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Governor

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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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RYAN FLYNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

ERIKA SCHWENDER
Director

Certified Mail - Return Receipt Requested

July 30, 2013

Mr. Reeves McGuire, General Manager
CDS Rainmakers Utilities, LLC
P.O. Box 1128
Alto, New Mexico 88312

**Re: Minor Non-Municipal; SIC 4952; CDS Rainmakers Utilities, LLC; NPDES Compliance
Evaluation Inspection; NM0029238; July 10, 2013**

Dear Mr. McGuire:

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.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the Further Explanations section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald
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

CDS Rainmakers Utilities, LLC
NPDES CEI Permit NM0029238

If you have any questions about this inspection report, please contact me at (505) 827-2575 or daniel.valenta@state.nm.us.

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Environmental Scientist/Specialist
Surface Water Quality Bureau

Cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Larry Giglio, USEPA (6WQ-PP) by e-mail
Hannah Branning, USEPA (6EN-WC) by e-mail
Jan Walker, USEPA (6EN) by e-mail
NMED District III, Frank Ford 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	9	2	3	8	11	12	1	3	0	7	1	0	17	18	C	19	S	20	1
Remarks																												
W A S T E W A T E R T R E A 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 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 14:25/ July 10, 2013		Permit Effective Date November 1, 2012	
CDS Rain Makers Utilities, LLC WWTP is at intersection of Custer's Last Stand Rd & Little Creek Rd, approx.. 8 miles North of Ruidoso, NM. From NM 48, turn east on NM222, travel 4 miles, turn south on CR D003, turn south on Little Creek Rd, pass condos, travel 2.5 miles to facility on left.		Exit Time/Date 1700/July 10, 2013		Permit Expiration Date October 31, 2017	
Lincoln County					
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
Weston (Wes) Laymon/ Facility Operator/ 575-336-4488/575-937-6362				GPS:	
Name, Address of Responsible Official/Title/Phone and Fax Number				N. 33.422890, W -105.574261 SIC 4952	
Mr. Reeves McGuire, CDS Rainmakers Utilities, LLC, P.O. Box 1128, Alto, New Mexico 88312/ General Manager/575-336-7500/505-681-4000 fax 575-336-4486				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	M	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
U	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	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)		Agency/Office/Telephone/Fax		Date	
DANIEL VALENTA /s/Daniel Valenta		NMED/SWQB 505-827-2575		7/30/2013	
Signature of Management QA Reviewer		Agency/Office/Phone and Fax Numbers		Date	
BRUCE YURDIN /s/Bruce Yurdin		NMED/SWQB 505-827-2795		7/30/2013	

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. S M U NA (FURTHER EXPLANATION ATTACHED *Yes.*)

- 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
 Loading not calculated using daily flow data.

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. S M U NA
- 2. TREATMENT UNITS PROPERLY MAINTAINED. S M U NA
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. **No backup power.** S M U NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. **Warning light at facility.** 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 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. 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. Y N NA
 TYPE OF DEVICE **2" Rockwell International Inline Meter**
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED **No Secondary** Y N NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION _____) **No Calibration** 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. 0 % OF THE TIME. **No Duplicate Samples Analyzed** Y N NA
- 6. SPIKED SAMPLES ARE ANALYZED. % OF THE TIME. Y N NA
- 7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME	Aqua Environmental Testing Laboratory 103 Via Aguila Ruidoso Las Cruces, NM	Bio-Aquatic Testing, Inc. 2501 Mayes Rd. Ste. 100 Carrollton, TX 75006
LAB ADDRESS		
PARAMETERS PERFORMED	BOD-TSS-E Coli	WET Test

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
001	No	No	No	No	Some	Clear	

RECEIVING WATER OBSERVATIONS: **Water clear with no smell.**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED *No*).
 DETAILS: **Sludge is sent to Ruidoso 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 **No Samples Taken** (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

CDS Rain Makers Utilities, LLC
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Compliance Evaluation Inspection
July 10, 2013

Further Explanations

Introduction

On July 10, 2013, Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the CDS Rain Makers Utilities, LLC Waste Water Treatment Plant (WWTP) northeast of Alto in Lincoln County, New Mexico. The facility treats domestic sewage from a housing development and has a design flow capacity of 0.04 MGD (million gallons per day). The facility 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 NM0029238 which regulates discharge of treated effluent from outfall 001 to Little Creek, thence to Eagle Creek, thence to the Rio Ruidoso (Rio Bonito to US Hwy 70 Bridge) in Segment 20.6.4.208 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, New Mexico Administrative Code (NMAC)*.

