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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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RYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

October 29, 2014

Mr. Efren Yturralde, Superintendent
Gadsden Independent School District # 16
Gadsden Administrative Complex
P.O. Drawer 70
Anthony, New Mexico 88021

Re: Minor Non Municipal; SIC 4952; Compliance Evaluation Inspection; Gadsden
Independent School District #16; NPDES Permit No.NM0028487, Anthony, New
Mexico, September 29, 2014

Dear Mr. Yturralde:

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

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,

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
Raquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN) by e-mail
NMED District III Manager 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 8 4 8 7 11 12 1 4 0 9 2 9 17 18 C 19 S 20 2					
Remarks					
G A D S D E N S C H O O L M I N O R N O N M U N I C					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 1 69	70 3	71 N	72 N	73	74 75 M I N O R 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) Gadsden Independent School District #16, P.O. Drawer 70 Middle School, 1301 W. Washington and High School, 6301 Highway 28 Drive, Anthony, NM 88021 Doña Ana County	Entry Time /Date 13:30 Hours / September 29, 2014	Permit Effective Date May 1, 2014
	Exit Time/Date 17:00 Hours / September 29, 2014	Permit Expiration Date April 30, 2019
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Alfredo Huguin / Gadsden ISD, Physical Plant Director/575-882-6200 Mr. Mario Apadoca / Gadsden ISD, WWTP Operator/575-621-5839 Mr. Raul Sanchez / Gadsden ISD, WWTP Operator / 575-882-6914	Other Facility Data LAT 31° 59' 56.03" LONG - 106° 38' 6.52" SIC 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Efren Yturralde, Superintendent Gadsden Administrative Complex, P.O. Drawer 70, Anthony, NM 88021/ Superintendent / 575-882-6203 or 882-6200	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)

S	Permit	U	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	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)

1. SEE REPORT AND FURTHER EXPLANATIONS.

Name(s) and Signature(s) of Inspector(s) <i>/S/ Barbara Cooney</i>	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212 / 505-827-0160	Date October 29, 2014
Signature of Management QA Reviewer <i>/S/ Shelly Lemon</i>	Agency/Office/Phone and Fax Numbers 505-827-0187 / 505-827-0160	Date October 29, 2014

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

 S M U NA (FURTHER EXPLANATION ATTACHED NO)

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE

 Y N NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES

 Y N NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT

 Y N NA

4. ALL DISCHARGES ARE PERMITTED

 Y N NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

 S M U NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS: Records missing information for the month of February 2014

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 NO)

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.

 S M U NA

2. TREATMENT UNITS PROPERLY MAINTAINED.

 S M U NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.

 S M U NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

 S M U NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE.

 S M U NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.

 S M U NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.

Not Evaluated

 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 NO __.)
 DETAILS:

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

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. Y N NA

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

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

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

6. SAMPLE COLLECTION PROCEDURES ADEQUATE Y N NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. Y N NA

b) PROPER PRESERVATION TECHNIQUES USED. Y N NA

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

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

SECTION E - FLOW MEASUREMENT

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

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.
 TYPE OF DEVICE Y N NA

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

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

4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION _____)
 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. Not Evaluated Y N NA
7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME Water Technology Associates

LAB ADDRESS 3400 S. Espina, Las Cruces

PARAMETERS PERFORMED BOD, TSS, pH, e Coli

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	NO	NO	NO	NO	NO	CLEAR	
01A (internal)	NO	NO	NO	NO	NO	CLEAR	
01B (internal)	NO	NO	NO	NO	NO	CLEAR	

RECEIVING WATER OBSERVATIONS

See Further Explanations.

SECTION H - SLUDGE DISPOSALSLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED NO).

DETAILS:

Solids removed by liquid waste hauler to South Central Regional WWTP

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

Introduction

On September 29, 2014, Barbara Cooney of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Gadsden Independent School District (ISD) # 16 Wastewater Treatment Plant (WWTP). The Gadsden ISD facility, consisting of two separate treatment plants with one at the High School and one at the Middle School, has a design flow capacity of 0.09 MGD (million gallons per day) and is classified as a minor non municipal discharger under the federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0028487 which regulates discharge of wastewater from Outfall 001 to the Rio Grande (Segment 20.6.4.101 State of New Mexico Standards for Interstate and Intrastate Surface Waters, New Mexico Administrative Code (NMAC)). This segment includes the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

Upon arrival at the WWTP at 13:30 hours September 2014, the inspector met with Mr. Alfredo Hogue - Gadsden ISD, Physical Plant Director, Mr. Mario Apadoca - WWTP Operator, and Mr. Raul Sanchez - WWTP Operator, showed her credentials, explained the purpose of the inspection and conducted the entrance interview. Mr. Apadoca and Mr. Sanchez accompanied the inspector on a tour of the facility. A review of records and the laboratory commenced thereafter. The inspector left the facility at 16:00 hours.

