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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

December 24, 2014

Mr. Kurt M. Moffat, Utilities Manager
CRRUA Sunland Park
P.O. Box 429
Sunland Park, New Mexico 88063

Re: Major Municipal; SIC 4952; Compliance Evaluation Inspection; CRRUA Sunland Park
Wastewater Treatment Plant; NPDES Permit No. NM0029483; November 20, 2014

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

CRRUA Sunland Park
December 24, 2014
Page 2

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,
/S/ 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
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Raquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN) by e-mail
NMED District III, 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 4 8 3 11 12 1 4 1 1 2 0 17 18 C 19 S 20 1					
Remarks					
M A J O R M U N I C I P A L C R R U A S U N L A N D					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 1 69	70 2	71 N 72 N 73	74 75	80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Camino Real Regional Utility Authority (CRRUA) Sunland Park WWTP 1000 McNutt Road Sunland Park, NM 88063 Dona Ana County	Entry Time /Date 11:00 Hours / November 20, 2014	Permit Effective Date 1 October 2007
	Exit Time/Date 16:30 Hours / November 20, 2014	Permit Expiration Date 30 September 2012 Administratively Extended
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Ernesto (Ernie) Carranza, Lead Operator 575-647-7142 or 915-238-8739 Fax 575-525-6199	Other Facility Data SIC CODE 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Kurt Moffat Operations Manager 575-525-6193 / or 575-647-7142 fax 575-526-6199 Camino Real Regional Utility Authority (CRRUA) Sunland Park WWTP 1000 McNutt Road Sunland Park, NM 88063	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Outfall at Rio Grande River Coordinates in Decimal Degrees Latitude: N31.79866 Longitude: W106.55733

Section C: Areas Evaluated During Inspection

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

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

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

SEE THE FURTHER EXPLANATIONS SECTIONS OF THE ATTACHED REPORT

Name(s) and Signature(s) of Inspector(s) /s/ BARBARA COONEY	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212 / 505-827-0160	Date 12-24-2014
Signature of Management QA Reviewer /s/ SHELLY LEMON	Agency/Office/Phone and Fax Numbers 505-827-0187 / 505-827-0160	Date 12-24-2014

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

 S M U NA (FURTHER EXPLANATION ATTACHED YES)

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: Some records were not available for the inspector for review during and after the inspection

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. Not Evaluated

 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 Yes)

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. Lift station alarm system was not functioning at time of Inspection.

 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 Not Evaluated.

 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? Notification was not made until after NMED contacted the facility on one incident.

 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.
DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED No.)

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 NA7. 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.
DETAILS: Flow records were not provided during the inspection. S M U NA (FURTHER EXPLANATION ATTACHED Yes.)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 NA4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION Unknown) 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.
DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED No.)

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

LAB NAME Water Technology Associates (Doug Roby) Bio Aquatics

3501 Mesilla Hills Dr. Carrolton, TX

LAB ADDRESS Las Cruces, NM 88005

PARAMETERS PERFORMED BOD, TSS, E coli

Whole Effluent Toxicity

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

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
O1	None	None	None	None	None	Very slight green	NA

RECEIVING WATER OBSERVATIONS Effluent Exceedences, see Further Explanations Section of the report.

SECTION H - SLUDGE DISPOSALSLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED Yes.)
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. S M U NA
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. S M U NA
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: Surface Disposal (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 November 20, 2014 a Compliance Evaluation Inspection (CEI) was conducted at the Camino Real Regional Utility Authority (CRRUA) Sunland Park Wastewater Treatment Plant (WWTP) by Barbara Cooney of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The inspection was conducted by NMED for the US Environmental Protection Agency (USEPA), Region VI, under the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the Federal Clean Water Act. These inspections are conducted under contract with the USEPA and are used by USEPA to evaluate compliance with the NPDES permit program. This inspection report is based on information supplied by the CRRUA representatives (the permittee), observations made by the NMED inspectors, reports and records kept by the permittee and/or NMED.

