



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



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Cabinet Secretary
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Deputy Secretary

Certified Mail - Return Receipt Requested

June 11, 2015

Ms. Debi Lee, Village Manager
Village of Ruidoso
313 Cree Meadows Drive
Ruidoso, New Mexico 88345

Re: Village of Ruidoso/Alto Water Treatment Plant; Minor Non-Municipal; SIC 4941; NPDES Compliance Evaluation Inspection; NM0028533; May 14, 2015

Dear Ms. Lee:

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 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

Alto Water Treatment Plant
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If you have any questions about this inspection report, please contact Daniel Valenta at (505) 827-2575 or at 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



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	5	3	3	11	12	1	5	0	5	1	4	17	18	C	19	S	20	2			
Remarks																															
W A T E R T R E A T M E N T P L A N T																															
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----															
67						70						71		72		73		74		75		76		77		78		79		80	

Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i>		Entry Time /Date 0830 hours/5-14-2015		Permit Effective Date 9/1/2012	
Village of Ruidoso, Alto Water Treatment Plant, 103 Via Auguila, Ruidoso, New Mexico. Lincoln County.		Exit Time/Date 1400 hours/5-14-2015		Permit Expiration Date 8/31/2017	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
Randy Koehn/Water Production Manager / 575-257-5525 ex 2056 Gary Goss/Water Production Operator/ 575-551-1304 Frank Candelaria/Water Operator/575-937-4642				GPS: N. 33° 23' 42" W. -105° 40' 12"	
Name, Address of Responsible Official/Title/Phone and Fax Number				Contacted	
Debi Lee, Village Manager, Village of Ruidoso, 313 Cree Meadows Drive, Ruidoso, New Mexico 88345 / Village Manager / 575-258-4343 or 1-877-700-4343				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
SIC: 4941					

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
U	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	U	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 ATTACHED 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		6/11/2015	
Signature of QA Reviewer		Agency/Office/Phone and Fax Numbers		Date	
Sarah Holcomb /s/Sarah Holcomb		NMED/SWQB 505-827-2798		6/11/2015	

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED No)

- 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. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED Yes)

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. **No Discharges** 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 No)

- 1. TREATMENT UNITS PROPERLY OPERATED. **No Discharges** S M U NA
- 2. TREATMENT UNITS PROPERLY MAINTAINED. S M U NA
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. **Outside power plant brought in.** S M U NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. S M U NA
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE S M U NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. S M U NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. S M U NA
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. Y N NA
 STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. Y N NA
 PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. Y N NA

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

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

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No),
 DETAILS: **No Discharges**

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 No)
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE **Inline Totalized Flow Meter**
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. **Factory Calibration** Y N NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. **No calibration** Y N NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. **No calibration** 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 No)
 DETAILS:

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

**Village of Ruidoso – Alto WTP
Compliance Evaluation Inspection
NPDES No NM0028533
May 14, 2015**

Further Explanations

On May 14, 2015 Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Village of Ruidoso, Alto Crest Water Treatment Plant (WTP) No. 3 at 103 Via Auguila (formerly Eagle Way), Ruidoso near Alto in Lincoln County, New Mexico.

The WTP is classified as a minor industrial 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 NM0028533 which authorizes discharge of treated backwash water to unclassified Eagle Creek, 20.6.4.98, thence to Devils Canyon, thence to Rio Ruidoso, thence to Rio Hondo, in Segment 20.6.4.208 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, New Mexico Administrative Code (NMAC)* of the Pecos River Basin. Devils Canyon is a tributary of the Rio Ruidoso from Rio Bonito to US Hwy 70 Bridge. This segment of Rio Ruidoso includes the designated uses of fish culture, irrigation, livestock watering, wildlife habitat, coldwater aquatic life and primary contact.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with the NPDES permit. 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 plant at approximately 0830 hours, the inspector made introductions, explained the purpose of the inspection, and presented credentials to Messrs. Gary Goss and Randy Kocha. The inspector and Messrs. Gary Goss and Randy Kocha toured the plant, including the outfall location below Alto Crest Reservoir. An exit interview to discuss preliminary findings was conducted with Messrs. Gary Goss and Randy Kocha at the WTP. The inspector left the WTP at approximately 1400 hours on the day of this inspection.

