NEW MEXICO
ENVIRONMENT DEPARTMENT

SUSANA MARTINEZ
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JOHN A. SANCHEZ
Lieutenant Governor

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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

March 4, 2015

Mr. Bobby Towle
Operations Manager
New Mexico Water Service Company
401 Horner Street
Belen, New Mexico 87002

Re: Rio Communities Wastewater Treatment Plant; Minor; Individual Permit; SIC 4952; Compliance Evaluation Inspection; NPDES Permit NM0027782; February 20, 2015

Dear Mr. Towle:

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

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

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

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

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

Sincerely,

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

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

EPA

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

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	3	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	N	NM0027782			150220			C		S		1

Remarks: MINOR WWTP

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73		74	75	Reserved	80
				3		N		N						

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
RIO COMMUNITIES WWTP
In Belen, go east on NM309 (Renken Ave.) right on NM 7 for ¼ mile, right on NM 304 for 1 mile To Vista Grande Estates and turn right into subdivision on Chisum Road. Facility is a the end of Chisum Road - left side.

VALENCIA COUNTY

Entry Time /Date
1130 Hours / February 20, 2015

Permit Effective Date
June 1, 2014

Exit Time/Date
1330 Hours / February 20, 2015

Permit Expiration Date
May 31, 2019

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Bobby Towle, Operations Manager
Bryon Peters, Certified WW Operator, Level IV

Other Facility Data
SIC 4952

Name, Address of Responsible Official/Title/Phone and Fax Number
Mr. Robert Towle, Operations Manager / (505) 864-2218 / (505) 463-1395 (cell)
New Mexico Water Service Company
401 Horner Street
Belen, NM 87002

Contacted
Yes * No

N 34.63396
W -106.74036

Section C: Areas Evaluated During Inspection

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

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

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

Please see checklist and further explanations for details of findings

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sandra Gabaldón	NMED/SWQB/(505) 827-1041/(505) 827-0610	
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Michelle Lemon, Municipal Team Leader	NMED/SWQB/(505) 827-2795/(505) 827-2819	

New Mexico Water Service Company – Rio Communities	PERMIT NO: NM0027782

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS X S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED NO*)
DETAILS: Permit Issued June 1, 2014; Expires May 31, 2019

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE X Y ☐ N ☐ NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES ¨ Y ☐ N X NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT X Y ☐ N ☐ NA

4. ALL DISCHARGES ARE PERMITTED X Y ☐ N ☐ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ¨ S X M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED YES*)
DETAILS: The new permit requires DO monitoring. The permittee does not have a sufficient DO benchsheet that has all the information required. Please see further explanations.

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. X Y ¨ N ☐ NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. ¨ S X M ☐ U ☐ NA

a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING ¨ Y X N ☐ NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING ¨ Y X N ☐ NA

c) ANALYTICAL METHODS AND TECHNIQUES. O Y X N ☐ NA

d) RESULTS OF ANALYSES AND CALIBRATIONS. ¨ Y X N ☐ NA

e) DATES AND TIMES OF ANALYSES. ¨ Y X N ☐ NA

f) NAME OF PERSON(S) PERFORMING ANALYSES. ¨ Y X N ☐ NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. X S ☐ M ☐ U ☐ NA

4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. X S ☐ M ☐ U ☐ NA

5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. X Y ☐ N ☐ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. X S ☐ M ¨ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO)*
DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED. X S ☐ M O U ☐ NA

2. TREATMENT UNITS PROPERLY MAINTAINED. X S ☐ M O U ☐ NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED . X S ☐ M O U ☐ NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. X S ☐ M O U ☐ NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE X S ☐ M O U ☐ NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. X S ☐ M O U ☐ NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. X S ☐ M ☐ U ☐ NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. X Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. X Y O N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. X Y ☐ N ☐ NA

NEW MEXICO WATER SERVICE COMPANY – RIO COMMUNITIES	PERMIT NO. NM0027782

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	O Y X N ¨ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	O Y ¨ N X NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	O Y O N X NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	¨ Y X N ¨ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	¨ Y ¨ N X NA