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 Permittees compliance with the NPDES permit. This inspection report is based on information provided by the Permittees representatives, observations made by the NMED inspectors, and records and reports kept by the Permittee and/or NMED. Upon the inspector's arrival at the WWTP at approximately 1425 hours and he was met by Mr. Laymon. The inspector made introductions, presented credentials and explained the purpose of the inspection. The inspector and Mr. Laymon toured the plant. Following the inspection, an exit interview to discuss preliminary findings was conducted with Mr. Laymon at CDS Rainmakers Utilities, LLC offices. The inspector left the facility at approximately 1700 hours on the day of this inspection.

Treatment Scheme

CDS Rain Makers Utilities, LLC WWTP, was constructed in 1983, it serves approximately 250 connections from Rancho Ruidoso Valley Estates Subdivision, including condominiums, and Rainmakers Golf Community. The State of New Mexico 20.7.4 NMAC Regulations for Wastewater and Water Supply Facilities per 20.7.4.13 require an operator be a certified Waste Water Level 3 for a secondary treatment, aeration treatment facility if the population served is over 500. The facility operator Mr. Laymon is a certified Waste Water Level II. As the Rancho Ruidoso Valley Estates grows when the population served is over 500 it will trigger the need for a WWTP Level 3 Operator.

The treatment process consists of an extended aeration activated sludge system with de-nitrification. Raw sewage gravity flows through the collection system and enters a single lift station that pumps influent into the plant headworks. The lift station is equipped with a high level alarm and Sensaphone call-back system. A magnetic flow meter is installed at the headworks. A wire basket and aluminum bar screen (1- inch gaps) collects solids at the headworks. The headworks includes a drying deck for debris. Collected grit and solids are placed in lined trash container, transported to a dumpster at the Rainmakers offices for disposal by Lincoln County Solid Waste Authority.

After the headworks, wastewater flows sequentially through seven aeration basins before entering a de-nitrification tank followed by an aeration tank. The facility has two blowers (one on duty, one on standby). The facility has a back up generator, but it is not operational.

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Following the aeration tank, wastewater is sent through a splitter box into two separate clarifiers. Sludge collected in the clarifiers is routed to aeration basin #1 at the headworks, where it either remains in the system as Return Activated Sludge (RAS) or goes to the aerobic sludge digester as Waste Activated Sludge (WAS). Following the clarifiers, partially treated wastewater is recombined where it flows to a single cell, synthetically-lined lagoon (approximately 5 million gallons). The aerated lagoon serves as an evaporation pond, for polishing, and holding.

A float system is used in the lagoon to control flow. At a certain level, flow is pumped out of the lagoon to three polishing bag filters (200 micron each) then ultraviolet (UV) disinfection system. Flow can be diverted to one of the two UV light banks (one 6 and one 8 bulb units) UV lights are manually cleaned. Flow is measured with a totalizing meter before discharge to Little Creek. Samples for effluent compliance monitoring are taken from a sampling port in the effluent line before discharge to outfall 001. The facility also has a NMED Ground Water Quality Bureau (GWQB) Discharge Permit (DP-313) that allows discharge into Little Creek.

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Section B - Recordkeeping and Reporting Evaluation – Overall Rating of “U = Unsatisfactory”

Section D - Self-Monitoring – Overall Rating of “U = Unsatisfactory”

Section F – Laboratory – Overall Rating of “U = Unsatisfactory”

Permit Requirements for Self-Monitoring and Laboratory

Part III.B.3.a (Standard Conditions, Proper Operation and Maintenance) of the permit states, *“Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.”*

Part III.C.5 (Standard Conditions, Monitoring Procedures) of the permit states:

a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.

c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

Part III. C. 2 (Representative Sampling) of the permit states:

Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.

Finding

This facility is being operated by a single operator. A new permit became effective on November 1, 2012 that has some new reporting requirements. These are now being incorporated into the daily SOP's.