The CRRUA - Sunland Park WWTP is classified as a major municipal discharger under the Federal Clean Water Act (CWA), section 402 NPDES permit program, and is assigned NPDES permit number NM0029483. The Standard Industrial Classification Code (SIC) is 4952. The facility is permitted for a design flow of 2.0 Million Gallons per Day (MGD). The discharge for the WWTP enters the Rio Grande in Water Quality Segment 20.6.4.101 NMAC at Latitude N 31.79866, Longitude W 106.55733. The designated uses for this segment of the river are: irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat, and primary contact.

Inspection Details

The inspector arrived at the CRRUA Sunland Park WWTP at 11:00 hours and met with Mr. Ernesto (Ernie) Carranza, lead operator. Mr. Kurt Moffat, Operations Manager was called by Mr. Carranza, and was unavailable for the inspection and for an exit interview the following morning. The inspector showed her credentials and explained the purpose of the inspection. Mr. Carranza accompanied the inspector on a tour of the facility and of three lift stations in the collection system. A records review was conducted following the plant tour. Additional records were requested by the inspector. Some of the records, though not all requested were provided. The inspector left the facility at 16:30 hours.

Treatment Scheme

Wastewater flows by gravity and with the aid of 20 lift stations for both Sunland Park and the Santa Teresa WWTP. At the treatment plant a main lift station carries the raw sewage up to the treatment units. The flow is through the entrance works which consists of an automatic bar screen with a manual backup and a grit removal chamber. Solids collected from the bar screen and grit chamber are disposed in the local landfill. The lift station is attached to an alarm system which protects against overflow problems. An additional lift station has been constructed near the Sunland Park North (Santa Teresa) Wastewater Treatment Plant, which is used to transport wastewater to the Sunland Park facility, for treatment.

The wastewater flow then enters the aeration basin. Air is provided by four blowers. Two blowers run continuously while one is resting and these units are alternated on a daily basis. Wastewater flows to two circular final clarifiers from the aeration basin.

Contents of the final clarifier are discharged to the ultraviolet (UV) disinfection unit, chlorine is also being added though no de-chlorination is conducted. The treated water proceeds through an effluent flow box. The effluent flow is measured using a 12 inch Parshall flume, an instantaneous flow meter and totalizer. Samples for NPDES permit monitoring are collected from this unit. The flow is then discharged via an underground pipe to the Rio Grande in Segment 20.6.4.101 NMAC of the Rio Grande Basin.

Return Activated Sludge (RAS) is sent back to the aeration basin from the final clarifiers.

Solids

Waste Activated Sludge (WAS) is pumped to the sludge thickener and then to the four cell aerobic digester. Sludge from the digester is then pumped to the belt filter press. Pressed sludge is placed into a truck to be transported to the local landfill. The belt filter press is operated on a daily basis for approximately 4 hours. Presently the drying beds are used as a backup only for this facility in case the belt filter press goes down. A polymer is added to the sludge as it enters the belt filter press to allow for greater separation of the water and solids. Dried sludge is hauled to the local landfill where it is stockpiled and then mixed with cover dirt for disposal in the landfill. The sludge disposal site is restricted from public access.

Further Explanations

Note: The sections are arranged according to the format of USEPA Form 3560-3 and checklist, attached, rather than being ranked in order of importance.

Permit

Overall Rating For Permit Verification (Satisfactory)

The permit was effective on October 1, 2007 through September 30, 2012. This permit has been administratively extended by the EPA following the submittal of the renewal permit application by the permittee. The proposed new permit was posted for public notice and comment by EPA on October 24, 2014. The comment period closed on November 26, 2014. EPA is expected to issue the renewed permit in the near future.

