGD of our previous permit. Mr. Valenta cites the 40 CFR 403 stating that since our design average flow rate has increased, we are now required to establish a pretreatment program that meets these standards. After doing extensive research I have no evidence that the design flow has changed at this facility. This treatment facility recently went through a much needed rehabilitation. No tank sizes were increased and all detention times stayed the same. The treatment plant rehabilitation was done by Mr. Wade Chacon of HDR Engineering Firm. Mr. Chacon has confirmed that the design flow did not change. Mr. Chacon's phone number is (505) 830-5457. I have attached a copy of the O&M sheet that plainly shows what the design flow is 4.2(mgd). Mr. Valenta is correct our permit application did have the 6.5(mgd) design flow. The person that filled out the application to renew the permit is no longer employed by the City of Carlsbad. We are not sure where this number came from. The only explanation I have is that we made an administrative error when filling out the application. We are asking that the number on the permit application be changed to the correct number 4.2(mgd) and that this unsatisfactory rating be lifted.

**Section C- Operations and Maintenance-Overall Rating "Unsatisfactory"**

Mr. Valenta states that when the city had a sludge spill of 1500 gallons on February 17, 2014 that no call or report was made to NMED. This is incorrect we made numerous calls to the NMED and we also called the EPA hot line. The mistake on our part was we did not call the proper department at the NMED and

**COUNCILORS**

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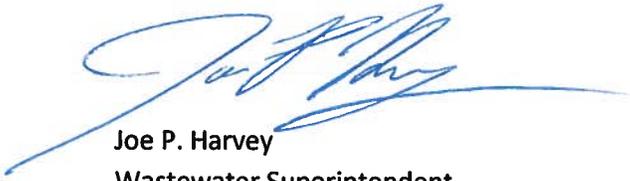
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that is our fault. We made a very reasonable effort to notify the proper authorities. Since the spill, we have put in place a procedure to notify the proper department at NMED in the event we have another spill. Also Procedures are in place to make the proper notification in the event we have a collections system overflow.

**Section D-Self-Monitoring-Overall Rating of "Unsatisfactory"**

Mr. Valenta is correct in stating that we did not sample for aluminum. When we realized that we needed to monitor for aluminum we took a sample at the beginning of April. We apologize for this mistake on our part. We have put a process in place to ensure that we sample aluminum every quarter in the future.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe P. Harvey", with a long horizontal flourish extending to the right.

**Joe P. Harvey**  
**Wastewater Superintendent**

xc: Racquel Douglas, USEPA, Region VI (6EN-WM)

**City of Carlsbad, NM**  
**Wastewater Treatment Facility**  
**Design Criteria Summary Table**

**Wastewater Flows**

Minimum Flow (mgd)	1.0
Current Flow (mgd)	2.2
Annual Average Design Flow (mgd)	4.2
Peak Hour Design Flow (mgd)	12.6

**Wastewater Loading**

	(lb/d)	(mg/L)
Annual Average Influent (BOD)	5,538	158
Annual Average Influent (TSS)	5,116	146
Annual Average Influent (NH4)	821	23
Annual Average Influent (TKN)	1,142	33
Maximum Month Influent (BOD)	7,663	181
Maximum Month Influent (TSS)	10,289	243
Maximum Month Influent (NH4)	1,072	25
Maximum Month Influent (TKN)	1,492	35

**Entrance Works**

**Influent Screen**

Influent Screen (SCR-0401)	
Number of Screens	1
Type	Perforated Plate
Size	6 mm
Max Flow Capacity	12.6 mgd
Brush Motor (Hp)	3
Screen Motor (Hp)	1

**Manual Bar Screen (Bypass Channel)**

Number of Screens	1
Spacing	1-1/2 inch

**Washer / Compactor (WC-0401)**

Number of Washer / Compactors	1
Screenings Loading (cf/hour)	150
Auger Motor (Hp)	3

**Grit Removal**

Type	Aerated
Number of Units	1
Grit Tank Volume (gal)	25,935