SECTION D - SELF-MONITORING

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

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	X Y ¨ N ¨ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	X Y ¨ N ¨ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	X Y ¨ N ¨ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	X Y ¨ N ¨ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	X Y ¨ N ¨ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	X Y ¨ N ¨ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	X Y ¨ N ¨ NA
b) PROPER PRESERVATION TECHNIQUES USED.	¨ Y X N ¨ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	X 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?	X Y ¨ N ¨ NA

SECTION E - FLOW MEASUREMENT

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

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE : 6" Parshall Flume .	X Y ¨ N ¨ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	X Y ¨ N ¨ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	X Y ¨ N ¨ NA
4. CALIBRATION FREQUENCY ADEQUATE.	X Y ¨ N ¨ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	X Y ¨ N ¨ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	X Y ¨ N ¨ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	X Y ¨ N ¨ NA
6. HEAD MEASURED AT PROPER LOCATION.	X Y ¨ N ¨ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	X Y ¨ N ¨ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. X S ¨ M ¨ U ¨ NA *(FURTHER EXPLANATION ATTACHED NO)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	X Y ¨ N ¨ NA

New Mexico Water Service Company – Rio Communities	PERMIT NO. NM0027782

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. X S O M ¨ U ¨ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. X S ¨ M ¨ U ¨ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 100 % OF THE TIME. X Y ¨ N ¨ NA

6. SPIKED SAMPLES ARE ANALYZED. ___ % OF THE TIME. ¨ Y ¨ N X NA

7. COMMERCIAL LABORATORY USED. X Y ¨ N ¨ NA

LAB NAME Hall Environmental Analysis Laboratory	Wilkins Environmental Consulting & Laboratories
LAB ADDRESS 4901 Hawkins, NE; Albuquerque, NM 87109	832 NW 67th Street; Oklahoma City, OK 73116
PARAMETERS PERFORMED BOD, TSS, E. coli	Biomonitoring

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ¨ S X 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: See further explanations for permit limitation requirements.

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 (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

Compliance Evaluation Inspection
New Mexico Water Service Company
Rio Communities Wastewater Treatment Facility
NPDES permit No. NM0027782
Inspection Date: February 20, 2015

INTRODUCTION

A Compliance Evaluation Inspection (CEI) was conducted at the Rio Communities Wastewater Treatment Plant (WWTP) on February 20, 2015 by Sandra Gabaldón of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is a private domestic wastewater treatment 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 NM0027782. The facility design flow is 0.3 million gallons per day (MGD).

The Rio Communities discharges into the Rio Grande Basin in Segment 20.6.4.105 (NMAC State of New Mexico Standards for Interstate and Intrastate Surface Waters). Designated uses include: Irrigation, marginal warmwater aquatic life, livestock watering, public water supply, wildlife habitat and primary contact.

The inspector arrived at Rio Communities at 1130 hours and conducted an entrance interview with Mr. Byron Peters, Certified Operator Wastewater IV. The inspector made introductions, presented her credentials and discussed the purpose of the inspection with Mr. Peters. Mr. Bobby Towle, Operations Manager arrived shortly after introductions. An exit meeting was held with Mr. Towle and Mr. Peters at the facility at approximately 1300 hours. Ms. Gabaldón explained to Mr. Towle and Mr. Peters the preliminary findings of the inspections from both Rio Del Oro and Rio Communities Wastewater Treatment Plants. Ms. Gabaldón requested records from August 2014 for review.

The NMED performs a specific number of CEI's annually for the United States Environmental 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 representatives, observations made by Ms. Gabaldón, and a review of records maintained by the permittee, commercial laboratory, and/or NMED. Findings of the inspection are detailed in the attached EPA form 3560-3 and in the narrative further explanations section of the report.

TREATMENT SCHEME

The Rio Communities WWTP serves a population of approximately 2000. Currently, the treatment plant design flow is 0.3 MGD. Wastewater influent enters the facility via three lift stations. It proceeds through a stainless steel barscreen and enters a grit chamber. Debris from the headworks is collected into an on-site dumpster and disposed of at the landfill.