Record Keeping and Reporting

Overall Rating For Record Keeping and Reporting (Unsatisfactory)

Permit Requirements For Record Keeping and Reporting

The permit requires, in III. C. Monitoring and Records

1. Inspection and Entry

The permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and other documents as may be required by the law to:

- a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;*
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;*

- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this permit; and*
- d. Sample or monitor at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized by the Act, any substances or parameters at any location.*

The permit requires, in III. C. Monitoring and Records

D. REPORTING REQUIREMENTS

1. PLANNED CHANGES

b. MUNICIPAL PERMITS

Any change in the facility discharge (including the introduction of any new source or significant discharge or significant changes in the quantity or quality of existing discharges of pollutants) must be reported to the permitting authority. In no case are any new connections, increased flows, or significant changes in influent quality permitted that will cause violation of the effluent limitations specified herein.

7. TWENTY-FOUR HOUR REPORTING

a. The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall be provided within 5 days of the time the permittee becomes aware of the circumstances. The report shall contain the following information:

- (1) A description of the noncompliance and its cause;*
- (2) The period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and,*
- (3) Steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.*

b. The following shall be included as information which must be reported within 24 hours:

- (1) Any unanticipated bypass which exceeds any effluent limitation in the permit;*
- (2) Any upset which exceeds any effluent limitation in the permit; and,*
- (3) Violation of a maximum daily discharge limitation for any of*

The permit requires in Part I. D.

OVERFLOW REPORTING:

The permittee shall report all overflows with the Discharge Monitoring Report submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; observed environmental impacts from the overflow; actions taken to address the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary).

Findings For Recordkeeping and Reporting

1. Collection system – sewer overflows.

A sewer overflow was reported to NMED by a concerned citizen on February 5, 2015. The volume of this spill remains unknown. Photos show it extended more than 100 feet down the road and saturated

the dirt surface road. In an email from Kurt Moffat CRRUA to Barbara Cooney of NMED on February 6, 2014, Mr. Moffat stated that a report was sent to EPA and to NMED. NMED does not have record of receiving that report. The facility representative did follow up with information after being contacted by NMED regarding this incident. The permit requires 24 hour oral reporting.

2. Not all facility and laboratory records were available at the time of the inspection. The operator in charge of laboratory analysis and records was on leave the day of the inspection. The new plant manager Mr. Carranza provided all those records he could find at the time. Though, other records were not received via email or fax following the inspection as requested by the inspector, including daily flow records.

3. According to the DMRs chlorine for disinfection has been in use since March 2014. It was noted on the DMRs for that month. This is a change in operation at the facility and was reported as required above.

The EPA is encouraging permittees to transition from submitting DMRs as paper copies to the NetDMR system. Information on the NetDMR training can be found at:

<http://epa.gov/netdmr/about/training.html>

Operations And Maintenance

Overall Rating For Operation and Maintenance (Unsatisfactory)

Permit Requirements For Operation And Maintenance

The permit requires in Part III. B.

3. Proper Operations and Maintenance

a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner that which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the condition of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

Findings For Operation and Maintenance

1. Headworks Mechanical bar screen – out of operation.
2. Headworks Grit Removal system – out of operation.

3. Aeration Basins heavily overloaded with foam and solids. The basins have evidence of over flows including over the outside of the entire basins system (see attached photos).
4. Sanitary Sewer Overflows & Collection system – sewer overflows at the man hole near Santa Teresa, called the Dias Lago spill from January 30, 2014 through February 6, 2014 (see attached photos).
5. Collection system – lift stations – inadequate alarm systems. No back up power, evidence of past overflows based on debris seen around the lift station. Three lift stations were visited as part of the inspection, the Racetrack liftstation, the Santa Teresa lift station and the Dias Lago lift station (see attached photos).
6. Solids Belt press out of operation. The belt has rips and tears (see attached photos).
7. Ultraviolet Disinfection not functioning at full operation. Some of the light banks were off line.
8. Chlorine dosing is being done with a barrell turned on it's side at the front end of the UV basin. This is dangerous and no containment is present in the event of a spill (see attached photos).
9. No Dechlorination.
10. Inadequate operational staff. The facility has gone through numerous staff changes at every level in the last few years and there have been periods of management by untrained and staff lacking in experience during the time since the last NMED inpection in August 2013. The conditions at the treatment plant have deteriorated significantly since that time. The Level 4 Wastewater Operator, is also acting as lead operator for other facilities through CRRUA, as well as the signatory for CRRUA. According to facility representatives the Level 4 Operator is rarely on site and rarely directly involved in operations at the Sunland Park WWTP. However he does fill out the Discharge Monitoring Reports (DMRs). The lead operator who oversaw plant operations for the last year has left and the facility has numerous equipment failures and shows overall decline in general maintenance under that management. This facility and the CRRUA organization is understaffed to meet the demands of not only operations and maintenance but general management. More trained staff is needed.
11. Debris on the ground outside of of the aerated grit chamber and around the grit hopper.
12. Overall housekeeping at the WWTP and the lift stations in the collection system showed debris on the ground and declining conditions (see attached photos).
13. Lift station from the Santa Teresa WWTP that transports partially processed wastewater to the Sunland Park WWTP was inspected. Raw sewage mixed with oil from the generators was pooling on the ground (see attached photos). There was evidence of overflows from the lift station that extended beyond the fenced in area.