Treatment Scheme

Middle School

The Middle School Waste Water Treatment Plant (WWTP), oldest of the two treatment plants at this facility, was constructed in the 1970's. Recent work completed in December of 2009 at this plant included refurbishing the main lift station with submersible pumps, relining (re-coating) basins, and upgrading and replacing aeration pipes and diffusers.

Raw wastewater from the Middle School (approximately 1,000 students and faculty), cafeteria, supporting ISD buildings, on-site caretaker residence, and vehicle maintenance shop floor drains all drain to the WWTP. The influent enters the plant via a lift station east of the aeration basin. Both the Middle School cafeteria and ISD physical plant vehicle wash bays have grease traps before the lift station. The lift station is located in a covered building which pumps wastewater from a wet well to the aeration basin. A light alarm at the lift station is visible from the on-site caretaker residence.

Lifted wastewater then enters the treatment plant through a screening basket. Screenings are placed in buckets and allowed to dry for final disposal at a municipal solid waste landfill in Sunland Park, New Mexico. After being screened, the wastewater enters a rectangular, baffled aeration basin. Return Activated Sludge (RAS) from the clarifier is pumped to the head of the aeration basin. Air is provided by two blowers. The blowers provide the lift needed to continuously remove RAS to the aeration basin.

Floating material is removed manually from the clarifier. Flow leaving the clarifier then enters the chlorine contact chamber. Chlorination is provided by the chlorine (Calcium hypochlorite) pellet tube unit as the flow enters the chamber. Flow is measured leaving the chlorine contact chamber. As flow exits the chlorine contact chamber, it passes over a notched weir. The notch in the flow measurement weir did not appear "V"-shaped, but modified or worn down to a trapezoid. There was no channel box before the weir. After the weir, flow enters a pipe with a de-chlorination (Sodium sulfite) pellet tube unit. Piped effluent (Outfall 01A inside the facility) enters an open vertical concrete pipe then mixes with the effluent flow from the High School WWTP before discharging to the Rio Grande at Outfall 001.

High School

The High School WWTP was constructed in 1993 to accommodate increased flow at this facility. The design flow at this treatment plant is 55,000 gallons per day. The collection system includes 3 lift stations with alarm lights. Raw wastewater from the High School (approximately 2,070 students and faculty), cafeteria, vehicle shop, biology lab, chemical lab, and an on-site caretaker residence enters the plant via a lift station and passes through a static screen for solids removal. Similar to the Middle School WWTP, screenings are placed in buckets and allowed to dry for final disposal at municipal solid waste landfill in Sunland Park, New Mexico.

After the lift stations and screen, wastewater then enters an aeration basin. Aeration is provided by two blowers. The blowers provide lift for the RAS to be moved on a continuous basis back to the aeration basin. A diesel generator mounted on a trailer is located at the High School WWTP. Gadsden ISD has a contract for preventative maintenance and exercises the generator once each quarter.

Flow from the aeration basin enters a rectangular clarifier basin. Flow is measured after the clarifier before the chlorine contact chamber using a V-notch weir and ultrasonic transducer device. The weir is located in an open channel box and the transducer is located upstream of the weir. An automatic ISCO 4210 Ultrasonic Flow Meter was mounted in the pump and blower control room and displayed instantaneous flow rate, time, totalized flow and head measurement.

After measurement, flow passes through a chlorine pellet tube unit and then drops into a wet well. The chlorine contact chamber acts also as a lift station to pump treated effluent to the outfall line at the Middle School WWTP. Effluent is pumped in batches through a pipe to the Middle School WWTP. De-chlorination (Sodium sulfite) is accomplished when the effluent reaches the Middle School WWTP through a pellet unit. After de-chlorination, effluent (Outfall 01B inside the facility) enters the previously discussed open vertical concrete pipe then mixes with the effluent flow from the Middle School WWTP before discharging to the Rio Grande at Outfall 001.

Solids Management

Biosolids produced at the treatment plants are pumped out of the clarifiers on a monthly basis and transported by a contracted septic tank and cesspool service to the Doña Ana County South Central Regional WWTF.

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.