Wastewater then enters a wet well with two screw pumps and two submersible pumps. The screw pumps are used only in the event that the two submersible pumps fail. Next, the wastewater enters the aeration basin where it then proceeds to the clarifier. The effluent is disinfected prior to discharge by ultraviolet lights. Effluent flow is measured through a six inch Parshall flume with a secondary staff gage and an ultrasonic meter.

INDUSTRIAL USERS:

This facility accepts industrial waste from two industrial users. These include:

1. Clariant Corporation - Primary products manufactured include desiccant canisters and packets that are often found in bottles of pharmaceuticals, nutritionals and diagnostics. Also manufactured are tubes and desiccant closures for packaging effervescent tablets, desiccant bags for bulk packaging, and specialized barrier bottles. The products produced protect healthcare products from the damaging effects of excess moisture, without which drugs, vitamins, and supplements can lose their efficacy or have a reduced shelf life.

   This manufacture discharged a blue ink into the WWTP in April 2014, which caused some damage to the barscreen. Clariant has replaced the bar screen and has been notified of the issue. There were no exceedances of permit limits when this occurred. Mr. Towle talked to the facility and the facility has agreed to discontinue any discharge of pollutants which may impact the treatment of the influent at the plant.

2. Aristech Surfaces, which produces acrylic countertops.

3. Hydrocut, Inc. - Waterjet cutting service center, combined with fabrication, welding, CNC robotic welding, and machining expertise. Work is provided for machine shops, fabrication companies, landscape architects, defense contractors, movie production companies and artists.

4. Valencia Power Industrials - Peaking station providing grid support for Albuquerque and the surrounding area.

There is also a possibility that the industrial park will soon be home to a new clothing manufacture.

SLUDGE MANAGEMENT

Waste activated sludge (WAS) is sent to the sludge holding basin on a daily basis and then sent to a centrifuge for removal of decant. The sludge is then placed into a dumpster and is later transported to the landfill for final disposal. The decant from the sludge is sent back to the headworks for further treatment.

Compliance Evaluation Inspection
Rio Communities
NPDES Permit No. NM0027782
Inspection Date: February 20, 2015

FURTHER EXPLANATIONS:

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

Section B – Recordkeeping and Reporting Evaluation – Overall Rating of "Marginal"

Permit Requirements for Recordkeeping and Reporting:

The Permit in Part III, Section C.4:

> *Records 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.*

Findings for Recordkeeping and Reporting*:*

The newly issued permit has new limits for dissolved oxygen. Approved methods for dissolved oxygen can be found in 40 CFR 136. They have purchased a new YSI probe and have started doing their sampling requirements. However, they have not created a benchsheet with all the requirements of Part III, Section C.4 of the permit. This was discussed at the closing meeting. The facility will create a new benchsheet as soon as possible and begin recording the information in Part III, Section C.4.

For the last quarter of 2014, the permittee submitted a duplicate DMR for November and did not submit a DMR for December. The permitte should submit the DMR for December as soon as possible.

Section D – Self Monitoring – Overall Rating of "Marginal"

The permit requires in Part III. Monitoring Procedures:

a. *Monitoring must be conducted according to test procedure approve under 40 CFR 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 Self-Monitoring:

The BOD sample on August 20, 2014 had oxygen depletion on the method blanks that was greater than >0.2 mg/L. This may be an indication that something is wrong with the dilution water in the blanks. Contamination of the glassware may be an issue. However, excessive oxygen demand in the dilution water blank does not invalidate the data in the BOD test. The commercial laboratory should follow up with cleaning of the glassware and/or calibration of the DO meter.

Samples submitted to the commercial laboratory on August 20, 2014 had a temperature recorded at 8°C for BOD and TSS. This invalidates the analysis of these parameters. The holding temperature is ≤ 6°C for BOD and TSS. The holding temperature for E. coli is <10°C. The samples from August 20, 2014, for BOD and TSS should not be used for DMR reporting.