14. Final Clarifiers had a small amount of floating solids that indicate older sludge and inadequate wasting of solids (see attached photo). The clarifier weirs were clean and free of algae and collected solids. An operator was cleaning the weirs the day of the inspection.

15. Evidence of Hydraulic overload – overflows from the aeration basin. Though the plant design is at 2.0 MGD, and flows recorded are less than that at 7 day averages of 1.53 MGD, overflows from the aeration basins indicate both overloading of solids and overloading of total wastewater volume (see attached photos). This facility cannot accept and effectively treat any high volumes of wastewater in its current condition.

Self-Monitoring

Overall Rating For Self Monitoring (Satisfactory)

Flow Measurement

Overall Rating For Flow Measurement (Unsatisfactory)

Permit Requirements For Flow Measurements:

The permit requires in Part III C. 6. FLOW MEASUREMENTS:

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 flow with a maximum deviation 10% from true discharge rates throughout the range of expected discharge volumes.

Findings For Flow Measurements

Records that were requested were not provided therefore a finding of Unsatisfactory is assigned to this section of the report.

Laboratory

Overall Rating For Laboratory (Not Evaluated)

Effluent And Receiving Water

Overall Rating For Effluent And Receiving Water (Marginal)

Permit Requirements For Effluent And Receiving Water

The permit requires in Part I Table

E. coli Bacteria 30 Day Average: 126 colony forming units (cfu)/100 ml
E. coli Bacteria Daily Maximum: 410 colony forming units (cfu)/100 ml

Findings for Effluent and Receiving Water

October 2014	E.coli Daily Maximum	20,000 cfu/100 ml
April 2014	E.coli Daily Maximum	411 cfu/100 ml
March 2014	E. coli Daily Maximum	920 cfu/100 ml
December 2013	E.coli Daily Maximum	700 cfu/100 ml

SLUDGE HANDLING

Overall Rating For Sludge Handling (Unsatisfactory)

Permit Requirements for Sludge Handling:

The permit requires in Part IV

MAJOR - SEWAGE SLUDGE REQUIREMENTS INSTRUCTIONS TO PERMITTEES

Select only those Elements and Sections which apply to your sludge reuse or disposal practice. If your facility utilizes more than one type of disposal or reuse method (for example, Element I and Element II apply) or the quality of your sludge varies (for example, Section II and Section III of Element I apply) use a separate Discharge Monitoring Report (DMR) for each Section that is applicable.

The sludge DMRs shall be due by February 19th of each year and shall cover the previous January through December time period. (The sludge DMRs for permits in Texas shall be due by September 1 of each year, with the reporting period of August 1 to July 31)

Findings for Sludge Handling:

1. The DMRs for the sludge monitoring for January 2014 have the wrong year dated on them.
2. Sludge handling equipment is out of operation. The sludge dewatering belt press is torn and broken. This is adding to the entire WWTP being overloaded with solids. This condition if not corrected is likely to result in reduced effluent quality.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Google Earth

Date: July 18, 2013

Time: Unknown

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Aerial View of the facility.



