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Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARKLIN
Secretary

BUTCH TONGATE
Acting Deputy Secretary

Certified Mail – Return Receipt Requested

September 30, 2011

Ms. Yolanda Alvarez, Board Chair
Anthony Water and Sanitation District
P. O. Box 1751
Anthony, New Mexico 88021

Re: **Minor-Municipal; SIC 4952; NPDES Compliance Evaluation; Anthony Water and Sanitation District WWTP; NM0029629; September 27, 2011**

Dear Ms. Alvarez:

Enclosed, please find a copy of the report 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.

The main discussions were found in the area of Permit Verification, Recordkeeping and Reporting, Operation and Maintenance, Flow Measurement, Laboratory and Effluent/Receiving Waters Observation. Please refer to the Further Explanations section of the report for more detail.

I wish to thank you for the cooperation extended the NMED personnel while at the Anthony Water and Sanitation District WWTP. If you have any questions about this inspection report, please contact me at (575) 647-7981.

Sincerely:

/s/ STEVEN M. BAUMGARN
Steven M. Baumgarn
Environmental Specialist
Surface Water Quality Bureau

Ms. Yolanda Alvarez
September 30, 2011
Page 2

cc: NMED District III, District Manager

Samuel Tates (6EN-AS) Sent Electronically

Carol Peters-Wagnon (6EN-WM) Sent Electronically

Marcia Adams (6EN-AS) Sent Electronically

Larry Giglio (6WQ-PT) Sent Electronically

Diana McDonald (6EN-WM) Sent Electronically

Sonia Hall and Hannah Branning USEPA (6EN-WC) Sent Electronically



NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <input type="checkbox"/> N 2 <input type="checkbox"/> 5 3 <input type="checkbox"/> N <input type="checkbox"/> M 0 0 2 9 6 2 9 11 12 <input type="checkbox"/> 1 <input type="checkbox"/> 1 0 9 2 7 17 18 <input type="checkbox"/> C 19 <input type="checkbox"/> S 20 <input type="checkbox"/> 1					
Remarks					
<input type="checkbox"/> M <input type="checkbox"/> I <input type="checkbox"/> N <input type="checkbox"/> O <input type="checkbox"/> R <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N <input type="checkbox"/> I <input type="checkbox"/> C <input type="checkbox"/> I <input type="checkbox"/> P <input type="checkbox"/> A <input type="checkbox"/> L <input type="checkbox"/> W <input type="checkbox"/> W <input type="checkbox"/> T <input type="checkbox"/> P					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 69	70 <input type="checkbox"/> 2	71 <input type="checkbox"/> N 72 <input type="checkbox"/> N 73 <input type="checkbox"/> <input type="checkbox"/> 74 75 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 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) ANTHONY WATER & SANITATION DISTRICT, WASTEWATER TREATMENT FACILITY, 1470 NORTH 4 TH , ANTHONY, NEW MEXICO 88021. FROM I-10, TAKE EXIT 162, NM404 (EAST O'HARA ROAD), TRAVEL EAST APPROXIMATELY 0.3 MI. TO NM460, TURN SOUTH (U-TURN DUE TO MEDIAN) ONTO 4 TH STREET, TRAVEL ¼ BLOCK, FACILITY ON LEFT. DONA ANA COUNTY	Entry Time /Date 0830 HOURS 9/27/2011	Permit Effective Date 7/1/07
	Exit Time/Date 1100 HOURS 9/27/2011	Permit Expiration Date 6/30/12
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) RYAN LUNDERVILLE, OPERATOR 575 993 9085 RUIS ROBLES, OPERATOR CHARLES TRUJILLO, OPERATIONS SUPERVISOR 575 650 5295	Other Facility Data LATITUDE 32.02285°	
Name, Address of Responsible Official/Title/Phone and Fax Number YOLANDA ALVAREZ, BOARD OF DIRECTORS, AWSO, P. O. BOX 1751, ANTHONY, NM 88021 575-882-3922 OR 575-882-2413 FAX 575-882-3925	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	LONGITUDE -106.64880° SIC 4952

Section C: Areas Evaluated During Inspection

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

S	Permit	U	Flow Measurement	U	Operations & Maintenance	N	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
U	Effluent/Receiving Waters	M	Laboratory	N	Storm Water		Other:

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

PLEASE SEE THE ATTACHED REPORT WITH FURTHER EXPLANATIONS

Name(s) and Signature(s) of Inspector(s) /s/ STEVEN M. BAUMGARN	Agency/Office/Telephone/Fax NMED/SWQB 575-647-7981	Date 9/30/2011
Signature of Management QA Reviewer /s/ RICHARD E. POWELL	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 9/30/2011

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED YES)

- 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. 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.2/14/11 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 YES)

- 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. 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. Y N NA
 TYPE OF DEVICE
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 3/14/11) 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. 10 % OF THE TIME. Y N NA
6. SPIKED SAMPLES ARE ANALYZED. % OF THE TIME. Y N NA
7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME WATER TECHNOLOGY ASSOCIATES BIO AQUATICS
 LAB ADDRESS LAS CRUCES CARROLTON, TX
 PARAMETERS PERFORMED BOD, TSS, E-COLI BIOMONITORING

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
001	NONE	NONE	NONE	NONE	NONE	CLEAR	

RECEIVING WATER OBSERVATIONS

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED).
 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: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE) LANDFILL

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED NA).

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

**Anthony Water and Sanitation District WWTP
Compliance Evaluation Inspection
NM0029629
September 27, 2011**

Narrative

Introduction

On September 27, 2011, a Compliance Evaluation Inspection (CEI) was conducted at the Anthony Water and Sanitation District Wastewater Treatment Plant (WWTP) by Steven M. Baumgarn of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The Anthony WWTP is classified as a minor municipal discharger under the federal Clean Water Act's Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned permit number NM0029629. The discharge is to Segment 20.6.4.101 NMAC of the Rio Grande Basin.

NMED performs a certain number of CEIs for the U. S. Environmental Protection Agency (USEPA) each year. The purpose of this inspection was to evaluate compliance with the NPDES permit. The enclosed report is based on records review, on site observations made by NMED personnel and verbal information provided by Ryan Lundervill, Ruis Robles, Operators and Charles Trujillo, the Operations Supervisor.

The NMED inspector arrived at the AWSDD office at 0830 hours on September 27, 2011, where he met with the operators. Credentials were shown and the purpose of the inspection was made clear. The inspector conducted a tour of the facility followed by a review of the plant records. An exit interview was conducted at 1100 hours on September 27, 2011.

Treatment Scheme

The Anthony WWTP has a hydraulic capacity of 0.99 MGD. The average flow entering this facility over the last year has been over 0.600 MGD. This facility began operation January 28, 1996.

Flow from the City of Anthony enters the WWTP from eight lift stations. An instantaneous flow measuring device is located on the influent pipe as it enters the treatment works. This unit provides both instantaneous flow and a totalizer which is read daily at 0800 hours. A pager 7-day graph read out is located on a wall in the control building. These records are kept on site. The headworks consists of a manually cleaned bar screen. Screenings are placed in a container for shipment to a sanitary landfill after drying.

Flow from the headworks enters the first of four aeration basins. The aeration basins run in series. In between each aeration basin is an anoxic basin for nitrogen removal. Flow passes through all seven basins during the treatment phase. In the aeration basins dissolved oxygen (DO) levels are maintained between 0.2 and 1.5 mg/l. The Mixed Liquor Suspended Solids (MLSS) level is maintained between 2800 and 3500 mg/l. DO in the anoxic basins is generally near 0 mg/l. A mixer in the anoxic basins keeps the solids suspended and the contents moving,

but provides no oxygenation. Air for the aeration basins is provided through in-line diffusers on the bottom of the aeration basins. Blowers provide the air for the aeration system. There are two blowers on site which are not alternated on a daily basis to reduce excessive wear.

Flow from aeration basin number 4 enters the circular, centrally located secondary clarifier via an 18 inch influent line. Solids are allowed to settle in this unit and returned to the aeration basins through a return activated sludge (RAS) line. When MLSS levels get relatively high, sludge is wasted to an aerobic digester. The clarifier is skirted to prevent floating material from exiting the unit. The weirs on this unit were even and no short circuiting appeared to be taking place. Some foam and ash was observed floating on the surface. A sweep arm scum removal system is employed to pick the foam off the surface and deposit it into a scum box. The scum box contents are drained into the digester. Scrappers are used on the bottom of this unit to move sludge to the center of the clarifier. A sludge blanket of approximately 2.5 to 3 feet is maintained in this unit. Effluent from the clarifier flows by gravity in the weir gallery to a 16-inch clarifier effluent line. The contents of this unit were very clear and the operators indicated they were having problems with algal growth both in the clarifier and the weir gallery.