- The facility uses UV for the final treatment before discharging. Chlorine is being used to suppress the growth of algae. The permit requires testing for TRC five times a week when chlorine is being used. The chlorine meter reports sample measurements in mg/l the reporting requirement in the permit is in ug/l. After speaking to the operator concerning the chlorine meter it appears the conversion from mg/l to ug/l was not completed before reporting the information on DMR's, see attached spreadsheet. TRC values on the spreadsheet have been converted to ug/l. The listed MQL for TRC is 33µg/L.

$$1 \text{ mg} = 1,000 \text{ ug}$$

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- The TRC meter is being used to test the drinking water as well as used at the WWTP. The test measurement used in drinking water is Free Chlorine. The testing measurement used to measure TRC in WWTP's is Total Chlorine. The test method used at the WWTP was Free Chlorine not Total Chlorine. The reported TRC numbers are the Free Chlorine not the Total Chlorine.
- It is not documented that sample collection procedures are adequate for bacteria monitoring. As previously discussed, there is a potential for chlorine to be in the effluent. Preservation requirements in Table IA-Bacterial Tests of 40 CFR 136.3 states, "Add a reducing agent only if an oxidant (e.g., chlorine) is present." Proper preservation techniques, in this case 0.0008% Na₂S₂O₃ to de-chlorinate the sample, were not documented on reviewed records.
- The permit has a mass loading requirement for BOD and TSS. Reviewing past DMR's and bench sheets the calculation used to get the reportable loading was not performed correctly. The MGD values used in the calculation were the monthly averages not the flow on the day of sampling.

$$\text{BOD (mg/l)} \times \text{MGD (Day of Sampling)} \times 8.34 = \text{loading (lbs/day)}$$

$$\text{TSS (mg/l)} \times \text{MGD (Day of Sampling)} \times 8.34 = \text{Load (lbs/day)}$$

- USEPA approved Standard Method 4500-H+ B requires a three buffer standardization to adjust the response of the glass electrode prior to sample analysis. SM 4500-H+ B 20th edition states, "When only occasional pH measurements are made standardize instrument before each measurement." Buffers used to standardize the instrument were expired since April 2013.
- The permit requires BOD be sampled once a month. The sample has been taken not at the end of treatment process as the samples for TRC, E Coli, pH, and TSS were. The sample is taken from the clarifier discharge to the pond. This sampling point may not meet the above requirement for representative sample for the monitored activity.
- The permit requires flow to be measured daily. These measurements reported as the 30-day average, monthly maximum flow, and highest 7 day average. The operator has recorded the daily measurements and posted them in a excel spread sheet. However the only flow measurement reported is the monthly average, see attached spreadsheet.

USEPA Region 6 NPDES Reporting Requirements Handbook states:

How do I calculate and report 7-day averages? We recognize that calendar weeks and calendar months rarely coincide. Therefore, for the purpose of calculating and reporting 7-day averages, you should follow the process below: a. Define your week (SUN-SAT, MON-SUN, etc.). b. Calculate the averages of all sample data obtained for each week. c. The highest calculated weekly average will be reported on the DMR for the month in which (1) the week ends or (2) the week begins, or (3) the month which contains the greatest number of days. It is the choice of the facility. However, the choice should be consistent month to month, year to year. SET A RULE AND STICK WITH IT.

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Section E - Flow Measurement – Overall Rating of “M= Marginal”

Permit Requirements for Flow Measurement

Part III, Section C.5.b of the permit states:

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.

Part III, Section C.6 of the permit states:

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 Measurement

There were no flow measurement calibration records or other measurements to verify accuracy and reliability readily available. Flow measurement accuracy is important because this information is used to calculate BOD5 and TSS mass loading calculations. USEPA's NPDES Inspection Manual, Chapter 6 states, "The facility must ensure that their flow measurement systems are calibrated by a qualified source at least once a year to ensure their accuracy."

**NMED/SWQB
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 7/10/2013	Time: 1517 hours
City/County: Rancho Ruidoso Valley Estates near Alto, NM/Lincoln County		
Location: Rancho Ruidoso Valley Estates WWTP, facing northeast.		
Subject: Outfall 001 into Little creek next to a playground.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 7/10/2013	Time: 1443 hours
City/County: Rancho Ruidoso Valley Estates near Alto, NM/Lincoln County		
Location: Rancho Ruidoso Valley Estates WWTP, facing southwest.		
Subject: Houses have been built around the WWTP.		