Outfall at the Rio Grande

NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:08 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Dias Lago Lift Station

Subject: Dias Lago Lift Station – no backup power and no alarm system.



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:09 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Dias Lago Lift Station

Subject: Dias Lago Lift Station – there is litter blown in around the area. There is also indication of overflows from in the debris on the ground.



NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:09 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: - CRRUA Sunland Park Wastewater Treatment Plant - Dias Lago Lift Station

Subject: Dias Lago Lift Station – there is litter blown in around the area. There is also indication of overflows from in the debris on the ground.



NMED/SWQB
Official Photograph Log
Photo # 5

Photographer: Zach Libbin, EBID

Date: February 6, 2014

Time: Unknown

City/County: Sunland Park / Dona Ana County

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Man hole - near Santa Teresa (in Sunland Park, NM) Dias Lago spill

Subject: Man hole Dias Lago spill.



NMED/SWQB
Official Photograph Log
Photo # 6

Photographer: E. Caranza, CRRUA

Date: February 6, 2014

Time: Unknown

City/County: Sunland Park / Dona Ana County

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Man hole - near Santa Teresa (in Sunland Park, NM) Dias Lago spill

Subject: Man hole - Dias Lago spill cleanup completed and road graded on February 6, 2014



NMED/SWQB
Official Photograph Log
Photo # 7

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:16 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Dias Lago manhole

Subject: Manhole - Dias Lago – Ten months after the sewer overflow, the area has been cleaned and is free of any apparent sewage debris.



NMED/SWQB
Official Photograph Log
Photo # 8

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:16 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Dias Lago manhole

Subject: Another view - Dias Lago – Ten months after the sewer overflow, the area has been cleaned and is free of any apparent sewage debris.



NMED/SWQB
Official Photograph Log
Photo # 9

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:27 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Santa Teresa Lift Station

Subject: Santa Teresa Lift Station – Generators, and lines are being worked on. Oil and sewage is pooling on the ground.



NMED/SWQB
Official Photograph Log
Photo # 10

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:30 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Santa Teresa Lift Station

Subject: Santa Teresa Lift Station – Generators, and lines are being worked on. Oil and sewage is pooling on the ground.



NMED/SWQB
Official Photograph Log
Photo # 11

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:31 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Santa Teresa Lift Station

Subject: Santa Teresa Lift Station – Indications of sewage run off from the site.



NMED/SWQB
Official Photograph Log
Photo # 12

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:26 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Santa Teresa Lift Station

Subject: Santa Teresa Lift Station – Indications of sewage run off from the site. The road and area from the lift station was saturated in a channel of what appears to be sewage runoff.



NMED/SWQB
Official Photograph Log
Photo # 13

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:28 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Santa Teresa Lift Station

Subject: Another view of Santa Teresa Lift Station – Generators, and lines are being worked on. Oil and sewage is pooling on the ground.



NMED/SWQB
Official Photograph Log
Photo # 14

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:34 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Santa Teresa Lift Station

Subject: A damaged Sewer line pipe at the Santa Teresa lift station is being replaced.



NMED/SWQB
Official Photograph Log
Photo # 15

Photographer: B. Cooney

Date: November 20, 2014

Time: 13:42 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Race track lift station.

Subject: Lift station – overall view of location.



NMED/SWQB
Official Photograph Log
Photo # 16

Photographer: B. Cooney

Date: November 20, 2014

Time: 13:44 Hours

City/County: Sunland Park / Dona Ana - Racetrack lift station.

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Racetrack lift station.

Subject: Lift station, the high level of debris on top of the pump casing indicates overflows have occurred.