Treatment Scheme and Compliance Monitoring

Alto Crest WTP No. 3, is one of two plants providing drinking water for the Village. The source of raw water is now only groundwater. It used to include surface water and discharge from the Alto Crest reservoir. At one time Copper sulfate was used for algae control at Alto Crest reservoir. Due to only the use of groundwater at the facility very little solids are removed from the water. With the limited need to backflush no discharges to Eagle have occurred thus no samples have been obtained.

This plant utilizes a mixed media filtration system as well as chlorination for treatment of drinking water. Drinking water treatment processes include coagulation, flocculation, sedimentation and filtration. Chlorine treated water is used during filter backwash. The timing of the backwash process varies and is controlled by on-site operators. Backwash operations did not occur during this inspection. In addition, chlorine treated water is continuously run through the plant's pipe system to minimize scale build up in. Filter backwash, process water, and continuous flows are de-chlorinated using Sodium Sulfite tablets at the plant.

**Village of Ruidoso – Alto WTP
Compliance Evaluation Inspection
NPDES No NM0028533
May 14, 2015**

Flows are then carried via a pipeline to an excavated sedimentation basin (two joined channels or loops) located downstream of Alto Crest Reservoir adjacent to Eagle Creek. The basin channels join with a headgate outlet above Eagle Creek. Grit from the basin is periodically cleaned out. Samples for compliance monitoring would be taken from the flow entering the headgate. An in-line meter would measure any discharge from the settling pond.

The EPA is encouraging permittees to transition from submitting DMR's as paper copies to the NetDMR system. Information on NetDMR training information can be found at: <https://netdmr.zendesk.com/home>

Section B - Recordkeeping and Reporting Evaluation – Overall Rating of “Unsatisfactory”
Compliance Schedule – Overall Rating of “Unsatisfactory”

Per Permit Requirements Part I. Section B- Schedule of Compliance

“The permittee shall comply with the following schedule of activities for the attainment of water quality standards-based final effluent limitations for Cadmium at Outfall 001:

- 1. Determine exceedance cause(s) no later than six (6) months from the effective date of the permit;*
- 2. Develop control options no later than one (1) year from the effective date of the permit;*
- 3. Implement corrective action and attain final effluent limitations no later than three (3) years from the effective date of the permit.*

The permittee shall submit quarterly progress reports by January 1, April 1, July 1, and October 1. The requirement to submit quarterly progress reports shall expire three (3) years from the effective date of the permit.

The quarterly progress reports shall include a discussion of the interim requirements that have been completed at the time of the report and shall address the progress towards attaining the water quality standards-based final effluent limitations no later than three (3) years from the effective date of the permit.

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date. Any reports of noncompliance shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.”