Flow from the secondary clarifier travels by gravity to the disinfection unit. Disinfection at this facility is accomplished through two banks of ultra violet (UV) lamps located in the effluent channel. An opacity meter at this unit determines when the lamps need to be cleaned.

After the disinfection unit effluent flow measurement takes place. An in-channel 12-inch Parshall flume is used to measure effluent flow with a secondary sonic sensor device for continuous readout of the flow in gpm and a totalizer. Flow then leaves the WWTP by gravity and enters the Rio Grande through a 3 mile long discharge pipe.

Sludge

Waste activated sludge (WAS) is pumped from the secondary clarifier to an aerobic digestion unit. The contents are aerated and mixed prior to going to the belt filter press. Dried sludge is then removed and transferred to a sanitary landfill in Sunland Park for final disposal.

Anthony Water and Sanitation District WWTP
Compliance Evaluation Inspection
NM0029629
September 27, 2011

Further Explanations

Note: The sections arranged to correspond with EPA form 3560-3 and checklist, attached, and not necessarily in order of importance.

Permit Verification

Permit Requirements for Permit Verification

The permit requires, in Part III, Section A.4, Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application shall be submitted at least 180 days before the expiration date of this permit. The Director may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date. Continuation of expiring permits shall be governed by regulations promulgated at 40 CFR Part 122.6 and any subsequent amendments.

Findings for Permit Verification

Upon review of this NPDES permit it was noted that the expiration date is listed as June 30, 2012. This indicates that the renewal application must be submitted to EPA Region 6 by the end of December this year. Work needs to begin to fill out and submit an NPDES permit application fairly soon to ensure that it is submitted in a timely manner.

It should also be noted that there was no copy of the NPDES permit on site at the time of this inspection. In order for the operators to assured that they are complying with the conditions of the permit a copy needs to be maintained at the facility.

Recordkeeping and Reporting

Permit Requirements for Recordkeeping and Reporting

The permit requires, in Part III, Section C.4, Record Contents

Records of monitoring information shall include:

- a. The date, exact place, and time of sampling or measurements;*
- b. The individual(s) who performed the sampling or measurement;*
- c. The date(s) and time(s) analyses were performed;*

- d. *The individual(s) who performed the analyses;*
- e. *The analytical techniques or methods used; and*
- f. *The results of such analyses.*

Findings for Recordkeeping and Reporting

As part of this inspection the bench sheets for May 2011 were reviewed to determine completeness. It was noted that there was only one bench sheet for pH during the month of May. It was also noted that the analyst and the time of analysis were not included on the bench sheet. The lab person at that time did not realize that more than one sample per month was needed and have since changed the number of samples collected during the month. The time and analyst are important because the pH analysis needs to be completed within 15 minutes of sample collection.

Operation and Maintenance

Permit Requirements for Operation and Maintenance

The permit requires, in Part III, Section B.3, Proper Operation and Maintenance

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 which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls appropriate quality assurance procedures. This provision requires the operation of backup 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.

Findings for Operation and Maintenance

As indicated in the Treatment Scheme section of this report, this facility presently only has two blowers to provide air to the aeration basins. Both blowers are operating continuously and the permittee is unable to rotate the blowers. With the increase in influent loading one blower will not provide enough air to keep the oxygen concentration high enough to adequately treat the wastewater. Consideration should be given to adding an additional blower to allow for resting periods and increase the life of the existing blowers.

The alarm system has been disconnected at this facility. The permittee is presently relying on the on call operator to check on the facility during off hours to ensure there are no problems at the facility which need to be addressed. This unit should be returned to service as soon as possible.

The operators indicated that the board is considering the addition of a duplicate treatment plant which is a mirror image of the existing treatment plant to help with the increase in influent

loading. If this plan is implemented the work will not begin on the new treatment plant for another two years.