Section G – Effluent / Receiving Waters Observations – Overall Rating of "Marginal"

Permit Requirements for Effluent / Receiving Waters Observations:

A review of the DMRs for this facility (since issuance of new permit, June 1, 2014) show that the permittee failed to meet their permit limits for dissolved oxygen. The permittee has since implemented an aeration system prior to discharge to increase the dissolved oxygen.

The dissolved oxygen results are as follows:

DMR DATE:	Dissolved Oxygen mg/L	Permit Limit Minimum:
June 2014	1.75 mg/L	5.0 mg/L
July 2014	1.93 mg/L	5.0 mg/L

August 2014	1.48 mg/L	5.0 mg/L
September 2014	2.07 mg/L	5.0 mg/L
October 2014	1.90 mg/L	5.0 mg/L
November 2014	1.91 mg/L	5.0 mg/L
December 2014	Not submitted	5.0 mg/L

NEW MEXICO WATER SERVICE COMPANY

March 18, 2015

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

RE: COMPLIANCE EVALUATION INSPECTION (CEI), February 20, 2015
RIO COMMUNITIES WASTEWATER TREATMENT FACILITY
NPDES PERMIT NO. NM0027782

Dear Mr. Bruce Yurdin:

We are in receipt of your letter of February 20, 2015 concerning the referenced inspection. Listed below are the inadequacies that were noted during the inspection and included in the further explanations section of the report. Our response to items noted follows each listing.

Section B – Recordkeeping and Reporting Evaluation – overall Rating of "Marginal"

The Permit in Part III, Section C.4 states:

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;
f. The result of such analyses

Findings for Recordkeeping and Reporing:

The newly issued permit has new limits for dissolved oxygen. Approved methods for dissolved oxygen can be found in 40CFR 136. They have purchased a new YSI probe and have started doing their sampling requirements. However they have not created a benchsheet with all requirements of part III, Section C.4 of the permit. This was discussed at the closing meeting. The facility will create a new benchsheet as soon possible and begin recording the information in part III, Section C.4

For the last quarter of 2014, the permittee submitted a duplicate DMR for November and did not submit a DMR for December.

Action taken

Created new dissolved oxygen benchsheet (see attachment). Submitted the DMR for December 2014 on March 12, 2015 to EPA and NMED program manager.

Findings

BOD Samples taken in August 20, 2014 has an oxygen depletion on their method blanks that was greater than >0.2 mg/l.

Action Taken

Contacted Hall Environmental Analysis Laboratory, the lab we use, and talked to Manager Andy Freeman. Mr. Freeman acknowledged the problem, which they subsequently corrected.

Findings

Samples submitted to commercial laboratory on August 20, 2014 had temperature recorded at 8°C.

Action Taken

We had been using blue ice packs for temperature control, but are now utilizing ice for that purpose.

Section G – Effluent / Receiving Waters Observations – Overal Rating "Marginal"

:

Findings

Failed to meet permit parameters for dissolved oxygen.

Actions Taken

On December 11, 2014 installed new aeration system in contact basin in order to meet the new D.O limits.

Should you have any questions or comments regarding our response to your CEI findings of the Rio Communities Wastewater Treatment Facility, please contact me.

Sincerely,

Paul Risso
General Manager
New Mexico Water Service Company
505-864-2218 Ext. 226 (Office)
505-864-8438 (Fax)
505-264-4839 (cell)
prisso@newmexicowater.com

Cc Ron Hay
NMWSC File
Racquel Douglas (6EN-WM)

NEW MEXICO WATER SERVICE CO.

RIO COMMUNITIES WASTEWATER TREATMENT FACILITIES

DISSOLVED OXYGEN METER

D.O Benchsheet

DATE Calibrated	TIME Calibrated	Analyst	MEMBRANE CHANGED Yes / no	ELEVATION: 4820 Feet					
				Sample Location	Final DO (mg/L)	Analyses Date	Analyses Time	Sample Temperature c	CALIBRATE DO (mg/L)
				Prior to parshall flume					
				Prior to parshall flume					
				Prior to parshall flume					
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*Standard Methods'22th,Edition Section 4 membrane electrode method, page 142