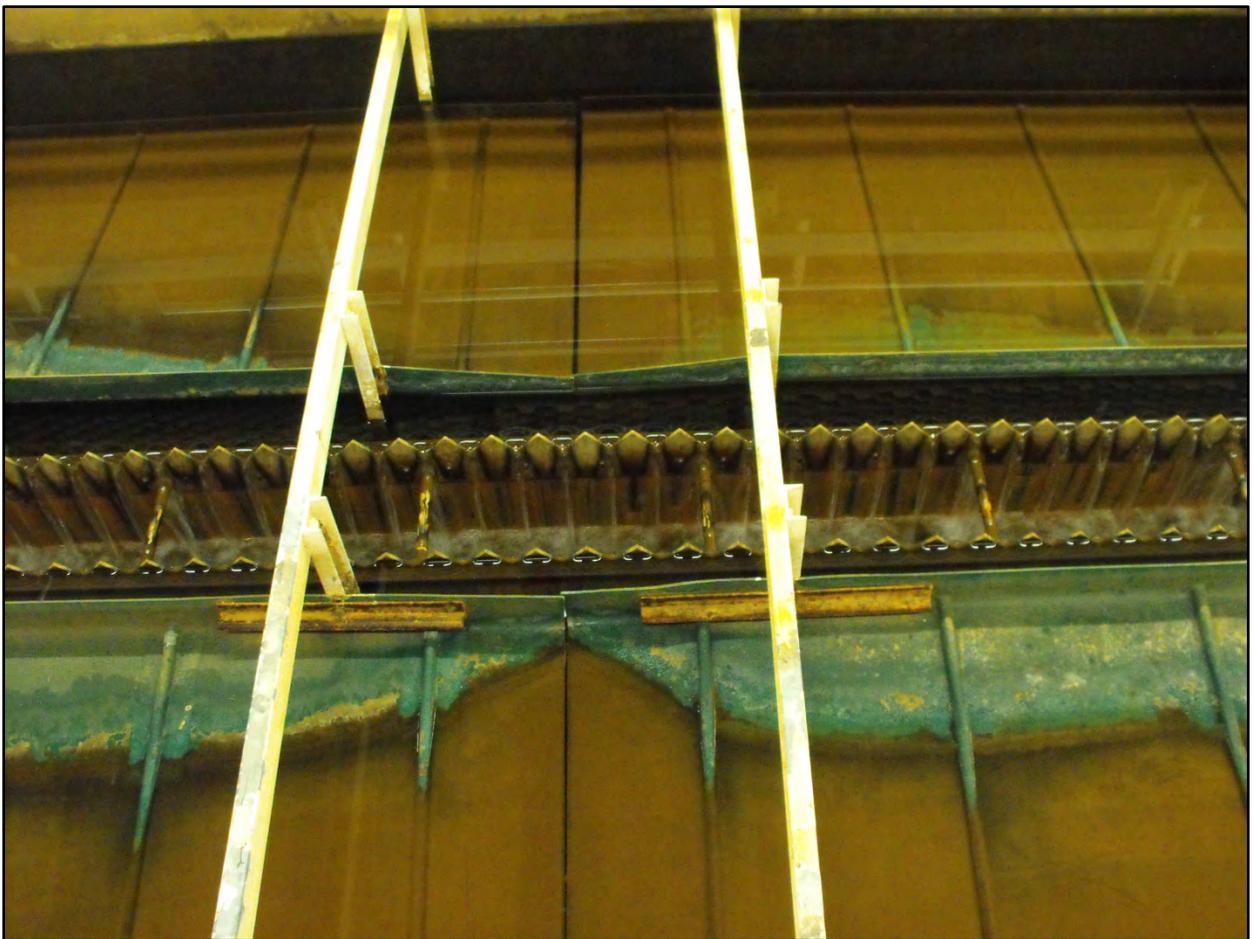
Findings: for Recordkeeping and Reporting:

The permit became effective September 1, 2012. None of the above required reports were submitted to the State. It is unknown if EPA has received any documents. During the discussions at the facility it was suggested they would like to include surface water into the treatment process once again. This inclusion may increase the need to backflush the filters and increase the discharge volumes to the waste holding ditches.