NMED/SWQB
Official Photograph Log
Photo # 17 and 18

Photographer: B. Cooney

Date: November 20, 2014

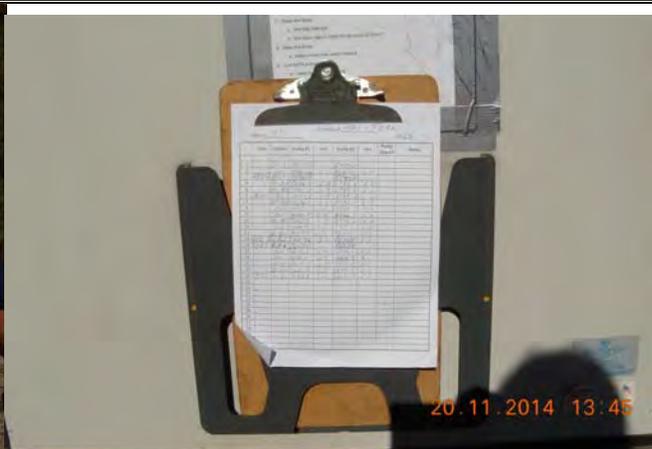
Time: 13:45 Hours

City/County: Sunland Park / Dona Ana - Racetrack lift station.

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Race track lift station

Subject: Lift station and daily logs up to date. However the alarm could not be turned on to check to see if it is operational.



NMED/SWQB
Official Photograph Log
Photo # 19

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:55 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Outfall to the Rio Grande

Subject: Outfall to the Rio Grande



NMED/SWQB
Official Photograph Log
Photo # 20

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:55 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Outfall to the Rio Grande

Subject: Upstream of the outfall, the bankside where the discharge is located is dry. There is water flowing on the other side of the river bed from another source upstream.



NMED/SWQB
Official Photograph Log
Photo # 21

Photographer: B. Cooney

Date: November 20, 2014

Time: 14:57 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Outfall to the Rio Grande

Subject: At the outfall, and below, the river is flowing and dominated by the volume from the effluent.



NMED/SWQB
Official Photograph Log
Photo # 22

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:03 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Outside wall of the aeration basin has splash over of sewage/foam/solids. This is an indication of overloading in the basin.



NMED/SWQB
Official Photograph Log
Photo # 23

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:28 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Basin where splash over the walls have occurred. Note the heavy foam layer and high volume in the basin relative to the freeboard above, less than two feet from the height of the sewage in treatment and the top of the basin walls.



NMED/SWQB
Official Photograph Log
Photo # 24

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:28 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Walkway at the top of the basins are damaged and show sewage over flows to the walkway. The boards are covering the area.



NMED/SWQB
Official Photograph Log
Photo # 25

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:30 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Another view of the heavy foam and solids load in the basins. Note the high marks on the wall, less than a foot from the top and some areas of staining show another area the basin has overflowed. – In the distance is the solids belt press and drying beds area.



NMED/SWQB
Official Photograph Log
Photo # 26

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:34 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Secondary Clarifier.



NMED/SWQB
Official Photograph Log
Photo # 27

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:38 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Secondary Clarifier weirs were clean and free of debris. There is some indication of uneven levels of the weirs causing some short circuiting. The basin had some floating solids indicating old solids and inadequate amount of wasting of solids from the unit.



NMED/SWQB
Official Photograph Log
Photo # 28

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:10 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: The solids belt press and drying beds area.



NMED/SWQB
Official Photograph Log
Photo # 29

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:11 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Belt Press – The solids belt press and drying beds area. Numerous rips and tears are present in the belt. Some areas have been sewn in an attempt to repair it.



NMED/SWQB
Official Photograph Log
Photo # 30

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:11 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: The solids belt press and drying beds area. Closer view of the Belt Press – Numerous rips and tears are present in the belt. Some areas have been sewn in an attempt to repair it.



NMED/SWQB
Official Photograph Log
Photo # 31

Photographer:

Date: November 20, 2014

Time: 15:19 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Sodium Hypochlorite Barrel dripping into the UV disinfection treatment system.



NMED/SWQB
Official Photograph Log
Photo # 32

Photographer: B. Cooney

Date: November 20, 2014

Time: 15:19 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Sodium Hypochlorite Barrel dripping into the UV disinfection treatment system.