Although the bar screen at this facility is doing a fairly good job removing floatable materials from entering the treatment plant, there were a few pieces of plastic getting through to the final clarifier. These floatables were backed up against the weirs and blocking some of the weir notches. This did not appear to be affecting the quality of the effluent from this unit, but care should be taken to remove these materials when the weir troughs are being cleaned. There were also some floating foam and ash on the surface of the final clarifier. Some light pin floc was noted coming up at the outside edge of the clarifier. The operators indicated that this often occurs early in the morning and that when the sun comes out the pin floc disappears. The operators indicated that pin floc seems to be more prevalent during the spring and fall months when the temperature is changing in the treatment plant.

The operators state that two of the mixers in the anoxic basins are down. They have been removed and are being repaired. They indicated that this has not affected the dissolved concentration in these units very much and they are continuing to have adequate treatment through these units.

There is no ordinance requiring grease traps to be installed within the collection system. There is a policy, however, and the operators can periodically go out and make sure the grease traps are being cleaned on a regular basis. They generally require the restaurant owners to provide documentation as to the pickup dates for the grease pumps. There are presently only two restaurants on their collection system. There did not appear to be a problem with grease in the treatment units at this facility.

Flow Measurement

Permit Requirements for Flow Measurements

The permit requires, in Part III, Section 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 device 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.

The permit also requires, in Part III, Section C.5.b, Monitoring Procedures

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 activity.

Findings for Flow Measurements

The flow meter was last calibrated by a professional on March 14, 2011. Periodic checks have not been done for quite some time. The inspector discussed the need of checking the flow measurement digital readout versus the staff gage in the Parshall flume. This should be done at least a few times per year to ensure the $\pm 10\%$ requirement stated above is being met. If a problem occurs, the manufacturer can be notified and a professional calibration can take place. Logs should be kept on this activity so that an inspector can review this activity when an inspection occurs.

Laboratory

Permit Requirements for Laboratory

The permit requires, in Part III, Section C.5.a, Monitoring Procedures

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.

Findings for Laboratory

During this inspection the inspector noted that the date the bottles were opened was not written on the bottles. When new bottles of buffer solution are received the date they are opened should be marked on the bottle. The buffer solution expires one year after the opening date and should be discarded at that time.

Effluent/Receiving Waters Observation

Permit Requirements for Effluent Limitations and Monitoring Requirements

The permit requires, in Part I, Section A, Limitations and Monitoring Requirements

<i>Effluent Characteristics</i>	<i>Discharge Limitations</i>		
	<i>30-day Avg</i>	<i>7-day Avg</i>	<i>Max</i>
<i>Biochemical Oxygen Demand (5-day)</i>	<i>30 mg/l</i>	<i>45 mg/l</i>	
<i>Total Suspended Solids</i>	<i>30 mg/l</i>	<i>45 mg/l</i>	
<i>E-coli Bacteria (Colonies/100 ml)</i>	<i>126</i>		<i>410</i>

Findings for Effluent Limitations and Monitoring Requirements

As part of this inspection the discharge monitoring reports (DMRs) were reviewed for the years 2009, 2010 and 2011 (see the attached chart). During this period the following excursions were noted:

Monthly Average e-coli	148 org/100ml	October 2010
Monthly Maximum e-coli	2400 org/100ml	October 2010
Monthly Average TSS	45.3 mg/l	November 2010
7-day Average TSS	54 mg/l	November 2010
Monthly Maximum e-coli	3400 org/100ml	January 2011

Along with the DMR there was an explanation for the excursions with an explanation of remediation.

Sludge

Permit Requirements for Sludge

The permit requires, in Part IV, Element 3, Section I, Requirements Applying to all Sewage Sludge Disposed in a Municipal Solid Waste Landfill

1. *The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal regulations to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic Pollutants that may be present. The permittee shall ensure that the sewage sludge meets the requirements in 40 CFR 258 concerning the quality of the sludge disposed in a municipal solid waste landfill.*

3. *If the permittee generates sewage sludge and supplies that sewage sludge to the owner or operator of a MSWLF for disposal, the permittee shall provide to the owner or operator of the MSWLF appropriate information needed to be in compliance with the provisions of this permit.*