**NMED/SWQB
Official Photograph Log**

Photo # 1

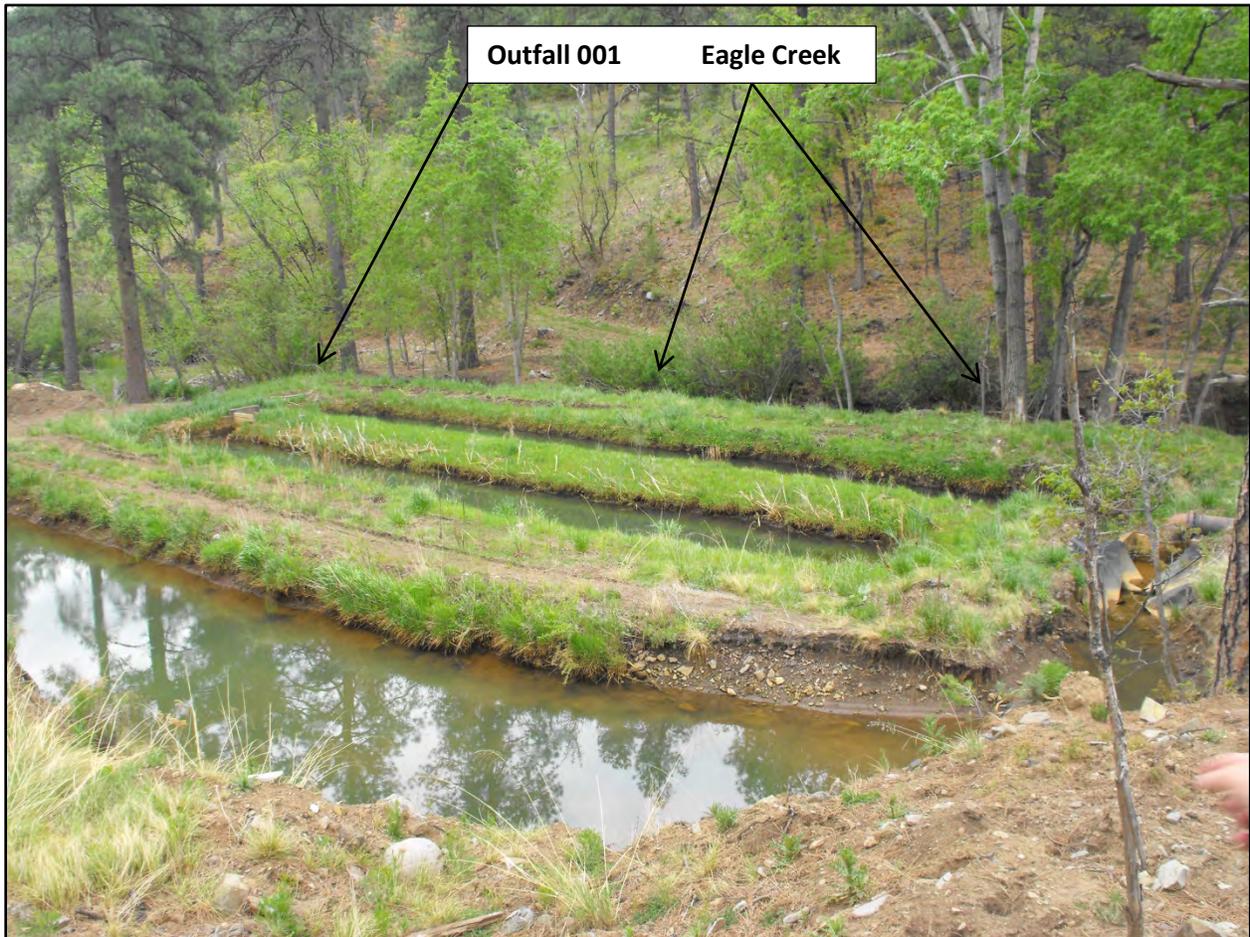
Photographer: Daniel Valenta	Date: 5/14/2015	Time: 0909 hours
City/County: Ruidoso/Lincoln		
Location: Alto Water Treatment Plant, 103 Via Auguila, Ruidoso, facing northeast.		
Subject: Using ground water as source water, the plant produces very little solid waste.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 5/14/2015	Time: 0909 hours
City/County: Ruidoso/Lincoln		
Location: Alto Water Treatment Plant, 103 Via Aguila, Ruidoso, facing southeast.		
Subject: WTP backflush settling basins.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 5/14/2015	Time: 0936 hours
City/County: Ruidoso/Lincoln		
Location: WTP backflush settling basins. Alto Water Treatment Plant, 103 Via Auguila, Ruidoso, facing southeast.		
Subject: Discharge pipe into the settling basins. Note the brown staining.		



**NMED/SWQB
Official Photograph Log**

Photo # 4

Photographer: Daniel Valenta	Date: 5/14/2015	Time: 0945 hours
City/County: Ruidoso/Lincoln		
Location: WTP backflush settling basins, Alto Water Treatment Plant, 103 Via Auguila, Ruidoso, facing southeast.		
Subject: Outfall 001 to Eagle creek.		