Record Keeping and Reporting

Overall Rating For Record Keeping and Reporting (Marginal)

Permit Requirements For Record Keeping and Reporting

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

4. Records Content

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.*

The permit requires:

NPDES PERMIT NO. NM0028487

Page 1 of PART I

PART I – REQUIREMENTS FOR NPDES PERMITS

A. LIMITATIONS AND MONITORING REQUIREMENTS

1. OUTFALL 001 - FINAL Effluent Limits – 0.09 MGD Design Flow

During the period beginning the effective date of the permit and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge treated domestic wastewater from Outfall 001 to Rio Grande River in Segment 20.6.4.101 of the Rio Grande Basin. Such discharges shall be limited and monitored by the permittee and reported as specified below:

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	6.6 s.u.	9.0 s.u.	1/week	Instantaneous Grab

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS	
	lbs/day, unless noted		mg/l, unless noted (*1)			MEASUREMENT FREQUENCY	SAMPLE TYPE
POLLUTANT	30-DAY AVG Report MGD	7-DAY AVG Report MGD	30-DAY AVG ***	7-DAY AVG ***	DAILY MAX ***		
Flow							
BOD ₅	22.5	33.8	N/A	N/A	N/A	1/Month	Grab (*2)
TSS	22.5	33.8	N/A	N/A	N/A	1/Month	Grab (*2)
E. coli bacteria (*3)	4.2x10 ⁸ cfu/day	N/A	126 cfu/100 ml	N/A	410 cfu/100 ml	1/Month	Grab
TRC	N/A	N/A	N/A	N/A	19 ug/l (*4)	1/week	Grab (*5)

EFFLUENT CHARACTERISTICS	DISCHARGE MONITORING		MONITORING REQUIREMENTS	
	30-DAY AVG	48-HR MINIMUM	MEASUREMENT FREQUENCY (*7)	SAMPLE TYPE
WHOLE EFFLUENT TOXICITY TESTING 48-HR ACUTE NOEC FRESHWATER (*6)	Report	Report	Once/5 year	Grab
Daphnia pulex	Report	Report	Once/5 year	Grab
Pimephales promelas	Report	Report	Once/5 year	Grab

Findings For Recordkeeping and Reporting:

1. A records review shows that the permittee is not correctly recording and maintain records for daily flows. The flow meters are recording only weekly average flows and monthly average flows. Daily flow values must be recorded and maintained. The permit required that flow readings of 7 day averages and 30 day averages be reported on the DMRs. Those flow averages must be calculated from the recorded daily values.

Self-Monitoring

Overall Rating For Self Monitoring (Satisfactory)

Operations and Maintenance

Overall Rating For Operations and Maintenance (Satisfactory)

Flow Measurement

Overall Rating for Flow Measurement (Unsatisfactory)

Permit Requirements For Flow Measurement

The permit states, in Part III.C.6

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 Measurements:

1. The totalizing flow meter is set to record weekly average and monthly average flows. It must be programed to record Daily flow values. See additional information in the section above, “**Findings For Recordkeeping and Reporting**”.

Laboratory

Overall Rating For Laboratory (Unsatisfactory)

Permit Requirements For Laboratory

The perm 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 measurements and shall maintain appropriate records of such activities.*

Findings For Laboratory:

1. The Total Residual Chlorine (TRC) records indicate exceedences for chlorine every month. These data are invalid. Upon a review of the sampling and analysis procedures it was found that the permittee was incorrectly calibrating the Hach chlorine meter, causing erroneously high results to be read and reported. The permittee has been instructed on proper calibration techniques as part of this inspection.

Effluent And Receiving Water

Overall Rating For Effluent And Receiving Water (Unsatisfactory)

Permit Requirements For Effluent And Receiving Water:

PART I – REQUIREMENTS FOR NPDES PERMITS

A. LIMITATIONS AND MONITORING REQUIREMENTS

1. OUTFALL 001 - FINAL Effluent Limits – 0.09 MGD Design Flow

During the period beginning the effective date of the permit and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge treated domestic wastewater from Outfall 001 to Rio Grande River in Segment 20.6.4.101 of the Rio Grande Basin. Such discharges shall be limited and monitored by the permittee and reported as specified below:

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	6.6 s.u.	9.0 s.u.	1/week	Instantaneous Grab

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS	
	lbs/day, unless noted		mg/l, unless noted (*1)			MEASUREMENT FREQUENCY	SAMPLE TYPE
POLLUTANT	30-DAY AVG	7-DAY AVG	30-DAY AVG	7-DAY AVG	DAILY MAX		
Flow	Report MGD	Report MGD	***	***	***	Daily	Totaled from internal outfall flows
BOD ₅	22.5	33.8	N/A	N/A	N/A	1/Month	Grab (*2)
TSS	22.5	33.8	N/A	N/A	N/A	1/Month	Grab (*2)
E. coli bacteria (*3)	4.2x10 ⁸ cfu/day	N/A	126 cfu/100 ml	N/A	410 cfu/100 ml	1/Month	Grab
TRC	N/A	N/A	N/A	N/A	19 ug/l (*4)	1/week	Grab (*5)