6. *Recordkeeping requirements – The permittee shall develop the following information for five years. The sludge documents will be retained on site at the same location as other NPDES records.*
 - a. *The description and results of tests performed, required by the owner/operator of the MSWLF to demonstrate compliance with the 40 CFR 258 regulations.*

 - b. *A certification that sewage sludge meets the requirements in 40 CFR 258 concerning the quality of the sludge disposed in a municipal solid waste landfill unit.*

In 40 CFR 258 it states:

40 CFR 258.20.(a) Owners or operators of all MSWLF units must implement a program at the facility for detecting and preventing the disposal of regulated hazardous wastes as

defined in part 261 of this chapter and polychlorinated biphenyls (PCB) wastes as defined in part 761 of this chapter.

40 CFR 258.28.(c).(1) Liquid waste means any wastes material that is determined to contain "free liquids" as defined by Method 9095 (Paint Filter Test). . .

Findings for Sludge

All facilities that transport sludge to a landfill are required to collect samples for TCLP, PCB, and Paint Filter Test prior to shipment and that information is required to be given to the owner or operator of the landfill. This sample needs to be done at a minimum of once per year. According to the operators no sample has been collected for the above listed parameters since 2008. This should be done as soon as possible. The permittee also needs to get a statement from the landfill that they comply with the regulations in 40 CFR Part 258.

As a general rule the pressed sludge leaving the belt filter press is conveyed to a container which is covered with plastic and taken directly to the landfill. Recently they have had problems with their polymer feed pump and while repairs were being made they got backed up in hauling sludge. As a result there was a pile of sludge stockpiled on the loading pad adjacent to the belt filter press. It was noted that there is no berm around the edge of the pad to ensure stormwater runoff does not occur. During periods when sludge is being stockpiled on this pad, a berm should be constructed to prevent runoff from occurring.

**Anthony Water and Sanitation District WWTP
Compliance Evaluation Inspection
NM0029629
September 27, 2011**

Discharge Monitoring Report Review for 2009, 2010, and 2011

<u>Date</u>	<u>BOD(mg/l)</u>		<u>TSS(mg/l)</u>		<u>E-coli/100ml)</u>	
	<u>30d Avg</u>	<u>7d Avg</u>	<u>30d Avg</u>	<u>7d Avg</u>	<u>Ave</u>	<u>Max</u>
01/09	0.67	1.6	1.9	2.8	1	1
02/09	1.33	2.5	1.95	2.4	1	1
03/09	1.6	3.2	2.5	3.8	1.8	10
04/09	3.1	7.6	5.46	16.8	9	53
05/09	1.5	3.8	4.75	6.4	1	1
06/09	0.25	1	3.15	4.8	1.32	3
07/09	3	8.2	1.5	2	1	1
08/09	1.8	4.4	1.8	3.1	1.1	2
09/09	1.3	1.7	1.9	2.1	1	1
10/09	1.1	1.4	3	4.5	1	1
11/09	1	1	2.1	2.7	1	1
12/09	1	1	2.5	3.6	2.6	11
01/10	1.4	1.8	3.2	6.5	4.7	36
02/10	2.2	3.2	2.8	4.2	9.1	68
03/10	1.5	2.6	2.3	2.6	4.8	76
04/10	1.3	2.5	1.16	1.4	1.6	5
05/10	1	1	1.13	1.4	1	1
06/10	1.6	3.4	1.05	1.2	1.2	2
07/10	1.3	2.3	1.9	3.6	3.3	30
08/10	1.4	2	2.4	3.5	1.2	2
09/10	3	4.2	7	13	1.1	2
10/10	8	13.2	11.4	19.6	148*	2400*
11/10	11.4	14.6	45.3*	54*	125.9	280
12/10	10.1	14.1	14.2	19.2	3.3	12.6
01/11	12.7	22.5	21.1	33.8	105	3400*
02/11	10.6	15.5	15	21	3.13	6
03/11	3.2	7.6	12.6	24.4	1.6	10
04/11	2.6	5.1	9	12	2.1	9
05/11	1.9	2.6	8.8	10.7	2	17
06/11	3.7	7.1	10.2	17.3	10.4	43

Permit Limits 30 45 30 45 126 410

* = NPDES permit excursion