EFFLUENT CHARACTERISTICS	DISCHARGE MONITORING		MONITORING REQUIREMENTS	
	30-DAY AVG	48-HR MINIMUM	MEASUREMENT FREQUENCY (*7)	SAMPLE TYPE
WHOLE EFFLUENT TOXICITY TESTING 48-HR ACUTE NOEC FRESHWATER (*6)	Report	Report	Once/5 year	Grab
Daphnia pulex	Report	Report	Once/5 year	Grab
Pimephales promelas	Report	Report	Once/5 year	Grab

Findings For Effluent And Receiving Water:

2. Effluent Exceedences September 2013. Note these are listed in descending order with the most recent listed first.

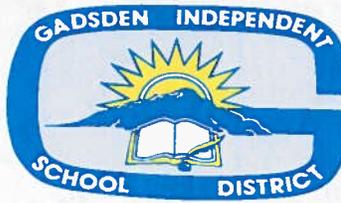
Date	Parameter	Effluent Exceedence	Permit Limit
June 2014	Total Residual TRC Daily Max Outfall 001A	50 µg/Liter (sample invalid calibration)	19 µg/Liter
June 2014	TSS % Removal Outfall 01AA	67%	>85%
May 2014	Total Residual TRC Daily Max Outfall 001A	40 µg/Liter (sample invalid calibration)	19 µg/Liter
April 2014	Total Residual TRC Daily Max Outfall 001A	40 µg/Liter (sample invalid calibration)	19 µg/Liter
April 2014	BOD % Removal Outfall 01B	19%	>85%
April 2014	TSS % Removal Outfall 01B	39%	>85%
January 2014	E coli Bacteria 30 Day Average Outfall 001A	145 cfu	126 cfu
January 2014	E coli Bacteria Daily Max Outfall 001A	460 cfu	410 cfu
December 2013	E coli bacteria 30 Day Average Max Outfall 001A	155 cfu	126 cfu
October 2013	TSS 30 Day Average	34.4 mg/L	30 mg/L

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	Outfall 01BA		
September 2013	TSS 30 Day Avg Outfall 01BA	52.8 mg/L	30 mg/L
September 2013	TSS Daily Max Outfall 01BA	52.8 mg/L	45 mg/L

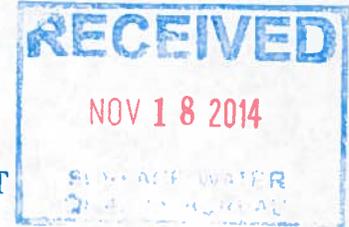
SLUDGE HANDLING

Overall Rating For Sludge Handling (Satisfactory)



Alfredo C. Holguin
Physical Plant Director

PHYSICAL PLANT DEPARTMENT
P.O. DRAWER 70 /1325 W. WASHINGTON
ANTHONY, NM 88021
PHONE: (575)-882-6903 FAX: (575)-882-2508



SENT VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

November 13, 2014

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87507

Re: Compliance Evaluation Inspection; Gadsden Independent School District #16;
NPDES Permit No. NMD028487

Dear Mr. Yurdin

The problems identified in the compliance evaluation report noted above have been or will be addressed by the district in the following manner.

Section B: Record Keeping and Reporting Evaluation

-The flow meter has been reprogrammed. It is now recording Daily Flow Values- (Average and maximum).

Section E-Flow Measurement

- The re-programming of the flow meter will now provide the correct data for flow measurement.
- The flow meter was calibrated on September 8, 2014, by Ted D. Miller and Associates and is calibrated annually.

Section F. Laboratory

-Have begun using appropriate blank sample water to zero out Hach chlorine meter as per inspectors directions.



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Section G-Effluent Receiving Waters

The proper calibration of the Hach chlorine meter has begun to generate accurate results (TRC) which are more in line with permit limits. The influent flow at the high school is intermittent with very low or no flows during extended weekends and holidays. The school is also currently under total remodel. This along with science labs which, sometimes dispose of harmful chemicals, will on occasion affect plant bacteria and cause populations to drop causing problems meeting other effluent parameters.

The district is currently working with its consultant engineers Bohannon Huston on a project to upgrade the disinfection system to UV which will eliminate the chlorine problems and help with other parameters.

Respectfully,

Alfredo C. Holguin
Physical Plant Director

xc: Raquel Douglas, US EPA
Efren Yturalde, Superintendent
Mario Apodaca, Water and Wastewater Technician
Raul Sanchez, Water and Wastewater Technician